



July 2, 2018

Mr. Frank Sowers
New York State Department of Environmental Conservation
Region 8
6274 East Avon-Lima Road
Avon, NY 14414

Subject: CSX Transportation, Inc. (CSXT)- River Street Derailment Project
480 River Street
Rochester, New York
NYS DEC V00524
CSXT Project Number: 0200358
AMEC Project Number: 64300-8511

Dear Mr. Sowers:

AMEC E&E PC (AMEC) has prepared this Periodic Review Report (PRR) and the required associated certification forms (Attachment A), on behalf of CSX Transportation, Inc. (CSXT), for the CSXT-River Street Derailment Site located in Rochester, New York.

BACKGROUND

On December 23, 2001, at 3:40 PM EST, a CSXT train derailed 27 of its cars (24 hoppers loaded with coal, 2 tank cars loaded with acetone, and 1 tank car loaded with methylene chloride). As a result of the derailment coal, 3,000 gallons of diesel, 14,000 gallons of acetone, and 16,000 gallons of methylene chloride were released to the environment, including the Genesee River. CSXT entered the Voluntary Cleanup Program and was assigned site number V00528-8.

Following the emergency response, interim remedial measures were initiated to address the landside and Genesee River impacts. These activities included the excavation (using traditional methods and sheet piling cells) and disposal of 1,700 tons of petroleum impacted soil, 28,000 tons of methylene chloride and/or acetone impacted soil, and collection and disposal of 1.4 million gallons of impacted groundwater. CSXT also completed the installation of temporary drinking water lines and the replacement of over 300 feet of sanitary sewer. In order to address the sediment impacts in the Genesee River, CSXT installed a sheet pile wall and dredged 3,000 tons of impacted sediment.

Subsequent subsurface investigation events included a soil gas survey, soil sampling, installation of monitoring wells and soil borings. Based on the results of the subsurface investigation events and interim remedial measures, residual impacts were known to exist in the landside soils and Genesee River sediment. Supplemental treatment via EHC-O™ injections were used to fully remedy the landside site soils to below calculated recommended soil cleanup objectives. A Site Management Plan was prepared to address the limited riverside residuals.

CSXT received a release and covenant not to sue from the New York State Department of Environmental Conservation (NYSDEC) in December 2010.

AMEC E&E, PC
453 Route 146, Suite 201
Clifton Park, NY 12065
Tel (518) 372-0905
Fax (518) 372-1042

SITE MANAGEMENT PLAN

As mentioned previously, a Site Management Plan (SMP) was drafted to address the residual impacts in the remaining sediment hot spots within the Genesee River from the December 23, 2001 derailment. The document summarizes the site background; describes the historical field activities, the interim remedial measures, and subsequent monitoring events; and details the institutional controls to address the residual impacts in the remaining sediment hot spots.

The SMP intent is to provide guidance in the management of sediment containing methylene chloride and acetone above the site-specific cleanup levels of 773 ug/kg for acetone and 1,133 ug/kg for methylene chloride that may be disturbed in the unlikely circumstance that the United States Army Corp of Engineers (USACE) dredging limits are revised or if future development activities by the City of Rochester disturb river sediments within the interim remedial measure dredging limits.

An updated SMP was supplied with the 2012 PRR.

VERIFICATION OF POTENTIAL SEDIMENT DISTURBANCES

The property contained in the SMP area is wholly within the Genesee River as shown in Figure 2 of the SMP in Attachment B. The first approximately 20-feet of the riverbed immediately adjacent to the western bank of the River is owned and maintained by the City of Rochester. The additional area between the City owned land and the navigational channel would most likely be disturbed by the City during the maintenance of their boat slips. The USACE maintains the navigational channel that makes up the remainder of the SMP area.

AMEC, on behalf of CSXT, contacted both the City of Rochester, Mr. Joseph Biondolillo, and the USACE, Mr. Michael Asquith, to determine if either entity had plans to implement dredging or other activities that may disturb the sediments within the SMP area.

The City indicated they will be completing activities (i.e. sounding) in 2018 and 2019 to determine river depth information and the need for dredging to maintain the boat slip areas. The City indicated no dredging activities, development, or maintenance of boat slips have occurred over the last 5 years. Mr. Biondolillo indicated the City is aware of the SMP and understands the protocols of the SMP.

Additionally, the City is aware that CSXT utilized a stone backfill to cap the SMP area up to the limit of the navigational channel and that if they happened to encounter this material during maintenance dredging of the accumulated sediments or during the deepening of the boat slips that that would indicate they were approaching the SMP sediments and to immediately contact CSXT to implement the SMP protocol.

