NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation, Region 8
6274 East Avon-Lima Road, Avon, NY 14414-9516
P: (585) 226-5353 I F: (585) 226-8139
www.dec.ny.gov

October 12, 2023

CSX Transportation, Inc
William Parry, PG, CGWP
One Bell Crossings
Selkirk, NY 12158

Re: Site Management (SM) Periodic Review Report (PRR) Response Letter

CSXT - Rochester NY, Rochester
Monroe County, Site No.: V00524

Dear William Parry, PG, CGWP (as the Certifying Party):

The Department has reviewed your Periodic Review Report (PRR) and IC/EC Certification for following period: May 31, 2018 to May 31, 2023.

The Department hereby accepts the PRR and associated Certification. The frequency of Periodic Reviews for this site is 5 year(s), your next PRR is due on June 30, 2028. You will receive a reminder letter and updated certification form 75-days prior to the due date. Regardless of receipt or not, of the reminder notice, the next PRR including the signed certification form, is still due on the date specified above.

If you have any questions, or need additional forms, please contact me at 585-226-5317 or e-mail: elizabeth.kaptein@dec.ny.gov. Thank you for your continued cooperation.

Sincerely,



Elizabeth Kaptein
Project Manager
Division of Environmental Remediation New York State
Department of Environmental Conservation

ec: D. Pratt, NYSDEC
C. Theobald, NYSDEC
J. Deming , NYSDOH

cc: City of Rochester
W. Danis
D.Crumb
W. Parry, PG, CGWP

3 Corporate Dr., Suite 202
Clifton Park, NY 12065
T 518.348.1190
TRCcompanies.com

June 30, 2023

Ms. Elizabeth Kaptein
New York State Department of Environmental Conservation
Region 8 – Division of Environmental Remediation
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
TRC Project Number: 484909

Dear Ms. Kaptein:

TRC Engineers, Inc. (TRC) has prepared this Periodic Review Report (PRR) and the required associated certification forms with supporting documentation (**Attachment A**), on behalf of CSX Transportation, Inc. (CSXT), for the CSXT-River Street Derailment Site located at 480 River Street 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 V00524.

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.

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 SMP with updated contact information is supplied in **Appendix B**.

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.

TRC, on behalf of CSXT, contacted both the City of Rochester, Ms. Anne Spaulding, and the USACE, Mr. Michael Asquith, to determine if either entity had conducted dredging activities or other activities that may disturb the sediments within the SMP area in the past five years or if they had plans to do so in the next five years.

The City's engineering consultant, Labella Associates, reviewed the files and indicated the City completed activities (i.e. sounding) in 2018 and 2019 to determine river depth information and the need for dredging to maintain the boat slip areas. Subsequently, dredging was intended to be completed in 2019, in concert with the USACE activities, to maintain a six-foot draft for the boats. However, due to high water levels in the river, the City dredging was not completed and no additional attempts have been given to date. The City's permit documents are valid until April 1, 2024. The permit includes the location of the stone backfill that caps the limited residual riverside impacts in the cross-section drawing and illustrated it would not be disturbed during the City's maintenance dredging. As such, 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.

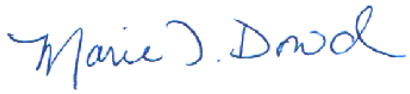
The USACE indicated that they completed maintenance dredging of the Federal navigational channel three times over the last 5 years; 2019, 2021, and earlier this year, 2023. Additionally, maintenance dredging of the channel is also anticipated in 2024, 2026, and 2028 pursuant to Mr. Asquith of the USACE. In all cases, Mr. Asquith confirmed that the depth of the dredging would be consistent with the authorized channel depth of 21 – feet below low water datum (LWD) with an allowance for one-foot of over depth to an elevation of 22 – feet below LWD. This equates to 221.3 - feet IGLD85. Dredging to

these depths will not disturb the SMP sediments.

The updated SMP was supplied to both the COR and the USACE for future reference.

Should you have any questions regarding the enclosed information, please do not hesitate to contact me at 518-894-2871 or mdowd@trccompanies.com.

Sincerely,
TRC Engineers, Inc.



