PLAN

Confirmatory Soil Sampling
80 Steel Street
Rochester, New York

Ben Weitsman of Rochester, LLC and
Weitsman Rochester Realty, LLC

January 2014

O'BRIEN & GERE

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LIST OF ACRONYMS/ABBREVIATIONS

ASTM	American Society for Testing and Materials
bgs	below ground surface
CFR	Code of Federal Regulations
CY	Cubic yards
DOT	Department of Transportation
ELAP	Environmental Laboratory Accreditation Program
ft	foot or feet
JSA	Job Safety Analysis
GPS	Global Positioning System
HASP	Health and Safety Plan
IDW	investigation-derived waste
mg/kg	milligram per kilogram
mg/L	milligrams per liter
NYS	New York State
NYSDEC	New York State Department of Environmental Conservation
NYSDOH	New York State Department of Health
OSHA	Occupational Safety and Health Administration
Part 375	New York State Codes, Rules and Regulations; Title 6, Chapter IV, Subpart 375
PCB	polychlorinated biphenyl
PID	photoionization detector
ppm	parts per million
PPE	personal protective equipment
QA/QC	Quality Assurance/Quality Control
Site	80 Steel Street, Rochester, New York
TCLP	Toxicity Characteristic Leaching Procedure
TSCA	Toxic Substances Control Act
U.S.	United States
USCS	Unified Soil Classification System
USEPA	United States Environmental Protection Agency

1. INTRODUCTION

O'Brien & Gere has developed this *Confirmatory Soil Sampling Plan* (Plan) on behalf of Ben Weitsman of Rochester, LLC and Weitsman Rochester Realty, LLC (Weitsman) as required by the New York State Department of Environmental Conservation (NYSDEC) and United States Environmental Protection Agency (USEPA). The purpose of the Plan is to document the procedures for conducting a confirmatory soil sampling program following removal and disposal of the Debris Piles at 80 Steel Street (Site), located in the City of Rochester, New York. The confirmatory soil samples will be collected from the former footprints of the Debris Piles and submitted for laboratory analysis of total polychlorinated byphenols (PCBs) for the purpose of evaluating the cleanup as complete.

The Plan has been prepared consistent with the requirements of Title 40 of the Code of Federal Regulations, Part 761, Subpart O – Sampling to Verify Completion of Self-Implementing Cleanup and On-Site Disposal of Bulk PCB Remediation Waste and Porous Surfaces in Accordance with Subpart 761.61(a)(6).

As the Site is considered to be, or potentially to be, a "High-Occupancy Area" as defined in 40CFR 761.3 and 40CFR 761.61(a)(4)(A) due to workers being present on Site seven days a week, the confirmatory soil sampling analytical results will be used to document residual contaminants consistent with applicable regulations. Therefore, cleanup of the soils underlying the former Debris Piles will be considered complete if 1) total PCBs are below 10 ppm, and six inches of asphalt is subsequently placed over these areas in accordance with 40CFR 761.61(a) (7) and (a) (8) and 2) the results meet requirements under Chapter 6 of the New York Code Rules and Regulations (6NYCRR) Part 375, as applicable.

2. SITE HISTORY AND DESCRIPTION

2.1. SITE LOCATION, CURRENT CONDITIONS, AND USE

The Site is located at 80 Steel Street in the City of Rochester, Monroe County, New York. A Site Location map is provided as **Figure 1**. The Debris Piles are situated on the eastern side of the Site as shown on **Figure 2.**

The Site is an active vehicle dismantling, scrap metal processing, and recycling facility owned and operated by Weitsman. A variety of scrap metal is brought to the facility for recycling including ferrous and non-ferrous metals.

The Site is bordered by 80 Steel Street to the west, Oxford Street and a bus garage to the west-northwest, Ferrano Street to the north, railroad tracks to the east, and a commercial business to the south on Lyell Avenue. The Site is relatively flat in topography, is largely dirt/gravel/pavement covered, and improved with two buildings. The weight scale and office are situated on Steel Street where customers bring scrap metal into the facility and then drive to various locations on the Site to unload based upon the type of scrap being delivered.

