WAGNER SEED COMPANY, INC.

SUBSIDIARY OF WAGNER BROS. FEED CORP.

P. O. BOX 479
FARMINGDALE, N. Y. 11735
TEL. 516-293-2920

Copy

MJST, DK
JOHN GREENTHAL
H. BERGER
A. MACHLIN
G. BREZNER
Reg I

FYI

February 19, 1986

Mr. Thomas Kady
On Scene Coordinator
Response and Prevention Branch
EPA Region II
Woodbridge Avenue
Edison, New Jersey 08817

Re: Wagner Seed

Dear Mr. Kady:

Enclosed is a copy of our work plan as required by paragraph 26 of the Order.

Very truly yours,

Walter L. Kircher

WLK:jr
cc: Charles Dolan (2 copies)
Norman Nosenchuck

WORKPLAN FOR REMEDIATION AND INVESTIGATION AT THE WAGNER SEED COMPANY WAREHOUSE

I. Introduction

This workplan is submitted by the Wagner Seed Company, Inc. ("Wagner") to the U.S. Environmental Protection Agency, Region II ("EPA") pursuant to Administrative Order No. II-CERCLA-60202. Paragraph 26 of this Order provides that Wagner shall submit a workplan to EPA for remedial and investigatory activity at the Wagner warehouse located in Farmingdale, New York. This workplan describes various activities, including the removal of the existing warehouse and debris, groundwater investigations, and additional off-site sampling.

As Wagner has discussed with EPA, the purpose of this workplan is to describe, in general terms, the remedial and investigatory activities that will be undertaken. After the EPA has commented on this workplan, Wagner will have the individual contractors prepare a detailed Site Operations Plan that will describe, in specific terms, the work that will be performed. As required by the Order, the Site Operations Plan will also contain quality assurance/quality control plans, health and safety plans, and other relevant documentation.

Wagner intends to utilize various contractors to perform the activities described in this workplan. These contractors are identified in this document and are well-known experts in their respective fields. This workplan will initially address the sampling and disposal of the warehouse structures and debris.

Subsequently, the disposal of the bagged product materials in the warehouse will be described followed by the sampling program that will be performed. The various sections of this workplan have been prepared in conjunction with the contractors that Wagner Seed identifies in each section.

II. Sampling and Disposal of Building and Building Debris

Wagner intends to segregate the warehouse into hazardous and non-hazardous components. This section of the workplan describes the disposal methods that will be employed for hazardous portions of the warehouse and also describes the sampling program that will be employed to determine whether other portions of the warehouse are considered nonhazardous.

This portion of the workplan responds to paragraph 26 (e) and (f) of the Order.

A. Disposal of Hazardous Portions of Warehouse

Wagner intends to dispose of the consumed mid-section of the warehouse that was completely destroyed by the fire as contaminated material. Wagner will dispose of this material in a secure landfill that is licensed to receive hazardous waste. At the present time, it is estimated that there is approximately 1,600 cubic yards of debris in the consumed mid-section of the warehouse. This material will be loaded out of the mid-section of the warehouse and into licensed transport vehicles. Subsequently, the material would be transported to the designated secure landfill. Sampling performed in the consumed mid-section

of the warehouse will be in compliance with the requirements of the cleanup contractor and the operator of the secure landfill.

Wagner expects to retain the services of Chemical Waste Management to perform the on-site removal, transportation, and disposal of this material.

B. Sampling and Disposal of Non-Hazardous Structures

At the present time, the eastern and western portions of the warehouse remain standing. Additionally, a basement exists under the middle and eastern portion of the warehouse. Wagner intends to implement a sampling program to determine whether these structures are contaminated. In the eastern and western portions of the warehouse that remain standing, Wagner Seed will take a total of eight representative core samples from the floor, walls and ceiling. The eight samples from each area will be made into one or more composites depending on site conditions. Additionally, eight representative samples will be taken from the walls and floor of the basement. The basement samples will also be composited into one or more samples depending on site conditions. The composite samples will be analyzed for RCRA characteristics pursuant to 40 C.F.R. § 261, subpart C (ignitability, corrosivity, reactivity, and E.P. toxicity).

