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September 12, 2016

Jessica LaClair
New York State Department of Environmental Conservation
Division of Environmental Remediation
Remedial Bureau D
625 Broadway, 12th Floor
Albany, NY 12233-7013
One electronic copy

**Re: *Interim Site Management Plan
GE Parts and Repair Service Shop
Tonawanda, New York 14150
NYSDEC Site ID: 915244
EPA ID: NYD067539940
Permit ID: 9-1464-00044/00001***

Dear Ms. LaClair:

Attached please find an Interim Site Management Plan (ISMP) for the above referenced site. This ISMP has been prepared in partial fulfillment of the requirements in the Statement of Basis for GE Buffalo Service Shop, Tonawanda, Erie County, New York, dated March 19, 2012. If you have any questions or comments on the attach document, please contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Lewis S. Streeter'.

Lewis S. Streeter
Senior Project Manager

Enclosures

cc: Roger Florio, GE, (via email without enclosures)
Doug Weeks, Arcadis, with enclosures

**BUFFALO SERVICE SHOP
GENERAL ELECTRIC COMPANY
TONAWANDA, NEW YORK**

INTERIM SITE MANAGEMENT PLAN

NYSDEC Site Number: 915244

EPA ID#: NYD067539940

Prepared for:

General Electric Company
319 Great Oaks Boulevard
Albany, New York

Prepared by:

Arcadis of New York, Inc.
855 Route 146, Suite 210
Clifton Park, New York

Revisions to Final Approved Interim Site Management Plan:

Revision No.	Date Submitted	Summary of Revision	NYSDEC Approval Date

SEPTEMBER 2016

CERTIFICATION STATEMENT

I, _____, certify that I am currently a New York State registered professional engineer and that this Interim Site Management Plan was prepared in accordance with applicable statutes and regulations.

_____ P.E.

_____ DATE

**BUFFALO SERVICE SHOP
GENERAL ELECTRIC COMPANY
TONAWANDA, NEW YORK**

INTERIM SITE MANAGEMENT PLAN

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List of Acronyms

AOC	Area of Concern
AST	Aboveground Storage Tank
BGS	Below Ground Surface
CFR	Code of Federal Regulations
CM	Corrective Measures
CMCFR	Corrective Measure Completion Final Report
CMID	Corrective Measure Implementation Design
CMIP	Corrective Measure Implementation Plan
DER	Division of Environmental Remediation
DKP	DKP Buffalo, LLC
EC	Engineering Control
EWP	Excavation Work Plan
GE	General Electric Company
IC	Institutional Control
ISMP	Interim Site Management Plan
µg/cm ²	Micrograms per Square Centimeter
mg/kg	Milligram Per Kilogram
NAVD88	North American Vertical Datum 1988
NYCRR	New York Codes, Rules and Regulations
NYS	New York State
NYSDEC	New York State Department of Environmental Conservation
NYSDOT	New York State Department of Transportation
PCB	Polychlorinated Biphenyl
ppm	Part Per Million
PRR	Periodic Review Report
RCRA	Resource Conservation and Recovery Act
RFI	RCRA Facility Investigation
RSCO	Recommended Soil Cleanup Objective
SWMU	Stormwater Management Unit
TSCA	Toxic Substances Control Act
URS	URS Corporation – New York
USEPA	United States Environmental Protection Agency
VOC	Volatile Organic Compound

ES EXECUTIVE SUMMARY

The following provides a brief summary of the controls implemented for the Site, as well as the inspections, monitoring, maintenance, and reporting activities required by this Interim Site Management Plan (ISMP):

Site Identification: EPA ID#: NYD067539940
 NYSDEC Site #: 915244
 GE Buffalo Service Shop
 Tonawanda, New York

Institutional Controls (ICs):	1. The property may be used for industrial/commercial use.
	2. ICs include an Environmental Easement with land use and groundwater restrictions.
	3. All Engineering Controls (ECs) must be inspected at a frequency and in a manner defined in this ISMP, and maintained as needed.
Engineering Controls:	1. Fencing/access control.
	2. Epoxy coating on sections of the concrete floor within the continuously used/occupied portions of the on-site building.
	3. Asphalt pavement in the Transportation Corridor.
	4. Site cover (buildings, pavement, or demarcation fabric and at least 1 foot of soil cover).
Inspections:	Frequency
1. Fencing/access control inspection	Annually
2. Epoxy floor coating	Annually (When Occupied)
3. Asphalt pavement	Annually
Monitoring:	
1. Groundwater monitoring (separate plan for limited groundwater monitoring)	Semiannually for three consecutive events, followed by annually for three years
Maintenance:	
1. Fence/access maintenance	As needed
2. Epoxy floor coating	As needed

3. Asphalt pavement	As needed
Reporting:	
1. Periodic Review Report	Every three years
2. Site Inspection Report	Annually

Further descriptions of the above requirements are provided in detail in the latter sections of this ISMP.

1.0 INTRODUCTION

1.1 General

This Interim Site Management Plan (ISMP) was prepared by Arcadis of NY, Inc., on behalf of GE, and is a required element of the Corrective Measure (CM) Program for the General Electric Company (GE) Buffalo Service Shop site located at 175 Milens Road in Tonawanda, New York (hereinafter referred to as the “site”), as shown on **Figure 1**. The site is currently in the New York State (NYS) Resource Conservation and Recovery Act (RCRA) Corrective Action Program, which is administered by the New York State Department of Environmental Conservation (NYSDEC). The site is identified as United States Environmental Protection Agency (USEPA) ID# NYD067539940 and is also known by NYS Site Number 915244.

This ISMP has been prepared in partial fulfillment of the requirements for Corrective Action specified in 6 New York Codes, Rules, and Regulations (NYCRR) Part 373 Hazardous Waste Management Permit (373 Permit) issued by NYSDEC on July 5, 2012. The 373 Permit (Permit ID 9-1464-00044/00001) was issued under the RCRA program and requires GE to perform corrective measures at the site. Because the Part 373 Permit requires GE to perform additional investigation when inaccessible sub-slab soils become accessible, this document is therefore being completed as an ISMP. A final SMP will be submitted subsequent to conducting Final Corrective Measures in sub-slab soils

A Corrective Action Program has been ongoing at the site in accordance with the May 1996 Hazardous Waste Management Permit and the subsequent July 2012 Corrective Action Permit. The original permit allowed storage of hazardous wastes that contained volatile organic compounds (VOCs), metals, and/or polychlorinated biphenyls (PCBs) at the site. There has been no treatment or disposal of hazardous or solid wastes at the site. Both the RCRA Container Storage Area and the PCB Storage Area were closed in accordance with approved closure plans. In accordance with the 1996 373 Permit, site assessment and investigation (Section 2.3) were undertaken, several interim corrective measures were performed, and potential corrective measures were evaluated. The Statement of Basis for selection of the final remedy was published for public comment in late 2011, and in March 2012, the NYSDEC made a determination on the final corrective measures.

The selected remedy, as presented in the Statement of Basis, included the following: excavation of contaminated surface soils that exceed 1 part per million (ppm) of PCB and excavation of contaminated subsurface soils that exceed 10 ppm of PCB, to a maximum depth of six feet in the areas surrounding the rail spur, old oil/water separator, sewer lines, and former rinse water tank excavation (approximately 1,570 cubic yards of soil). The July 2012 373 Permit is a corrective action only permit that incorporates those measures and requires GE to perform additional investigation when inaccessible sub-slab soils become accessible (NYSDEC 2011).

In accordance with the July 2012 373 Permit, a Corrective Measure Implementation Plan (CMIP) was prepared by URS Corporation – New York (URS) on behalf of GE and approved by NYSDEC on November 13, 2012. Following a series of pre-design investigations, a Corrective Measure Implementation Design (CMID) Report was prepared by AECOM on behalf of GE, and was submitted to NYSDEC on January 16, 2015. NYSDEC approved the design with comments in a letter dated February 23, 2015. The corrective actions were generally completed from August to December 2015, with

follow-up punch list and restoration activities completed in the spring of 2016. A Revised Corrective Measure Completion Final Report (CMCFR) was prepared and submitted to NYSDEC on June 21, 2016. NYSDEC approved the CMCFR in a letter dated June 27, 2016.

The CMCFR (AECOM 2016) documents that corrective measures for the site were implemented in substantial compliance with the NYSDEC-approved plans presented in the October 2, 2012 CMIP and the January 16, 2015 CMID Report. The cleanup levels achieved are generally consistent with industrial/commercial use. After completion of the remedial work described in the CMCFR, some contamination remains at the site, which is hereafter referred to as “residual impacts.” Institutional and Engineering Controls (ICs and ECs) have been incorporated into the site remedy to control exposure to residual impacts for protection of public health and the environment. An Environmental Easement recorded with the Erie County Clerk requires compliance with this ISMP and all ICs and ECs placed on the site. A copy of the Environmental Easement is provided in **Appendix A**.

This ISMP was prepared for the management of residual impacts at the site until the Environmental Easement is extinguished. Compliance with this plan is required by the grantor of the Environmental Easement and the grantor’s successors and assigns.

This ISMP details the site-specific implementation procedures required by the Environmental Easement. Failure to comply with this ISMP is a violation of the Environmental Easement and Environmental Conservation Law, and thereby subject to applicable penalties. This ISMP may be revised only with the approval of NYSDEC.

Reports associated with the site can be viewed by contacting NYSDEC or its successor agency managing environmental issues in New York State. A list of contacts involved with the site is provided in **Appendix B** of this ISMP.

The guidance for the development of a site management program found on NYSDEC’s website, including the August 2015 ISMP Template, and NYSDEC’s Division of Environmental Remediation (DER)-10 (Technical Guidance for Site Investigation and Remediation) dated May 2010, were used in preparing this ISMP. This ISMP addresses the means for implementing the ICs/ECs required by the Environmental Easement for the site.

1.2 Revisions

Revisions to this ISMP will be proposed in writing to the NYSDEC Project Manager. In accordance with the Environmental Easement for the site, NYSDEC will provide a notice of any approved changes to the ISMP, and append these notices to the ISMP that is retained in its files.

1.3 Notifications

Notifications will be submitted by the property owner to NYSDEC, as needed, for the following reasons:

- 60-day advance notice of any proposed changes in site use that are required under the terms of the Environmental Easement, 6 NYCRR Part 375 and/or Environmental Conservation Law.

- 7-day advance notice of any field activity associated with the remedial program.
- 15-day advance notice of any proposed ground-intrusive activity pursuant to an Excavation Work Plan (EWP).
- Notice within 48 hours of any damage or defect to the foundation, structures, or EC that reduces or has the potential to reduce the effectiveness of an EC, and likewise, any action to be taken to mitigate the damage or defect.
- Verbal notice by noon of the following day of any emergency, such as a fire, flood, or earthquake, that reduces or has the potential to reduce the effectiveness of ECs in place at the site, with written confirmation within 7 days that includes a summary of actions taken, or to be taken, and the potential impact to the environment and the public. Follow-up status reports on actions taken to respond to any emergency event requiring ongoing responsive action submitted to NYSDEC within 45 days describing and documenting actions taken to restore the effectiveness of the ECs.

