Report. HW401040.2.10.1987

Preliminary Site Assessment

NUS CORPORATION
A Halliburton Company

COMPLETED

POTENTIAL HAZARDOUS WASTE SITE

PRELIMINARY ASSESSMENT

Niagara Mohawk Operations HQ Site Name	NYD980664338 EPA Site ID Number
1125 Broadway Albany, New York Address	02-8701-48 TDD Number

Date of Site Visit: Off-site Reconnaissance 2/10/87

SITE DESCRIPTION

Niagara Mohawk Operations HQ is a large active facility located in an industrial area between Broadway and Bridge Street off Interstate 90. The site is bounded to the east by the Hudson River, to the west by two-story office buildings, to the north by Interstate 90, and to the south by Bridge Street. In 1986, the NYDEC conducted a site investigation and found PCB's and Mercury stored in 20-25 drums outside the facility. No leaks or spills were observed. The NYDEC concluded no environmental problem or hazard existed.

PRIORITY FOR FURTHER ACTION: High ___ Medium ___ Low X None ___

RECOMMENDATIONS

A site inspection is recommended on a time available basis. The slight potential for leaks or spills as well as the close proximity of the Hudson River to the site warrant soil, groundwater and surface water sampling.

Prepared by: David G. Osinski
of NUS Corporation

Date: 3/17/87

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE LOCATION AND INSPECTION INFORMATION

1. IDENTIFICATION
01 STATE 02 SITE NUMBER
NY D980664338

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site): Niagara Mohawk Operations HQ

02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER: 1125 Broadway

03 CITY: Albany

04 STATE: NY

05 ZIP CODE: 12201

06 COUNTY: Albany

07 COUNTY CODE: 001

08 CONG DIST.: 23

09 COORDINATES

LATITUDE	LONGITUDE
42° 40' 10". N	073° 44' 30". W

10 DIRECTIONS TO SITE (Starting from nearest public road)

From Route 87 N take Exit 23 to Route 787 N. Turn left on Clinton and turn right on Broadway.

III. RESPONSIBLE PARTIES

01 OWNER (if known): Niagara Mohawk Operations HQ

02 STREET (Business, mailing, residential): 1125 Broadway

03 CITY: Albany

04 STATE: NY

05 ZIP CODE: 12201

06 TELEPHONE NUMBER: (518) 471-3800

07 OPERATOR (if known and different from owner)

08 STREET (Business, mailing, residential)

09 CITY

10 STATE

11 ZIP CODE

12 TELEPHONE NUMBER

13 TYPE OF OWNERSHIP (Check one)

X A. PRIVATE ___ B. FEDERAL: _____ (Agency name) ___ C. STATE ___ D. COUNTY ___ E. MUNICIPAL

___ F. OTHER: _____ (Specify) ___ G. UNKNOWN

14. OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)

X A. RCRA 3001 DATE RECEIVED: 6 / 4/ 86 ___ B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: / /

___ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARB

01 ON SITE INSPECTION BY (Check all that apply)

X YES DATE: 06 / 04 / 86 ___ A. EPA ___ B. EPA CONTRACTOR ___ C. STATE ___ D. OTHER CONTRACTOR

___ NO ___ E. LOCAL HEALTH OFFICIAL X F. OTHER: NYDEC (Specify)

CONTRACTOR NAME(S): _____

02 SITE STATUS (Check one)

X A. ACTIVE ___ B. INACTIVE ___ C. UNKNOWN

03 YEARS OF OPERATION

BEGINNING ENDING X UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

A NYDEC site investigation revealed the presence of PCB and Mercury in storage areas both inside and outside the facility.

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

A potential hazard exists if material stored in drums spilled or leaked on the site.

IV. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste information and Part 3 - Description of Hazardous Conditions and Incidents)

___ A. HIGH (Inspection required promptly) ___ B. MEDIUM (Inspection required) X C. LOW (Inspection on time available basis) ___ D. NONE (No further action needed. complete current disposition form)

VI. INFORMATION AVAILABLE FROM

01 CONTACT	02 OF (Agency/Organization)	03 TELEPHONE NUMBER
Diana Messina	U.S. EPA Region 2, Edison, N.J.	(201) 321-6776

04 PERSON RESPONSIBLE FOR ASSESSMENT	05 AGENCY	06 ORGANIZATION	07 TELEPHONE NUMBER	08 OATE
David G. Osinski	U.S. EPA	NUS FIT II	(201) 225-6160	3 / 17/ 87

EPA FORM 2070-12 (7-81)

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 2 - WASTE INFORMATION

1. IDENTIFICATION
01 STATE 02 SITE NUMBER
NY D980664338

II. WASTE STATES, QUANTITIES, AND CHARACTERISTICS

01 PHYSICAL STATES (Check all that apply)

- X A. SOLID
- _ B. POWDER, FINES
- _ C. SLUDGE
- _ D. OTHER: _____ (Specify)
- _ E. SLURRY
- X F. LIQUID
- _ G. GAS

02 WASTE QUANTITY AT SITE (Measures of waste quantities must be independent)

TONS _____
CUBIC YARDS _____
NO. OF DRUMS 25-50

03 WASTE CHARACTERISTICS (Check all that apply)

- X A. TOXIC
- _ B. CORROSIVE
- _ C. RADIOACTIVE
- X D. PERSISTENT
- _ E. SOLUBLE
- _ F. INFECTIOUS
- _ G. FLAMMABLE
- _ H. IGNITABLE
- _ I. HIGHLY VOLATILE
- _ J. EXPLOSIVE
- _ K. REACTIVE
- _ L. INCOMPATIBLE
- _ M. NOT APPLICABLE

III. WASTE TYPE

CATEGORY	SUBSTANCE NAME	01 GROSS AMOUNT	02 UNIT OF MEASURE	03 COMMENTS
SLU	SLUDGE			
OLW	OILY WASTE	Unknown		The wastes are stored in drums
SOL	SOLVENTS			
PSD	PESTICIDES			
OCC	OTHER ORGANIC CHEMICALS			
IOC	INORGANIC CHEMICALS			
ACD	ACIDS			
BAS	BASES			
MES	HEAVY METALS	Unknown		

IV. HAZARDOUS SUBSTANCES (See Appendix for most frequently cited CAS Numbers)

CATEGORY	02 SUBSTANCE NAME	03 CAS NUMBER	04 STORAGE/DISPOSAL METHOD	05 CONCENTRATION	06 MEASURE OF CONCENTRATION
OLW	Polychlorinated Biphenyls	1336-36-3		500	ppm
MES	Mercury	7439-97-6			

V. FEEDSTOCKS (See Appendix for CAS Numbers)

CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER	CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER
FDS			FDS		
FDS			FDS		
FDS			FDS		
FDS			FDS		

VI. SOURCES OF INFORMATION (See specific references. e.g., state files, sample analysis, reports)

1953 - United States Geological Survey Topographical Map, Albany, N.Y. Quad and Troy South Quad.
New York State Department of Environmental Conservation.

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 X A. GROUNDWATER CONTAMINATION 02 OBSERVED (DATE: _____) X POTENTIAL _ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 0 04 NARRATIVE DESCRIPTION

A potential exists for groundwater contamination since 20-25 drums are stored outside the facility. If there is a spill or leakage, the material may infiltrate into the groundwater. The groundwater is not used for drinking purposes.

01 X B. SURFACE WATER CONTAMINATION 02 _ OBSERVED (DATE: _____) X POTENTIAL _ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 93,363 04 NARRATIVE DESCRIPTION

A potential exists for surface water contamination since the Hudson River boarders the facility on the East side. The surface water is not used for drinking purposes.

01 X C. CONTAMINATION OF AIR 02 _ OBSERVED (DATE: _____) X POTENTIAL _ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 148,214 04 NARRATIVE DESCRIPTION

A very slight potential for contamination of air exists from material that may leaked or been spilled onsite.

01 X D. FIRE/EXPLOSIVE CONDITIONS 02 _ OBSERVED (DATE: _____) X POTENTIAL _ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 45,789 04 NARRATIVE DESCRIPTION

A slight potential exists for fire as material is flammable.

01 X E. DIRECT CONTACT 02 _ OBSERVED (DATE: _____) X POTENTIAL _ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 13,749 04 NARRATIVE DESCRIPTION

A slight potential exists since the material stored outside the facility is not completely fenced in.

01 X F. CONTAMINATION OF SOIL 02 _ OBSERVED (DATE: _____) X POTENTIAL _ ALLEGED
03 AREA POTENTIALLY AFFECTED: Unknown (ACRES) 04 NARRATIVE DESCRIPTION

A potential exists for soil contamination since 20-50 drums are stored outside the facility where leakage into the ground may occur.

01 _ G. DRINKING WATER CONTAMINATION 02 _ OBSERVED (DATE: _____) _ POTENTIAL _ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 0 04 NARRATIVE DESCRIPTION

No potential exists for drinking water contamination since the Alcove Reservoir, located about 12 miles south of Albany, provides the drinking water source.

