New York State
Department of
Environmental Conservation

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DIVISION OF HAZARDOUS WASTE REMEDIATION

NEW YORK STATE

DEPARTMENT OF ENVIRONMENTAL CONSERVATION

50 WOLF ROAD

ALBANY, NEW YORK

CITIZEN PARTICIPATION PLAN

SCHRECK'S SCRAPYARD SITE

NIAGARA COUNTY, NEW YORK

9-32-099

OCTOBER 1988

CONTENTS

1.0 INTRODUCTION TO PLAN

The New York State Department of Environmental Conservation is committed to a citizen participation program as a part of its responsibilities for the inactive hazardous waste site remedial program. Citizen participation promotes public understanding of the Department's responsibilities, planning activities, and remedial activities at inactive waste disposal sites. It provides an opportunity for the Department to learn from the public information that will enable the Department to develop a comprehensive remedial program which is protective of both the public and the environment.

2.0 BASIC SITE INFORMATION

The Schreck's Scrapyard Inactive Hazardous Waste Site currently listed as a Class 2 site on the New York State Inactive Hazardous Waste Site registry is a one-acre site in the City of North Tonawanda, Niagara County, presently being operated as a junkyard by VJT Salvage, Inc. Waste oil containing Polychlorinated Biphenyls (PCB's) from transformer shearing operations were reportedly allowed to spill and soak into the ground. The Niagara river is located 700 feet to the west of the site and residential areas are located within 1000 feet of the site.

Schreck's Iron and Metal Company operated a scrap iron business at this site from 1951 to 1953. In 1953, the business was sold to Bengart and Memal, Inc., who reportedly operated a scrap metal business until 1977. In addition to the metal salvage operation, the site is believed to have been used as a transfer station for hauling phenolic waste from Occidental-Durez to local waste disposal facilities between 1951 and 1975. In 1965, reportedly approximately 50-60 drums of phenolic wastes were landfilled in a press pit located in the rear (south end) of the property. The drums were confined within the concrete walls of this 18 foot deep pit.

From 1960 to 1975, transformers from Niagara Mohawk Power Corporation were routinely brought to the site for salvage. The metal casings were sheared and the oil allowed to spill into the ground. The oil soaked ground was periodically excavated by a dozer and stockpiled along the eastern property boundary.

In 1983, the Lawless Container Corporation contracted with RECRA Research, Inc. (RECRA) to perform a site evaluation which included the collection and analysis of two surface (0-1 feet) and near surface (1-3 feet) soil samples from two locations at the site. The analyses of these samples indicated that PCB levels ranged between 18 and 66 parts per million (PPM) and heavy metals were substantially above background. Cyanide, phenolics and volatile organics were also present.

Figure 1 is a map showing the location of the Schreck's Scrapyard site within the City of N. Tonawanda and Figure 2 provides a site map.

3.1 Project Objective

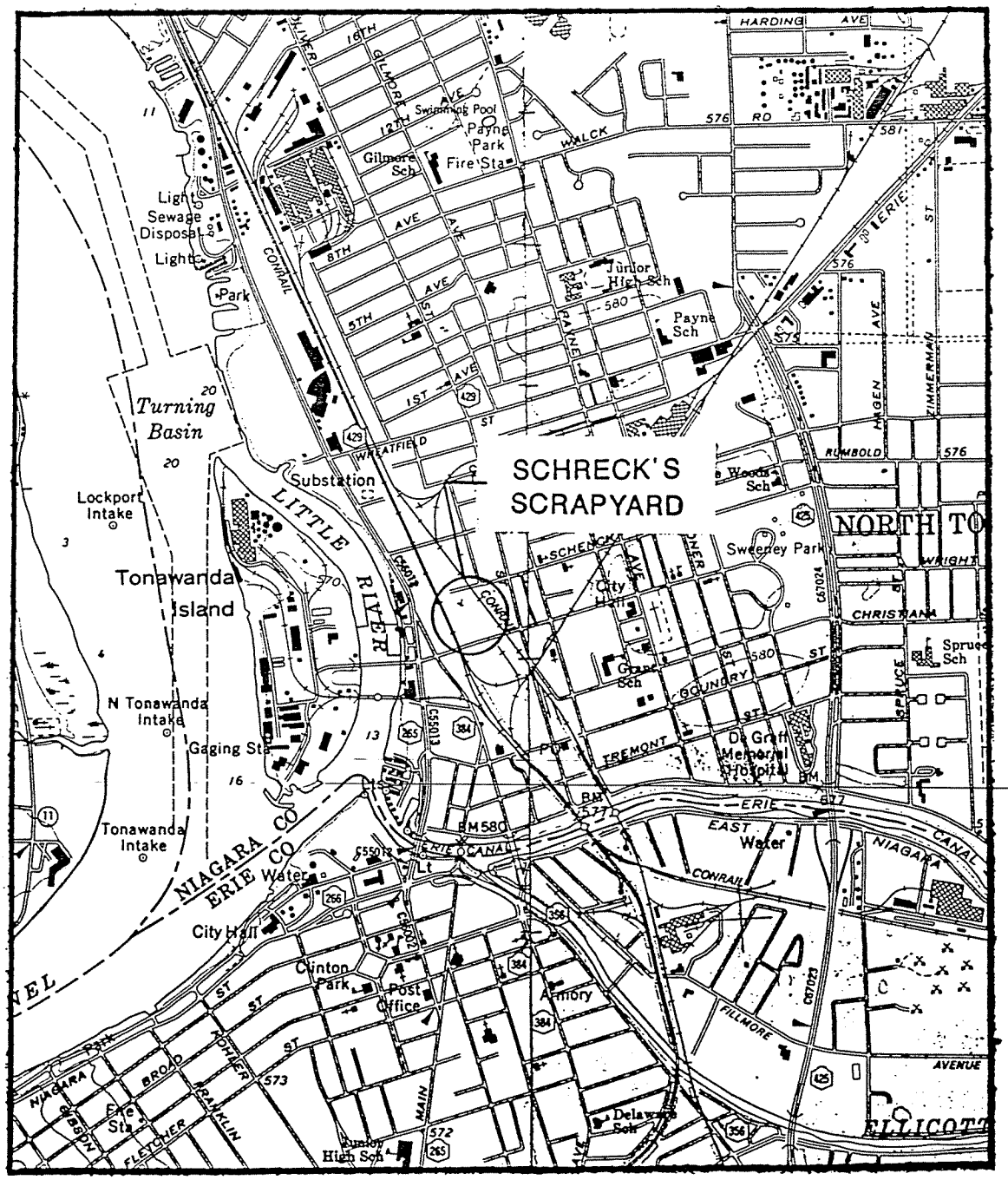
PROJECT DESCRIPTION - The main objective of the project is to investigate the nature and extent of contamination at the Schreck's Scrapyard site, to determine the contamination source(s), and to perform a Feasibility Study to identify, evaluate, and select a cost effective, environmentally sound, long term remedial action, and if necessary to prepare detailed design plans and specifications to complete the remedial construction. On February 1, 1988, a Request for Proposal (RFP) to seek the services of a qualified engineering firm for a Remedial Investigation/Feasibility Study (RI/FS) was issued.

Identification of Key Decision Points

1. Selection of a consultant.
2. Contract negotiations and contract award.
3. Acceptance of the Work Plan, Quality Assurance/Quality Control Plan, and the Health and Safety Plan.
4. Acceptance of first phase RI/FS report.
5. Acceptance of draft RI/FS report.
6. Acceptance of final RI/FS report.

