A MEMBER OF THE ENVIRONMENTAL RESOURCES MANAGEMENT GROUP

REMEDIAL DESIGN / REMEDIAL ACTIVITIES
318 URBAN STREET SITE
BUFFALO, NEW YORK
DEC SITE # 915151

Prepared For:

General Electric
Corporate Environmental Programs
One Computer Drive South
Albany, New York 12205

October 24, 1995

ERM-NORTHEAST, INC.
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We will conform to those requirements at all times and satisfy the requirements in the most efficient and cost-effective manner.

Our quality policy and procedures include an absolute commitment to provide superior service and responsiveness to our clients.

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1.0 INTRODUCTION

In accordance with the Record of Decision (ROD) for the 318 Urban Street Site, dated March 1995, General Electric (GE) has developed the following Remedial Design/ Remedial Action (RD/RA) Workplan to accomplish the specific remedial objectives. These objectives include removal of PCB containing soil, decontamination of the main building, demolition of a small steel building, removal and replacement of Site storm sewers, and cleaning of certain off-site sewers.

1.1 BACKGROUND

1.1.1 LOCATION

The 318 Urban Street Site ("the Site") is located in Buffalo, New York (Figure 1). This location is approximately three and one-half miles east of Lake Erie and two and one half miles from downtown Buffalo.

The facility consists of two buildings located on approximately 2.25 acres of relatively flat properly. The Site is located in an urban area which includes residential and commercial land use.

1.1.2 SITE HISTORY

Previously obtained information about the 318 Urban Street Site indicates the following:

- The title of the property is currently held by the Erie County Industrial Development Agency (Erie County IDA) in care of Pyramid Steel. Pyramid Steel presently uses the plant and property under an agreement with the Erie County IDA, who purchased the property from Production Efficiency Corp. in 1985.

- Production Efficiency Corp. purchased the property from General Electric Corp. in 1977 and owned it until 1985.

- General Electric owned the property from 1921 until 1977. Under GE's ownership, the facility was operated as an apparatus service center from 1921 to 1968. Operations on-site during that time consisted of servicing and repair of industrial and utility equipment including electric transformers.

1.2 SELECTED REMEDIAL ALTERNATIVE

Based upon previous Remedial Investigations performed and the Feasibility Study prepared for the 318 Urban Street Site, the DEC has selected a remedy involving the excavation and off-site landfilling of contaminated soils. The components of the remedy are as follows:

- Decontamination of the main building and the demolition and disposal of the smaller storage building located on the Site.

- Excavation and off-site disposal of soil exceeding the remediation goals (1 and 10 parts per million PCBs) at a permitted landfill.

- Backfilling the excavations with clean, imported soil or soil from other areas of the Site which contains PCBs at concentrations below the remediation goals. Deep excavations might be backfilled with soil containing up to 10 parts per million (ppm) PCBs while the top 12 inches of backfill must contain less than 1 ppm PCBs.

- Covering excavated areas with topsoil and seeding.

- Flushing and vacuuming of certain portions of sewers on French Street and Moselle Street; transportation of the collected sediments and water to an off-site facility for treatment and/or disposal.

- Implementation of a monitoring program which will allow the effectiveness of the preferred remedy to be assessed.

To maintain the structural stability of the main building foundation, some contaminated soil will remain below ground surface. This will be covered with a high density plastic liner and clean soil. Deed restrictions will be pursued to preclude future on-site construction which might disturb this remaining soil.

1.3 PURPOSE OF THE RD/RA WORKPLAN

The RD/RA Workplan outlines the activities to be performed during the implementation of the ROD. Specifically, the following will be detailed:

- cleanup levels which will be used for building decontamination and soil remediation;
- areas which will be cleaned or removed under the building decontamination process;
- areas of soil which will be excavated under the soil remediation process;

2.0 *PRE-DESIGN ACTIVITIES*

No pre-design sampling or analysis is proposed under this Workplan. The only area where delineation has not been completed is the valve box which contained sludge with PCB concentrations. Previous attempts at sampling the soils immediately surrounding this box were unsuccessful. GE will excavate soil surrounding the box to PCB concentrations less than 10 ppm. Also, GE does not plan to conduct further soil sampling in the area of the manhole at 289 French Street. This manhole will be replaced as part of the on-site sewer replacement program.

