



STATE OF NEW YORK DEPARTMENT OF HEALTH

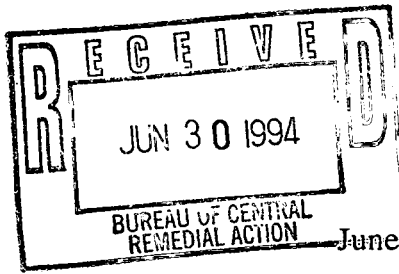
Center for Environmental Health

2 University Place

Albany, New York 12203-3399

Mark R. Chassin, M.D., M.P.P., M.P.H.
Commissioner

Paula Wilson
Executive Deputy Commissioner



OFFICE OF PUBLIC HEALTH

Lloyd F. Novick, M.D., M.P.H.
Director

Diana Jones Ritter
Executive Deputy Director

William N. Stasiuk, P.E., Ph.D.
Center Director

Dear Interested Party:

Enclosed is a copy of the Site Review and Update (SRU) for the Conklin Dumps site. The New York State Department of Health prepared the SRU under a cooperative agreement with the United States Agency for Toxic Substances and Disease Registry. The purpose of the SRU is to evaluate the current conditions of the site and to help determine if additional follow-up public health actions are needed (i.e., public health assessments or health consultations). At this time, the document is final and will not be reissued unless new and substantial information or data are submitted that warrant re-evaluation.

In developing the SRU, technical review comments were solicited from the New York State Department of Environmental Conservation, the United States Environmental Protection Agency, and the Broome County Health Department. Comments from these agencies were considered in finalizing the SRU.

A copy of the SRU is also available for review at the document repository established for the Conklin Dumps site. The document repository also contains other documents and background information related to the site. The document repository for the Conklin Dumps site is:

Conklin Town Hall
1271 Conklin Road
P.O. Box 182
Conklin, NY 13748
(315) 775-1434

If you have any additional questions or concerns regarding this site, please call me at the toll-free number (800) 458-1158, and ask for the operator.

Sincerely,

Susan E. VanPatten
Health Liaison Program
Bureau of Toxic Substance Assessment

Enclosure



Albany, New York 12203-3399

R E C E I V E

JUN 30 1994

**BUREAU OF EASTERN
REMEDIAL ACTION**

William N. Stasiuk, P.E., Ph.D.
Center Director

June 28, 1994

B.E.R.A.		FILE SECTION
FILE NAME	_____	I
FILE CODE	_____	II
NO. SECTIONS	_____	III
NO. ELEMENT	_____	IV
OPERABLE UNIT NO. DESC.	_____	V
DRAFT OR FINAL	_____	VI

Sincerely,
Jessa E. Van Patten

Enclosure



Broome County

ENVIRONMENTAL MANAGEMENT COUNCIL

Broome County Office Building / Government Plaza / Box 1766 / Binghamton, New York 13902 / (607) 778-2116

Claudia E. Stallman, Director

Timothy M. Grippen, County Executive

June 24, 1994

Timothy M. O'Hearn, Supervisor
 Town of Conklin
 PO Box 182
 1271 Conklin Road
 Conklin, NY 13748

RECEIVED
 JUN 30 1994
 DUNN ENGINEERING CO.

RE: LEACHATE FROM TOWN OF CONKLIN LANDFILL

Dear Tim:

This letter is to confirm our phone conversation this morning in which we agreed that representatives from the Town of Conklin would be present at the July 14 EMC General Meeting to give a presentation on the Town's proposal to send leachate from the former Town dump to the Binghamton-Johnson City Joint Sewage Treatment Plant. I have enclosed a meeting notice, which will go out Monday to approximately 50 people on the EMC mailing list.

Brian Davidson The EMC Executive Committee met this morning and concurred with me that this issue should receive attention at the next meeting. Members of the Executive Committee suggested that ~~a representative~~ from the DEC also be present to describe the legal and regulatory parameters associated with leachate disposal from a listed hazardous waste site. Let me know whether this seems like a good idea to you. Who in DEC would be appropriate, in any case?