Notifications required under the 373 Permit Module II.B.10, consisting of the following:

- 15-day notice of any discovery of hazardous constituents in groundwater that may have been released from a stormwater management unit (SWMU) or area of concern (AOC) at the site or that may have migrated beyond the site boundary in concentrations that exceed applicable action levels.
- 15-day notice of any discovery of hazardous constituents in air that may have been released from a SWMU or AOC at the site have or are migrating to areas beyond the site boundary in concentrations that pose a threat to human health, where residences or other places at which continuous, long-term exposure to such constituents might occur are located within such areas.
- 15 day notification of any additional SWMUs and/or AOCs identified during the course of groundwater monitoring, field investigations, environmental assessments, or other means.

Any change in the ownership of the site or the responsibility for implementing this ISMP will include the following notifications:

- At least 60 days prior to the change, NYSDEC will be notified in writing of the proposed change. This will include a certification that the prospective purchaser/Remedial Party has been provided with a copy of the Environmental Easement, and all approved work plans and reports, including this ISMP.
- Within 15 days after the transfer of all or part of the site, the new owner's name, contact representative, and contact information will be confirmed in writing to NYSDEC.
- Application of permit transfer will be submitted before transfer of ownership (373 Permit General Condition #6).

Table 1 includes contact information for the above notification requirements. The information in this table will be updated as necessary to provide accurate contact information. A full listing of site-related contact information is provided in **Appendix B**.

Table 1: Recipients of Notifications*

Name	Contact Information
Jessica LaClair NYSDEC Project Manager	518 402-9821; jess.laclair@dec.ny.gov
Kathleen Emery NYSDEC Regional HW Engineer	716 851-7220; kathleen.emery@dec.ny.gov
NYSDEC Site Control	[phone - TBD] [email address - TBD]

* Note: Notification recipients are subject to change and will be updated as necessary.

2.0 SUMMARY OF PREVIOUS REMEDIAL INVESTIGATIONS AND ACTIONS

2.1 Site Location and Description

The site is located at 175 Milens Road in the Town of Tonawanda, Erie County, New York. The site is an approximately 5.83-acre parcel and is located in a mixed industrial/commercial area. The site is bounded to the north by Interstate Route 290, which is owned by the New York State Department of Transportation (NYSDOT), and by land owned by Lamar Advertising, which maintains an advertising billboard on its property. To the east, the site is bounded by property owned by DKP Buffalo, LLC (DKP) and by property owned by Niagara Mohawk. The south side of the site is also bounded by property owned by DKP. The west side of the site is bounded by Milens Road and property owned by Coca-Cola Company. The boundaries of the site are more fully described in **Appendix A**. The owner of the site at the time of issuance of this ISMP is GE.

2.2 Physical Setting

2.2.1 Land Use

The site was developed by GE in 1968 and 1969 for use as a service center to repair industrial equipment such as electric motors, transformers, turbines, pumps, and compressors. The original construction at the site included the northern portion of the existing building. An addition to the south end of the building was constructed in 1978. The site is now secured with a chain link fence and gate, and is improved with a 69,000-square-foot, slab-on-grade building. A rail spur extends from the northeast corner of the building toward Military Road east of the site.

GE generated hazardous wastes during routine operations at the site. While the May 1996 373 Permit allowed GE to store hazardous wastes that contained VOCs, metals, and PCBs, it did not allow for, and GE did not perform, the treatment or disposal of hazardous or solid wastes at the site. Prior to off-site disposal, the wastes were stored in either the RCRA Container Storage Area, which was on the east side of the building, or the Commercial PCB Storage Area, which was inside, in the southeast corner of the building. The RCRA Container Storage Area was closed in 2002, as documented in the RCRA Closure Certification Report (URS 2002), which was submitted to NYSDEC and USEPA on September 19, 2002; however, the structure itself is still present and is currently used for storage of miscellaneous items. The Commercial PCB Storage Area was closed in 2000, as documented in the Commercial PCB Storage Area Closure Certification Report (URS 2006) submitted to USEPA and NYSDEC on April 11, 2006. No additional remedial measures are necessary for the storage areas. **Figure 1** illustrates the site features.

2.2.2 Geology and Hydrogeology

The site is relatively flat at an elevation of approximately 610 to 613 feet relative to the North American Vertical Datum 1988 (NAVD88). The soils underlying the site consist of very dense glaciolacustrine sediments, which are predominantly clays and silts. These sediments are approximately 60 to 70 feet thick. The depth to groundwater in native site soils is approximately 25 feet below ground surface (bgs). Discrete areas of shallow perched groundwater may be present at the site at a depth of six to nine feet bgs in isolated areas of fill within utility corridors.

2.3 Investigation and Remedial History

A series of investigations have been performed at and near the site under the Corrective Action Program. A RCRA Facility Investigation (RFI) was completed in 1988. The result of the RCRA RFI and supplemental investigations led to the implementation of several interim corrective measures, the development of corrective action objectives, and the evaluation of potential corrective measures. During sampling performed in conjunction with closure of the Commercial PCB Storage Area, PCB impacts to the Transportation Corridor, depressed dock, and truck bay were discovered and delineated (with the exception of a portion of the Transportation Corridor which was inaccessible at the time due the presence of large pieces of equipment; as described below, those inaccessible areas of the Transportation Corridor were later delineated as part of the pre-design investigation). Interim corrective measures were implemented to address these impacts. At the request of NYSDEC, a Focused Corrective Measure Study was undertaken to evaluate potential corrective measures for these areas (URS 2011).

Reports summarizing the results of the investigations conducted prior to the current 373 Permit include:

- RFI Report, dated April 2, 1999, prepared by Dames & Moore
- Supplemental Sewer Investigation Report, dated April 14, 2000, prepared by Dames & Moore
- Summary of Soil Sampling Results Supplemental Investigation, dated April 23, 2001, prepared by URS
- Off-Site Storm Sewer Investigation Report, dated July 13, 2001, prepared by URS
- RCRA Closure Certification Report, dated September 19, 2002, prepared by URS
- Two Mile Creek Limited Sediment Investigation Report, dated March 20, 2003, prepared by URS
- Closure Certification Report – Commercial PCB Storage Area, dated April 11, 2006, prepared by URS
- Letter report on confirmatory sample results from Two Mile Creek, dated May 19, 2008
- August 5, 2008 letter report on additional in-creek sampling performed in July 2008
- Letter report on additional bank soil sampling along Two Mile Creek, dated September 30, 2010, prepared by AECOM

In November 2011, NYSDEC published the Statement of Basis, which summarized the project information and proposed remedy evaluation to allow the public to review the

information and participate in remedy evaluation. In March 2012, NYSDEC made a determination of final corrective measures for the site. This determination was based on the potential measures evaluated in the Revised Corrective Measure Study Final Report prepared by URS and dated July 31, 2001, and the Focused Corrective Measure Study prepared by URS and dated July 13, 2011. These final corrective measures were incorporated into the July 2012 373 Permit.

Several changes in site use occurred between preparation of the Corrective Measures Study Final Report (Dames & Moore 2000a) and selection of the final corrective measures, as documented in the CMIP prepared by URS and dated October 2, 2012. Several of the planned corrective measures were updated to reflect the modified site conditions. The CMIP also discussed informational gaps and the need for additional investigation before the design could be completed. A series of pre-design investigations were conducted during 2014 under NYSDEC-approved work plans. In summary, these investigations concluded that the extent of PCB impacts to surface soil was larger than previously defined, the concrete ramp was not impacted by PCBs, and eastern portions of the Transportation Corridor had been impacted by PCBs (URS 2014a, 2014b, 2014c, 2014e, and 2014g). The results of the investigations were summarized in letter reports to NYSDEC titled Pre-Design Investigation Data (URS 2014d) and Additional Pre-Design Investigation Data (AECOM 2015b).

The contaminants of concern identified at the site during the pre-remediation investigations included PCBs and, to a lesser extent, VOCs. The CMID Report (AECOM 2015a) presented a summary of the results of prior investigations. The selected remedy as modified through the design phase included:

- Excavation and off-site disposal of surface soil with PCB concentrations greater than 1 milligram per kilogram (mg/kg) from six areas east of the shop building, including the rail spur
- Excavation and off-site disposal of subsurface soil with PCB concentrations greater than 10 mg/kg from the former rinse water tank excavation
- Removal of the old oil water separator on the east side of the building, if feasible
- Replacement of the storm sewer line that passes through subsurface excavation areas on the east side of the building
- Removal of the sanitary storm sewer line, which was removed from service in the fall of 2012, that passes through subsurface excavation areas on the east side of the building
- Removal and off-site disposal of sediments in floor drains and trench drains
- Removal and off-site disposal of sediments in select storm drain structures at and near the site

Corrective measure implementation occurred in general accordance with the NYSDEC-approved design beginning in August 2015 and was substantially completed in December 2015. Restoration work, such as completing the reconstruction of a trench drain and establishing vegetation, continued into spring 2016. The remedial work, including the

results of a post-excavation confirmatory sampling program, was documented in the Revised CMCFR prepared by AECOM and dated June 21, 2016. NYSDEC approved the report in a letter dated June 27, 2016.

The CMCFR documents that other than three locations where site structures (aboveground storage tank [AST] containment structure and asphalt pavement) prevented additional soil removal, the site was remediated to achieve less than 1 mg/kg of PCBs, thus alleviating the need for long-term soil management in most areas (AECOM 2016). Areas of residual impacts at the site are shown on Figure 1 and are discussed in Section 2.5.

2.4 Corrective Measure Objectives

The corrective action objectives for the site, which were established in the Corrective Measures Study Task I report and approved by NYSDEC (Dames & Moore 1999b), are to:

- Remove or prevent contact with or off-site transport of sediments that contain PCBs at concentrations greater than the Recommended Soil Cleanup Objective (RSCO) of 1 mg/kg
- Remove or prevent contact with, off-site transport of, and infiltration of precipitation through surface soils that contain PCBs at concentrations greater than the RSCO of 1 mg/kg
- Remove or prevent contact with, and infiltration through, subsurface soils that contain PCBs at concentrations greater than the RSCO of 10 mg/kg
- Remove or prevent contact with, and infiltration through, subsurface soils that contain VOCs at concentrations greater than the RSCOs
- Prevent or control the migration of perched groundwater that contains PCBs or VOCs at concentrations that exceed NYS groundwater standards

Specific cleanup criteria for PCBs and VOCs detected in soil, sediments, and perched groundwater at the site were presented in the NYSDEC-approved Revised Corrective Measure Study Final Report. Additional cleanup objectives were established in the Revised Closure Plan for the Commercial PCB Storage Area prepared by URS in 2000 in accordance with the Toxic Substances Control Act (TSCA). These cleanup objectives were reiterated in the Focused Corrective Measure Study. The objective of the Revised Closure Plan (URS 2000) was to ensure that the surfaces at the site that may have been impacted by operation of the Commercial PCB Storage Area were cleaned in accordance with the levels specified in 40 Code of Federal Regulations (CFR) Part 761 Subpart G – PCB Spill Cleanup Policy. Closure-related sampling investigations indicated the presence of additional historical PCB impacts at the site, which were addressed to allow continued use of the PCB-impacted shop floor as authorized in 40 CFR Part 761.30(p), and to allow continued use of the asphalt south of the shop as a low occupancy area (40 CFR Part 761.61(a)(4)(i)(B)).