Marie Dowd, PE
Principal Engineer

Attachments: A Certification Forms with Supporting Documentation
B Site Management Plan - 2012 with Contact Updates Noted

ATTACHMENTS A

Certification Form

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

Reporting Period: June 1, 2018 to June 30, 2023

	YES	NO
1. Is the information above correct?	X	☐
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?	☐	X
3. Has there been any change of use at the site during this Reporting Period (see 6NYCRR 375-1.11(d))?	☐	X
4. Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property during this Reporting Period?	X	☐
If you answered YES to questions 2 thru 4, include documentation or evidence that documentation has been previously submitted with this certification form.	See attachments at end of Cert Form	
5. Is the site currently undergoing development?	☐	X

Box 2

	YES	NO
6. Is the current site use consistent with the use(s) listed below? Unrestricted, Residential, Restricted-Residential, Commercial, and Industrial	X	☐
7. Are all ICs/ECs in place and functioning as designed?	X	☐

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

Box 5

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 compete.

YES	NO
X	☐

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
X	☐

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 (print name) at 1 Bell Crossing Road, Selkirk, NY 12158 (print business address)

am certifying as the CSX Transporation, Inc. Senior Manager Environmental Remediation (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

6/30/2023
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.

I Marie T Dowd, PE (print name) at 3 Corporate Drive, Suite 202, Clifton Park, NY 12065 (print business address)

am certifying as a Qualified Environmental Professional for the CSX Transportion, Inc. - River Street Derailment Site (Owner or Remedial Party)

Marie T Dowd

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

NYPE 080977 (Stamp (Required for PE))

6/30/2023 (Date)

PERMIT

Under the Environmental Conservation Law (ECL)

Permittee and Facility Information

Permit Issued To:
CITY OF ROCHESTER
30 CHURCH ST

ROCHESTER, NY 14614
(585) 428-7474

Facility:
GENESEE RIVER MARINA DREDGING
RIVER ST ALONG PETTON ST - N SIDE TO|S OF ONTARIO BEACH CO PARK
ROCHESTER, NY

Facility Location: in ROCHESTER in MONROE COUNTY
Facility Principal Reference Point: NYTM-E: 288.109 NYTM-N: 4792.044
Latitude: 43°15'05.1" Longitude: 77°36'36.9"
Project Location: City of Rochester Marina Dredging
Authorized Activity: Annual maintenance dredging of the City of Rochester Marina areas 1, 2, & 3 to the depths outlined in the attached plans along with placement of the material at the US Army Corps of Engineers open lake placement area. The approximate amount of material to be dredged:

Area #1:	7,800 cubic yards
Area #2:	3,150 cubic yards
Area #3:	5,700 cubic yards
Total:	16,650 cubic yards

Permit Authorizations

Excavation & Fill in Navigable Waters - Under Article 15, Title 5
Permit ID 8-2614-00955/00001
New Permit Effective Date: 4/2/2019 Expiration Date: 4/1/2024
Water Quality Certification - Under Section 401 - Clean Water Act
Permit ID 8-2614-00955/00002
New Permit Effective Date: 4/2/2019 Expiration Date: 4/1/2024

7H



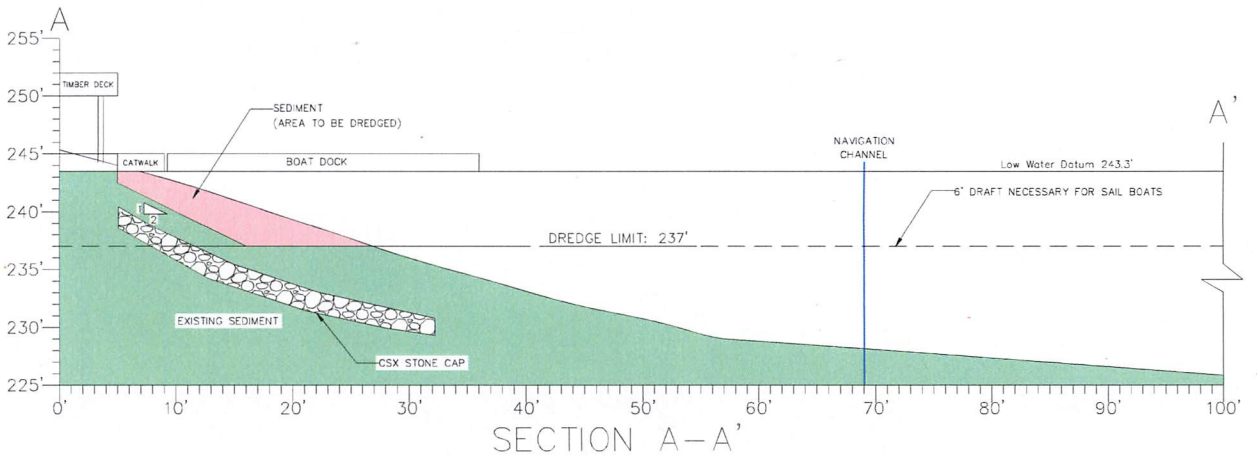
PROJECT #/DRAWING #/ DATE	DRAWING NAME:	CLIENT:	
2180099 FIGURE 1 12/14/2018	SITE LOCUS WITH PROPOSED DREDGING AREAS	CITY OF ROCHESTER, NEW YORK PROJECT: PROPOSED GENESEE RIVER DREDGING PROJECT	N W E S 0 220 440 Feet 1 inch = 300 feet INTENDED TO PRINT AS: 11" X 17" LaBella Powered by partnership.

