Onsite/Offsite Hazardous Waste Management Plan for the TNT/Chemical Waste Sewer Line Removal

Lake Ontario Ordnance Works Site
Lewiston/Porter, New York

Contract# DACW49-00 D-002
Delivery Order 002

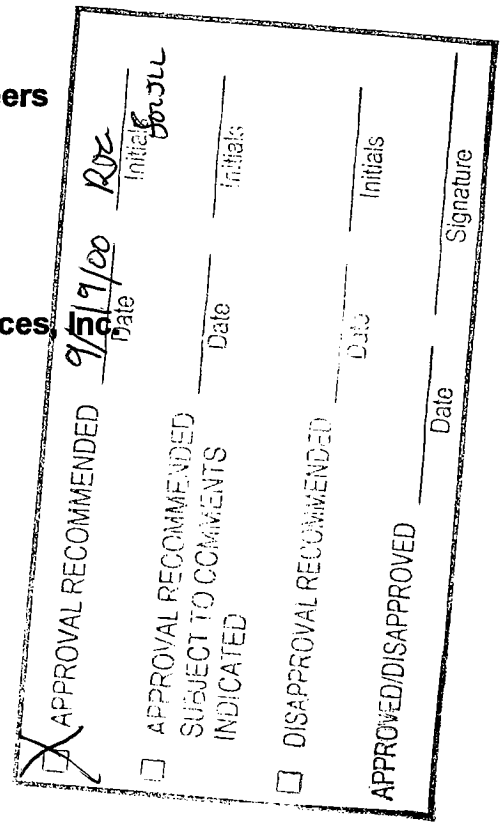
Prepared for

US Army Corps of Engineers
Buffalo District

Prepared by

Sevenson Environmental Services, Inc.

August 2000



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Signature
9/23/00
Date

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6.0 TRANSPORTATION QA PROGRAM

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1.0 Identification of Wastes

This Waste Disposal Plan covers all aspects of transport and disposal of various waste materials generated as part of the TNT/Chemical Waste Sewer Line Removal Project at the Lake Ontario Ordnance Works(L.O.O.W.) Site(the Site) located in the Towns of Lewiston/Porter, New York.

1.1 Lift Station Waters

1.1.1 Waste Hauler

Sevenson Environmental Services

NY-DEC Transporter Number: 9A-237
2749 Lockport Road
Niagara Falls, NY 14305
Name of Responsible Contact: Gary Rose
Telephone Number: 716 284-0431
Unit of Measure for Costing Purposes: Hour

Sevenson will provide a 3000 gallon CUSCO™ vacuum tanker unit to transport Lift Station Waters from the Site to CWM Chemical Services for aqueous treatment.

1.1.2 Lift Station Water Disposal

Facility Name: CWM Chemical Services, Inc.
USS EPA ID Number: NYD 049 836 679
Facility Location: 1550 Balmer Road, Model City, NY 14107
Name of Responsible Contact: Don Kopacz
Telephone Number: 716 754-8231
Unit of Measure for Costing Purposes: Gallon

CWM Chemical Services, Inc. will be providing aqueous treatment For Lift Station waters at their permitted wastewater treatment facility.

1.2 TNT Line Waters

1.2.1 Waste Hauler

NY-DEC Transporter Number: 9A-237
2749 Lockport Road
Niagara Falls, NY 14305
Name of Responsible Contact: Gary Rose
Telephone Number: 716 284-0431
Unit of Measure for Costing Purposes: Hour

Sevenson will provide a 3000 gallon CUSCO™ vacuum tanker unit to transport TNT Line Waters from the Site to CWM Chemical Services for aqueous treatment.

1.2.2 TNT Line Water Disposal

Facility Name: CWM Chemical Services, Inc.
USS EPA ID Number: NYD 049 836 679
Facility Location: 1550 Balmer Road, Model City, NY 14107
Name of Responsible Contact: Don Kopacz
Telephone Number: 716 754-8231
Unit of Measure for Costing Purposes: Gallon

CWM Chemical Services, Inc. will be providing aqueous treatment for TNT Line Waters at their permitted wastewater treatment facility.

1.3 TNT Line Sludges

1.3.1 Waste Hauler

Transporter: Price Trucking, Inc.
US EPA ID Number: NYD 048 487 931
Facility Location: 67 Beacon Street, Buffalo, NY 14220
Name of Responsible Contact: Jonathon Price
Telephone Number: 716 822-1414
Unit of Measure for Costing Purposes: Hour

Price Trucking Company will provide a box trailer to ship drummed TNT Line Sludge waste materials to CWM Chemical Services, Inc., Model City, New York.

1.3.2 TNT Line Sludge Disposal

Facility Name: CWM Chemical Services, Inc.
USS EPA ID Number: NYD 049 836 679
Facility Location: 1550 Balmer Road, Model City, NY 14107
Name of Responsible Contact: Don Kopacz
Telephone Number: 716 754-8231
Unit of Measure for Costing Purposes: Drum

CWM Chemical Services, Inc. will be accept drums of TNT Line Sludges for storage, re-manifesting, and trans-shipment to their incinerators in Port Arthur, Texas, or East Liverpool, Ohio.

