Mcpherson, Benjamin J (DEC)

From: Mcpherson, Benjamin J (DEC)
Sent: Monday, October 31, 2022 1:50 PM
To: Brian Robinson
Cc: Mcpherson, Benjamin J (DEC); Noelle Clarke; Caprio, Andrea (DEC)
Subject: RE: 350 - Pipe Removal Procedure

Brian,

Thank you for the additional details, they have satisfied my previous questions. It is my understanding that these procedures will be used to remove all known refinery piping at the site, which is a modification of the RAWP and DD. As this change is broader in scope than the original work it is an acceptable to the Department to implement these changes.

Please let me know if you have any questions regarding this.

Thank you,
Ben McPherson

Benjamin McPherson, P.E.
(he/him/his)
Professional Engineer 1 (Environmental), Division of Environmental Remediation

New York State Department of Environmental Conservation
700 Delaware Avenue, Buffalo, NY 14209
P: (716) 851-7220 | F: (716) 851-7226 | benjamin.mcpherson@dec.ny.gov
www.dec.ny.gov

From: Brian Robinson <brobinson@rouxinc.com>
Sent: Tuesday, October 25, 2022 1:09 PM
To: Mcpherson, Benjamin J (DEC) <benjamin.mcpherson@dec.ny.gov>
Subject: 350 - Pipe Removal Procedure

Ben,

Last week we began investigating the purple GPR-identified linear anomalies on the attached Figure 9 to uncover, remove, and cap (if applicable, see below) any subsurface piping on site. These anomalies are based on a GPR survey that was conducted in 2015 (see attached Naeva GPR Survey PDF, which includes the location IDs of the anomalies). Below is a summary of the procedure we've been using to investigate these anomalies, as well as how to manage cutting, capping, and removal of any pipes encountered.

1. Cross reference the Figure 9 map with the Naeva GPR map to determine IDs for the anomalies (e.g., ?70, ?71, etc.)
2. Use GPS to mark out (with paint or flags) the section of the anomaly to investigate.