There will be no development of a remedial activity Health and Safety Plan as a pre-design step. The Health and Safety Plan utilized by the contractor during remedial activities will be the responsibility of the contractor to prepare.

3.0 DESIGN ACTIVITIES

3.1 REMEDIAL DESIGN OF BUILDING DECONTAMINATION

Results of Site investigations conducted at the 318 Urban Street facility indicate that some of the interior surfaces such as the main workshop floor, the floor above the break room, general interior surfaces and roof areas have low level PCB contamination. Design drawings and a specification package will be developed to detail the proper clean-up of these areas, as described below.

The primary purpose for the building decontamination work is to remove or decontaminate some machinery, superstructure, windows, doors, floors, floor drains, an air handling unit, exhaust fan surfaces, roof areas and other building surfaces for the main building.

Surfaces within the building which have been identified as requiring remediation are:

- The air handling unit;
- Floor drains in the restrooms;
- The wood floor above the breakroom on the east side of the building; and
- Wood block floor in the main shop area.

In addition to the above items, the following areas will also be remediated:

- The concrete floor areas in the main shop area;
- The air exhaust stack from the air handling unit;
- The walls, doors, windows, stairways, shelving and superstructure of the building, including office space, as required; and
- The exterior surfaces of machinery (not placed in the facility solely for storage); and
- selected roof areas

The cleanup objective for impervious surfaces will be 10 ug PCBs/100 sq.- cm. as measured from wipe samples. Any roof areas which cannot be cleaned will be resealed.

As described in Section 3.5 of this Workplan, technical specifications will be written and design drawings developed to be used in a bid package for the building decontamination work.

3.2 REMEDIAL DESIGN OF SOIL REMEDIATION

Soil remediation will be performed in the areas detailed in Figure 2, as approved in the NYSDEC Record of Decision for the 318 Urban Street Site for the selected alternative, *Alternative #4: Excavation and Off-Site Landfilling.*

The following activities are included in the selected remedy :

- Demolition and disposal of the on-site garage to expose soil below the garage;
- Excavation of soil exceeding the remedial goal (1 ppm in the upper one foot of soil and 10 ppm PCBs at depths below one foot) and disposal at a TSCA permitted landfill;
- Backfilling excavations with clean soil, or with surface soil from other Site areas that is below the remediation goal;
- Covering the sloped sides of the excavation adjacent to the main plant where soil containing PCBs exceeding the remediation goal will remain with HDPE and clean soil; and
- Site restoration

As described in Section 3.5 of this Workplan, technical specifications will be written and design drawings developed to be used in a bid package for the soil remediation work.

3.3 OFF-SITE SEWER FLUSHING

Off-site sewers will be flushed and vacuumed in areas to meet the objectives specified in the NYSDEC Record of Decision for the 318 Urban Street Site.

The following activities are included in this task:

- Flushing and vacuuming of off-site sewer sections. The limits of this remedial action will extend from the end of the previously cleaned section of on-site sewer to French Street, downstream to Moselle and continue to Moselle and East Ferry.

- Contaminated sediments in sewers west of the Site, beneath the railroad tracks to East Ferry, will also be removed and disposed.

- Water and sediments collected having contamination levels above acceptable limits will be treated and disposed of by a permitted treatment disposal facility.

As described in Section 3.5 of this Workplan, technical specifications will be written and design drawings developed to be used in a bid package for the off-site sewer flushing work.

