Final

SOIL MANAGEMENT PLAN
OLINDO IMPORT FOODS, INC.
1510 LYELL AVENUE
ROCHESTER, NEW YORK
SITE #V00217

Prepared for:

Olindo Import Foods, Inc.
1510 Lyell Avenue
Rochester, New York

Prepared by:

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July 2003

GeoQuest Job No. 51502

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Erin M. Crotty
Commissioner

November 14, 2003

Mr. Olindo Di Francesco
1510 Lyell Avenue
Rochester, New York 14606

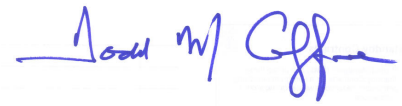
RE: Olindo Foods Inc. V00217-8 Remedial Action Plan and Soil Management Plan Monroe(C), Rochester(C)

Dear Mr. Di Francesco:

The Department has completed its review of the referenced remediation work plan for the Olindo Foods Site. Based up the information and representations given in the referenced work plan and the approved investigation reports, the Remediation Work Plan dated October 2003 and Soils Management Plan dated July 2003 are hereby approved subject to the 30-day public comment period ending December 19, 2003.

Please contact me at 226-5350 if you have any questions. Thank you for your continued cooperation.

Sincerely,



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1.0 INTRODUCTION

Document Purpose

This soil management plan (SMP) has been developed to assist future developers and current facility operators during project planning for development or subsurface maintenance of utilities. Fill soils that may be excavated during development or subsurface maintenance of utilities must be managed at the Olindo Import Foods, Inc. site. Management requirements for sampling and analysis, characterization for disposal, soil monitoring, and health and safety issues for the Olindo Import Foods, Inc. site may be modified for future site development with approval from the appropriate agencies.

In the future, possible redevelopment or expansion to the existing facilities within the confines of the Olindo Import Foods, Inc. site will require that ash-fill will need to be properly managed since fill soils may contain concentrations of heavy metals that exceed NYSDEC TAGM 4040 soil guidance values. Proper soil management requires that care be taken in planning, monitoring, and testing excavated ash-fill soil and this document provides guidance for planning and performance of such monitoring, testing, and management.

2.0 SITE BACKGROUND

The Olindo Import Foods facility is located at 1510 Lyell Avenue, Rochester New York (Site). Olindo Import Foods has operated as a food distribution facility and retail food store at this site for more than 15 years. Olindo acquired the site in September 1982. Before 1982, the site was occupied by businesses involved in scrap metal recycling from approximately 1950 to the late 1970s. The main building at the facility is used for the storage distribution and retail sale of food products. The building houses a retail food store, supporting offices, a maintenance garage for delivery vehicles, and cold food storage. A 360-foot extension of the northern building, which lies along the eastern border of the property, serves as the loading dock. The southernmost site building is a leased property and is located at 1069 Lyell Avenue. This facility is used for the storage of food products and dry goods and pre-dates Olindo Import Foods and was most likely part of the scrap metal facility that previously occupied the site. The area immediately surrounding the buildings consists of a paved parking lot and two trash dumpsters.

The two site buildings have a combined floor space of approximately 40,000 square feet. The smaller building consists of approximately 4,800 square feet and was constructed between 1926 and 1950. The northernmost section of the main building appears to have been constructed between 1926 and 1950 as well. One addition to the main building appears to have been constructed in 1964 and another in 1971. Two

additions were constructed by Olindo in approximately 1988 and consist of a 360-foot-long section that runs the length of the facility's easternmost property boundary.

A former 3,000-gallon diesel underground storage tank that was located north of the small storage building was removed by Environmental Strategies Corporation (ESC). The facility's non-hazardous wastes are disposed of by Waste Management, Inc. and the small quantities of used oil that are generated are disposed of by Bison Waste Oil, Inc. Hazardous waste is not generated at the facility. Transformers and other potential polychlorinated biphenyls-containing equipment are not located at the Olindo facility according to ESC. Potable and sanitary water is supplied to the facility by the City of Rochester municipal water system. Sanitary wastewater is discharged to publicly owned sewers and conveyed to a wastewater treatment facility operated by Monroe County Pure Waters. Storm water at the Olindo facility reportedly discharges to a storm water ditch located along Lyell Avenue.