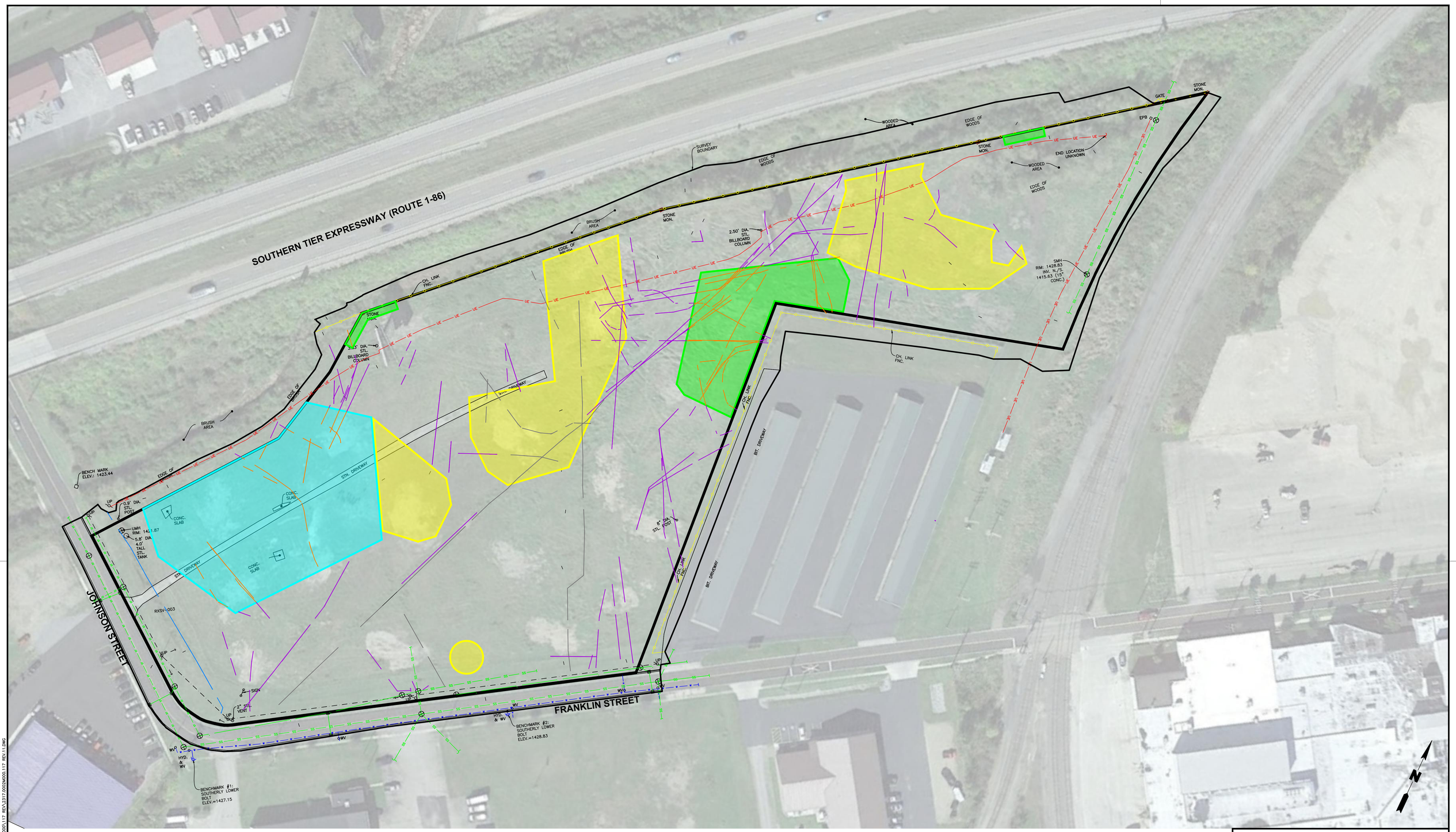
3. Generally, at each investigation location, a 10-foot-long trench oriented perpendicular to and centered across the linear anomaly was excavated down to 10 feet depth or until pipes were encountered. In cases where multiple linear anomalies intersected or were within <10 feet of each other, a single trench was excavated at the intersection or at the narrowest point between the anomalies. For particularly long anomalies, or anomalies with discontinuous sections, multiple trenches may be necessary if piping is not located during the first trench.
4. Record general observations about soil conditions (color, grain size, moisture, odor, presence of GCM, etc.). If we encounter GCM in soil, it will be stockpiled separately on poly for disposal. Any other soil may be stockpiled on the ground surface adjacent to the trench and used to backfill the hole. Collect a baggie of the soil intended to be replaced in the hole for PID headspace reading – we target the "worst-looking" soil for this.
5. If piping is encountered, TREC will work to expose it the entire length until they reach one of the following: property boundary, appropriate buffer from a known active utility (e.g., 6 feet from center of electric line), or some other obstruction.
6. Record observations about piping or any other structures encountered (e.g., scrap metal). Note the depth encountered, diameter of piping, approximately how many pipes, and length of piping removed. Note any liquids or sludge in the pipe. Any petroleum product or water with petroleum product (globules or measurable product) should be drained from the pipe into buckets and containerized in 55-gallon steel drums with pending analysis stickers. Pipe sludge should be sampled for PID. Sludge with indications of petroleum impacts (odor, elevated PID readings, sheen, etc.) should be managed as GCM.
7. Any cuts being made with the Sawzall on a pipe containing petroleum or petroleum contaminated materials requires a Hot Work Permit and appropriate procedure (Fire watch, 5-Gas meter in vicinity, etc.).

