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Soil MP

ENVIRONMENTAL RESOURCES MANAGEMENT

SOIL MANAGEMENT PLAN

500 MAMARONECK AVENUE
HARRISON, NEW YORK

5 NOVEMBER 2002

Prepared For:

W&M Properties of New York L.L.C.
60 East 42nd Street, 26thFloor
New York, NY 10165

Prepared By:

ENVIRONMENTAL RESOURCES MANAGEMENT
520 Broad Hollow Road, Suite 210
Melville, NY 11797

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500 Mamaroneck/X8101.00.01.2077

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1.0 *SITE BACKGROUND*

Subsurface soil at 500 Mamaroneck Avenue (site) has been impacted by operation of the Town of Harrison Municipal Incinerator, which formerly occupied the property. Residual municipal waste, ash/slag and atmospheric deposition of particulates from the incinerator remain in the subsurface soil at the site. The concentrations of polynuclear aromatic hydrocarbons (PAHs) and certain metals (arsenic, barium, cadmium, calcium, chromium, copper, lead, magnesium, mercury, nickel, and zinc) exceed Recommended Soil Clean up Objectives (RSCOs) specified in the New York State Department of Environmental Conservation Technical and Guidance Memorandum Number 4046 (TAGM 4046). The residuals are capped by the building, parking areas paved with bituminous material and landscaped areas. Direct contact with the residuals is thereby controlled and the potential for contact minimized.

Maintenance activities to be carried out at the site that involve excavation of subsurface soil have the potential for site workers to contact the residuals and to generate waste material that may require proper management. This plan identifies the activities that may require management of excavated soil generated at 500 Mamaroneck Avenue.

2.0 *APPLICATION OF THE SOIL MANAGEMENT PLAN*

For the capping at 500 Mamaroneck Avenue to remain protective, all subsurface soil must remain at least two feet below final grade. Management measures must be implemented should any of the following activities occur:

- Excavation of soil from beneath the asphalt subbase in the parking areas. If soil from beneath the subbase is exposed without excavation, dust suppression measures may be required.
- Excavation of subsurface soil, from more than 2-feet below the vegetative layer in landscaped or grassed areas.
- Regrading (i.e., cutting) that would reduce the thickness of the existing surface soil layer to less than two feet, or would otherwise place subsurface soil in the top two-foot surface soil interval.

Should any of the above activities be carried out, the Soil Management Plan, presented in the following section, should be followed to properly manage the soil.

3.0 *IMPLEMENTATION OF THE SOIL MANAGEMENT PLAN*

The goal of this Soil Management Plan is to properly manage soil that is excavated during future work activities on the Site. Therefore, this section is structured to present reasonable procedures and precautions to ensure that future work activities are implemented safely, without impacting Site workers or the environment. Because the concentrations of PAHs, polychlorinated biphenyls (PCBs), and metals in subsurface soil is highly variable across the site, precautions must be taken during all excavation activities.

3.1 *WORK PROCEDURES FOR EXCAVATION ACTIVITES*

If any future work (e.g., pipe installation, soil grading, landscaping, etc.) is conducted involving excavation, the procedures identified below will be implemented.

- Workers will not be required to wear protective clothing, however, eating, drinking and smoking in the vicinity of the excavation is strictly prohibited.
- Respiratory protection (i.e., respirators) is not anticipated to be necessary, however, dust masks are recommended. This level of protection is acceptable provided that airborne dust concentrations are minimized by water misting and/or good work practices. Visible airborne dust concentrations are not acceptable.
- Any excavated soil will be stockpiled on site, or staged in rolloffs, at all times until final determinations are made regarding disposal or re-use. Any stockpiles will be lined with seamless plastic sheeting, and covered with polyethylene sheeting.
- Anthropogenic material such as tires, metallic debris, bottles, stained soil should be segregated and disposed off-site.
- The stockpiled soil and/or other excavated materials will be stored in a secure area of the site until analytical results are obtained.
- Off-Site disposal of excavated soil is required, unless it can be demonstrated that the concentrations of residuals are below TAGM

4046 RSCOs. To demonstrate that excavated soil has not been impacted, a statistically significant number of samples should be collected from any excavated soil considered for reuse and analyzed using applicable USEPA analytical methods and the analytical results compared to TAGM 4046 RSCOs (see SW 846 for sampling program design). Refer to Section 3.2 for Off-Site Disposal Options.

- The asphalt surface for the 2-foot soil cover should be restored after work activities are complete. If the asphalt surface or 2-feet of cover will not be restored, NYSDEC project representatives should be consulted to determine if there is a need for any further action.

3.2 *SOIL DISPOSAL REQUIREMENTS*

This section is intended as a guideline for future site workers, to ensure the proper management of excavated soil that will be disposed off-Site. Because the solid and hazardous waste regulations are in a continuous state of change, this section provides only general guidelines, and is current as of July 2000. Any future soil disposal, if necessary, must be conducted in accordance with the regulations current at the time the disposal activities will take place. All applicable and appropriate standards, guidance and criteria will be followed to properly manage any remedial waste that is generated.

If off-Site disposal of soil is required, the soil must be characterized for disposal purposes, in accordance with the requirements of the disposal facilities. Once disposal facility approval has been obtained, the soil will be transported in disposal trailers or rolloffs, to the appropriate, selected off-Site disposal facility. Any applicable waste manifesting, truck placarding, or other requirements will be followed.

In general, three categories of soil could be generated for off-Site disposal:

- Non-regulated "industrial waste" soil;
- RCRA-regulated hazardous waste soil; and

- TSCA-regulated soil containing PCBs (In New York, TSCA-regulated PCB soil is considered a New York State hazardous waste).

Non-regulated soil would consist of soil that does not contain constituents at concentrations high enough to be considered a TSCA or RCRA regulated waste.

Promulgated federal regulations (i.e., the June 1998 PCB Rule) regulate the disposal of soil if it contains PCBs at or above a concentration of 50 mg/kg. The Waste Management landfill in Model City, New York is currently permitted under TSCA to accept PCB soil for disposal.