The site subsurface soils consists of an approximately 4-foot-thick layer of dark brown to black sand and gravel fill, based on soils encountered at the soil boring locations on the Olindo Import Foods site. This soil deposit fill is characterized by numerous fragments of ash, brick, glass, metal, wood, cinders and other debris. Underlying the fill is a thin layer (1 to 2 feet) of medium brown to pink fine sandy silt (Lacustrine soils). The silt is damp to moist, well sorted, and contains minor amounts of clay. Below the silt layer, the sediments become coarser with depth. At 9 to 11 feet, the sediments are characterized by an angular to subangular gravel with medium to coarse sand (Glacial Till soils). The regional groundwater flow in the area is assumed to be towards the north in the direction of Lake Ontario.

3.0 PREVIOUS INVESTIGATIONS

ESC performed a Phase I Environmental Assessment (ESA) and a Phase II ESA of the Olindo facility from January 13 though 22, 1999. The Phase I and Phase II ESA reports were provided to the NYSDEC with the Voluntary Cleanup Program application dated February 19, 1999. The results of the Phase I and Phase II assessments are summarized below.

A Phase I environmental assessment of the Olindo facility was conducted on January 13, 1999. Based on the site visit and information review, the following areas of potential environmental concern were identified:
Parking Lot: Sanborn Fire Insurance maps dated 1926, 1950, and 1971 indicated that the property now occupied by Olindo was formerly part of the adjacent Atkins Waste Materials, Inc., facility (then known as the Leach Steel Corporation). Atkins operates a scrap metal recovery facility. The Olindo parcel was apparently used to store scrap metal from at least 1950 through 1971. The primary site feature during this time period included a "copper shop," a railroad spur from the nearby BR&P Railroad, and an aboveground storage tank located on the southwester corner of the Olindo parcel.

Underground Storage Tank: A 3,000-gallon storage tank for diesel fuel was located north of the storage building. The steel tank, installed in 1984 with cathodic protection, was pressure tested in 1998 by B&D Tank Testing of Brockport, New York. The pressure test showed no evidence of leaks. The tank was reportedly of single-wall construction and was not equipped with leak detection or overfill prevention. The tank was removed by ESC.
Maintenance Garage: Delivery trucks and sales vehicles are maintained in an onsite maintenance garage. Materials stored in the garage include hydraulic and lubricating oils, windshield washer fluid, and antifreeze. A mineral spirits parts cleaner is located in the garage. The concrete floor in the garage was stained; however, there is no floor drain or hydraulic lift system. Records were not available regarding potential past solvent or oil use in the maintenance garage.
Northern Property Line: Scrap metal and other debris from the adjacent Atkins Waste Materials, Inc., facility are present on the northern portion of the Olindo property.

ESC conducted a Phase II investigation of the Olindo site on January 22, 1999, to evaluate the potential areas of environmental concern identified during the Phase I assessment. The Phase II investigation consisted of the following work:

- Installation of three soil borings (SB-1, SB-2, and SB-4) in the parking lot area to investigate soil and groundwater quality in the area where scrap metal may have been stored by the previous occupants of the site.
- Installation of one soil boring (SB-3) downgradient of the 3,000-gallon underground storage tank to assess the potential for releases from the tank.
- Installation of two soil borings (SB-5 and SB-6) inside the garage to assess the potential for releases of materials used in maintenance activities.
- Installation of two borings (SB-7 and SB-8) along the northern property boundary to assess whether the scrap metal and debris associated with the neighboring scrap metal facility has adversely affected soil quality.
- Collection of two soil samples from each boring for analysis of volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), and Target Analyte List (TAL) metals at a New York State-certified laboratory. The soil samples were collected from the fill material at a depth of 0 to 2 feet bgs, and from the underlying native soil at a depth of 6-8 feet below ground surface. In addition, selected soil samples were screened in the field for polychlorinated biphenyls (PCBs) and one soil sample was submitted to an offsite laboratory for PCB analysis.
- Collection in-situ groundwater samples at locations SB-1, SB-3, and SB-4 for laboratory analysis of VOCs by U.S. Environmental Protection Agency (EPA) Method 8260.
- Collection in-situ groundwater samples at location SB-1 for analysis of total TAL metals by EPA METHOD 6010/700 series and SVOCs by EPA Method 8270.

Soil samples collected from the fill soil in each boring contained SVOCs at concentrations above guidance values for fuel oil contaminated soil as presented in the NYSDEC's Spill Technology and Remediation Series (STARS) Memo#1: Petroleum-Contaminated Soil Guidance Policy, dated August 1992. SVOCs of potential concern

included flouranthene (1,465 to 16,817 µg/kg), chrysene (4,278 to 21,997 µg/kg), and pyrene (1,459 to 27,562 µg/kg). Soil samples collected from the native soil contained non-detectable concentrations of SVOCs.