01 X H. WORKER EXPOSURE/INJURY 02 _ OBSERVED (DATE: _____) X POTENTIAL _ ALLEGED
03 WORKERS POTENTIALLY AFFECTED: Unknown 04 NARRATIVE DESCRIPTION

A potential for worker exposure exists since the site is still active.

01 X I. POPULATION EXPOSURE/INJURY 02 _ OBSERVED (DATE: _____) X POTENTIAL _ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 96,363 04 NARRATIVE DESCRIPTION

A potential for contamination of the Hudson River exists if material leaked or was spilled onsite. Since the Hudson River is used for irrigation purposes, the population could be exposed to the material.

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 X J. DAMAGE TO FLORA — 02 _ OBSERVED (DATE: _____) X POTENTIAL _ ALLEGED
04 NARRATIVE DESCRIPTION

A potential exists for damage to flora if any contaminants leaked or were spilled.

01 X K. DAMAGE TO FAUNA — 02 _ OBSERVED (DATE: _____) X POTENTIAL _ ALLEGED
04 NARRATIVE DESCRIPTION (Include name(s) of species)

A potential exists for damage to fauna if any contaminants leaked or were spilled.

01 X L. CONTAMINATION OF FOOD CHAIN — 02 _ OBSERVED (DATE: _____) X POTENTIAL _ ALLEGED
04 NARRATIVE DESCRIPTION

A potential exists for contamination of food chain if any contaminants leaked or were spilled.

01 X M. UNSTABLE CONTAINMENT OF WASTES (Spills/runoff/standing liquids/leaking drums) — 02 _ OBSERVED (DATE: _____) X POTENTIAL _ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 13,749 — 04 NARRATIVE DESCRIPTION

A slight potential for unstable containment of wastes exists since the drums stored outside the facility may leak onto the ground.

01 X N. DAMAGE TO OFFSITE PROPERTY — 02 _ OBSERVED (DATE: _____) X POTENTIAL _ ALLEGED
04 NARRATIVE DESCRIPTION

A slight potential exists for damage to offsite property. If there is a spill or leak from the drums, the material may migrate to the Hudson River.

01 X O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPs — 02 _ OBSERVED (DATE: _____) X POTENTIAL _ ALLEGED
04 NARRATIVE DESCRIPTION

A potential for contamination of sewers exists since there are sewers present at the site. If there is a spill or leak from the drums, the material may contaminate the sewers.

01 X P. ILLEGAL/UNAUTHORIZED DUMPING — 02 _ OBSERVED (DATE: _____) X POTENTIAL _ ALLEGED
04 NARRATIVE DESCRIPTION

A potential for illegal dumping exists since the site is not completely fenced-in.

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

No other environmental problem or hazard is known to exist.

III. TOTAL POPULATION POTENTIALLY AFFECTED: 148,214

IV. COMMENTS

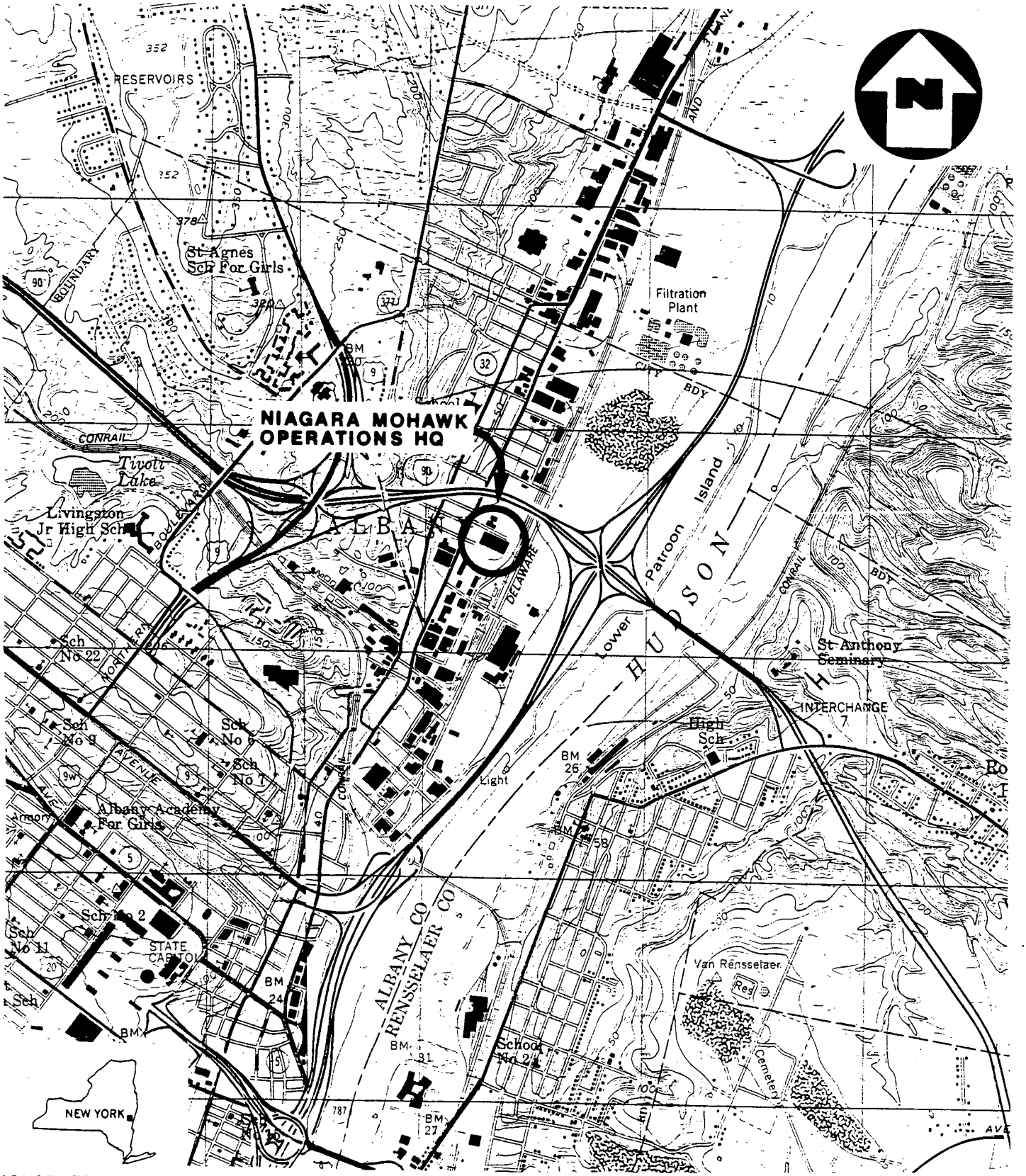
In 1986, the NYDEC conducted a reconnaissance and waste inspection. According to their findings, no environmental problem or hazard is known to exist.

V. SOURCES OF INFORMATION (Cite specific references. e.g., state files, sample analysis, reports)

2/10/87 - Offsite Reconnaissnace, NUS Corporation, FIT II.
New York State Department of Environmental Conservation.
General Software Corporation. 1984 Draft Graphical Exposure Modeling System (GEMS) User's Guide.

APPENDIX A

MAPS AND PHOTOGRAPHS



(QUAD) TROY SOUTH, N.Y.

FIGURE 1

SITE LOCATION MAP

NIAGARA MOHAWK OPERATIONS HQ, ALBANY, N.Y.

SCALE: 1" = 2000'