FIGURE 1

SCHRECK'S SCRAPYARD SITE
NORTH TONAWANDA, NEW YORK



SCALE : 1"=2000'

LOCATION MAP

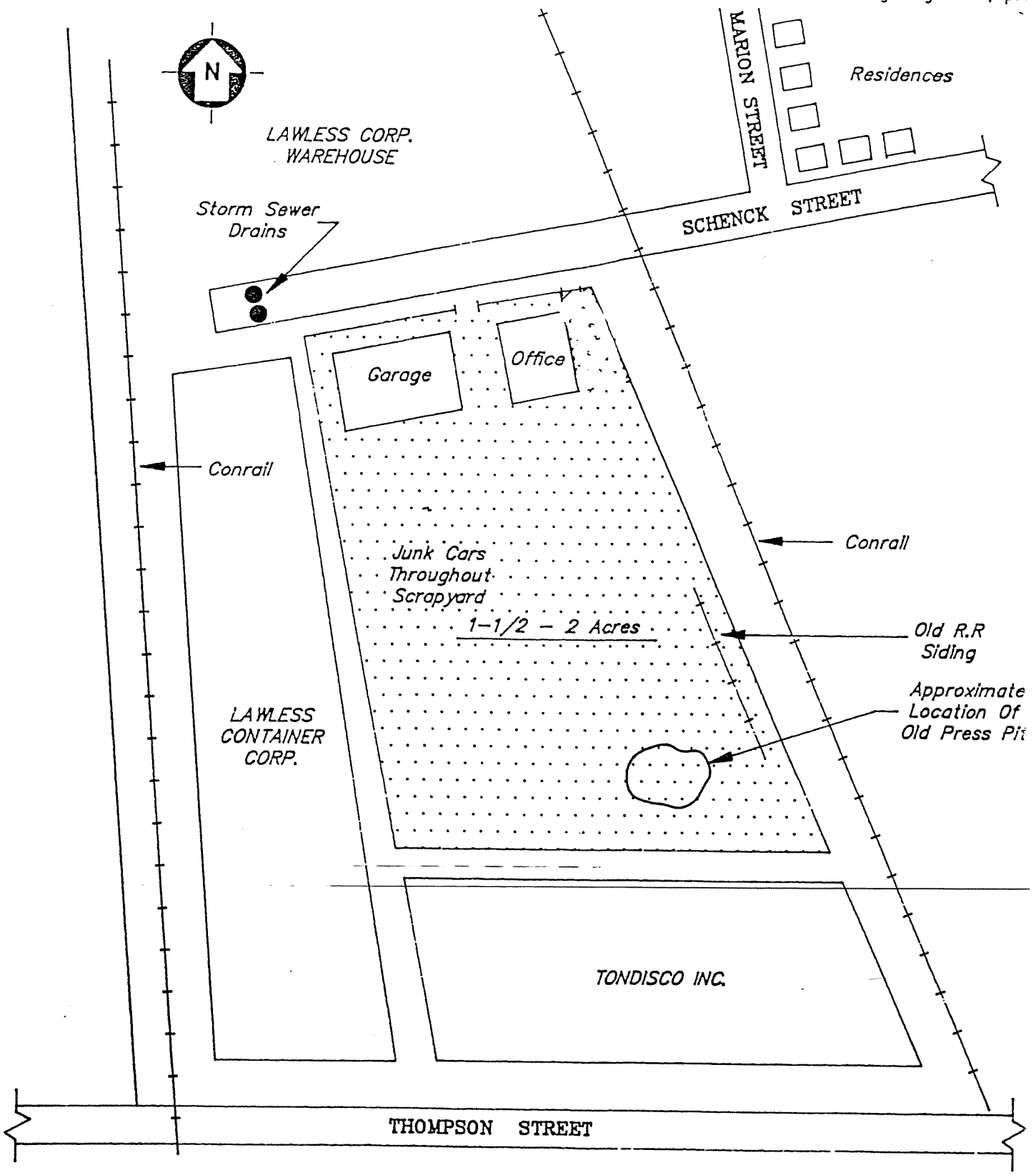


FIGURE 2
SCHRECK'S SCRAPYARD
N. TONAWANDA, NEW YORK

The remedial program for the Schreck's Scrapyard site will be organized into four major Work Elements as listed below:

Work Element I - A Remedial Investigation will be conducted to collect all necessary data to define the source of the contamination, the extent of the contamination, and the need for long-term remedial actions at or around the site.

Work Element II - A Feasibility Study to develop and evaluate a long-term, cost effective, environmentally sound, comprehensive remedial action for the site.

Work Element III - A detailed design of the comprehensive remedial action chosen for the site.

Work Element IV - Construction of the remedial action chosen for the site.

The NYSDEC is investigating this site under the State Superfund Program. A contract for the Schreck's Scrapyard site was negotiated between NYSDEC and Eder Associates P.C. for an RI/FS at this site which can be extended to include Design and Construction Management of the chosen remedial alternative.

3.2 The major components for an RI/FS (Work Element I and II) are as follows:

(i) Scoping of RI/FS: Assemble and evaluate existing data, develop work plan, QA/QC plan, health and safety plan.

(ii) Site Characterization: Perform necessary field investigation to characterize the site.

(iii) Develop Alternatives: Identify potential remedial action alternatives.

(iv) Initial Screening of Alternatives: Screen the alternatives based on three broad criteria of effectiveness, implementability and cost.

(v) Post Screening Field Investigation: Perform additional field investigation work if necessary for further evaluation of alternatives.

(vi) Detail Analysis of Alternatives: Conduct detailed evaluation on the limited number of alternatives.

(vii) Selection of Remedy: Select a remedial alternative and prepare a conceptual design of the selected alternative.

3.3 Schedule of Remedial Program

Anticipated Date

Fall	1988	- Submittal of Draft Work Plans
Fall	1988	- Public Meeting
Fall	1988	- Final Work Plans
Fall	1988	- Field Investigations
Spring	1989	- First Phase RI and First Phase FS Summary Report
Spring	1989	- Public Meeting
Spring	1989	- Draft Remedial Investigation FS Report
Summer	1989	- Public Meeting/Comment
Summer	1989	- Selection of Remedy
Summer	1989	- Public Meeting (Optional)
Fall	1989	- Final Remedial Investigation/Feasibility Study Report

4.0 IDENTIFICATION OF AFFECTED AND/OR INTERESTED PUBLIC (CONTACT LIST)

4.1 Names, addresses and/or phone numbers of State and local elected officials and organizations, representing the affected community are given in Appendix A, Attachment 1.

4.2 Names, of the Potential Responsible Parties are included in Appendix A, Attachment 2.

4.3 Names, addresses and/or phone numbers of all people and organizations expressing an interest in receiving newsletters, fact sheets, status reports etc. with respect to the activities at the Schreck's Scrapyard site are provided in Appendix A, Attachment 3.

4.4 Names, addresses and/or phone numbers of the local media (newspapers, radios, and TV stations) are provided in Appendix A, Attachment 4.

Any person interested in adding his/her name to the mailing list may contact the Department contacts listed in Section 5.0 below.

5.0 DEPARTMENT CONTACTS

NYSDEC Central Office:

Mr. Robert W. Schick, P.E., Chief, Remedial Section A
New York State Department of Environmental Conservation
50 Wolf Road, Room 222
Albany, NY 12233
(518) 457-4343

Regional Office Contact:

Mr. John Tygert, P.E.
New York State Department of Environmental Conservation
600 Delaware Avenue
Buffalo, NY 14202
(716) 847-4585

Citizen Participation Specialist:

Ms. Patricia Nelson
New York State Department of Environmental Conservation
600 Delaware Avenue
Buffalo, NY 14202
(716) 847-4590

NYSDEC's "800" number, staffed by members of NYSDEC's Citizen Participation Unit who will listen to your question and try to provide an immediate answer or will get back to you as soon as possible with accurate information. 1-800-342-9296.