Path: \\Projects2\ProjectsNZ-2\Rochester, City\2180099 - Port Permitting Dredging Plan\Drawings\Survey\Areas 1 and 2 and 3 2017\FIGURE 1 ALL AREAS.mxd

Attachment "A"

Attachment "J"

AREA #2 RIVER ST MARINE NORTH DOCKS
237' DREDGE LIMIT



SECTION A–A'

NOTE:

1. ELEVATIONS SHOWN IN INTERNATIONAL GREAT LAKES DATUM 1985 (IGLD 85).
2. BOAT DOCK LENGTHS MAY VARY.
3. BOAT DOCKS TO BE REMOVED BY MARINA OPERATOR PRIOR TO DREDGING.

LEGEND

- NAVIGATION CHANNEL
- 6" ARMOR FLEX SCOUR PROTECTION
- DREDGE AREA
- SEDIMENTS OUTSIDE DREDGE AREA
- DRAFT DEPTH

NO.	REVISION	BY	DATE
1			
2			
3			
4			
5			

LaBella
Powered by partnership

PROJECT/CLIENT
PROPOSED GENESEE RIVER DREDGING PROJECT
CITY OF ROCHESTER, NEW YORK

DRAWING TITLE
AREA #2
RIVER STREET MARINE - NORTH DOCKS
CURRENT SEDIMENT CONTOURS
AS OF 2017 - CROSS SECTION A-A'

ENGINEER OF RECORD	
DESIGNED BY	–
DRAWN BY	DMP
REVIEWED BY	–
DATE: DECEMBER, 2018	SCALE: NONE

PROJECT/DRAWING NUMBER
2180099

FIGURE 3A

INTENDED PRINT SIZE: 11"X17"

Dowd, Marie

From: Asquith, Michael D CIV USARMY CELRB (USA) <Michael.Asquith@usace.army.mil>
Sent: Thursday, June 29, 2023 6:45 AM
To: Dowd, Marie
Cc: Feldmann, Joshua J CIV USARMY CELRB (USA)
Subject: RE: [EXTERNAL] RE: Request for Information - NYSDEC CSX River Street Derailment Site - Genesee River - 2023 PRR

This is an **EXTERNAL** email. Do not click links or open attachments unless you validate the sender and know the content is safe.

ALWAYS hover over the link to preview the actual URL/site and confirm its legitimacy.

Correct, 221.3' IGLD85.

From: Dowd, Marie <MDowd@trccompanies.com>
Sent: Wednesday, June 28, 2023 4:20 PM
To: Asquith, Michael D CIV USARMY CELRB (USA) <Michael.Asquith@usace.army.mil>
Cc: Feldmann, Joshua J CIV USARMY CELRB (USA) <Joshua.J.Feldmann@usace.army.mil>
Subject: [Non-DoD Source] RE: [EXTERNAL] RE: Request for Information - NYSDEC CSX River Street Derailment Site - Genesee River - 2023 PRR

Thank you Mike!

Does your authorized channel dredge depth equate to 221.3' IGLD85?

From: Asquith, Michael D CIV USARMY CELRB (USA) <Michael.Asquith@usace.army.mil>
Sent: Wednesday, June 28, 2023 1:55 PM
To: Dowd, Marie <MDowd@trccompanies.com>
Cc: Feldmann, Joshua J CIV USARMY CELRB (USA) <Joshua.J.Feldmann@usace.army.mil>
Subject: [EXTERNAL] RE: Request for Information - NYSDEC CSX River Street Derailment Site - Genesee River - 2023 PRR

This is an **EXTERNAL** email. Do not click links or open attachments unless you validate the sender and know the content is safe.