2.5 Residual Impacts

The residual impacts at the site include:

- Limited areas of subsurface soils with PCB concentrations greater than 1 mg/kg
- Impacted concrete and asphalt with PCB concentrations greater than 1 mg/kg
- Potentially impacted soils beneath site structures

Each of the areas described below are covered by soil, epoxy coating, asphalt, or a site structure to limit the potential for direct contact and infiltration of precipitation.

Surface and subsurface soil at the site was remediated to achieve 1 mg/kg or less of PCBs in soil, except for three areas where additional soil could not be removed without impacting an overlying site structure. These three areas are:

- Subsurface soil near southwest corner of ASTs: Additional soil could not be removed due to the proximity of the ASTs. A single soil sample collected in the area following excavation contained a PCB concentration of 1.2 mg/kg. Orange geotextile fabric and 12 or more inches of soil and concrete were placed over these soils.
- Soil along east edge of Transportation Corridor: Soil in the area contained up to 12.5 mg/kg of PCBs. Additional soil could not be removed without removing pavement. Geotextile fabric demarcates soil remaining under the pavement with PCBs greater than 1 mg/kg from clean fill placed in remediated areas to the east along an approximately 55-foot-long stretch.
- Along south edge of Transportation Corridor: Soil in the area contained 2.9 mg/kg of PCBs. Additional soil could not be removed without removing the pavement. Geotextile fabric demarcates soil remaining under the pavement with PCBs greater than 1 mg/kg from clean fill placed in remediated areas to the south along a 17-foot-long stretch.

In addition to the residual-impacted PCB soils remaining after the 2015 CM work, PCB-impacted concrete and asphalt remain in use at the site in accordance with the selected remedy and design. These areas include:

- Concrete floor slab (depressed dock and truck bay): The depressed dock and truck bay along with most of the concrete shop floor slab with PCB concentrations greater than 1 mg/kg or 10 micrograms per square centimeter ($\mu\text{g}/100\text{ cm}^2$). These areas are covered with an epoxy coating to prevent direct contact with impacted materials and allow continued use of the concrete slab in accordance with TSCA. **Figure 2** shows the epoxy-coated areas.
- Asphalt of Transportation Corridor: An irregularly shaped area of asphalt with PCB concentrations greater than 1 mg/kg comprising most of the paved area south of the shop. The PCB-impacted asphalt is covered by a topcoat of asphalt applied in 2004 (and later in 2015 for areas that were previously inaccessible).

Soil beneath site structures, such as the building floor slab, the AST containment structure, and the Transportation Corridor, may be impacted by PCBs. Soil in these areas

should be conservatively managed as PCB-impacted until such time that a sampling program demonstrates the soil has not been impacted by PCBs.

3.0 INSTITUTIONAL AND ENGINEERING CONTROL PLAN

3.1 General

ICs and ECs are required to protect human health and the environment because residual PCB-impacts remain at the site. This plan describes the procedures for implementation and management of ICs/ECs at the site. This plan provides:

- A description of IC/ECs on the site
- The basic implementation and intended role of each IC/EC
- A description of the key components of the ICs set forth in the Environmental Easement
- A description of the controls to be evaluated during each required inspection and periodic review
- A description of plans and procedures to be followed for implementation of ICs/ECs for the proper handling of residually impacted materials that may be disturbed during maintenance or redevelopment work on the site

3.2 Institutional Controls

A series of ICs is required by the Environmental Easement to (1) implement, maintain, and monitor EC systems; (2) prevent future exposure to residually impacted materials; and (3) limit the use and development of the site to uses permitted by the Environmental Easement. Adherence to these ICs on the site is required by the Environmental Easement and will be implemented under this ISMP. ICs identified in the Environmental Easement may not be discontinued without an amendment to or extinguishment of the Environmental Easement. The IC boundaries are equivalent to the site boundary shown on **Figure 3**. These ICs are as follows:

- The site may be used only for commercial or industrial use.
- The ICs at the site include an Environmental Easement.
- ECs must be maintained as specified in this ISMP.
- ECs must be inspected at a frequency and in a manner defined in this ISMP.
- Groundwater and other environmental or public health monitoring must be performed as defined in this ISMP or other NYSDEC-approved plan.
- Data and information pertinent to site management must be reported at the frequency and in a manner as defined in this ISMP or other NYSDEC-approved plan.
- All future activities that will disturb remaining impacted material must be conducted in accordance with this ISMP or other NYSDEC-approved plan.
- Monitoring to assess the performance and effectiveness of the remedy must be performed as defined in this ISMP or other NYSDEC-approved plan.

- Inspection and reporting on physical components of the remedy will be performed as defined in this ISMP.
- Access to the site must be provided to agents, employees, or other representatives of the State of New York with reasonable prior notice to the property owner to ensure compliance with the restrictions identified by the Environmental Easement.
- Vegetable gardens and farming on the site are prohibited.

3.3 Engineering Controls

The ECs on the site consist of fencing/access control, epoxy coating on most of the concrete floor within the on-site building, and an asphalt covering over impacted pavement in the Transportation Corridor, as illustrated on **Figure 3**. Limited areas of soil with PCB concentrations greater than 1 mg/kg were left in place under site structures following 2015 soil removal activities. Orange demarcation fabric was placed (see **Figure 3**) prior to backfilling and restoring these areas.

During the various site investigations, a limited number of soil samples were collected beneath site structures, such as the concrete building slab, the AST containment, and the Transportation Corridor. In accordance with the 373 Permit, soil under these structures is to be investigated when it becomes accessible. Until such time, disturbance of the structures over these areas should be considered disturbance of a cover system and be performed in accordance with the EWP provided in **Appendix C**.

3.3.1 Fencing/Access Control

A gated and locked fence acts as an EC at the site to restrict access. The six-foot-high chain link security fence encompasses known areas of remaining impacts at the site. A portion of the northeast part of the site is outside the fenced area. The main access to the site is through an electronic gate on Milens Road. There are also three gates in the rail spur area for the two sets of railroad tracks and the gravel access road to the Lamar billboard. Padlocks are used to secure the three gates in the rail spur area.

3.3.2 Epoxy Coating

Based on sampling performed within the on-site building during the early 2000s, PCB impacts to the shop floor were identified that were not directly related to the PCB storage areas. After evaluating remedial options, GE elected to epoxy coat sections of the floor with PCB impacts to allow continued use in accordance with TSCA. The double wash, double rinse procedures followed by double epoxy coating of the floor in contrasting colors as outlined in TSCA for continued use of porous surfaces impacted by PCBs (40 CFR Part 761.30(p)) was performed during early 2004. These procedures were documented in the Closure Certification Report (URS 2006). **Figure 2** shows the epoxy-coated areas.

The epoxy coating is a durable cover system and it is anticipated that minimal repairs will be needed. The topcoat may require periodic repair/replacement due to wear. The lower coat is unlikely to be penetrated except in the event of a planned activity, such as changes in shop operations. Procedures for routine repairs or disruption are described in the Work Plan for Cover Repairs provided in **Appendix D**. In the event that this cover system is breached or removed, the procedures described in **Appendix D** will be followed, or a task-specific plan will be prepared and submitted to NYSDEC for review and approval.

prior to commencement of on-site activities. Procedures for the inspection of the epoxy coating are provided in the Monitoring Plan included in Section 4.0 of this ISMP.

3.3.3 Asphalt Pavement

The Transportation Corridor is part of a larger paved area that extends from the south wall of the building south to the fence line. This area meets the TSCA definition of a low-occupancy area because it is used only for parking and equipment storage. Remediation (removal of the top layer of impacted asphalt) was performed in the area during 2004, and post-removal samples indicated PCBs were present in the remaining asphalt. Post-removal samples indicated that concentrations in some areas were greater than 1 mg/kg, but that the area met the cleanup objective (25 mg/kg) for a low-occupancy area in accordance with 40 CFR Part 761.61(a)(4)(i)(B). This work was documented in the Closure Certification Report (URS 2006). Portions of the Transportation Corridor that were inaccessible in 2004 due to equipment storage were investigated in 2014, and CMs for the portion of that area that exhibited PCB concentrations greater than 1 mg/kg were performed in 2015. The 2015 work included removal of the top inch of pavement and installation of a new layer of asphalt. This work was documented in the CMCFR (AECOM 2016).

Portions of the Transportation Corridor where PCBs remain at concentrations greater than 1 mg/kg have been covered with a layer of asphalt to minimize the potential for direct contact with impacted asphalt and the potential for migration of impacted materials as the asphalt deteriorates with time. Procedures for the inspection of this asphalt cover are provided in the Monitoring Plan included in Section 4.0 of this ISMP.

The asphalt cover is expected to need repair or replacement periodically, and procedures for routine repairs or disruption are described in the Work Plan for Cover Repairs provided in **Appendix D**. These procedures will be followed, along with potentially applicable portions of the EWP in **Appendix C**, or a task-specific plan will be prepared and submitted to NYSDEC for review and approval prior to beginning work.

3.3.4 Criteria for Completion

Inspection and as-needed maintenance and repair of cover systems are anticipated to continue until extinguishment of the Environmental Easement. In accordance with the 373 Permit, a schedule for preparation of a RCRA Facility Investigation Work Plan for the inaccessible sub-slab soils will be prepared within 90 days of when operations cease or are altered in a manner that would allow access for investigation of such areas.

4.0 MONITORING PLAN

4.1 General

This Monitoring Plan describes the measures for evaluating the overall performance and effectiveness of the ECs and ICs at the site. This plan may be revised only with the approval of NYSDEC.

In accordance with the 373 Permit, groundwater at the site will be monitored for five years to verify the findings of the 1998-1999 RFI, which found that groundwater had not been impacted by historical site activities. A Groundwater Monitoring Plan has been prepared and is included as **Appendix E** of this ISMP.

This Monitoring Plan also describes the methods to be used for evaluating site information periodically to confirm that the remedy continues to be effective in protecting public health and the environment. To adequately address this, the Monitoring Plan provides information on annual inspection and periodic certification. Reporting requirements are provided in Section 7.0 of this ISMP.