6.0 DOCUMENT REPOSITORY

Documents related to remedial activities at the Screck's Scrapyard site are available for public review. The documents are available at:

1. North Tonawanda Public Library
   505 Meadow Drive
   N. Tonawanda, New York 14120

2. New York State Department of Environmental Conservation
   Region 9 Office
   600 Delaware Avenue
   Buffalo, NY 14202
   (716) 847-4585 (By Appointment)

3. New York State Department of Environmental Conservation
   Division of Hazardous Waste Remediation
   Bureau of Western Remedial Action
   50 Wolf Road, Room 222
   Albany, NY 12233
   (518) 457-4343 (By Appointment)

Documents which will be placed in the document repository as they become available include:

- Phase I Report
- Request for Proposals
- Works Plans for the Remedial Investigation/Feasibility Study
- Scope of Work for Engineering Contracts
- Remedial Investigation Report

- Feasibility Study Report (draft and final)
- Remedial Design Document (draft and final)
- Plans and Specifications for Remedial Construction
- Quality Assurance/Quality Control Plans
- Health and Safety Plans
- All Responsiveness Summaries
- The Site Specific Public Participation Plan and
- All Fact Sheets and Newsletters (if any)

7.0 DESCRIPTION OF SPECIFIC CITIZEN PARTICIPATION ACTIVITIES FOR EACH MAJOR ELEMENT OF THE REMEDIAL PROGRAM

This section describes the specific citizen participation activities planned to be carried out during the site's remedial program. These activities will be developed in phases as the remedial program progresses and may be modified as the project manager and the assigned Citizen Participation Specialist gains additional insight into local interest in citizen participation and the project or as the technical program and information about the site changes.

Below are listed the major elements of the Schreck's Scrapyard site remedial program. For each program element, the citizen participation activities that shall take place are listed.

Issuance of Contract - A notice was given to the local media and local officials, on copy of which is included in Appendix A as attachment 5:

- name of contractor - Eder Associates
- Field work is expected to start - in the Fall of 1988
- brief description of site - See Section 2.0
- identify contact person - See Section 5.0

A summary of the scope of work included in this contract is available at the document repository.

During the Development of the Scope of Work for the RI/FS

1. Give public notice of the availability of a draft work plan in the document repository for the RI/FS, using the contact list. This notice is included as Appendix A, attachment 6.

2. Public Meeting to be held - November 16, 1988, 7:00 p.m., North Tonawanda City Hall.

3. Incorporate, as appropriate, the results of the Public Meeting and other questions and concerns received by the project manager or Citizen Participation Specialist through the mail, telephone, etc. into work plans.

4. Prepare and distribute to mailing list brief synopsis of Public Meeting and review of questions, concerns, comments received from public.

5. Place final work plan in the document repository.

When the First Phase RI/FS is Publicly Available

1. Public notice of the availability the report of the initial phase of the RI/FS will be provided to the contact list. The notice shall include:

   - brief description of the site
   - objectives of the RI/FS
   - summary of work completed in first phase of the RI/FS
   - summary of findings
   - location where report is available
   - schedule for remainder of RI/FS
   - identify contact person
   - location where report is available
   - announce date, time and place of Public Availability Session to review report
   - identify contact person

2. The Document will be available in the project document repostory.

3. Availability Session - The purpose of the sessions are to:

   - present the report
   - discuss possible remedial alternatives
   - receive public comment
   - describe future work
   - prepare and distribute to mailing list a brief synopsis of the Public Availability sessions and review of questions, concerns and comments received by the project manager through the availability sessions, mail, telephone, etc.

FINAL DRAFT RI/FS REPORT IS PUBLICLY AVAILABLE

1. A minimum of one copy of the final draft RI/FS report will be available in the project's local document repository.

2. Publish a legal notice in a local newspaper of general circulation. Purpose of the legal notice is to:

   - provide a brief analysis of the proposed remedial program
   - summarize the Department's reasons for selecting the proposed program over proposed alternatives
   - describe the construction and operational requirements of the proposed program

3. Mail public notice of the availability of the final draft RI/FS to the contract list. Purpose of the notice is to:

   - briefly describe the site
   - provide overview of work completed in the RI/FS
   - summarize the findings of the RI/FS
   - provide a brief analysis of the proposed remedial program
   - summarize the Department's reasons for selecting the proposed program over proposed alternatives
   - request information and comment which may be useful in finalizing RI/FS

- identify the project's local project repository
- announce a comment period of at least 30 days for written comments

4. Hold public meeting. Purpose of the meeting is to:

   - present the final RI/FS Report
   - discus briefly remedial alternatives considered
   - describe in detail the most promising alternative and how this alternative mitigates problems at the site
   - receive public comment
   - present schedule for future work

5. Prepare transcript of the public meeting. The transcript shall be made available for public inspection at the project's local document repository.

6. Provide at a minimum a 30-day period for submission of written comments about the fianl draft RI/FS report.

7. Publish a legal notice in a local newspaper of general circulation. Purpose of the legal notice is to:

   - provide a brief analysis of the remedial program selected for implementation
   - discuss any significant changes from the proposed remedial program
   - provide a response to significant comments, criticisms and new data

8. Prepare and mail a brief responsiveness summary to the contact list and attendees of the public meeting. Purpose of the responsiveness summary is to:

   - provide a brief analysis of the remedial program selected for implementation
   - discuss any significant changes from the proposed remedial program
   - provide a response to significant comments, criticisms and new data

9. If the remedial program implemented differs significantly, publish a legal notice in a local newspaper of general circulation. Purpose of the legal notice is to:

   - Provide an explanation of the significant differences and the reasons such changes were made

When the RI/FS is final, NYSDEC will prepare a Record of Decision for the Schreck's Scrapyard site which will document the decision process used to determine the remedial actions deemed appropriate for this site. At that time, the Citizen Participation Plan will be updated to address the specific citizen participation activities to be initiated during the Design and Construction of the chosen remedial action for the Schreck's Scrapyard site.

APPENDIX A

ATTACHMENT 1

State and Local Elected Officials and Organizations

Name and Address	Telephone Number
1) Honorable Elizabeth Hoffman City Hall 216 Payne Avenue N. Tonawanda, New YOrk 14120	(716) 695-8540
2) Honorable John B. Daly NYS Senate - District Office 1316 Main Street Niagara Falls, New York 14301	
3) Honorable Joseph Pillittere New York State Assembly 1700 Pine Avenue Niagara Falls, New York 14301	
4) Honorable Matthew Murphy New York State Assembly 131 East Avenue Lockport, New York 14094	
5) Mr. Duane Sledzinski City Council - President City Hall Clerk's Office 216 Payne Avenue North Tonawanda, New York 14120	
6) Mr. Mark Narowski Alderman - 1st District City Clerk's Office 216 Payne Avenue North Tonawanda, New York 14120	
7) Mr. Michael Hopkins Niagara County DOH Falls and 10th Street Box 428 Niagara Falls, New York 14302	(716) 284-3128
8) Mr. Richard Shanely Niagara County Legislature County Courthouse Lockport, New York 14094	
9) Mr. Michael Eisenhaur Assistant Civil Engineer City Hall 216 Payne Avenue North Tonawanda, New York 14120	
10) Ms. Sarah Hood Alderwoman 2nd District City Clerk's Office 216 Payne Avenue North Tonawanda, New York 14120	

ATTACHMENT II

Potential Responsible Parties

1) Bengart and Memal, Inc.

2) Tennis Schreckengost Estate

3) Occidental Chemcial / Hooker Durez, Inc.

4) Niagara Mohawk, Inc.

5) VJT, Inc.

ATTACHMENT III

People and Organizations expressing interest in receiving newsletters factsheets, status reports, etc. with respect to activities at the Schreck's Scrapyard Site

Name and Organization	Address and Phone Number
1) Honorable Elizabeth Hoffman	City Hall 216 Payne Avenue N. Tonawanda, New York 14120
2) Mr. Michael Eisenhaur	City Hall 216 Payne Avenue N. Tonawanda, New York 14120
3) Niagara County DOH	10th and Falls Street Box 428 Niagara Falls, New York 14302

NOTE: This list will be expanded as per individual requests.

