

Corrective Action Report

Location:

Former Roblin Steel Site
320 South Roberts Road, Dunkirk, New York
NYSDEC Site No. B00173-9

Prepared for:

Chautauqua County Department of Public Facilities
454 North Work Street
Falconer, New York 14733

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Appendix 6	Cover System Thickness Survey
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1.0 INTRODUCTION

This Corrective Action Report was prepared on behalf of Chautauqua County by LaBella Associates, D.P.C. (LaBella) to summarize and document corrective measures implemented at the Former Roblin Steel Site (Site No. B00173-9) in 2015-2017. The corrective measures were undertaken in general conformance with the Corrective Action Work Plan (CAWP) developed for the Site and approved by the New York State Department of Environmental Conservation (NYSDEC) in April 2015. These corrective measures were required to address non-compliance issues associated with the placement of uncharacterized soil/fill on the Site and subsequent impacts to the engineered soil cover system at the Site that occurred during the removal of the aforementioned soil/fill. The actions described herein have effectively brought the Site into compliance with the requirements for the permanent engineering controls established in the approved Site Management Plan (SMP).

2.0 SITE LOCATION AND BACKGROUND

The Site is located at 320 South Roberts Road in the City of Dunkirk, New York and occupies approximately 12 acres of an inactive industrial park (See Figure 1). The Millennium Parkway, constructed in 2014, now transects the eastern portion of the Site in a northeast-southwest direction. As a result, a portion of the Site is located east of the new roadway and is separated from the remainder of the Site. Figure 2 illustrates the current configuration of the Site, while a boundary survey of the Site is also included within the Figures Section of this report.

The Site is located in an area zoned for industrial use. A mixture of commercial, industrial and residential properties comprise the land use in the Site's vicinity. The Site is bounded to the north by an active CSX rail yard; to the east by active Norfolk Southern railroad tracks; to the south by the former Alumax extrusions property; and to the west by the former Edgewood property. Residential properties are located to the northwest and south of the Site beyond the adjoining properties.

In 1910, the Site was developed as part of a larger industrial complex operated by the American Locomotive Company (ALCO). The Site was later used for steel reclamation; however, operations ceased in 1987. Following this closure, salvage operations dismantled and partially demolished a majority of the Site structures throughout the late 1980s and early 1990s. Since that time, the Site has been vacant.

Following acquisition of the Site by Chautauqua County in December 2001, the site was investigated and remediated pursuant to the State Assistance Contract (SAC) No. C302808 executed on December 12, 2005 between the County and NYSDEC. The remedial activities were completed under the Environmental Restoration Program (ERP) component of Title 5 of the Clean Water/Clean Air Bond Act of 1996, which was administered by the NYSDEC. The remediation of the site was completed in September 2010, and rendered the site suitable for commercial or industrial use.

The remedial efforts included the placement of a clean soil cover system across the site and the development of a SMP to manage the remaining contamination at the Site in perpetuity or until extinguishment of the Environmental Easement that was placed on the Site, in accordance with Environmental Conservation Law (ECL) Article 71, Title 36.

In May 2013, the Millennium Parkway construction project was initiated. The alignment of the new roadway passes through the Site. The soil cover system established as part of the remediation at the Site was disturbed in conjunction with the construction of the new Millennium Parkway Talcott Street Extension (Millennium Parkway) project in Summer/Fall 2014. Disturbance of the soil cover was completed in accordance with the provisions of the Excavation Work Plan (EWP) of the SMP. The cover system was restored by the end of 2014 in accordance with the Record of Decision (ROD) and the SMP upon completion of the new roadway.