The USACE indicated they have not completed maintenance dredging activities over the last 5 years; however, EssRoc (a private cement company) was permitted to dredge in the navigational channel in 2014 and 2015 with USACE support. The USACE provided a site figure depicting the 2014 and 2015 dredging activities, as well as two cross-sections of the 2014 dredging activities. The figure indicates the dredging in 2015 did not extend into the SMP area; dredging was completed east of the SMP area, and Mr. Asquith verbally confirmed this

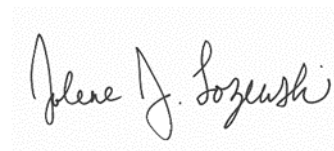
information. Two cross-sections of the 2014 dredging activities were reviewed. The cross-sections correspond to the northern and southern boundaries of the SMP area, and provide pre-dredging depths and post-dredging depths and extent. Amec's review of these cross-sections verify dredging was completed east of the SMP area, and did not extend into the SMP area. Mr. Asquith was unable to provide associated permits, or public notices as the work was completed by EssRoc. The USACE also indicated they plan to complete maintenance dredging activities within the Federal Channel beginning May 1, 2019, and that plans have not yet been developed and permits have not yet been submitted.

Mr. Asquith was provided the SMP to confirm the USACE's understanding of the protocols, however, he would not confirm understanding and indicated he would provide the information to their legal department for review and response. On June 21, 2018, Mr. Asquith indicated he had consulted legal, and the department advised him not to confirm an understanding of the SMP. However, Mr. Asquith inquired as to whom should be notified if future dredging activities are planned, and verbal confirmation was made that Amec and CSX are to be notified when plans are initiated. He further indicated "the USACE reserves the right to dredge the Federal channel in the given area to a depth of ~22' LWD (authorized channel depth plus one additional foot of over depth".

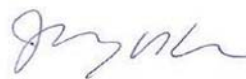
Should you have any questions regarding the enclosed information, please do not hesitate to contact me at 518 372 0905.

Jeffrey Sotek, P.E.
Branch Manager
AMEC E&E PC.
7 Southside Drive, Suite 201
Clifton Park, NY 12065
Phone: 518-372-0905
Fax: 518-372-1042
jeff.sotek@amecfw.com

Sincerely,
AMEC E&E PC



Jolene Lozewski, PG
Staff geologist



Jeffrey Sotek, PE
Branch Manager

Attachments: A Certification Forms
B Figure 2 from Site Management Plan- June 2012

ATTACHMENT A

Certification Forms



Enclosure 2
NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
Site Management Periodic Review Report Notice
Institutional and Engineering Controls Certification Form



Site Details

Box 1

Site No. **V00524**

Site Name **CSXT - Rochester NY**

Site Address: 480 River Street Zip Code: 14612-
City/Town: Rochester
County: Monroe
Site Acreage: ~~1.7~~ **XXX** 0.5-acres for Site Management Plan Area

Reporting Period: May 31, 2013 to May 31, 2018

YES NO

1. Is the information above correct? ☐ ☒

If NO, include handwritten above or on a separate sheet.

2. Has some or all of the site property been sold, subdivided, merged, or undergone a tax map amendment during this Reporting Period? ☐ ☒

3. Has there been any change of use at the site during this Reporting Period (see 6NYCRR 375-1.11(d))? ☐ ☒

4. Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property during this Reporting Period? ☒ ☐

EssRoc reportedly submitted permits to the NYSDEC in 2014 and 2015; however, this information could not be provided.

If you answered YES to questions 2 thru 4, include documentation or evidence that documentation has been previously submitted with this certification form.

5. Is the site currently undergoing development? ☐ ☒

Box 2

YES NO

6. Is the current site use consistent with the use(s) listed below? ☒ ☐
Unrestricted, Residential, Restricted-Residential, Commercial, and Industrial

7. Are all ICs/ECs in place and functioning as designed? ☒ ☐

**IF THE ANSWER TO EITHER QUESTION 6 OR 7 IS NO, sign and date below and
DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue.**

A Corrective Measures Work Plan must be submitted along with this form to address these issues.

SITE NO. V00524

Box 3

Description of Institutional Controls

Parcel

Owner

Institutional Control

47.70-2-63.1

City of Rochester

Site Management Plan

Any disturbance of the City's underwater lands within the controlled property must be completed in accordance with a Sediment Management Plan.