ATTACHMENT IV

Names of Local Media

Name and Address

1) Niagara Falls Gazette
310 Niagara Street
Niagara Falls, New York 14303

2) Tonawanda News
435 River Road
N. Tonawanda, New York 14120

3) WJJL - 1440 AM
1224 Main Street
Niagara Falls, New York 14301

4) WGR Radio 550
464 Franklin Street
Buffalo, New York 14202

5) WBEN - Radio 930
2077 Elmwood Avenue
Buffalo, New York 14207

6) Buffalo News
One News Plaza
Buffalo, New York

New York State Department of Environmental Conservation
50 Wolf Road, Albany, New York 12233

Thomas C. Jorling
Commissioner

M E M O R A N D U M

TO: Madeline Lewis, Assist. Commissioner, Office of Public Affairs

FROM: Michael J. O'Toole, Jr., P.E., Director, Division of Hazardous Waste Remediation

RE: Press Release

DATE: September 20, 1988

Project Description:

The NYSDEC has awarded a contract to conduct a State Superfund Remedial Investigation/Feasibility Study (RI/FS) at the Schreck's Scrapyard site which is located in the City of North Tonawanda, Niagara Falls, New York.

Consulting Engineer:

Eder Associates, Inc. of Locust Valley, New York, is the consulting engineer that has been selected to perform the RI/FS for the Schreck's Scrapyard site. The total dollar amount for this contract is $517,664.

Department Contract:

DHWR Engineer: Robert W. Schick, P.E. Telephone No. 518-457-4343

cc: E. Sullivan
J. Spagnoli, Regional Director, Region 9

bcc: M. O'Toole (2)
J. Willson
R. Schick
P. Buechi
S. Scharf

SCHEDULE 1: SCOPE OF ENGINEERING SERVICES

Project Approach

Eder Associates Consulting Engineers, P.C.(EA) proposes to conduct a phased and integrated Remedial Investigation/Feasibility Study (RI/FS) work plan: 1) which performs the RI and FS components in step to ensure that the information needed to support the evaluation of alternatives in the FS is available; and 2) which collects the data in a cost-effective and timely manner in accord with a focused work plan used successfully at other salvage yard sites and many other types of hazardous waste sites.

The RI/FS will be organized and implemented in accord with the phased approach specified by USEPA, OSWER Document 9355.0 (12/24/86) and the NYSDEC RFP (5/88).

TASK I - SCOPE THE REMEDIAL INVESTIGATION AND FEASIBILITY STUDY

Subtask A. - Evaluation of Existing Data

EA will conduct a telephone and file search to assemble and evaluate all existing data on the site. This will include one site visit by the project manager and the senior hydrogeologist to review the NYSDEC files, available past operating records, interviews with current operators of the salvage yard, interviews with the city engineer, and the County and State Health Department.

This information will be summarized in the RI report and will serve as a basis for modifying the proposed work plan.

Subtask B. - Work Plans

A work plan will be developed to describe the scope of the RI and FS in detail.

An acceptable site specific Quality Assurance/Quality Control Plan (QAPP) will be developed for the RI/FS. The plan will include sampling and analysis protocols to ensure that the data obtained is of sufficient quality to support the RI/FS process. All laboratory work will conform to the NYSDEC laboratory protocols and will be implemented in accord with a site specific QAPP. The QAPP will include the 16 quality control (QC) elements identified in the USEPA Interim Guidelines and Specifications for preparing QAPPs (USEPA 600/4-83-004).

We intend to retain a certified laboratory to describe and document QAPP procedures for all project related laboratory work.

An acceptable Health and Safety Plan (HASP) will be prepared. An existing CERCLA HASP developed by EA will be revised to address site specific hazards that the investigation may present to personnel and to the surrounding community. The Plan will address all applicable regulatory requirements including personnel responsibilities, training and medical surveillance. The plan will identify problems or hazards that may be encountered and their solutions and will include procedures to protect third parties. The plan will be consistent with USEPA Standard Operating Safety Guides, and current OSHA proposed rules and guidelines which are consistent with site conditions. The plans will be modified to address all comments by the NYSDEC.

Subtask C. - Meeting with the NYSDEC/Public Meeting

EA will assist the NYSDEC in discussing the technical aspects of the Task I work at any public informational meeting held by the NYSDEC.

TASK II - SITE CHARACTERIZATION
(First Phase Remedial Investigation)

Subtask A. - Field Investigation and Data Evaluation

From this point, the RI and FS will be conducted concurrently to identify the environmental and human health threats posed by the site and the appropriate and cost-effective remedial responses available.

The following field investigation plan is intended to define the nature and extent of contamination which the contamination poses or may pose to human health, welfare and the environment. This includes: the source of contamination (extent and characteristic); migration pathways; receptors along pathways who may be at risk; extent or expected extent of contaminant migration; fate and transport of the contaminants along the migration pathways; information needed to evaluate remedial measures for the threats posed by the contamination; and other appropriate factors.

The proposed plan is based upon our review of information supplied by the NYSDEC with their RFP, observations during the pre-proposal site visit, discussions with the Niagara County Department of Health and the North Tonawanda City Engineer, and our experience with RI/FS's at similar salvage yards.

FIELD INVESTIGATION PLAN

The following field work is proposed for the initial phase of work at the site (Figure 1).

Initial Air Sampling Plan

An air sampling plan will be implemented prior to the start of field work to support the requirements of the HASP. Initial air sampling will be performed using an OVA and Hnu around the site before any site work is conducted. This sampling will serve the HASP requirements and will evaluate off-site air emissions.

Visual Inventory

A visual inventory will be made to categorize above grade wastes and how they may relate to the investigation and to describe present and past activities conducted at the site and how they may affect the investigation. Any information obtained from the visual inventory may be used to modify the proposed work plan.

Geophysical Survey

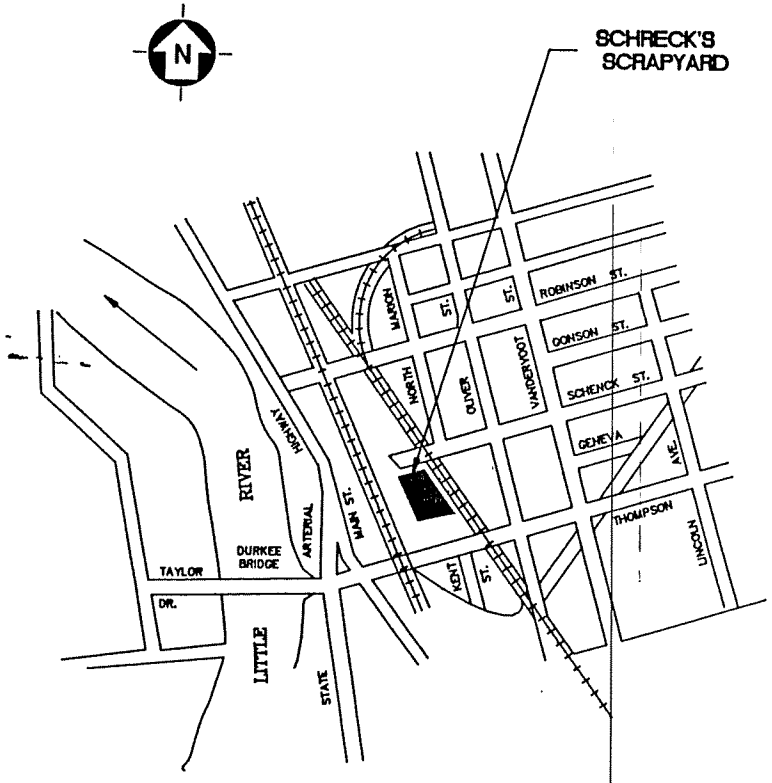
A ground penetrating radar and magnetometric survey will be conducted on-site in an attempt to define clusters of drums, underground tanks, cables, lateral fill dimensions, and the extent of on-site contaminated groundwater. The information obtained will be used as a guide when setting up the 36 point grid sampling plan to ensure drums, cables and/or other objects are not damaged during sampling and when the mounds located on the site are disturbed to expose the piles for representative sampling.

