

# HOW TOMORROW MOVES



# RECENT SUCCESS ACHIEVING REGULATORY CLOSURE OF LOW PROFILE SPILLS AT WESTERN NY RAIL YARD

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# What is a Low Profile Spill?

- Typically older spills, limited area of impact, contained to property
- Minimal risk posed to worker health & safety, the public and the environment



# Why are Low Profile Spills Challenging?

- State Regulatory requirements differ
- Operational needs / Yard staffing differ
- Often situated within sensitive/difficult to access operational areas
- “Default” solution – Leave in-place / long-term monitoring
  - Open-ended costs and compliance issues
  - Continued exposure to regulatory changes



# Benefits of Permanent Closure Strategy

- Minimize/eliminate on-going costs
- Improve site compliance
- Build positive reputation with regulator(s)



*Petroleum Impacted  
Drainage Ditch*



*Reactive Core  
Mat Installation*



*Restored  
Drainage Ditch*



# Step 1: Clarify Goal and Approach

- Identify achievable types of regulatory closures
  - What are the associated data gaps / objectives / cost to achieve?
- Bundle spills if advantageous
  - More available data
  - Risk Drivers/Data Gaps can be addressed from larger area perspective
- Transition from OM&M activities to corrective actions that lead to closure/inactivation
  - OM&M and reporting subject to regulatory changes and undefined timeline



# Step 2: Open Dialogue with Regulatory Authority

- View as a resource, not an obstacle
- Transparency
- Timely updates
- Leverage existing relationships



# Step 3: Commitment to Aggressive, Achievable Schedule

- Identify time-consuming obstacles
- Complete tasks in parallel
- Routinely follow-up when coordinating outside of immediate project team





# Niagara Yard, Niagara Falls, NY

## Three Multi-Year Spill Projects

- Locomotive Derailment
  - *Release of 2,000 gallons diesel*
- Historical Yard Operations
  - *Various petroleum releases in vicinity of Car Shop and fueling areas*
- Oil Water Separator Back-Up
  - *Stormwater collection system routes to OWS*



# Application of Closure Strategy to Spill #2: Historic Operations

Project Dates	April 2008 – April 2014
Corrective Actions Prior to Strategy Implementation	<ul style="list-style-type: none"><li>• Excavation</li><li>• Bioremediation</li><li>• Interceptor Trenches</li><li>• Subsurface Delineation</li><li>• Absorbent Booms</li></ul>
Step 1: Clarify Goal and Approach	<ul style="list-style-type: none"><li>• Reviewed previous Corrective Actions and reports</li><li>• Consolidated info from other nearby spills</li><li>• Final closure approach - reactive core mat (RCM) liner in downstream stormwater ditches</li></ul>
Step 2: Open Dialogue with Regulatory Authority	<ul style="list-style-type: none"><li>• Visited site with DEC</li><li>• Discussed closure approach prior to corrective action implementation</li><li>• Clearly addressed feedback</li></ul>
Step 3: Commitment to Aggressive, but Achievable Schedule	<ul style="list-style-type: none"><li>• Identified bottlenecks and tackled early</li><li>• Simultaneously completed tasks</li><li>• Reduced downtime between mobilizations</li><li>• Developed a single comprehensive closure document</li></ul>

# Lessons Learned

- Identify achievable closure strategy early.
- Understand the regulatory authorities' expectations.
- Leverage data/information from other nearby spills as appropriate.
- Low profile does not equal low priority.



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