

**CRA**

Consulting Engineers

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DATE:

Oct 04 / 94

REFERENCE NO:

605-3

TO:

Bill WERTZ - NYSDOC

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Thanks,  
Dave M.

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OCT - 5 1994

DIRECTOR'S OFFICE  
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A Public Commitment 

October 4, 1994

Mr. Paul R. Counterman, P.E., Chief  
Bureau of Western Hazardous Waste Programs  
Division of Hazardous Substances Regulation  
New York State Department of  
Environmental Conservation  
50 Wolf Road  
Albany, New York 12233-0001

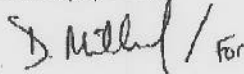
Re: Resource Conservation and Recovery Act (RCRA)  
Corrective Action Program  
NY Permit Number 90-86-0707  
Buffalo Avenue Plant  
• Soil Management Plan for Corrective Measures  
Implementation Activities Report, September 1994 - Addendum

Dear Mr. Counterman:

Please insert the enclosed addendum pages into the above referenced report. These changes have been made to clarify the Plant areas affected by the Soil Management Plan activities.

If you have any questions regarding this submission, please do not hesitate to call me at 716-286-3607.

Sincerely yours,

 / For

Alan F. Weston, Ph.D.  
Manager, Analytical Services  
Special Environmental Programs

APW/csm/2  
Encl.

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**Occidental Chemical Corporation**

Corporate Environmental Affairs  
Occidental Chemical Center  
360 Rainbow Boulevard South, P.O. Box 728, Niagara Falls, NY 14302-0728  
716/286-3000



LIST OF FIGURES

Following  
Report

- |          |   |
|----------|---|
| FIGURE 1 | OFF-SITE AND ON-SITE CONSTRUCTION ACTIVITIES                            |
| FIGURE 2 | SOIL MOVEMENT/HAUL ROUTES   |
| FIGURE 3 | PROJECT AREAS FOR BEDROCK FORCEMAIN<br>AND TREATMENT PLANT CONSTRUCTION |

LIST OF PLANS

- |        |                    |
|--------|--------------------|
| PLAN 1 | FINAL GRADING PLAN |
|--------|--------------------|

## 2.0 SOIL SOURCE AREAS

Bedrock groundwater CMI activities will commence in the fall of 1994, and will be conducted in various on-Site areas throughout the Plant, along the Plant perimeter, and at off-Site areas adjacent to the Plant boundary. Figure 1 shows the on and off-Site bedrock CMI activities. Figure 2 shows the haul routes/soil movement pattern for these tasks. The project areas impacted by the treatment plant, forcemain/well construction and CMI general grading activities are shown on Figure 3. Activities occurring off-Site and on-Site are described as follows:

### 2.1 OFF-SITE AREAS

Bedrock groundwater CMI activities in off-Site areas are:

- Bedrock extraction well and monitoring well construction activities which will generate drummed materials such as soils, semi-solid materials (i.e., rock cuttings) and waste protective wear; and
- Bedrock forcemain and well chamber construction activities which will generate excess soils from forcemain installation and surface restoration activities.

### 2.2 ON-SITE AREAS

Bedrock groundwater CMI activities in on Site areas are as follows:

- Bedrock extraction well construction (as described for off-Site areas);
- Bedrock forcemain and well chamber construction (as described for off-Site areas); and
- Bedrock groundwater treatment facility construction which will generate excess soils from footing/building construction.

- Category C (NAPL Present)

During the excavation and soil screening activities to determine soil handling classification, soils encountered will be examined for Non-Aqueous Phase Liquid (NAPL) presence.

If identified within the off-Site soil materials excavated, those soils exhibiting NAPL presence will be transported to the F-Area for interim storage. These soils exhibiting NAPL presence will be characterized and disposed off Site at an appropriate permitted facility.

If NAPL is identified within the on-Site soils, these soils will be placed on and covered with plastic; when required they will be returned to the excavation from which they were removed as part of the backfill materials.

