REMEDIAL ACTION WORK PLAN SUMMARY
BENGART AND MEMEL SCRAP METAL SITE (#9-15-115)
BUFFALO, NEW YORK

1. PROJECT DESCRIPTION

The New York State Department of Environmental Conservation (NYSDEC) will be remediation the Bengart and Memel (B&M) site in Buffalo, New York to address environmental contamination at the site. The remediation work will involve demolishing an existing dilapidated building, decommission an existing inoperable groundwater remediation system, excavating PCB impacted soils, and performing nominal site restoration. All work conducted on the site will be carefully coordinated with adjoining property owners to minimize disturbance to their operations. Based on recent information, soil and accumulations inside the building at the site are contaminated with PCBs at levels requiring hazardous waste disposal. Site information and date is presented in the Limited Site Data Report.

The former B&M business operations included the use of Lot 2.1 (SBL #112.77-4-2.1 current address of record is 1079 Clinton St.) and a larger adjoining lot identified as Lot 2.2 (SBL #112.77-4-2.2 current address of record is 1091 Clinton St.). Lots 2.1 and 2.2 were part of a single lot which were subsequently subdivided and separately sold. An asphalt cap system and groundwater collection and treatment system installed at the site (Lot 2.1) under a previous Order on Consent have not been maintained and kept operational. The current owner and respondent have abandoned the site. A limited site investigation conducted in 2006 revealed that significant environmental threats exist at the site. Based upon the results of this investigation, there is widespread PCB contamination of surface and subsurface soil/fill materials that are above TAGM 4046 and Part 375 standards for soil and sediment. Water collected at various points also indicated PCB contamination of groundwater and potential surface water discharges above applicable groundwater and surface water standards. Additionally, there are PCB levels in surface soils, sediments and subsurface soil/fill that render the material as characteristically hazardous waste.

The area (Lot 2.1) previously remediated by the owner under the Order consists of an asphalt capped area, storm water management and treatment, and shallow groundwater collection and treatment system. The elevation of the asphalt capped is sloped to allow drainage of surface water to a storm drain in the capped area which is connected to an oil/water separator which drains into the Buffalo Sewer Authority (BSA) combined sewer on Clinton Street. The oil/water separator serves as a treatment device for storm water runoff from the asphalt capped area. The groundwater water collection and treatment system consists of a shallow groundwater interceptor trench along the northern and western perimeter of Lot 2.1. The interceptor trench extends onto Lot 2.2. The interceptor trench contains a perforated 6-inch PVC drainpipe that directs intercepted groundwater to a sump. The sump originally contained a submersible pump which pumped collected water to two storage tanks for temporary storage. The water in the tanks was batch treated by pumping stored water through two carbon adsorption vessels to remove residual PCBs. The treated water was stored in a third tank for sampling prior to discharge to the BSA combined sewer. The treatment system is located on a concrete containment pad that straddles Lots 2.1 and 2.2. The treatment system

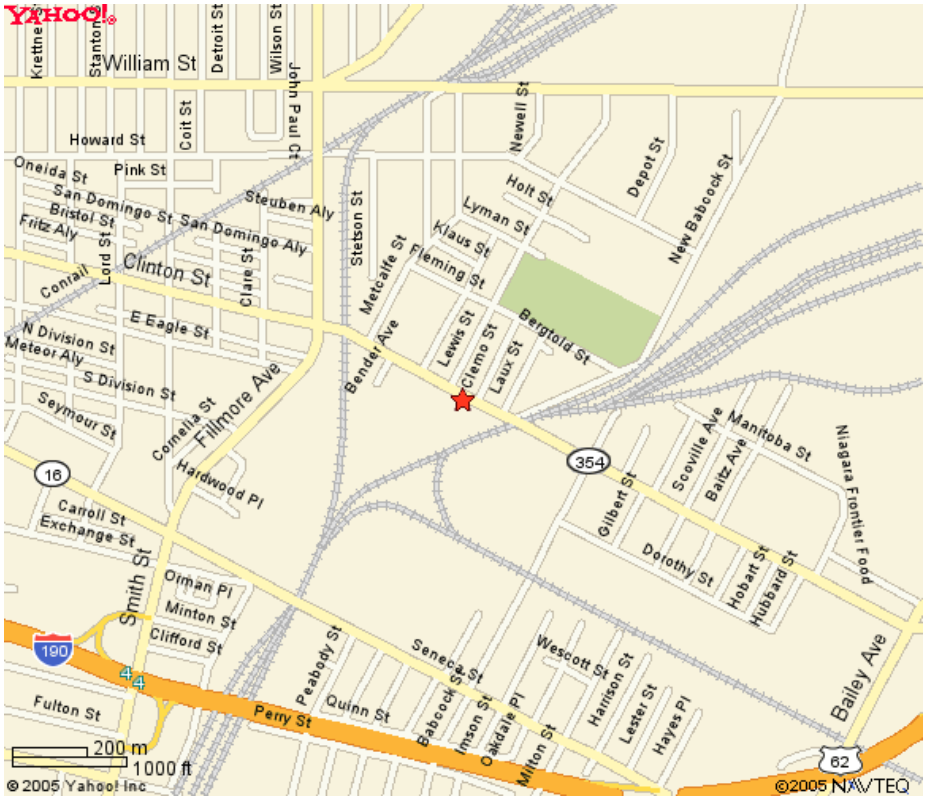
is exposed to the elements and none of the system piping and pumps were insulated for cold weather operation.

In order to address the environmental threats at the site, a feasibility evaluation was conducted. The results of the evaluation determined that removal of the threat was the desired feasible long term option.

2. SCOPE

The work consists of remedial action work includes, but is not limited to, the following:

1. Developing a Site Specific Health and Safety Plan and Project Work Plan, and conduct all work activities in accordance with the approved plan.
2. Obtaining all required permits necessary to perform the work.
3. Coordinating utility mark-out.
4. Coordinating transportation and disposal of regulated wastes with permitted disposal facilities in accordance with all applicable regulations and requirements.
5. Providing all necessary temporary support facilities and control.
6. Providing all personal protective equipment (PPE) appropriate for this work.
7. Performing Community Air Monitoring during all stages of the project until all wastes and hazardous materials have been removed from the site.
8. Protection of adjoining property improvements and on-site improvements not identified for removal and disposal.
9. Asbestos abatement and appropriate disposal of asbestos containing building materials identified in the asbestos survey prior to building demolition.
10. Demolition and appropriate disposal of the concrete block building, floor and foundations.
11. Decommissioning and removal of the groundwater collection and treatment system.
12. Partial removal of the storm drain system.
13. Removal and appropriate disposal of the asphalt cap system within limits indicated on the plans.
14. Excavation and appropriate disposal of impacted soils within limits indicated on the plans.
15. Restoration of site features including the placement of an aggregate base over the excavated areas indicated on the plans and placement of topsoil and seed to disturbed areas containing turf grass.
16. Installation of security features to limits indicated on the plans.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