SITE RE-GRADING PLAN

for the

BROWNFIELD CLEANUP PROGRAM

at the

FORMER GENEVA FOUNDRY SITE
OPERABLE UNITS 1 AND 2
Jackson Street
City of Geneva, Ontario County, New York
BCP Site No. C835027

Prepared for:

CITY OF GENEVA
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Project No. 2015003

July 2017

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ATTACHMENTS

1.0 INTRODUCTION

The City of Geneva (City) owns the Former Geneva Foundry Site located on Jackson Street in the City of Geneva, Ontario County, New York. Site remediation is being performed through the New York State Brownfield Cleanup Program (BCP) under Site No. C835027.

A Remedial Action Work Plan (RAWP) was approved by the New York State Department of Environmental Conservation (DEC) that includes the excavation of four distinct areas, which are to be overseen by an onsite qualified environmental professional. Confirmation samples will be collected in accordance with the RAWP and analytical results submitted to the DEC for approval.

The DEC supervised the demolition of former onsite buildings in 2005, leaving concrete foundation walls and floor slabs. Refer to *Figure 1 – Site Plan* for additional information. The City proposes to improve the property's marketability by removing the exposed concrete foundation walls and floor slabs and re-grading the site, as shown on *Figure 2 – Site Re-Grading Plan*. The City plans to implement the re-grading plan following completion of the RAWP and upon written authorization from DEC to proceed. The proposed re-grading plan involves moving existing onsite soil only, and no removal or importation of soil is anticipated. *In-situ* soil sampling will be performed prior to removal of the existing concrete slabs to document that the top 2 feet of finished grade will comply with the soil cover requirements in the January 2017 Record of Decision.

2.0 NOTIFICATION

The City will notify the DEC DER Project Manager of the intent to implement the re-grading plan following receipt of the analytical results from the soil screening samples. Refer to the *List of Site Contacts* for a full listing of site-related contact information.

Notification will include:

- The planned date to implement the re-grading plan. The proposed re-grading will take place following the soil cover installation completed as part of the remedial action and will not impact an engineering control.

- Analytical results from the soil screening process.

- A schedule for the work, detailing the start and completion of all intrusive work.

- A summary of the applicable components of the site re-grading plan.

- A statement confirming the work will be performed in compliance with the soil re-grading plan and Code of Federal Regulations, Title 29 (29 CFR) 1910.120 *Hazardous Waste Operations and Emergency Response*.

- An electronic copy of the Health and Safety Plan (HASP) (RAWP Appendix C).

- Identification of disposal facilities for potential waste streams.

- Identification of sources of any anticipated backfill, along with all required chemical testing results.

3.0 GROUNDWATER MONITORING WELL DECOMMISSIONING

Four 2-inch diameter monitoring wells installed to a depth of 15 feet (MW-1, MW-2, MW-5 and MW-6) and two 1-inch diameter monitoring wells installed to a depth of 9 feet (MW-3 and MW-4) will be decommissioned in general conformance with the New York State Department of Environmental Conservation (DEC) *Groundwater Monitoring Well Decommissioning Policy*.[1] Refer to the attached *Figure 1 – Site Plan* for additional information.

[1]DEC Commissioner Policy, *CP-43: Groundwater Monitoring Well Decommissioning Policy*, issued November 3, 2009.

The monitoring well decommissioning work will consist of the following tasks:

- Coordinate public utility clearance with Dig Safely New York and private subsurface utility clearance with the owner.

- At each monitoring well location:

    - Remove protective riser with concrete pad and excavate materials to 6 inches below grade.

    - Remove well screen and riser pipe, and grout borehole with cement/Bentonite to 6 inches from grade using the punch pull and grouting method. If the casing fractures, such that the well screen is not removed, over-drill the well to its full depth and grout to ground surface or grout the well in-place.

    - Compact with gravel from 6 inches to grade.

- Submit a Groundwater Well Decommissioning Report to the DEC within four to six weeks following completion of the well decommissioning field work.

4.0 SOIL SCREENING

Visual, olfactory and instrument-based (e.g. photoionization detection meter) soil screening will be performed by a qualified environmental professional during all soil disturbances, such as removals of foundations and slabs, and re-grading. Prior to removing the concrete slabs, soil samples will be collected for analysis from the areas that will comprise the top 2 feet of finished grade to assess whether the soil cover requirements will be met. Soil samples will be collected in accordance with the recommended sampling frequencies noted in *Table 5.4(e)10 of DER-10/ Technical Guidance for Site Investigation and Remediation (DER-10)*, based on the planned reuse of soils as cover.