If sampling results demonstrate that the standing structures on the eastern and western portions of the warehouse are not considered hazardous, Wagner expects to demolish these structures and dispose of the materials as non-hazardous. To the extent

that materials are identified as being hazardous, Wagner Seed will dispose of these materials in a secure landfill.

To the extent that the sampling shows that the foundation is contaminated, possible decontamination methods will be evaluated. Wagner may utilize high pressure hydroblasting equipment or other decontamination methods. Any contaminated water or other liquids utilized to clean the foundation would be collected, transported and disposed of appropriately.

Wagner has not yet selected a contractor to perform the disposal of the standing structures and any necessary decontamination of the foundation. The plan described in this subsection was prepared in conjunction with Wehran Engineers and Scientists of Middletown, New York.

III. Disposal of Products and Other Materials

This section describes the disposal of products and other materials that are located in the Wagner Seed warehouse and in the adjacent parking lot. This portion of the workplan is responsive to paragraph 26(c) and (d) of the order.

This section will address the following specific materials:

1. Animal food, cedar shavings, and other materials that are stored in the basement of the Wagner Seed warehouse There are approximately 200 tons of these materials located in the basement.

2. Grass seed located in the northwest corner of the warehouse. This part of the warehouse was not consumed by fire and remains in tact. There are 20 to 30 tons of grass seed in this location.

3. 50 to 100 tons of feed and other materials located in the eastern portion of the warehouse.

4. Pieces of trees located in the eastern portion of the LIRR parking lot. These trees were located on adjacent properties that were remediated. The trees were removed to allow soil excavation on the properties.

5. Fencing that was removed from the northern Wagner Seed property line to allow Wagner Seed's cleanup contractor to excavate soil on these properties. This fencing is presently stockpiled in the LIRR parking lot.

6. A wooden shed that was removed from the backyard of 10 Sullivan Street to allow the excavation of soil on the property.

The tree parts, fencing, and wooden shed referred to in paragraphs four, five and six will be disposed of at a local incinerator. There is no reason to believe that these materials are contaminated and no need to conduct additional testing.

The animal food, cedar shavings, and other materials that are presently stored in the basement of the warehouse referred to in paragraph one have been tested in accordance with the New York State Department of Environmental Conservation ("DEC") requirements. The test results are annexed in Attachment One. The parameters tested on these materials were required by the DEC. As demonstrated in the attached sampling results, the vast majority of samples showed non-detectable levels of pesticides and a limited number of samples showed levels in the parts per billion range.

In August and September, 1985, Wagner incinerated several hundred tons of animal food that had been stored in the basement and eastern section of the warehouse. The disposal of this material was conducted under the supervision of the New York State Department of Environmental Conservation. However, the

material that presently remains in the basement had not been sampled at the time and could not be incinterated. Wagner subsequently performed sampling for this remaining material and intends to dispose of these materials at a local incinerator.

The grass seed stored in the northwest corner of the warehouse referred to in paragraph two and the feed and other materials referred to in pargraph three have not yet been tested. Wagner will test these materials in the same manner that the materials in the basement were tested as shown in Attachment One. If these test results show that the materials are not contaminated, Wagner will dispose of these materials at a local incinerator.

Wagner intends to have Pedneault Associates perform the additional testing on the metarials referred to in paragraph two and three. The quality control plan for Pedneault Associates is annexed in Attachment Two. Marine Pollution control would be retained to load and transport the materials to a local incinerator.

IV. Sampling of Excavated Properties

Wagner will take surface soil samples in the backyards of 10, 14 and 18 Sullivan Road, Farmingdale, New York. Samples will be collected near the Wagner property line. The samples will be analyzed for the same parameters required by the New York State Department of Environmental Conservation (lindane, heptachlor, aldrin, heptachlorepoxide, dieldrin and endrin). These properties have been selected for sampling since they would be most subject

to possible re-contamination by run-off from the site. Other properties that were excavated are less subject to recontamination by site run-off. If evidence of re-contamination is found at 10, 14 or 18 Sullivan Road, surface sampling will be similarly conducted at other excavated properties.

