

February 15, 2008

FEB 21 2008

Mr. Scott Deyette  
New York State Department of Environmental Conservation  
625 Broadway  
Albany, New York 12233-7014

**Re: Malone (35 Amsden Street) Sanitary Sewer Proposed Access Roadway/Soil Management Plan**

Dear Scott:

Please find a revised Soil Management Plan (SMP) enclosed for your review and approval. The SMP has been revised in accordance with your comments provided to me via e-mail on 2/14/08.

National Grid is in the process of designing the access roadway, and would like to implement construction during the 2008 construction season. Upon completion of the draft design, National Grid will schedule an on-site meeting with the Village and NYSDEC to discuss the project. I look forward to your final approval of the SMP.

Please contact me at (315) 428-5652, or [steven.stucker@us.ngrid.com](mailto:steven.stucker@us.ngrid.com) if you have any questions or need additional information.

Sincerely,



Steven P. Stucker  
Senior Environmental Engineer

Cc w/o encl.:

William Holzhauer –National Grid

Cathy Geraci (letter only)

Megan Ross-TRC

Nathan Race -Village of Malone Attorney

Rich Burns-National Grid

## **SOIL MANAGEMENT PLAN**

### **Malone Former Manufactured Gas Plant Site**

#### **1.0 Introduction**

This plan is intended for use by the Village of Malone during maintenance or construction-related activities performed at the Malone Former Manufactured Gas Plant (MGP) site (Site) located at 35 Amsden Street (Figure 1). Specifically, any potentially intrusive activities planned or performed on the existing National Grid-owned property, defined herein as the **Controlled Area**, must be performed in accordance with the provisions of this plan. Intrusive work is considered any activity that involves active disturbance of Site soils, including excavation, trenching, regrading, drilling, or other activities that may disturb soil below ground surface or penetrate below existing pavement or graveled surfaces and any associated filter fabric or visual barriers. It is also noted that this site is listed on the New York State Department of Environmental Conservation's (NYSDEC) Registry of Inactive Hazardous Waste Disposal sites, and is being addressed by National Grid under a Voluntary Cleanup Order (VCO) (Index Number DO-0001-0011) entered into between National Grid and the NYSDEC.

Previous site characterization activities at the Site have confirmed the presence of various constituents of concern (COCs) associated with former gas manufacturing operations. Those COCs have been detected in Site surface soils, subsurface soils, and ground water. Specifically, this plan is intended to provide specific soil management procedures to be implemented by employees and subcontractors of the Village of Malone (Village), to ensure proper management of Site soils and prevent their exposure to site contaminants. This plan covers the appropriate notification, precautions, and procedures to be implemented to be protective of both human health and the environment.

In addition to intrusive work activities planned within the **Controlled Area**, due to the potential presence of MGP constituents outside of the fenced area, it is recommended that the procedures and precautions described in this plan also be followed for all potentially intrusive work performed in proximity to the **Controlled Area**.

#### **2.0 Training and Planning Requirements**

The procedures summarized in this plan are intended to protect both Site workers and local receptors (e.g., Site visitors, nearby residents, etc.) during performance of intrusive sanitary and storm sewer maintenance-related work on and adjacent to the Site. The procedures summarized herein are **mandatory** for all intrusive work performed on the National Grid-owned property. Due to the confirmed presence of MGP-related contaminants within the **Controlled Area**, any intrusive work performed in that area must be performed under an appropriate site-specific, Certified Industrial Hygienist (CIH)-stamped Health and Safety Plan (HASP). The Village is responsible for the development of the HASP, which

must be submitted to National Grid for review and approval prior to initiation of any work within the **Controlled Area**. National Grid will provide the necessary Site-specific information (e.g., detected levels of contaminants of concern, site plans, etc.) to assist in the development of the HASP. The HASP will also need to include a community air monitoring plan (CAMP) which complies with the New York State Department of Health (NYSDOH) requirements.

Furthermore, any such intrusive work performed within the **Controlled Area** must be performed by workers who have received 40-hour OSHA Hazardous Waste Operations and Emergency Response training (under 40 CFR 1910.120) and are current with annual 8-hour refresher training. Evidence of the necessary training and associated certifications (e.g., annual physical examinations) for the specified Site workers must be provided to National Grid prior to initiation of subject work activities within the **Controlled Area**.