NUS CORPORATION

A Halliburton Company

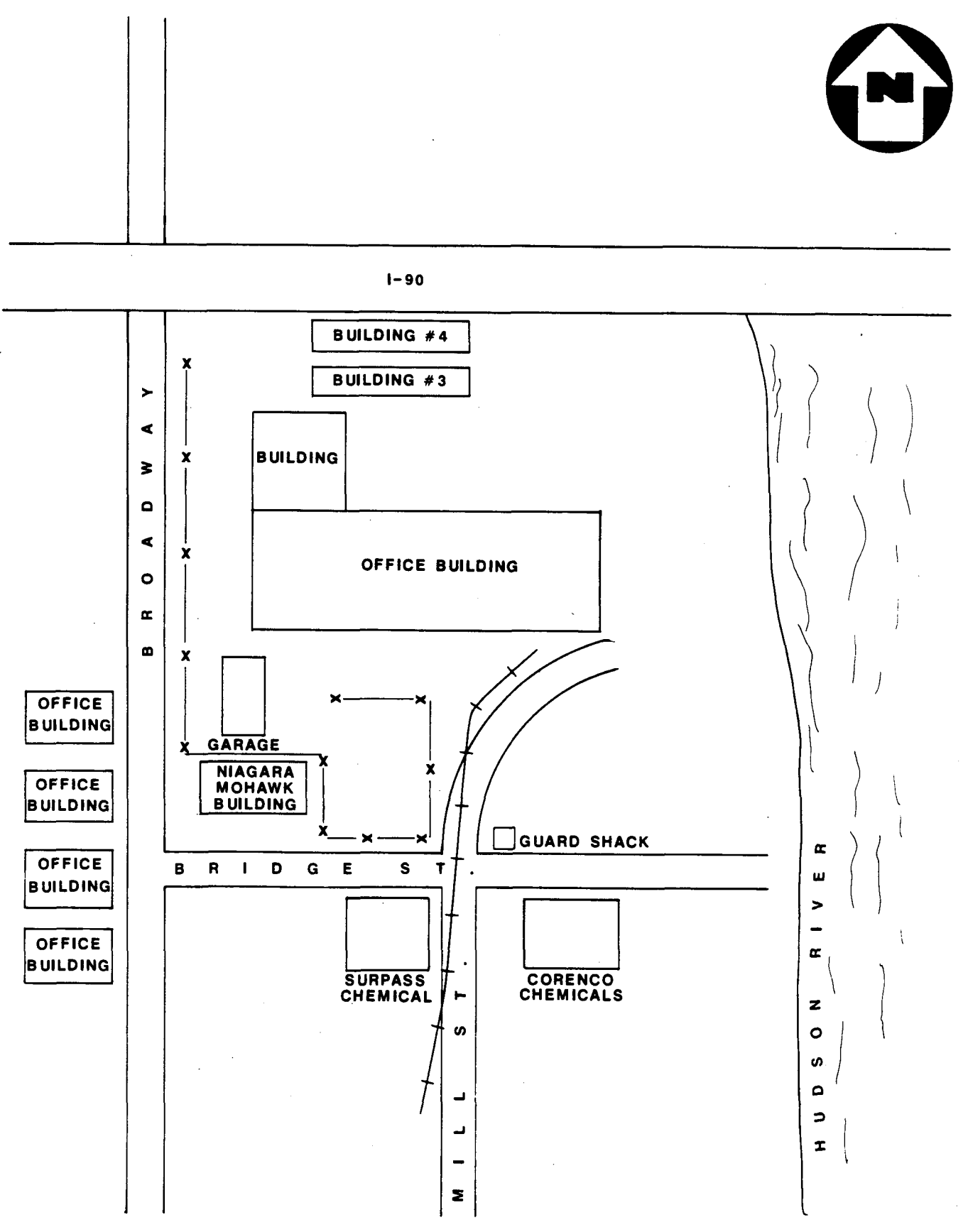


FIGURE 2

SITE MAP
NIAGARA MOWHAWK
OPERATIONS HQ, ALBANY, N.Y.

NOT TO SCALE

NUS CORPORATION
A Halliburton Company

NIAGARA MOHAWK OPERATIONS HQ
ALBANY, NEW YORK
TDD #02-8701-48
FEBRUARY 10, 1987

PHOTOGRAPH LOG

NIAGARA MOHAWK OPERATIONS HQ
ALBANY, NEW YORK
TDD #02-8701-48
FEBRUARY 10, 1987

PHOTOGRAPH INDEX

ALL PHOTOGRAPHS TAKEN BY SCOTT KRALL

Photo Number	Description	Time
1P-1	View from the west corner of the site, across Bridge Street, looking north.	1610
1P-2	View from the east corner of the site, across Mill Street, looking northwest.	1615

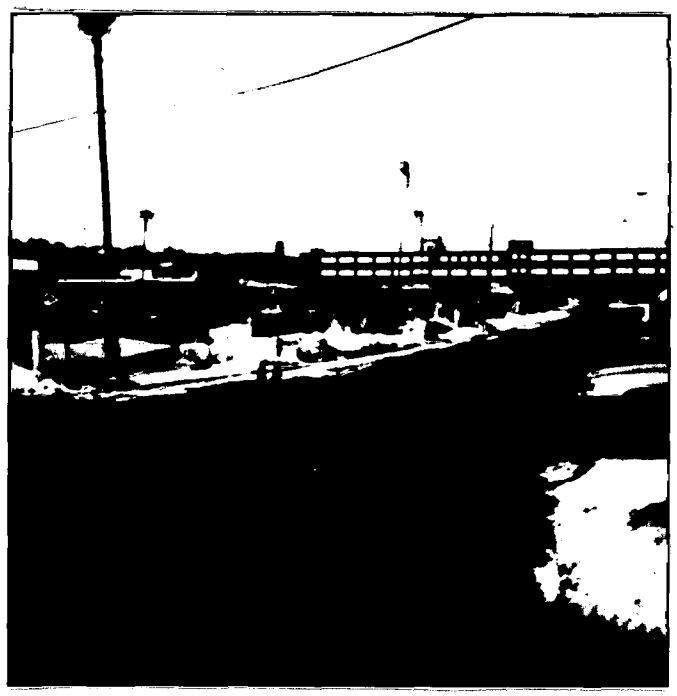
NUS CORPORATION

NIAGARA MOHAWK OPERATIONS HQ, ALBANY, NEW YORK

1P-1 February 10, 1987 1610
View from the west corner of the site, across Bridge Street, looking north.
Photographer: Scott Krall

NUS CORPORATION

NIAGARA MOHAWK OPERATIONS HQ, ALBANY, NEW YORK



1P-2 February 10, 1987 1615
View from the east corner of the site, across Mill Street, looking northwest.
Photographer: Scott Krall

APPENDIX B

BACKGROUND INFORMATION

GO

Data List of Dataset: NY02 Number of Records = 6

REC #	POP	HOUSE	DISTANCE	SECTOR
1	400	189	0.400000 0-¼	1
2	4674	1844	0.810000 ¼-½	1
3	8675	4048	1.60000 ½-1	1
4	32040	18468	3.20000 1-2	1
5	50574	20802	4.80000 2-3	1
6	51851	18215	6.40000 3-4	1

42° 40′ 10″ Lat.
73° 44′ 30″ Long.

Products of combustion of polyamide-6 in furnace maintained at 800 degrees centigrade (APFRAD 35,461,77)

TOXICITY DATA:	3	CODEN:
ihl-mus LC50:23 mg/m3/10M		APFRAD 35,461,77

Reported in EPA TSCA Inventory, 1980.
THR: HIGH ihl.

POLYAMINE D

NIOSH #: TQ 0525000

TOXICITY DATA:	2	CODEN:
skn-rbt 500 mg open MLD		UCDS** 4/1/64
eye-rbt 50 mg SEV		UCDS** 4/1/64
orl-rat LD50:2590 mg/kg		UCDS** 4/1/64
skn-rbt LD50:880 mg/kg		UCDS** 4/1/64

THR: MOD orl, skn. Skn and eye irr.
Disaster Hazard: When heated to decomp it emits tox fumes of NO_x.

POLYAMINE T

NIOSH #: TQ 0600000

TOXICITY DATA:	3-1	CODEN:
skn-rbt 500 mg open MLD		UCDS** 7/16/65
orl-rat LD50:7460 mg/kg		UCDS** 7/16/65
skn-rbt LD50:20 mg/kg		UCDS** 7/16/65

THR: HIGH skn; LOW orl. A skn irr.
Disaster Hazard: When heated to decomp it emits tox fumes of NO_x.

beta-POLY(1,3-BUTADIENE)STYRENE, COPOLYMER

CAS RN: 9003558 NIOSH #: WL 6000000

SYN: KOPOLYMER BUTADIEN STYRENOVY (CZECH)

TOXICITY DATA:	2	CODEN:
eye-rbt 500 mg/24H MOD		28ZPAK -,257,72

Reported in EPA TSCA Inventory, 1980.
THR: An eye irr.
Disaster Hazard: When heated to decomp it emits acrid smoke and fumes.

POLYCHLORINATED BIPHENYLS

CAS RN: 1336363 NIOSH #: TQ 1350000

Bp: 340°-375°, flash p: 383°F (COC), d: 1.44 @ 30°. For toxicity information, see individual mixtures below. A series of technical mixtures consisting of many isomers and compounds that vary from mobile oily liquids to white crystalline solids and hard noncrystalline resins. Technical products vary in composition, in the degree of chlorination and possibly according to batch (IARC** 7,262,74).

