

Attached to  
7/11/89 memo

Waite Road Site #546023  
Proposed Remedial Action Plan

This document presents the proposed remedial action plan for the Waite Road Site, #546023, located on Waite Road in the Town of Clifton Park, Saratoga County.

Site Location and Description

The Waite Road site is located at the southwestern corner of the intersection of Waite Road and the Boston and Maine rail line in the Town of Clifton Park, Saratoga County. The site encompasses approximately five acres, including a small pond and wetland area. The site is in a suburban to rural area, with approximately a dozen residences within one-half mile of the site. Lands immediately adjacent to the site, with the exception of the Boston and Maine rail line, are undeveloped and mostly forested.

Site History

The Waite Road site was operated as a waste oil recovery and storage area by Albany Waste Oil Co., a waste oil transporter. The site received waste oil from a large number of generators, including the General Electric Company and Niagara Mohawk Power Corp. Releases of waste oil to the environment at the site prompted a removal action in 1981, which was performed under the NYSDOT oil spill cleanup program in effect at the time.

The 1981 removal action consisted of the removal and subsequent disposal of large volumes of liquid waste oil and contaminated soil, including a large waste oil spill at the site.

After the removal action in 1981, unidentified "midnight dumpers" illegally disposed of liquid hazardous wastes into several large tanks which remained at the Waite Road site. Subsequent investigations by the NYSDEC resulted in the performance of a second removal action by the NYSDEC in 1987.

The 1987 removal action, funded by the New York State "Superfund", consisted of the removal and proper disposal of several thousand gallons of liquid wastes and contaminated water from the tanks at the site. The tanks were then decontaminated, dismantled, and scrapped.

## Current Status

The current status of the site is known from data gathered during the past removal actions and the recently completed Remedial Investigation/Feasibility Study (RI/FS).

A group of potentially responsible parties (PRPs) entered into a consent order with the State of New York to determine the nature and extent of any residual contamination at the site (Remedial Investigation) and evaluate the feasibility of remedial options (Feasibility Study) to address any residual contamination problems.

Results of the Remedial Investigation are as follows:

- 1) Areas of soil contamination with petroleum hydrocarbons and polychlorinated biphenyls (PCBs) were identified and delineated.

The highest concentration of PCBs detected by the laboratory on-site is 35 ppm, which is below the 50 ppm cutoff for disposal of solid materials as a PCB waste. Elsewhere on-site, only twelve samples contained detectable concentrations of PCBs, with values ranging from 0.027 to 9.7 ppm. The balance of on-site samples analyzed by the laboratory did not contain detectable concentrations of PCBs.

Of the total 19 off-site samples analyzed by the laboratory, 14 did not contain detectable concentrations of PCBs. Where detected in off-site soils, PCB concentrations ranged from 0.022 ppm to 1.5 ppm. Only two of these samples contained greater than 1 ppm of PCBs.

- 2) Groundwater sampling showed contamination with some petroleum hydrocarbons, two wells showed very limited contamination with Benzene and Dichloroethane.
- 3) Several poorly constructed monitoring wells which may contribute to future groundwater contamination exist at the site from past activities.
- 4) Levels of barium which narrowly exceed New York State drinking water standards were found in two residential wells near the site. It is not known if the presence of barium is related to site activities or is naturally occurring.

## Enforcement Status

The lead enforcement agency for the Waite Road site is the New York State Department of Law (NYS DOL).

The Waite Road case was first filed in December of 1983 against H. Eugene Wray, the owner/operator of the site, and Niagara Mohawk Power Corporation. In 1984, the General Electric Co. was added as a defendant. During the pendency of the action, Wray's company went defunct and he was driven into personal bankruptcy. In 1985, General Electric and Niagara Mohawk added several other defendants in a third-party lawsuit, adding some 100 local gas stations and auto dealerships who had had Wray pick up waste oil.