Regards,

Brian Robinson, PE – CT, FL, MA, ME, NH, NY, RI, TN, VT
Senior Engineer
200 Summit Drive, Suite 500, Burlington, MA 01803
Main: 781.569.4000 | Direct: 781.569.4047
Email: brobinson@rouxinc.com | Website: www.rouxinc.com

ROUX

California | Illinois | Massachusetts | New Jersey | New York | Texas | Virginia



LEGEND

SANITARY/STORM SEWER DRAINAGE STRUCTURE LOCATION

VISUALLY CONFIRMED PIPING AND GPR LINES

- APPROXIMATE LOCATION OF UNDERGROUND PIPE OUTSIDE LIMITS OF PROPOSED EXCAVATION, TO BE CAPPED AND/OR ABANDONED IN PLACE AS APPROPRIATE
- PIPE DESIGNATED FOR REMOVAL DURING EXCAVATION ACTIVITIES
- ASSESSED SUBSURFACE PIPING TO BE LEFT IN PLACE
- REMOVED SUBSURFACE PIPING

- SITE BOUNDARY
- NEIGHBORING FENCE LINE
- SURVEY BOUNDARY
- UNDERGROUND WATER UTILITY
- UNDERGROUND STORM SEWER UTILITY
- UNDERGROUND SANITARY SEWER UTILITY
- UNDERGROUND ELECTRIC UTILITY
- OVERHEAD ELECTRIC UTILITY

AREAS OF PETROLEUM-RELATED IMPACTS, PROPOSED TO BE ASSESSED FOR ABSENCE OF GCM VIA MONITORING WELL INSTALLATION AND LNAPL GAUGING. PORTIONS IN WHICH GCM IS IDENTIFIED WILL BE REMEDIED VIA EXCAVATION AND/OR SOLIDIFICATION, AND CAPPING.

PROPOSED TRACK 4 BUILDING FOOTPRINT (WITH 22.5' OFFSET) WHERE PETROLEUM-RELATED IMPACTS ARE PROPOSED TO BE MITIGATED VIA EXCAVATION AND/OR SOLIDIFICATION AND CAPPING

AREAS OF GCM AND/OR LNAPL, PROPOSED TO BE MITIGATED VIA EXCAVATION, AND/OR SOLIDIFICATION, AND CAPPING

SOURCE:

WENDEL WD ARCHITECTURE, ENGINEERING, SURVEYING AND LANDSCAPE ARCHITECTURE, P.C., TOPOGRAPHIC SURVEY, DWG. NO. V100, DATED DECEMBER 17, 2020

AERIAL IMAGE OBTAINED FROM GOOGLE EARTH

NOTES:

ALL FEATURES ARE APPROXIMATE, SUBSURFACE PIPE LOCATIONS IDENTIFIED VIA GROUND PENETRATING RADAR (GPR) SURVEY

ALL REMEDY AREAS ARE TRACK 4 EXCEPT WHERE NOTED

ALL PIPES FOUND TO CONTAIN RESIDUAL PETROLEUM LIQUIDS WILL BE DRAINED, CAPPED, AND CLEANED PRIOR TO ABANDONMENT

50' 0 50'

Title:

SUBSURFACE PIPING

350 FRANKLIN STREET
OLEAN, NEW YORK

Prepared for:

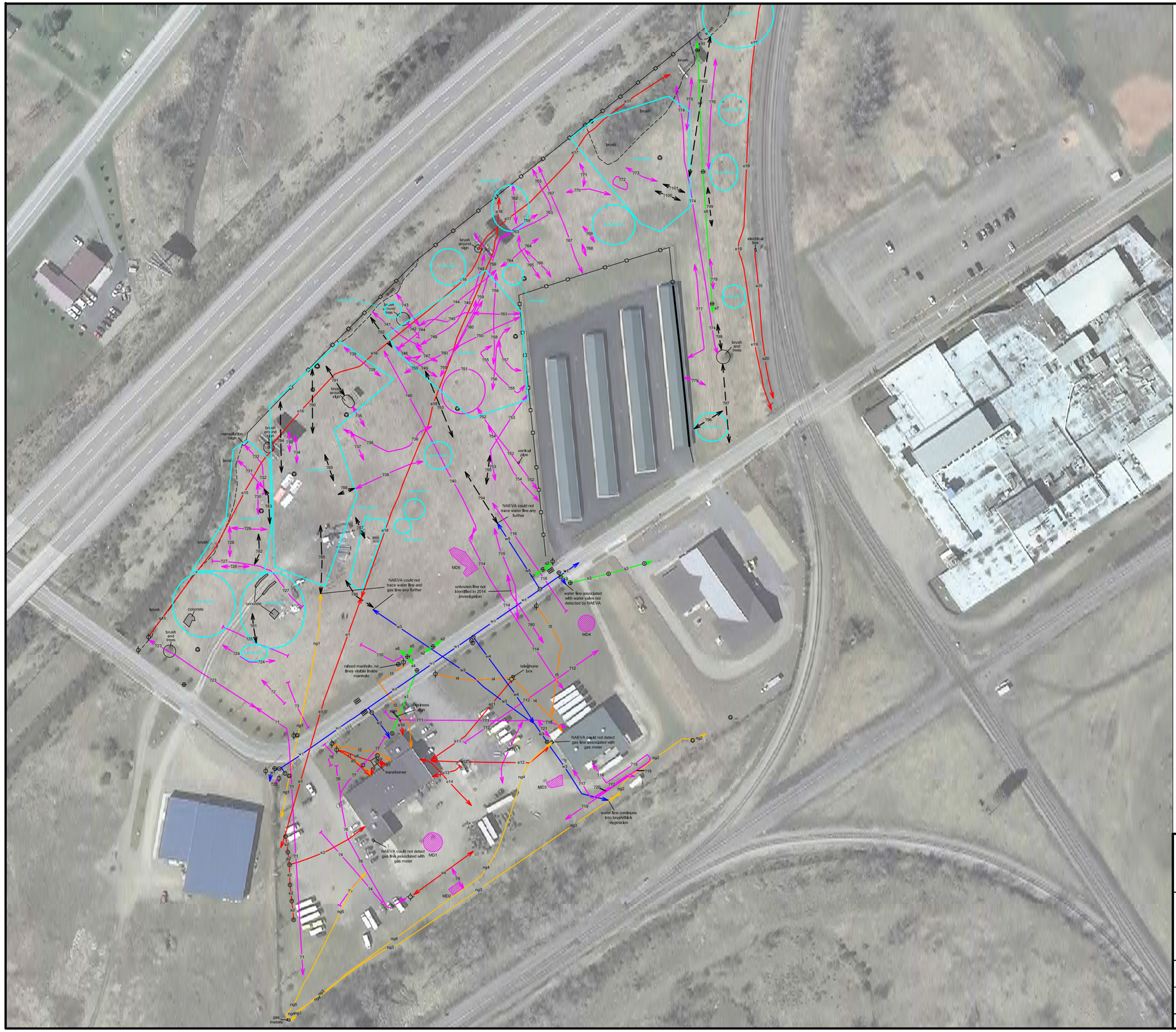
MJ PAINTING CONTRACTOR CORP.

ROUX

Compiled by: MV	Date: 2/15/2021
Prepared by: MV	Scale: AS SHOWN
Project Mgr: BR	Project: 2317.0002M000
File: 2317.0002M000.117 REV.11.DWG	

FIGURE 9

N:\PROJECTS\MJ PAINTING CONTRACTOR CORP\2317.0002M000.117 REV\2317.0002M000.117 REV.11.DWG



LEGEND

- e — electric line
- w — water line
- ng — natural gas line
- s — sewer line
- t — telephone line
- ? — suspected utility of unknown use
- — —?— — EM31 linear anomaly
- metal detector (MD) anomaly
- catch basin
- monitoring well
- manhole cover
- water valve
- sewer cleanout
- utility pole
- light post
- electrical post
- landscape lighting
- fire hydrant
- electromagnetic (EM) anomalous area

