



DAY ENVIRONMENTAL, INC.

ENVIRONMENTAL CONSULTANTS
AN AFFILIATE OF DAY ENGINEERING, P.C.

September 20, 2010

Charlotte B. Theobald
Environmental Engineer 1
New York State Department of Environmental Conservation
Division of Environmental Remediation, Region 8
6274 East Avon-Lima Road
Avon, New York 14414-9519

RE: Investigation Derived Waste Disposal: Letter Work Plan
NYSDEC Brownfield Cleanup Program Project
Genesee Marina, Inc.
118 Petten Street
Rochester, New York
Site #C828130

Dear Ms. Theobald:

The purpose of this letter work plan is to provide specific protocols for disposal of investigation derived waste (IDW) generated as part of the Genesee Marina, Inc. Brownfield Cleanup Project C828130 located at 118 Petten Street, Rochester New York ("the Site"). The work plan was requested by the New York State Department of Environmental Conservation (NYSDEC) in correspondence to Alan Knauf of Knauf Shaw, LLP dated August 20, 2010. The IDW was generated during the Remedial Investigation (RI) conducted at the Site. A detailed summary of the RI findings, recommendations, and conclusions are provided in the draft RI report that was submitted to the NYSDEC in February 2010.

1.0 BACKGROUND

The Site is located in an urban setting (residential and commercial) and consists of approximately 25 acres with an estimated 2,500 feet of frontage along the western shore of the Genesee River at the Port of Rochester (refer to Figure 1). The Site is improved with a marina. The Site has been used as a marina since 1947 and includes multiple buildings, many of which are in poor condition, and more than 200 boat slips, some of which are unusable. The Site also contains offices, a shop, and a parking area for the *Spirit of Rochester* cruise boat, which ceased operation in 2003. There are two boat ramps located along the riverfront. The Site contains asphalt and gravel roadways and parking areas, woods, and both federally and NYSDEC regulated wetlands. The Site was used for the disposal of construction and demolition debris from the 1960's until recently. The New York Central Railroad used a portion of the Site as a railroad yard. Railroad spurs traversed the northern portion of the Site from approximately 1918 to 1978. The railroad spur along the western boundary is active.

IDW generated during the RI was contained in twenty 55-gallon drums located near the southeastern corner of Building 6 in the central portion of the Site (refer to Figure 2). The IDW area is approximately 17' by 8' in size. The drums contain a variety of wastes, including drill cuttings (soil), well development water, personal protective equipment (PPE), and polyethylene (i.e., from the decontamination pad, etc.). The NYSDEC letter dated August 20, 2010 indicated that the drums must be disposed in accordance with applicable regulations, and that a work plan must be submitted to the NYSDEC that describes additional investigation and sampling activities to be conducted in the IDW area, within 30 days of the date of the letter.

As discussed with the NYSDEC on September 13, 2010, this letter work plan is being submitted to the NYSDEC to fulfill the requirement of submitting a work plan by September 20, 2010 for NYSDEC review. The NYSDEC representatives indicated that a letter work plan would be sufficient that referenced protocols and procedures already present in the RI Work Plan dated June 29, 2007 (RI Work Plan) and the NYSDEC Division of Environmental Remediation (DER) Guidance Document DER-10. Also, the NYSDEC representatives indicated that additional time would be allowed to arrange for the disposal of the IDW.

In addition, as discussed with the NYSDEC on September 13, 2010, soils that are located beneath the drums will be excavated and disposed as part of the IDW disposal activities in lieu of conducting additional investigation and sampling activities in the IDW area.

2.0 SCOPE OF WORK

The scope of work and sequence of events that will be conducted as part of the IDW disposal activities are presented below.