This section is responsive to paragraph 26(b) of the Order. Wagner Seed intends to retain Pedneault Associates to perform the sampling.

V. Sampling for Storm Drains, Dry Wells and Catch Basins

Wagner Seed will sample the five catch basins located on the eastern portion of the LIRR parking lot, the two catch basins located on the eastern and western side of Secatogue Avenue immediately north of the Long Island Railroad tracks and the three catch basins located at the intersection of Elizabeth Street and Sullivan Road. To the extent that these catch basins have a soil or sediment bottom, a sediment sample will be collected. If water is present in the catch basin, a water sample will also be collected.

Additionally, the surface waterway to which any of these catch basins discharge will be sampled. A water sample and bottom sediment sample will be collected immediately downstream of the discharge point.

These samples will be analyzed for the same parameters required by the New York State Department of Environmental Conservation (lindane, heptachlor, aldrin, heptachlor-epoxide, dieldrin and endrin).

This section of the workplan is responsive to paragraph 26(a) of the Order.

Wagner Seed will retain Pedneault Associates to perform the sampling described in this section.

VI. Groundwater Studies

Wagner intends to perform the following groundwater investigations. The work described in this section of the workplan was prepared based on discussions with Geraghty & Miller. Four wells will be installed in the shallow aquifer underlying the site. The wells will be located downgradient of the warehouse which would be in the LIRR parking lot and surrounding area. The exact location of these wells will be subject to site conditions and discussions with EPA. At the present time, it is anticipated that some wells will be located near catch basins in the eastern portion of the LIRR parking lot. These catch basins are considered the most likely pathway for contamination to reach the groundwater. It is anticipated that one well will be located just south of the warehouse. Samples from these wells will be analyzed for the same parameters as required by the New York State Department of Environmental Conservation (lindane, heptachlor, aldrin, heptachlor-epoxide, dieldrin, and endrin).

The vertical component of the groundwater flow will be evaluated by utilizing data from nearby Nassau County monitoring wells. There should be adequate vertical separation between the four wells that Wagner Seed will install and the deeper Nassau

County monitoring wells to allow a determination of the vertical component of the groundwater flow.

Wagner will determine the influence of nearby pumping wells on the movement of groundwater in the area. Initially, all public and private pumping wells in the area will be identified. It is anticipated that the only pumping well that may influence groundwater flow will be the public water supply well located approximately 450 yards east of the Wagner Seed company property. The influence of this well on the movement of groundwater in the area will be evaluated by placing a water level recorder on one of the four wells installed by Wagner Seed and determining the water level in this well while the public water supply well referred to above is in a pumping mode. Various factors will be considered including water level readings after pumping is completed and various environmental conditions.

Additionally, a description of use of water taken from all nearby wells will be provided. This section responds to paragraph 26(g), (h) and (k).

It must be noted that installation of wells should await the removal of the warehouse structure and debris since heavy equipment could damage wells and related equipment that are in place.

Wagner Seed expects to retain the services of Geraghty & Miller to perform the work described in this section of the workplan.

VII. Implementation Schedule

Wagner intends to perform the work described in this workplan in accordance with the following schedule. First, the consumed mid-section of the warehouse would be removed and transported to a secure landfill. After this was completed, Wagner would perform the work described in Sections II B and III. Wagner may dispose of the materials described in Section III prior to removal of the consumed mid-section.

After the warehouse was removed, Wagner Seed would implement the sampling programs described in sections IV, V and VI of this workplan. The resampling of the adjacent yards and the catch basins should await the removal of all contaminated materials. Groundwater monitoring should also await the removal of the warehouse materials to avoid interruption of the site remedial activities and destruction of the wells by large equipment.