While I am on vacation next week, please feel free to contact Karen Schatten at 778 2373 if need be. Meanwhile, I look forward to receiving the packet of information we discussed, including the leachate analysis and regulatory limits. Best regards.

Sincerely,

Claudia

Claudia E. Stallman
 Director

CES

cc: Chris Hebdon, Town of Conklin CAC

Post-It™ brand fax transmittal memo 7671		# of pages ▶ 2
To <i>Brian Davidson</i>	From <i>Gay Koria</i>	
Co. <i>DEC</i>	Co. <i>AUST</i>	
Dept. <i>457-1641</i>	Phone # <i>458-1313</i>	
Fax # <i>457-1088</i>	Fax #	



Broome County
ENVIRONMENTAL MANAGEMENT COUNCIL

Broome County Office Building / Government Plaza / Box 1766 / Binghamton, New York 13902 / (607) 778-2116

Claudia E. Stallman, Director

Timothy M. Grippen, County Executive

ENVIRONMENTAL MANAGEMENT COUNCIL
 Meeting to be held on **Thursday, July 14, 1994*** at 7:30 pm
 United Way Building, Board Room
 Corner Jensen Road and Route 434, Vestal, NY

AGENDA

Please BYOC (Bring Your Own Cup) To The Meeting

1. **Approval of Minutes from June Meeting** 7:30 pm
2. **Privilege of the Floor** 7:35 pm
3. **Special Presentation:** 7:40 pm
 Representatives from the Town of Conklin will give a presentation on the Town's proposal to send leachate from the former Town dump to the Binghamton-Johnson City Joint Sewage Treatment Plant. The so-called "Conklin Dumps," which received a small amount of industrial chemical waste in the mid 60s to mid 70s, are on the National Priorities List of hazardous waste dump sites and are being remediated. Mark Gorgos, Town Attorney, and Gary Kerzik, an engineering consultant for the Town with Rust Environmental of Albany, will be present.
4. **Break** 8:10 pm
5. **Committee Reports and Action Items** 8:20 pm
 - Natural Resources Committee
 - **ACTION ITEM:** SEQR Comments (to be distributed at meeting)
 - **ACTION ITEM:** Binghamton University parking letter (enclosed)
 - Solid Waste Committee/Nanticoke Landfill Task Force
 - Ad Hoc Committee on Composting
 - Ad Hoc Committee on Alternative Transportation
6. **Conservation Advisory Commission Reports** 8:55 pm
7. **Staff and Chair's Report** 9:05 pm
 - Monthly announcements
 - Volunteer hours (see form enclosed)
 - Lynne Theophanis distributes draft history of EMC
 - Annual work program review meeting with DEC in Cortland
 - County budget application and State appropriation for EMCs
 - Thanks and congratulations to Anna Schecter who will be leaving us for Dartmouth
 - Other
8. **Member Items of Interest** 9:25 pm
9. **Adjourn** 9:30 pm

- * Please note: This meeting is being held on the second Thursday of July, which is a departure from our regular meeting schedule.





Broome County
ENVIRONMENTAL MANAGEMENT COUNCIL

Broome County Office Building / Government Plaza / Box 1766 / Binghamton, New York 13902 / (607) 778-2116

Claudia E. Stallman, Director

Timothy M. Grippen, County Executive

July 15, 1994

Brian Davidson, NYSDEC
Division of Hazardous Waste Remediation
50 Wolf Rd., Room 224
Albany, NY 12233-7010

RE: LEACHATE DISPOSAL PLAN FOR THE TOWN OF CONKLIN DUMPS

Dear Brian:

As you may know, the Environmental Management Council (EMC) discussed the Town of Conklin's proposal to dispose of leachate from the former Town of Conklin Dumps at its General Meeting held on Thursday, July 14, 1994. At this meeting EMC members raised several questions for the Town of Conklin as well as more technical questions involving the Binghamton-Johnson City Sewage Treatment Plant's capacity, and the loading of heavy metals, among others.

