



1090 KING GEORGES POST ROAD
SUITE 1103
EDISON, NEW JERSEY 08837
201 225 6160

4850
AMF
Lewis Co.

C-584-04-91-53

April 30, 1991

Ms. Amy Brochu
U.S. Environmental Protection Agency
Region 2
Edison, New Jersey 08837

Re: Letter Report, AMF Lowville Operations, Lowville, St. Lawrence County, NY, EPA I.D. No. NYD990762148

Dear Ms. Brochu:

After review of available information for the Environmental Priorities Initiative Preliminary Assessment (PA), regarding the AMF Lowville Operations Site, a recommendation of **NO FURTHER REMEDIAL ACTION PLANNED (NFRAP)** is proposed. AMF Lowville Operations (AMF) is located at Utica Boulevard in Lowville, New York. This preliminary assessment is authorized under TDD No. 02-9104-05. The basis for this recommendation is presented in the information as follows:

- November 7, 1980 - The U.S. Environmental Protection Agency (EPA) issued an Acknowledgement of Notification of Hazardous Waste Activity, EPA Form 8700-12B, under EPA I.D. No. NYD990762148 to AMF Lowville Operations. It is assumed that this was issued in response to the filing of a Notification of Hazardous Waste Activity by AMF. The application was not present in the site files; it is unknown whether AMF filed its notification as a generator, transporter, or a treatment storage and/or disposal facility (TSDF).
- March 30, 1983 - AMF documented that they had the financial capability to execute a closure operation in conformance with Subpart H of 40 CFR parts 264 and 265. It is assumed that AMF considered itself a TSDF and submitted this documentation in support of closure requirements.
- October 18, 1984 - Gerald M. Levy, Chief, Compliance Monitoring Enforcement, U.S. EPA Region I, informed Ernie Regna, Chief, Solid Waste Branch U.S. EPA Region II, that EPA had taken enforcement action against other AMF facilities in Region I, "for their failure to submit adequate financial documentation (both insurance and assurance)". He added that AMF had a facility in Region II and recommended it for further investigation.
- June 7, 1985 - John Middelkoop, P.E., Supervisor Permits Section, New York State Department of Environmental Protection (NYSDEC), responded to an apparent request for reclassification by AMF to generator only status with an approval of the closure plan for the Lowville, NY facility.



Ms. Amy Brochu
U.S. Environmental Protection Agency
April 30, 1991 - Page Two

- June 25, 1985 - Paul R. Guevin, Senior Chemist, AMF, requested that EPA Region 2 deny AMF's Part B RCRA permit, terminating the Lowville, New York facility's TSDF interim status.
- Recent telephone conversations between NYSDEC Region 6 and NUS personnel confirmed that there has been no permitting activity since 1985, and that NUS files regarding this site were current and complete. NYSDEC has also advised NUS Region 2 FIT that, based on all of their information, AMF is considered an erroneous filer and will be administratively treated as such.

The above information, supported by the attached references, indicates that although AMF's Hazardous Waste Permit Application has not been recorded, it was presumably filed erroneously by AMF for the Lowville, New York facility. Insurance documentation submitted by AMF indicates that the company presumed TSDF status for this facility, but there is no documentation available that supports that AMF operated as a TSDF. Accordingly, the NYSDEC designated AMF as an erroneous filer and changed the RCRA permit status for the AMF Lowville Operations installation from a TSDF to generator only. These findings support a finding of NFRAP for AMF.

If you have any questions, please do not hesitate to contact me.

Very truly yours,



John F. Copman

Reviewed and Approved:



JFC/imv

Attachments

REFERENCES

1. U.S. Environmental Protection Agency (EPA) Acknowledgment of Notification of Hazardous Waste Activity (Verification), AMF Inc., EPA I.D. NYD990762148, November 7, 1980.
2. Letter from J. Edward Sheridan, Vice President Finance and Treasurer, AMF Incorporated, to Regional Administrator, U.S. EPA Region II. March 30, 1983.
3. Letter from Gerald M. Levy, U.S. EPA Region I, to Ernie Regna, Chief, U.S. EPA Region II. October 18, 1984.
4. Letter from John Middelkoop, NYSDEC, to Paul R. Guevin, AMF, Incorporated. June 7, 1985.
5. Letter from Paul Guevin, AMF, to Richard Baker, U.S. EPA Region II, June 25, 1985.
6. Telecon Note: Conversation between Thomas Morgan, NYSDEC Region 6, and John F. Copman, NUS Corp., April 4, 1991.
7. U.S. EPA / NY CERCLIS List-8, Site/Event Listing, March 6, 1991.
8. U.S. EPA / NY CERCLIS List-4, Site Alias Location Listing, March 6, 1991.