Prior to the commencement of the work described in the various sections of this workplan, the contractors selected by Wagner will prepare a Site Operations Plan that would be submitted to EPA.

It is impossible to specify dates when the various activities described in this workplan would be performed since it is not known when EPA approvals will be submitted for this workplan and Site Operation Plans. Additionally, the availability of contractor personnel and resources is a factor in determining specific dates for the performance of work.

A map is annexed as Attachment Three which shows the sampling locations described in Sections IV, V and VI of this workplan.

ATTACHMENT I

PEDNEAULT ASSOCIATES, INC. TESTING LABORATORIES
1615 NINTH AVENUE P O BOX 205 BOHEMIA N Y 11716 (516)467-8477
AFTER 5 PM (516)567-5579

October 18, 1985

TO: Mr. Frank Amoroso
Rivkin, Leff, Sherman & Radler
100 Garden City Plaza
Garden City, NY 11530

RE: Wagner's Warehouse Fire

Date: Collected ...9/25/85... Analyzed ..9/25-10/18/85... Report ...10/18/85...

Sampling Point

1. Fire Debris From Basement
2. Sesame Seed
3. Pearl Barley
4. Maple Peas
5. Dakota Millet

Parameters		1	2	3	4	5
Lindane	ug/kg	24.2	< 0.10	< 0.10	< 0.10	< 0.10
Heptachlor	ug/kg	27.1	< 0.10	< 0.10	< 0.10	< 0.10
Aldrin	ug/kg	4.6	< 0.10	< 0.10	< 0.10	< 0.10
Heptachlor-Epoxide	ug/kg	< 0.10	< 0.10	< 0.10	< 0.10	< 0.10
Dieldrin	ug/kg	< 0.10	< 0.10	< 0.10	< 0.10	< 0.10
Endrin	ug/kg	< 0.10	< 0.10	< 0.10	< 0.10	< 0.10
O,P-DDT	ug/kg	< 0.10	< 0.10	< 0.10	< 0.10	< 0.10
		*				

* Many Large Peaks.

JOHN PEDNEAULT
Lab Director

Lab Number 32957

PEDNEAULT ASSOCIATES, INC. TESTING LABORATORIES
1615 NINTH AVENUE P O BOX 205 BOHEMIA N Y 11716 (516) 467-8477
AFTER 5 PM (516) 567 5579

October 18, 1985

TO: Mr. Frank Amoroso
Rivkin, Leff, Sherman & Radler
100 Garden City Plaza
Garden City, NY 11530

RE: Wagner's Warehouse Fire

Date: Collected 9/25/85 **Analyzed** 9/25-10/18/85 **Report** 10/18/85

Sampling Point

1. Sunflower Seed
2. Canary Seed
3. Canary Seed
4. Safflower Seed
5. Peanuts

Parameters		1	2	3	4	5
Lindane	ug/kg	22.4	< 0.10	< 0.10	< 0.10	< 0.10
Heptachlor	ug/kg	< 0.10	< 0.10	< 0.10	2.9	< 0.10
Aldrin	ug/kg	< 0.10	1.9	< 0.10	< 0.10	< 0.10
Heptachlor-Epoxide	ug/kg	< 0.10	< 0.10	< 0.10	< 0.10	< 0.10
Dieldrin	ug/kg	< 0.10	< 0.10	< 0.10	< 0.10	< 0.10
Endrin	ug/kg	< 0.10	< 0.10	< 0.10	< 0.10	< 0.10
O,P-DDT	ug/kg	< 0.10	< 0.10	< 0.10	< 0.10	< 0.10
		*				

* Many Peaks Noted.