4.2 Site-Wide Inspection

Site-wide inspections will be performed annually. Modification to the frequency of inspections will require approval from NYSDEC. Site-wide inspections will also be performed after severe weather conditions that may affect ECs. During these inspections, an inspection form (**Appendix F**) will be completed. The form will compile sufficient information to assess the following:

- Compliance with all ICs, including site usage
- The condition and continued effectiveness of ECs
- General site conditions at the time of the inspection
- Confirmation that site records are up to date

Remedial components installed at the site will be inspected. A comprehensive site-wide inspection will be conducted and documented according to the ISMP schedule, regardless of the frequency of the Periodic Review Report (PRR). The inspections will determine and document the following:

- Whether ECs continue to perform as intended
- If controls continue to be protective of human health and the environment
- Compliance with requirements of this ISMP and the Environmental Easement
- Whether site records are complete and up to date

Inspections will also be performed in the event of an emergency. If an emergency, such as a natural disaster or an unforeseen failure of any of the ECs occurs that reduces or has the potential to reduce the effectiveness of ECs in place at the site, verbal notice to NYSDEC must be provided by noon of the following day. In addition, the site will be inspected within five days of the event by a qualified environmental professional, as

determined by NYSDEC, to verify the effectiveness of the ICs/ECs implemented at the site. Written confirmation must be provided to NYSDEC within seven days of the event that includes a summary of actions taken, or to be taken, and the potential impact to the environment and the public.

4.3 Engineering Control System Assessment

Performance of on-site ECs will be evaluated based on visual inspection. Repairs will be completed as required by inspection results and will be performed in accordance with the Work Plan for Cover Repairs in **Appendix D**, and if applicable, the EWP in **Appendix C**.

Should significant repairs be required to the ECs discussed below, a Corrective Action Plan will be prepared and submitted to NYSDEC for review and approval prior to commencement of on-site activities.

5.3.1 Fencing/Access Control System

The fencing and gates will be inspected annually. Breaks in the fence or gates will be repaired as soon as practicable.

5.3.2 Epoxy Coating

The epoxy floor coating in the on-site building will be inspected annually. The inspector will look for blistering, bubbling, craters, poor adhesion and peeling, lack of uniformity, tacky or soft patches, lumps/bumps/globs, complete damage and disintegration, and general wear.

The assessment will include recommendations for repairs or maintenance of the coating, if appropriate. As long as the base layer of epoxy is intact, the coating will be considered an effective barrier and protective of human health and the environment, and recommended repair work will be considered nonessential.

Routine repairs of the epoxy coating on the building floor would be conducted when the building is to be used for long-term continual occupancy. In such cases, maintenance activities of the coating may include replacement of the top coat when it shows wear down to the second layer; replacement of epoxy if there are dings, chips, or gouges; or coating of an area that was previously inaccessible due to the presence of equipment. Repairs should be performed under the oversight of a qualified environmental professional, or their designee. Nonessential repairs will be performed when practicable.

When the building is under continual occupancy and in the event that a piece of equipment is removed leaving uncoated concrete exposed, barriers will be placed around the area to restrict access until the area can be either sampled to demonstrate compliance with the site cleanup objectives, or double washed and epoxy coated to comply with TSCA's provisions for continued use of PCB-impacted porous surfaces.

5.3.3 Asphalt Pavement

The asphalt pavement of the Transportation Corridor will be inspected annually. The inspector will look for cracks, heaving, shrinkage, potholes, depressions, rutting, disintegration, or other damage.

The assessment will include recommendations for repairs or maintenance of the asphalt top coat, if appropriate. If the area continues to be used for parking and equipment storage, which meets the criteria for a low-occupancy area, repairs to the top coat that may be recommended will be considered nonessential. If damage to, or deterioration of, the underlying PCB-impacted asphalt is visible at the time of the inspection, the repairs will be considered essential and the area will be barricaded to prevent further damage. Essential repairs will be undertaken as soon as possible.

Repairs might include cold patching or hot patching small areas of damage, seal coating of the pavement, or crack sealing.

5.0 OPERATION AND MAINTENANCE PLAN

The site remedy does not rely on any mechanical systems, such as groundwater treatment systems, sub-slab depressurization systems, or air sparge/soil vapor extraction systems, to protect public health and the environment. Therefore, the operation and maintenance of such components is not included in this ISMP.

6.0 PERIODIC ASSESSMENTS/EVALUATIONS

Periodic assessment of climate change vulnerability and evaluation of green remediation are not anticipated.

A formal climate change vulnerability assessment has not been performed for the site. The site is not located in a floodplain. Much of the site is covered by impervious surfaces such as pavement and structures. Native site soils are tight silts and clays. The soils are fairly impervious and standing water is commonly observed following rain events in northern portions of the site. Most of the drainage from impervious areas is toward catch basins at and near the site that drain to the Town of Tonawanda storm sewer system beneath Milens Road. The separate storm sewer system discharges into Two Mile Creek. The system appears to have sufficient capacity to handle storm events under current climatological conditions. No areas of erosion were observed prior to the 2015 implementation of CMs.

Restoration of the vegetative cover has been completed. The remedy does not include remedial systems and the site does not have many trees, so vulnerability from high winds is limited. The remedy does not include remedial systems; therefore, power outages or surges and dips will not affect the remedy. Residually impacted materials at the site are under cover systems that limit the possibility of exposure.

7.0 REPORTING REQUIREMENTS

7.1 Site Management Reports

Site management inspection and maintenance events will be recorded on the appropriate site inspection forms, which are provided in **Appendix F**. Data generated from the groundwater monitoring program will be reported separately in accordance with the NYSDEC-approved Groundwater Monitoring Plan.

Applicable inspection forms and other records, including media sampling data, generated for the site during the reporting period will be provided in electronic format to NYSDEC (in accordance with the requirements of **Table 2**) and summarized in the PRR.

Table 2: Schedule of Interim Monitoring/Inspection Reports

Task/Report	Reporting Frequency*
Inspection Report	Annually
Periodic Review Report	Every three years or as otherwise determined by NYSDEC

* Events will be conducted at the frequency specified until otherwise approved by NYSDEC.

Interim monitoring/inspection reports will include:

- Date of event or reporting period
- Name, company, and position of person(s) conducting inspection activities
- Description of the activities performed
- Where appropriate, color photographs or sketches showing the approximate location of problems or incidents noted (included either on the checklist/form or on an attached sheet)
- Type of samples collected, if any; and
- Copies of all field forms, completed observations, conclusions, or recommendations

The inspection report will also include a summary of routine repairs to the cover systems that were undertaken since the last report. The report will include analytical results for samples collected, such as those collected for waste characterization purposes. A summary description of the waste generated during the work and documentation of disposal will also be included.

7.2 Periodic Review Report

A PRR will be submitted to NYSDEC beginning 16 months after approval of this ISMP. After submittal of the initial PRR, subsequent reports will be submitted to NYSDEC every three years or at another frequency as may be required by the Department. In the event that the site is subdivided into separate parcels with different ownership, a single PRR will be prepared that addresses the site as described in the Environmental Easement

in **Appendix A**. The report will be submitted within 60 days of the end of each certification period. The report will include:

- Identification, assessment and certification of all ICs/ECs required by the remedy for the site
- Results of the required annual site inspections and severe condition inspections, if applicable
- Applicable site management forms and other records generated for the site during the reporting period in the NYSDEC-approved electronic format, if not previously submitted
- A site evaluation, which includes the following:
 - The compliance of the remedy with the requirements of the Statement of Basis
 - The effectiveness of the ICs and ECs, including identification of needed repairs or modifications
 - Any new conclusions or observations regarding site conditions based on inspections or other site management programs (Groundwater Monitoring Plan)
 - Recommendations regarding any necessary changes to the monitoring program
 - An opinion as to whether the remedy continues to be effective in achieving remedial goals as specified by the Statement of Basis
 - The overall performance and effectiveness of the remedy

7.2.1 Certification of Institutional and Engineering Controls

Each PRR will include certifications in accordance with NYSDEC DER-10.

7.3 Corrective Measures Work Plan

If any component of the remedy is found to have failed, or if the periodic certification cannot be provided due to the failure of an IC or EC, a Corrective Measures Work Plan will be submitted to NYSDEC for approval. This plan will explain the failure and provide the details and schedule for performing work necessary to correct the failure. Unless an emergency condition exists, no work will be performed pursuant to the Corrective Measures Work Plan until it has been approved by NYSDEC.

8.0 REFERENCES

- AECOM. 2010. Technical Services Northeast, Inc. Additional Bank Soil Sampling Along Two Mile Creek, GE Parts and Repair Service Center, Tonawanda, New York. September 30.
- AECOM. 2015a. Corrective Measures Implementation Design Report, GE Parts and Repair Service Center, Tonawanda, New York. January.
- AECOM. 2015b. Additional Pre-Design Investigation Data, GE Parts and Repair Service Center, Tonawanda, New York. February.
- AECOM. 2016. Corrective Measure Completion Final Report, GE Parts and Repair Service Center, Tonawanda, New York. June.
- Dames & Moore. 1999a. RFI Report, GE Apparatus Service Center, Tonawanda, New York, April 2.
- Dames & Moore. 1999b. Corrective Measure Study (CMS) Plan, GE Apparatus Service Shop, Tonawanda, New York. December.
- Dames & Moore. 2000a. Corrective Measures Study Final Report, GE Apparatus Service Shop, Tonawanda, New York. April.
- Dames & Moore. 2000b. Supplemental Sewer Investigation Report, GE Apparatus Service Center, Tonawanda, New York. April 14.
- New York State. 2006. 6 NYCRR Part 375, Environmental Remediation Programs. December 14.
- New York State Department of Environmental Conservation (NYSDEC). 1994. Technical and Administrative Guidance Memorandum (TAGM) #4046, Determination of Recommended Soil Cleanup Objectives and Cleanup Levels. January.
- NYSDEC. 1996. Part 373 Hazardous Waste Operating Permit, General Electric International, Inc., Facility DEC ID 9-1464-00044. May.
- NYSDEC. 2010. DER-10 – Technical Guidance for Site Investigation and Remediation. August.
- NYSDEC. 2011. Statement of Basis for GE Buffalo Service Shop, Tonawanda, Erie County, New York. October.
- NYSDEC. 2012. Part 373 Hazardous Waste Operating Permit Renewal, General Electric International, Inc., Facility DEC ID 9-1464-00044. July.
- URS Corporation (URS). 2000. Revised Closure Plan, GE Apparatus Service Shop, Tonawanda, New York. June.
- URS. 2001a. Summary of Soil Sampling Results Supplemental Investigation, GE Apparatus Service Shop Tonawanda, New York. April.

- URS. 2001b. Off-Site Storm Sewer Investigation Report, GE Apparatus Service Shop, Tonawanda, New York. July.
- URS. 2002. RCRA Closure Certification Report, GE Tonawanda Inspection and Repair Service Center, Tonawanda, New York. September.
- URS. 2003. Two Mile Creek Limited Sediment Investigation Sampling Report, General Electric International, GE Inspection and Repair Service Center, Tonawanda, New York. March.
- URS. 2006. Closure Certification Report – Commercial PCB Storage Area, Inspection and Repair Service Center, Tonawanda, New York. April.
- URS. 2011. Focused CMS, GE Parts and Repair Service Center, Tonawanda, New York. July.
- URS. 2012. Corrective Measure Implementation Plan, Parts and Repair Service Center, Tonawanda, New York. October 2.
- URS. 2014a. Pre-Design Investigation Work Plan for the Concrete Ramp and Transportation Corridor, GE Parts and Repair Service Center, Tonawanda, New York. January.
- URS. 2014b. Pre-Design Soil Investigation Work Plan, GE Parts and Repair Service Center, Tonawanda, New York. February.
- URS. 2014c. Work Plan for Additional Pre-Design Investigation, GE Parts and Repair Service Center, Tonawanda, New York. July.
- URS. 2014d. Pre-Design Investigation Data, GE Parts and Repair Service Center, Tonawanda, New York. September 17.
- URS. 2014e. Two Mile Creek Limited Bank Soil Removal Work Plan, GE Parts and Repair Service Center, Tonawanda, New York. September.
- URS. 2014f. Proposed Supplemental Sampling for Additional Pre-Design Investigation, GE Parts and Repair Service Center, Tonawanda, New York. October.
- URS. 2014g. Work Plan for Stepwise Investigation, GE Parts and Repair Service Center, Tonawanda, New York. November.