SYNS:

AROCLOR	CHLOREXTOL
CHLOPHEN	CHLORO BIPHENYL
CHLORINATED BIPHENYL	CHLORO-1,1-BIPHENYL
CHLORINATED DIPHENYL	CLOPHEN
CHLORINATED DIPHENYLENE	KANECHLOR S
NOFLAMOL	PYRALENE
PCBS	PYRANOL
PHENOCHLOR	SANTOTHERM
POLYCHLORINATED BIPHENYL	THERMINOL FR-1
POLYCHLOROBIPHENYL	

TOXICITY DATA:
Carcinogenic Determination: Human Suspected IARC** 18,43,78. *Toxicology Review:* EVHPAZ 1,105,72; JOCMA7 18,109,76; FEPRA7 34,1675,75; ARVPAX 14,139,74; ARPAAQ 94,125,72; CHRYAQ 49(4), 14,76; STEVA8 2(4),305,74; BISNAS 20,958,70; 27ZTAP 3,34,69. Occupational Exposure to Polychlorinated Biphenyls recm std: Air: TWA 1.0 ug/m3 NTIS**. "NIOSH Manual of Analytical Methods" VOL 1 244,253, VOL 2 S121, VOL 4 S120*. NIOSH Current Intelligence Bulletin 7, 1975. Reported in EPA TSCA Inventory, 1980. EPA TSCA 8E No: 07780209-Followup Reply Received as of April, 1979.
THR: A susp hmn CARC. HIGH-MOD acute orl, ihl, skn. Also causes a chloracne. Like the chlorinated naphthalenes, the chlorinated diphenyls have two distinct actions on the body, namely, a skn effect and a toxic action on the liver. The lesion produced in the liver is an acute yellow atrophy. This hepato toxic action of the chlorinated diphenyls appears to be increased if there is exposure to carbon tetrachloride at the same time. The higher the chlorine content of the diphenyl compound, the more toxic is it liable to be. Oxides of chlorinated diphenyls are more tox than the unoxidized materials. The skin lesion is known as chloracne, and consists of small pimples and dark pigmentation of the exposed areas, initially. Later, comedones and pustules develop. In persons who have suffered systematic intoxication, the usual signs and symptoms are nausea, vomiting, loss of weight, jaundice, edema and abdominal pain. Where the liver damage has been severe the patient may pass into coma and die.
Fire Hazard: Slight, when exposed to heat or flame.
Disaster Hazard: Dangerous; when heated to decomp, they emit highly tox fumes.
For further information see PCB's, Vol. 3, No. 4 of *DPIM Report.*

POLYCHLORINATED BIPHENYL (AROCLOR 1221)

CAS RN: 11104282 NIOSH #: TQ 1352000

SYNS:

AROCHLOR 1221	CHLORODIPHENYL (21% Cl)

TOXICITY DATA:	2	CODEN:
orl-rbt LD50:3980 mg/kg		ARVPAX 14,139,74
skn-rbt LDLo:3169 mg/kg		ARVPAX 14,139,74

Carcinogenic Determination: Human Suspected IARC** 18,43,78. *Toxicology Review:* ARVPAX 14,139,74; RREVAH 44,1,73; STEVA8 2(4),305,74; BISNAS 20,958,70. Occupational Exposure to Polychlorinated Biphenyls recm Std: Air: TWA 1.0 ug/m3 NTIS**.
THR: MOD orl, skn. Susp hmn CARC. See also PCB's.
Disaster Hazard: When heated to decomp it emits tox fumes of Cl^-.

SYN: MERCURY NUCLEATE, SOLID (DOT)

TOXICITY DATA: 3

DOT: Poison B, Label: Poison FEREAC 41,57018,76. Occupational Exposure to Inorganic Mercury recm std: Air: TWA 0.05 mg(Hg)/m3 NTIS**.

THR: A poison. See also mercury compounds.

Disaster Hazard: When heated to decomp it emits tox fumes of Hg.

MERCUROPHEN

CAS RN: 17140737 NIOSH #: OW 4550000
mf: $C_6H_4HgNO_4 \cdot Na$; mw: 377.70

Brick-red odorless powder. Sol in hot H_2O.

TOXICITY DATA: 3	CODEN:
ivn-rat LDLo:8 mg/kg	12VXA5 8,661,68
ims-rat LDLo:12 mg/kg	12VXA5 8,661,68
ivn-rbt LDLo:4 mg/kg	12VXA5 8,661,68

Occupational Exposure to Inorganic Mercury recm std: Air: TWA 0.05 mg(Hg)/m3 NTIS**.

THR: HIGH ivn, ims. See also mercury compounds. Poison.

Disaster Hazard: When heated to decomp it emits very tox fumes of NO_x and Hg vapors.

MERCUROPHYLLINE

CAS RN: 8012348 NIOSH #: OV 8650000

SYNS:
MERCUPURIN
MERCUZANTHIN

TOXICITY DATA: 3-2	CODEN:
ivn-hmn TDLo:28 mg/kg:CNS	JAMAAP 117,1806,41
scu-mus LD50:163 mg(Hg)/kg	JPETAB 105,336,52
ivn-mus LD50:1410 mg/kg	JPETAB 99,149,50
ivn-cat LDLo:250 mg/kg	JPETAB 99,149,50
ivn-rbt LDLo:177 mg/kg	JPETAB 99,149,50

Occupational Exposure to Inorganic Mercury recm std: Air: TWA 0.05 mg(Hg)/m3 NTIS**.

THR: A hmn CNS. HIGH scu, ivn. MOD ivn. See also mercury compounds.

Disaster Hazard: When heated to decomp it emits tox fumes of Hg.

MERCUROUS CHLORIDE

CAS RN: 7546307 NIOSH #: OV 8750000
mf: Cl_2Hg_2; mw: 472.09

White, odorless, tasteless, heavy powder or crystals. Sunlight causes it to decomp into mercuric chloride and metallic Hg. Insol in H_2O, alc and ether. Protect from light. Subl @ 400°; d: 7.150.

SYNS:
MERCURY(I) CHLORIDE
C.I. 77764
CALOMEL
CALOMELANO (ITALIAN)
CHLORURE MERCUREUX (FRENCH)
CLORURO MERCUROSO (ITALIAN)
KALOMEL (GERMAN)
MERCUROCHLORIDE (DUTCH)
MERCURY MONOCHLORIDE
MERCURY PROTOCHLORIDE
MILD MERCURY CHLORIDE
QUECKSILBER(I)-CHLORID (GERMAN)
SUBCHLORIDE OF MERCURY

TOXICITY DATA: 3	CODEN:
mrc-bcs 50 mmol/L	MUREAV 77,109,80
orl-rat LD50:210 mg/kg	WRPCA2 9,119,70

Toxicology Review: SDGTB3 1(2),177,71; RREVAH 42,103,72; 27ZTAP 3,91,69. Occupational Exposure to Inorganic Mercury recm std: Air: TWA 0.05 mg(Hg)/m3 NTIS**. Reported in EPA TSCA Inventory, 1980.

THR: MUT data. HIGH orl. See also mercury compounds.

Disaster Hazard: When heated to decomp it emits very tox fumes of Cl^- and Hg.

Human Tox: Excessive doses may cause Hg poisoning.

Antidote: BAL (Dimercaprol). If laxation from oral mercurous chloride should not occur, saline laxative must be administered to prevent possibility of Hg poisoning.

Med Incomp: Bromides, iodides, alkali chlorides, sulfates, sulfites, carbonates, hydroxides, lime water, acacia, ammonia, golden antimony sulfide, cocaine, cyanides, copper salts, hydrogen peroxide, iodine, iodoform, Pb salts, silver salts, soap, sulfides.

MERCURY

CAS RN: 7439976 NIOSH #: OV 4550000
af: Hg; aw: 200.59

Silvery liquid, metallic element. mp: −38.89°, bp: 356.9°, d: 13.546, vap. press: 1 mm @ 126.2°. vap press: @ 25° = 2×10^{-3} mm.

SYNS:
COLLOIDAL MERCURY
KWIK (DUTCH)
MERCURE (FRENCH)
MERCURIO (ITALIAN)
MERCURY, METALLIC (DOT)
NCI-C60399
QUECKSILBER (GERMAN)
QUICK SILVER
RTEC (POLISH)

TOXICITY DATA: 3	CODEN:
ihl-rat TCLo:890 ng/m3/24H (16W male)	GISAAA 45(3),72,80
ihl-rat TCLo:7440 ng/m3/24H (16W male)	GISAAA 45(3),72,80
ipr-rat TDLo:400 mg/kg/14D-I:ETA	ZEKBAI 61,511,57
ihl-wmn TCLo:150 ug/m3/46D:GIT	AEHLAU 33,186,78
ihl-wmn TCLo:150 ug/m3/46D:CNS	AEHLAU 33,186,78
ihl-rbt LCLo:29 mg/m3/30H	AMIHBC 7,19,53

TLV: Air: 0.05 mg(Hg)/m3 (skin) DTLVS* 4,254,80. *Toxicology Review:* AJOGAH 126(3),390,76; JTEHD6 2(3),491,77; TRBMAV 33(1),85,75; PHJOAV 213(5781),159,74; JDSCAE 58(12),1767,75; CPEDAM 13,783,74; QURBAW 7(1),75,74; AEMBAP 48,463,74; JAVMA4 164(3),277,74; 31ZNAA 2,365,73; AEMBAP 40,239,73; CTOXAO 5(2),151,72; BIOGAL 41(7),208,75; ADTEAS 5,51,72; RREVAH 42,103,72; FOREAE 7,313,42; NISIA9 27(9),942,74; MIBUBI 9(4),321,75; STEVA8 2(4),341,74; ENVRAL 13,36,77; 85CVA2 5,63,70; JOCMA7 2,337,60; PEXTAR 12,102,69; PDTNBH 6,204,77.

