

DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

RCRA Corrective Action Environmental Indicator (EI) RCRAInfo code (CA725) Current Human Exposures Under Control

Facility Name: Qubica AMF
Facility Address: 7412 Utica Blvd., Lowville
Facility EPA ID #: NYD990762148

BACKGROUND

Definition of Environmental Indicators (for the RCRA Corrective Action)

Environmental Indicators (EIs) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EIs developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

Definition of “Current Human Exposures Under Control” EI

A positive “Current Human Exposures Under Control” EI determination (“YE” status code) indicates that there are no “unacceptable” human exposures to “contamination” (i.e., contaminants in concentrations in excess of appropriate risk-based levels) that can be reasonably expected under current land- and groundwater-use conditions (for all “contamination” subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

Relationship of EI to Final Remedies

While Final remedies remain the long-term objective of the RCRA Corrective Action program the EIs are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993, GPRA). The “Current Human Exposures Under Control” EI are for reasonably expected human exposures under current land- and groundwater-use conditions ONLY, and do not consider potential future land- or groundwater-use conditions or ecological receptors. The RCRA Corrective Action program’s overall mission to protect human health and the environment requires that Final remedies address these issues (i.e., potential future human exposure scenarios, future land and groundwater uses, and ecological receptors).

Duration / Applicability of EI Determinations

EI Determinations status codes should remain in RCRAInfo national database ONLY as long as they remain true (i.e., RCRAInfo status codes must be changed when the regulatory authorities become aware of contrary information).

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1. Has **all** available relevant/significant information on known and reasonably suspected releases to soil, groundwater, surface water/sediments, and air, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units (SWMU), Regulated Units (RU), and Areas of Concern (AOC)), been **considered** in this EI determination?

 X If yes - check here and continue with #2 below.

 If no - re-evaluate existing data, or

 If data is not available skip to #6 and enter "IN" (more information needed) status code.

Background - The Qubica AMF site consisted of a single container storage area (CSA) located at 7412 Utica Boulevard, Lowville, NY. The CSA, a 45' x 36' garage, stored chemicals utilized in the manufacture of bowling pins, including: acetone, PM Acetate, xylene, and urethane. The CSA was in used from approximately 1977 to 1988. The CSA was certified closed by the Department, in a letter dated November 22, 1988, from James H. Shanley, PE.

The average time chemicals resided in the CSA was two weeks. All containers were new from the manufacturers. No releases are associated with the CSA.

2. Are groundwater, soil, surface water, sediments, or air **media** known or reasonably suspected to be "**contaminated**"¹ above appropriately protective risk-based "levels" (applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action (from SWMUs, RUs or AOCs)?

	YES	NO	?	Rationale/Key Contaminants
Groundwater		X		No releases. Certified Closed in 1988.
Air (indoors) ²		X		No releases. Certified Closed in 1988.
Surface Soil (e.g., <2 ft)		X		No releases. Certified Closed in 1988.
Surface Water		X		No releases. Certified Closed in 1988.
Sediment		X		No releases. Certified Closed in 1988.
Subsurface Soil (e.g., >2 ft)		X		No releases. Certified Closed in 1988.
Air (outdoors)		X		No releases. Certified Closed in 1988.

¹"Contamination" and "contaminated" describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriately protective risk-based "levels" (for the media, that identify risks within the acceptable risk range).

²Recent evidence (from the Colorado Dept. of Public Health and Environment, and others) suggests that unacceptable indoor air concentrations are more common in structures above groundwater with volatile contaminants than previously believed. This is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration necessary to be reasonably certain that indoor air (in structures located above (and adjacent to) groundwater with volatile contaminants) does not present unacceptable risks.

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- X If no (for all media) - skip to #6, and enter “YE,” status code after providing or citing appropriate “levels,” and referencing sufficient supporting documentation demonstrating that these “levels” are not exceeded.
- If yes (for any media) - continue after identifying key contaminants in each “contaminated” medium, citing appropriate “levels” (or provide an explanation for the determination that the medium could pose an unacceptable risk), and referencing supporting documentation.
- If unknown (for any media) - skip to #6 and enter “IN” status code.

Rationale and Reference(s):

No releases. Certified Closed in 1988.

3. Are there **complete pathways** between “contamination” and human receptors such that exposures can be reasonably expected under the current (land- and groundwater-use) conditions?