Soil samples collected from the fill soil also contained several TAL metals at levels above the maximum typical background concentrations found in the eastern United States as presented in the NYSDEC's Technical Administrative Guidance Memorandum (TAGM) 4046, dated January 24, 1994. The TAL metals detected at elevated concentrations included cadmium (1.81 to 920 mg/kg), mercury (2.65 to 3,415 mg/kg), and zinc (540 to 195,306 mg/kg). Magnesium, calcium, and zinc were the only TAL metals detected in the native soil underlying the fill at concentrations above the evaluation criteria. These metals are essential human nutrients and are not likely to pose a concern.

Trace levels of four VOCs were detected in soil samples from both the fill material and native soil at concentrations below the STARS guidance values. The chemical compound benzene was detected in one sample from the fill material at a concentration of 22.7µg/kg, which is slightly above the STARS guidance value of 14 µg/kg. PCBs were not detected in the soil samples submitted for chemical analysis.

The groundwater sample collected from soil boring SB-1 contained benzene (1.2 µg/1) above the groundwater quality standard of 1 µg/1. Total TAL metals, including iron (0.663 mg/1), cobalt (0.039 mg/1), and manganese (5.96 mg/1), were also detected in the groundwater samples at levels above the NYSDEC's water quality standards of 0.3 mg/1, 0.005 mg/1, and 0.3 mg/1 respectively.

4.0 POTENTIAL RECEPTORS

The facility is located in an area zoned for mixed residential, industrial, and commercial use (See Figure 1-Site Vicinity Map). The property is bordered to the east by the Buffalo, Rochester, and Pittsburgh (BR&P) Railroad. The site is bordered to the north by Atkins Waste Materials, Inc., a scrap metal recovery facility. The Olindo Import Foods facility is bordered to the west by Steel Street, and further to the west by residences. To the south of the site lies a small commercial complex housing a Zeibart Tidy Car store, an AFL-CIO facility, and several small offices. The Valeo Automotive facility (formerly the General Motors-Delco Chassis facility) is southeast of Lyell Avenue.

5.0 FUTURE DEVELOPMENT AND PRE-EXCAVATION PLANNING

Future Construction/Design Considerations

Past investigations and laboratory analyses of the ash-fill material on the Olindo site have shown the majority of ash-fill soil excavated in explorations has been characterized as non-hazardous solid waste. However, hazardous waste has also been encountered at several locations. Ash-fill soil waste that is excavated during future

construction, subsurface utility maintenance, or site development, must be properly managed. Design for potential development should be planned to minimize excavation required for construction and anticipate that waste-fill soil that will be handled during excavation and construction activities. The areas of the Site subject to the SMP are presented on Figure 2-Soil Management Plan. The New York State Department of Environmental Conservation (NYSDEC) should be consulted in the event that excavated soil is to be returned to the excavation as backfill. Developers and design engineers for future development should also consider that the following elements of construction may be affected by fill soil waste characterization and soil management:

Basements: It is not recommended that basements be planned for future redevelopment at this site. Slab on grade is the preferred general building type that is suitable for this site.
Schedules: Scheduling of construction will need to allow for potential sampling, monitoring, and management of ash-fill material that is excavated during the course of construction. Sampling, in particular, may lead to laboratory analysis. Analytical results typically take from several days to several weeks to be generated. Therefore, design and construction schedules should allow for adequate laboratory sample analysis turn-around time.
Soil, Waste and Groundwater Variability: Construction schedules should allow contingency time and measures to address potential unanticipated conditions.

6.0 ASH-FILL SOIL CHARACTERIZATION

Pre-Construction Sampling
Data from previous investigations may not be available for the specific location where development or excavations is planned and ash-fill materials may vary considerably from one location to the next over relatively short distances. Therefore, some pre-construction investigation is recommended to characterize the type of fill soil that is expected to be excavated during the actual construction or underground utility maintenance. The overall objective of such characterization is to obtain, observe, and analyze samples that are representative of the ash-fill that will be excavated during construction. This section contains guidance on sampling methods, sample frequency, and laboratory analysis that may be used to characterize ash-fill.