1.4 CWS Line Soils

1.4.1 Waste Hauler

Transporter: Price Trucking, Inc.
US EPA ID Number: NYD 048 487 931
Facility Location: 67 Beacon Street, Buffalo, NY 14220
Name of Responsible Contact: Jonathon Price
Telephone Number: 716 822-1414
Unit of Measure for Costing Purposes: Hour

Price Trucking Company will provide aluminum body dump trailers to transport CWS Line Soils to CWM Chemical Services, Inc., Model City, New York.

1.4.2 CWS Line Waste Disposal

Facility Name: CWM Chemical Services, Inc
EPA ID Number: NYD 049 836 679
Facility Location: 1550 Balmer Road, Model City, NY
Name of Responsible Contact: Don Kopacz
Telephone Number: 716 754-8231
Unit of Measure for Costing Purposes: Ton

CWM Chemical Services, Inc. will be provide treatment and/or landfill disposal of CWM Line Soils at their permitted landfill facility in Model City, NY.

List of All Permits, Licenses, Letters of Approval Held By The Proposed RCRA/TSCA Facility Pertaining to TNT/Chemical Sewer Line Wastes
See information provided in Appendix A.

List of All Permits, Licenses, Letters of Approval Pending By The Proposed RCRA/TSCA Facility Pertaining to TNT/Chemical Sewer Line Wastes
None.

Describe the Waste Management Units
RCRA/TSCA permitted aqueous and solid waste treatment facility and landfill.

Date of Last Compliance Inspection

USEPA TSCA October 21, 1999
NYDEC RCRA March 27 and 28, 2000

1.5 Municipal (Office) Waste Disposal

Modern Disposal Services, Inc., of Model City, New York, provides a trash dumpster and periodically removes all office waste.

1.6 Sanitary Services (Port-a-Johns)

Modern Disposal Services, Inc., of Model City, New York, provides and maintains Port-a-Johns at the Site for use by site workers.

2.0 Pre-Transport Requirements

2.1 DOT-Required Placards

All transport vehicles shipped to CWM, Chemical Services from the L.O.O.W. Site will travel on private access roads to their destination. No public highways will be traversed during deliveries. As such, no D.O.T. placarding will be required for the transport vehicles.

Any DOT and/or RCRA/TSCA regulated materials transhipped from CWM Chemical Services(i.e. drummed sludges for incineration) will be transported in properly placarded, permitted vehicles. It is anticipated that DOT description for the sludges removed from portions of the TNT lines will be RQ, Waste Polychlorinated biphenyls, UN2315, PG II, (PCB), (Benzene). The required placard for this material is the Class 9, Hazardous Materials with PCB labels on the transport vehicle.

One placard and one PCB label will be affixed in a place that is clearly visible on each side and on each end of the transport container. The position, durability, color, size and type of the placard and the PCB label will comply with all requirements set forth by 49 CFR Section 172.504, 172.508, 172.516, 172.519, 172.331, and 172.332.

Office Waste and Sanitary Facility Waste from the Site are not considered D.O.T. or RCRA/TSCA hazardous. They will be transported by truck for disposal by the appropriate municipal or private entity or subcontractor for offsite management . No D.O.T. placarding of this material shall be required.

2.2 Example of Placards

The above mentioned placard will be vinyl and measure 10.75" x 10.75" and be imprinted with the numbers 2315. The PCB label will be vinyl and measure 6" x 6". An example of this placard and PCB label is included in Attachment B of this plan. If during the completion of the project additional designation placards are required, this plan will be amended to included examples of each.

3.0 Mode and Route of Transportation

3.1. Type of Transporter

The transportation method proposed for this project incorporates bulk solid, bulk liquid, and drum quantity truck carriers.

Bulk solid wastes will be loaded directly into polypropylene-lined aluminum-bodied dump trailers for transport to CWM Chemical Services, Inc.

Bulk liquids will be loaded into vacuum tankers for transport to the aqueous trteatment facility at CWM Chemical Services, Inc.

Any drummed wastes generated at the Site will loaded into a box van trailer for transport to CWM Chemical Services, Inc.

3.2. Transporter Capacity

The bulk solid dump trailers will measure approximately 40' long (outside dimensions), 8' wide (outside dimensions) and 7' high. Each dump trailer will hold approximately 40 cubic yards or between 22-25 tons of material.

The bulk liquids will be transported in vacuum tanker units. Each vacuum tanker measures approximately 30 feet in length and is capable of transporting 3500 gallons of liquid waste.

Drums of waste generated at the Site may be shipped in box van trailers. Each box van is approximately 53' long(outside dimensions), 8' wide(outside dimensions) and 10' 6" high. Each box van utilized will be equipped with a lift gate for ease of loading and can carry approximately (80) 55-gallon drums.

3.3. Anticipated Shipment Frequency

Empty dump trailers for bulk solids will be loaded from outside the temporary storage pad exclusion zone area. All full trailers will be immediately tarped to prevent the infiltration of precipitation and any possible drying/dusting problems.