3.4 ON-SITE SEWER REMOVAL AND REPLACEMENT

Removal and replacement of existing on-site sewer system will be performed to satisfy NYSDEC Record of Decision for the 318 Urban Street Site as follows:

- Remove existing sewer system and dispose of at a permitted treatment disposal facility;
- Characterize soil for proper management utilizing original fill where possible;
- Replace components of the existing sewer system so as to provide the required service needs of the facility;
- Backfilling the excavations with clean, imported soil;

As described in Section 3.5 of this Workplan, technical specifications will be written and design drawings developed to be used in a bid package for the on-site sewer removal and replacement work.

3.5 TECHNICAL SPECIFICATIONS AND DESIGN DRAWINGS

Technical specifications and design drawings will be developed to be utilized in a bid package to cover the previously discussed remedial actions. These packages will be used in the selection of the contractor to perform the building decontamination, soil remediation, sewer flushing and sewer line replacement at 318 Urban Street.

3.6 CITIZEN PARTICIPATION PLAN

As part of the remedial process, a Citizen Participation Plan, dated October 16, 1992, was developed for the Urban Street Site. The objectives of the plan are to: promote public understanding of the NYSDEC's responsibilities, planning and remedial activities; provide opportunities for the NYSDEC to learn of public concerns about the project; and provide information that will facilitate a comprehensive remedial program protective of both public health and the environment.

The following public participation activities have been conducted as part of the project:

- A Citizen Participation Plan dated May 19, 1992 (revised October 16, 1992) was developed .
- Document repositories were established at the following locations:

  C.R.U.C.I.A.L. Center
  1609 Genesee Street
  Buffalo, NY

  East Delevan Branch Library
  1187 East Delevan Street
  Buffalo, NY

This plan will continue to be utilized during implementation of the remedial actions for the 318 Urban Street Site.

3.7 COMMUNITY HEALTH AND SAFETY PLAN

A Community Health and Safety Plan was previously developed for the Site as part of the Immediate Remedial Measure (IRM) Workplan for the excavation of soil on residential properties. This plan will be used as the Community Health and Safety Plan for the current remedial operations.

The non-visible levels of dust will be continuously monitored during excavation activities with use of a portable dust monitor. Monitoring will be conducted in the breathing space of those working on the excavation equipment and at the upwind and downwind property lines. The measured dust concentrations will be used as action level criteria for upgrading or downgrading protective equipment. Specific criteria for action levels are as follows:

The OSHA Permissible Exposure Limit (PEL) for occupational exposure for respirable particulates is 5 mg/m^3 Time Weighted Average (TWA). If this level is exceeded, work will cease until dust control measures can be implemented.

The OSHA PEL for chlorinated biphenyl (54% chlorine) is 0.5 mg/m^3 TWA. The PCB concentrations in the majority of the soils to be excavated do not exceed 10 ppm. If the PEL for particulates is exceeded, the diluted concentrations of the PCBs in the soil will make it highly unlikely that the PEL for PCBs will also be exceeded. However, in the area south of the western half of the building, between the building and Urban Street, maximum concentrations of PCBs in some of the soils to be excavated exceed 30,000 ppm. Even so by employing the PEL for particulates as the action level, a comfortable (3.3 times) safety margin can be maintained if used in conjunction with dust suppression methods.

3.8 ON-SITE CONTINGENCY PLAN

The on-site Contingency Plan outlines the procedures to be followed to minimize potential accidental exposures to residents of the surrounding community due to airborne dust during soil excavation activities. The following actions will be taken to reduce the likelihood of an accidental exposure:

- Air monitoring will be performed prior to the start of excavation activities. The NIOSH 5503 method will be used with a 13 mm polypropylene cassette equipped with a glass filter. The sampling will be continuously run for 8 hours to determine background levels of dust and PCB content. The sample will be analyzed by GC-ECD for total dust;

- Dust monitor readings above action limits set by the cited OSHA standard will require immediate cessation of excavation activities and the employment of

additional fugitive dust suppression techniques. Only one area at a time will be excavated to minimize releases to the air and to allow for suppression actions to protect the residents, if warranted;