2.2. SITE HISTORY

Weitsman purchased the Site and its scrap metal operations in August 2011. During a routine site walkover by NYSDEC in the summer of 2012, NYSDEC inquired of Weitsman as to the Debris Piles. As a result and in direct consultation with NYSDEC, Weitsman subsequently performed four rounds of characterization sampling on August 9, 2012; October 11, 2012; November 19, 2012; and June 17 to June 19, 2013. NYSDEC assisted Weitsman personnel during the sample collection activities performed on October 11, 2012 and November 19, 2012 and has reviewed each of the first three rounds of sampling results submitted to them by Weitsman.

The final characterization event was conducted from June 17 through June 19, 2013 by O'Brien & Gere, in accordance with the modified *Debris Pile Characterization Work Plan*, prepared and revised by O'Brien & Gere, and conditionally approved by NYSDEC on May 20, 2013. The results of the final characterization event was summarized in the *Debris Pile Characterization Report*, prepared by O'Brien & Gere and submitted to the NYSDEC on August, 28, 2013 and subsequently to the United States Environmental Protection agency (USEPA).

O'Brien & Gere prepared a *Debris Pile Management Work Plan* (Work Plan) to load, transport and dispose of the Debris Piles. The Work Plan was submitted to NYSDEC and USEPA on October 1, 2013 and subsequently

resubmitted to USEPA on October 31, 2013. The four sections of the Debris Piles exhibiting total PCBs greater than 48 ppm were disposed of on November 12-14, 2013. USEPA approval of the Work Plan was received on January 6, 2014. The removal of the remaining portions of the Debris Piles commenced on January 15, 2014.

3. SCOPE OF WORK

Presented within this section are the confirmatory sampling field activities, health and safety requirements, quality assurance/quality control protocols, soil and concrete sampling procedures, laboratory methods, decontamination procedures, management of investigation-derived waste (IDW), and proposed reporting of results. Deviations from the Plan will require notification and prior approval of NYSDEC and USEPA.

3.1. HEALTH AND SAFETY MONITORING

A Job Safety Analysis (JSA) had previously been prepared for activities associated with the Debris Piles. As part of this Plan, the existing JSA will be updated for the activities described herein. The JSA was prepared in accordance with applicable general industry and construction standards of the Federal Occupational Safety and Health Administration (OSHA) and United States Department of Labor (DOL). The JSA will be followed by O'Brien & Gere personnel involved in the work.

As a means for controlling dust at the Site, and to prevent dust particles from becoming air born, water will be used to wet the areas being sampled as necessary to eliminate air born dust. Air monitoring will be conducted during sampling activities to document that excessive vapors and dusts are not generated. Air monitoring will include the use of a dust monitor and photoionization detector (PID).

3.2. QUALITY ASSURANCE/QUALITY CONTROL PROTOCOLS

The objective of the proposed sampling presented herein is to obtain environmental samples of sufficient quality to support cleanup decisions.

Two O'Brien & Gere representatives will be on-Site to implement the Plan.

A sample numbering system will be used to uniquely identify each sample collected and to allow retrieval of sample-specific information.

Where possible, new, dedicated sampling equipment (*e.g.* disposable plastic trowels) will be used to collect and place soil samples into pre-cleaned sample containers obtained from the laboratory. At sample locations where the soil hardness precludes the use of a dedicated disposable plastic trowel, a stainless steel pointed trowel will be utilized. In the event the ground is frozen, a cordless drill and carbide drill bit will be used to break up the soil. Non-dedicated sampling equipment will be decontaminated between sampling locations in accordance with Section 3.6.

Care shall be taken to only place soil and not metal or other debris into the sample container for analysis. The sample containers will be properly labeled and promptly transferred to a cooler packed with ice pending transfer to the laboratory. Samples will be transported within 24 hours of being collected for arrival at the laboratory no later than 48 hours after sample collection. Samples will be analyzed within the holding times specified by the analytical method.

The appropriate chain of custody protocols for collection of samples will be complied with, a prequalified New York State Department of Health (NYSDOH) Environmental Laboratory Analytical Program (ELAP)-certified laboratory will perform analysis of samples, and the laboratory will provide a standard report package.

3.3. CONFIRMATORY SOIL SAMPLE COLLECTION

O'Brien & Gere will utilize a square-based grid system to overlay the cleanup areas of the former Debris Pile footprints. Two separate 1.5 meter grid systems will be demarcated in the field utilizing stakes, flagging, and marking paint: one over AOC-5 and another over AOCs 1-4. The grids will be oriented roughly in the north-south and east–west directions in parallel and perpendicular to the axis of the former Debris Piles.