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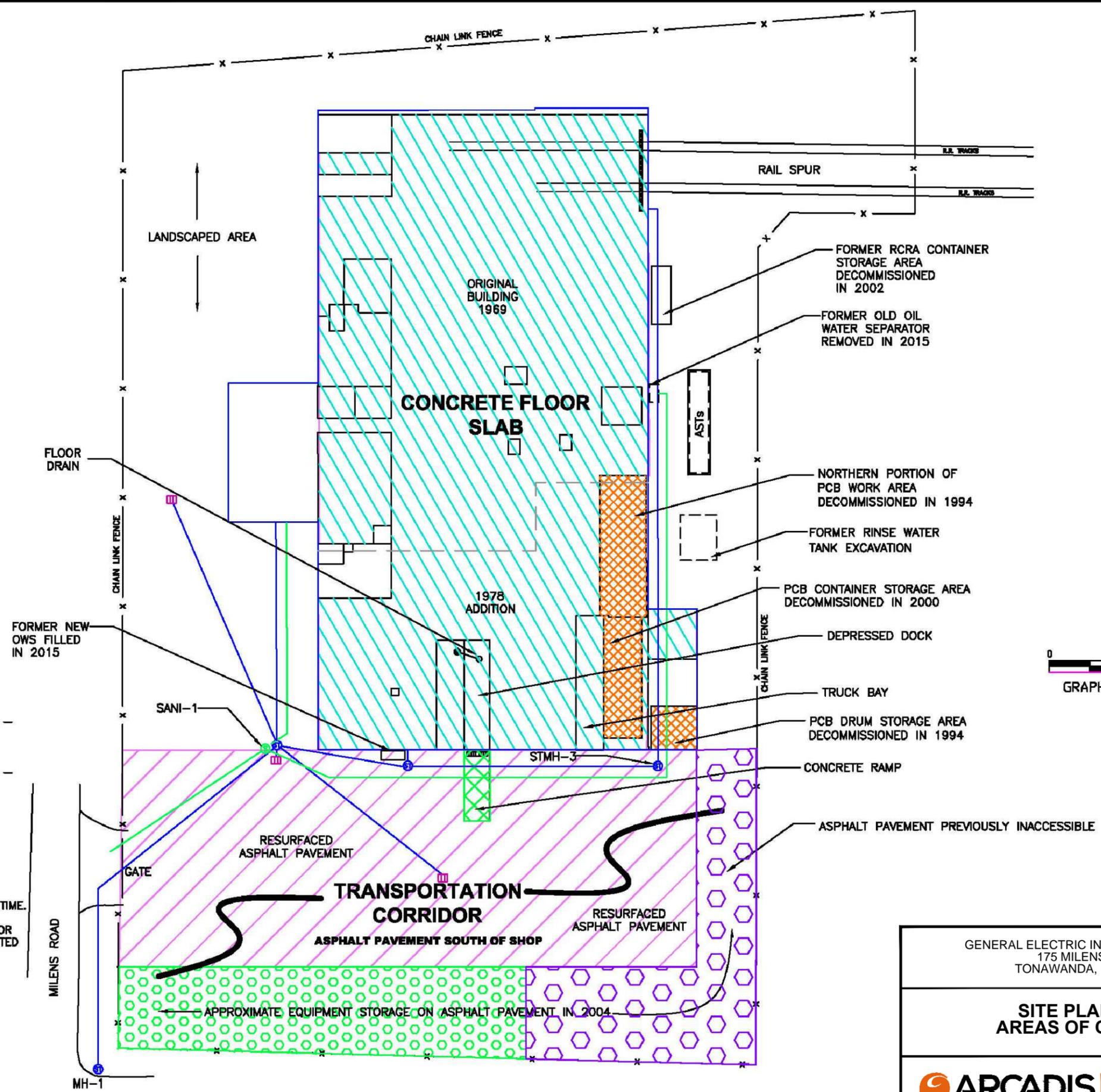
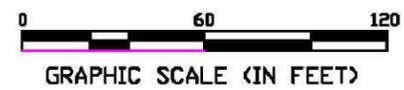
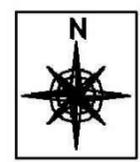
LEGEND

-  - DECOMMISSIONED PCB AREA
-  - TRENCH DRAIN
-  - STORM MANHOLE
-  - SANITARY MANHOLE
-  - CATCH BASIN
-  - STORM SEWER
-  - SANITARY SEWER

-  - CLEANED AND EPOXY COATED CONCRETE SURFACES (2003-2004)
-  - ASPHALT PAVEMENT - SURFACE REMOVED AND REPLACED (2004)
-  - CONCRETE RAMP EVALUATED IN 2014 - NOT IMPACTED
-  - ASPHALT PAVEMENT PREVIOUSLY INACCESSIBLE - EVALUATED IN 2014 - NOT IMPACTED
-  - ASPHALT PAVEMENT PREVIOUSLY INACCESSIBLE - SURFACE REMOVED AND REPLACED (2015)

NOTES:

1. THE LOCATIONS OF SITE FEATURES ARE APPROXIMATE.
 2. IN DECEMBER 2004, THE TOP INCH OF ASPHALT PAVEMENT IN THE TRANSPORTATION CORRIDOR WAS REMOVED, DISPOSED OF OFF-SITE, AND REPLACED WITH NEW ASPHALT. THE ASPHALT BENEATH THE EQUIPMENT STORAGE WAS NOT ACCESSIBLE AND THEREFORE NOT REPLACED AT THAT TIME.
 3. BETWEEN DECEMBER 2003 AND MAY 2004 THE FACILITY CONCRETE FLOOR WAS SUBJECTED TO A DOUBLE WASH AND DOUBLE RINSE AND EPOXY COATED WITH CONTRASTING COLORS AND LABELING.
- SOURCES FOR THIS FIGURE WERE:**
- A. "MAP OF GENERAL ELECTRIC SERVICE CENTER PROPERTY, PART OF LOT 45, TOWNSHIP 12, RANGE 8, TOWN OF TONAWANDA, ERIE COUNTY, NEW YORK" KRIEBEL ASSOCIATES, JULY 29, 1998.
 - B. "1/8" PART FLOOR PLAN AND DETAILS," CANNON DESIGN INC., AS-BUILT 4-19-78.