Soil and On-Site Waste Sampling

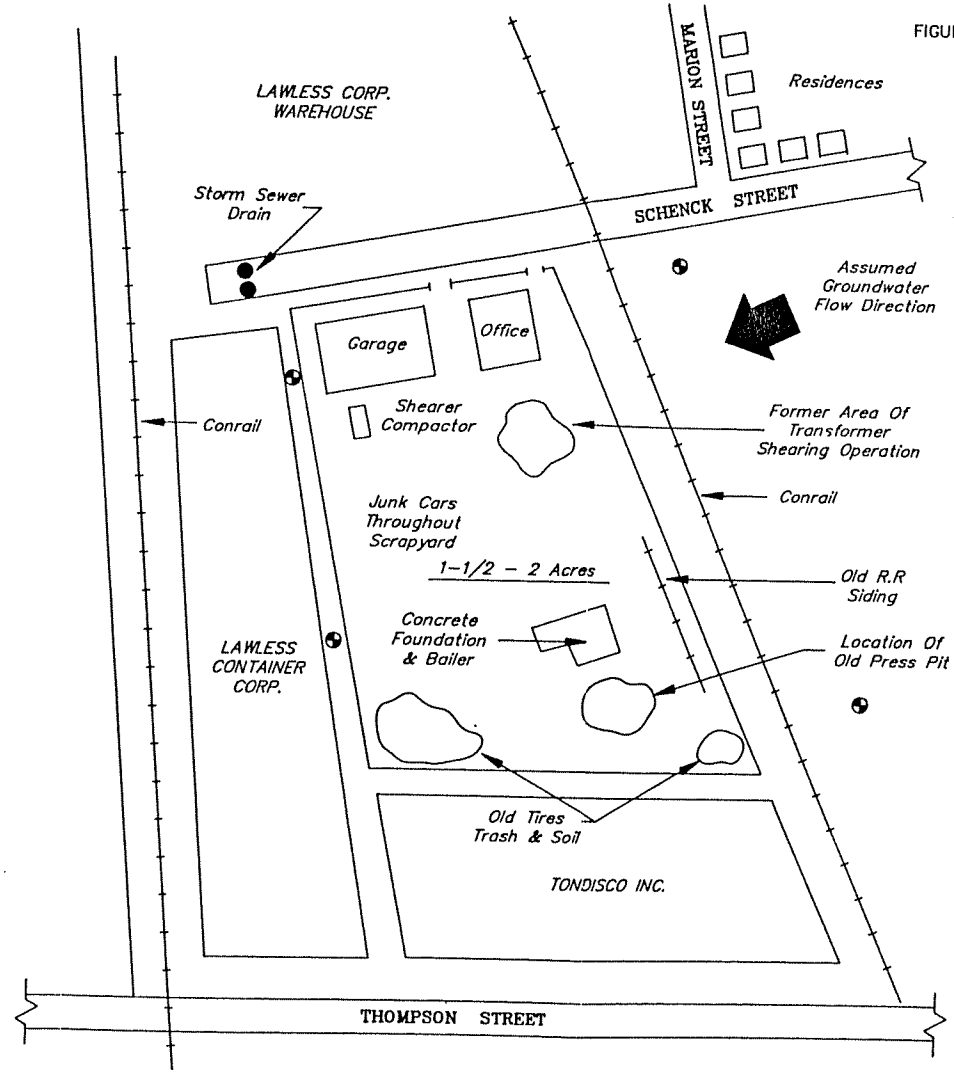
Sampling will be performed to characterize on-site waste and contaminated soils. Visual evidence of contamination found during the prior on-site soil sampling shows contamination extending to the maximum depth sampled (approximately 3 feet). Some perched or shallow groundwater was also found at several levels.

Sampling the on-site soils, in general, will be conducted from the surface down to the water table. All soil removed during off-site sampling will be drummed and stored on-site for proper disposal based on the sampling results. Since PCB laden soils may have been moved about the site, a grid similar to the 36 point grid, extending from the Lawless Container Corporation building to Tondisco, Inc. building to Schenck Street to the Conrail train tracks (area includes Right-of-Way between Schreck's site and Lawless Container Corporation), used in previous sampling will be incorporated in this phase of the work. The information collected during the geophysical investigation will be used as a guide so we do not puncture drums or damage cables or other metal objects during the general soil sampling. The sample grid will be developed to ensure that typical samples are collected where cars have been stacked or disassembled. Samples will be collected with a split spoon sampler continuously advanced from grade to the water table by a drilling rig. For each borehole, boring logs will be developed from field notes and keyed to the sampling horizons to identify subsurface conditions at the site.

FIGURE 1



LOCATION PLAN
NTS



LEGEND

● MONITORING WELL LOCATIONS

SITE PLAN

SCHRECK'S SCRAPYARD
N. TONAWANDA, NEW YORK

Grid Sampling Schedules

Three samples, one from the private residence on Schenck and Marion and two in the right of way near Lawless Container Corporation will be collected at level 1, at a depth of 0 - 1.5 feet and analyzed for TCL volatiles, semi-volatiles, pesticides, PCB's and metals. Six samples will be collected at level 2, at a depth of 1.5 - 3 feet and analyzed for TCL volatiles, semi-volatiles, pesticides, PCB's and metals. The suggested location of the samples are: 2 samples from the right of way, 1 sample from the former area of transformer shearing operations, 1 sample at the shearer compactor, 1 sample in the bailer area and 1 sample along the rail road tracks. In addition, a sample at each grid point for level one and two and a composite sample at level three, four, five... (at a depth from approximately 3 - 10 feet, depending upon groundwater depth) will be obtained and analyzed for TCL pesticides/PCB's.

General Site Sampling Schedule

Two mounds of waste and soil are located in the southeast and southwest corner of the site. A backhoe will be used to expose the piles and three samples from each mound will be obtained and analyzed for TCL volatiles, semi-volatiles, pesticides, PCB's and metals to define the extent of contamination throughout the pile. The geophysical survey will be used as a guide to ensure that samples are collected safely and are representative of the mounds. Based on the data obtained from analysis of the preliminary mound samples, additional boring samples would be taken from the area beneath the mounds at the standard level 1 and 2 and analyzed for TCL Pesticides/PCB's then composited and analyzed for TCL volatiles, semi-volatiles, and metals.

Five samples will be collected and analyzed for TCL volatiles, semi-volatiles, pesticides, PCB's and metals from areas of concern where specific operations were conducted and which may have caused contamination. These areas may include the base of the bailer near the old concrete foundation and the hydraulic machinery located near the back of the garage which apparently is used for shearing or compacting metal. An additional five soil samples will be collected from the old press pit where drums of phenolic waste are supposedly buried.

Four representative samples along the property perimeter will be collected in addition to the grid sampling from the area near the old railroad siding which had been used for the removal of the bailed transformer scrap and in areas where there is evidence that water ran off and collected, in the area identified as the transformer shearer and, in front of the two gates along the north property line.

Four sediment samples will be obtained from the storm sewer catch basins and manholes and analyzed for TCL volatiles, semi-volatiles, pesticides, PCB's and metals. Based upon the results of this analysis, further sampling may be required under Task V downstream in the sewer system and in the river, river sediments and wetlands which may be affected.

From our previous experience with junk yards where PCB transformers were salvaged, we have found a major problem with PCBs tracked off-site onto the roads by motor vehicles. The best method to initially identify materials that have been tracked on roads is to either take samples along a transect of materials remaining on the road or obtain grab samples of residual soil accumulating by the curbside. We anticipate that the greatest road related contamination will be found close to the site and we propose to start sampling the road immediately adjacent to the site as an indication of whether this type of contamination exists and to establish the need for further off-site sampling of roads and roadside areas. As part of the initial site investigation four soil samples will be obtained from identified areas of soil collection along the road and analyzed for TCL volatiles, semi-volatiles, pesticides, PCB's and metals.