At each grid intersect overlying the cleanup area; a grab soil sample will be collected from a depth of 0-2 inches below ground surface. Samples will primarily be composited from a maximum number of nine grab samples, or where not feasible to composite with adjacent locations, analyzed individually depending on spatial location. As shown on **Figure 2**, a total of 90 composites, 21 linear composites and 6 individual grab samples are proposed, for a total of 116 samples to be submitted for laboratory analysis.

For composite samples, approximately 0.4-0.5 ounces of soil will be collected from each of the nine grab sample locations (*i.e.*, the composite sample will comprise approximate equal amounts of each of the grab samples it contains). The grab samples will be placed in a 4 ounce glass jar provided by the laboratory. The laboratory will be directed on the chain of custody to mix and homogenize the sample jar contents prior to analysis. For samples designated as a single grab sample location, approximately 4 ounces of soil will be collected from the grid intercept and placed in the glass jar provided by the laboratory.

One equipment rinseate blank will be collected each day that sampling activities include the use of non-dedicated equipment such as the trowel or carbide drill tip. The equipment will first be decontaminated per Section 3.6. Following decontamination, laboratory-supplied water will be poured over the equipment into a 1 liter bottle provided by the laboratory.

No trip blanks or other QA/QC samples will be collected. Samples collected will be analyzed using USEPA SW-846 methods for PCBs. The laboratory analysis will be completed by Paradigm Environmental Services, Inc. (Paradigm) located in Rochester, NY, with a standard turnaround time of five business days. Paradigm's ELAP number is 10958.

The laboratory will provide a standard report package. In addition the laboratory will provide the data in electronic format for incorporation into a database, which will be used to generate tables and figures for the Construction Report, which will document the removal of the Debris Piles as well as the Confirmatory Soil Sampling results. The analytical results will be included as an Exhibit of the Construction Report.

3.4. CONFIRMATORY CONCRETE SAMPLE COLLECTION

During the loading, transportation and disposal of the over 48 ppm total PCBs portions of the Debris Piles, a concrete surface slab was observed below the southwest corner of AOC 1 as shown in **Figure 2**. It is unknown to what areal extent the concrete slab is present below AOCs 1 and 2. Therefore, following the removal of the Debris Piles, the concrete slab will be sampled for PCB content.

The following procedure was derived from USEPA guidance document OPPT-2004-0123, PCB Site Revitalization under the Toxic Substances Control Act, Appendix A – Draft Standard Operating Procedure for Sampling Concrete in the Field.

Concrete drill samples will be collected utilizing a hammer drill and carbide bit to produce a finely ground concrete powder that will be collected for laboratory analysis. A decontaminated drill bit and disposable cardstock for each sample location will be used. Once the areal extent of the concrete slab is identified, a field decision will be made as to how many composite, linear composite or individual grab samples will be obtained from the concrete slab. Once the grid intersect sample location is selected, a minimum of three holes will be drilled no deeper than ½-inch into the concrete surface and the samples will be collected within a 4-inch diameter circle. The dust generated from the drilling of these holes will be placed into a 4-ounce jar provided by the laboratory. The cardstock will be used to collect and transfer the sample dust to the sample container. The laboratory will be directed on the chain of custody to mix and homogenize the sample jar contents prior to analysis. To clarify, if an individual grab sample is to be collected from the concrete, three holes will be required and drilled within a four inch diameter circle. If a composite, linear composite sample is required to be collected from nine grid intersect locations, then 27 holes will be drilled. The laboratory requires a minimum of 5 grams of concrete dust to conduct the analysis.