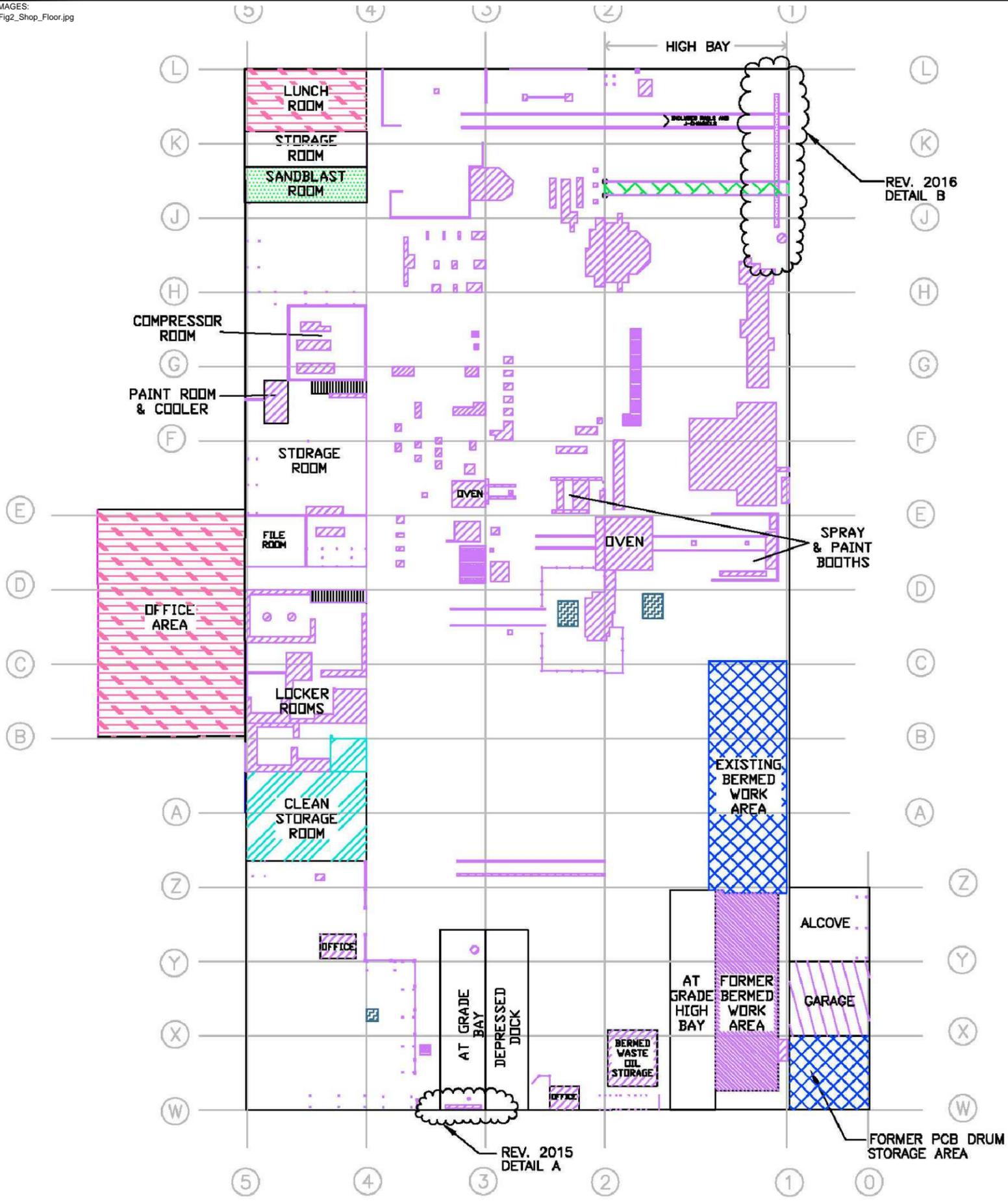
GENERAL ELECTRIC INTERNATIONAL, INC.
 175 MILENS ROAD
 TONAWANDA, NEW YORK

**SITE PLAN WITH
 AREAS OF CONCERN**

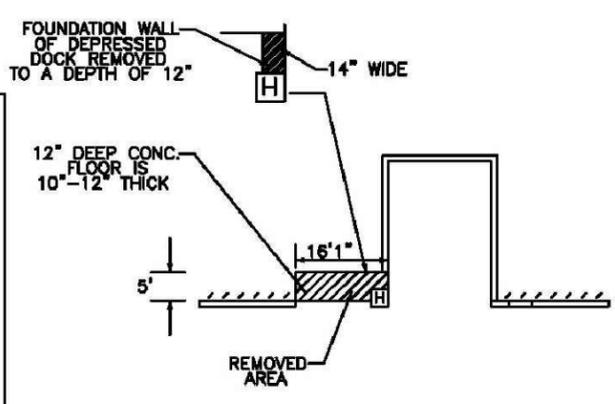

Design & Consultancy
for natural and built assets

FIGURE
1

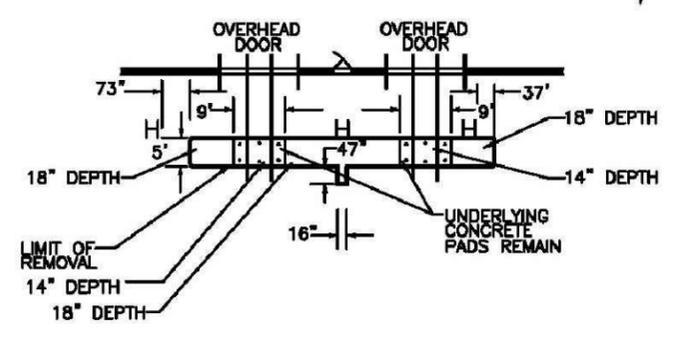
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DETAIL A
 2015 TRENCH DRAIN REMOVAL
 (NOT TO SCALE)



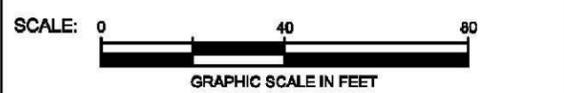
DETAIL B
 TRENCH DRAIN REHABILITATION
 (NOT TO SCALE)



LEGEND

- Coating Completed
- Equipment/Office Removed, Coating Completed
- Drain Area Repaired, Coating Reapplied
- Inaccessible Areas, Coating Not Required
- Non-Contiguous Area, Coating Not Required
- Non-Manufacturing Areas
- Area Previously Clean Closed in 1994, Coating Not Required
- Area Documented Clean, Coating Not Required
- Cleaned Grounding Plate, Coating Not Required
- PCB-Contaminated, Asbestos-Containing Tile Removed, Coating Not Required
- Epoxy Top Coat Completed Over Existing Clean Base Coat for Aesthetics
- Heaved Concrete Replaced

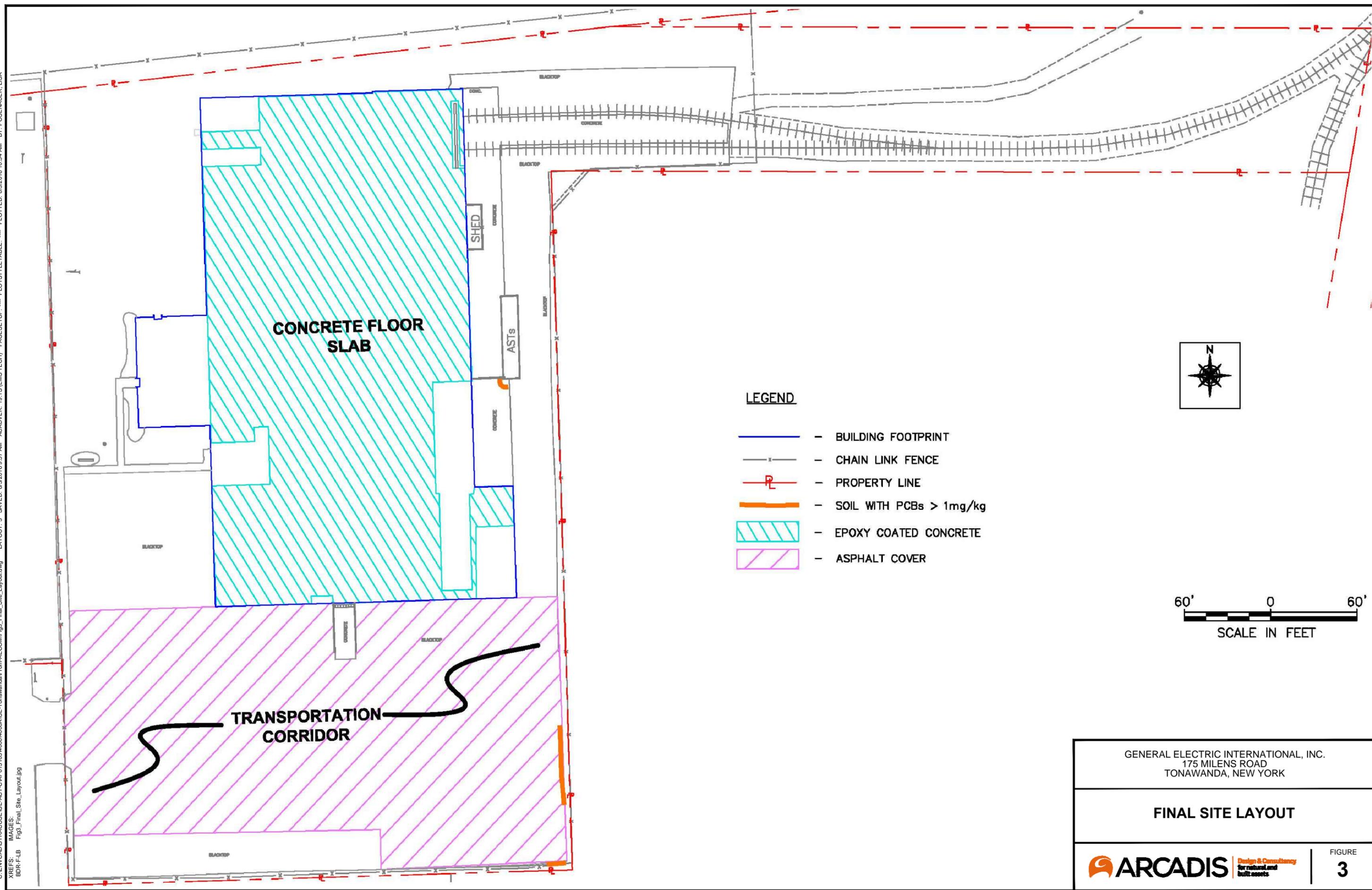
- NOTES:**
- Inaccessible areas are based on measurements taken during epoxy coating activities (December 2003 through June 2004).
 - The walls of the depressed dock were also coated with epoxy.
 - Interior of main shop area is 180 feet by 350 feet.
 - Epoxy coating shown reflects 2004 conditions except as noted revised in 2015 to 2016.
- SOURCES:**
- "Map of General Electric Service Center Property, Part of Lot 45, Township 12, Range 6, Town of Tonawanda, Erie County, New York" Kriebel Associates, July 29, 1998.
 - "1/16 Floor Plan and Mezzanine Floor Plan" Cannon Design, Inc., April 19, 1978.
 - "1/8 Part Floor Plan and Details" Cannon Design, Inc., April 19, 1978.



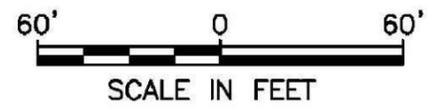
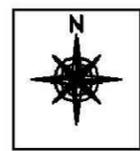
GENERAL ELECTRIC INTERNATIONAL, INC.
 175 MILENS ROAD
 TONAWANDA, NEW YORK

**EPOXY COATED AREAS
 AS OF JUNE 2004**

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- LEGEND**
-  - BUILDING FOOTPRINT
 -  - CHAIN LINK FENCE
 -  - PROPERTY LINE
 -  - SOIL WITH PCBs > 1mg/kg
 -  - EPOXY COATED CONCRETE
 -  - ASPHALT COVER



GENERAL ELECTRIC INTERNATIONAL, INC.
 175 MILENS ROAD
 TONAWANDA, NEW YORK

FINAL SITE LAYOUT

 **ARCADIS** Design & Consultancy for natural and built assets

FIGURE **3**

APPENDIX A – ENVIRONMENTAL EASEMENT

[Note: The environmental easement for this site is being prepared in parallel with this Interim Site Management Plan, and, once finalized, will be incorporated herein as Appendix A.]

APPENDIX B
LIST OF SITE CONTACTS

Name	Phone/Email Address
Ron Riggs GE Facility EHS Contact	716 912-6901 ronald.riggs@ge.com
Lewis Streeter GE Project Manager	518 862-2712 lewis.streeter@ge.com
Doug Weeks Arcadis Project Manager	518 250-7378 doug.weeks@arcadis.com
James P. Nuss, P.E. Arcadis - Qualified Environmental Professional	315.243.8967 james.nuss@arcadis.com
Jessica LaClair, NYSDEC Project Manager	518 402-9821 jess.laclair@dec.ny.gov
Kathleen Emery NYSDEC Regional Hazardous Waste Engineer	716 851-7220 kathleen.emery@dec.ny.gov
Roger Florio Remedial Party Attorney	610 992-7969 roger.florio@ge.com

APPENDIX C

EXCAVATION WORK PLAN

This Excavation Work Plan (EWP) outlines the standard procedures that will be followed to excavate and manage soils in areas of the site where known impacts remain or where soil quality has not been fully evaluated. All work performed under this plan will also be performed under a site-specific health and safety plan (HASP) to be prepared prior to the start of work.

Surface and subsurface soil on the GE property was remediated in 2015 to achieve 1 mg/kg or less PCBs in soil, except for three areas where additional soil could not be removed without impacting an overlying Site structure. These three areas are:

- Southwest corner of the ASTs: Subsurface soil in the area contained 1.2 mg/kg PCBs. Additional soil could not be removed due to the proximity of the ASTs. Orange geotextile fabric and 12 or more inches of soil and concrete were placed over these soils.
- East Edge of the Transportation Corridor: Soil in the area contained up to 12.5 mg/kg PCBs. Additional soil could not be removed without removing asphalt pavement. Geotextile fabric demarcates soil remaining under the pavement with PCBs greater than 1 mg/kg from clean fill placed in remediated areas to the east extending approximately 55 feet.
- South Edge of the Transportation Corridor: Soil in the area contained 2.9 mg/kg PCBs. Additional soil could not be removed without removing the asphalt pavement. Geotextile fabric demarcates soil remaining under the pavement with PCBs greater than 1 mg/kg from clean fill placed in remediated areas to the south extending approximately 17 feet.