An evaluation will be performed if the soil samples collected during the screening procedures indicate the presence of soils exceeding SCOs for restricted residential use. The evaluation will determine whether the soils in question can be incorporated into the re-grading plan in an area where they will be covered with an appropriate soil cover or whether the materials should be excavated and transported offsite for disposal in accordance with all local, State and Federal regulations.

5.0 SOIL MANAGEMENT

The City and its contractors are responsible for the safe execution of all invasive and other work performed under this plan. A qualified environmental professional, or person under their supervision, will oversee all invasive work and management of exposed soils.

The presence of onsite utilities and easements will be investigated by the City in consultation with a qualified environmental professional to determine whether utilities or easements pose a risk or impediment to the proposed re-grading plan.

Graders and/or bulldozers will be used to re-grade the underlying soils to the new topography detailed on Figure 2 following removal of concrete foundations and slabs. Soil stockpiles are not anticipated. As previously noted, soil samples will be collected at appropriate depths and at a frequency consistent with the requirements of Section 5.4(e) of DER-10 to document that site soils can be reused for soil cover. These samples will be collected from below the existing concrete slabs prior to their removal.

A truck and equipment wash will be operated onsite. A qualified environmental professional will be responsible for ensuring all outbound trucks and equipment are washed before leaving the site until activities performed under this section are complete. Truck and equipment wash waters will be collected and properly disposed of offsite.

Locations where vehicles enter or exit the site shall be inspected daily for evidence of offsite soil tracking. A qualified environmental professional will be responsible for ensuring all egress

points for truck and equipment transport from the site are clean of dirt and other materials derived from the site during intrusive excavation activities. Cleaning of the adjacent streets will be performed, as needed, to maintain a clean condition with respect to site-derived materials.

Transport of soils offsite is not anticipated during the proposed re-grading. If a situation occurs where soil removal may be warranted, the DEC Project Manager will be notified for prior approval. If soil is to be removed, haulers will be appropriately licensed and trucks used to transport soil offsite will be tarped, securely covered, manifested and placarded in accordance with local, State and Federal requirements. Truck liners will be used if loads are to contain wet material capable of producing free liquid.

Vehicles leaving the site will proceed east along Jackson Street to Exchange Street (State Highway 14). This truck route is noted on the Figure 1. All trucks loaded with site materials will exit the vicinity of the site using only this approved truck route. This is the most appropriate route and takes into account: (a) limiting transport through residential areas and past sensitive sites; (b) use of City-mapped truck routes; (c) prohibiting offsite queuing of trucks entering the facility; (d) limiting total distance to major highways; (e) promoting safety in access to highways; and (f) overall safety in transport. Trucks will be prohibited from stopping and idling in the neighborhood outside the project site.

Any queuing of trucks will be performed onsite in order to minimize offsite disturbance. Offsite queuing will be prohibited.

6.0 ONSITE SOIL REUSE

As noted in Section 4.0, soil samples will be collected prior to removal of the slabs to document that onsite soils can be incorporated into the soil cover of the regraded site. The qualified environmental professional will ensure that procedures defined for material reuse are followed and that unacceptable material does not remain onsite. Contaminated onsite material (including historic fill and contaminated soil) that is acceptable to the DEC for onsite reuse will be placed

below a demarcation layer or impervious surface and will not be reused within a cover soil layer, within landscaping berms or as backfill for subsurface utility lines.

If encountered, any onsite non-masonry demolition material proposed for reuse onsite will be sampled for asbestos and the results reported to the DEC for acceptance. Concrete crushing or processing will not be performed onsite without prior DEC approval. Organic matter (wood, roots, stumps, etc.) or other solid waste derived from clearing and grubbing of the site will not be reused.

7.0 OFFSITE SOIL DISPOSAL

If the soil screening evaluation indicates the need for offsite disposal of soils, the proposed locations for excavated soils will be identified in the notification to the DEC. This will include estimated quantities and a breakdown by class of disposal facility if appropriate, i.e. hazardous waste disposal facility, solid waste landfill, petroleum treatment facility, construction demolition recycling facility, etc. Actual disposal quantities and associated documentation will be reported to the DEC in Periodic Review Reports and will include waste profiles, test results, facility acceptance letters, manifests, bills of lading and facility receipts.

Any non-hazardous historic fill and contaminated soils taken offsite will be handled as Municipal Solid Waste per 6NYCRR Part 360-1.2, at a minimum. Material that does not meet unrestricted SCOs is prohibited from being taken to a New York State recycling facility (6NYCRR Part 360-16 Registration Facility).