ALWAYS hover over the link to preview the actual URL/site and confirm its legitimacy.

Marie:

Dredging conducted by the USACE in the last 5 years (July 2018 – June 2023): Standard Operation and Maintenance dredging was performed in 2019, 2021, and 2023. Dredging may have been performed in the in your general are of interest in 2019. However all dredging was performed to the authorized channel depth of -21'LWD with an allowance for one-foot of overdepth to an elevation of -22'LWD.

Dredging planned in the next 5 years (2024 – 2028): Dredging is scheduled to be performed again in 2024, and will be performed approximately every other year based on the availability of funds.

Michael D. Asquith, PMP
Buffalo District, Corps of Engineers
Program Manager, Project Management Team michael.asquith@usace.army.mil
O: 716-879-4352
C: 716-725-3976
F: 716-879-4194
Mailing Address:
USAED Buffalo
1776 Niagara Street
Buffalo, New York 14207

From: Dowd, Marie <MDowd@trccompanies.com>
Sent: Monday, June 26, 2023 8:51 AM
To: Asquith, Michael D CIV USARMY CELRB (USA) <Michael.Asquith@usace.army.mil>
Cc: Feldmann, Joshua J CIV USARMY CELRB (USA) <Joshua.J.Feldmann@usace.army.mil>
Subject: [Non-DoD Source] Request for Information - NYSDEC CSX River Street Derailment Site - Genesee River - 2023 PRR
Importance: High

Hi Mr. Asquith –

I found your contact information in the files from 2018, the last time the Period Review Report (PRR) was prepared as required by the NYSDEC for this site – CSX River Street Derailment, Genesee River, Rochester, NY.

CSX transferred the environmental consulting services responsibility to TRC Engineers, Inc. from Wood (now WSP), in 2021.

The PRR needs to be prepared every 5 years. As such, I have similar questions for you, as the USACE received in 2018.

1. Has any dredging been conducted by the USACE in the last 5 years (July 2018 – June 2023) within the Area of Residual Impacts as shown on the attached Figure 2 from the Site Management Plan?

2. Is any dredging planned in the next 5 years by the USACE in the Area of Residual Impacts?

If the answer is yes to either of the above questions, please provide the plans so we can review and incorporate information into our PRR for the NYSDEC.

Please feel free to contact me with any questions.

Thank you in advance for your assistance,

Marie Dowd, PE
TRC Engineers, Inc.
3 Corporate Drive, Suite 202
Clifton Park, NY 12065
518-894-2871

ATTACHMENT B

Site Management Plan, 2012
~ Contains updated Contact Information ~

SEDIMENT MANAGEMENT PLAN
CSXT-River Street Derailment Project
Rochester, NY
2012

1.0 INTRODUCTION AND BACKGROUND

This Sediment Management Plan (SMP) summarizes the site background; describes the historical field activities, the interim remedial measures (IRM), and subsequent monitoring events; and details the proposed institutional controls to address the residual impacts in the remaining sediment hot spots within the Genesee River from the December 23, 2001 derailment of a CSXT freight train in Rochester, New York.

This SMP is intended 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 disturb river sediments within the interim remedial measure (IRM) dredging limits.

1.1 Site Description

The Site is located on River Street in the City of Rochester, County of Monroe, and State of New York. The derailment occurred along the CSXT railroad tracks adjacent to the Monroe County Public Boat Launch where the tracks make a westward change in direction. The site is located in an area comprised of mixed industrial/commercial properties with residences present to the west and south. The locations of the impacts within the Genesee River were generally located adjacent to the landside spill area extending from the shoreline to the approximate centerline of the river channel. **Figure 1** details the location of the Site.

1.2 Site History

On December 23, 2001 at 3:40 p.m., a CSXT train derailed in Rochester, New York, north of the Latta Road and River Street intersection. The train consisted of 43 cars (including two diesel locomotive engines) traveling north from Kodak Park towards the RG&E Russell Station when the accident occurred. The two engines and 28 additional cars derailed. A majority of the cars contained coal. However, two tank cars contained acetone and one contained methylene chloride. The tank cars derailed slightly northeast of the Tapecon, Inc. (Tapecon) manufacturing facility and approximately 100 feet to 150 feet west of the Genesee River. The area in which the acetone and methylene chloride was spilled is approximately one mile upstream from the mouth of the Genesee River. Approximately 14,000 gallons of acetone, 16,000 gallons of methylene chloride, and 3,000 gallons of diesel fuel were released into the environment.