Further, where appropriate, additional methods and/or procedures that are needed to perform a specific intrusive task in accordance with good environmental practices, and in accordance with the regulations will be developed and implemented.

### **3.0 Notification**

Advance notification must be provided to National Grid whenever *intrusive* work is planned within the **Controlled Area**. Notification must be provided a minimum of five (5) business days prior to the planned performance of any non-emergency work. In addition, notification must be provided to National Grid at the time of any emergency work that will occur/is occurring in the **Controlled Area**. Workers are to be provided with reasonable notice and sufficient preparation time, and the work is to be performed in compliance with the provisions of this Plan so that any existing Site Controls, such as pavement or soil caps, are maintained. National Grid will have a representative on-site, as appropriate, during any work activities in order to ensure compliance with the plan.

### **4.0 Soil Management Procedures**

In general, excavated soils are to be returned to the excavation upon completion of the work unless the material is determined to be unsuitable for reuse, or the material is considered surplus upon completion of the work. Material may be considered unsuitable due to its physical (e.g., geotechnical) or chemical (e.g., contamination) characteristics. For all work performed in the **Controlled Area**, such material is to be managed, tested, stockpiled, and secured for final disposition by National Grid. Surplus soils generated from work outside of the **Controlled Area** will be managed and disposed of by the Village, unless MGP-related impacts are detected in that material. This section presents the specific soil management procedures to be implemented during planned intrusive work in the **Controlled Area**. These procedures may also be considered appropriate for work in close proximity to, but outside of, the **Controlled Area**:

**1. Pre-Mobilization** - Prior to the start of any planned soil disturbance, removal, or excavation activities in the **Controlled Area**, the National Grid Environmental Department Site Investigation and Remediation (SIR) Group must be notified of the planned work location(s), the expected volume of soil to be excavated, the means and methods for the proposed staging, and the ultimate planned disposition of those soils. Notifications and approvals are to be secured prior to the initiation of the work.

**2. Erosion and Sedimentation Controls** – The activities that are subject to this plan must be performed in a manner that is protective of workers and receptors in the vicinity of the site. Potential concerns include, but are not limited to, distribution of site contaminants associated with storm water runoff impacts to the adjacent Salmon River, worker direct contact to Site contaminants, fugitive dust and/or vapor emissions on- and off-site, and tracking or carry-off of contaminated soils by construction equipment or personnel. Appropriate controls must be instituted to prevent off-site transport of site contaminants during and following the planned work. Specifically, appropriate erosion controls must be established in the planned work area prior to intrusive activities. Appropriate controls may include silt fences and/or hay bales located to intercept potential surface runoff.

**3. Dust and Vapor Suppression** - If necessary, water spray and/or vapor suppression agents (e.g., Biosolve™) are to be used to suppress dust and/or vapor emissions during the work. Other potential suppressive measures include prompt backfilling of excavation areas and the use of plastic sheeting to cover active excavation areas, disturbed ground surface areas, and/or soil stockpiles. Effective suppression systems must be present on-site during the active work, and implemented when deemed necessary. Additional dust/vapor suppression monitoring and procedures are to be specified in the HASP.

**4. Personnel and Equipment Decontamination** - Personnel and equipment decontamination are to be performed in accordance with the HASP. An established equipment decontamination location shall be designated. All personnel and equipment are to be decontaminated before leaving the **Controlled Area**, with particular care to prevent distribution to other parts of the **Controlled Area**. All potentially impacted equipment is to be decontaminated prior to removal from the Site. All residual materials are to be cleaned up prior to the completion of work at the end of each working day and containerized or otherwise managed to prevent subsequent dissemination. Wastewater generated by equipment decontamination will be containerized in drums or portable tank, and stored in the vicinity of the decontamination area. National Grid will take responsibility for testing and disposal of all MGP-related decontamination wastewater. Additional decontamination procedures are to be specified in the HASP.