OSHA Standard: Air: CL 1 mg/10m3 (SCP-N) FEREAC 39,23540,74. DOT: ORM-B, Label: None FEREAC 41,57018,76. Occupational Exposure to Inorganic Mercury recm std: Air: TWA 0.05 mg(Hg)/m3 NTIS**. "NIOSH Manual of Analytical Methods" VOL 1

145,165,167, VOL 4 S199*, VOL 5 175#. Reported in EPA TSCA Inventory, 1980.

THR: A hmn GIT, CNS. An exper ETA. HIGH ihl. See also mercury compounds. Reacts violently with acetylene, NH_3, BPI_2, Cl_2, ClO_2, CH_3N_3, Na_2C_2, nitromethane, (butyne diol + acid).

Incomp: Acetylenic compounds; ammonia; boron diiodophosphide; ethylene oxide; metals; methyl azide; methylsilane, oxygen; oxidants; tetracarbonylnickel, oxygen.

For further information see Vol. 1, No. 3 of *DPIM Report.*

MERCURY AMIDE CHLORIDE

CAS RN: 10124488 NIOSH #: OV 7020000
mf: ClH_2HgN; mw: 252.07

White pulverulent lumps or powder.

SYNS:

AMINOMERCURIC CHLORIDE
MERCURIC AMMONIUM CHLORIDE, SOLID
MERCURIC CHLORIDE, AMMONIATED
MERCURY AMINE CHLORIDE
MERCURY AMMONIATED
WHITE MERCURY PRECIPITATED
WHITE PRECIPITATE

TOXICITY DATA:

Aquatic Toxicity Rating: TLm96:under 1 ppm WQCHM* 3,-,74. *Toxicology Review:* SDGTB3 1(2),177,71; 27ZTAP 3,15,69. DOT: Poison B, Label: Poison FEREAC 41,57018,76. Occupational Exposure to Inorganic Mercury recm std: Air: TWA 0.05 mg(Hg)/m3 NTIS**. Reported in EPA TSCA Inventory, 1980.

THR: A poison. See also mercury compounds.

Disaster Hazard: When heated to decomp it emits very tox fumes of Cl^-, NO_x and Hg.

MERCURY(II)-o-ARSENATE

CAS RN: 7784374 NIOSH #: OV 7040000
mf: $AsHO_4 \cdot Hg$; mw: 340.52

Yellow powder; mp: decomp. Insol in H_2O, sol in HCl or HNO_3.

SYN: MERCURIC ARSENATE

TOXICITY DATA: 3

Aquatic Toxicity Rating: TLm96:under 1 ppm WQCHM* 3,-,74. Occupational Exposure to Inorganic Mercury recm std: Air: TWA 0.05 mg(Hg)/m3 NTIS**. Occupational Exposure to Inorganic Arsenic recm std: Air: CL 2 ug/m3/15M NTIS**.

THR: A poison. See also mercury and arsenic compounds.

Disaster Hazard: When heated to decomp it emits very tox fumes of Hg and As.

MERCURY(I) AZIDE

mf: Hg_2N_6; mw: 485.22

THR: Explodes on heating in air. HIGH tox. See also azides, mercury compounds.

Disaster Hazard: When heated to decomp it emits very tox fumes of NO_x and Hg.

MERCURY(II) AZIDE

mf: HgN_6; mw: 284.65

THR: High friction sensitivity; brisance on explosion. HIGH tox. See also mercury compounds, azides.

Disaster Hazard: When heated to decomp it emits very tox fumes of Hg and NO_x.

MERCURY(II) BENZOATE

CAS RN: 583153 NIOSH #: OV 7060000
mf: $C_{14}H_{10}O_4 \cdot Hg$; mw: 442.83

White crystalline powder; odorless. mp: 165°. Very sol in NaCl soln; slightly sol in alc. Protect from light.

SYNS:

MERCURIC BENZOATE
MERCURIC BENZOATE, SOLID (DOT)

TOXICITY DATA: 3

Aquatic Toxicity Rating: TLm96:under 1 ppm WQCHM* 3,-,74. DOT: Poison B, Label: Poison FEREAC 41,57018,76. Occupational Exposure to Inorganic Mercury recm std: Air: TWA 0.05 mg(Hg)/m3 NTIS**.

THR: A poison. See also mercury compounds.

Disaster Hazard: When heated to decomp it emits tox fumes of Hg.

MERCURY(I) BROMIDE (1:1)

CAS RN: 10031182 NIOSH #: OV 7410000
mf: BrHg; mw: 280.50

White-yellow tetrg cryst or powder; odorless. d: 7.307; vap d: 19.3. Darkens on exposure to light. Sublimes @ approx 390° (decomp); Insol in H_2O, alc, ether; decomp by hot HCl or alkali bromides. Protect from light.

SYN: MERCUROUS BROMIDE, SOLID (DOT)

TOXICITY DATA: 3

Aquatic Toxicity Rating: TLm96:under 1 ppm WQCHM* 3,-,74. DOT: Poison B, Label: Poison FEREAC 41,57018,76. Occupational Exposure to Inorganic Mercury recm std: Air: TWA 0.05 mg(Hg)/m3 NTIS**.

THR: A poison. See also mercury compounds and bromides.

Disaster Hazard: When heated to decomp it emits very tox fumes of Br^- and Hg.

MERCURY(II) BROMIDE (1:2)

CAS RN: 7789471 NIOSH #: OV 7415000
mf: Br_2Hg; mw: 360.41

White crystals or cryst powder. Sensitive to light; mp: 237°; bp: 322° (sublimes); d: 6.109 @ 25°; vap press: 1 mm @ 136.5°; sublimes @ higher temp; very sol in hot alc, methanol, HCl, HBr, alkali bromide solns; slightly sol in chloroform.

SYNS:

MERCURIC BROMIDE
MERCURIC BROMIDE, SOLID (DOT)

NUS CORPORATION AND SUBSIDIARIES — **TELECON NOTE**

CONTROL NO:	DATE:	TIME:
	2/3/87	0820

DISTRIBUTION:
file - Niagara Mohawk Operations HQ
NYB2 02-8701-48

BETWEEN:	OF:	PHONE:
Gary Johnson	NYDEC	(518) 382-0680

AND:

DISCUSSION:

To inquire information needed to complete a PA.
Another call was made at 0850.
Location of site: 1125 Broadway
The NYDEC conducted a waste Inspection (Recon) on June 4, 1986.
Material found on site: transformers, drums and storage areas { 50 drums inside facility
20-25 drums outside facility
Substances contained in drums: PCB's and Mercury
The concentration of PCB's: 50-500 ppm.
Population potentially affected: unknown
According to the NYDEC Report, no environmental hazards or problems exists.

ACTION ITEMS:
No future plans will be conducted on site.

NUS 067 REVISED 0685

David G Osinski

NUS CORPORATION AND SUBSIDIARIES — **TELECON NOTE**

CONTROL NO:	DATE:	TIME:
	3/17/87	1550

DISTRIBUTION:

file - Niagara Mohawk Operations HQ / Albany

02-8701-48 NYB2

BETWEEN:	OF:	PHONE:
Cliff Forando	Albany County Health Dept.	(518) 445-7811

AND:

DISCUSSION:

To determine what is the drinking water source for the area around this site.

Groundwater and surfacewater is not used for drinking purposes.

Residents use the water from the City of Albany ie, Alcove Reservoir.

ACTION ITEMS:

NUS 067 REVISED 0685

David G. Osinski

NUS CORPORATION AND SUBSIDIARIES — TELECON NOTE

CONTROL NO:	DATE:	TIME:
	3/18/87	0845

DISTRIBUTION:
File - Niagara Mohawk Operations HQ / Albany
02-8701-48 NYB2.

BETWEEN:	OF:	PHONE:
Peter D. Illo	Albany County Health Dept	(518) 434-5148

AND:

DISCUSSION:

To determine if sewers are present at this site.

Yes.

Blueprints are available at City Hall (Albany) 3rd floor, should anyone like to have copies made for documentation / information purposes.

ACTION ITEMS:

NUS 067 REVISED 0685

DAVID G. OSINSKI

NIAGARA MOHAWK POWER CORPORATION/300 ERIE BOULEVARD WEST, SYRACUSE, N.Y. 13202/TELEPHONE (315) 474-1511

April 14, 1986

Mr. Irving Bonsel
Regional Solid and Hazardous Waste Engineer
New York State Department of
Environmental Conservation
Region 4
2176 Guilderland Avenue
Schenectady, NY 12306

Re: North Albany Service Center
Hazardous Waste Storage Facility
Closure Plan and Closure Cost Estimate
EPA I.D. Number NYD000730408

Dear Sir:

In accordance with Mr. Paul Counterman's undated letter received March 26, 1986, Niagara Mohawk Power Corporation submits the requested Closure Plan and Closure Cost Estimate for the above cited storage facility.