*NOTE: natural gas lines "ng3", "ng4", and "ng5" were marked out by different contractors than NAEVA

approximately

0m 25m 50m

Scale: One inch equals approximately fifty meters

NAEVA GEOPHYSICS, INC.
THE LEADER IN SUBSURFACE DETECTION
Subsurface Geophysical Surveys

225 N Route 303, Suite 102
Congers, NY 10920
(845)268-1800
(845)268-1802 FAX

Figure 2. Combined Results from
2014 and 2015 Geophysical Investigations
350-351 Franklin Street
Olean, New York

Client	Roux Associates	Dates of Work	October 13-17, 2014 and June 9-14, 2015
Project No.	C1410131X & C1506091X	Map By	Kelly Weyer

ALL UNDERGROUND FACILITIES MAY NOT BE DEPICTED ON THIS MAP

APPENDIX A

Table 1. List of Detected Subsurface Utilities and EM31 Anomalies for 350 Franklin Street

Anomaly ID	Suspected Source	Approximate Depth	Notes and Comments
e15	electric line	unknown	service from utility pole to western billboard sign
e16	electric line	unknown	service from western billboard sign to eastern billboard sign
e17	electric line	unknown	runs east from cut-off conduit at eastern billboard sign
e18	electric line	~3 to 6 feet	Continuation of electric line "e1" from 2014 investigation
e19	electric line	~2 to 4 feet	electric line running parallel to railroad tracks, possible associated with railroad service
e20	electric line	unknown	electric line associated with electric conduit box along railroad tracks
s7	sewer line	~11 to 12 feet to top of pipe, appears to get deeper towards the north	~18 to 24 inch diameter sewer pipe. Heads south from manhole. Could not trace due to depth of pipe.
s8	sewer line	~11 to 12 feet to top of pipe, appears to get deeper towards the north	~18 to 24 inch diameter sewer pipe. Runs north-south on eastern side of property
s9	sewer line	~11 to 12 feet to top of pipe, appears to get deeper towards the north	~18 to 24 inch diameter sewer pipe. Runs north-south on eastern side of property
s10	sewer line	~11 to 12 feet to top of pipe, appears to get deeper towards the north	~18 to 24 inch diameter sewer pipe. Heads north from manhole. Could not trace due to depth of pipe.
?23	unknown	unknown	NAEVA could not determine the source of this feature. Appears to be continuation of unknown line "?1" from 2014 investigation.
?24	unknown	unknown	NAEVA could not determine the source of this feature
?25	unknown	~3 to 5 feet	NAEVA could not determine the source of this feature
?26	unknown	unknown	NAEVA could not determine the source of this feature
?27	unknown	~1 to 2 feet	NAEVA could not determine the source of this feature

Table 1. List of Detected Subsurface Utilities and EM31 Anomalies for 350 Franklin Street (cont.)

Anomaly ID	Suspected Source	Approximate Depth	Notes and Comments
?28	unknown	unknown	NAEVA could not determine the source of this feature
?29	unknown	unknown	NAEVA could not determine the source of this feature
?30	unknown	unknown	NAEVA could not determine the source of this feature
?31	unknown	unknown	NAEVA could not determine the source of this feature
?32	unknown	unknown	NAEVA could not determine the source of this feature
?33	unknown	unknown	NAEVA could not determine the source of this feature
?34	unknown	unknown	NAEVA could not determine the source of this feature
?35	unknown	unknown	NAEVA could not determine the source of this feature
?36	unknown	unknown	NAEVA could not determine the source of this feature
?37	unknown	unknown	NAEVA could not determine the source of this feature
?38	unknown	unknown	NAEVA could not determine the source of this feature
?39	unknown	unknown	NAEVA could not determine the source of this feature
?40	unknown	unknown	NAEVA could not determine the source of this feature. Appears to be continuation of unknown line "?14" from 2014 investigation.
?41	unknown	unknown	NAEVA could not determine the source of this feature
?42	unknown	unknown	NAEVA could not determine the source of this feature
?43	unknown	unknown	NAEVA could not determine the source of this feature. Maybe related to unknown line "?45".
?44	unknown	unknown	NAEVA could not determine the source of this feature
?45	unknown	~1 to 3 feet	NAEVA could not determine the source of this feature. Maybe related to unknown line "?43".