3.0 NON-COMPLIANCE

The following areas of non-compliance were identified at the Site during the annual inspection conducted in conjunction with the development of the 2014 Periodic Review Report for the Site, and were subsequently corrected pursuant to the NYSDEC-approved CAWP:

1. Excavation spoils generated from off-site sources during the construction of the Millennium Parkway in Summer/Fall 2014 were stockpiled on the western portion of the Site (See Figure 3). This material was not properly analyzed per NYSDEC DER-10 requirements prior to its placement at the Site; therefore, the Site was not in compliance with the SMP at that time; and
2. The stockpile was not in compliance with the Master Erosion Control Plan (MECP) as the pile crossed the western Site boundary and extended onto the west adjoining property (known as the Edgewood Property). Per the MECP, no stockpiled material is permitted within 50 feet of the Site parcel boundaries.

4.0 CORRECTIVE MEASURES

4.1 Stockpile Characterization

The material in the stockpile was characterized pursuant to the CAWP and the ensuing results were submitted to the NYSDEC by Chautauqua County on March 24, 2016 in the form of a Stockpile Characterization Report (Appendix 1). Based on the analytical data generated for the stockpiled material, NYSDEC mandated the removal of all of the stockpiled material from the Site and adjacent Edgewood property. This requirement was conveyed by NYSDEC in a letter dated April 27, 2016, which called for the disposal of the stockpiled material at an approved waste disposal facility.

4.2 Waste Stream Profiling/Approval

In a letter dated July 26, 2016, the NYSDEC approved the off-site transport and disposal of the stockpiled material at the Chautauqua County Landfill (Site No. 07152). Subsequently, the Chautauqua County Landfill accepted and approved a permit application for the disposal of the material at their facility on July 27, 2016. Refer to Appendix 2 for waste stream profiling/approval documentation.

4.3 Stockpile Removal

From August 1-18, 2016, a majority of the stockpiled material was transported off-site by D&H Excavating, Inc. (D&H) to the Chautauqua County landfill. LaBella was on-site during these timeframes to conduct air monitoring during excavation and loading operations. On August 18, 2016, the NYSDEC
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required the termination of load-out activities at the Site due to excessive tracking of soil onto public roads by trucks exiting the Site destined for the landfill. At NYSDEC's request, a Truck Tracking Prevention & Control Plan (TTPCP) was developed and submitted on September 15, 2016 to address this issue. This plan received NYSDEC approval and load-out operations were resumed and completed on October 6, 2016. Refer to Appendix 3 for stockpile removal field documentation.

4.4 Transport and Disposal Records

Stockpile removal activities resulted in the transport of approximately 29,788 tons of C&D debris and soil to the Chautauqua County landfill by D&H. Refer to Appendix 4 for transport and disposal records including waste manifests and tonnage tickets.

4.5 Air Monitoring

As indicated above, LaBella conducted air monitoring throughout the course of stockpile removal activities. Three air monitors, one upwind and two downwind, were positioned proximate the remaining stockpile each day. Test data reports were completed each day and are included in Appendix 5. Based upon the results, no exceedances of NYSDEC or New York State Department of Health guidance thresholds were identified.

4.6 Cover System Evaluation

4.6.1 Thickness Survey

Following completion of the stockpile removal, KHEOPS was retained by the County to conduct a survey to determine the thickness of the Site soil cover within the former stockpile footprint. The KHEOPS survey compared ground surface elevations within the former stockpile footprint with the elevations of the base of the demarcation layer installed during the remediation of the Site in 2010. The difference between these elevations represented the thickness of the cover system. Based upon the results of the survey, it was determined that the cover system thickness within a majority of the former stockpile footprint was in compliance with the "one-foot of clean soil" thickness requirement identified within the SMP. However, according to the survey, the cover system thickness along the northwestern perimeter of the Site, in an area that encompassed approximately 0.7 acres, was not in compliance with this thickness requirement. This survey is presented in Appendix 6 and shows the approximate limits of the aforementioned 0.7-acre area where the cover system thickness had been denuded to less than the required cover system thickness of one foot. The corresponding repair of the cover system in this area through the placement of DER-10 compliant, clean soil is described in Section 4.7.

