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Work Plan



Interim Remedial Measure: MW-5 Brownfield Cleanup Program P&S Boyd Ave Site Solvay, New York

BCP Site # C734102

March 2008



WORK PLAN INTERIM REMEDIAL MEASURE: MW-5 BROWNFIELD CLEANUP PROGRAM P&S BOYD AVE SITE **SOLVAY, NEW YORK**

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Project No. N5005

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SECTION 1 – INTRODUCTION

This Work Plan describes an Interim Remedial Measure (IRM) that will be conducted at the Pass & Seymour (P&S) Boyd Avenue site, located at 50 Boyd Avenue in the village of Solvay, Onondaga County, New York. P&S is presently conducting a Remedial Investigation (RI) at the site in accordance with a Brownfield Cleanup Agreement (Site # C734102) with the New York State Department of Environmental Conservation (NYSDEC). The RI has determined the presence of light non-aqueous phase liquid (LNAPL) in monitoring well MW-5. The IRM will address the LNAPL that exists in MW-5.

MW-5 is one of 18 groundwater monitoring wells identified at the site that were installed prior to the RI. Because the previously-installed wells were not used for conducting the RI, they were targeted for decommissioning in October 2007, in accordance with an NYSDEC-approved well-decommissioning work plan.

Prior to decommissioning each of the previously existing monitoring wells, the depth of the wells and the depth to groundwater were measured. When these measurements were made for MW-5, several inches of a dark brown/black LNAPL was discovered. The New York State Spills Hotline was called upon discovery of the LNAPL, and Spill No. 0707863 was assigned to the site.

Because of the discovery of LNAPL, well MW-5 was not decommissioned. Instead, bailing was initiated to evaluate the volume of LNAPL present and it recoverability. Periodic bailing from October 2007 through January 2008 removed approximately 0.8 gallons of LNAPL along with approximately 25 gallons of groundwater, which has been contained in a 55-gallon drum at the site.

During each of the LNAPL bailing episodes at MW-5, the well was typically bailed dry after approximately 1 to 2 gallons. Field observations from the bailing program have determined that 1 to 2 inches of LNAPL typically returned to the well within 3 to 4 days.

The potential source of the LNAPL at MW-5 is not known. MW-5 is located in the western portion of the site, in the southern portion of what was historically a parking lot (Figure 1). No buildings, other structures, or operations are known to have occurred at its location. None of the RI monitoring wells in the western former parking lot area, nor

anywhere else at the site, contain LNAPL. RI monitoring wells in the western former parking lot have produced groundwater samples that contain low levels of organic compounds (below Class GA groundwater quality standards), but do not suggest the presence of a significant LNAPL source.

Based on RI findings, the LNAPL discovered in MW-5 appears to represent a discrete and localized area of contamination. It is therefore recommended that the LNAPL contamination be addressed as an IRM, to remove this discrete potential contamination source from the site.

This IRM Work Plan describes the objectives and approach of the IRM, consistent with New York State Department of Environmental Conservation (NYSDEC) BCP Guidance, and NYSDEC's DER-10 *Technical Guidance for Site Investigation and Remediation* (December 2002). The IRM will follow applicable provisions of the previously approved Remedial Investigation Work Plan (SWRNA, July 2005), including the Site Health and Safety Plan, Quality Assurance Project Plan, Citizen Participation Plan, and Community Air Monitoring Plan, as approved by NYSDEC.

SECTION 2 – IRM METHODS

This section describes the approach that will be taken to remove LNAPL and associated contamination from the site as an IRM. As previously noted, RI groundwater data suggest that the LNAPL in MW-5 is a localized occurrence, which should facilitate its removal by excavation.

If the IRM approach is determined to be impracticable, or if the completed IRM does not reach an acceptable end-point, remedial alternatives will be evaluated in the Remedial Work Plan, following completion of the RI, to address remaining issues related to LNAPL at MW-5.

2.1 - LNAPL CHARACTERIZATION

A sample of the LNAPL will be collected for analysis to determine its chemical composition. Compound-specific analysis will include volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs), and PCBs. In addition to reporting the compounds present in the LNAPL, the laboratory will also provide a forensic report that discusses the relative proportions of compounds present, and the probable derivation of the LNAPL (e.g. crude oil derivative such as gasoline or fuel oil vs. combustion derivatives such as tar- or asphalt-based product).

2.2 - CONTAMINANT EXCAVATION AND REMOVAL

The objective of the IRM is to identify and remove by excavation LNAPL and potential LNAPL sources near MW-5. LNAPL and contaminated groundwater encountered during excavation will be removed by vacuum (vac) truck. Soil containing LNAPL will be removed from the excavation and stockpiled for off-site disposal.