Table 1. List of Detected Subsurface Utilities and EM31 Anomalies for 350 Franklin Street (cont.)

Anomaly ID	Suspected Source	Approximate Depth	Notes and Comments
?46	unknown	unknown	NAEVA could not determine the source of this feature
?47	unknown	unknown	NAEVA could not determine the source of this feature
?48	unknown	~2 to 4 feet	NAEVA could not determine the source of this feature
?49	unknown	unknown	NAEVA could not determine the source of this feature
?50	unknown	unknown	NAEVA could not determine the source of this feature
?51	unknown	unknown	NAEVA could not determine the source of this feature. Circular feature, may be former ringholder for aboveground tank.
?52	unknown	~3 to 5 feet	NAEVA could not determine the source of this feature. Appears to run through visible aboveground cut-off pipe, ~8" to 10" in diameter.
?53	unknown	~3 to 5 feet	NAEVA could not determine the source of this feature
?54	unknown	unknown	NAEVA could not determine the source of this feature. Appears to join unknown line "?52".
?55	unknown	unknown	NAEVA could not determine the source of this feature
?56	unknown	unknown	NAEVA could not determine the source of this feature
?57	unknown	unknown	NAEVA could not determine the source of this feature. Appears to be beginning of circular feature, maybe another ringholder for an aboveground tank.
?58	unknown	unknown	NAEVA could not determine the source of this feature
?59	unknown	~1 to 3 feet	NAEVA could not determine the source of this feature
?60	unknown	unknown	NAEVA could not determine the source of this feature
?61	unknown	unknown	NAEVA could not determine the source of this feature

Table 1. List of Detected Subsurface Utilities and EM31 Anomalies for 350 Franklin Street (cont.)

Anomaly ID	Suspected Source	Approximate Depth	Notes and Comments
?62	unknown	~1 to 3 feet	NAEVA could not determine the source of this feature
?63	unknown	~2 to 4 feet	NAEVA could not determine the source of this feature
?64	unknown	unknown	NAEVA could not determine the source of this feature
?65	unknown	unknown	NAEVA could not determine the source of this feature
?66	unknown	unknown	NAEVA could not determine the source of this feature
?67	unknown	~2 to 5 feet, appears to get deeper towards the north	NAEVA could not determine the source of this feature
?68	unknown	unknown	NAEVA could not determine the source of this feature
?69	unknown	unknown	NAEVA could not determine the source of this feature
?70	unknown	unknown	NAEVA could not determine the source of this feature
?71	unknown	unknown	NAEVA could not determine the source of this feature
?72	unknown	unknown	NAEVA could not determine the source of this feature. Irregular circular feature, maybe reinforced concrete or grounding cable/wire.
?73	unknown	unknown	NAEVA could not determine the source of this feature
?74	unknown	~1 to 4 feet	NAEVA could not determine the source of this feature
?75	unknown	unknown	NAEVA could not determine the source of this feature
?76	unknown	unknown	NAEVA could not determine the source of this feature
?77	unknown	unknown	NAEVA could not determine the source of this feature
?78	unknown	unknown	NAEVA could not determine the source of this feature
?79	unknown	unknown	NAEVA could not determine the source of this feature
?80	unknown	unknown	NAEVA could not determine the source of this feature
?81	unknown EM31 linear anomaly	unknown	NAEVA could not determine the source of this feature

Table 1. List of Detected Subsurface Utilities and EM31 Anomalies for 350 Franklin Street (cont.)