Summary Exposure Pathway Evaluation Table

	Potential <u>Human Receptors</u> (Under Current Conditions)						
<u>“Contaminated” Media</u>	Residents	Workers	Day- Care	Construction	Trespassers	Recreation	Food ³
Groundwater	---	---	---	---	---	---	---
Air (indoors)	---	---	---	---	---	---	---
Soil (surface, e.g., <2 ft)	---	---	---	---	---	---	---
Surface Water	---	---	---	---	---	---	---
Sediment	---	---	---	---	---	---	---
Soil (subsurface e.g., >2 ft)	---	---	---	---	---	---	---
Air (outdoors)	---	---	---	---	---	---	---

Instructions for Summary Exposure Pathway Evaluation Table:

1. Strike-out specific Media including Human Receptors’ spaces for Media which are not “contaminated” as identified in #2 above.
2. enter “yes” or “no” for potential “completeness” under each “Contaminated” Media -- Human Receptor combination (Pathway).

Note: In order to focus the evaluation to the most probable combinations some potential “Contaminated” Media - Human Receptor combinations (Pathways) do not have check spaces

³ Indirect Pathway/Receptor (e.g., vegetables, fruits, crops, meat and dairy products, fish, shellfish, etc.)

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("_---_"). While these combinations may not be probable in most situations they may be possible in some settings and should be added as necessary.

- _____ If no (pathways are not complete for any contaminated media-receptor combination) - skip to #6, and enter "YE" status code, after explaining and/or referencing condition(s) in-place, whether natural or man-made, preventing a complete exposure pathway from each contaminated medium (e.g., use optional Pathway Evaluation Work Sheet to analyze major pathways).
- _____ If yes (pathways are complete for any "Contaminated" Media - Human Receptor combination) - continue after providing supporting explanation.
- _____ If unknown (for any "Contaminated" Media - Human Receptor combination) - skip to #6 and enter "IN" status code

Rationale and Reference(s):

Type Here

4. Can the **exposures** from any of the complete pathways identified in #3 be reasonably expected to be **"significant"**⁴ (i.e., potentially "unacceptable" because exposures can be reasonably expected to be: 1) greater in magnitude (intensity, frequency and/or duration) than assumed in the derivation of the acceptable "levels" (used to identify the "contamination"); or 2) the combination of exposure magnitude (perhaps even though low) and contaminant concentrations (which may be substantially above the acceptable "levels") could result in greater than acceptable risks)?

- _____ If no (exposures cannot be reasonably expected to be significant (i.e., potentially "unacceptable") for any complete exposure pathway) - skip to #6 and enter "YE" status code after explaining and/or referencing documentation justifying why the exposures (from each of the complete pathways) to "contamination" (identified in #3) are not expected to be "significant."
- _____ If yes (exposures could be reasonably expected to be "significant" (i.e., potentially "unacceptable") for any complete exposure pathway) - continue after providing a description (of each potentially "unacceptable" exposure pathway) and explaining and/or referencing documentation justifying why the exposures (from each of the remaining complete pathways) to "contamination" (identified in #3) are not expected to be "significant."
- _____ If unknown (for any complete pathway) - skip to #6 and enter "IN" status code

Rationale and Reference(s):

⁴ If there is any question on whether the identified exposures are "significant" (i.e., potentially "unacceptable") consult a human health Risk Assessment specialist with appropriate education, training and experience.

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Type Here

5. Can the “significant” **exposures** (identified in #4) be shown to be within **acceptable** limits?

- _____ If yes (all “significant” exposures have been shown to be within acceptable limits) - continue and enter “YE” after summarizing and referencing documentation justifying why all “significant” exposures to “contamination” are within acceptable limits (e.g., a site-specific Human Health Risk Assessment).
- _____ If no (there are current exposures that can be reasonably expected to be “unacceptable”)- continue and enter “NO” status code after providing a description of each potentially “unacceptable” exposure.
- _____ If unknown (for any potentially “unacceptable” exposure) - continue and enter “IN” status code


Rationale and Reference(s):

Type Here

6. Check the appropriate RCRA Info status codes for the Current Human Exposures Under Control EI event code (CA725), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (and attach appropriate supporting documentation as well as a map of the facility):

- X** YE - Yes, “Current Human Exposures Under Control” has been verified. Based on a review of the information contained in this EI Determination, “Current Human Exposures” are expected to be “Under Control” at the Qubica AMF facility, EPA ID # NYD990762148, located at 7412 Utica Blvd., Lowville, New York under current and reasonably expected conditions. This determination will be re-evaluated when the Agency/State becomes aware of significant changes at the facility.
- _____ NO – “Current Human Exposures” are NOT “Under Control.”
- _____ IN - More information is needed to make a determination.