REFERENCE NO. 1



**ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)**

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

•NYD990762148

INSTALLATION ADDRESS

AMP INC
UTICA BLVD
LOWVILLE

NY 13367

UTICA BLVD
LOWVILLE

NY 13367

REFERENCE NO. 2



AMF INCORPORATED
World Headquarters, 777 Westchester Avenue
White Plains, New York 10604 • 914/694-9000

March 30, 1983

Regional Administrator
Region II
U.S. Environmental Protection Agency
26 Federal Plaza
New York, New York 10278

Dear Sir:

I am the chief financial officer of AMF Incorporated, 777 Westchester Avenue, White Plains, New York 10604. This letter is in support of this firm's use of the financial test to demonstrate financial assurance, as specified in Subpart H of 40 CFR Parts 264 and 265.

1. This firm is the owner or operator of the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure estimates covered by the test are shown for each facility: Lowville Operations, South State Street, Lowville, New York 13367; EPA ID #NYD 990762148 - \$3,200.

2. This firm guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure or post-closure care of the following facilities owned or operated by subsidiaries of this firm. The current cost estimate for the closure or post-closure care so guaranteed are shown for each facility: None.

3. In States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 164 and 165, this firm, as owner or operator or guarantor, is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 164 and 165. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility: None.

4. This firm is the owner or operator of the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 164 and 165 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: None.

This firm is required to file a Form 10K with the Securities and Exchange Commission ("SEC") for the latest fiscal year.

The fiscal year of this firm ends on December 31. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1982.

This firm meets both alternative financial tests to demonstrate financial assurance.

Alternative I

1.	Sum of current closure and post-closure cost estimates (total of all cost estimates shown in the four paragraphs above)	\$ 3,200
*2.	Total liabilities (if any portion of the closure or post-closure cost estimates is included in total liabilities, you may deduct the amount of that portion from this line and add that amount to lines 3 and 4)	\$465,578,000
*3.	Tangible net worth	\$383,524,000
*4.	Net worth	\$424,491,000
*5.	Current assets	\$435,342,000
*6.	Current liabilities	\$255,811,000
7.	Net working capital (line 5 minus line 6)	\$179,531,000
*8.	The sum of net income plus depreciation, depletion, and amortization	\$ 66,614,000
*9.	Total assets in U.S. (required only if less than 90% of firm's assets are located in the U.S.)	\$615,524,000

	Yes	No
10. Is line 3 at least \$10 million?	X	_____
11. Is line 3 at least 6 times line 1?	X	_____
12. Is line 7 at least 6 times line 1?	X	_____
*13. Are at least 90% of firm's assets located in the U.S.? If not, complete line 14.		X
14. Is line 9 at least 6 times line 1?	X	_____
15. Is line 2 divided by line 4 less than 2.9?	X	_____
16. Is line 8 divided by line 2 greater than 0.1?	X	_____
17. Is line 5 divided by line 6 greater than 1.5?	X	_____

Alternative II

1. Sum of current closure and post-closure cost estimates
(total of all cost estimates shown in the four
paragraphs above) \$ 3,200
2. Current bond rating of most recent issuance of
this firm and name of rating service A-(Standard & Poor's)
3. Date of issuance bond December 14, 1982
4. Date of maturity bond December 1, 1992
- *5%. Tangible net worth (if any portion of the
closure and post-closure cost estimates is
included in "total liabilities" on your firm's
financial statements, you may add the amount of
that portion to this line) \$383,524,000
- *6. Total assets in U.S. (required only if less
than 90% of firm's assets are located in the U.S.) \$615,524,000

	Yes	No
7. Is line 5 at least \$10 million?	<u>X</u>	<u> </u>
8. Is line 5 at least 6 times line 1?	<u>X</u>	<u> </u>
*9. Are at least 90% of firm's assets located in the U.S.? If not, complete line 10	<u> </u>	<u>X</u>
10. Is line 6 at least 6 times line 1?	<u>X</u>	<u> </u>


I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(f) as such regulations were constituted on the date shown immediately below.