Anomaly ID	Suspected Source	Approximate Depth	Notes and Comments
?82	unknown EM31 linear anomaly	unknown	NAEVA could not determine the source of this feature
?83	unknown EM31 linear anomaly	unknown	NAEVA could not determine the source of this feature. Maybe related to unknown line "?31"
?84	unknown EM31 linear anomaly	unknown	NAEVA could not determine the source of this feature
?85	unknown EM31 linear anomaly	unknown	Appears to be continuation of gas line "ng1" from 2014 investigation. NAEVA could not confirm this with any other instruments.
?86	unknown EM31 linear anomaly	unknown	Appears to be continuation of water line "w3" from 2014 investigation. NAEVA could not confirm this with any other instruments.
?87	unknown EM31 linear anomaly	unknown	NAEVA could not determine the source of this feature
?88	unknown EM31 linear anomaly	unknown	NAEVA could not determine the source of this feature. Maybe related to unknown line "?38".
?89	unknown EM31 linear anomaly	unknown	NAEVA could not determine the source of this feature
?90	unknown EM31 linear anomaly	unknown	NAEVA could not determine the source of this feature. Runs through gas marker post, may be continuation of gas line "ng1" from 2014 investigation.
?91	unknown EM31 linear anomaly	unknown	NAEVA could not determine the source of this feature. Maybe related to unknown line "?35".
?92	unknown EM31 linear anomaly	unknown	NAEVA could not determine the source of this feature
?93	unknown EM31 linear anomaly	unknown	NAEVA could not determine the source of this feature

Table 1. List of Detected Subsurface Utilities and EM31 Anomalies for 350 Franklin Street (cont.)

Anomaly ID	Suspected Source	Approximate Depth	Notes and Comments
?94	unknown EM31 linear anomaly	unknown	Appears to be continuation of water line "w5" from 2014 investigation. NAEVA could not confirm this with any other instruments.
?95	unknown EM31 linear anomaly	unknown	NAEVA could not determine the source of this feature. Maybe related to unknown line "?53".
?96	unknown EM31 linear anomaly	unknown	NAEVA could not determine the source of this feature. Maybe related to unknown EM31 linear anomaly "?97".
?97	unknown EM31 linear anomaly	unknown	NAEVA could not determine the source of this feature. Maybe related to unknown EM31 linear anomaly "?96" and/or "?98".
?98	unknown EM31 linear anomaly	unknown	NAEVA could not determine the source of this feature. Maybe related to unknown EM31 linear anomaly "?97".
?99	unknown EM31 linear anomaly	unknown	NAEVA could not determine the source of this feature
?100	unknown EM31 linear anomaly	unknown	NAEVA could not determine the source of this feature
?101	unknown EM31 linear anomaly	unknown	NAEVA could not determine the source of this feature. Maybe related to unknown line "?73".
?102	unknown EM31 linear anomaly	unknown	NAEVA could not determine the source of this feature
Anomaly A	unknown	unknown	Concrete pad visible at surface. Large area of high conductivity with some small inphase anomalies.
Anomaly B	unknown	unknown	Area of several linear EM31 anomalies, both in the inphase and conductivity data. NAEVA identified several unknown lines with other instruments, however, EM31 data indicates more features than were identified.

Table 1. List of Detected Subsurface Utilities and EM31 Anomalies for 350 Franklin Street (cont.)