- As already discussed with the NYSDEC, the drums were labeled on September 15, 2010 as required by the NYSDEC August 20th letter. The drums were labeled as a Non-Hazardous Waste.
- In order to prepare the drums of IDW for disposal, any free liquids in the drums were pumped and consolidated into two new 55-gallon drums on September 17, 2010. The NYSDEC was verbally notified that this work would be conducted.
- As stated in Sections 6.1.2.6, 6.1.2.7, and 6.3 of the RI Work Plan, the IDW is being characterized for disposal in accordance with applicable regulations. A Waste Disposal Profile Form is currently being prepared for submittal to Waste Management, Inc. in order to obtain approval for disposal of the soil, PPE and polyethylene at the Mill Seat Landfill located in the Town of Riga, New York. This landfill is a NYSDEC Part 360 permitted solid waste landfill. Approval is also being obtained for disposal at the Mill Seat Landfill of the soil that will be excavated from beneath the drums. The waste characterization of the IDW, and soil that will be excavated from beneath the drums, is being conducted based on knowledge of the waste using data generated during the RI.
- Once approval is received for disposal at the Mill Seat Landfill, a date for the removal of waste from the Site will be established. As required by the NYSDEC August 20th letter, the NYSDEC will be provided a 7 day notice so that the NYSDEC can be on-site during the removal activities.
- Prior to the actual removal date, a roll off container will be delivered to the Site by a NYSDEC Part 364 permitted hauler.
- On the day of removal activities, the drums will be moved and temporarily staged on plywood that is placed over a double layer of 6-mil polyethylene. The soils from beneath the drums will then be excavated to a depth of one foot. The excavation will be approximately 17' x 8' x 1' in size. The excavated soils will be placed in the roll off container. Based on the volume of soils to be excavated, it is anticipated that about 7 to 9 tons of soil will be generated. During the excavation activities, field screening will be conducted with a photoionization detector (PID). Additional soil removal may be required if field evidence of contamination, such as staining, odors, or elevated PID readings are encountered in the resulting excavation. In addition, potential fugitive dust emissions will be monitored utilizing a particulate dust meter in accordance with the generic community air monitoring plan listed in DER-10 Appendix 1A dated May 2010.
- Upon completion of the excavation activities, the drums containing soil, PPE, and polyethylene will be emptied into the roll off container. Any free liquid will be absorbed using the excavated soil already present in the roll off, and Speedy Dry, cellulose, or some other absorbent material, as needed. The empty drums will be crushed and also placed into the roll off container for disposal.

The plywood and 6-mil polyethylene upon which the drums were temporarily staged will also be placed in the dumpster. As the wastes are being placed into the roll off container, field screening will be conducted with a PID, and fugitive dust emissions will be monitored as described above.

- Upon completion of placing wastes into the roll off, a paint filter test(s) will be conducted on the wastes to ensure that it does not contain free liquid that would prohibit the wastes from being disposed at the Mill Seat Landfill. If the waste fails the paint filter test, additional absorbent material will be added to the wastes. Upon receipt of an acceptable paint filter test, the roll off will be transported to the Mill Seat Landfill by a 6 NYCRR Part 364 permitted hauler, and the wastes will be disposed in accordance with applicable regulations. In addition, the excavated area will be re-graded using Site soil to prevent surface water ponding, and grass seed will be applied to the graded area.
- Also, on the day that the removal activities occur, the two new drums that were generated on September 17, 2010 that contain the free liquids will be addressed. The liquid from these drums will be pumped through a portable filtration and carbon treatment system. The portable treatment system will consist of a chemical resistant centrifugal pump connected to a 50-micron filter, a five micron filter and two activated carbon units connected in series. The pump will be placed in the drums and it will pump water from the drums at a flow rate of approximately one gallon per minute. The filtration cartridges have dimensions of approximately 2 5/8" in diameter by 9 3/4" long. The activated carbon columns are approximately 4" in diameter and 60" high. The carbon columns hold approximately 21 pounds of carbon and can remove at least 2 pounds of VOCs. Effluent from the treatment system will be discharged to the ground in the vegetated area near where the drums are located. It is anticipated that about 100 gallons of treated water will be discharged. The two drums will be rinsed and the drums will be reused for other purposes. The rinse water will also be contained and pumped through the treatment system.
- The work described will be conducted in accordance with pertinent sections of the Health & Safety Plan dated June 29, 2007 that was used during the RI.

3.0 SCHEDULE

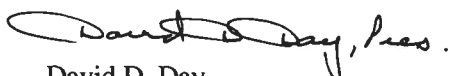
It is anticipated that the work described in Section 2.0 can be completed within one to three weeks of NYSDEC approval of this work plan. This schedule is dependent on receiving approval from Waste Management, Inc. for the disposal of the wastes at the Mill Seat Landfill without the need to conduct any additional sampling for characterization purposes, and the desire of NYSDEC to receive 7 days advance notice. Also, the disposal activities are dependent on being conducted on a day that has dry weather.