3.5. CONTINGENT LABORATORY ANALYSIS

In addition to collecting soil samples for PCB analysis, O'Brien & Gere will complete a soil sample log for each sample submitted to the laboratory documenting encountered surface material and other pertinent observations, including color, consistency, odor and staining. Soil samples collected from each location will be physically inspected and field screened with a PID for evidence of VOCs. In the event evidence of contamination as indicated by elevated PID readings (*e.g.* 5 ppm above background) and/or visual or olfactory observations of potential contamination are present, a contingency grab sample will be collected from a depth of 6 inches below ground surface and submitted for laboratory analysis. The grab sample will be submitted to Paradigm for the following analysis:

- Target Compound List (TCL) Volatile Organic Compounds (VOCs) by USEPA Method 8260 + 30 Tentatively Identified Compounds (TICs); and
- TCL Semi-Volatile Organic Compounds (SVOCs) by USEPA Method 8270 (base/neutral extractables) + 30 TICS

3.6. DECONTAMINATION PROCEDURES

The method of decontaminating the stainless steel trowel or drill bit between sampling locations would include first using a potable water/alconox wash and rinse followed by an acetone wash/rinse.

The decontamination would be conducted over poly sheeting using 5-gallon buckets and scrub brushes. Spent decontamination fluids and used poly would be staged in 55-gallon drums and properly labeled. The spent fluids and used poly would be transported and disposed at a permitted facility.

3.7. MANAGEMENT OF ANCILLARY WASTES

3.7.1 General

The soil sampling activities are anticipated to generate ancillary waste that will require appropriate management in accordance with state and federal regulations (Title 40 of the Code of Federal Regulations [CFR] Parts 239 through 279 and Title 6 of New York Codes, Rules and Regulations [6 NYCRR] Chapter IV, Subchapter B Parts 360 through 376). The anticipated ancillary wastes include the following:

- Decontamination fluids and poly sheeting resulting from decontamination of sampling equipment
- Used personal protective equipment (PPE) resulting from the execution of field activities
- General refuse.

The management of these wastes is discussed below.

3.7.2 Decontamination Fluids and Poly Sheeting

The decontamination fluids used during the soil sampling activities will be placed in a 55-gallon drum. The poly sheeting will be placed in a second 55-gallon drum.

At the end of the construction activities, these drums will be transported and disposed of at a permitted facility.

3.7.3 PPE and Associated Materials

Used PPE and other associated debris will be placed in trash bags as appropriate and disposed of with the Site's solid waste (*e.g.*, the Site's dumpster).

3.7.4 General Refuse

General refuse will be placed in trash bags and disposed of in appropriate waste receptacles (*e.g.,* the Site's dumpster).

4. PROJECT PERSONNEL

The personnel for this project are anticipated as follows:

Name and Title	Telephone
NYSDEC Key Personnel	
Michael Khalil, P.E. **Environmental Engineer II** **Region 8** **Avon, New York**	(585) 226-5415
USEPA Key Personnel	
James Haklar **Regional PCB Coordinator / PCB Disposal** **Edison, New Jersey**	(732) 906-6817
O'Brien & Gere Key Personnel	
Doug Crawford, P.E. **Project Officer** **Syracuse, New York**	(315) 956-6442
Kevin Ignaszak, P.E. **Project Manager** **Rochester, New York**	(585) 295-7709 (585) 752-6611 (cell)
Jeff Parsons **Corporate Associate for Safety and Health** **Syracuse, New York**	(315) 956-6070 (315) 391-0638 (cell)
Logan Reid **Scientist/Field Team Leader** **Rochester, New York**	(585) 295-7717 (516) 780-1894 (cell)
Subcontractors	
Analytical Laboratory: Paradigm Environmental Services, Inc. **Rochester, New York**	(585) 647-2530
Weitsman Key Personnel	
Aaron Weiner **General Manager** **Rochester, New York**	(585) 254-0360

5. REPORT

Following completion of the Scope of Work described in this Plan, the results will be presented within the Construction Report to be prepared in accordance with the Work Plan. Specific confirmatory soil sampling program information to be contained in the Construction Report is as follows:

- A description of the field activities
- A summary of the laboratory results and findings
- An evaluation of the findings and recommendations

Relevant supporting data including laboratory analytical data, sampling forms and photographs will be included.

