



## New York State Department of Environmental Conservation

## MEMORANDUM

TO: Ann DeBarbieri, Deputy Commissioner  
FROM: Michael J. O'Toole, Jr., Director, Division of Hazardous Waste Remediation  
SUBJECT: Endicott Wellfield Site, Village of Endicott, Broome Co., NY, Site No. 7-04-008

DATE:

SEP 14 1992

A handwritten signature in cursive script, reading "Michael J. O'Toole Jr.".

Attached is a briefing paper for the Commissioner relative to the proposed remedy for this inactive hazardous waste site.

Attachment

RWS/td

bcc: M. O'Toole (2)  
C. Goddard  
E. Belmore  
R. Schick

**ISSUE:** Requirements for the closure of the Endicott Landfill, an inactive municipal landfill listed on the National Priorities List (NPL), which has been the subject of an RI/FS under the Federal Superfund Program conducted by IBM, one of the PRP's.

**Background:** The Endicott Landfill, Site No. 7-04-008, was listed on the NPL due to its apparent impact on the nearby municipal water supply. The current action addresses the landfill as a source of the contamination impacting the Village of Endicott water supply wells. Several previous actions have been initiated to protect the wells, including the installation of an air stripper on the well under the EQBA Title 3 program. In addition a purge well was installed in 198\_ and another is currently under design to intercept the contaminant plume from the landfill before it reaches the municipal well.

**Current Situation:** The USEPA has issued a Proposed Remedial Action Plan (PRAP) which identifies the source of the contamination impacting the wells as the former municipal landfill, which received hazardous waste and substances from various local industries, among them IBM. The PRAP calls for the installation of a low permeability soil cover or asphalt, leachate collection and gas venting. No further steps to collect, contain or otherwise address the groundwater contamination other than the existing and planned purge wells was proposed. The NYSDEC and the NYSDOH have concurred with this PRAP.

The low permeability soil cover will be a "hybrid" cover system, including provision for the use of asphalt at minimal slopes in two areas; the first where the Village carries out a yard waste composting operation and the other in the flight path of the municipal airport where Federal Aviation Agency regulations may restrict changes in the elevation of the surface. The PRP (IBM) requested and was granted a variance from the requirements for a full Part 360 capping system, which lead to the "hybrid" system proposed. This system is similar to that being evaluated as part of the mandate relief effort for Part 360 landfill closures. This variance was based on a number of factors: (1) The fact that this landfill is saturated from the bottom up during periods of high river stage (The Susquehanna River borders the site) therefore the goal of eliminating any leachate generation represent by a full 360 cap could not be met , (2) The landfill is immediately adjacent to an airport so the need to minimize the height of any capping system was recognized and (3) based on number 1 the gain to environmental protection from a full 360 cap was not economically justified. The PRP request for a variance from the minimum slope requirements was denied since any lesser slope would not achieve the needed runoff and would not be sound engineering design.

**RESPONSE:** The system now advocated by the PRP does not represent a cap of any kind. The proposal is to simply place fill in existing depressions or cover where fill material is visible at the surface. No grading of the landfill to promote drainage is planned nor are

any measures to vent or otherwise control landfill gas.

This system does not address the concerns of the NYSDOH regarding landfill gas generation nor potential contact with the waste fully since an engineered cap is not being installed. This is of particular concern since the Village has indicated a strong desire to develop this 50 acre parcel as an executive golf course.

This system is unacceptable to the NYSDEC since it is not in compliance with Part 360. The native soil cap proposed will do nothing to promote runoff and minimize infiltration. It has been argued that since the fill can be saturated from the bottom in either system, this should not be a concern, however these flood events are episodic and of generally short duration while infiltration is year round occurring at times of both high and low groundwater. The basis for the acceptance of the proposed method of addressing the groundwater utilizing the purge wells, while less than ideal, is acceptable only in conjunction with the installation of the low permeability cap. The low permeability cap is not an excessive measure given conditions at the landfill and represents in our opinion the minimum acceptable not only under Part 360 but also the newly promulgated RCRA requirements of 40CFR258, which at a minimum requires that the cap of a landfill be of lower permeability than the material comprising the bottom.

The cost presented for the selected alternative is substantially higher than that proposed by the PRP's. While technical staff question certain estimated quantities, given the accepted range of error in such preliminary estimates (+50% to -30%), there is little basis for argument. Evaluation of the alternatives based on cost is inappropriate since one meets the substantive requirements of the regulations while the other does not even approach the minimum necessary for closure of a municipal landfill absent the presence of hazardous waste.

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File on eDOCs X Yes \_\_\_\_\_ No \_\_\_\_\_  
Site Name Endicott  
Site No. 704008  
County Broom  
Town Endicott  
Foitable X Yes \_\_\_\_\_ No \_\_\_\_\_  
File Name 1992-09-14, Proposed Kennedy  
Scanned & eDOC \_\_\_\_\_