- Sufficient precautions will be taken to prevent loose soils from adhering to tire treads, wheel wells, etc. of on-site vehicles to minimize decontamination requirements and to ultimately prevent the migration of soil to off-site areas and streets;

- If an excavation is to remain open after working hours, a polyethylene cover will be used to cover the excavation. The excavation will be wetted, if necessary, to prevent dust generation;

- To the greatest extent possible, all soil removed from the excavation will be placed directly into dump trucks or dumpsters, covered and hauled from the Site. The staging of soil in piles will be minimized;

- During excavation activities a monitoring device will be placed at the property line nearest to the excavation to monitor for the generation of dust during excavation. If necessary, field personnel will follow behind the excavators to wet the ground surface with a garden hose, thereby further reducing the potential for fugitive dust generation. If exceptionally high levels of emissions are noticed or measured, additional personnel will be utilized for dust suppression activities, as appropriate;

- A security guard will be stationed on-site after working hours to ensure that no unauthorized personnel access the Site.

A Health and Safety Officer will be on-site at all times during excavation activities. The officer will utilize a dust monitor which provides a continuous readout for the duration of the work day. His/her duties will include the calibration of the

samplers to ambient conditions each morning, monitoring the operation of the samplers, and evaluating Site conditions. Whenever visible emissions are produced or the sampler alarm indicates that conditions have exceeded established standards, the officer will be responsible for recommending the implementation of additional fugitive dust suppression techniques, if required.

3.9 TRANSPORTATION CONTINGENCY PLAN

The proposed route for hauling the excavated soil was chosen to minimize the potential for a spill to occur in a residential area and to direct the waste haulers to the interstate system as directly as possible. The proposed route is as follows: Drivers are to exit the Site from Urban Street and head directly south onto Barthel Street. Drivers should continue on Barthel Street until it intersects with Walden Avenue and then head east on Walden. Drivers should then continue east on Walden Avenue until it intersects with Interstate Route 90 at Interchange 52. Drivers then should proceed on the interstate highway system to their final destination.

The following is the proposed contingency route: Drivers are to exit the Site from Urban Street and head directly south onto Barthel Street. Drivers should continue on Barthel Street until it intersects with Walden Avenue and then head west on Walden. Drivers should then continue west on Walden Avenue until it intersects with the Kensington Expressway (Route 33). Drivers should proceed onto the expressway and head east to Interstate Route 90 at Interchange 51. Drivers then should proceed on the interstate highway system to their final destination.

3.10 AIR MONITORING PLAN

An Air Monitoring Plan was previously developed for the Site as part of the Immediate Remedial Measure (IRM) Work plan for the excavation of soil on

Residential properties. This plan will be used as part of the Community Health and Safety Plan for the current remedial operations.

4.0 *REMEDIAL ACTION CONSTRUCTION*

This section describes soil excavation and related remediation procedures to be followed during the remedial action. Plans to control access to the Site and establish work zones are presented in the community Health and Safety Plan (HASP). Plans for soil excavation, post-excavation activities, backfilling of excavated areas and equipment decontamination are presented below.

4.1 *REQUIREMENTS*

Remedial construction activities will be performed to achieve the objectives set forth in the ROD.

4.2 *PERFORMANCE OF REMEDIAL ACTION CONSTRUCTION*

Procedures used for the remedial action for 318 Urban Street will follow the excavation protocols previously developed and approved by the NYSDEC for the IRM in June 1992, as detailed below. The one exception to the previously used protocols will be the the sampling of the bottom of excavations to confirm that cleanup objectives have been met. A portion of these samples will be field analyzed using the same test kits and protocols as previously utilitzed during the IRM activities. Quality Assurance/Quality Control measures for this sampling/analyses will include analyzing duplicates of ten percent of these samples at an off-site certified laboratory.

4.2.1 *EXCAVATION*

Equipment to be used during the soil excavation activities will be determined by the contractor. Only experienced equipment operators will operate the heavy machinery.