Sampling Methods
Conventional subsurface exploration methods consisting of test pits, test borings, or other methods may be used for sampling ash-fill materials. Overall, the intent of such explorations is to view materials that may be excavated during construction for observable signs of contamination. Such signs typically include:

- Visual observation of ash and cinder fill soils
- Staining
- Fumes or vapors that are detectable by volatile organic compound monitoring instruments

Subsurface explorations are also intended to gather samples that can be used for laboratory analysis for excavation of hazardous waste characteristics. The overall intent of sampling is to obtain a sufficient number of soil samples to be representative of the total mass of material that is expected to be excavated during construction. If laboratory analysis for hazardous waste characteristics show the samples to be non-hazardous, then the ash-fill excavated should be managed on-site. The observations and sample collection described above should be documented on test pit logs, test boring logs, or other field notes by a qualified geologist, soil scientist, engineer, or environmental scientist.

The developer and/or design engineer is cautioned that test pit or test trench type explorations should be limited only to the depth and extent of anticipated construction excavation. Such excavation should not be advanced deeper than anticipated construction excavation, nor should they be placed in areas within the footprint of the proposed structure that is intended to provide future structural support. Excavation and replacement of soil without consideration of the type of material being disturbed, control replacement, and compaction may compromise its potential bearing strength of subsurface soils.

Sampling Frequency:

A representative number of ash-fill soil samples should be collected from the areas that may be excavated during future development or during maintenance of subsurface utilities that require excavation. Collection of soil samples is recommended along proposed foundation elements and underground utilities. Samples may consist of either "grab" samples from discrete sample depth intervals or "composite" soil samples from a range of depths. Grab samples are obtained from a specific location and are representative of the conditions at that location. A composite sample consists of soil collected from several locations that are then combined and homogenized to represent an "average" from the sample locations. Both types of samples may be used for characterizing ash-fill material intended for excavation.

The designer/developer is cautioned that information derived from grab and composite samples may be limited as a result of the method of sampling. Grab samples are representative of a single location and conditions at that location may vary from similar-appearing material located nearby the sample location. Composite samples tend to average conditions from the locations that the composite represents and therefore, may result in laboratory analytical results that dilute elevated contaminant concentrations or obscure non-detect results. These limitations should be considered in developing a sample plan.

Foundations: In general, the New York State Department of Environmental Conservation recommends a frequency of one grab sample per 50 lineal ft. of foundation footer (for slab-on-grade type construction). For typical footer excavation of

4 to 5 ft. in depth, and 4 to 5 ft. width. This represents one sample per approximately 50 in-place cubic yards. If the ash-fill is of consistent character, i.e. color, odor, grain size, depths, etc. it may be possible to collect samples for a larger volume of soil than 50 cubic yards. Contact the NYSDEC Region 8 office, Division of Environmental Remediation for additional assistance at (585) 226-2466. Disposal facilities (landfills) will also have testing requirements for volumes of contaminated soil before they will accept the soil.

Building Column Supports: If column foundations, grade beams, or other structural supports are intended for the proposed building footprint, and these elements will require excavation, sampling is also recommended at these locations. Such sampling may consist of periodic grab samples (for example: one grab sample for every third column) or as composited samples (for example: one composited sample derived from three to four adjacent column footer locations).

Sample Integrity: The number of samples, sampling schedule, and intended analyses should be coordinated with a qualified environmental laboratory so that appropriate sample containers, preservation methods, shipping, and holding times may be observed. Several qualified environmental analytical laboratories are present in the Rochester area that are capable of supporting this type of work.

Generally, sample collection will require use of dedicated stainless steel collection implements (trowels or spoons to place samples in jars). If dedicated sampling equipment is not available, sampling implements will need to be cleaned and properly decontaminated between samples locations. For the types of materials that have been encountered in previous Olindo site investigations, decontamination using an alconox/water wash and deionized water rinse is generally adequate. However, specific procedures should be reviewed with the analytical laboratory prior to collection and submittal of samples.

Sample Analyses:

The intent of laboratory analysis of samples is to determine whether the ash-fill soil excavated is hazardous or non-hazardous. By USEPA and NYSDEC regulation a generator of such ash-fill is allowed to make this determination using knowledge (characterization) of the ash-fill and/or laboratory analysis.

Generally the ash-fill material excavated at the Olindo site will be considered non-hazardous solid waste provided laboratory analysis does not show it to be a "Characteristic Hazardous Waste". Please note that "Characteristically Hazardous" and "Listed Hazardous Waste" are both defined terms within USEPA and NYSDEC regulation.

Ash fill soil will be considered hazardous if it exhibits a Hazardous Characteristic, namely, ignitability, corrosivity, reactivity, or toxicity. If a Listed Waste is encountered

within the solid waste sample, the mixture may also be considered as hazardous waste. Therefore, laboratory analysis should consider analysis for hazardous waste characteristics.