Anomaly ID	Suspected Source	Approximate Depth	Notes and Comments
Anomaly C	unknown	unknown	Very large area with very high conductivity and inphase readings. NAEVA identified several unknown lines in this area, and a natural gas line and water line are headed into this area. Could be large amounts of metal and/or conductive material in this area. Large anomaly may be obscuring other linear features (such as gas line and water line).
Anomaly D	unknown	unknown	Several concrete pads/debris visible at surface. Another large area of very high conductivity and inphase readings. Could be large amounts of metal and/or conductive material in this area. Large anomaly may be obscuring other linear features.
Anomaly E	unknown	unknown	Small area of high conductivity readings, with not as high inphase readings. Maybe related to Anomaly D.
Anomaly F	unknown	unknown	Area of some high conductivity and inphase readings. Very near electric line "e18". Maybe buried metallic/conductive debris.
Anomaly G	unknown	unknown	Small are of high conductivity readings, with no obvious inphase anomaly. Maybe relatively small amount of buried metallic/conductive feature.
Anomaly H	unknown	unknown	2 relatively small, discrete inphase anomalies, with no corresponding conductivity anomalies. Possible buried metallic features.

Table 1. List of Detected Subsurface Utilities and EM31 Anomalies for 350 Franklin Street (cont.)

Anomaly ID	Suspected Source	Approximate Depth	Notes and Comments
Anomaly I	unknown	unknown	A strong inphase anomaly, with very little corresponding conductivity anomaly. Unknown line "?40" runs through this feature. Possible buried metallic/conductive feature, maybe related to unknown line "?40".
Anomaly J	unknown	unknown	Another very large area with very high conductivity and inphase readings. NAEVA identified several unknown lines and an electric line in this area. Could be large amounts of metal and/or conductive material in this area. Large anomaly may be obscuring other linear features.
Anomaly K	unknown	unknown	2 relatively small, discrete inphase anomalies, with no corresponding conductivity anomalies. Possible buried metallic features.
Anomaly L	unknown	unknown	Several small, discrete inphase anomalies, with small or no corresponding conductivity anomalies. Possible buried metallic/conductive features.
Anomaly M	unknown	unknown	Several discrete inphase anomalies with no corresponding conductivity anomalies. Electric lines "e17" and "e18" and unknown line "?62" are located in this area. Possible buried metallic features.
Anomaly N	unknown	unknown	2 relatively small, discrete inphase anomalies, with no corresponding conductivity anomalies. Possible buried metallic features.

Table 1. List of Detected Subsurface Utilities and EM31 Anomalies for 350 Franklin Street (cont.)

Anomaly ID	Suspected Source	Approximate Depth	Notes and Comments
Anomaly O	unknown	unknown	Area of relatively high conductivity readings with some low conductivity readings. No corresponding inphase anomaly. Possible buried conductive/resistive materials and/or features. Maybe related to Anomaly P.
Anomaly P	unknown	unknown	An area of very high conductivity and inphase readings. Some unknown lines and linear EM31 features located in this area. Could be large amounts of metal and/or conductive material in this area. Large anomaly may be obscuring other linear features.
Anomaly Q	unknown	unknown	Several small, discrete inphase anomalies and some relatively high conductivity readings. Possible buried metallic/conductive features.
Anomaly R	unknown	unknown	Some small inphase anomalies with no conductivity anomaly. Possible metallic debris. Maybe shallow or at surface. Area had high and thick vegetation.
Anomaly S	unknown	unknown	Some small inphase anomalies with no conductivity anomaly. Possible metallic debris. Maybe shallow or at surface. Area had high and thick vegetation.
Anomaly T	unknown	unknown	Small area of high inphase readings with no corresponding conductivity anomaly. Possible shallow/surface metallic feature(s).

Table 1. List of Detected Subsurface Utilities and EM31 Anomalies for 350 Franklin Street (cont.)

Anomaly ID	Suspected Source	Approximate Depth	Notes and Comments
Anomaly U	unknown	unknown	Strong, discrete inphase and conductivity anomaly. Unknown EM31 linear anomaly "?96" is near this feature. Possible buried metallic/conductive feature(s).