The on-site construction engineer or designee will oversee all excavation work. Surveying equipment will be used to maintain vertical control of the excavations, when required. The excavated soil will be stockpiled or loaded into dump trucks or dumpsters.

Each truck load or dumpster of contaminated soil leaving the Site will pass through a decontamination station for cleaning, if required. Additionally, all loaded trucks or dumpsters must have their loads covered prior to entering the decontamination station.

Following excavation, clean top soil will be backfilled into the excavation and compacted. It is anticipated that the fill will be obtained from a local topsoil supplier and this source will be identified prior to commencement of excavation activities. Analysis of the topsoil will be performed to ensure it is free of contamination and adequate for the establishment of ground cover. Some soil excavated from areas on the Site with PCB concentrations below 10 ppm will also be used as fill material at depths greater than one foot.

4.2.2 WASTE MANAGEMENT

It is anticipated that excavated soil will be placed directly into dump trucks or dumpsters. However, in the unlikely event that soil will need to be stored outside of trucks or dumpsters, excavated soil will be staged temporarily on a triple layer of plastic sheeting on the 318 Urban Street Site. Soil to be stored overnight will be covered with plastic sheeting and secured. The soil pile area will be bermed so that any liquid from the soil will be confined.

Soil will be transferred into dump trailers or dumpsters for transport to the appropriate disposal facility. Trailers or dumpsters will be lined with disposable plastic sheeting. Trucks, dump trailers, and dumpsters will be prevented from entering areas of active excavation. This will be done to minimize the potential

spread of contamination and to minimize vehicle decontamination efforts. All contaminated soil will be disposed of by land burial at appropriately permitted facilities.

Decontamination water will be pumped from the decontamination pad and into temporary tanks or drums. All tanks and drums will be labeled as to contents.

4.2.3 CLEANUP / DEMOBILIZATION

Final decontamination of equipment and demobilization will begin after soil remediation work is completed. All equipment will be thoroughly decontaminated before leaving the Site. Contaminated disposable materials will be containerized and disposed of in the same manner as the contaminated soil. Non-contaminated used disposable equipment will be collected and disposed of as normal refuse.

4.2.4 SITE RESTORATION

Fencing and other structures removed or damaged during the excavation activities will be repaired or replaced.

5.0 *PROGRESS MONITORING AND REPORTING*

5.1 *PROJECT MANAGEMENT AND RESPONSIBILITIES*

Support for the Remedial Measures will be performed by a New York State engineer (Engineer) for GE. The Engineer will be responsible for supervising the work described in this Workplan in accordance with the project schedule and the requirements of this Workplan.

Project Manager - The Project Manager is the person duly appointed to act in a supervisory capacity over designated employees and activities. The Project Manager is responsible for ensuring that health and safety responsibilities are carried out in conjunction with the Site operations. The Project Manager is responsible for making certain that the work plan is duly implemented and that quality assurance is maintained for all remediation activities.

Construction Manager - The Construction Manager is the person duly appointed to conduct field and related activities under the supervision of the Project Manager. The Construction Manager is responsible for ensuring that health and safety responsibilities are carried out on the Site. The Construction Officer may also be the Site Safety Officer.

5.2 *PROGRESS MONITORING AND DOCUMENTATION*

Thorough, detailed documentation of project activities is required for a project of this scope and importance. The Engineer will maintain complete documentation of all project activities so that decision process, resulting actions and results can be recreated as needed. As such, a history of the project will be maintained.

Documentation or remedial activities for various aspects of the project will be accomplished by record keeping previously described in the approved Work Plan For IRM For Off-Site Properties (October 13, 1992).