If it is determined that listed waste is present in the excavated soil, the NYSDEC's Technical Administration Guidance Memorandum No. 3028 of November 30, 1992, "Contained-In" Criteria for Environmental Media, provides guidance on how the listed waste may be managed.

Past analyses from the Olindo site have generally identified waste as hazardous when they exhibit a hazardous waste characteristic by toxicity test (see below). In most cases, it should be possible to limit laboratory analyses for waste to be excavated during site development to the following parameters:

- Hazardous Waste Characteristics:
  Ignitability (liquids only)
  Corrosivity (liquids only)
  Reactivity
  Toxicity (see next item)
- Hazardous Waste Characteristic of Toxicity-this analysis is performed by using the Toxicity Characteristic Leaching Procedure (TCLP).
- Volatile Organic Analysis-by EPA Method 8010/8020 or 8240

However, GeoQuest's identification of wastes as hazardous was based upon the NYSDEC calculation for the maximum possible contaminant concentration in the extract liquid. This value is calculated, without conducting laboratory TCLP analysis, by dividing the contaminant concentration in soil by 20.

Toxicity Characteristic Leaching Procedure (TCLP) has not been analyzed to date for characteristics of ignitability, corrosivity or reactivity to be present. Potential leachability of heavy metals has been the primary reason that a sample may be characterized as hazardous waste by the TCLP procedure. Therefore, it may be possible to limit TCLP analyses to metal constituents. If there is suspicion that volatile organic compounds (VOCs) are present, then it would be appropriate to also include the VOC constituent portion of the TCLP analyses. The developer/designer should consider past site information and these factors in planning lab analyses.

Volatile analyses would be appropriate and should be performed if VOC presence is suspected based on observable odors, sheens, staining, or positive detections by field VOC-monitoring equipment.

Disposal facility (landfill) requirements for analysis should also be determined when sampling the excavated soil, particularly the requirements for non-hazardous waste landfills as these usually have the most stringent analytical requirements.

7.0 CONSTRUCTION SAMPLING

Sampling of excavated ash-fill materials during construction should be considered if either of the following conditions exist:

- Pre-construction sampling was not performed.
- If subsurface conditions encountered during actual construction are significantly different than those observed during pre-construction sampling and exploration.

The recommended frequency of sampling during construction (if not otherwise done before construction) should follow the guidelines of sample frequency described above or designed for a specific development plan.

8.0 HEALTH AND SAFTEY MONITORING

Monitoring for health and safety during excavation for construction or subsurface utility maintenance is generally required for three general purposes:

- Protection of health and safety of site workers during construction.
- To make heath and safety modifications in the event that subsurface conditions are not consistent with the pre-construction characterization (sample results).
- Monitoring the downwind site parameter for detection of potential off-site health and safety impacts.

Past investigations of the Olindo site have shown that hazardous soils may potentially be encountered during subsurface exploration or construction activities. These include soils that could be associated with the ash-fill contained at the Olindo site. Generally materials that are associated with the Olindo site ash-fill soils that may be considered as potential hazardous waste subject to health and safety planning may include:

- Semi-Volatile Organic Compounds (SVOCs)- these include petroleum-derived constituents (Poly Aromatic Hydrocarbons or PAHs).
- Heavy Metals from Ash-Fill - several heavy metals are present in detectable concentrations in the ash-fill including chromium, cadmium, lead, and mercury. Health and safety planning should generally consider measures to prevent exposure to heavy metals though engineering controls (dust suppression) or use personnel protective equipment, or other measures.
- Polychlorinated-Biphenyl (PCBs)
- Volatile Organic Compounds (VOCs)- these include petroleum-derived constituents.

Health and safety planning should also give consideration to other construction related issues, such as but not limited to trenching safety (as is required under OSHA regulations 29 CAR 1910.1926), or other construction-related OSHA regulations.

Overall, it is recommended that basic health and safety planning be performed and that a written plan be developed for construction activities based on sample analytical results, information specific to the potential future development, specific construction tasks to be performed, and the potential for exposure for site workers. This plan should be review by the NYSDEC. Previous investigations and construction activities have

routinely been performed. These previous activities have shown that overall, the potential for worker exposure is relatively low. However, all contractors and developers should consider the need for heath and safety planning relative to their specific development or subsurface maintenance, and planned activities for each task.

Ash-Fill Characterization:

Monitoring of ash-fill excavated during future construction or subsurface maintenance should be performed for two reasons:

- To determine that the ash-fill actually excavated during construction or maintenance activities is consistent with the characterization of ash-fill developed prior to field project work.
- To allow characterization of the non-hazardous or hazardous nature of ash-fill excavated in the event that pre-construction planning and soil analysis was not performed.