4.0 REPORTING

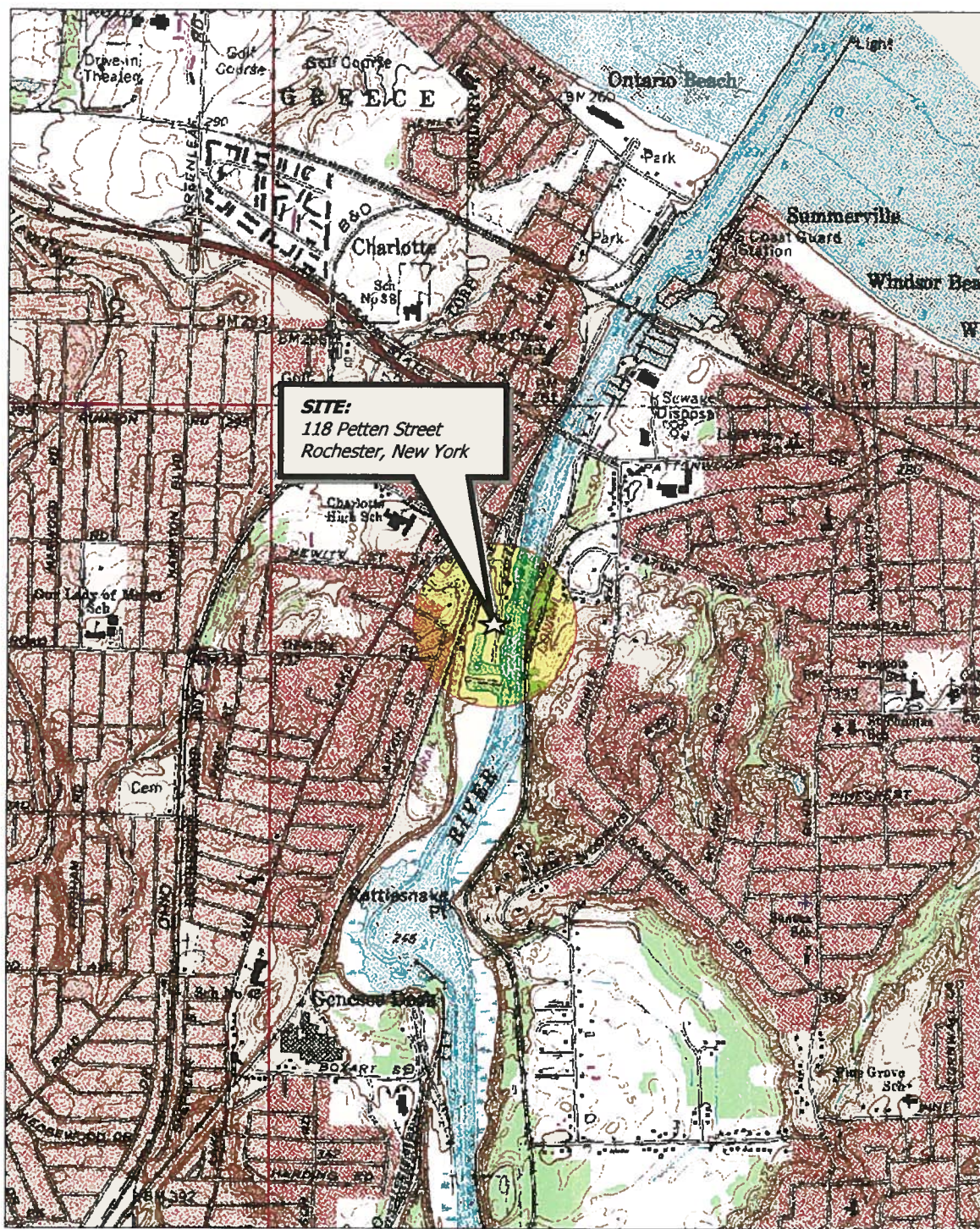
A letter report documenting the IDW disposal effort including field observations, monitoring data, and waste disposal documentation will be submitted to the NYSDEC within 30 days of completing the IDW removal activities.

If there are any questions, please contact this office.

Very truly yours,
Day Environmental, Inc.



David D. Day
Principal



3-D TopoQuads Copyright © 1999 DeLorme Yarmouth, ME 04096 Source Data: USGS 1:50,000 Scale: 1:19,200 Detail: 14-0 Datum: WGS84

Drawing Produced From: 3-D TopoQuads, DeLorme Map Co., referencing USGS quad maps Rochester East (NY) 1995 and Rochester West (NY) 1995. Site Lat/Long: N43° 14.57' – W77° 36.87'

DATE
9/15/2010

DRAWN BY
RJM

SCALE
1" = 2000'