4.6.2 Confirmatory Sampling and Analysis

Per the requirements of the CAWP, confirmatory sampling and analysis were required following removal of the stockpile material. Consequently, The County retained C&S Companies (C&S) to obtain eight surface soil samples within the limits of the former stockpile area for chemical analysis. The soil samples were submitted for laboratory analysis of target compound list (TCL) SVOCs and target analyte list (TAL) metals. Based upon the analytical results, it was determined that all stockpiled soils had been properly removed from the Site and that the material remaining at the surface within the area of the former stockpile met the applicable NYSDEC Soil Cleanup Objectives (Part 375 Commercial and/or Industrial Use). A copy of the confirmatory sampling and analysis report is included as Appendix 7.

4.7 Cover System Repair

4.7.1 Source of Imported Cover Soil

The D&H mine located at 1400 Jones Road in Freedom, New York was identified as the intended source of virgin soil to be used to augment the cover system in the 0.7-acre area of denuded cover soil on the Site. Therefore, the County retained C&S to collect one soil sample from this mine for laboratory analysis of TCL VOCs, TLC SVOCs, TCL pesticides, polychlorinated biphenyls and TAL Metals to verify compliance with DER-10 limits for imported soil. Based upon the analytical results from this sample, it was determined that this source material was acceptable for use in augmenting the cover system. Appendix 7 also includes the analytical results for the virgin-source material.

4.7.2 Cover Soil Placement

On January 26 and 30, 2017, approximately 1,064 tons of virgin soil was delivered to the Site from the D&H mine identified above in Section 4.7.1. The virgin soil was roughly graded within the 0.7-acre area of the former stockpile footprint where the cover thickness was less than the one-foot thickness requirement. LaBella was on-site during delivery and grading activities to observe dust conditions and assure that the TTPCP was implemented properly. Refer to Appendix 8 for cover soil placement field documentation and bills of lading for the imported virgin soil.

4.7.3 Final Cover Survey and Inspection

Final grading activities were completed within the 0.7-acre cover repair area of the former stockpile footprint on February 27, 2017. Subsequently, on February 28, 2017, a final survey was conducted within this area of the former stockpile footprint and confirmed that the soil cover thickness in the area of the repair satisfies the thickness requirement established in the SMP. LaBella conducted a visual inspection of the final soil cover system on March 1, 2017 and determined that the cover system is intact and functioning as designed on the Site. Refer to Appendix 9 for the final cover system survey and associated field documentation. Lastly, Appendix 10 includes the completed Institutional and Engineering Controls Certification Form.