One vacuum tanker unit will be utilized to transport bulk liquids to CWS Chemical Services aqueous treatment plant. The vacuum unit will load water from the temporary storage tanks at the Site and make multiple delivery rounds per operational day.

Box van trailers for drums will be scheduled as necessary as drums are generated and characterized for disposal during completion of the project.

Office Solid waste will be collected in appropriate containers(dumpsters) onsite and pickup up on a weekly basis by a municipal waste contractor.

Sanitary Facility Wastes will be collected on a minimum weekly basis, or more frequently as required, by the Septic disposal contractor in septic waste vacuum tanker.

3.4 Transportation Route

The bulk solid dump trailers will be called to the site on an as required basis. The trucks will enter the Site by either accessing CWM Chemical Services, Inc., main entrance gate or through a service gate to the south of the TNT/CWS Lines area. Regardless of entry point, the transporters deliveries will be scheduled by Sevenson Environmental and confirmed with the USACE and CWM Chemical Services. Once loaded, they will exit the TNT/CWS Line work area and proceed to CWS Chemical Services scale house for acceptance.

Vacuum tankers will enter the Site through one of these access points and will proceed to the Aqueous Treatment facility along the CWM Site road.

All vehicles for the shipment of drummed waste entering and exiting the Site will utilize these routes. All Municipal Solid wastes and Sanitary Waste transport vehicles will also utilize these routes.

3.5 Temporary Off-Site Storage

All transport vehicles will travel directly to their intended disposal facility. No offsite temporary storage of Site materials is anticipated. Should mechanical failure or driver injury necessitate the unscheduled storage of materials once the vehicle is en route, Sevenson will be immediately notified by the appropriate parties. Sevenson will make the USACE aware of any transport irregularities and will coordinate with USACE to resolve any difficulties.

If possible, the vehicle should be returned to the L.O.O.W. Site or removed to the transporter's own secure facility or service yard until alternate arrangements can be made. If this is not possible, another facilities secured yard or lot will be desirable.

Section 4.0 Regulations

4.1 Weight and Size Limitations

The bulk solid dump tgrailers and their associated transport vehicle furnished by the transporters will have a legal over-the-road weight capacity of 80,000 pounds gross weight. Each tractor and trailer combination will vary slightly in payload capacity, so the driver of the vehicle will be consulted prior to exiting the Site to confirm payload appropriateness.

All other types of transport vehicles will be subject to limitations according to their manufacturers requirements. All hauling weights will be confirmed with the driver and their respective dispatcher prior to the first removal of a particular waste from the Site.

4.2 Vehicle Licensing and Registration Requirements

See Section 1.0 of this Plan.

Section 5.0 Sample Shipping Papers

5.1 Summary and Examples of Completed Shipping Papers

The required shipping papers for each shipment of RCRA/TSCA regulated waste from the Site will consist of an Hazardous Waste Manifest, Landban Disposal Restriction(LDR) Form, a PCB Inventory Form(PCB waste only) and a truckers' bill of lading.

One set of forms will be provided for load. When ready to exit the Site, the truck driver will be presented the completed paperwork. He will sign the manifest as directed, and carry the manifest, LDR, PCB Inventory(as required), and bill of lading in his cab at all times until he arrives at the disposal facility.

All other solids wastes or liquids shall be shipped with the shipping documentation(bill of lading, receipt ticket, etc.) supplied by the appropriate subcontractor.

Section 6.0 Transportation QA Program

6.1 Truck Inspection Criteria and Corrective Action Procedures

Truck Integrity

All truck/transport vehicles should be inspected immediately upon arrival at Site for punctures, cracks, or protrusions. It is the responsibility of the appropriate transportation subcontractor to deliver well-maintained, usable transport vehicles to the Site and the responsibility of Sevenson to determine if the vehicle is fit to carry the specific waste. If the vehicle is not acceptable to Sevenson, the subcontractor shall be notified immediately that the vehicle has been rejected and arrangements shall be made for replacement.

Lining and Tarping Procedures

All bulk solid hazardous waste transport vehicles will be lined with a woven polyethylene liner . The liners will have two end flaps and side flaps which extend over

the edges of the box to protect from contamination. Once loaded, the flaps will be folded into the center of the waste to partially cover the load.

The tarps (top covers) are made of 9 mil woven polypropylene fabric and measure approximately 10' wide x 24' long. The tarps will be secured using braided rope through 16 tie down hooks.

Spill Response Contingency Plan

All transportation subcontractors will have spill response contingency plans for handling spills ranging from small incidental releases to large releases caused by overturns. Small releases onsite will be handled by Sevenson or its subcontractor personnel. Large releases caused by full overturns or offsite incidents will be handled by teams of in-house response crews supplemented by subcontractors as required. Manpower, equipment and materials are handled on a case-by-case basis. Any subcontractor will notify Sevenson in the event that any spillage occurs during transit to its appropriate designation facility. Each truck transporter is required to maintain and follow a Spill Contingency Plan. Notification by the truckers of any incidents shall be made to Sevenson. In turn, Sevenson will notify all appropriate individuals associated with this project of any spill and the response actions being taken.