Enclosed are:

- (1) independent certified public accountants' (Arthur Young & Company) report on examination of this firm's financial statements for fiscal year ended December 31, 1982;
- (2) special report of Arthur Young & Company in accordance with 40 CFR 264.151 (f)(3)(iii).

Very truly yours,

By


J. Edward Sheridan
Vice President Finance &
Treasurer

Date: March 30, 1983

Enclosures

ARTHUR YOUNG

ARTHUR YOUNG & COMPANY
277 PARK AVENUE
NEW YORK, NEW YORK 10172

March 30, 1983

The Board of Directors
AMF Incorporated

We have examined the consolidated financial statements of AMF Incorporated for the year ended December 31, 1982 and have issued our report thereon dated February 15, 1983. Our examination was made in accordance with generally accepted auditing standards and, accordingly, included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances.

We have read the letter dated March 30, 1983 from J. Edward Sheridan, Vice President, Finance & Treasurer of AMF Incorporated, submitted to the Regional Administrator of the Environmental Protection Agency in support of the use of the financial test, as specified in Subpart H of 40 CFR Parts 264 and 265, to demonstrate financial responsibility for liability coverage and closure and post-closure care of the Corporation's hazardous waste treatment, storage and disposal facility at the location listed in Item 1 of the letter.

In this connection, we have compared to the independently audited consolidated financial statements of AMF Incorporated for the year ended December 31, 1982, the data in the letter indicated as being derived from such independently audited consolidated financial statements for the year ended December 31, 1982. In connection with this comparison, no matters came to our attention that caused us to believe that the specified data should be adjusted.

This report is solely to assist you in complying with the reporting requirements associated with the financial test, as specified in Subpart H of 40 CFR Parts 264 and 265, to demonstrate financial responsibility for liability coverage and closure and post-closure care, and should not be referred to or used for any other purpose.

Arthur Young & Company

REFERENCE NO. 3



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J. F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203

Nov 9 2 1984

October 18, 1984

ENVIRONMENTAL PROTECTION AGENCY

NEW YORK

Ernie Regna, Chief
EPA - Region II
Solid Waste Branch
26 Federal Plaza
New York, NY 10278

Dear Mr. Regna:

We have recently become aware of and taken an enforcement action against AMF Incorporated for their failure to submit adequate financial documentation (both assurance and insurance mechanisms) for their facilities located in Region I. Based on discussions we have had with Company representatives in settlement of our action, it is very possible that non-compliance with the financial regulations may effect all of the other RCRA facilities.

My staff has investigated the Company and found that the following facilities are located in your Region:

AMF Lowville Operations
NYD990762148

We are referring these to you for whatever follow-up action you believe appropriate. Should you have any questions, please contact Ms. Cindy Gilder, of my staff, at FTS 223-1906.

Sincerely,

Gerald M. Levy, Chief
Compliance/Monitoring & Enforcement

cc: D. Huebner
M. Thomas, ORC

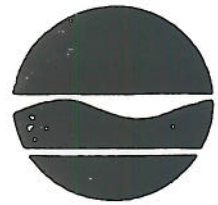
10/22
P. Am
CFA

Leila-
any problems
in Rg II?
Sam

REFERENCE NO. 4

OFFICE COPY

New York State Department of Environmental Conservation
50 Wolf Road, Albany, New York 12233-0001



Henry G. Williams
Commissioner

JUN 07 1985

Mr. Paul R. Guevin
Staff Chemist
AMF Incorporated
689 Hope Street
Stamford, CT 06907

D-6

C1105-6
FC 09

12/85
on

Dear Mr. Guevin:

Re: Reclassification of NYD990762148

As part of a request for reclassification of the above referenced facility to a generator only status, you were asked by this Department to submit a closure plan addressing activities to take place when the facility is actually being closed. As requested, the closure plan was submitted, and upon review, it is deemed that this plan meets the performance standards as stipulated in 6 NYCRR Part 360, and hereby, its approval is granted. As a generator only facility all storage of hazardous materials will then be less than 90 days. You should note that when the facility is being closed in the future, the closure must be carried out in accordance with the approved closure plan and certified by a registered professional engineer.