If you have any questions on this matter, please call the undersigned at (315) 428-6616.

Respectfully,

Frank J Grabowski

F. J. Grabowski
Environmental Analyst

FJG:dd

Enclosure

xc: J. M. Toennies
B. Ross

HAZARDOUS WASTE MANAGEMENT FACILITY

CLOSURE PLAN

FACILITY NAME:	North Albany Service Center
FACILITY ADDRESS:	1125 Broadway Albany, New York 12204
EPA/NYS I.D. NUMBER:	NYD000730408
FACILITY CONTACT:	Brian Ross
PHONE(S):	(518) 471-3502
CORPORATE CONTACT:	John M. Toennies
PHONE(S):	(315) 474-1511 Ext. 6627
ADDRESS:	300 Erie Boulevard West Syracuse, New York 13202

Closure Plan

Since this is a hazardous waste storage facility, closure will be divided into the following parts - tanks, containers, equipment, and building:

(1) Tanks - At closure, all tanks and associated piping will be emptied of any free-flowing liquid and rinsed, three times, with a solvent in which PCBs are readily soluble. The resultant waste will be shipped off-site to a properly permitted facility.

(2) Containers - At closure, those containers that are empty of any free-flowing liquid will be rinsed three times with a solvent in which PCBs are readily soluble. The resultant waste and containers containing waste material will be shipped off-site to a properly permitted facility.

(3) Equipment and PCB storage shed (berm and floor) will be decontaminated by swabbing the surfaces with a solvent in which PCBs are readily soluble. The resultant waste and containers containing waste material will be shipped off-site to a properly permitted facility.

Decontamination Procedures: NMPC will hire a clean-up and disposal contractor, who is experienced in the area of decontaminating PCB storage containers and tanks. After decontamination the contractor will be required to obtain a representative sample of the waste for analysis, using the method specified in Appendix 19 of Part 371 for containerized liquid wastes. The testing procedures which the contractor will be required to use are those specified under Appendix 21 of Part 371 and 40 CFR 761.60(g). After sampling and analysis are completed, the decontaminated waste material will be shipped off-site to a properly permitted facility by a hired contractor.

Closure activities will commence within 90 days of the time when the North Albany TSD facility no longer receives PCB and/or mercury-containing wastes for storage. The estimated final closure milestones are as follows:

Milestone #1

It is estimated that the North Albany TSD facility would no longer receive PCB oil, PCB solids, capacitors or mercury after December 31, 2007.

Milestone #2

It is tentatively scheduled that the North Albany TSD facility will no longer store PCB oil, PCB solids, capacitors or mercury wastes after March 31, 2008.

Milestone #3

Decontamination of the storage facility is tentatively scheduled for completion by June 20, 2008, at an approximate cost of $76,812. (The estimate of cost was prepared by Disposal Contractor.)

For an estimate of the maximum inventory of wastes in storage at any given time during the life of the facility, see attachment No. 1 - Inventory of Wastes in Storage.

The closure plan will be amended when operating or design changes affect the plan.

The closure plan will be submitted to the NYSDEC at least 180 days prior to the expected commencement of closure.

A "Certification of Closure" by a registered professional engineer independent of the 373 permitted facility will be submitted to the NYSDEC after completion of closure.

For an estimate of the cost of closing the storage facility, see Attachment No. 2 - Facility Closure cost estimate (prepared by disposal contractor). The closure cost estimate was produced by a qualified consultant taking into account the following specific requirements for proper closure:

1. Decontamination costs (labor, solvent, containers, i.e.).

2. Decontamination waste sampling and analysis costs;

3. Hauling costs; and

4. Disposal cost.

Attachment No. 1

Inventory of Wastes in Storage

PCB Oil

Storage Tanks

3 - 5000
15,000 gallons at any given time (max.)

liquid, solids, mercury and capacitors
120-55 drums or wooden crates or 40
approved D.O.T. Shipping Containers and/or
5 large transformers at any given time
(max.).

15 distribution transformers[1]

[1]Distribution transformers in place of a drum.

Attachment No. 2

Facility Schedule for Milestone And

Final Closure Cost Estimate

FINAL CLOSURE

It is estimated that the North Albany TSD facility would no longer store PCB oil, PCB solids, capacitors or mercury wastes after 25 years (2007).

The approximate cost to decontaminate the facility equipment is $76,812 (Prepared by Disposal Contractor).

New York State Department of Environmental Conservation
50 Wolf Road, Albany, New York 12233-

Henry G. Williams
Commissioner

JUL 7, 1986

Mr. Brian Ross
Niagara Mohawk Power Corporation
1125 Broadway
Albany, New York 12201

RE: Hazardous Waste Compliance Inspection Date: June 4, 1986
Location of Handler: Same as Above

EPA Identification Number: NYD000730408

Dear Mr. Ross:

In order to determine compliance with the New York State Hazardous Waste Regulations, the New York State Department of Environmental Conservation conducted an inspection of your facility on the above referenced date.

As a result of that inspection, review of documentation submitted by your facility to this Department, and applying the New York State Hazardous Waste Regulations, we believe that your facility is operating as a generator and a treater, storer and/or disposer of hazardous waste.

Your facility was in compliance with the New York State Hazardous Waste Regulations on the inspection date referenced above. A copy of the Inspection Form is enclosed for your records.

Thank you for your cooperation.

Sincerely,

David A. Mafrici

David Mafrici, P.E.
Chief
Bureau of Hazardous Waste Operations
Division of Solid and Hazardous Waste

Enclosure

cc: w/o enc. - Mr. Charles Sarris, Regional Attorney
Mr. Irving L. Bonsel, Regional Solid and Hazardous Waste
Mr. Gary A. Johnston, Inspector
New York State Department of Environmental Conservation - Region 4

Mr. Bruce W. Knapp, Reviewer
New York State Department of Environmental Conservation - Albany

47-15-14(12/85)

REGION: ~~IV~~
Major: X
Non-Major:

NEW YORK STATE INDUSTRIAL HAZARDOUS WASTE MANAGEMENT ACT

(Chapter 639, Laws of 1978)

Prepared for:

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
Henry G. Williams, Commissioner

Division of Solid and Hazardous Waste
Norman H. Nosenchuck, Director

Send to: Compliance Inspection Section
50 Wolf Road - Room 207/415
Albany, New York 12233-0001

EPA I.D. NUMBER: NYD000730408

*HANDLER'S NAME (Corporate): Niagara Mohawk Power Corp
(Division):

*HANDLER'S MAILING ADDRESS: 1125 Broadway

City & State Albany, NY Zip Code 12204

*HANDLER'S LOCATION ADDRESS:
(if different than mailing)

City & State _____, _____ Zip Code _____

*HANDLER'S TELEPHONE NUMBER: (518) 471 3304 Extension _____

*FULL NAME OF HANDLER'S CONTACT: (Mr.) ~~(Ms.)~~ Brian Ross

*SIGNATURE OF HANDLER'S CONTACT: _____

(This signature is not an admittance to any violations cited herein. It merely acknowledges that an inspection took place.)

*TITLE OF HANDLER'S CONTACT: _____

INSPECTION DATE: 06/04/86 TIME OF INSPECTION: 10:00 (a.m) p.m.
COUNTY: Albany E/A NUMBER: _ _ _ _ _ _

INSPECTOR'S NAME: Gary A. Johnston
TITLE: Senior Engr.
NAME:
TITLE:

CHECK ONE: Copy of THIS report (__ has) (X has not) been given to the Handler.

REPORT PREPARED BY: Gary A. Johnston DATE: 06/20/86
REPORT APPROVED BY: Danny L. Crissel DATE: 6/24/86

New York State Department of Environmental Conservation
Division of Solid and Hazardous Waste
50 Wolf Road, Albany, New York 12233

PART I

General Information and Classification of Facility

1. Identification of Hazardous Waste - 371 — Yes: ___ No: ___

A. Is there reason to believe the facility has hazardous waste on-site? If yes, what leads you to believe it is hazardous waste? Check appropriate box/boxes and attach any applicable correspondence with DEC or EPA: — Yes: X No: ___

(1) X Company recognizes that its waste is hazardous during the inspection.

(2) X Company admitted the waste is hazardous in its RCRA notification and/or Part A permit application.

(3) X EPA testing has shown characteristics of:
( ) ignitability - 371.3(b);
( ) corrosivity - 371.3(c);
( ) reactivity - 371.3(d);
(X) EP toxicity - 371.3(e)

___ Has revealed hazardous constituents (please attach analysis report) 371.4(a)(2), Appendix 22, Appendix 23

(4) ___ The material is listed in the regulations as a hazardous waste from non-specific sources 371.4(b).