Monitoring should generally consist of documentation of the same types of observations as those recommended for pre-construction characterization. Namely, observations documented during excavation should include visible characteristics of the ash-fill excavated including color staining, observable odors, or other indicators of contamination.

Several portable monitoring instruments are also available to assist in field monitoring of excavated soils. Such instruments are primarily used for detection of volatile organic compounds. Since such compounds have been detected in the past at the Site, this instrumentation is also appropriate for construction excavation monitoring. Types of instruments available for this purpose include:

- Photoionization detector instruments (PID) – This instrument measures total organic vapors and operates by drawing a sample of ambient air or gas into a chamber where the gas is ionized using light source of a specific energy (either 10.2 or 11.7 eV). The intensity of ionization energy is then measured and converted to a signal and a scale reading in parts-per-million (ppm) of total volatile organics concentration.
- Flame ionization detector instruments (FID) – This instrument measures total organic vapors and operates on a similar principle as the PIDs. However, the ionization is caused by a flame produced from a controlled gas source.
- Colorimetric tubes – these are small glass tubes which contain chemical salts formulated to react with specific volatile and some non-volatile compounds. A sample of air is drawn through the tube. The presence of a target chemical causes a reaction and a color change of the chemical salts in the tube. A scale on the side of the tube indicates the apparent concentration of the gas sampled, usually in ppm.

These instruments are generally available in the Rochester area and can be rented from several sources. They should be operated by individuals trained and experienced in their use, limitations, and capabilities for data generation.

Any readings generated from such monitoring instruments should be recorded in the field along with the other observations described above. As long as excavation monitoring shows ash-fill material to be consistent with pre-construction characterization, then the ash-fill soil should be managed as determined prior to construction. If subsurface conditions materially different than those anticipated are encountered, then sampling and additional characterization as described above may be necessary. The Health and Safety plan may be revised to reflect the changes observed in the subsurface.

9.0 ON-SITE MANAGEMENT OF SOLID WASTE

As indicated above, solid waste (ash-fill soil) excavated as part of a construction project may be maintained and replaced on-site with similar materials, or otherwise within the Site. Accordingly, site development plans and designs should allow for placement of the waste-fill as backfill and subsequent grading and covering of the material with soil and vegetation, or a structure (building, parking lot, etc.). The objective of placing a cover or a cap over the solid waste material is to prevent physical contact with the ash fill waste and impede rain water infiltration to site soils. Therefore coverage should generally consist of approximately 24 inches of clean soil cover and vegetation, or a substantial barrier consisting of concrete slab, the building slab, or asphalt cover. A 24 inch cover meets the minimum cover thickness criteria for ash monofills specified in NYSDEC's Part 360. As with the Health and Safety Plan, the backfill grading, and cover plans should be reviewed by the NYSDEC before beginning work.

Approximate measures to consider in soil management should include a possible need to temporarily stockpile excavated solid or hazardous waste and measures to prevent its contamination of other site materials. Measures to consider for such control include:

- Stockpile locations away from storm sewers, downwind property boundaries, and drainage courses.
- Placement of stockpiles on impervious material (plastic) with perimeter berms.
- Covering stockpiles or exposed soil waste (impacted soils) areas to prevent migration by wind-blown dust or storm water runoff until final placement of backfill, building structure, or final cover is completed.

A Clean Access Area should be established during soil management activities. Due to the potential of encountering subsurface contamination during excavation activities, a "clean" transition area will be established at various locations for access/egress to specific work areas. The "clean" area will be used for equipment/material deliveries, and loading of any contaminated material for off-site treatment or disposal. The type of "clean" area will vary depending on the anticipated level of contamination, location of the work area, and the type of work to be completed at the location.

10.0 OFF-SITE DISPOSITION OF SOLID OR HAZARDOUS WASTE

Off-site disposal of excavated ash-fill soil will be required if quantities of soil cannot be used on site. On-site use of ash-fill as backfill is subject to being placed within the confines of the property, and will require permission of the NYSDEC, Monroe County Department of Health, and the New York State Department of Health.

As indicated previously, it is possible that hazardous waste could be encountered during future site development and subsurface utility maintenance. If such hazardous waste soil is encountered and excavated, it will be the responsibility of the site developer or owner (as the generator of the hazardous waste) to properly handle this waste. Management of such hazardous waste will require characterization, management, and off-site disposal at an appropriate approved facility, consistent with NYSDEC and USEPA hazardous waste management regulations.