Furthermore, to terminate your facility's TSD interim status, an official formal request for call in and denial of the Part B Permit should be made, in writing, to the Environmental Protection Agency (EPA). Upon receipt of this request, the EPA will publish a Notice of Intent to deny the facility's RCRA Part B Permit. This denial is legally required in order to affect a Part A withdrawal. Following the required comment period for this notice, you will be contacted insofar as your facility's reclassification status. You should note that failure to submit this request may result in your facility remaining subject to all applicable regulatory fees as a TSDF.

The aforementioned request should be forwarded to:

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

Mr. Guevin:


Page 2

with carbon copies to:

Mr. John L. Middelkoop, P.E.
Supervisor Permits Section - Room 401
New York State Department of Environmental Conservation
Bureau of Hazardous Waste Technology
Division of Solid and Hazardous Waste
50 Wolf Road
Albany, New York 12233

If you should have any questions or comments regarding the above, please contact George W. Heitzman at (518) 457-3274.

Sincerely,

 P.E.
John L. Middelkoop, P.E.
Supervisor
Permits Section
Bureau of Hazardous Waste Technology

cc: J. Kenna, DEC Region 6

REFERENCE NO. 5



BOWLING PRODUCTS GROUP
161 Heatherdown Drive, Westerville, Ohio 43081 • 614/891-4740
AMF INCORPORATED

June 25, 1985

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

Reference: Reclassification of NYD990762148

Dear Mr. Baker:

*30 June 08
851031
UP*

John L. Middelkoop, Supervisor Permits Section for the New York Department of Environmental Conservation has informed us that they have approved a closure plan which meets the performance standards as stipulated in 6NYCRR Part 360 and has granted approval of our request for reclassification. In his letter, Mr. Middelkoop informs us that an official formal request for call in and denial of the Part B Permit for the above reference permit should be made to you to terminate our facility's TDS interim status. We thereby make such a request.

It is our understanding that, upon receipt of this request, you will publish a Notice of Intent to deny the Lowville facility's RCRA Part B Permit. We are informed that this denial is legally required in order to affect a Part A withdrawal.

If you have any questions, please contact me at the address now shown in the stationery letterhead.

Sincerely,

Paul R. Guevin
Paul R. Guevin
Senior Chemist

PRG/kp

xc: Mr. John L. Middelkoop
P. C. Ackermann
C. K. Carpenter
R. C. Mallette

REFERENCE NO. 6

NUS CORPORATION AND SUBSIDIARIES

TELECON NOTE

CONTROL NO.:

DATE:

TUES. Apr 2, 1991 / WED Apr 3

TIME: 4/2/91

4:45 P.m

4/3/91

1:50 P.m

DISTRIBUTION:

- cc to:
1. Site File
 2. Pat Hastings
 3. DAPM

BETWEEN:

DARREYL Swerdowski

OF:

NYS DEC
REGION 6

PHONE:

(315) 785-2236

AND:

John Copman, Environmental Scientist

Edison NJ

(NUS)

DISCUSSION:

I made the initial call Tues April 2, 1991 regarding the status of AMF Lowville Operations, Lowville NY. Although Darrel Swerdowski is listed as my Region 6 contact, he is not available.

4-3-91 Darrel Swerdowski returns my call & promptly informs that Tom Morgan is out & is not free to speak with Morgan is not available at this time.

4-4-91 9:00 A.M.