(5) ___ The waste material is listed in the regulations as a hazardous waste from specific sources. 371.3(c).

(6) ___ The material or product is listed in the regulations as discarded commercial chemical products, off-specification species, container residues and spill residues thereof. 371.4(d).

(7) ___ Company is unsure, but they have reason to believe that waste materials are hazardous. (Explain) _____

_____

(8) X ~~If don't know~~, please explain: _____
PCB wastes
_____
_____

B. Is there reason, other than those above, for you to believe that there is hazardous waste on site? (Explain) _____

_____

_____

C. What other environmental permits are held by the company, relative to hazardous waste management?

____ SPDES Permit Number ____ Air Permit Number

____ Part 364 Industrial Waste Transporter Permit (indicate this company's permit number if any)

Please describe other relavent (if any) permits and give the name, address, Part 364 Permit Number and EPA I.D. Number of transporter(s) used by company.

_____

_____

_____

D. If the facility is a treatment, storage or disposal facility, have they:

X Submitted a Part A application. ____ Have changes been made that are not reflected in the Part A application? Should the Part A be modified by the Company? ____ If so, explain.

_____

_____

_____

_____

_____

____ Submitted a Part B application.

____ Been granted a Part 373 permit.

If so, when does it expire: _____
Please attach or explain any special conditions or variances - 373-1.1(e) _____

_____

_____

_____

____ Been granted a hazardous waste Part B permit.

If so, also complete the facility Part B (Part 373) permitted inspection report - Appendix K.

E. Describe the activities that result in the generation of hazardous waste. Include the company's manufacturing processes. _____

- transformer maintenance
- gas regulators
- mercury vapor lites

F. Identify the hazardous wastes that are on-site and the quantity of each (use the identification numbers referred to in Part 371). _____

50-55 gal drms	waste mercury	D009
55-55 gal drms	PCB liq 500+	B003
40-55 gal drms	PCB solids	B007
6-~~55~~ gal drms	PCB capacitors	B004
1400 gals	PCB oil 50-500	B002

G. The handler notified EPA as a:

generator - TSD

Has EPA or DEC officially modified the handlers status? If so, attach correspondence. _____

_____

2. Status Identification:

This handler should be inspected as a (check each appropriate category after considering exemptions)

A. ____ Transporter - complete Appendix B

B. Generator Status Identification 372.1

1. ____ Category 1 generator - small quantity generator - generates less than 100 kg/mo and stores less than 100 kg. - 372.1(e)(1)i - Complete Part II, 1A.

2. ____ Category 2 generator - small quantity generator - generates less than 100 kg/mo and stores more than 100 kg but less than 1,000 kg. - 372.1(e)(1)ii - Complete Part II, 1B.

3. ____ Category 3 generator - small quantity generator - generates more than 100 kg/mo but less than 1,000 kg/mo and stores less than 1,000 kg. - 372.1(e)(1)iii - Complete Part II, 1B and 1C.

4. ____ Category 4 generator - small quantity generator containing less than - (372.1(e)(1)(iv)) - Complete Part II, 1A.

(a) ____ A total of one kilogram of all commercial product or manufacturing chemical intermediate having the generic name listed in paragraph 371.4(d)5.

(b) ____ A total of one kilogram of any off-specification commercial chemical product or manufacturing chemical intermediate which, if it met specifications, would have the generic name listed in paragraph 371.4(d)5.

(c) ____ Any containers identified in paragraph 371.4(d)(3) of this title that are larger than 20 liters in capacity.

(d) ____ A total of 10 kilograms of inner liner from containers identified in paragraph 371.4(d)(3) of this title.

(e) ____ One hundred (100) kilograms of any residue or contaminated soil, water or other debris resulting from the cleanup of a spill, into or on any land or water, of any commercial chemical product, off-specification product, or manufacturing chemical intermediate having the generic name listed in paragraph 371.4(d)5 of this title.

5. X Category 5 generator - generated 1,000 kilograms or more per month - Complete Part II. Generators in Kings, Queens, Nassau and Suffolk Counties also complete Appendix A.

6. X Category 6 generator - stores 1,000 kilograms or more - Complete Part II. Generators in Kings, Queens, Nassau and Suffolk Counties also complete Appendix A.

C. Treatment, Storage or Disposal Facility Status

1. Is hazardous waste generated and stored on-site? If so:

(a) X Has hazardous waste been stored on-site longer than 90 days? 373-1.1(d)(1)(iii) - If yes, complete Appendix A.

(b) ____ Has more than 8,800 gallons of hazardous waste been stored in containers? 373-1.1(d)(ii)(a) - If yes, complete Appendix A.

(c) ____ Has more than 20,000 gallons of hazardous waste been stored in tanks? 373-1.1(d)(iii)(b) - If yes, complete Appendix A.

2. X Hazardous waste received from off-site and not beneficially used, reused or legitimately recycled or stored. If yes, complete Appendix A.

3. ____ Hazardous waste is treated on-site.

4. ____ Hazardous waste is disposed of on-site.

3. Exemptions

If the handler is inspected other than as they notified (e.g., notified as generator/TSD - inspected as exempt generator) a full explaination should be included in Part III.

A. Generator Exemptions

(1) ____ Not a regulated handler (be sure to indicate why in Part I 1F and 1G and/or in appropriate exemption below - for example the company notified for precautionary reasons or the waste generated is not hazardous as specified in 371.1(e)(2).

(2) ____ Delisted hazardous waste. IDENTIFY the waste that was delisted: (If the company is in the delisting process they are still regulated until their delisting petition is favorably approved) Complete appropriate parts depending on company status.

_____

_____

_____

(3) ____ Exemption for used engine lubricating oil. 372.1(e)(8) -

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

8. The generator complies with the following special requirements related to incompatible wastes: 373-3.9(g)

(a) The storage of ignitable or reactive wastes, and the mixture or comingling of incompatible wastes, or incompatible wastes and materials, is conducted to prevent - 373-3.2(h)(2)

(1) ____ the generation of extreme heat or pressure, fire or explosion, or violent reaction - 373-3.2(h)(2)(i) X

(2) ____ production of uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to threaten human health - 373-3.2(h)(2)(ii) X

(3) ____ production of uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions - 373-3.2(h)(2)(iii) X

(4) ____ the damage to the structural integrity of the device or facility containing the waste - 373-3.2(h)(2)(iv) X

(5) ____ a threat to human health or the environment - 373-3.2(h)(2)(v) X

(b) ___ Hazardous waste must not be placed in an unwashed container that previously held an incompatible waste or material. 373-3.9(g)(2) X

(c) ___ Hazardous waste in containers stored nearby incompatible waste or material is separated by the incompatible waste by a dike, berm, wall or other device. 373-3.9(g)(3). X

D. Standards for management of tanks - 372.2(a)(8)(ii); 373-3.10

1. What are the approximate number and size of tanks containing hazardous waste?

1 - 3000 gal Tank

2. Identify the waste treated/stored in each tank. Include whether they are above or below ground.

above ground 1400 gals PCB oil
50-500 ppm

New York State Department of Environmental Conservation
Division of Solid and Hazardous Waste
Bureau of Hazardous Waste Operations
50 Wolf Road, Albany, New York 12233

Handler Name Niagara Mohawk
EPA ID No. NYD000730408

Appendix A

Treatment, Storage and Disposal Inspection Section
Also complete for generators in Kings, Queens, Nassau and Suffolk Counties

Indicate:	Indicate:
X Violations	X Satisfactory NA Not Applicable

1. Owner Transfer

(A) ___ The facility has transferred ownership or operation of facility with prior written approval of the Department - 373-2.2(b)(1). ___

(B) ___ Before transferring ownership or operation of a facility during its operating life, or of a disposal facility during the post-closure care period, the owner or operator notified the new owner or operator in writing of the requirements - 373-3.2(c)(2). NA

2. Sampling

(A) ___ The owner or operator obtained a sample of the waste and had it analyzed - 373-3.2(d)(1)(i); or X

(B) ___ The analysis included data developed under 6NYCRR Part 371, and existing published or documented data on the hazardous waste or on waste generated from similar processes - 373-3.2(d)(1)(ii) X

(C) ___ The analysis has been repeated as necessary to ensure that it is accurate and up to date - 373-3.2(d)(I)(iii) X

3. Waste Analysis Plan -

(A) ___ The owner or operator has developed and followed a written waste analysis plan - 373-3.2(d)(2) X

(B) ___ The owner or operator keeps this plan at the facility - 373-3.2(d)(2) X

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

(C) The plan specifies at a minimum:

(1) ___ The parameters for which each hazardous waste will be analyzed and the rationale for the selection of these parameters - 373-3.2(d)(2)(i) — X

(2) ___ The test methods which will be used to test for these parameters - 373-3.2(d)(2)(ii) — X