Over 200 pleadings and more than 20 depositions have been filed and taken during the course of the litigation. Motion practice has been extensive.

In 1988 the United States District Court stayed third and fourth party practice and ordered a settlement moratorium period to encourage the parties to resolve the case prior to trial. A Consent judgment has been submitted to the Court under which, inter alia, the defendants will implement the proposed remedial action.

#### Summary of Evaluation of Alternatives

Four remedial alternatives were evaluated in the feasibility study portion of this investigation. The four alternatives were:

- 1) No action, with long-term monitoring
- 2) Encapsulation, with long-term monitoring
- 3) Pumping and treatment of contaminated groundwater
- 4) Source removal and control with post remedial monitoring.

The no action alternative was not considered feasible because of the long-term monitoring and stewardship of the site that would be required, and the potential for future releases from the site would be unabated.

Encapsulation was not considered feasible due to the presence of wetlands at the site that would be lost due to construction associated with this remedy. On-site encapsulation of waste without treatment is also given a low preference.

Pumping and treatment of contaminated groundwater is not considered feasible for this site due to the low conductivity of the aquifer, the unpredictable nature of fractured bedrock aquifers, and the very low concentrations of contaminants in groundwater at the site.

Source removal and control, with post-remedial monitoring, has been selected as the preferred remedial option. Under this option, residual contaminant sources will be removed from the site, impact on the wetlands on and adjacent to the site will be minimized, direct contact hazards associated with petroleum contaminated soils will be minimized, and surface runoff and erosion of residual petroleum hydrocarbons will be controlled.

## Details of Proposed Remedial Action

The goals of the remediation for the Waite Road site are:

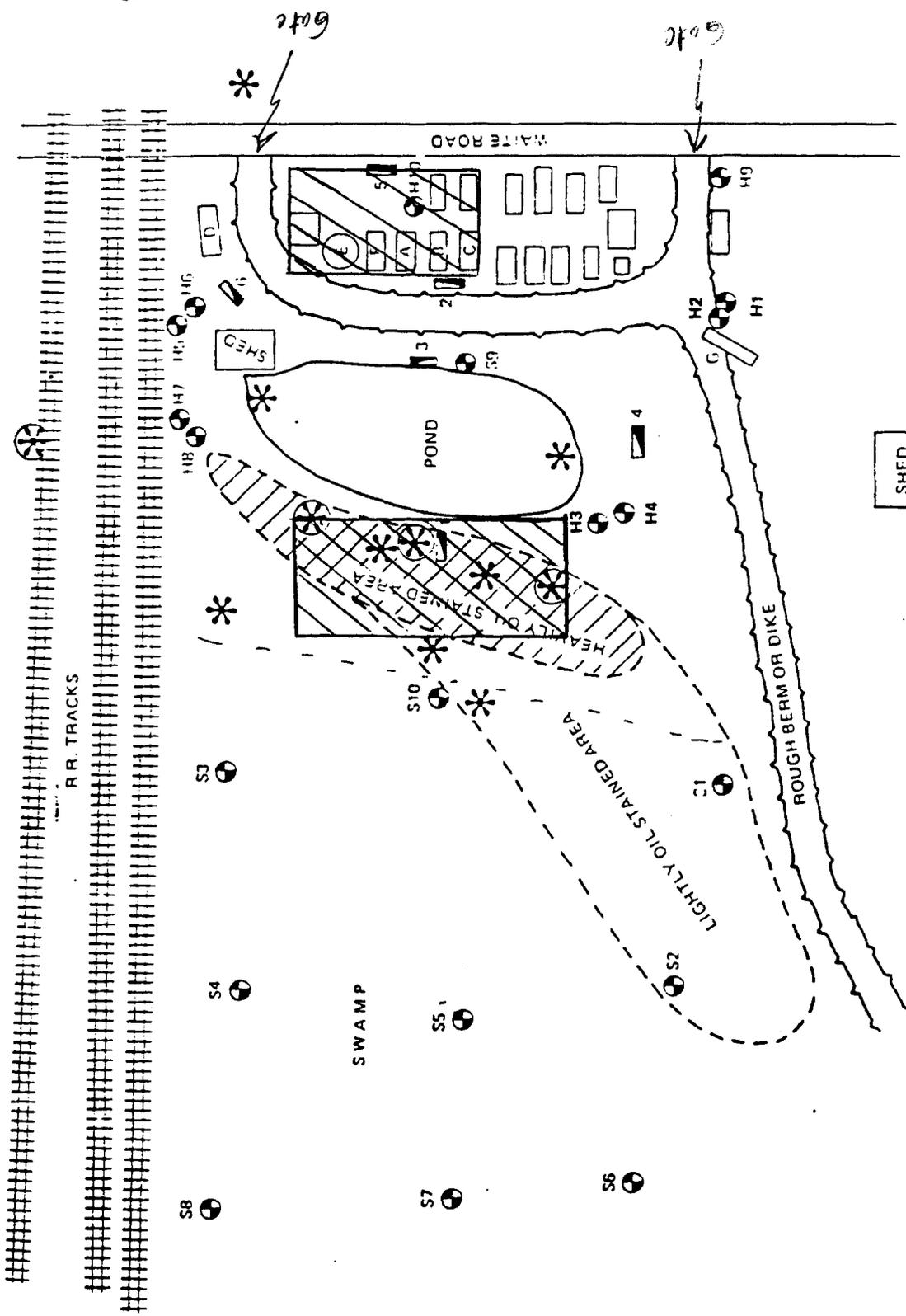
- 1) removing residual sources of contamination
- 2) decommissioning and grouting of poorly constructed on-site wells to minimize the potential for groundwater contamination
- 3) controlling surface runoff and erosion to prevent migration of petroleum-contaminated soils
- 4) minimize impact on adjacent wetlands
- 5) minimize direct contact with petroleum contaminated soils.