8.0 LIQUIDS MANAGEMENT

Groundwater is not expected to be encountered during the proposed re-grading. Liquids management is expected to be limited to wash waters from the truck and equipment decontamination area. All liquids to be removed from the site will be handled, transported and

disposed in accordance with applicable local, State and Federal regulations. Dewatering liquids, if encountered, will not be recharged back to the land surface or subsurface of the site and will be managed offsite unless prior approval is obtained from DEC.

While not anticipated, discharge of water generated during large-scale construction activities to surface waters (i.e. a local pond, stream or river) will be performed under a State Pollutant Discharge Elimination System (SPDES) permit.

9.0 COVER SYSTEM RESTORATION

As documented by the soil screening sampling, the re-grading will include a cover system of onsite soils that complies with the Record of Decision. The upper 24 inches of soil in the final re-grading will meet the soil cover criteria. If necessary, a demarcation layer consisting of orange snow fencing material, white geotextile or equivalent will be placed below the soil cover to provide a visual reference to the top of any remaining contamination zone. Soil surfaces will be seeded and mulched when final grades are established.

10.0 BACKFILL FROM OFFSITE SOURCES

Import of fill materials is not anticipated. If offsite sources should be necessary, any materials proposed for import onto the site will be approved by the qualified environmental professional and the DEC, and will comply with provisions in this re-grading plan prior to receipt at the site. A *Request to Import/Reuse Fill or Soil*[2] form will be prepared and submitted to the DEC Project Manager, allowing a minimum of 5 business days for review.

Material from industrial sites, spill sites, other environmental remediation sites or potentially contaminated sites will not be imported to the site.

[2]Form available at http://www.dec.ny.gov/regulations/67386.html

All imported soils will meet the backfill and cover soil quality standards established in 6NYCRR 375-6.7(d). Soil quality standards are listed in 6NYCRR 375-6.8 for restricted residential use. Soils that meet exempt fill requirements under 6NYCRR Part 360, but do not meet backfill or soil cover objectives, will not be imported onto the site without prior approval by the DEC. Solid waste will not be imported onto the site.

Trucks entering the site with imported soils will be securely covered. Imported soils will be stockpiled separately from excavated materials and covered to prevent dust releases.

11.0 STORMWATER POLLUTION PREVENTION

As the proposed re-grading will result in a disturbance of more than one acre, a State Pollutant Discharge Elimination System (SPDES) General Permit for Stormwater Discharges from Construction Activity will be required from the DEC. The permit consists of the Stormwater Management Plan and the Erosion and Sediment Control Plan, which are both prepared as part of the Site Plan Approval process, along with the Notice of Intent (NOI) and the Stormwater Pollution Prevention Plan (SWPPP). A SWPPP has been prepared. Barriers and hay bale checks will be installed in accordance with the SWPPP, and will be inspected once a week and after every storm event. Results of inspections will be recorded in a logbook maintained at the site and made available for inspection by the DEC. All necessary repairs shall be made immediately.

Accumulated sediments will be removed, as required, to keep the barrier and hay bale check functional. Any undercutting or erosion of the silt fence toe anchor will be repaired immediately with appropriate backfill materials.

Manufacturer's recommendations will be followed for replacing silt fencing damaged due to weathering.

Erosion and sediment control measures identified in this re-grading plan will be observed to ensure they are operating correctly. Where discharge locations or points are accessible, they

shall be inspected to ascertain whether erosion control measures are effective in preventing significant impacts to receiving waters.

12.0 EXCAVATION CONTINGENCY PLAN

If underground tanks or other previously unidentified contaminant sources are discovered during the proposed re-grading, site activities will be suspended until sufficient equipment is mobilized to address the condition and the DEC is notified.

Sampling will be performed on product, sediment and surrounding soils, etc. as necessary to determine the nature of the material and proper disposal method. Unless site history and previous sampling results provide sufficient justification to limit sampling, chemical analysis will be performed for a full list of analytes [Target Analyte List (TAL) metals; Target Compound List (TCL) volatiles and semi-volatiles, TCL pesticides and polychlorinated biphenyls (PCBs)]. If circumstances indicate a reason to limit the proposed analyses, a reduced list of analytes will be proposed to the DEC for approval prior to sampling.

Identification of unknown or unexpected contaminated media identified by screening during invasive site work will be promptly communicated by phone to the DEC's Project Manager. Reportable quantities of petroleum product, if encountered, will also be reported to the DEC spills hotline.