Groundwater Sampling

No wells are known to exist between the site and the river to the west of the site which is the most probable discharge point for any groundwater beneath the site. The County Health Department and the NYSDEC are concerned over contaminated discharges to the river in this area since municipal water intakes lie in the main river channel directly west of the site. We will phase the groundwater evaluation in order to provide information in this area most cost-effectively.

Wells will be installed during the initial phases of the groundwater investigation. Wells will be installed at two downgradient locations and two upgradient locations. One deep boring will be advanced at the a downgradient location to bedrock to define the stratigraphy at the site. One soil sample will be obtained from saturated material to define the grain size distribution. A well intersecting the water table (10' screen) will be installed at each location and a shallow well may be installed to intercept perched water if found.

Wells will be drilled with a hollow stem auger so that perched water conditions can be identified. All wells will be drilled in accordance with the NYSDEC approved specifications and protocols.

Rising and falling head slug tests will be performed to estimate the coefficient of permeability and the approximate flow rate in the saturated and unsaturated zones. Electronic transducers will be used to accurately measure the rise and fall of the water during the slug test. Eight groundwater samples will be collected and analyzed for TCL volatiles, semi-volatiles, pesticides, PCB's and metals.

A licensed surveyor will be retained to locate all sample points and identify all well evaluations on a drawing.

Data Evaluation and Draft RI Report

The field data collected in the initial and subsequent work phases will be evaluated and validated to ensure it is sufficient to conduct the FS and meets the quality requirements of the QAPP. A technical memoranda will be prepared to present raw data to the NYSDEC as it becomes available.

A draft RI report will be prepared presenting the data, a description of the nature and extent of contamination at and emanating from the site, present and future impacts, environmental and human receptors and the information needed to assess remedial alternatives in the FS. The Health and Environmental Risk Assessment (Subtask D) will be included in the report.

Subtask B. - Redefine Study Area Boundaries

The various sampling efforts conducted in Subtask A will identify the extent of on-site and probable off-site contamination. The boundaries of the RI/FS study area will be redefined to include the extent of off-site contamination identified in Subtask A.

Subtask C. - Applicable or Relevant and Appropriate Requirements (ARARs)

ARARS will be identified for the hazardous substances at the site. A memorandum will be prepared presenting the identified ARARs to the NYSDEC for review.

Subtask D. - Health and Environmental Risk Assessment (HEA)

This Subtask compiles and organizes the RI data in a format that identifies the relationships between the site investigation, the site conditions and the degree of risk.

The Task I work plan will identify the general outline of a site specific HEA. Once the data is available and we have a clear understanding of the site conditions and potential impacts, a detailed HEA plan will be developed by Eder Associates in accordance with the USEPA Superfund manual for the NYSDEC approval and we will then perform the assessment. We anticipate that a five part HEA will be developed.

Part 1 - Identification of Contaminants

This part will identify contaminants at the site that have the greatest potential of release or pose the greatest threat to public health or the environment.

Part 2 - Exposure Assessment

This part will identify actual and potential exposure routes, characterize the populations exposed and determine the extent of exposure.

Part 3 - Toxicity Assessment

This part will determine the nature and extent of health and environmental hazards associated with exposure to contaminants present at the site.

Part 4 - Risk Characterization

This part will estimate the incidence of adverse health and environmental effects under the present and future exposure scenarios defined in the exposure assessment. This part will also develop the remedial response requirements and objectives for the remedial actions developed in the FS.

Part 5 - HEA Report

A report presenting the results of the HEA will be prepared as a section of the draft RI report.

TASK III - DEVELOPMENT OF ALTERNATIVES
(First Phase Feasibility Study)

Information from Tasks I and II will be evaluated to determine the need for source control and/or groundwater response actions supplemented if necessary by removal.

Subtask A - Operable Unit Determination

We will use the available site specific information to determine the need for immediate removal actions and whether or not the RI/FS should be developed in terms of operable units. A memorandum describing the need for operable units at the site will be prepared for the NYSDEC.

Subtask B - Identify Potential Remedial Alternatives

This subtask will describe a number of remedial technologies that may be applicable to the Schreck site. These technologies will be selected based on the remedial objectives derived in Task II, the HEA and in Task III, Subtask A. This Subtask will be sequenced to develop and evaluate the technologies while eliminating redundant work.

A master list of potentially feasible technologies will be developed to include both on-site and off-site remedies.

A number of response actions related to groundwater, surface water and surface soil quality will be developed within performance ranges developed initially from engineering judgment and preliminary RI information.

If any combination of response actions is required, the remedial elements will be formulated together to assure that the comprehensive remedial action will be effective and that the individual remedial elements will be complimentary. The first phase of the FS Development of Alternatives will be described in a draft section of the FS.

Subtask C - Meeting With the NYSDEC/Public Meeting

We will discuss the technical aspects of the First Phase Remedial Investigation and Feasibility Study at any public informational meeting scheduled by the NYSDEC.

TASK IV - INITIAL SCREENING OF ALTERNATIVES
(Second Phase Feasibility Study)

Subtask A - Initial Screening of Alternatives

The potential remedial action alternatives will be subjected to an initial screening to narrow the list for detailed analysis. The rationale for this initital screening will be based on SARA requirements and will include the following factors: effectiveness, implementability and cost.

The initial screening of alternatives will be presented in a draft section of the FS report which will describe the alternatives surviving the screening and contain a description of the alternatives including the extent of remediation, contaminant levels to be addressed, and treatment methods, along with a list of Federal and State ARARs which are relevant or appropriate to the FS.

Subtask B - Evaluation of Guidance Criteria and Meet with the NYSDEC

Other criteria, advisories or guidance needed to supplement the ARARs or to protect human health and the environment that must be assessed at this stage of the study will be identified.

We will meet with the NYSDEC to present the information developed in Subtask A and to discuss the possibility of achieving compliance with the ARARs.

TASK V - POST-SCREENING FIELD INVESTIGATIION
(Second Phase Remedial Investigation)

Subtask A - Literature Search & Work Plan Development

A literature search will be conducted to identify all available information which describes the remedial alternatives which survived the initial screening.

The work plan developed in Task I Subtask B will be revised to include the proposed site activites for Task V subtasks B & C.

Subtask B - Bench & Pilot Scale Treatability Tests

Bench/pilot tests will be implemented to evaluate the alternatives which consider the site-specific physical matrices and hazardous constitutent mixtures involved. Any request for such testing will include a detailed rationale for the work, suggested laboratory and monitoring and a data analysis protocols.

Subtask C - Secondary Field Work, Data Analysis and Report Preparation

Secondary Field Work

We will also supplement the Task II field investigation data base as necessary to refine the site specific data or to improve the data base on the applicability, cost and problems inherent in implementing the various treatment technologies. Additional sampling will be performed to further define and characterize the on- and off-site contamination.

Soil and On-Site Waste Sampling

Five sediment samples will be obtained from the storm sewer catch basins and manholes. Ten samples of river sediments down stream from the sewer discharge system will be taken and analyzed for TCL volatiles, semi-volatiles, pesticides, PCB's and metals to further define the affected area.

Based on the data obtained from Task II Subtask A additional sampling will be performed in the areas of:

1) soil collection along the road (4 samples) and analyzed for TCL volatiles, semi-volatiles, pesticides, PCB's and metals
2) area of concern along the property perimeter (4 composite samples) and analyzed for TCL volatiles, semi-volatiles, pesticides, PCB's and metals
3) soil around the drums at the old press pit (4 composite samples) and analyzed for 2,3,7,8, TCDD

Groundwater Sampling

Three shallow wells will be installed to define the plume movement off-site. The existing eight wells installed in Task II Subtask A will be purged and sampled to provide a comparison of the data obtained during the initial field investigation A total of eleven groundwater samples will be obtained and analyzed for TCL volatiles, semi-volatiles, pesticides, PCB's and metals. Slug head tests for the new wells will be performed to approximate flow rates in the saturated and unsaturated zones.