The EMC decided to further discuss these questions at the next meeting of the Natural Resources Committee to be held on Thursday, July 21, 1994 at 4:30 pm. The meeting will be held on the 5th floor of the Broome County Office Building in the Planning Department Conference Room. At this time, the Committee expects to take a position on the issue and subsequently recommend this position to the EMC's Executive Committee for approval.

We hope that all of you will be able to attend. We welcome your varied input and expertise in our deliberations.

Please contact me at (607) 778-2369 to let me if you will be in attendance or if I can be of any further assistance in this matter.

Sincerely yours,

Claudia E. Stallman
Director

cc: Timothy O'Hearn, Supervisor Town of Conklin
Mark Gorgos, Attorney, Town of Conklin
Bill Horrigan, Binghamton-Johnson City Sewage Treatment Plant
Gary Kerzic, Manager, Engineering Services, Rust Environmental

FOILABLE Y-N		B.E.R.A.	FILE SECTION
SITE NAME			I
SITE CODE			II
SUB SECTIONS			III
PRO. ELEMENT			IV
OPERABLE UNIT NO. DES.			V
DRAFT OR FINAL			VI

RECEIVED
JUL 19 1994
BUREAU OF CENTRAL
REMEDIAL ACTION

CES/KAS



Broome County

ENVIRONMENTAL MANAGEMENT COUNCIL

Broome County Office Building / Government Plaza / Box 1766 / Binghamton, New York 13902 / (607) 778-2116

Claudia E. Stallman, Director

Timothy M. Grippen, County Executive

MEMORANDUM

TO: Members, Natural Resource Committee
FROM: Karen A. Schatten, Environmental Analyst *KAS*
DATE: July 15, 1994
RE: **SPECIAL MEETING OF THE NATURAL RESOURCES COMMITTEE**

As you may know, the Environmental Management Council (EMC) discussed the Town of Conklin's proposal to dispose of leachate from the former Town of Conklin Dumps at its General Meeting held on Thursday, July 14, 1994. At this meeting EMC members raised several questions for the Town of Conklin as well as more technical questions involving the Binghamton-Johnson City Sewage Treatment Plant's capacity, and the loading of heavy metals, among others.

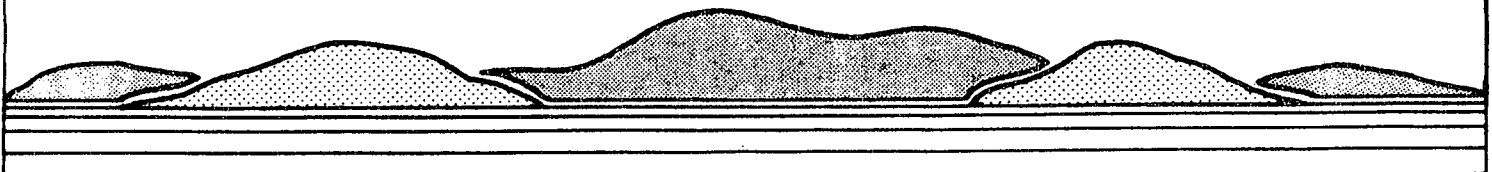
Because this problem requires immediate action, the EMC decided to further discuss these questions at the next meeting of the Natural Resources Committee to be held on Thursday, July 21, 1994 at 4:30 pm. The meeting will be held on the 5th floor of the Broome County Office Building in the Planning Department Conference Room. At this time, the Committee expects to take a position on the issue and subsequently recommend this position to the EMC's Executive Committee for approval.

We hope that all of you will be able to attend. We welcome your varied input and expertise in our deliberations.

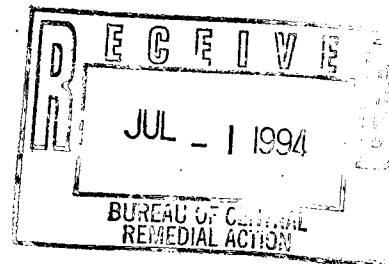
Please contact me at 778-2373 if I can be of any further assistance in this matter.

Hope to see you on July 21!