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Garden City, NY 11530

RE: Wagner's Warehouse Fire

Date: Collected 9/25/85 **Analyzed** 9/25-10/18/85 **Report** 10/18/85

Sampling Point

1. Wheat
2. Thistle Seed
3. Gravel
4. Sand
5. Oyster Shells

Parameters		1	2	3	4	5
Lindane	ug/kg	< 0.10	< 0.10	< 0.10	< 0.10	< 0.10
Heptachlor	ug/kg	< 0.10	< 0.10	< 0.10	< 0.10	< 0.10
Aldrin	ug/kg	2.7	< 0.10	< 0.10	< 0.10	< 0.10
Heptachlor-Epoxide	ug/kg	< 0.10	< 0.10	< 0.10	< 0.10	< 0.10
Dieldrin	ug/kg	< 0.10	< 0.10	< 0.10	< 0.10	< 0.10
Endrin	ug/kg	< 0.10	< 0.10	< 0.10	< 0.10	< 0.10
O,P-DDT	ug/kg	< 0.10	< 0.10	< 0.10	< 0.10	< 0.10

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Date: Collected 9/25/85 **Analyzed** 9/25-10/18/85 **Report** 10/18/85

Sampling Point

1. Gravel
2. Oyster Shells
3. Peanut Hearts
4. Rape Seed
5. Popcorn

Parameters		1	2	3	4	5
Lindane	ug/kg	<0.10	8.1	5.3	<0.10	8.3
Heptachlor	ug/kg	<0.10	<0.10	<0.10	<0.10	<0.10
Aldrin	ug/kg	<0.10	<0.10	<0.10	<0.10	<0.10
Heptachlor-Epoxide	ug/kg	<0.10	<0.10	<0.10	<0.10	<0.10
Dieldrin	ug/kg	<0.10	<0.10	<0.10	<0.10	<0.10
Endrin	ug/kg	<0.10	<0.10	<0.10	<0.10	<0.10
O,P-DDT	ug/kg	<0.10	<0.10	<0.10	<0.10	<0.10

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RE: Wagner's Warehouse Fire

Date: Collected 9/25/85 Analyzed 9/25-10/18/85 Report 10/18/85

Sampling Point

1. Cedar Shavings
2. Cedar Shavings
3. Gravel
4. Millet
5. Oyster Chick

Parameters		1	2	3	4	5
Lindane	ug/kg	90.1	< 0.10	0.4	18.2	0.4
Heptachlor	ug/kg	< 0.10	< 0.10	< 0.10	< 0.10	< 0.10
Aldrin	ug/kg	< 0.10	< 0.10	0.8	< 0.10	< 0.10
Heptachlor-Epoxide	ug/kg	< 0.10	206	0.3	< 0.10	< 0.10
Dieldrin	ug/kg	< 0.10	< 0.10	< 0.10	< 0.10	< 0.10
Endrin	ug/kg	< 0.10	< 0.10	< 0.10	2.5	< 0.10
O,P-DDT	ug/kg	< 0.10	< 0.10	4.7	8.4	< 0.10

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Date: Collected 9/25/85 Analyzed 9/25-10/18/85 Report 10/18/85

Sampling Point

1. White Rice
2. German Millet
3. Watermelon Seed
4. Pumpkin Seed
5. Hamster Food

Parameters		1	2	3	4	5
Lindane	ug/kg	6.9	< 0.10	7.2	10.1	3.2
Heptachlor	ug/kg	< 0.10	< 0.10	< 0.10	< 0.10	< 0.10
Aldrin	ug/kg	< 0.10	< 0.10	3.6	< 0.10	< 0.10
Heptachlor-Epoxide	ug/kg	< 0.10	< 0.10	< 0.10	< 0.10	< 0.10
Dieldrin	ug/kg	< 0.10	< 0.10	< 0.10	< 0.10	< 0.10
Endrin	ug/kg	< 0.10	< 0.10	< 0.10	< 0.10	< 0.10
O,P-DDT	ug/kg	< 0.10	< 0.10	< 0.10	< 0.10	< 0.10

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Lab Director

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AFTER 5 PM (516) 567-5579

October 18, 1985

TO: Mr. Frank Amoroso
Rivkin, Leff, Sherman & Radler
100 Garden City Plaza
Garden City, NY 11530