13.0 COMMUNITY AIR MONITORING PLAN

Air monitoring will be performed in accordance with the Community Air Monitoring Program (CAMP) included in the approved RAWP. Locations of air sampling stations, based on generally prevailing wind conditions, are shown on Figure 1. Locations will be adjusted on a daily or more frequent basis, based on actual wind direction, in order to provide an upwind and at least two downwind monitoring stations.

Exceedances of action levels listed in the CAMP will be reported to the DEC Project Manager and New York State Department of Health (DOH).

14.0 ODOR CONTROL PLAN

Adverse odors are not anticipated to be encountered, based on previous sampling at the site. If nuisance odors are identified at the site boundary or if odor complaints are received, work will be halted and the source of odors identified and corrected. Work will not resume until all nuisance odors have been abated. The DEC and DOH will be notified of all odor events and of any other complaints regarding the project. Implementation of all odor controls, including the halt of work, is the responsibility of the onsite qualified environmental professional, and any measures that are implemented will be discussed with the DEC Project Manager.

All necessary means will be employed to prevent onsite and offsite nuisances. These measures may include limiting the area of exposed soils and/or shrouding open excavations with tarps and other covers. If odors develop and cannot be otherwise controlled, additional means to eliminate odor nuisances may include the direct load-out of soils to trucks for offsite disposal (with DEC approval), use of chemical odorants in spray or misting systems and/or use of staff to monitor odors in surrounding neighborhoods.

15.0 DUST CONTROL PLAN

A dust suppression plan shall be implemented to address dust management during invasive onsite work, as follows:

- Dust suppression will be achieved through the use of a dedicated onsite water truck for road wetting. The truck will be equipped with a water cannon capable of spraying water directly onto off-road areas, including excavations and stockpiles.

- Site re-grading will be done in stages to limit the area of exposed, unvegetated soils vulnerable to dust production.

- Re-grading of the site will commence at points located farthest from the site access points and progress toward the access points, thereby assuring that equipment and vehicles will operate on the existing concrete slab as much as possible.

- The areas will be seeded and mulched as final grade elevations are reached.

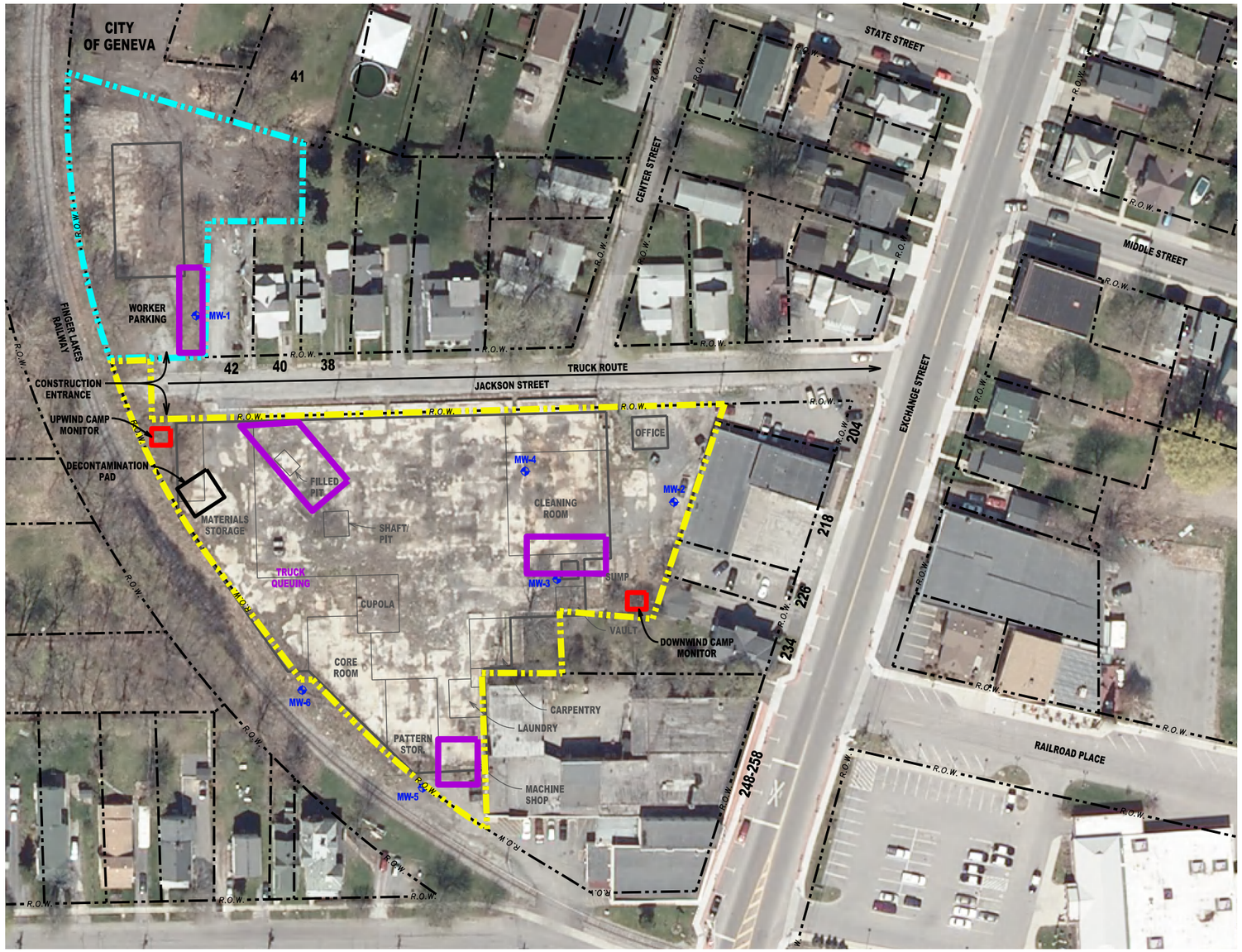
- Onsite roads will be limited in total area to minimize the area required for water truck sprinkling.