11.0 STORMWATER MANAGEMENT AND DEWATERING

11.1 Stormwater Management and Control

Construction activities may include subsurface utility installations and electrical ductbanks and manholes, sheeting, piling, and the installation of new building and equipment foundations. During these activities and others which may impact stormwater runoff, stormwater management/sediment and erosion controls and discharge and necessary treatment will be installed.

In addition to the stormwater management and control measures specified in this Soil Management Plan, other local, state, and federal regulations may apply.

11.2 Stormwater Run-off

Stormwater run-on will be controlled during excavation activities through diversion to surface swales away from excavations. Run-on shall be diverted from entering the excavations through the construction and maintenance of soil berms wrapped with liner at the limit of excavations, deflecting flows which are not impacted by construction or excavation activities to surface swales or natural drainage areas, or other equally effective methods.

As noted previously, all excavated material will be staged and shipped off-site for disposal.

- **Soil Staging Area** – The soil staging area will be constructed to prevent excavated material and runoff from entering surrounding areas. A sump pit should collect all runoff from the staging area. Sediment collected in this sump will be added to stockpiled soils. Waters collected in the staging area

sumps will be pumped to water storage tanks, treated if required, and disposed of off-site.

- **Erodible Soils** – The removal of existing ground cover may expose erodible soils or fill. During construction activities, dust control measures will be implemented if required. Any landscaped areas disturbed during the project period will be treated in the appropriate manner by the placement of seed and mulch for grass areas.
- **Temporary Measures** – The construction contractor will implement temporary stormwater control measures when erosion channels have formed and/or measurable sediment deposits have washed into low-lying areas. The construction contractor will utilize such temporary stormwater control measures as silt fencing, diversion dikes, check dams and/or temporary seeding to provide effective stormwater management.
- **Mechanical Retardation and Control of Runoff** – The construction contractor will install temporary diversion dikes to prevent storm water runoff from excavated or disturbed soil areas within the project area.
- **Vegetation and Mulch** – Soil exposed during construction activities that will not have an impervious layer applied will be covered by grass seeds and mulch, or crushed stone upon completion of the project.

11.3 Dewatering Excavations During Construction Activities

The construction contractor should, to the greatest extent possible, prevent water resulting from precipitation from entering open excavations through the use of earthen berms, swales, or sedimentation basins. Any water that enters an open excavation will be classified and handled as contaminated water requiring treatment prior to discharge or disposal. Water that collects in the excavations as a result of groundwater intrusion shall be pumped from excavations as necessary when it impedes excavation, sampling, or affects the ability to achieve compaction of backfilled soils.

Water pumped from excavations will be discharged to temporary holding tanks or sedimentation basins. The collected water will be sampled, treated if necessary, and disposed of off-site in accordance with all applicable standards.

11.4 Equipment Decontamination Water

Water utilized for decontamination of equipment shall be supplied by fire hydrants located on-site, potable water from the City, or potable water from another off-site source.

All water utilized in equipment decontamination shall be treated off-site and discharged in accordance with all applicable standards. The construction contractor will set up portable decontamination stations to decontaminate heavy equipment or parts of heavy equipment (e.g., excavator bucket) at specific work areas.

12.0 SOURCES OF INFORMATION AND AGENCY CONTACTS

Environmental Strategies Corporation, Phase I Environmental Site Assessment, Olindo Import Foods, Inc., January 1999.

Environmental Strategies Corporation, Phase II Environmental Site Assessment, Olindo Import Foods, Inc., January 1999.

Environmental Strategies Corporation, Summary of Supplemental Investigations, Olindo Import Foods, Inc., February 23, 2001.

New York State Department of Environmental Conservation, October 9, 1993. Title 6 of the New York State Official Compilation of Codes, Rules, and Regulations (6 NYCRR), Part 360 – Solid Waste Management Facilities.

New York State Department of Environmental Conservation, Title 6 of the New York State Official Compilation of Codes, Rules, and Regulations (6 NYCRR), Part 371, Identification and Listing of Hazardous Wastes.

New York State Department of Environmental Conservation, November 30, 1992. Technical Administrative Guidance Memorandum No. 3028, "Contained In" Criteria for Environmental Media.