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FIGURES

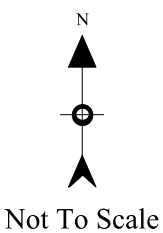
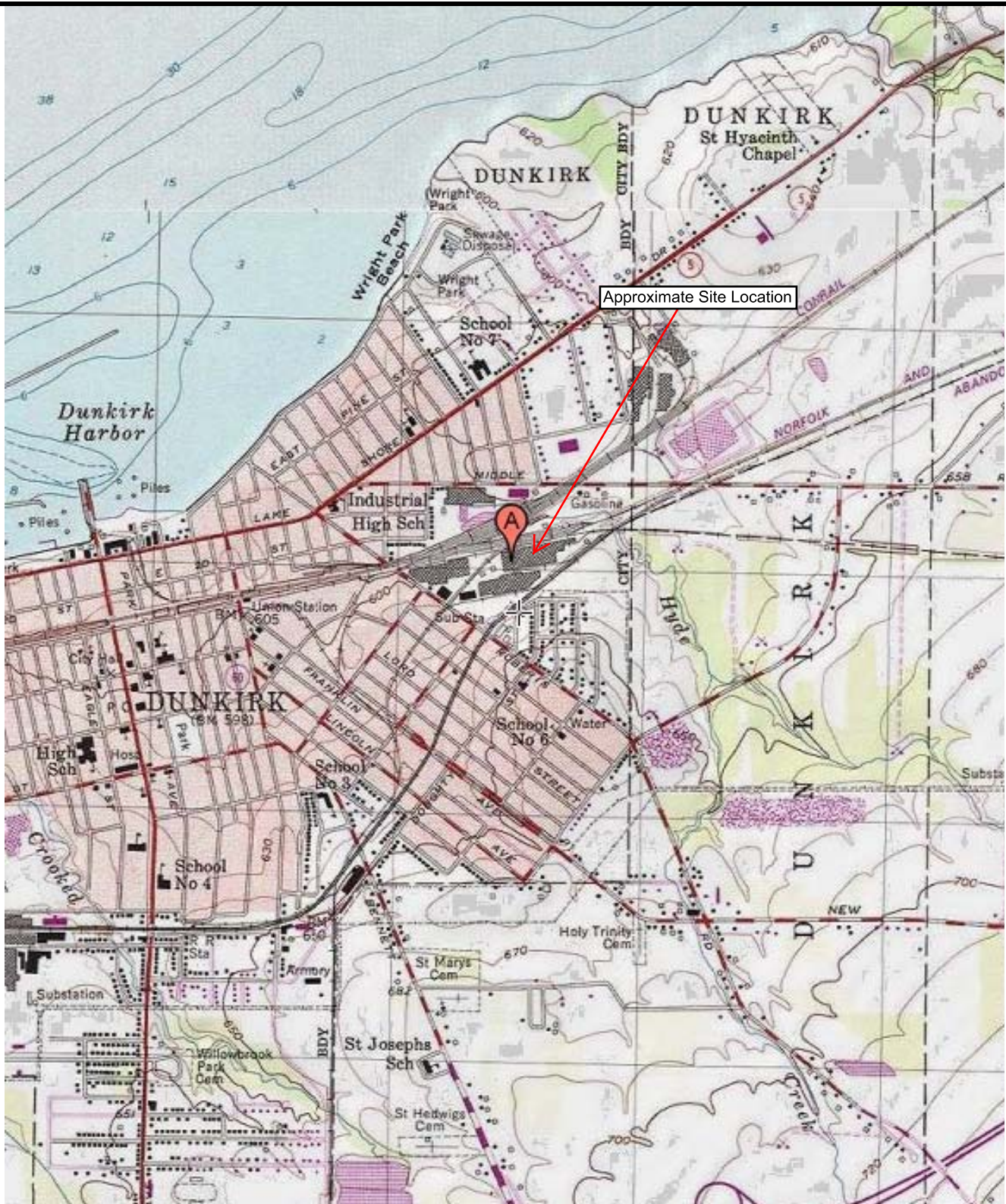


FIGURE 1 SITE LOCATION MAP

Former Roblin Steel Site
320 South Roberts Road
Dunkirk, New York

ABELLA

PROJECT NO. 2160146





FIGURE 3 SHEET NUMBER	CITY OF DUNKIRK NEW YORK	FIGURE 3 SHEET NUMBER	DESIGNED BY: TAP DRAWN BY: ATB CHECKED BY: OK DWG SCALE: Horiz: 1" = 60' Vert: 1" = 60'	DATE: MARCH 2017 JOB NO.: 2160146 DRAWING FILE NO.: FILE NAME:	SOCIAL: ORIGINAL DRAWINGS PROVIDED BY: HATCHER ARCHITECTURE ENGINEERING & SURVEY, INC.	REVISION DESCRIPTION DATE BY
	SITE PLAN FORMER ROBLIN STEEL SITE CITY OF DUNKIRK CHAUTAUQUA COUNTY		FIGURE 3 SHEET NUMBER			
	LEGEND --- APPROXIMATE PROPERTY LINES/PROJECT LIMITS --- APPROXIMATE BOUNDARY OF FORMER STOCKPILE		FIGURE 3 SHEET NUMBER			
	0 60 120 FT. 1" = 60'		FIGURE 3 SHEET NUMBER			