Box 4

Description of Engineering Controls

Parcel

Engineering Control

47.70-2-63.1

Cover System

Clean sediment cap over impacted sediments

Periodic Review Report (PRR) Certification Statements

1. I certify by checking "YES" below that:

a) the Periodic Review report and all attachments were prepared under the direction of, and reviewed by, the party making the certification;

b) to the best of my knowledge and belief, the work and conclusions described in this certification are in accordance with the requirements of the site remedial program, and generally accepted engineering practices; and the information presented is accurate and complete.

YES NO

☒ ☐

2. If this site has an IC/EC Plan (or equivalent as required in the Decision Document), for each Institutional or Engineering control listed in Boxes 3 and/or 4, I certify by checking "YES" below that all of the following statements are true:

(a) the Institutional Control and/or Engineering Control(s) employed at this site is unchanged since the date that the Control was put in-place, or was last approved by the Department;

(b) nothing has occurred that would impair the ability of such Control, to protect public health and the environment;

(c) access to the site will continue to be provided to the Department, to evaluate the remedy, including access to evaluate the continued maintenance of this Control;

(d) nothing has occurred that would constitute a violation or failure to comply with the Site Management Plan for this Control; and

(e) if a financial assurance mechanism is required by the oversight document for the site, the mechanism remains valid and sufficient for its intended purpose established in the document.

YES NO

☒ ☐

**IF THE ANSWER TO QUESTION 2 IS NO, sign and date below and
DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue.**

A Corrective Measures Work Plan must be submitted along with this form to address these issues.

Signature of Owner, Remedial Party or Designated Representative

Date

IC CERTIFICATIONS
SITE NO. V00524

Box 6

SITE OWNER OR DESIGNATED REPRESENTATIVE SIGNATURE

I certify that all information and statements in Boxes 1,2, and 3 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

I William Parry, PG, CGWP at 1 Bell Crossings, Selkirk, NY 12158
print name print business address

am certifying as the CSX Transportation, Inc. PM (Owner or Remedial Party)

for the Site named in the Site Details Section of this form.



Signature of Owner, Remedial Party, or Designated Representative
Rendering Certification

7/1/18
Date

IC/EC CERTIFICATIONS

Box 7

Qualified Environmental Professional Signature

I certify that all information in Boxes 4 and 5 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

AMEC E&E, PC

I Jeffrey Sotek at 7 Southside Dr., Clifton Park, NY 12065
print name print business address

CSXT Rochester NY

River Street Site

am certifying as a Qualified Environmental Professional for the _____
(Owner or Remedial Party)