1.3 Previous Field Activities

1.3.1 Emergency Response Activities

Immediately following the derailment, emergency response activities commenced including fire suppression; diesel, coal, and plastic pellet cleanup; spill delineation and containment; continuous community air monitoring; and river water quality monitoring. For a complete description of the emergency response activities refer to the *River Street Derailment Interim Remedial Measure Report*, Shaw, March 10, 2003.

1.3.2 Sediment Investigation

Ten sampling events, identified chronologically as Phases, were conducted in the Genesee River to determine the extent of impacts to the sediments and monitor COC concentrations. Samples were collected from 79 locations throughout the course of the ten sampling Phases. In total, 370 samples were collected during these events to fully characterize the sediments adjacent to the landside of the derailment Site. Although sampling locations have varied during each sampling event, a number of the sampling locations remained consistent throughout the events to monitor for possible migration or natural attenuation.

For a complete discussion of sediment and surface water monitoring activities please refer to the *River Street Derailment Interim Remedial Measure Report*, Shaw, March 10, 2003; *Remedial Action Selection/Design Report,* AMEC, October, 2 2003 and *Dredging Interim Remedial Measure Summary Report, AMEC, May 20, 2005.*

1.3.3 Interim Remedial Measures

An IRM work plan for impacted sediment was developed and implemented in the summer of 2004. The primary objectives of the IRM were to:

- Protect human health and the environment.
- Remove sediments exceeding the site-specific cleanup levels of 1,133 micrograms per kilogram (ug/kg) for methylene chloride and 773 ug/kg for acetone.
- Minimize chemicals of concern migration caused by resuspension of impacted sediments.
- Remediate the navigational channel to at or below its maintenance dredging limits and to allow for open water or lake bottom disposal of maintenance

dredging spoils from subsequent USACE maintenance dredging operations.

The IRM activities included the excavation, dewatering, stabilization and disposal of approximately 3,950 tons of the acetone and methylene chloride impacted sediments. The IRM activities were successful in removing the vast majority of impacted sediment from the river. For a complete discussion of the dredging IRM activities please refer to the *Dredging Interim Remedial Measure Summary Report*, AMEC, May 20, 2005.

1.3.4 Genesee River Water Quality Monitoring

River water quality monitoring was conducted on a regular basis following the derailment incident. A significant decrease in chemicals of concern (COC), methylene chloride and acetone, concentrations was evident during the first year. Since then the COC detection's have been either non-detect or extremely minimal. Including the last sampling event, completed in April 2005, analytical results for the last five events have been below the sample quantitation limit. This indicates that residual COCs in the sediment are not adversely affecting the water column above them.

2.0 NATURE AND EXTENT OF REMAINING RESIDUALS

A design quantity of 3,000 cubic yards (CY) of sediment was to be removed. Based on disposal certificates, project records indicate that 2,856 CY (3,950 tons) was actually removed. This is 95% of the project goal. As a result, a vast majority of impacted sediments from the bed and bank of the Genesee River were eliminated during the IRM. Factors that made the removal of all impacted sediment infeasible:

- Concerns with the stability of the sheet pile wall and shoreline prevented deeper excavations along the riverbank.
- The density of the deeper sediments within the riverbed made further removal at depth with the environmental clamshell dredge infeasible.
- Methylene chloride is the primary COC and it does not readily bind to sediment.

Based on initial IRM closure sediment sampling, two of the 10 closure sample locations exhibited concentrations that exceeded the site-specific cleanup levels of 773 ug/kg for acetone and 1,133 ug/kg for methylene chloride. Closure samples DC-4 and DC-8 were identified as being above the cleanup levels at 24,000 and 1,900 ug/kg methylene chloride, respectively. DC-4 is located outside the navigational limits and will not be

disturbed by current USACE maintenance dredging protocol. Also, DC-4 is at an elevation of 218.3 feet IGLD85 that is only 0.4 feet above the 217.9 feet IGLD85 target and within the specified +/- 0.5 foot construction tolerance. Closure sample DC-8 is located within the channel limits, but at a depth three feet below the USACE dredge elevation (221.3 feet IGLD85). Therefore, the residual methylene chloride contained in the sediment should not be disturbed by current USACE maintenance dredging protocol. Also, DC-8 exhibited a methylene chloride concentration that was within the same order of magnitude as the 1,133 ug/kg site-specific cleanup level.