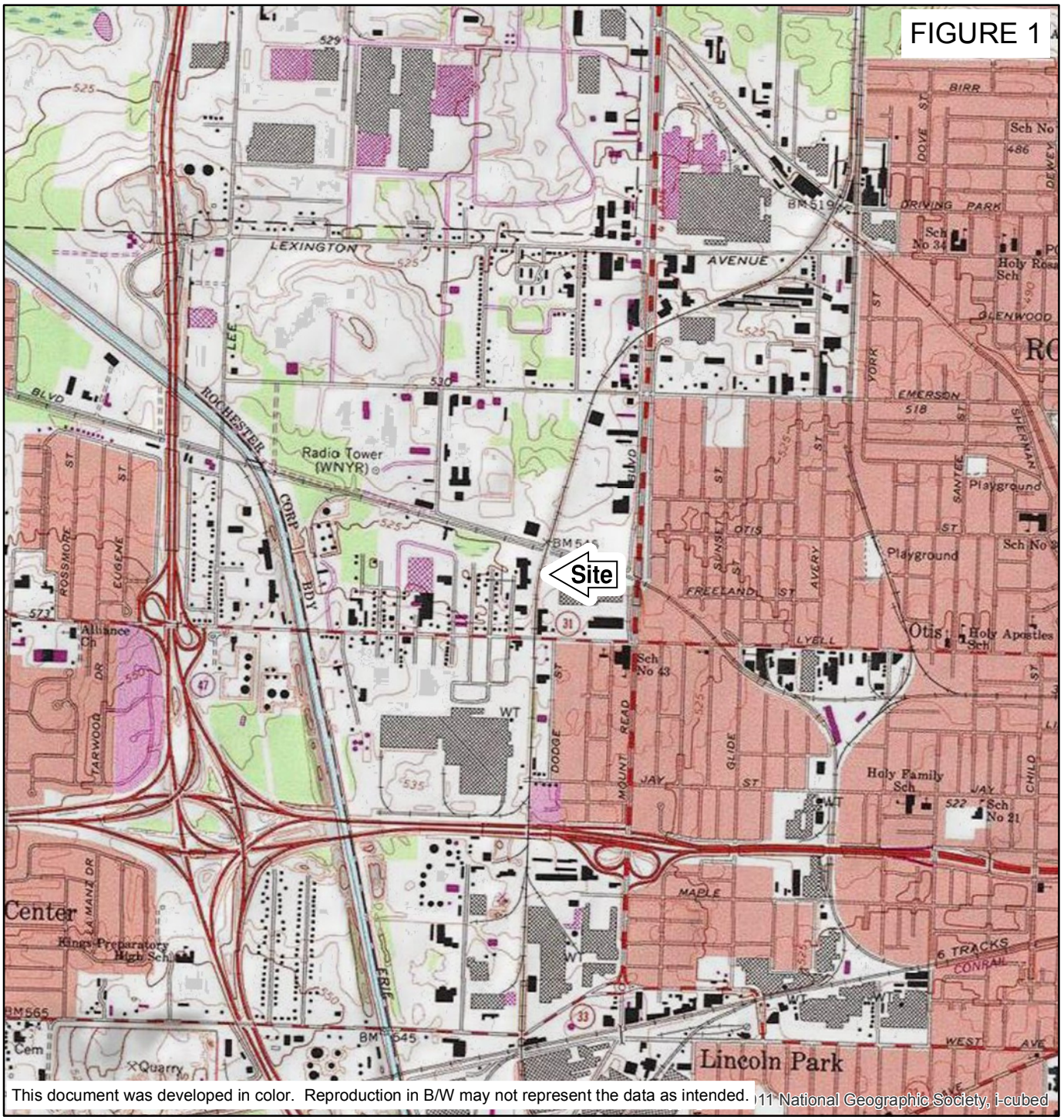
6. SCHEDULE

Following removal of the Debris Piles, it is estimated the confirmatory soil sampling program field work will take 5 days to complete. A standard laboratory turnaround time of 5 business days is proposed. Dependent upon truck and equipment traffic, sampling may be conducted after a pile is removed (e.g. Pile 5) and the decision to do so will be based on field judgment.