5.2.1 FIELD ACTIVITIES

5.2.1.1 FIELD NOTES

Field notes will be maintained throughout the Site remediation. The overall chronology of field activities as well as sampling details will be recorded in a bound notebook with an indelible ink marker on consecutive pages which will be numbered in ink. The field notebook will not be altered for any reason. The following information will be documented in the field notebook:

- date
- weather conditions
- personnel on or visiting Site
- subcontractors on-site
- work performed
- time at which work, sampling or analysis was performed
- equipment calibration methods and time
- problems with personnel or machinery
- post-excavation sample collection information
- field analysis methods and data
- field observations

5.2.1.2 WEEKLY REPORTS

The daily field logs will be summarized on weekly report forms which will be presented to the Project Manager.

5.2.1.3 CALIBRATION RECORDS

Calibration activities for all field instrumentation will be maintained in a calibration log.

5.2.1.4 SAFETY FORMS

Sign-in forms, levels of protection, air monitoring results, incident reporting forms and other safety related forms will be maintained in a project safety notebook.

5.2.1.5 CHAIN-OF-CUSTODY FORMS

All sample handling will be recorded on chain-of-custody forms and associated labels and custody seals.

5.3 PROGRESS MEETINGS

Weekly meetings will be held at 318 Urban Street between the Engineer and the contractor. The DEC will be notified of the time and date for each of these meetings.

5.4 UNFORESEEN AND EMERGENCY CONDITION NOTIFICATION

Upon discovery of an unforeseen and emergency condition, all construction work in the area will be stopped until an evaluation of the health and safety aspects is performed. The DEC will be notified on the condition and the results of the evaluation. Work will proceed when clearance is given by the Site Safety Officer.

5.5 *FIELD CHANGES*

All field changes will be verbally discussed with NYSDEC personnel. Results of these discussions will be documented for GE and the NYSDEC.

5.6 *WORK SCHEDULE*

ERM has developed a project schedule which allows for expedient completion of all remedial tasks described herein. Adherence to the project schedule is contingent upon the cooperation of all parties involved in the remediation including: ERM, the Engineer, GE, the property owner and operator, NYSDEC, and other regulatory agencies.

The project schedule will be as follows:

Dec. 15	Submittal of Specification Packages for Building Decontamination and Demolition to the NYSDEC
Feb. 1	NYSDEC review completed of Specification Packages
Feb. 15	Final bid documents distributed
April 15	Remedial action to begin
August 30	Remedial actions completed
October 15	Final report submittal