Due to these two dredging closure sample locations having exhibited residual methylene chloride above the site-specific cleanup level, CSXT implemented additional monitoring in April 2005. Sediment samples were collected from a total of six locations: SS-19A, SS-15, SS-24, DC-4/SS-90, DC-8/SS-89, and SS-88. Samples DC-4/SS-90, SS-19A and SS-88 were identified as having elevated concentrations of methylene chloride. As stated above, DC-4/SS-90 is outside of the navigational channel limits. Its concentration of 2,400 ug/kg, was also a full order of ten magnitude lower than that detected in the October 2004 closure sample. Although sample SS-19A is within the navigational limits, like DC-8/SS-89, it is located below the USACE dredging limit (221.3 feet IGLD85) at an elevation of 220.7 feet IGLD85. Further, additional dredging in the vicinity of SS-19A is unlikely, as the area of SS-19A must be maintained at a 4H:1V slope to ensure upland stability of the riverbank. The sample collected at the two feet depth interval at SS-88 did not meet the 1,133 ug/kg site-specific cleanup level. However, the upper sample collected at SS-88, 0.5 feet below the sediment surface, met the level. The elevated sample from SS-88 is at an elevation of 217 feet IGLD85 which is 4.3 feet below the USACE maintenance dredge depth of 221.3 feet IGLD85.

Table 1 identifies the sample identification numbers and the corresponding historical analytical results of the locations that exhibited exceedances during the post dredging April 2005 monitoring event. **Figure 2** illustrates the locations of the exceedances and the Approximate Limits of IRM Dredging.

TABLE 1
Residual Methylene Chloride Analytical Results

Sample ID	June '04	October '04	April '05
SS-19A	10,000,000 E	NA	12,000,000
SS-88 – 2'	NA	8 U	52,000
DC-4/SS-90	NA	24,000	2,400

Methylene chloride cleanup criteria approved by the NYSDEC and the is 1,133 ug/kg
E – Identifies the compound exceeded the instrument's calibration range
U- Compound was analyzed for but not detected

NA – Not Applicable
All units are in ug/kg (ppb)
All concentrations are from the top 1' of sediment (except as noted).

3.0 SEDIMENT MANAGEMENT PLAN

The dredging IRM removed the impacted sediments to the extent feasible, and in doing so, removed the vast majority of the impacted sediments. The residuals are limited in nature to hot spots within the Approximate Limits of IRM Dredging depicted in **Figure 2**. Moreover, the IRM was completed in such a manner that future activities conducted in the river should not be adversely affected by the residuals from the 2001 CSXT derailment. The remaining methylene chloride is not expected to be resuspended during USACE maintenance dredging activities (because the sediments are below the specified dredge depth of 221.3' IGLD85) and is not of sufficient quantity to be detectable in the Genesee River water column as demonstrated by the analytical results. However, if the USACE dredging limits are revised or if future development activities disturb river sediments within the Approximate Limits of IRM Dredging, management of the sediment containing residual methylene chloride impacts will be required.

3.1 Notification

If development, maintenance dredging, or any other type of work is planned within the Approximate Limits of IRM Dredging identified on **Figure 2** which has the potential to disturb sediment, then it is necessary to contact Paul Kurzanski, CSXT, Manager Environmental Remediation at 1-904-359-3101.

3.2 Project Plan Review

CSXT or its representative will be supplied in full, final copies of the design plans, maintenance activities, etc. CSXT will, in a timely manner, review the project documents, to determine whether the potential of the work might disturb the residual sediment impacts.