All wells will be drilled in accordance with the NYSDEC approved specifications and protocols.

Data Evaluation and Draft Report

The field data collected will be evaluated and validated to ensure it is sufficient to conduct the FS and meets the quality requirements of the QA/QC plan. Technical memoranda will be prepared to present raw data to the NYSDEC as it becomes available.

A draft report will be prepared presenting the data, a description of the nature and extent of contamination at and emanating from the site, present and future impacts, environmental and human receptors.

TASK VI - DETAILED ANALYSIS OF ALTERNATIVES
(Third Phase Feasibility Study)

Subtask A - Evaluation of Alternatives

The cost and non-cost implications of each remedial action alternative will be described and will include the following elements:

- The intent of the remedial alternative in terms of source control, limiting contaminant migration or the effects of migration.
- Key features of the alternative including a technical description of the technologies that make up the alternative and whether it provides a single or multi-media solution.
- Aspects of the site problem that the alternative will or will not control.
- Control, storage, treatment and/or disposal requirements.
- Phasing requirements.
- Special engineering, safety, environmental, public health, and other considerations that affect the feasibility of each alternative.
- Legal requirements - existence of an administrative mechanism to implement the alternative.
- Short- and long-term operation, maintenance and monitoring requirements.

Subtask B - Comparison of Alternatives

This Subtask will compare alternatives using the full array of evaluation factors. The effectiveness criteria will include the degree to which the alternative protects human health and the environment. Where ARAR health based standards exist and are applicable, they will be used to establish the minimum level of protection required. Where such levels do not exist, HEA based risk assessments will be used to establish appropriate levels. Site specific measures may also address other implied health risks and impacts on environmental receptors. The reliability of the remedy, its possible replacement cost, and the degree to which the alternative reduces the mobility, toxicity or volume of contaminants will also be used in evaluating effectiveness.

Implementability will be evaluated in terms of the technical feasibility of the alternatives; the administrative feasibility of implementing the alternative; and the availability of specialized equipment or off-site capacity. Groundwater remedial actions will be evaluated in terms of groundwater use that may be impacted by site activities and the effectiveness and reliability of institutional controls. These may include legal restrictions on current and subsequent land uses and permitted activities and discharges pursuant to RCRA/CERCLA alternate concentration levels (ACL).

Cost evaluations used to compare alternatives will include short-term capital and operating costs and long-term operating and maintenance costs. The alternatives will be compared on the basis of present worth.

Subtask C - Remedial Preference: Meeting with the NYSDEC/Public Meeting

We will use the subtask A and B information to formulate a preferred alternative or approach which we will present with the FS for public comment at a meeting held by the NYSDEC.

TASK VII - SELECTION OF REMEDY

Subtask A - Establish a Preferred Remedy

This Subtask will assemble and describe a preferred remedy which will be recommended from among those alternatives that meet the following criteria:

- The alternative will protect human health and the environment and will satisfy the ARARs or health based levels established through risk assessments.

- Except under circumstances listed in SARA and the NCP, the alternative will attain all ARARs applicable to the site.

- The alternative will be cost-effective and will afford a level of protection that cannot be achieved by less costly methods provided such protection is warranted by the remedial objectives and/or SARA requirements.

- The alternative will utilize treatment technologies and permanant solutions to the maximum extent practicable as determined by technological feasibility, availability, cost-effectiveness and a reasonableness criteria.

The preferred remedy will reflect the following SARA defined preferences:

- For remedies that reduce the toxicity, mobility or volume of hazardous constituents.

- For remedies that minimize the requirement for long-term management of residuals.

An alternative that is preferred, but does not meet the Federal or New York public health or environmental ARARs will be selected when:

- The alternative is an interim remedy that will be part of a more comprehensive final remedy that will meet the Federal and New York ARARs.

- Compliance with the ARAR will result in a greater risk to human health and the environment than alternative options.

- Compliance with the requirements is technically impractical.

- The alternative will attain a standard of performance that is equivalent to that required under the otherwise applicable standards, requirements or limitations through the use of another method or approach.

- It is evident that the NYSDEC has not consistently applied similar requirements in similar situations.

The evaluation of alternatives to select the appropriate remedy will meet the requirements and preferences established in SARA and the NCP, and will represent the best achievable remedial balance across all evaluation criteria. The detailed analysis of the remedial alternatives and the preferred remedy will be described in a draft FS report.

Subtask B - Conceptual Plan

We will design a preliminary conceptual plan to implement the chosen alternative and we will determine whether the selected remedial alternative can be feasibly constructed.

All draft RI/FS report sections will be combined into a single draft report. The draft RI/FS will be finalized to include the NYSDEC and public comments. Eder Associates will review and provide imput as requested to the Record of Decision and the Responsiveness Summary prepared by the NYSDEC for the Schreck's Scrapyard.

Subtask C - Community Relations

We will discuss the technical aspects of the Remedial Investigation and Feasibility Study at a public informational meeting held by the NYSDEC.

SCOPE OF WORK

TASK I Scope The Remedial Investigation and Feasibility Study

SUBTASK A - Existing Data Review
SUBTASK B - Work Plan
SUBTASK C - Meeting with NYSDEC/Public Meeting

TASK II Site Characterization/Remedial Investigation

SUBTASK A^1 - Field Investigation
SUBTASK A^2 - Data Evaluation and Draft RI Report
SUBTASK B - Redefine Study Area Boundaries
SUBTASK C - Applicable or Relevant and Appropriate Requirements
SUBTASK D - Health and Environmental Risk Assessment

TASK III Development of Alternatives (First Phase Feasibility Study)

SUBTASK A - Operable Unit Determination
SUBTASK B - Identify Potential Remedial Alternatives
SUBTASK C - Community Relations

TASK IV Initial Screening of Alternatives

SUBTASK A - Initial Screening of Alternatives
SUBTASK B - Evaluation of Guidance Criteria and Meeting With NYSDEC

TASK V Second Phase Remedial Investigation

SUBTASK A - Literature Search and Work Plan Development
SUBTASK B - Treatability Study and Data Evaluation
SUBTASK C - Secondary Field Work, Data Analysis and Report Preparation