In addition to the residual impacted PCB soils remaining after the 2015 Corrective Measure work, PCB impacted concrete and asphalt remain in use at the site in accordance with the selected remedy and design. These areas include:

- Concrete Floor Slab (Depressed Dock and Truck Bay): The depressed dock and truck bay along with most of the concrete shop floor slab with PCBs greater than 1 mg/kg or 10 μ /100 cm². These areas are covered with an epoxy coating to prevent direct contact with impacted materials and to allow continued use of the concrete slab.
- Asphalt of Transportation Corridor: An irregularly shaped area of asphalt with PCBs greater than 1 mg/kg comprising most of the paved area south of the shop. The PCB-impacted asphalt is covered by a topcoat of asphalt.

In addition, soil beneath site structures, such as the building floor slab, the AST containment structure, and the transportation corridor, has not been fully evaluated and may be impacted by PCBs. Soil in these areas should be conservatively managed as PCB-impacted until such time that a sampling program demonstrates the soil has not been impacted by PCBs.

C-1 NOTIFICATION

At least 15 days prior to the start of planned activity that is anticipated to encounter residually impacted PCB soils or potentially impacted soils, the site owner or their representative will notify the NYSDEC. Notification will be made to the NYSDEC Project Manager and the Regional Hazardous Waste Engineer listed in Appendix B.

This notification will include:

- A description of the work to be performed, including the location and areal extent of excavation, intrusive elements or utilities to be installed below grade (if applicable), estimated volumes of contaminated soil to be excavated, and a description of how the work impacts engineering controls (if applicable);
- A summary of environmental conditions anticipated to be encountered in the work areas, including the nature and concentrations of PCBs, and plans for pre-construction sampling, if any;
- A schedule for the work, detailing the start and completion of intrusive work;
- A summary of the applicable components of this EWP;
- A statement that the work will be performed in compliance with this EWP and 29 CFR 1910.120;
- A copy of the contractor's HASP;
- Identification of disposal facilities for potential waste streams; and
- Identification of sources of anticipated backfill, along with required chemical testing results.

In the event that procedures other than the standard protocols described herein are proposed, the proposed alternate excavation approach will be described in the notification.

C-2 MATERIAL SCREENING METHODS

Visual and instrument-based (e.g. photoionization detector) screening will be performed by a qualified environmental professional or a person under their direction during excavations into known or potentially impacted soil or other materials. Screening will be performed when intrusive work is performed in areas of known or suspected residual impacts, including excavation and intrusive work performed for foundations and utility work, as well as cover system repairs, in accordance with this ISMP.

Soils and other removed materials will be segregated based on previous environmental data and screening results into material that requires off-site disposal and material that requires testing to determine if the material can be reused on-site as soil beneath a cover or if the material can be used as cover soil. Further discussion of off-site disposal of materials and on-site reuse is provided in Section C-7 of this Appendix.

C-3 MATERIAL STAGING METHODS

Removed soil, asphalt, concrete or other debris may be stored in drums, lined and covered roll-off containers, or in soil stockpiles at the site until removed for disposal or reused as backfill. If materials are stockpiled, separate piles will be created as necessary based on screening results.

Stockpiles will be placed on two layers of polyethylene sheeting, and will be encircled with a berm and/or silt fence. Hay bales will be used as needed near catch basins.

Stockpiles will be kept covered when they are not in use and damaged covers will be promptly replaced. Stockpiles will be inspected at a minimum once each week and after severe storm events. Results of inspections will be recorded in a logbook.

C-4 MATERIAL EXCAVATION, MANAGEMENT, AND LOADOUT

A qualified environmental professional or person under their supervision will oversee intrusive work and the excavation and load-out of excavated material.

The owner of the property and its contractors are responsible for safe execution of intrusive and other work performed under the ISMP.

The presence of utilities and easements on the site will be investigated by the qualified environmental professional. The focus of the investigation will be to assess whether a risk or impediment to the planned work under this ISMP is posed by utilities or easements on the site.

Soils at the site are anticipated to contain no contaminants of concern other than PCBs. Asphalt at the site is anticipated to contain no contaminants of concern other than PCBs. Concrete in the area of the two spray booths has the potential to contain VOCs or metals and will require segregation and testing to confirm that concentrations of these compounds are not present at levels that would require management and disposal as a RCRA characteristic hazardous waste. For the remainder of the concrete floor slab, the contaminant of concern is limited to PCBs. Unless the screening procedures discussed in Section C-2 indicate unanticipated conditions may exist that warrant further evaluation, the material will be managed and disposed of based on as-found PCB concentrations.

The site owner may elect to dispose or reuse soil in accordance with the established site cleanup objectives and provisions set forth in the Statement of Basis and the 373 Permit, or may voluntarily elect to be more conservative in soil management. This plan includes provisions for managing soils based on the five categories of as-found PCB concentrations that are described below.

1. Soils known or assumed to contain PCBs at concentrations equal to or greater than 50 milligrams per kilograms (mg/kg). Removed soils will be managed and disposed as New York State hazardous wastes.
2. Soils known to contain PCBs at concentrations at or greater than 10 mg/kg and less than 50 mg/kg will be managed and disposed as low concentration PCB waste.
3. Soils known to contain PCBs at concentrations at or greater than 1 mg/kg and less than 10 mg/kg can be reused under a cover system as long as the site use is restricted to industrial/commercial. Alternately, the site owner may elect to dispose of these soils as described in Item #2, above.
4. Soils known to contain PCBs at concentrations less than 1 mg/kg may be reused in compliance with Part 375 regulations for residential use. Alternately,

the site owner may elect to dispose of these soils as described in Item #2, above.

Vehicles transporting soil and other materials will be appropriately lined, tarped, securely covered, manifested, and placarded in accordance with appropriate Federal, State, local, and NYSDOT requirements (and other applicable transportation requirements).

Polyethylene sheeting or similar material will be placed on the ground at the load out area between the excavation or stockpile and truck or roll-off container. Polyethylene sheeting will be draped over the roll-off container or truck sides during loading. After loading and before tarping the Owner's contractor will inspect the tires, truck or roll off container sides, tailgate area, and the top of the truck bed rails or roll-off container for spilled soil or debris and will sweep, and if necessary wet clean, to remove spilled material. Material and liquids generated from wet cleaning will be captured and loaded out with the soil or other contaminated project debris, such as Personal Protective Equipment (PPE). The Owner's contractor will be responsible for ensuring that trucks have been adequately cleaned prior to leaving the work zone. Alternately, a truck wash will be operated on-site. If a truck wash is used, wash waters will be collected and disposed off-site in an appropriate manner. Locations where vehicles enter or exit the site will be inspected daily for evidence of off-site soil tracking.

The qualified environmental professional will be responsible for confirming that egress points for truck and equipment transport from the site are clean of dirt and other materials derived from the site during intrusive excavation activities. Cleaning of the adjacent streets will be performed as needed to maintain a clean condition with respect to site-derived materials.

C-5 MATERIALS TRANSPORTED OFF-SITE

Transport of materials will be performed by licensed haulers in accordance with appropriate local, State, and Federal regulations, including 6 NYCRR Part 364. Haulers will be appropriately licensed and trucks properly placarded.

Material transported by trucks exiting the site will be secured with tight-fitting covers. Loose-fitting canvas-type truck covers will be prohibited. If loads contain wet material capable of producing free liquid, truck liners will be used.

C-6 MATERIALS DISPOSED OFF-SITE

Soil, fill, concrete, asphalt, and similar materials excavated and removed from portions of the site with known or suspected residual PCB impacts will be treated as PCB containing unless the materials are documented, by sampling and analysis, to be non-regulated. Impacted materials will be transported and disposed in accordance with local, State (including 6NYCRR Part 360) and Federal regulations.

Off-site disposal locations for excavated soils will be identified in the pre-excavation notification. This will include estimated quantities and a breakdown by class of disposal facility if appropriate, i.e. hazardous waste disposal facility, solid waste landfill, petroleum treatment facility, C/D recycling facility, etc. Actual disposal quantities and associated documentation will be reported to the NYSDEC in the Periodic Review Report. This documentation will include: waste profiles, test results, facility acceptance letters, manifests, bills of lading and facility receipts.

Non-hazardous historic fill and contaminated soils taken off-site will be handled, at minimum, as a Municipal Solid Waste per 6NYCRR Part 360-1.2. Material that does not meet Unrestricted SCOs is prohibited from being taken to a New York State recycling facility (6NYCRR Part 360-16 Registration Facility).

C-7 MATERIALS REUSED ON-SITE

The qualified environmental professional will verify that procedures defined for materials reuse in this ISMP are followed and that unacceptable material does not remain on-site. Impacted on-site material, including historic fill and contaminated soil, that is acceptable for reuse on-site will be placed below a demarcation layer or impervious surface, and will not be reused within a cover soil layer, within landscaping berms, or as backfill for subsurface utility lines.

Determination of materials suitable for reuse on-site will be based on results from previous investigations and/or project-specific sampling and will be based on the soil management categories outlined in section C-4. If field screening observation indicated unanticipated conditions have been encountered, the soil will be segregated and sampled as appropriate to confirm that it is suitable for reuse. Planned project-specific sampling details will be provided in the notification.

C-8 FLUIDS MANAGEMENT

Liquids to be removed from the site, including but not limited to, floor wash waters, excavation dewatering and decontamination waters, will be handled, transported and disposed in accordance with applicable local, State, and Federal regulations. Dewatering fluids will not be recharged back to the land surface or subsurface of the site, and will be managed off-site, unless prior approval is obtained from NYSDEC.

Discharge of water generated during large-scale construction activities to the sanitary sewer would be performed under a permit from the Town of Tonawanda. Discharge to surface water is not anticipated to be a viable option, but would be performed under a SPDES permit.

C-9 COVER SYSTEM RESTORATION

After the completion of intrusive activities the cover system will be restored in a manner that complies with the Statement of Basis and Part 373 Permit, and is consistent with site use. The existing cover system described at the beginning of this EWP will be restored, as appropriate depending on site use. As discussed in Appendix D below, if asphalt or concrete in the project area is replaced with new materials, neither an asphalt cover nor an epoxy coating will be required. For areas with known residual soil impacts, a layer of demarcation fabric will be installed unless a confirmatory sampling program proposed in the notification demonstrates that site remedial objectives have been met and that the demarcation layer is not needed.

If the type of cover system changes from that which exists prior to the excavation (i.e., a soil cover is replaced by asphalt or concrete is replaced by lawn), this will constitute a modification of the cover element of the remedy. A figure showing the modified surface will be included in the subsequent Periodic Review Report and in an updated ISMP.

C-10 BACKFILL FROM OFF-SITE SOURCES

Imported soils will meet the backfill and cover soil quality standards established in 6 NYCRR 375-6.7(d). In the event crushed stone is being used that has insufficient fines for chemical analysis, a letter documenting that the source is virgin will be required. Soils that meet 'exempt' fill requirements under 6 NYCRR Part 360, but do not meet backfill or cover soil objectives for this site, will not be used.

Trucks entering the site with imported soils will be securely covered with tight fitting covers. Imported soils will be stockpiled separately from excavated materials and will be covered to prevent dust releases. Short-term storage of stone materials may be permitted without covers if no visible dust is generated.