RE: Wagner's Warehouse Fire

Date: Collected 9/25/85 **Analyzed** 9/25-10/18/85 **Report** 10/18/85

Sampling Point

1. Dog Food
2.
3.
4.
5.

Parameters		1	2	3	4	5
Lindane	ug/kg	< 0.10				
Heptachlor	ug/kg	< 0.10				
Aldrin	ug/kg	< 0.10				
Heptachlor-Epoxide	ug/kg	< 0.10				
Dieldrin	ug/kg	< 0.10				
Endrin	ug/kg	< 0.10				
O,P-DDT	ug/kg	< 0.10				

JOHN PEDNEAULT
Lab Director

Lab Number 32957

ATTACHMENT II

PEDNEAULT ASSOCIATES, INC. TESTING LABORATORIES
1815 NINTH AVENUE · P.O. BOX 205 · BOHEMIA, N.Y. 11716 · (516) 467-8477
AFTER 5 P.M. (516) 567-5679

QUALITY CONTROL

Tracking: samples entering the laboratory are assigned an accession number and a log page. From there they are routed to the proper laboratory area. At the time of completion of the analyses, the log pages are turned in to be typed. The typed report and the log page are then reviewed by the person generating the results and one other person, usually the Quality control Coordinator before being sent out.

Records: After the report is sent out the second copy is placed in the client's file and the log pages are permanently bound in order of their accession number. This gives us two sets of tests results and the original notes in a permanent record.

Equipment maintenance and calibration; we have the very best maintenance and calibration contracts offered by a New Jersey based firm for all our instrumentation. In addition, all our thermometers, electrical meters (pH, specific ion) and balances are calibrated and maintained on a strict schedule. thermometers and balances are NBS traceable.

Standard Solutions: we are required by the State of new York Department of Health and the United State Food and Drug Adminsitration to label all our in-house standards as to the exact name of preparer and in the case of molar and normal solutions, a minimum number of assays. Also, we are required to keep a "solutions" book on what, how and who prepared them.

Personnel Training: All personnel are encouraged to attend factory seminars, professional meetings, etc. and all have been through factory training on instruments in their area. Perkin-Elmer and Orion have been espcially cooperative in this area.

We are approved for the analyses of potable water supplies by the New York State Department of Health.

We have on file, available for inspection without notice, X Charts, R Charts, replicates, spikes, etc. of sixteen wet chemical methods, fourteen metals, ten volatile organics, five pesticides, and two herbicides.

EQUIPMENT:

4 Perkin Elmer Sigma 1 Series Gas Chromatographs equipped with Electron capture detector, Nitrogen-phosphorus detector, Flame ionization detector, and Thermal conductivity.

1 Hewlett Packard 5970A series Mass Spec.

1 Hewlett Packard 1084B series HPLC

Perkin Elmer model 603 Atomic Absorption Spectrophotometer equipped with HGA 2100 furnace, deuterium are background correction, electrodless discharge and cathode lamps, gas controller, hydride generation and flameless mercury systems.

Perkin Elmer model 337 Infra-red Spectrophotometer equipped with expanded abscissa and expandable ordinate.