16.0 OTHER NUISANCES

A plan for rodent control is not required for the proposed re-grading, as the site currently consists of concrete foundation walls and floor slabs of the former onsite buildings.

Site work will comply with local noise control ordinances.

ATTACHMENTS



Key

- Right of Way
- Property Line
- Operable Unit 1
- Operable Unit 2
- Estimated Extend of Excavations for Restricted Residential SCOs
- Upwind & Downwind Camp Monitors
- MW-1 Monitoring Well to be Decommissioned (Installed by Others)

Plan View

1" = 100' SCALE (50 0 50 100 FEET)

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REVISIONS: | DATE: | BY:

PROJECT: FORMER GENEVA FOUNDRY SITE

DWG. TITLE: SITE PLAN

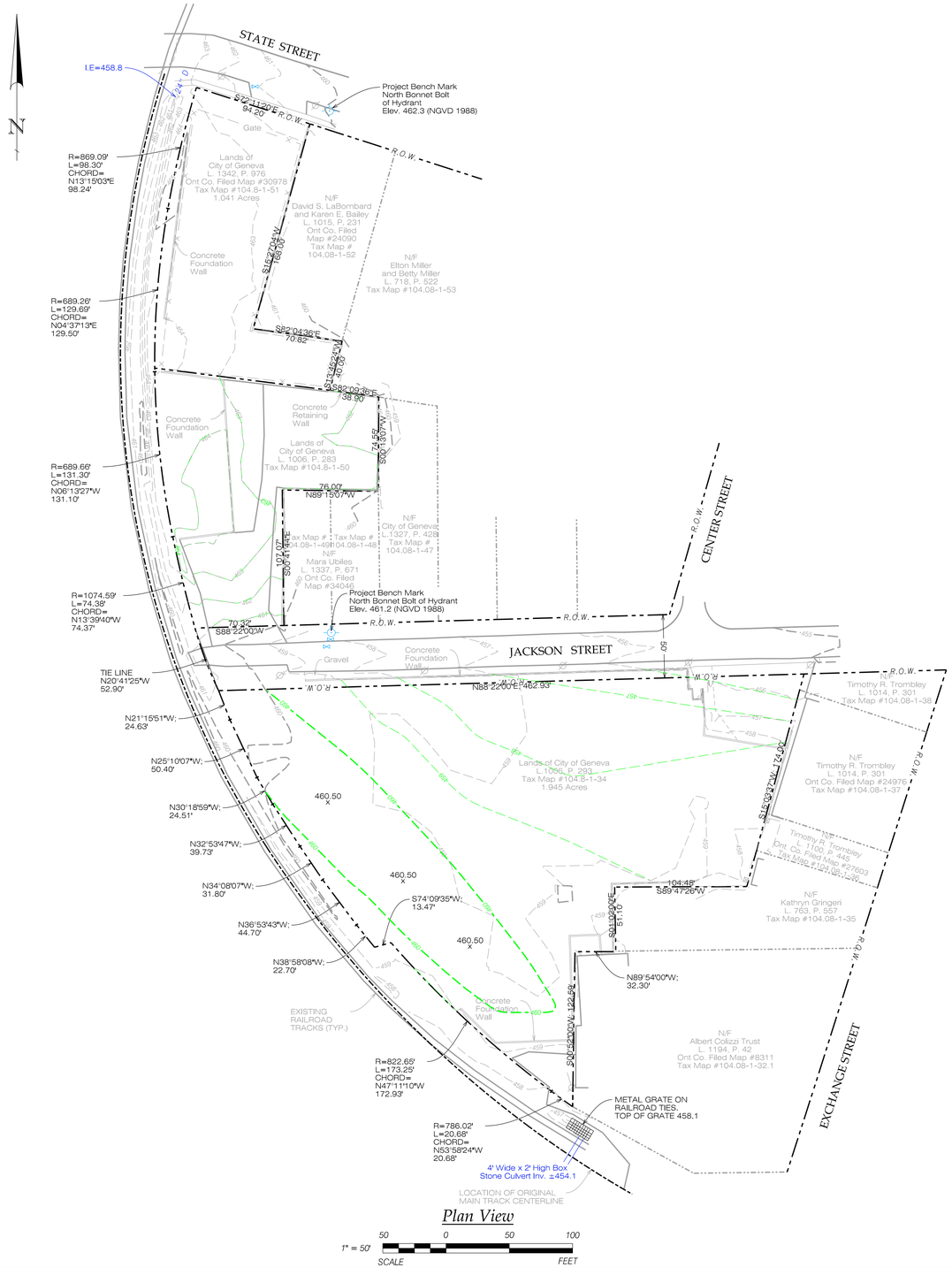
CLIENT: CITY OF GENEVA

LOCATION: CITY OF GENEVA, ONTARIO COUNTY, NEW YORK

Note: No alteration permitted hereon except as provided under Section 7209 Subdivision 2 of the New York State Education Law.

PROJECT No.:	2015003
FILE NAME.:	FIGURE 1
SCALE:	AS NOTED
DATE:	JULY 2017
ENG'D BY:	DKM
DRAWN BY:	JJL
CHECKED BY:	DRV

SHEET NO.: FIGURE 1



Plan View

1" = 50'

50 0 50 100

SCALE FEET

Key

Existing

- Property Line
- R.O.W. — Right of Way
- Lot Line
- N/F — Now or Formerly
- 24" D — Drainage Pipe w/ Size
- Fire Hydrant
- Water Valve
- 458 — Topographic Contour
- Wood Stockade Fence
- Utility Pole

Proposed

- 458 — Topographic Contour
- 460.50 — Spot Grade

General Responsibilities of Contractors