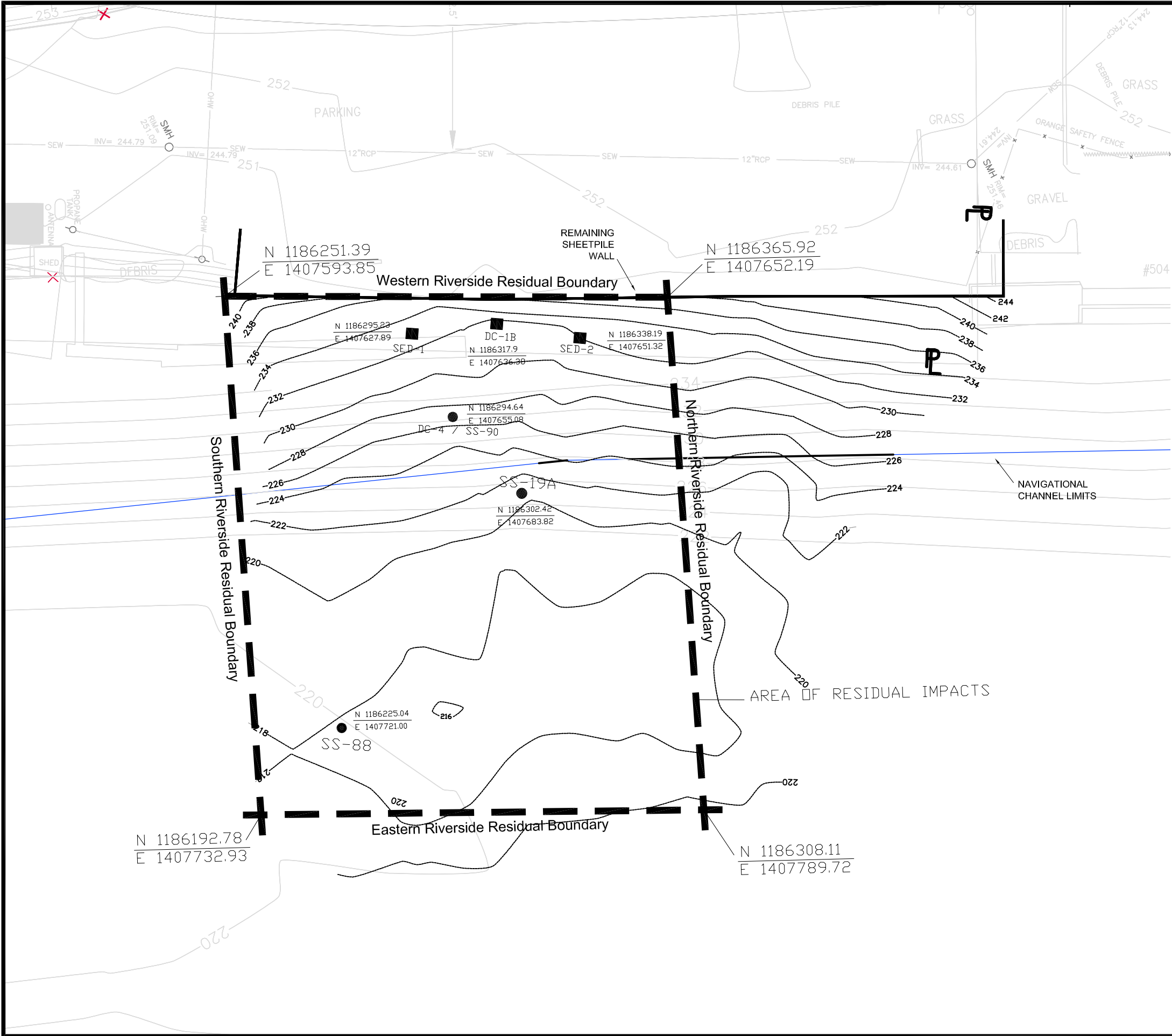
7/2/18

[Signature]
Signature of Qualified Environmental Professional, for
the Owner or Remedial Party, Rendering Certification

Stamp Date
(Required for PE)

ATTACHMENT B

Figure 2 from Site Management Plan-June 2012

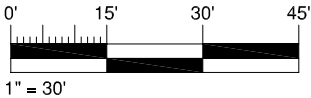
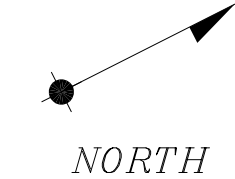


LEGEND:

- POST-DREDGING RIVER BOTTOM CONTOUR
- CSXT SEDIMENT SAMPLE LOCATION CONTAINING RESIDUAL METHYLENE CHLORIDE CONCENTRATIONS
- CITY SEDIMENT SAMPLE LOCATION CONTAINING RESIDUAL METHYLENE CHLORIDE CONCENTRATIONS
- BOUNDARY OF RESIDUAL IMPACTS

NOTES:

- BATHYMETRIC SURVEY SERVICES WERE PROVIDED BY THEW ASSOCIATES, CANTON, NY TO DOCUMENT AS-BUILT CONDITIONS.
- THE EXISTING SHEET PILE WALL WAS LEFT IN PLACE AND CUT FLUSH WITH THE RIVER BED.
- ORIGINAL BASE MAP PROVIDED BY LABELLA ASSOCIATES, PC, ROCHESTER, NY
- RESIDUAL IS DEFINED IN THIS DRAWING AS: A SAMPLE LOCATION CONTAINING METHYLENE CHOLIDE CONCENTRATIONS GREATER THAN THE ESTABLISHED SCGs. SAMPLES WERE COLLECTED DURING THE POST DREDGING SAMPLING EVENT (APRIL 2005).



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CLIENT:

**CSX
TRANSPORTATION**

PROJECT:

**SITE MANAGEMENT PLAN,
CSXT - RIVER STREET
DETAILMENT SITE
ROCHESTER, NY**

REV	DATE	DESCRIPTION

ISSUE / REVISION:	
DESIGNED BY: M. DOWD	DRAWN BY: M. YAU
CHECKED BY: M. DOWD	DATE: 2010-06-14
SCALE: AS SHOWN	ISSUE / REVISION: 0
DISCIPLINE LEAD: M. DOWD	PROJECT MANAGER: M. DOWD
PROJECT ENGINEER: M. DOWD	
PROJECT NUMBER: DESIGNED BY:	
TITLE: FIGURE 2 RIVERSIDE SITE RESIDUAL BOUNDARY MAP	