3.3 Determination of Potential of Residual Disturbance

Based on the review of the project documents, CSXT will execute one of the following three courses of action:

1. Draft a letter to the applicable party and regulatory agencies indicating that their intended project plans were carefully reviewed and the proposed actions will not disturb the identified residual impacts.
2. Draft a letter to the applicable party and regulatory agencies indicating that their

intended project plans have the potential to disturb the identified residual impacts. In addition, CSXT will promptly implement a sampling program within the area of potentially disturbed sediments to ascertain whether any residual impacts in excess of the site-specific cleanup levels remain. Included within that sampling program will be an appropriate background study, including at least one sample taken up-river of the Approximate Limits of IRM Dredging in order to ascertain whether background conditions have changed since the implementation of the dredging IRM. If the sampling indicates the potential for disturbing sediments containing residual impacts in excess of the site-specific cleanup levels, CSXT will also provide for a representative to be on-site during the course of the work that may disturb the residual impacts. If the activities are concluded to be within a close proximity to the residual location, CSXT will provide labor and materials or cover the costs incurred with respect to the residually impacted sediment and any associated water by the applicable party to properly handle, segregate, stage, sample, analyze, and dispose (if impacted with methylene chloride or acetone in excess of the site-specific cleanup levels) of the impacted sediment and associated water.

3. Draft a letter to the applicable party and regulatory agencies indicating that their intended plans will likely disturb the location where sediments with residual impacts have been previously identified. CSXT will also characterize the area of disturbance in close proximity to the identified residual sediment impacts prior to the work to verify the presence or absence of residuals. CSXT will promptly implement a sampling program within the area of potentially disturbed sediments to ascertain whether any residual impacts in excess of the site-specific cleanup levels remain. Included within that sampling program will be an appropriate background study, including at least one sample taken up-river of the Approximate Limits of IRM Dredging in order to ascertain whether background conditions have changed since the implementation of the dredging IRM. If the sampling indicates the potential for disturbing sediments containing residual impacts in excess of the site-specific cleanup levels, CSXT will also provide for a representative to be on-site. CSXT will work closely will the applicable party, regulators, subcontracts, etc. to ensure proper plans, notifications, permits, health and safety measures, decontamination procedures, and monitoring (air, water, etc.) are in place prior to the initiation of the work as a result of the disturbance of the residuals. If necessary, CSXT will provide labor and materials or cover the costs incurred by the applicable party to: prepare and implement work plans; notifications and permits; additional health and safety measures; conduct monitoring (air, water, etc.); properly handle, segregate, stage, sample, analyze, and dispose of the impacted sediment and associated water.

4.0 CONTACT INFORMATION Updated 6/29/2023

Key contacts that have been involved with the CSXT-River Street Derailment Project are provided below. The list includes the CSXT Manager Environmental Remediation, CSXT's engineering consultant (TRC Engineers, Inc.), ~~CSXT's internal and local legal counsel (Hiscock Barclay, LLC)~~, NYS regulators, ~~Monroe County officials~~, City of Rochester engineer's and lawyers, and the USACE representative.

COMPANY	NAME	Title	PHONE	E-MAIL
CSXT	William Parry	Senior Mngr Env Rem	518-767-6049	william_parry@csx.com
TRC	Marie Dowd	Project Manager	518-894-2871	mdowd@trccompanies.com
NYSDEC	Elizabeth Kaptein	Env. Eng. Technician	585-226-5317	elizabeth.kaptein@dec.ny.gov
City of Rochester	Andrew Creary	City Attorney	585-428-6810	andrew.creary@cityofrochester.gov
City of Rochester	Anne Spaulding	Mngr of Env Quality	585-428-7474	anne.spaulding@cityofrochester.gov
USACE	Michael Asquith	Program Manager	716-879-4352	michael.asquith@usace.army.mil



