ACS

Former Excelsior Steel Ball
303 Woodward Avenue, Tonawanda NY
NYSDEC Site # V00685

Soil Management Plan

TM Montante Solar Development LLC
2760 Kenmore Avenue, Suite 100
Tonawanda, New York 14150
P: (716) 876-8899

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1.0 INTRODUCTION

The former Excelsior Steel Ball Company was located at 303 Woodward Avenue, Tonawanda NY. The site was remediated under a voluntary Cleanup Agreement (Site # Voo685-9) with the NYSDEC.

ACS Inc. has prepared this Contaminated Material Handling Plan (CMHP) for the T M Montante Solar project for any soil material handling activities to be conducted at the 303 Woodward Solar Project This Plan specifies requirements for the excavation and management of potentially contaminated soils at the site.

TM Montante intends to have very minimal soil disturbance in the ground, the most disturbance will be the installation of a utility pole (maximum 5 yards of material). The supports for solar panels will be direct push into the ground and all electrical conduit will be above ground.

2.0 NOTIFICATIONS

At least 7 calendar days prior to commencing work in known contaminated areas, ACS will prepare and submit advance notification letters to the NYSDEC Engineer.

3.0 SOIL MANAGEMENT PROCEDURES

ACS will provide an on-site Contaminated Material Manager, who will coordinate the staging, characterization, off-site transportation and disposal of excavated contaminated material generated from this project. Staging or stockpiling will be conducted in a manner that facilitates continued excavation activities and ensures that the different waste streams generated are continuously segregated. The Contaminated Material Manager will document all excavation activities within a field log book. Information such as, material type (i.e., soil, concrete, gravel, etc.), location, visual observations (i.e., odors, debris, staining), lift depth, waste stream, etc. shall be documented. ACS will be responsible for the segregation, staging, testing, and management of all excavated contaminated materials from the site.

Dedicated on-site equipment will be used for the excavation activities. The management of excavated materials will utilize procedures to promote material segregation and minimize contact between potentially contaminated and clean material. These procedures will also ensure that potentially contaminated materials do not migrate off-

site into including adjacent properties and roadways. All potentially contaminated equipment will be decontaminated prior to leaving the site.

A Hydrovac machine will be used for excavating materials in will be screened or scanned and the materials will be directly transported to the landfill.

4.0 FIELD SCREENING

Excavated materials suspected of contamination will be visually inspected for evidence of contamination and screened for total volatile organic vapors using a field calibrated Rae Systems photo ionization detector (PID). These petroleum or other contaminated impacted soils that are not contaminated will be segregated from both clean and contaminated material. The PID will be field calibrated daily using isobutylene gas. The results of all screening (i.e., visual, elevated PID readings, etc.) will be documented in the field log book.

5.0 FIELD DOCUMENTATION

All excavation activities (i.e., excavation, soil quantity, visual observations, sampling, etc.) will be documented in a field logbook or equal.

6.0 SEGREGATION AND STORAGE

ACS will notify the NYSDEC immediately if material is discovered that appears to contain unknown contaminants or material that varies significantly from the type of contamination identified in the contract documents. In the event that unexpected conditions occur (unusual soil coloration, unusual, etc.) all work in the area will be stopped until a thorough evaluation (i.e., soil analysis) has been completed. The staged material will be covered daily and during precipitation events. The covered material will be secured during inclement weather and during periods of inactivity.

6.1 Trucks and Disposal Containers

ACS will prepare and maintain trucks and disposal containers as follows:

At the end of each work day, the Hydrovac will directly dispose of any of the

contaminated soils at the landfill. The intent is to not store any of soils on site in dumpsters or dump trucks.

7.0 SOIL SAMPLING

This section presents a description of the soil sampling activities that will be performed at the site to properly characterize excavated material prior to off-site transportation and disposal.

Samples will be collected according to protocols defined in this plan, document field observations and sampling procedures, and follow chain-of-custody (COC) procedures. Thee frequency selected will be approved by the New York State Department of Environmental Conservation (NYSDEC) and be based upon volume of anticipated waste and disposal facility waste acceptance criteria. Sample and Document Custody procedures, including sample identification criteria, labeling, and COC, are specified below.

Samples will be submitted for analysis to an ELAP-approved and commercially approved chemistry laboratory, as applicable. The sample turnaround time for the project, from receipt of samples at the laboratory, is dependent on the field activities and urgency of the data. All soil samples will be analyzed in accordance to approved United States Environmental Protection Agency (USEPA) Solid Waste 846 (SW846) methodology and NYSDEC. Specifically, pH, TCLP Metals, VOC, SVOC, herbicides , pesticides and PCB's.

7.1 Sampling Equipment and Materials

All necessary equipment and materials will be assembled prior to initiating sampling activities.

Each sample will be uniquely identified in such a manner that the sample number identifies the location of the sample collection point (i.e. station number, address, etc.) and type of sample. This system will apply to samples collected during the excavation activities, which are to be transmitted to the analytical laboratory**.**

7.2 Sample Containers and Preservation

Appropriate sample containers, preservation methods, and laboratory holding times shall be maintained as appropriate.

The analytical laboratories will supply appropriate sample containers, as well as sample labels, preservatives if necessary, and coolers for sample shipment. The field personnel will be responsible for properly labeling containers and preserving samples, as appropriate.

7.3 Sample Labeling

All sample labels shall be completed legibly with indelible ink, affixed to the sample container, and covered with clear tape, as appropriate.

7.4 Chain of Custody Forms

Documentation of the sample COC is provided by the use of forms which record the sampling location, the type and number of samples collected, requested analyses, the date and time of sample collection, the name(s) of the person(s) responsible for sample collection, the date and time of all custody transfers, the signature of the person relinquishing and accepting sample custody, and other pertinent information.

A COC record will be initiated in the field and will accompany each group of samples during shipment to the laboratory. Each time custody of the sample changes, the new custodian will sign the record and indicate the dates of transfer. The COC forms will be completed and signed.

8.0 TRANSPORTATION AND DISPOSAL

Contaminated material will not be transported off site until sampling and analysis is performed and completed, and the material is in compliance with disposal facility waste acceptance criteria.

8.1 Transportation Off-Site

The Hydrovac will be covered with secured and waterproof to prevent water infiltration, evaporation of contaminants and spillage of contaminated material.

Contaminated material will be transported in vehicles with valid waste transporter permits for New York State (and other required permits/licenses from any other states as applicable). ACS will assure that required shipping papers, labeling, placarding, weighing/load measurements is completed and copies will be provided to the NYSDEC.

8.2 Waste Manifests and Shipping Documentation

Waste manifests if required, will be used to ship the waste for off-site treatment, storage, or disposal. The manifest is a multiple-copy tracking document required by USDOT and EPA/NYSDEC.

Manifest Tracking and Retention - Once the chain is complete, the TSD facility returns a signed copy of the manifest to the generator within 45 days of the date the waste was accepted. Manifests will be copied to the NYSDEC with all other transportation documentation.

8.3 Disposal/Treatment

Contaminated material will be disposed of by the methods and procedures described in this plan. Material characterization information, field identification and confirmation laboratory analyses, if included in the contract, will be used to determine appropriate classification and category of material for disposal. Each category of surplus or waste material shall be handled and disposed of based upon its characterization in accordance with the requirements for the following waste categories:

- Uncontaminated material;
- Contaminated waste;

Efforts will be made by project personnel to transport contaminated material to the proper disposal facility on a daily basis. At the current time, the following disposal facilities are anticipated to be used for this project.

Contaminated Material

Ensol – Tonawanda Landfill

Uncontaminated Materials- Apply to Surfaces