6.0 *POST-REMEDIAL ACTIVITIES*

6.1 *POST-CONSTRUCTION SUMMARY REPORT*

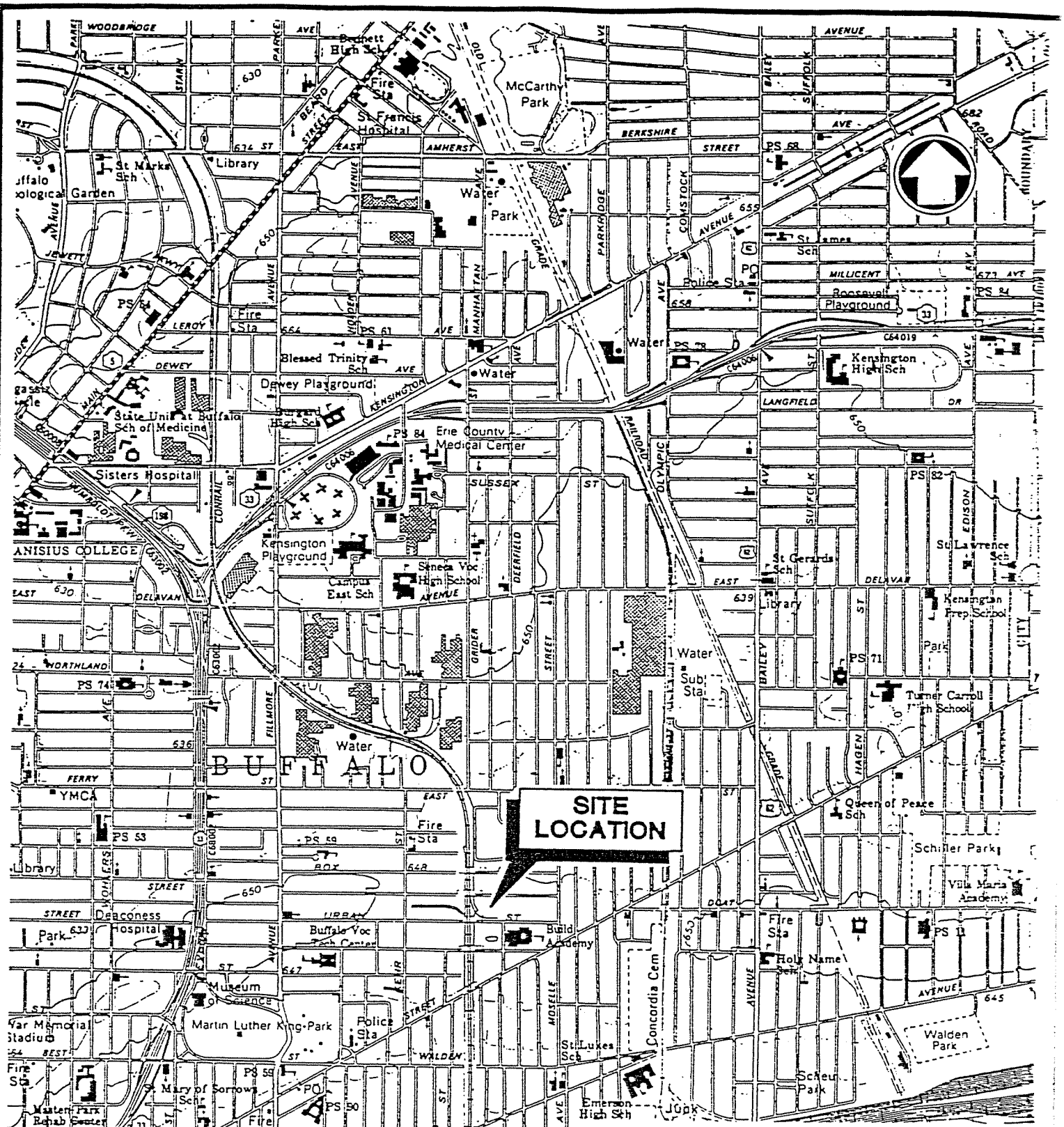
All activities taking place will be documented and included in a Post-Construction Summary Report. The report will include soil excavation details and building decontamination.

The Post-Construction Summary Report will include surveyed maps of the facility and property topography and activities maps displaying the locations of field activities. Also, included in the report will be the following:

- summaries of monitoring data;
- summaries of all post-excavation and wipe sample results;
- pertinent correspondence and references; and
- manifests of hazardous waste shipped off-site.

6.2 *REMEDIAL ACTIONS CONTINGENCY PLAN*

The Remedial Action Contingency Plan will be implemented if a determination is made after completion of the remedial activities that these activities did not meet the objectives for remediation of the Site as set for in the ROD. If this should occur, the responsible parties will meet with the NYSDEC and other involved agencies to attempt to mitigate the situation.