I:\Ben-Weitsman.6084\50162.80-Steel-Street\Docs\DWG\MXD\SITE_LOC.mxd

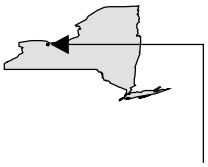
PLOTDATE: 04/01/13 4:00:07 PM ReidLS

FIGURE 1



ADAPTED FROM: ROCHESTER WEST, NEW YORK USGS QUADRANGLE

BEN WEITSMAN OF ROCHESTER, LLC
WEITSMAN ROCHESTER REALTY, LLC
CONFIRMATORY SOIL SAMPLING PLAN
POST PILE REMOVAL
80 STEEL STREET
ROCHESTER, NEW YORK



MAP LOCATION

SITE LOCATION

N

0 1,000 2,000 4,000 6,000 8,000

Feet

NOVEMBER 2013
6084.50162

1:24,000

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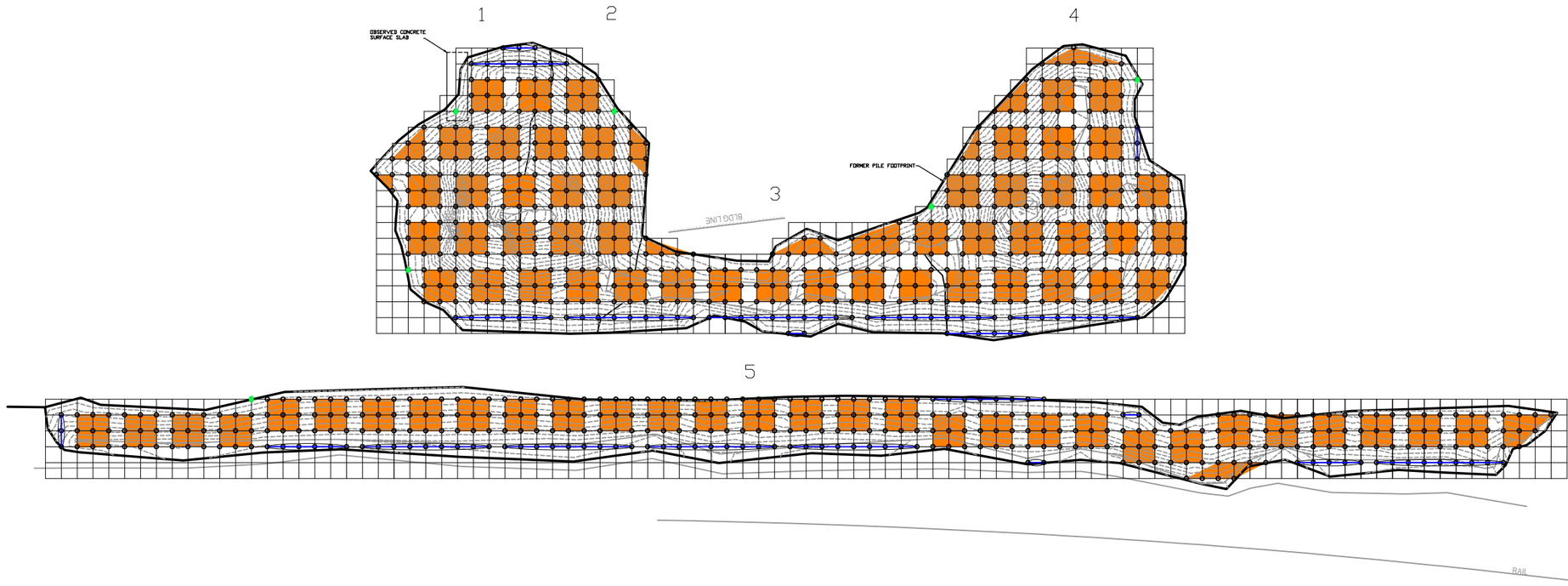
NOTES:
GRID SPACING IS 1.5M (4.922-FEET)



N

LEGEND

- 1 GRAB SAMPLE FROM GRID INTERSECTS
- 1 COMPOSITE "LINEAR" SAMPLE FROM A MAXIMUM OF 9 GRABS AT GRID INTERSECTS
- 1 COMPOSITE SAMPLE FROM UP TO 9 GRABS AT GRID INTERSECTS
- QUADRANT BOUNDARY
- 1 FORMER AOC NUMBER

BEN WEITSMAN OF ROCHESTER, LLC
WEITSMAN ROCHESTER REALTY, LLC
CONFIRMATORY SOIL SAMPLING PLAN
POST PILE REMOVAL
80 STEEL STREET
ROCHESTER, NEW YORK

PROPOSED SOIL SAMPLE LOCATIONS

1"=40' 40 0 40

FILE NO. 6084.50162
NOVEMBER 2013

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