DAY ENVIRONMENTAL, INC.
ENVIRONMENTAL CONSULTANTS
ROCHESTER, NEW YORK 14614-1008
NEW YORK, NEW YORK 10165-1617

PROJECT TITLE

118 PETTEN STREET
ROCHESTER, NEW YORK

IDW REMOVAL WORK PLAN

DRAWING TITLE

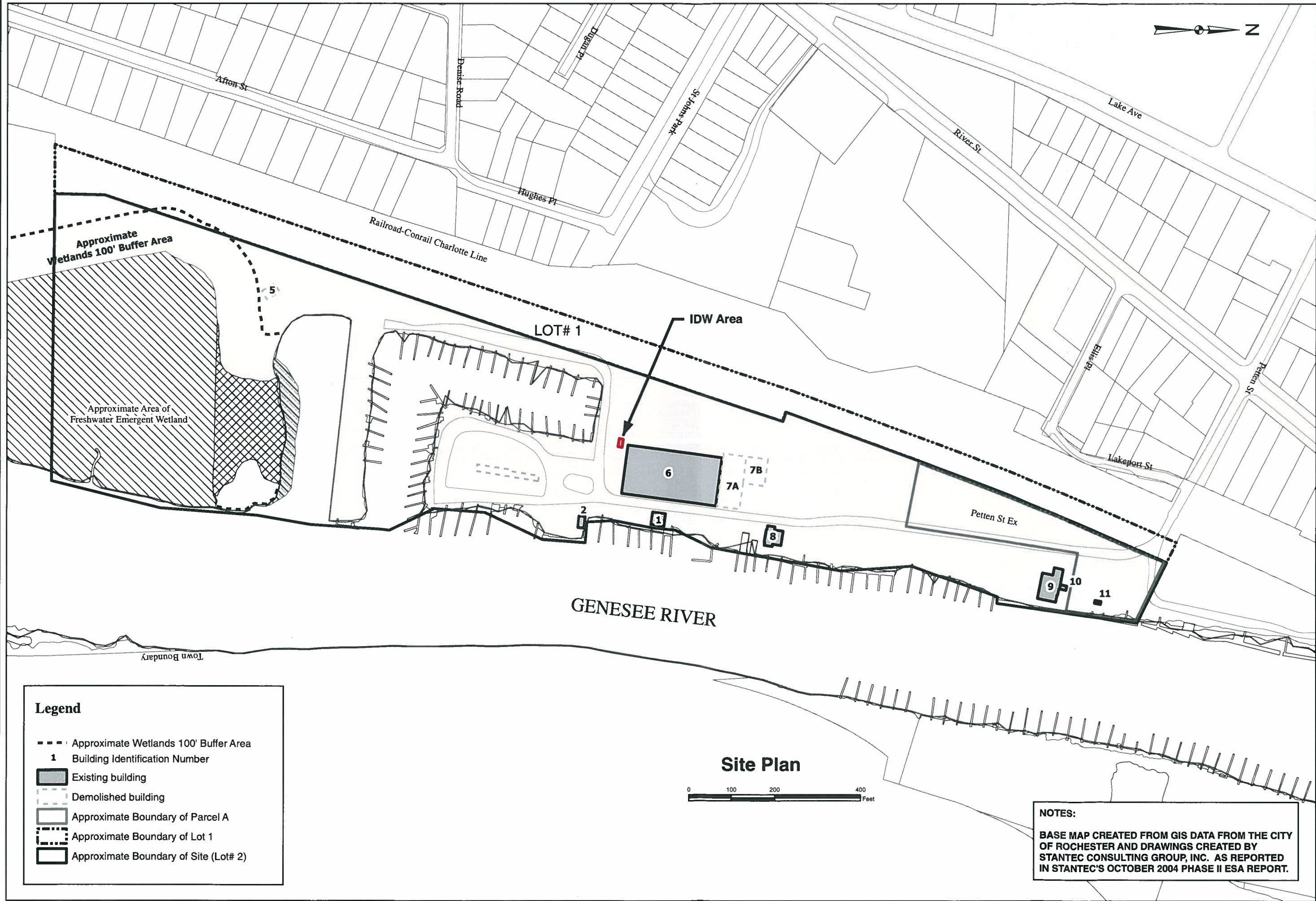
PROJECT LOCUS MAP

PROJECT NO.

3903S-06

FIGURE 1

C:\GIS\GIS Mapping\3903S-06\GenMap\3903S-14-2.mxd



DESIGNED BY	DATE	DRAWN BY	DATE	CHECKED BY	DATE	APPROVED BY	DATE	SCALE	AS NOTED	DATE
DUG	06-2008	CPS	09-2009	RJM	09-2009	DDD	09-2009			09-15-2010

DAY ENVIRONMENTAL, INC.	DRAWING ALTERATION
THIS DOCUMENT MAY NOT BE ALTERED WITHOUT THE PERMISSION OF DAY ENVIRONMENTAL, INC.	

NO.	REVISIONS	DATE	BY

day
DAY ENVIRONMENTAL, INC.
ENVIRONMENTAL CONSULTANTS
ROCHESTER, NEW YORK 14614-1008
NEW YORK, NEW YORK 10161-1617

PROJECT TITLE
GENESEE MARINA
118 PETTEN STREET
ROCHESTER, NEW YORK

DRAWING TITLE
IDW REMOVAL WORK PLAN
SITE PLAN WITH IDW AREA

PROJECT NO.:
3903S-06

FIGURE 2