C-11 STORMWATER POLLUTION PREVENTION

Appropriate stormwater pollution prevention control measures will be implemented as-needed. For small projects of limited duration, controls will only be used if the project is in close proximity to a storm drain structure.

For large projects erosion control barriers will be installed, as appropriate. Erosion controls will be inspected once a week and after severe storm events. Results of inspections will be recorded in a logbook and maintained at the site and available for inspection by the NYSDEC. Necessary repairs will be made promptly. Accumulated sediments will be removed as required to keep the controls functional. Undercutting or erosion of the silt fence toe anchor shall be repaired with appropriate backfill materials. Manufacturer's recommendations will be followed for replacing silt fencing damaged due to weathering.

C-12 EXCAVATION CONTINGENCY PLAN

If underground tanks or other previously unidentified potential contaminant sources are found during post-remedial subsurface excavations or redevelopment related construction, excavation activities will be suspended until sufficient equipment is mobilized to evaluate and/or address the condition.

Sampling will be performed on product, sediment and surrounding soils, etc. as necessary to determine the nature of the material and proper disposal method. Chemical analysis will be performed for a full list of analytes (TAL metals; TCL volatiles and semi-volatiles, TCL pesticides and PCBs), unless the site history and previous sampling results provide a sufficient justification to limit the list of analytes. In this case, a reduced list of analytes will be proposed to the NYSDEC for approval prior to sampling.

Unknown or unexpected contaminated media identified by screening during intrusive site work will be promptly communicated by phone to NYSDEC's Project Manager. Reportable quantities of petroleum product will also be reported to the NYSDEC spills hotline. These findings will be also included in the Periodic Review Report.

C-13 COMMUNITY AIR MONITORING PLAN AND DUST CONTROL PLAN

For small projects, which are those less than approximately 20 cubic yards, community air monitoring will consist of visual assessment for dust generation by the qualified environmental professional or their designee. If visible dust is being generated, the Contractor will be required to halt work and implement dust suppression techniques

such as wetting the work area. For larger projects, a Community Air Monitoring Plan and Dust Control Plan will be prepared and submitted to NYSDEC with the notification.

For work inside the building, temporary barricades such as caution tape and plastic sheeting will be used to isolate a work area from areas of Owner operations. The temporary barricades will be installed prior to work that has the potential to generate dust. Isolation measures will also be employed to contain wash water if preparation includes cleaning the floor. The isolation measures employed will depend on the size of the work area.

APPENDIX D

COVER REPAIR WORK PLAN

This Cover Repair Work Plan (CRWP) outlines the procedures that will be followed to repair the epoxy coating installed over most of the shop floor (Figure 2 of the ISMP), and the asphalt cover installed in areas of the Transportation Corridor (Figure 3 of the Interim Site Management Plan [ISMP]). The need for cover repairs will be evaluated based on site use and building occupancy. The Excavation Work Plan at Appendix C (EWP) will also be followed as appropriate in instances where repairs to the cover systems may impact underlying soils. All work will be performed in accordance with a site-specific HASP.

Description of Epoxy Coating System

The majority of the main shop floor has been impacted with polychlorinated biphenyls (PCBs) from historical site activities. The procedures outlined in the Toxic Substance Control Act (TSCA) for continued use of porous surfaces impacted by PCBs (40CFR Part 761.30(p)) were used to address the impacts. Figure 2 of the ISMP shows the epoxy-coated areas. The initial coating activities were described in the April 1, 2006 *Closure Certification Report Commercial PCB Storage Area* that was prepared by URS Corporation (URS).

Typical repair and maintenance activities for the epoxy coating system, which may be either recommended or identified as necessary as a result of the annual cover system inspections, considering site use/occupancy, may include:

- Fresh application of top coat;
- Patching of both bottom and top coatings; and
- Installation/extension of coating system, if warranted, in the event previously inaccessible areas (ISMP Figure 2) become accessible (i.e., equipment is removed).

Changes in shop use may lead to removal of portions of the slab. Activities of this type will be performed in accordance with the ISMP. In the event that impacted concrete is completely removed in an area, coating of the replacement concrete would not be needed. Figure 2 of the ISMP will be updated in the event equipment is removed and the coating is extended, or if concrete is removed and an area no longer requires coating.

Description of Asphalt Cover

The paved area south of the shop building (the Transportation Corridor) has been impacted with PCBs at concentrations greater than one milligram per kilogram (mg/kg). Previous work at the site included removing the top inch of asphalt and installing an approximately 1.5-inch thick layer of new asphalt. The approximate extent of the asphalt overlay is shown in Figure 3 of the ISMP.

Typical repair and maintenance activities for the asphalt cover, which may be either recommended or identified as necessary as a result of the annual cover system inspections and site use, include:

- Milling and replacement of a portion of the topcoat; and
- Patching of the topcoat or full asphalt thickness when areas deteriorate.

Asphalt maintenance might include crack filling or sealcoating. These activities are not anticipated to result in disruption of the cover system and, therefore, are not covered.

Asphalt repairs could include complete removal of the asphalt in an area, which will be performed in accordance with the ISMP and EWP.

D-1 NOTIFICATION

At least 15 days prior to the start of planned activity that will disturb the epoxy or asphalt cover systems the site owner or their representative will notify the NYSDEC. Notification will be made to the NYSDEC Project Manager and the Regional Hazardous Waste Engineer listed in Appendix B.

This notification will include:

- A description of the work to be performed, including the general location and areal extent of disturbance, intrusive elements or utilities to be installed below grade (if applicable), estimated volumes of contaminated materials to be removed, and a description of how the work impacts the engineering control;
- A summary of environmental conditions anticipated to be encountered in the work areas, including the nature and concentrations of PCBs, and plans for pre-construction sampling, if any;
- A schedule for the work, detailing the anticipated start and completion of intrusive work;
- A summary of the applicable components of this CRWP;
- A statement that the work will be performed in compliance with this CRWP, the EWP (if applicable), and 29 CFR 1910.120;
- A copy of the contractor's HASP;
- Identification of disposal facilities for potential waste streams; and
- Identification of sources of anticipated backfill, along with required chemical testing results, if applicable.

In the event that procedures other than the standard protocols described herein are proposed, the proposed alternate approach will be described in the notification. All activities associated with screening, staging and removal of impacted materials will utilize Appendix C of the ISMP titled Excavation Work Plan.

D-2 COVER SYSTEM RESTORATION

Cover systems will be restored in a manner that complies with the Statement of Basis and 373 Permit, and is consistent with site use and occupancy. The existing cover systems described at the beginning of this CRWP will be restored, as appropriate.

Epoxy coatings will be replaced in-kind or with a similar compatible product. Preparation for resurfacing or patching will be in accordance with manufacturer's

recommendations. The use of contrasting colors will be maintained and documented. In the event equipment is removed and a previously inaccessible area becomes accessible, the Owner will either sample the area to evaluate if it needs to be coated, or will assume it is PCB-impacted and will follow the TSCA procedures for continued use of porous surfaces impacted by PCBs (40 CFR Part 761.30(p)).

Replacement of the asphalt cover will also be in-kind or with a similar product. Ideally, repairs will be performed in a manner that allows good contact between remaining asphalt and the new pavement, with methods dependent on the size of the area to be repaired. Temporary measures, such as hot patch or cold patch asphalt, may be used if a small area needs repair or if weather conditions (such as the onset of winter) limit the availability of pavement.

If asphalt or concrete in the project area is replaced with new materials, neither an asphalt cover nor an epoxy coating will be required. If the type of cover system changes from that which exists prior to the work (i.e., an area of impacted concrete or asphalt is completely removed and replaced with new materials, or equipment is removed and the epoxy coating is extended to a previously inaccessible area), this will constitute a modification of the cover element of the remedy and the upper surface of the remaining contamination. A figure showing the modified surface will be included in the subsequent Periodic Review Report and in an updated ISMP.

APPENDIX E – GROUNDWATER MONITORING PLAN

[Note: A Groundwater Monitoring Plan is being prepared to describe the protocols to be followed for post-remedy groundwater sampling to be conducted for five years. The document is being prepared in parallel with the ISMP, and, once finalized, will be incorporated into the ISMP as Appendix E]

APPENDIX F – SITE INSPECTION FORMS

Inspection Form
GE-Tonawanda, 175 Milens Road, Tonawanda, New York
NYSDEC Site Number: 915244

Inspection Performed by:

Name Title

Company Phone No. Address

Reason for Inspection (circle one): Annual Site Work Severe Weather Emergency

Describe site usage (circle one): Occupied Un-occupied

Describe Site Use:

Is site use compliant with Institutional Controls? Yes No

Describe General Site Conditions:

Site Records Up To Date: Yes No

Cover System Status

Asphalt Cover Area (Transportation Corridor [TC]): Is cover effective? Yes No

 Is cover intact? Yes No

 Does cover need maintenance? Yes No

Remaining Impacted Soil (AST area, east of TC, south of TC) Is cover effective? Yes No

 Is overlying structure present Yes No

 Is maintenance needed? Yes No

Interior Epoxy Coating: Is cover effective? Yes No

 Is upper coating intact? Yes No

 Is base coating intact? Yes No

 Does cover need maintenance? Yes No

Site Security: Is security effective? Yes No

 Fence and Gate Condition:

 Is fencing functional? Yes No

 Is maintenance needed? Yes No

Recommendations for maintenance:

Additional comments:

Corrective Measures necessary?

Residually impacted material remains undisturbed? Yes No

Engineering controls continue to protective of human health and the environment? Yes No

Site compliant with SMP and Deed Restriction? Yes No

Signature

Inspection Date

Attachments:

Additional Comments

Site Map with Notations

Photographs

Page ___ of ___

Inspection Form
GE-Tonawanda, 175 Milens Road, Tonawanda, New York
NYSDEC Site Number: 915244

Inspection Performed by: _____

Name

Title

Company

Phone No.

Address

Reason for Inspection:

Annual

Severe Weather

Emergency

Site Work

Attachments:

Additional Comments

Site Map with Notations

Photographs

Page ___ of ___

APPENDIX G – QUALITY ASSURANCE PROJECT PLAN

[Note: A Quality Assurance Project Plan (QAPP) was submitted and approved by NYSDEC in 2012 as part of the Corrective Measure Implementation Plan. The document will be updated and submitted to NYSDEC on an as needed basis, to account for potential future changes in media to be sampled, sampling protocols, etc.]

APPENDIX H – HEALTH AND SAFETY PLAN

[Note: A Health and Safety Plan (HASP) will be prepared prior to initiation of field work associated with the groundwater monitoring program. Upon request this document can be submitted to NYSDEC for their records, and, if needed, added to the SMP as an Appendix. The HASP will be reviewed and updated as needed to account for changes in the scope of field activities or other changes that may impact the work.]

APPENDIX I – COMMUNITY AIR MONITORING PLAN

[Note: A separate Community Air Monitoring Plan (CAMP) is not anticipated to be needed based on the current site activities. As such, Appendix C, Section C-13 outlines the protocols for air monitoring that should be followed for large and small projects that may be undertaken at the site.]