These goals will be achieved by implementing the following remedial program:

- Soils containing greater than one percent petroleum hydrocarbons will be removed from the site. Soils in the vicinity of the former tank area (eastern portion of site) and the spill area (west-central portion of site) will be removed to a depth of approximately one foot below grade. As a result of this soil removal, soils containing elevated levels of PCB will also be removed, although this material would not be considered a PCB waste due to the low concentration present. Approximately 650 cubic yards of soil will be removed.
- The site will be regraded to control future surface water runoff and erosion.
- A one-foot thick layer of clean soil will be placed over the site to isolate residual petroleum-contaminated soils, and the site will be revegetated.
- Existing poorly constructed monitoring wells will be decommissioned by reaming and grouting to eliminate the vertical migration pathway these wells currently represent.
- Six new monitoring wells will be installed at the site to provide additional post-remedial monitoring points.
- A contingency plan will be developed to contend with potential problems that may arise during and after remediation.
- A post-remedial groundwater monitoring plan will be implemented to demonstrate that groundwater is not being impacted. This monitoring will utilize a total of nine monitoring wells, and will include semi-annual groundwater analysis for Target Compound List volatile organic compounds in conjunction with a library search for non-targeted compounds to identify and quantify potentially mobile petroleum hydrocarbons. Tests for total petroleum hydrocarbons and barium will also be performed.

Post Remedial Monitoring

The schedule for post-remedial monitoring calls for semi-annual monitoring for five years. After five years, the Department will determine if further monitoring is to be required.



**LEGEND**

- ABOVE GROUND TANKS (LABELED BY NYSDEC)
- TEST PIT
- MONITORING WELL
- SOIL SAMPLE (11/82)
- SOIL AND SEDIMENT SAMPLE (9/84)
- Approximate area to be remediated. (Soils)
- BASE MAP PROVIDED BY NYSDEC

**WAITE ROAD SITE SKETCH**

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