TITLE

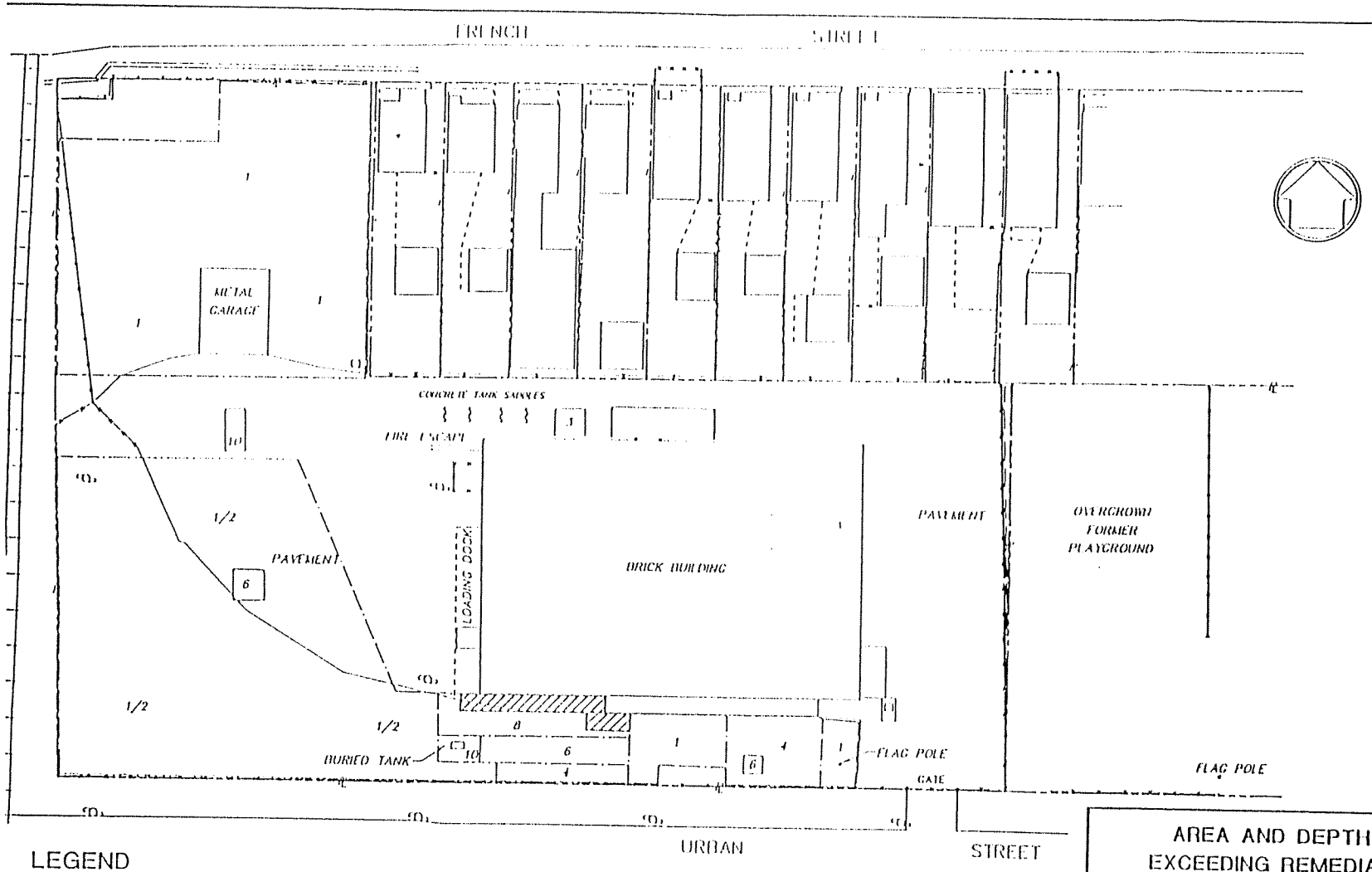
SITE LOCATION MAP

PREPARED FOR

GENERAL ELECTRIC COMPANY CEP

ERM ERM-Northeast Environmental Resources Management

SCALE	FIGURE
1":2000	1
DATE 9/91	



LEGEND

- UTILITY POLE LOCATION
- PROPERTY LINE
- FENCE LINE
- 6 — AREA OF SOIL EXCEEDING REMEDIATION GOAL (WITH DEPTH IN FEET)
- AREA OF SLOPED EXCAVATION ADJACENT TO BUILDING FOUNDATION

AREA AND DEPTH OF PCBs EXCEEDING REMEDIATION GOAL

FEASIBILITY STUDY

318 URBAN STREET SITE, BUFFALO, NY

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Environmental Resources Management