(3) ___ The sampling method which will be used to obtain a representative sample of the waste to be analyzed - 373-3.2(d)(2)(iii) — X

(4) ___ The frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up to date - 373-3.2(d)(2)(iv) — X

(5) ___ For off-site facilities, the waste analyses that hazardous waste generators have agreed to supply - 373-3.2(d)(2)(v) — ___

(7) (For off-site facilities) The waste analysis plan required must also specify the procedures which will be used to inspect and, if necessary, analyze each movement of hazardous waste received at the facility to ensure that it matches the identity of the waste designated on the accompanying manifest or shipping paper. The plan describes, at a minimum:

(a) ___ The procedure which will be used to determine the identity of each movement of waste managed at the facility - 373-3.2(d)(3)(i); and — X

(b) ___ The sampling method which will be used to obtain a representative sample of the waste to be identified, if the identification method includes sampling - 373-3.2(d)(3)(ii) — X

4. Security - 373-3.2(e)

(A) The owner or operator has adequately prevented the unknowing entry, or minimized the possibility for the unauthorized entry, of persons or livestock onto the active portion of his facility, because:

(1) Physical contact with the waste, structures or equipment, or with the active portion of the facility may injure unknowing or unauthorized persons or livestock which may enter the active portion of a facility - 373-3.2(e)(1)(i) — YES OR NO: yes

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

(2) Disturbance of the waste or equipment, by the unknowing or unauthorized entry of persons or livestock onto the active portion of a facility, may cause a violation of the requirements - 373-3.2(e)(1)(ii) — YES OR NO: yes

(B) If not exempt under A1 or A2 above, the facility must have the following:

(1) ___ A 24-hour surveillance system which continuously monitors and controls entry onto the active portion of the facility - 373-3.2(e)(2)(i) or — X

(2) ___ An artificial or natural barrier which completely surrounds the active portion of the facility - 373-3.2(e)(2)(ii)(a) and — X

___ A means to control entry, at all times, through the gates or other entrances to the active portion of the facility - 373-3.2(e)(2)(ii)(b) — X

(3) ___ A sign with the legend, "Danger - Unauthorized Personnel Keep Out" posted at each entrance to the active portion of a facility, and at other locations, in sufficient numbers to be seen from any approach to that active portion - 373-3.2(e)(3). — X

5. General Inspection Requirements - 373-3.2(f)

(A) ___ The owner or operator has inspected the facility for malfunctions and deterioration, operator errors, and discharges which may be causing - or may lead to release of hazardous waste constituents to the environment, or a threat to human health - 373-3.2(f)(1) — X

(B) (1) ___ The owner or operator has developed a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment that are important to preventing, detecting or responding to environmental or human health hazards - 373-3.2(f)(2)(i) — X

(2) ___ He has kept the written inspection schedules at the facility - 373-3.2(f)(2)(ii) — X

(3) ___ The schedule identifies the types of problems which are to be looked for during the inspection - 373-3.2(f)(2)(iii) — X

Indicate:

X Violations

Indicate:

X Satisfactory
NA Not Applicable

(4) ___ The frequency of inspection is based on the rate of possible deterioration of the equipment and the probability of an environmental or human health incident, if the deterioration or malfunction or any operator error goes undetected between inspections - 373-3.2(f)(2)(iv) ___

(C) ___ The owner or operator has remediated deterioration or malfunction of equipment or structures which the inspection has revealed - 373-3.2(f)(3) ___

(D) ___ The owner or operator has recorded inspections in an inspection log or summary - 373-3.2(f)(4) X

(E) ___ The inspection log or summary has been kept for at least three years from the date of inspection - 373-3.2(f)(4) X

(F) ___ The records, at a minimum, include the date and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial actions - 373-3.2(f)(4) X

6. Ignitable or reactive wastes - Complete Part II 3 C 7 and 3 D 9-11.

7. Personnel Training - Complete Part II 5.

8. Preparedness and Prevention - Complete Part II 6

9. Contingency Plan and Emergency Procedures - Complete Part II 7

10. Manifest system, recordkeeping and reporting -

The regulations in this paragraph apply to the owners and operators of all hazardous waste facilities.

A. Operating Record - 373-3.5(c)

(1) ___ There is an operating record. ___

SEP 16 1983

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John Loomiss
Niagara Mohawk
300 Erie Boulevard West
Syracuse, NY 13202

Re: EPA Identification Number: NYD980730403
Facility Location: North Albany Service Center
1125 Broadway, Albany, NY 12201
Inspection Date: May 3, 1983

Dear Mr. Loomiss:

The Environmental Protection Agency (EPA) is charged with the responsibility of implementing the Solid Waste Disposal Act, as amended, 42 U.S.C. §6901 et seq. (the Act). [Among the statutes amending the Act is the Resource Conservation and Recovery Act (RCRA), 90 Stat. 2795, P.L. 94-580 (1976).] By notification, you informed EPA that you conduct activities at the above referenced facility involving "hazardous waste," as that term is defined in section 1004(5) of the Act, 42 U.S.C. §6904(5), and in 40 CFR §261.

In accordance with EPA's responsibility, an inspection was performed at this facility by a duly authorized representative of EPA pursuant to Section 3007 of the Act. This above referenced inspection revealed that your facility was acting as a generator by producing hazardous waste.

40 CFR Part 262.34 establishes standards for generators who accumulate hazardous waste on site for 90 days or less. This section of Part 262 incorporates by reference §265.16 and Subparts C, D, I, and J of 40 CFR Part 265.

The inspection revealed that your facility was in violation of one or more of these subparts. On the basis of these findings, the Chief, Solid Waste Branch, Region II, has determined that your facility is operating in violation of Section 3002 of the Act, 42 U.S.C. §6922, and the regulations promulgated thereunder. The following paragraphs indicate the regulatory provisions that have been violated.

¶ 40 CFR §262.34(a) allows a generator to accumulate hazardous waste in containers and tanks for a period of no more than 90 days provided the accumulation conforms to certain regulations. At the time of the inspection, it was revealed that your facility did not meet the requirements of:

- 40 CFR §262.34(a)(2) which requires the date upon which each period of accumulation begins to be clearly marked and visible for inspection on each container. You were therefore in violation of 40 CFR §262.34(a)(2).

§ 40 CFR §262.34(b) states that a generator who accumulates hazardous waste for more than 90 days is an operator of a storage facility and is subject to the requirements of 40 CFR Parts 264 and 265, and the permit requirements of 40 CFR Part 270. At the time of the inspection, waste had been accumulated on-site for more than 90 days without total compliance with all the regulations governing operators of storage facilities. This was observed to violate 40 CFR §262.34(b)

Section 3008 of the Act authorizes the assessment of a civil penalty of up to $25,000 per day for violations of statutory provisions or regulations. The determination of whether a penalty is to be imposed in each case and the amount and seriousness of the violation and the good faith efforts to comply with the applicable requirements. It has been determined in this case that no penalty will be imposed for the violations cited above if the facility corrects all violations cited herein as expeditiously as possible and in no case later than thirty (30) days from the receipt of this letter. Should the cited violations be discovered at this facility during future inspections, it is likely that an action for the assessment of a civil penalty will be initiated. Furthermore, please be advised that this letter in no way precludes future enforcement actions for any other violations discovered as a result of any other inspection.

Please confirm in writing within thirty (30) days of your receipt of this letter that the above referenced violations have been corrected and include any written documentation as appropriate. This confirmation should be addressed to:

Ernest A. Najna
Chief, Solid Waste Branch
Air and Waste Management Division
U. S. Environmental Protection Agency, Region II
26 Federal Plaza
New York, NY 10278

with copies to:

Richard A. Baker
Chief, Permits Administration Branch
U. S. Environmental Protection Agency, Region II
26 Federal Plaza
New York, NY 10278

and

Irving Mensch
Regional Solid Waste Engineer, Region 4
New York State Department of Environmental Conservation
2176 Guilderland Avenue
Schenectady, NY 12306

You must include your EPA identification number on all correspondence.

Should you have questions about this Notice or should you wish to discuss this matter further, please contact Janet Pelosio of my staff at (212) 264-1890. A copy of the inspection report is enclosed.

Sincerely yours,

Ernest A. Regna
Chief
Solid Waste Branch

Enclosure

cc: David Gutrick, Chief,
Bureau of Hazardous Waste Operations, NYSDEC, w/o encl.

Irving Bonsel ✓
Regional Solid Waste Engineer, Region 4, NYSDEC, w/o encl.

Facility Name Niagara Mohawk

EPA I.D. No. NYD 000730408

Date Of Inspection 5/3/83

NOT FOR RELEASE TO COMPANY, PROTECTED INFROMATION

Summary, Conclusions and Recommendations

Facility had problems initially. Enforcement action completed by USEPA in November 1982 fined company $18000 and needs to show substantial compliance since the date. Also, person in charge changed at this time.