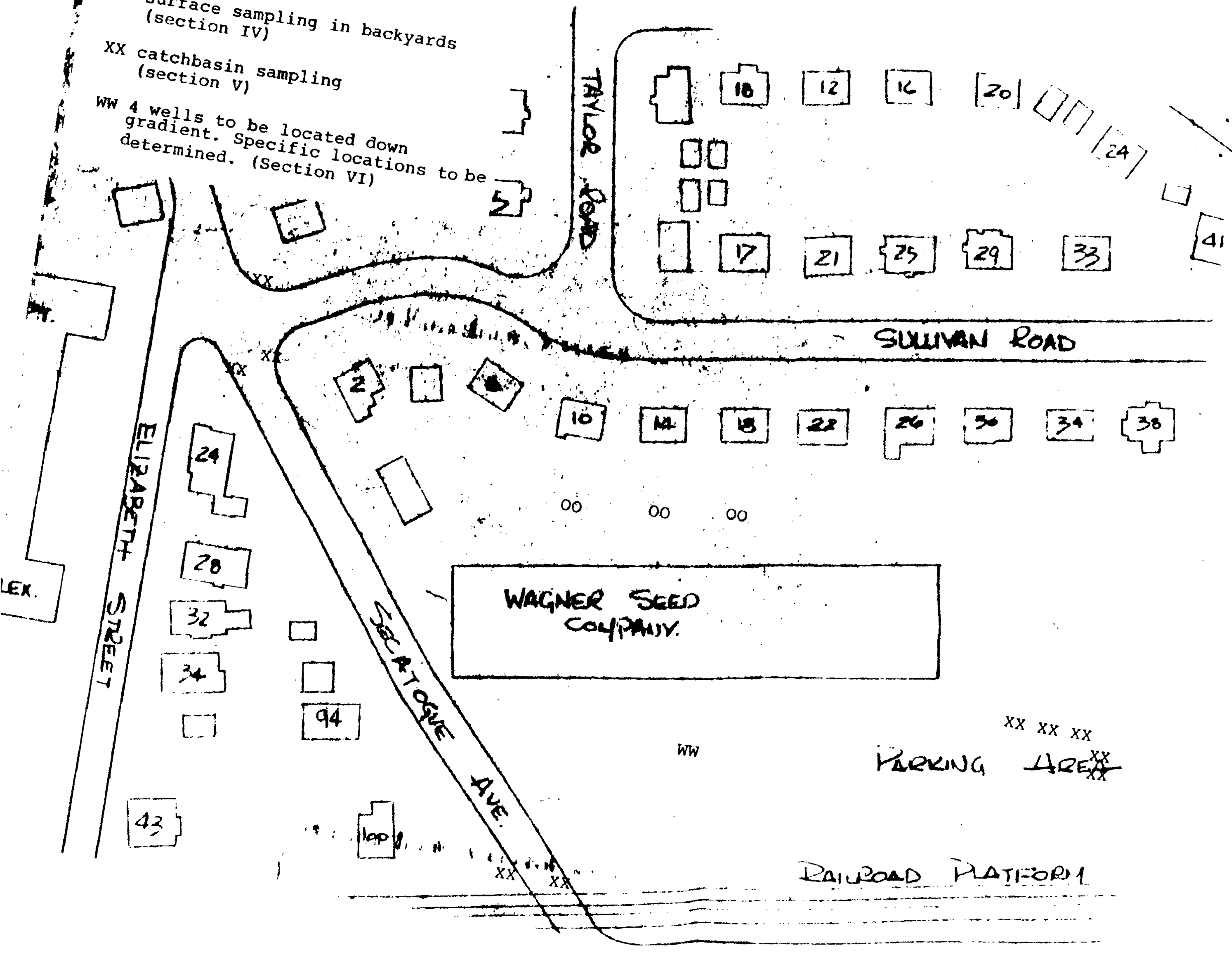
Perkin Elmer model 55 UV - Visable Spectrophotometer equipped with automatic sample intake and flow thru cells.

Bausch & Lomb model 70 UV - Visable Spectrophotometer equipped with 1 cm, 2.5 cm, and 10 cm matched quartz cells.

2 Orion 901 Specific Ion Meter equipped for nitrogen, cyanide, fluoride, and oxygen measurements.

1 Perkin Elmer 300 series with purge and trap system, and PID and Hall detectors.

ATTACHMENT III



Surface sampling in backyards (section IV)
XX catchbasin sampling (section V)
WW 4 wells to be located down gradient. Specific locations to be determined. (Section VI)
TAYLOR ROAD
SULLIVAN ROAD
ELIZABETH STREET
SECATOGUE AVE.
WAGNER SEED COMPANY.
PARKING AREA
RAILROAD PLATFORM
XX
OO
WW
2
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100
LEX.