New York State Department of Health.....(585) 423-8034

Monroe County Department of Heath.....(585) 274-6000

New York State Department of Environmental Conservation.....(585) 226-2466

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Checked By:	SJD - GeoQuest Environmental, Inc.
Status:	Final
Date:	6/20/03

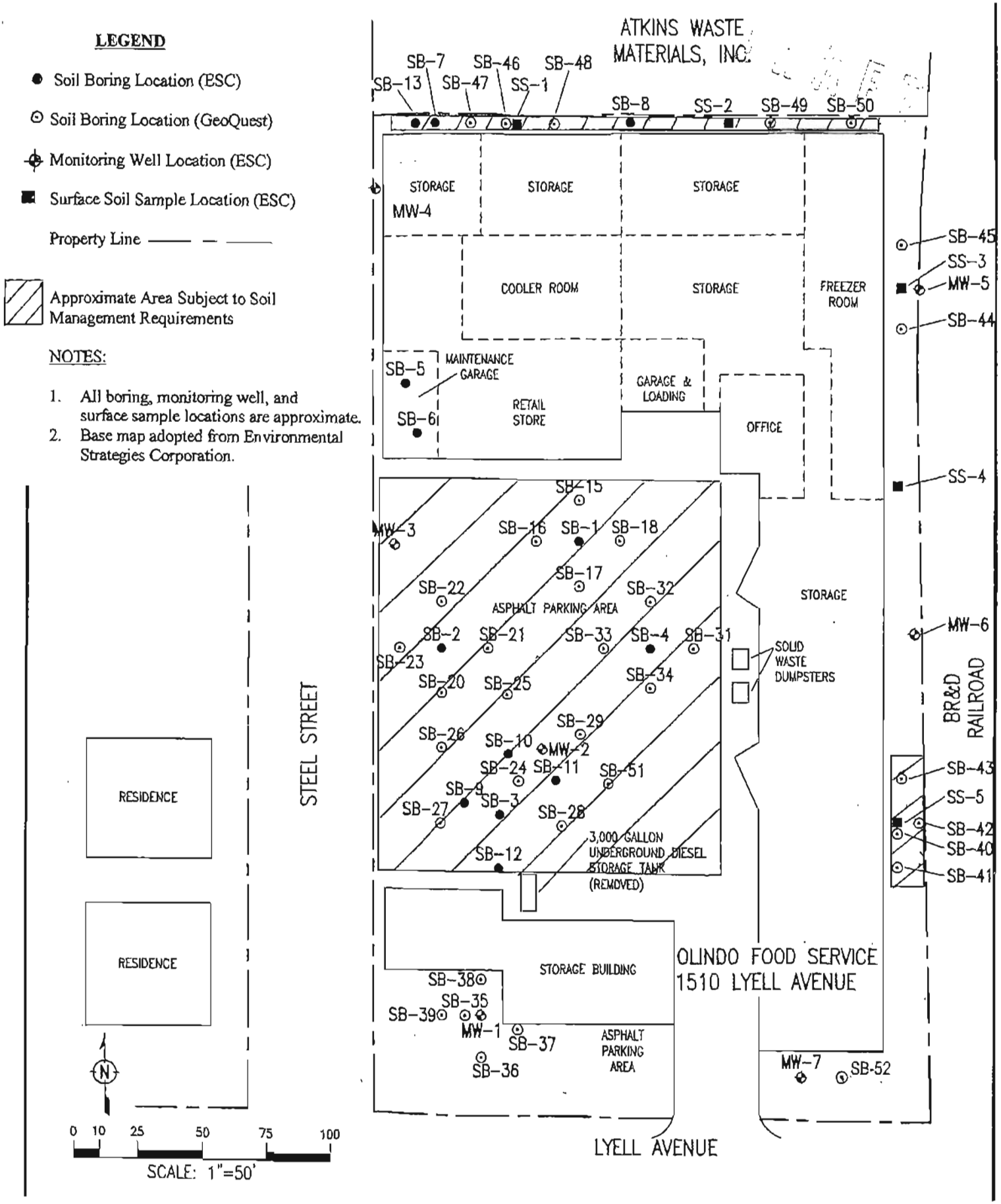
Rev	Description	Date	By

PROJECT TITLE:
Soil Management Plan
Olindo Import Foods, Inc.
1510 Lyell Avenue
Rochester, New York
Site # V00217

DRAWING TITLE:
Vicinity Map

Project Number
51502

Drawing Number
Figure 1



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Drawn By:	KAT - GeoQuest Environmental, Inc.
Checked By:	SJD - GeoQuest Environmental, Inc.
Status:	Final
Date:	6/24/03

Rev	Description	Date	By

PROJECT TITLE:
Soil Management Plan
Olindo Import Foods, Inc.
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DRAWING TITLE:
Area Subject to Soil Management Requirements

Project Number
51502

Drawing Number
Figure 2