**5. Cessation of Operations** - Activities are to cease and the National Grid Environmental Department is to be contacted immediately if any of the following occurs during work performed in the **Controlled Area**:

- Discovery of a drum, tank, or other similar product or waste container;
- Discovery of soils that are grossly contaminated with MGP-related or other wastes;
- Discovery of conditions that significantly impede/change the scope of the work;

- Difficulty in controlling the activities in accordance with the provisions of this Plan.

In addition, similar discoveries outside of the **Controlled Area** should also be immediately reported to National Grid if they are suspected to be associated with former MGP Site operations. In those cases, National Grid will evaluate the physical findings to determine if they appear to be related to the former MGP. When appropriate, National Grid will require sampling and analysis of representative samples of suspect materials to determine their composition and origin. It is National Grid's intention to collect appropriate samples of the material for fingerprint analysis by an experienced analytical laboratory, to determine the original source. In the event the suspect material found outside the **Controlled Area** is determined to be related to the former MGP, National Grid will take responsibility for the characterization and disposal of that material. However, the Village will be responsible for relocation of that material to the established waste storage area on-site and management of that material in accordance with the procedures specified in this plan.

**6. Soil Storage** - Excavated soil is to be stored in the designated portion of the Controlled Area (Figure 1) in accordance with the applicable regulations and in a manner that will minimize potential exposure to workers and receptors. The preferred method of storage for small volumes of material is to containerize the soil in DOT rated steel drums that are suitably protected from the weather. If necessary, larger volumes of soils may be stockpiled on and covered with minimum 6-mil polyethylene sheeting to minimize potential erosion/run-off, contaminant volatilization, and/or fugitive dust emissions. The sheeting cover must be properly secured and possess the necessary physical strength to resist deterioration due to the elements. If the cover does become damaged or displaced, it must be replaced and/or secured, as necessary.

The polyethylene sheeting liner that is emplaced beneath soil stockpiles must be of sufficient thickness alone, or in combination with a layer of clean stone or soil, to withstand normal soil handling operations without damage to its integrity. Movement of the stockpiles should be minimized to the extent possible to prevent damage to the liner/cover.

**7. Soil Reuse** — If excavated soil is not visually impacted with MGP-related or other contaminants, and other field screening methods (e.g., photo-ionization detector) do not indicate the presence of contaminants, the excavated material may be returned to the original excavation(s) in accordance with discussions with the NYSDEC, and National Grid waste management protocols. In addition, any imported backfill must be chemically tested in advance, and approved by National Grid.

When being backfilled, the soil is to be placed and compacted with a flat plate vibratory compactor in 12-inch lifts. If the soil is deemed unsuitable for backfilling and compaction (as discussed previously), it must be removed from the Site, or if approved by National Grid, transferred to the specified storage area. If

the quantity of reusable soil is insufficient to completely backfill the excavation area, additional soil is to be obtained from a certified source for suitable, clean sand and/or gravel fill.

**8. Restoration of Engineering Controls** - In the event that pavement removal is required to enable excavation of underlying soils in the **Controlled Area**, or if the pavement is otherwise damaged during Site operations, the pavement must be restored. Restoration must be performed using equivalent materials (asphalt or concrete) and construction (i.e., thickness) and the new material adequately bonded to the adjacent, existing pavements.

**9. Waste Water and Soil Transportation and Disposal** – Excess water and soil generated outside of the **Controlled Area** will be the responsibility of the Village for disposal, unless the material has been confirmed to be impacted with MGP residuals. Disposal of confirmed MGP impacted water and soils will be the responsibility of National Grid. No soil shall be sent off-site for disposal without prior chemical characterization.

**10. Demobilization** - Upon completion of the project within the **Controlled Area**, the Village will ensure that all associated waste soils, waste water, and other residuals that are the responsibility of National Grid, are properly stored. In addition to the installation of liner and covering of all remaining soil stockpiles, appropriate erosion and sedimentation controls must be installed to minimize the potential for releases. Disturbed areas must be restored in a suitable manner that is consistent with the surrounding area and does not limit or otherwise obstruct continued Site use or access. Finally, all other materials that are the responsibility of the Village must be removed from the **Controlled Area** at the time of final demobilization.

Estimates of the remaining types and quantities of waste materials must be determined prior to demobilization from the Site, and the information provided to National Grid within one week of final demobilization.