Completed by:



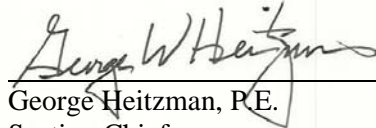
James Candiloro, P.E.
Project Manager

Date: February 1, 2012

**Current Human Exposures Under Control
Environmental Indicator (EI) RCRAInfo Code (CA725)**

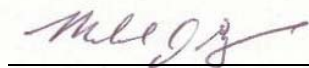
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Supervisor:


George Heitzman, P.E.
Section Chief

Date: February 1, 2012

Director:



Michael J. Ryan, P.E.
Director, Bureau C
Division of Environmental Remediation

Date: February 1, 2012

Locations where References may be found:

New York State Department of Environmental Conservation, Central Office
Division of Environmental Remediation
625 Broadway 11th Floor
Albany, New York 12233-7014

Contact telephone and e-mail numbers:

James Candiloro
(518) 402-9662
jxcandil@gw.dec.state.ny.us

FINAL NOTE: THE HUMAN EXPOSURES EI IS A QUALITATIVE SCREENING OF EXPOSURES AND THE DETERMINATIONS WITHIN THIS DOCUMENT SHOULD NOT BE USED AS THE SOLE BASIS FOR RESTRICTING THE SCOPE OF MORE DETAILED (E.G., SITE-SPECIFIC) ASSESSMENTS OF RISK.



July 25, 2011

JUL 26 2011

Mr. James Candiloro
NYSDEC-DER
Remedial Bureau E, Remedial Section A
625 Broadway
Albany, NY 12233-7014

Re: SWMU

Dear Mr. Candiloro,

Enclosed are QubicaAMF SWMU questionnaire and additional site information

If you have any questions, feel free to call 315-376-6541

Sincerely,

Wayne White
General Manager/VP



SECTION 1 CONTENTS

JUL 28 2011

- **CHECKLIST**
- **CERTIFICATION OF ANSWERS**
- **PART 2. FACILITY CHARACTERIZATION**
- **PART 3-1, CSAs AND TRANSFER STATIONS (CSA1)**
- **ATTACHMENTS**
 - **FACILITY SITE PLAN WITH SWMU CODE (TRINITY AVENUE SITE)**
 - **NOV. 22, 1988 NYS DEC CLOSURE CERTIFICATION LETTER**
 - **BLACK RIVER WATERSHED AQUIFER MAP**

Qubica AMF

This report pertains to the former Container Storage Area (CSA1) located at the former Trinity Avenue Site in Lowville, NY. This

CHECKLIST

unit was certified closed November 22, 1988 by the NYS DEC, as per attached letter from James H. Shanley, P.E., Senior Sanitary Engineer.

The following is a checklist that identifies a completed questionnaire response package. Each box indicates a required portion of the submittal. Note that Part 2, the facility characterization form, the facility site plan (with SWMU code), and questionnaire certification form are required. The Number of Part 3 sections submitted will be facility-specific. The lines corresponding to 3-1 through 3-9 should indicate that the number of units at your facility within each SWMU category and should correspond to the number of questionnaire packets submitted for these sections. Please return a copy of this checklist with your responses.

PART 2. FACILITY CHARACTERIZATION ☒

FACILITY SITE PLAN WITH SWMU CODE ☒

PART 3. SWMU IDENTIFICATION/ RELEASE/ REMEDIATION ☒

		Active	Inactive
3-1	CSAs AND TRANSFER STATIONS	0	1
3-2	LAND DISPOSAL (excluding land application and injection wells)	0	0
3-3	WASTEWATER TREATMENT/ RECYCLING UNITS	0	0
3-4	STORAGE/TREATMENT TANKS (excluding 3-3 units)	0	0
3-5	LAND APPLICATION AREAS	0	0
3-6	INJECTION WELLS	0	0

		Active	Inactive
3-7	INCINERATOR AND THERMAL UNITS	0	0
3-8	OTHER (CAMU, TU)	0	0
3-8	OTHER (AREAS OF CONCERN)	0	0

QUESTIONNAIRE CERTIFICATION

☒

RESPONSE CHECKLIST

☒

CERTIFICATION OF ANSWERS TO
REQUEST FOR INFORMATION REGARDING
SOLID WASTE MANAGEMENT UNITS
AND/OR AREAS OF CONCERN

FACILITY NAME: Qubica AMF

FACILITY EPA ID: NYD990762148

STATE OF: New York

COUNTY OF: Lewis

I certify that the enclosed answers to the New York Department of Environmental Conservation request for information are true, complete and accurate to the best of my knowledge and belief and that any documents submitted herewith are complete and authentic to the best of knowledge and belief.