TASK VI Detailed Analysis of Alternatives

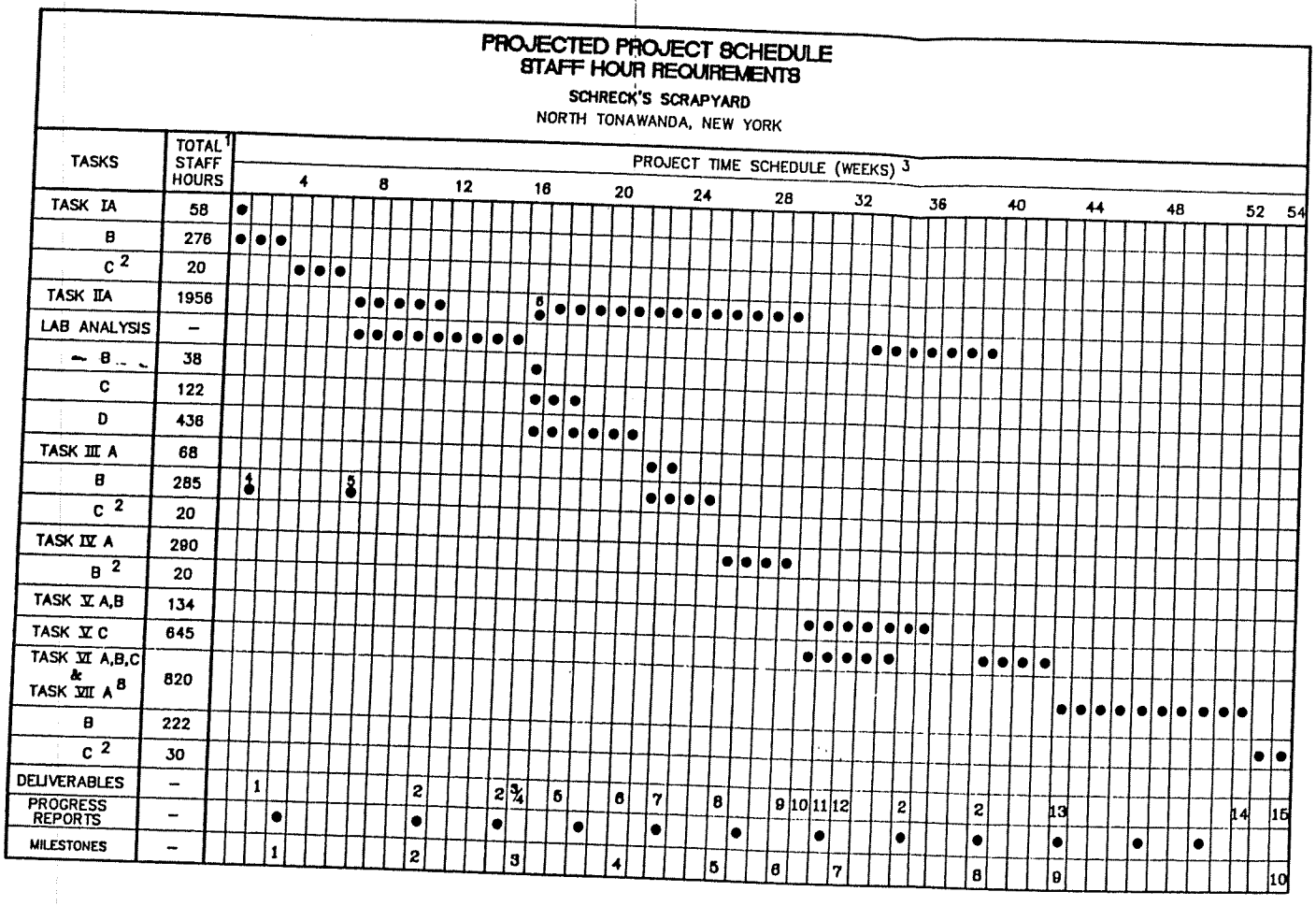
SUBTASK A - Detailed Evaluation of Alternatives
SUBTASK B - Comparison of Alternatives
SUBTASK C - Remedial Preferences

TASK VII Selection of Remedy

SUBTASK A - Establish Preferred Remedy
SUBTASK B - Conceptual Plan
SUBTASK C - Community Relations: Meeting With NYSDEC/Public Meeting

PROJECTED PROJECT SCHEDULE
STAFF HOUR REQUIREMENTS
SCHRECK'S SCRAPYARD
NORTH TONAWANDA, NEW YORK

TASKS	TOTAL[1] STAFF HOURS	PROJECT TIME SCHEDULE (WEEKS)[3]
TASK IA	58	
B	276	
C [2]	20	
TASK IIA	1956	
LAB ANALYSIS	–	
B	38	
C	122	
D	436	
TASK III A	68	
B	285	
C [2]	20	
TASK IV A	280	
B [2]	20	
TASK V A,B	134	
TASK V C	645	
TASK VI A,B,C & TASK VII A [8]	820	
B	222	
C [2]	30	
DELIVERABLES	–	
PROGRESS REPORTS	–	
MILESTONES	–	



REF. # PRGRARY39

DELIVERABLES–

1. Draft Work Plan, Quality Assurance/Quality Control Plan and the Health and Safety Plan
2. Raw Data Memoranda (e.g. Geophysical Data, Boring Logs, Analytical Data)
3. Memorandum Identifying ARAR's
4. Health and Environmental Risk Assessment (HEA) Work Plan
5. ARAR Compliance Section of Draft Remedial Investigation (RI) Report
6. HEA Section of the Draft RI Report
7. Operable Unit Recommendation Memorandum
8. Development of Alternatives (Phase I) Section of the Draft Feasibility Study (FS) Report
9. Draft First Phase RI Report
10. Initial Screening Section (Phase II) of Draft FS Report
11. Treatability Study Work Plan
12. Draft Work Plan & Amended QAPP & HASP
13. Task V Section of Draft RI Report
14. Detailed Analysis of Alternatives (Third Phase FS) and Selection of Remedy Section of Draft FS Report
15. Conceptual Design Section of Draft FS Report. All Draft RI and FS Sections will be combined into one Draft Report. The Draft RI/FS will be finalized to include New York State Department of Environmental Conservation and public comments

NOTES–

1. Total Eder Associates Staff Hours Breakdown per Task is in Appendix C.
2. Public meeting or Consultant/NYSDEC meeting per NYSDEC schedule.
3. Schedule will expand to allow time for actual laboratory analysis, NYSDEC reviews and for additional field work as required
4. Review of potential technologies will be conducted during work plan development to guide the field work
5. Tasks II and III are conducted concurrently to allow iterative feedback between tasks
6. Evaluate data and prepare Draft RI Report (Week 13–26)
7. Includes Detailed Analysis of Alternatives and Selection of Appropriate Remedy.

MILESTONES

1. Acceptance of Work Plan, Quality Assurance/Quality Control QA/QC Plan and HASP.
2. Submittal of the raw boring logs and the geophysical data.
3. NYSDEC QA/QC acceptance of the laboratory data.
4. Acceptance of the Health and Environmental Risk Assessment Report.
5. Acceptance of the first phase RI/FS Summary Report.
6. Acceptance of the Summary Report of the Initial Screening of Alternative and the proposed Second Phase RI/FS.
7. Acceptance of the Post Screening Field Investigations Summary report.
8. Acceptance of the Detailed Analysis of Alternatives Report with a selected remedy.
9. Acceptance of the draft RI/FS Report.
10. Acceptance of the final RI/FS Report with incorporated public comment.

Index of Acronyms and Abbreviations

AA	Atomic Absorption
ACL	Alternate Control Levels
API	American Petroleum Institution
ARAR's	Applicable Relevant Appropriate Requirements
B.E.S.T.	Basic Extractive Sludge Treatment
CERCLA	Comprehensive Environmental Response, Compensation & Liability Act
CFR	Code of Federal Registrar
CLP	Contract Laboratory Protocol
DEC	Department of Environmental Conservation
EA	Eder Associates Consulting Engineers, P.C.
FS	Feasibility Study
FY	Fiscal Year
GCR	Galson Corporation Research
GPR	Ground Penetrating Radar
HASP	Health and Safety Plan
HEA	Health & Endangerment Assessments
HRS	Hazardous Ranking Study
HSA	Hollow Stemmed Auger
HSL	Hazardous Substance List
ICP	Inductively Coupled Plazma
KF	Karl Fisher
KPEG	Potassium Polyethylene Glyolate (process)
MBE	Minority Business Enterprise
NCP	National Contingency Plan
NYCRR	New York Code of Rules & Regulations
NYSDECOAA	New York State Department of Environmental Conservation Office of Affirmative Action

NSPE	New York State Professional Engineers
OVA	Organic Vapor Analyzer
OSHA	Occupational Safety & Health Act
OSWER	Office of Solid Waste & Emergency Response
PCB	Polychlorinated Biphenyl
PLS	Professional Licensed Surveyor
PVC	Polyvinyl Chloride
QAPP	Quality Assurance Program Plan
QA/QC	Quality Assurance/Quality Control
RCRA	Resourse Conservation & Recovery Act
RI/FS	Remedial Investigation/Feasibility Study
RFP	Request for Proposal
SARA	Superfund Amendment & Reauthorization Act
TCDD	tetra chloro dibenzo dioxin
TCL	Target Compound List
TOC	Total Organic Carbon
USEPA	United States Environmental Protection Agency
VOA	Volatile Organic Analysis
WBE	Women's Business Enterprise
X*TRAX	Thermal Separation Extraction