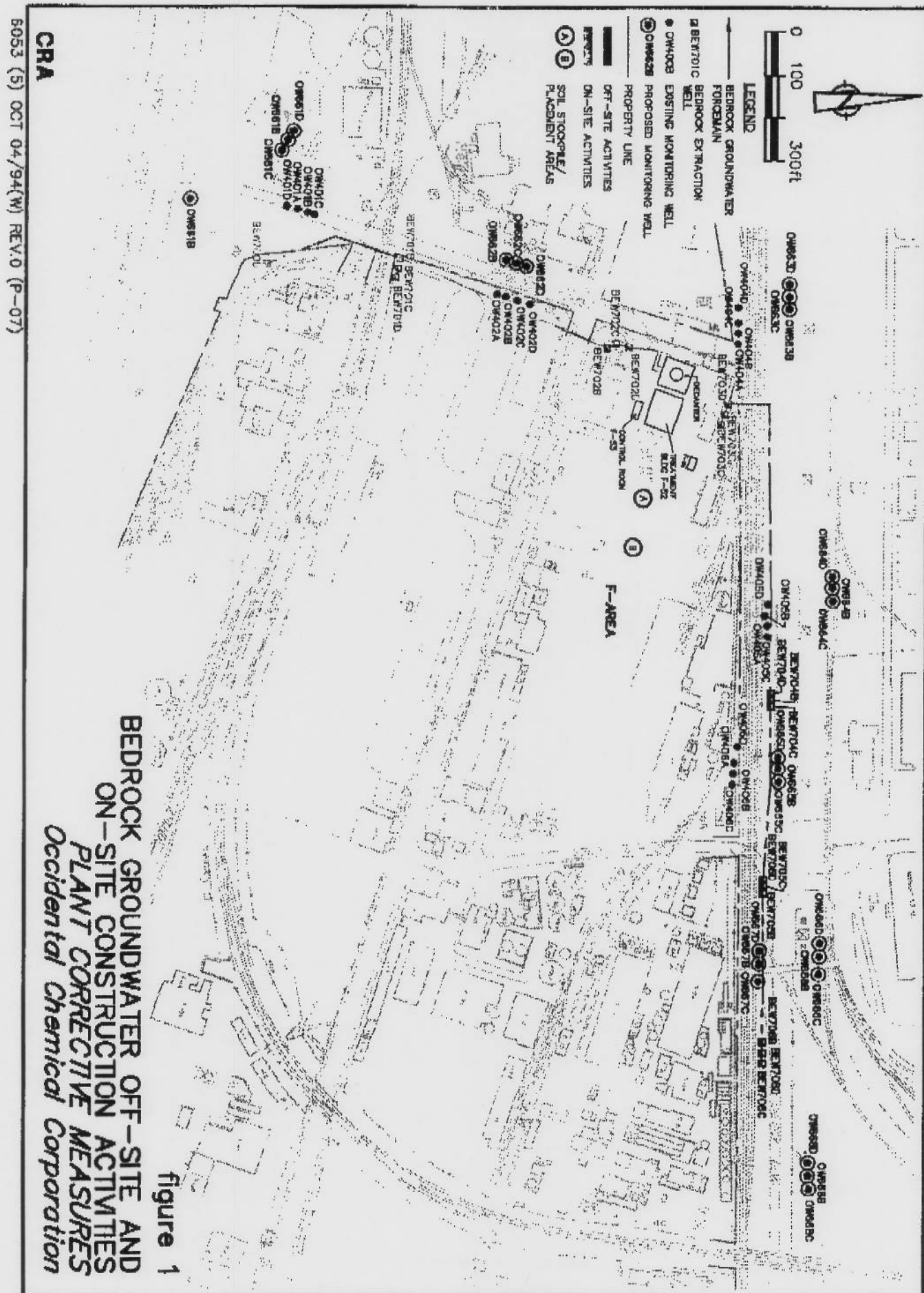
### 3.2 SOIL HANDLING/PLACEMENT/DISPOSAL

- Drummed Soils

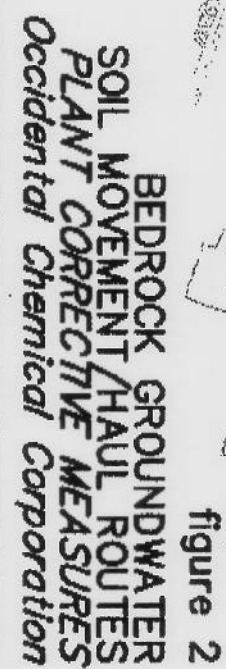
Drummed soils from well construction activities will be labeled and transported to the Plant, placed in an interim drum storage area and characterized to determine the appropriate off-Site disposal requirements. Once the waste characterization is complete, the drummed wastes will be sent off Site.

- Excess Soils

Soil requiring movement from construction areas on or off-Site will be transported by covered dump trucks following pre-established haul routes to minimize traffic on City streets, and maximize internal Plant travel where possible.







**figure 2**

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