The total depth of MW-5 is approximately 21 feet below ground surface (bgs), and the depth to groundwater in MW-5 is approximately 12 to 13 feet bgs. The LNAPL exists on top of the water column. The IRM approach will be to excavate down to groundwater in the vicinity of MW-5, to remove LNAPL and associated soil contamination that may exist at and above the water table. By this approach it is estimated that the depth of the excavation will be approximately 15 (±) feet bgs.

Excavation will begin directly adjacent to well MW-5. (It is anticipated that MW-5 may be removed as soil is removed from the IRM excavation). Soil will be excavated down to groundwater, and the excavation will extend away from MW-5 based on field evidence of LNAPL contamination, or evidence of potential LNAPL sources as may be encountered.

The excavation will continue horizontally away from MW-5 based on visual, olfactory, or photoionization detector (PID) evidence of LNAPL in soil or groundwater, or to remove any structures or containers that may be discovered during excavation that are considered potential LNAPL sources (e.g. drums, tanks, pipes).

When the final limits of the excavation are reached, the edges of the excavation will be marked off and surveyed.

2.3 - CONFIRMATORY (END-POINT) SAMPLING

When evidence of LNAPL contamination and/or LNAPL sources are no longer apparent, the excavation will stop and confirmatory soil samples will be collected from the excavation sidewalls to ensure contaminated material has been removed to acceptable levels. Since the bottom of the excavation is expected to contact groundwater, no confirmatory soil sample is proposed from the bottom of the excavation.

The confirmatory soil samples will be analyzed for specific compounds based on the results of the LNAPL analysis. These compounds may include target compound list (TCL) volatile organic compounds (VOCs by EPA Method 8260), semivolatile organic compounds (SVOCs by EPA Method 8270), and/or PCBs (EPA Method 8082). Analyses will be performed by a New York State certified laboratory.

After the confirmatory soil samples are collected, the excavated area will be backfilled. Backfill will consist of either clean imported granular fill, or uncontaminated excavated soils that are approved by NYSDEC for use as backfill (per Section 2.4 below).

2.4 - WASTE DISPOSAL

All liquid (LNAPL and contaminated groundwater), contaminated soil, and any structures or buried debris removed from the excavation, will be hauled off site for disposal at permitted waste disposal facilities.

Soil that is removed from the excavation will be staged temporarily on site on plastic, and covered with plastic. Soil with evidence of contamination (based on visual, odor, and PID) will be segregated from soil with no evidence of contamination.

Stockpiled soil with evidence of contamination will be disposed off site, after samples are collected and analyzed for specific waste characterization parameters as required by the off-site disposal facility.

Stockpiled soil with no evidence of contamination may be taken off site for proper disposal, or used on site as excavation backfill, based on soil analytical results and as approved by NYSDEC. Soil samples will be collected from the uncontaminated stockpile at a frequency of one sample per 100 tons, and analyzed for target compound list (TCL) volatile organic compounds (VOCs), TCL semivolatile organic compounds (SVOCs), PCBs, and target analyte list (TAL) metals. If soil sample analytical results indicate that the soil meets Part 375 commercial soil cleanup objectives, it may be used as excavation backfill with NYSDEC approval. Otherwise, the soil will be taken off site for disposal.

SECTION 3 - IRM REPORT

Confirmatory soil samples will be collected to substantiate that the objective of the IRM has been achieved. The findings of the IRM will be presented in an IRM Report following completion of the work, to describe the nature and extent of LNAPL observed during excavation near MW-5, the estimated quantity of LNAPL and contaminated soil removed, and the results of confirmatory end-point samples and the locations from which they were collected. The following will be provided by the IRM Report:

- A description of the IRM activities, including the quantity of excavated soils, volume of LNAPL, surveyed dimensions of the excavation, and photographic documentation of source removal activities;
- Identification of the facility(ies) where the soils were disposed of, including the disposal bill of lading and manifests;
- A discussion of field observations during excavation activities;
- Summary tables of laboratory analytical results and a narrative discussion of the results; and
- Conclusions and recommendations regarding the need for further action, if any, relative to the LNAPL.

SECTION 4 – SCHEDULE

IRM field work can be scheduled to begin within two (2) weeks following NYSDEC approval of this IRM Work Plan. NYSDEC will be given at least 10 days notification prior to beginning work.

The estimated duration of the excavation, waste characterization, and backfilling is two (2) weeks.

The IRM Report will be completed within 30 days following the receipt of final disposal documents.