This report pertains to the former Container Storage Area (CSA1) located at the former Trinity Avenue Site in located in Lowville, NY. This unit was certified closed November 22, 1988 by the NYS DEC, as per attached letter from James H. Shanley, P.E., Senior Sanitary Engineer.


Signature of Facility Representative

7/22/11
Date

Wayne White
Printed Name of the Signee

General Manager
Title of Signee

PART 2. FACILITY CHARACTERIZATION FORM

2-1. FACILITY IDENTIFICATION AND LOCATION

1. Facility Name: Qubica AMF
2. EPA ID No.: NYD990762148
3. SIC Code: 2499
4. Location: 7412 Utica Blvd.
City Lowville State NY County Lewis
5. Telephone No.: 315-376-6541
6. Check: Owner X Operator X

2-2 FACILITY PROCESS DESCRIPTION

- Hardmaple lumber, topcoat chemicals, and
decorating inks.
1. Raw Materials Used: _____
 2. Products.: Bowling Pins
 3. Byproducts: Sawdust
- Recycled? Yes Specify: Burned in Plant Boiler
- Treated? No Specify: _____

2-3. FACILITY ENVIRONS

Please provide the following information if available:

1. Distance to nearest drinking water source (well and/or aquifer): 10 miles to the Village of Lowville surface water wells located off the No. 4 Rd, Town of Watson.
2. Depth to uppermost aquifer: Site is not located on an aquifer, per attached Black River Watershed Aquifer Map.
3. Distance to nearest surface water body: 0.5 mile to Mill Creek.
4. Surface water use: Mill Creek is the receiving waters for the Village of Lowville POTW.
5. Distance to nearest offsite building: 350 feet

6. Distance to nearest sensitive environment (e.g., wet-preserved area, or critical habitat):
1.7 miles to State Wetland L-13 (due East)
7. Percent of facility lying within 100 year floodplain: 0% (0 Acres of 8.76
Total acres = 0 %)
8. Land use/zoning:
- ~~Complete remote-~~
- ~~Agricultural-~~
- *Commercial or Industrial*
- ~~Residential-~~
9. Net annual precipitation (estimate): 41.3 inches
10. Soil permeability (e.g., clay, sand; particle size): Rhinebeck silt loam, 1 to 6% slope.
Drainage Class: Somewhat poorly drained
11. Population within 5 miles:
- 5,100 persons within a 5 mile radius (estimate)
- 3,500 persons Village of Lowville population
- 27,087 persons Lewis County population

3-1 TRANSFER STATION & CONTAINER STORAGE AREAS (CSAs)

NOTE: COMPLETE 3-1.1 THROUGH 3-1.3 FOR EACH INDIVIDUAL TRANSFER STATION & CONTAINER STORAGE AREA (CSA)
SWMU WHICH IS CURRENTLY OR HAS PREVIOUSLY BEEN OPERATED ON YOUR SITE

3-1.1 WASTE CHARACTERISTICS

Provide the following information regarding the wastes that are/were stored in each transfer station/CSA on your site. Identify the unit according to your map identifier code and provide the appropriate EPA process code². Indicate the operational status of unit, identify the first year of operation for active unit or the inclusive dates of operation (from - to) for units presently inactive. Include the hazardous waste code from the 40 CFR, subpart D for each of listed hazardous waste handled at that unit². If you handle/handled hazardous wastes which are not cited in 40 CFR, subpart D, enter the code(s) from 40CFR, subpart C that describe(s) the characteristic and/or the toxic constituents of those hazardous wastes. For any wastes which do not have a corresponding EPA hazardous waste number, please determine, as best you can, if the particular waste would be considered a hazardous waste or to contain hazardous waste constituent(s) under RCRA and provide waste description². For each Waste, indicate the quantity that was/ is handled on an ANNUAL. Provide the appropriate unit of measure (e.g., tons, cubic yards, drums or gallons). Please indicate (x) in the last column if any prior or current release of hazardous waste or hazardous waste constituents was/is associated with the unit described.