Tom Morgan, NYSDDEC region 6 calls, advises me that the information in our AMF file is essentially correct and up to date. He stated that based on all information gathered, AMF is to be considered an "ERRONEOUS ALER"

ACTION ITEMS:

REFERENCE NO. 7

EPA ID NO.	SITE NAME STREET CITY COUNTY CODE AND NAME	STATE ZIP CONG DIST.	NFA. FLAG	OPRBL UNIT	EVENT TYPE	ACTUAL START DATE	ACTUAL COMPL DATE	CURRENT EVENT LEAD
NYD002066330 (CONTINUED)	AMERICAN THERMOSTAT CO.			(00)	DS1 PA1 HR1 NP1 NF1 SI1 SI2 AS1 CR1 WP1 CO1 RO1 TA1 RD1 MA1 WP1 CO1 RO1 RD1	05/01/82 08/01/82 12/01/82 12/01/82 09/01/83 12/01/82 12/01/82 04/29/88 02/13/86 07/10/87 07/10/87 09/30/87 04/14/88 06/26/87 01/04/88 12/14/87 09/30/90	05/01/82 08/01/82 12/01/82 12/01/82 09/01/83 12/01/82 12/01/82 04/29/88 02/13/86 07/10/87 07/10/87 09/30/87 04/14/88 06/26/87 01/04/88 12/14/87 09/30/90	EPA (FUND) EPA (FUND) EPA (FUND) EPA (FUND) EPA (FUND) EPA (FUND) STATE(FUND) EPA (FUND) EPA (FUND) EPA (FUND) EPA (FUND) EPA (FUND) EPA (FUND) STATE(FUND) EPA (FUND) EPA (FUND) EPA (FUND) EPA (FUND)
NYD002069573	AMERICAN VALVE 170 MANSTON ST COXSACKIE 039 GREENE	NY 12051		00	DS1 PA1 SI1	07/06/87	07/01/79 07/09/87 06/28/90	EPA (FUND) STATE(FUND) EPA (FUND)
NYD096930466	AMES CHEM 21 ROGER ST GLENS FALLS 113 WARREN	NY 12801	NFA	00	DS1 PA1	11/11/87 12/30/87	11/11/87 12/30/87	EPA (FUND) EPA (FUND)
NYD986943637	AMFAR ASPHALT CORPORATION TOWN LINE ROAD KINGS PARK 103 SUFFOLK	NY 11754		00	DS1 PA1 SI1	11/26/20 11/26/90	02/15/91 02/15/91 02/15/91	EPA (FUND) STATE(FUND) STATE(FUND)
NYD990762148	AMFLOWVILLE OPERATIONS INTERSECTION NY RTS 12 AND 26 LOWVILLE 049 LEWIS	NY 13367		00	DS1	08/24/90	08/24/90	EPA (FUND)

REFERENCE NO. 8

LEVEL: REGION: 02
 SELECTION: INTEGRATED
 SEQUENCE: REG, ST, SITE NAME
 U.S. EPA SUPERFUND PROGRAM
 ** C E R C L I S **

LIST-4: SITE ALIAS LOCATION LISTING

REGION: 02

EPA ID	SITE/ALIAS NAME STREET CITY COUNTY NAME	STATE COUNTY	ZIP CODE	ALIAS SEQ. #	NAME SOURCE	FED FAC
NYD002066330 (CONTINUED)	AMERICAN THERMOSTAT CO. GREENE	NY		01		
NYD002069573	AMERICAN VALVE 170 MANSION ST COXSACKIE GREENE	NY 039	12051	STS	N	
NYD096930466	AMES CHEM 21 ROGER ST GLENS FALLS WARREN	NY 113	12801	STS	N	
	AMES CHEM WARREN	NY		01		
NYD986943637	AMFAR ASPHALT CORPORATION TOWN LINE ROAD KINGS PARK SUFFOLK	NY 103	11754		N	
NYD990762148	AMFLOWVILLE OPERATIONS INTERSECTION NY RTS 12 AND 26 LOWVILLE LEWIS	NY 049	13367		N	
	AMFLOWVILLE OPERATIONS			01		
NYD000513721	AMHERST DUMP HOPKINS RD AMHERST ERIE	NY 029	14226	STS	N	
NYD037373024	AMSTERDAM TRANSFER FLORIDA NEW YORK AMSTERDAM MONTGOMERY	NY 057	12010	STS	N	