1. Site contractor is responsible for contacting the appropriate underground protection agency with adequate advance notice of the work. Utility locations shown on the drawings are not to be considered accurate or complete. No work shall begin on the site until all utilities in the area are marked. Care shall be taken to not disturb any existing buried utilities. Contractor shall bear sole responsibility for damage to existing utilities.
2. The site contractor is responsible for properly removing & disposing of all structures, fencing, trees & other debris as encountered in accordance with Federal, State & Local regulations.
3. Site contractor responsible for establishing grass over all disturbed areas.
4. Site contractor to coordinate removal of foundation/retaining walls with City and project engineer.

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Civil and Environmental Engineering

REVISIONS: DATE: BY:

1.

PROJECT:

GENEVA FOUNDRY SITE

CLIENT: CITY OF GENEVA

LOCATION: CITY OF GENEVA, ONTARIO COUNTY, NEW YORK

DWG. TITLE:

SITE RE-GRADING PLAN

PROJECT No.:	2015003
FILE NAME.:	C401
SCALE:	AS NOTED
DATE:	JULY 2017
ENG'D BY:	GAH
DRAWN BY:	GAH
CHECKED BY:	DKM

SHEET NO.:

Fig. 2

FORMER GENEVA FOUNDRY SITE
Jackson Street
City of Geneva, Ontario County, New York
BCP Site No. C835027

LIST OF SITE CONTACTS

Site Owner and Remedial Party:

CITY OF GENEVA
Mathew D. Horn, City Manager
Telephone: (315) 789-6104
Email: NLB@Geneva.ny.us

Qualified Environmental Professional:

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DEC Regional HWR Engineer:

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DEC DER Project Manager:

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