SWMU TYPE/ UNIT IDENTIFIER ²	DIMENSIONS STORAGE AREA	OPERATIONAL STATUS	EPA PROCESS ² CODE	EPA HAZARDOUS WASTE NO. OR HAZARDOUS WASTE DESCRIPTION	ESTIMATED ANNUAL QUANTITY (SPECIFY UNITS)	ASSOCIATED RELEASES?
CSA1	45' X 36' Garage	ACTIVE No	S06	Acetone, U002	2,800 lb/yr	No
(Container Storage Area 1 was located at the former Trinity Avenue Site, certified closed Nov 22, 1988, by NYS DEC.)	VOLUME DRUM	YEAR START		PM Acetate (1-Methoxy 2-Propyl Acetate)	18,321 lb/yr	No
	2,200 gal			CAS# 108-65-6		
	NUMBER DRUMS	INACTIVE YES		Xylene, U239	1,554 gal/yr	No
	40 drums max	FROM: 1977		Urethane (Contains 9.0% Ethyl Benzene CAS#	60,000 lb/yr	No
		TO: 11/22/88		100-41-4, & 49.3% Xylene U239)		
		certified closed				

3-1 TRANSFER STATION & CONTAINER STORAGE AREAS (CSAs)

3-1.2 WASTE MANAGEMENT PRACTICES

Please answer the following question concerning waste management practices associated with the transfer station/CSA identified on the preceding page

1. If containers or drums are/were used, please specify their condition. Describe materials of construction if know

Excellent	Good	Fair	No Known	Comment
				Drums were new drums from the suppliers.

2. What was/is the average time of chemicals in the transfer station/CSA?

NK	Chemical	Residence Time (Units)/ Comment
	Acetone	2 week average residence time.
	PM Acetate	2 week average residence time.
	Xylene	2 week average residence time.
	Urethane	2 week average residence time.

3. Were/are reactive, ignitable, or incompatible wastes placed in this Unit

Yes	No	NK	Description/Comments
X			All 4 chemicals were ignitable.

Qubica AMF

CSA1

Unit ID:
Page: 3 of 6

3-1 TRANSFER STATION & CONTAINER STORAGE AREAS (CSAs)

If so, are/were the wastes stored, treated, rendered or mixed so that it not longer poses/posed a hazard?

Yes	No	NK	If yes, mitigative treatment?	Comment
	X			Container storage area was certified closed in 1988.

4. Was/is the unit surrounded by a containment system? What was/is the capacity of the containment system?

Yes	No	NK	Capacity (units)/Comments
	X		

Indicate whether the unit is/was located indoors or outdoors. If located outdoors, indicate if the area is/was protected from the weather (e.g., rain, snow)

INDOOR	OUTDOOR	NK	COMMENTS
X			The unit was located inside a weather proof garage, constructed of concrete blocks. The garage was torn down in the late 1980's.
PROTECTED	UNPROTECTED	NK	COMMENTS

Please describe any precautionary measures that are/were taken

PRECAUTIONARY MEASURES

A locked perimeter fence surrounded the garage.

Qubica AMF
CSA1

Unit ID:
Page: 4 of 6

3-1 TRANSFER STATION & CONTAINER STORAGE AREAS (CSAs)

3-1.3 EVIDENCE OF RELEASE/REMEDIATION

Please provide the following information on any prior or current release of hazardous waste or hazardous waste constituents associated with the transfer station/CSA described in the preceding pages.

Evidence of Release

None	Indirect*	Positive Proof from Laboratory Analyses	<u>Description/Comment</u>
X			The unit was certified closed November 22, 1988 Reference the attached Closure Letter dated November 22, 1988 from the NYS DEC.
* e.g., discoloration of surrounding soil, dead vegetation			

Characteristic of Release	N/A
---------------------------	-----

[illegible]

Qubica AMF

CSA1

Unit ID:
Page: 5 of 6

3-1 TRANSFER STATION & CONTAINER STORAGE AREAS (CSAs)

1 Unit ID as coded on your facility site map CSA1

2 EPA process Codes, EPA Hazardous Waste Codes from Subparts C and D and Criteria constituting waste regulated under RCRA are defined in Part 1 DEFINITIONS of this Questionnaire