CSX TRANSPORTATION

Public Safety & Environment

Site Location Map

CSXT River Street Derailment Site
Rochester, NY

Figure #1

Monroe County — New York

LOCATOR



LEGEND

CSXT Rail

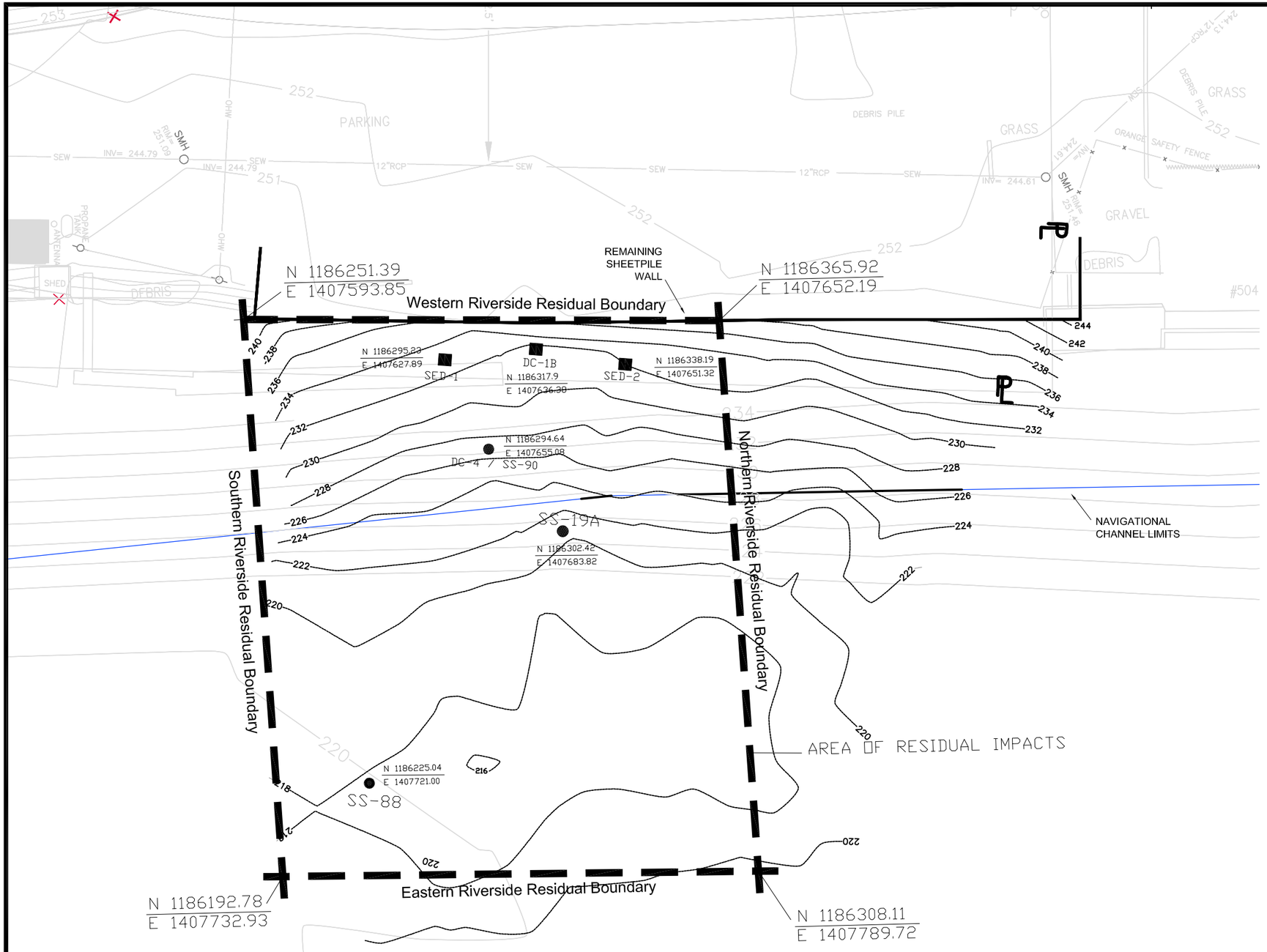
NOTES & SOURCES

Aerial Imagery Source: USGS
Projection: NAD 83 UTM Zone 18N
Map Created: 4 May 2005

0 — 200 Feet

N
W E
S

AMEC Earth & Environmental, Inc.
Westford, Massachusetts



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:

1. BATHYMETRIC SURVEY SERVICES WERE PROVIDED BY THEW ASSOCIATES, CANTON, NY TO DOCUMENT AS-BUILT CONDITIONS.

2. THE EXISTING SHEET PILE WALL WAS LEFT IN PLACE AND CUT FLUSH WITH THE RIVER BED.

3. ORIGINAL BASE MAP PROVIDED BY LABELLA ASSOCIATES, PC, ROCHESTER, NY

4. 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).

NORTH

0' 15' 30' 45'

1" = 30'

AMEC
Earth & Environmental, Inc.
2 Robbins Road
Westford, Massachusetts 01886
Telephone: (978) 692-9090
Fax: (978) 692-6633
Web: www.amec.com

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

Figure 2 – Jun. 14, 2010 10:43am – michael.you

U:\DEPT-EGNR\CSX\CSX Rochester\2010-06-14 Site Management Plan\Figure 2.dwg – Figure 2