For the unit described above, please provide any analytical data that may be available which would describe the nature and/or extent of environmental contamination that exists/existed as a result of release. Any information on the concentration of hazardous waste or hazardous waste constituents in contaminated soil, groundwater (GW), surface water (SW) or air should attached. Include any information/data (including groundwater monitoring data) submitted to EPA and/or NYSDEC under any other regulatory programs (e.g., Superfund) that concerns prior or continuing releases as described above. If any analytical data are attached for this unit, please indicate below:

GW Monitoring Data Attached	SW Analytical Data Attached	Soil Analytical Data Attached	Air Monitoring Data Attached	
N/A	N/A	N/A	N/A	

For the prior/current release documented above please describe relevant remediation implemented or planned.

Previously
Implemented N/A

Yes	No	NK	Inclusive Dates	Description/ COMMENT

Currently
Implemented N/A

Yes	No	NK	Inclusive Dates	Description/ COMMENT

Qubica AMF
CSA1

Unit ID:
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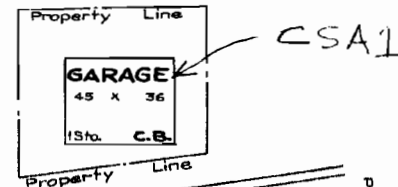
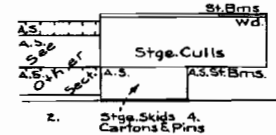
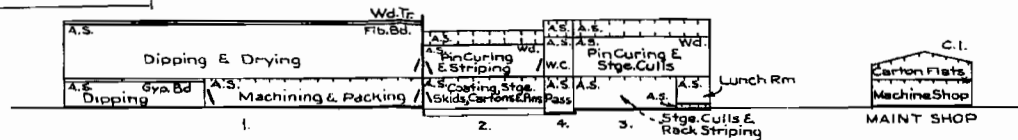
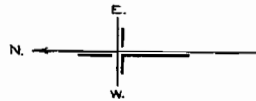
3-1 TRANSFER STATION & CONTAINER STORAGE AREAS (CSAs)				
1 Unit ID as coded on your facility site map CSA1				
Planned to be Implemented N/A				
Yes	No	NK	Inclusive Dates	Description/ COMMENT
1 Unit ID as coded on your facility site map				

ATTACHMENTS

QUBICA AMF

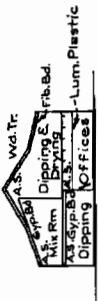
NYD990762148

FORMER TRINITY AVENUE SITE

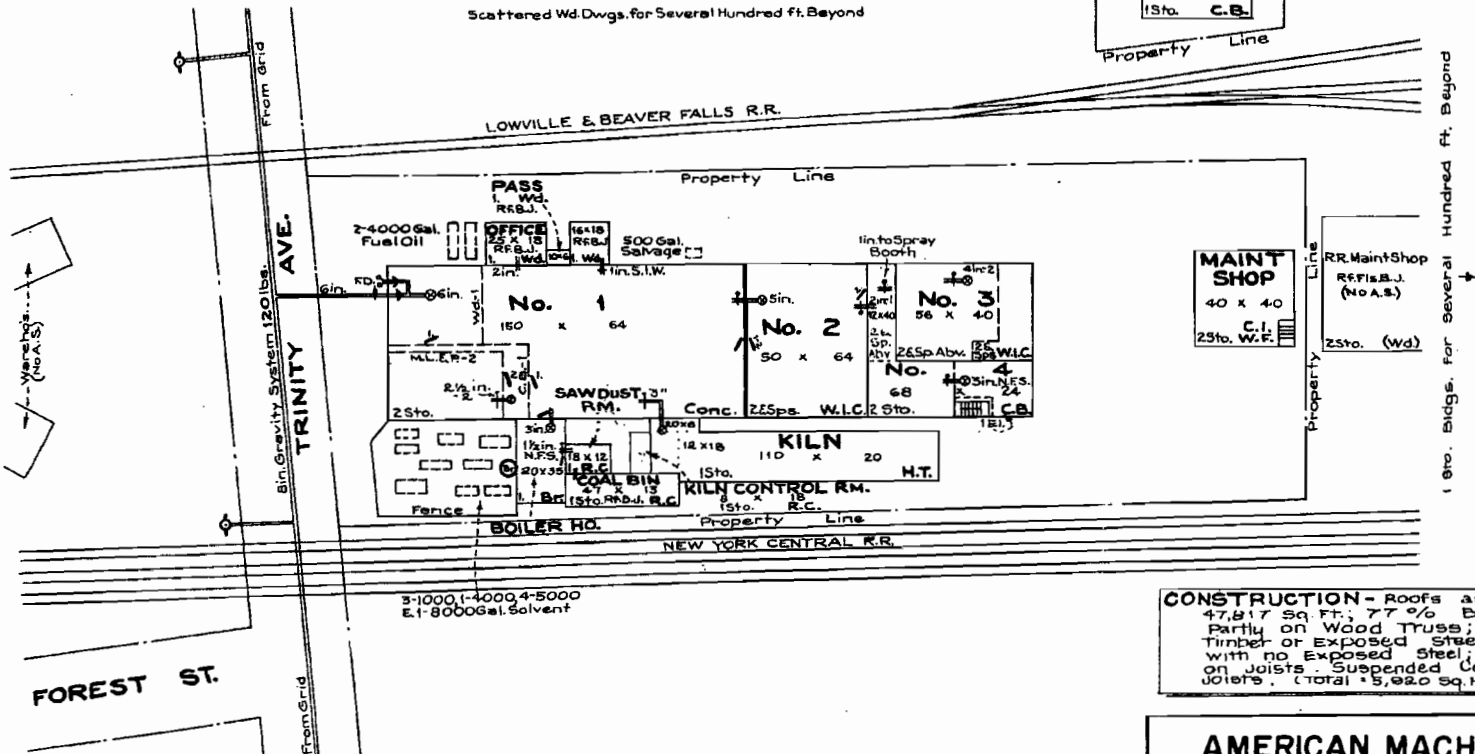


Scattered Wd. Dwgs. for Several Hundred ft. Beyond

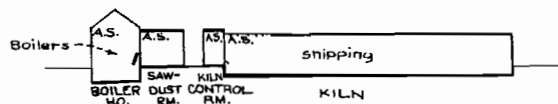
LOWVILLE & BEAVER FALLS R.R.



Commercial Bldgs. for Several Hundred ft. Beyond



Scattered Wd. Dwgs. for Several Hundred ft. Beyond



CONSTRUCTION - Roofs and Floors total Approx. 47,817 Sq. Ft.; 77 % Boards on Joists, Partly on Wood Truss; 15 % Plank on Timber or Exposed Steel; 8 % Non-combustible with no exposed steel; 5 % Corrugated iron on Joists. Suspended Ceilings are Boards on Joists. (Total 15,920 Sq. Ft.)

AMERICAN MACHINE & FOUNDRY COMPANY
"LOWVILLE PLANT"
Lowville, N.Y.

Scale 1 in. = 50 Ft.
Data From R.A. Grady, 7-26-65 By R. Guerrini.

FACTORY MUTUAL ENGINEERING DIVISION
Associated Factory Mutual Fire Insurance Cos.
Norwood, Mass.

SERIAL B-5943

INDEX 26548.4

KEY:

CSA1: CONTAINER STORAGE AREA 1

4.
1
New York State Department of Environmental Conservation
50 Wolf Road, Albany, New York 12233



Thomas C. Jorling
Commissioner

November 22, 1988

Mr. Donald Schneider
AMF, Incorporated
Utica Boulevard
Lowville, NY 13367

RE: Closure of AMF, Lowville
EPA Identification Number: NYD990762148

Dear Mr. Schneider:

This confirms receipt of the independent registered professional engineer's certification (dated September 23, 1988) of RCRA closure for the above referenced facility. This also will confirm the owner/operation prior closure certification and our own (DEC) inspection of June 23, 1988 which also confirmed that the hazardous waste storage unit had been closed following the required public notice in December, 1985.

We now consider the subject facility officially closed. Certification of closure releases AMF from all financial assurance responsibilities for the closed storage facility.

If you have any questions concerning this matter, feel free to call me at (518) 457-3274.

Sincerely,

James H. Shanley, P.E.
Senior Sanitary Engineer
RCRA Program Support Section
Bureau of Hazardous Waste Program Development
Division of Hazardous Substances Regulation

cc: H. Mulholland, USEPA, Region II
J. Kenna, Region 6
T. Morgan, Region 6

Figure 7 – Aquifers Map