KAS



June 29, 1994



Ms. Karen Schatten
Broome County Environmental Management Council
Government Plaza
P.O. Box 1766
Binghamton, NY 13902

Re: Conklin Dumps Site
Leachate Disposal

FOR FILE Y-N	B.E.R.A.	FILE SECTION
SITE NAME	_____	I
SITE CODE	_____	II
SUB SECTIONS	_____	III
PRO. ELEMENT	_____	IV
OPERABLE UNIT NO. DESC.	_____	V
DRAFT OR FINAL	_____	VI

Dear Ms. Schatten:

At the request of Timothy O'Hearn, Supervisor, Town of Conklin, (Town) I am providing the Environmental Management Council (EMC) with information relating to the history and remediation of the Conklin Dumps Site. This information is being provided for your consideration in advance of the July 14, 1994 meeting.

The Conklin Dumps Site is located within the Town of Conklin, Broome County, New York. The 37 acre site is situated in a sparsely populated area surrounded by the Broome Corporate Park (Figure 1). The site is owned by the Town of Conklin and consists of two inactive landfill areas designated as the Upper and Lower Landfills. The Lower Landfill was operated by the Town from 1964 to 1969 for the disposal of municipal refuse and is estimated to have received approximately 34,000 cubic yards of fill. The Upper Landfill was operated by the Town from 1969 to 1975 when a closure order was issued by the NYSDEC. This landfill was estimated to contain nearly 72,000 cubic yards of waste material.

O'Brien and Gere Engineers, Inc. initiated a two phase hydrogeologic investigation, in 1984, of the then proposed location for the Broome Corporate Park. The purpose of the investigation was to determine the feasibility of developing the area as a corporate park. The first phase evaluate the potential for contamination and limitations to developing the area. This was completed in March 1984. The second phase was completed in February 1985, and characterized the local hydrogeology and identified hydrogeologic conditions relevant to the development of the park. This investigation identified leachate seeps and the presence of low levels of contaminants in groundwater in the vicinity of the landfill.

Ms. Karen Schatten

June 29, 1994

Page Two

A work plan for performing a remedial investigation and feasibility study (RI/FS) was submitted to the NYSDEC in 1985. The Conklin Dumps Site was proposed for inclusion on the National Priorities List of Inactive Hazardous Waste Sites in June 1986, and accepted for listing on March 30, 1989, at a Hazard Ranking System (HRS) score of 33.93 and a ranking of 774. Field investigations for the RI were undertaken from January to June 1986. The completion of the RI report was delayed due to the enactment of the Superfund Amendments and Reauthorization Act (SARA) in October, 1986, which imposed additional activities to the scope of the RI. The RI report was completed in December 1988, and approved by the NYSDEC on February 12, 1990, contingent upon the inclusion of additional groundwater sampling to obtain validated data at critical locations, methane monitoring, and field delineation of wetlands in the vicinity of the Lower Landfill. This additional sampling was completed in June 1990, and showed the presence of volatile organics and selected metals, primarily downgradient of the Upper Landfill. Only inorganics were found downgradient of the Lower Landfill. Leachate samples from both landfills showed detectable levels of volatile organic and inorganic compounds.

Contaminants detected in the groundwater and leachate were found to exceed New York State Class GA Groundwater Standards. Chloroethane, 1, 2-Dichloropropane, and Xylene have been detected in samples collected at the Upper Landfill, at levels exceeding Class GA standards. Xylene has been detected historically at levels slightly above to slightly below the Class GA standard of 5 parts per billion (ppb). Similarly 1, 2-Dichloropropane has been found above the Class GA standard of 5 ppb, but concentrations have been decreasing over the last six years to a level equalling or slightly under the standard. Chloroethane was found at the highest level (68 ppb) and is considered to be the major contaminant of concern. All surface water samples collected from Carlin Creek, which flows adjacent to the Upper Landfill, contained no detectable levels of contamination.

A baseline or no-action health risk assessment was performed for the RI to determine potential risks to human health and the environment associated with present site conditions. This assessment characterized potential exposure pathways and also quantified potential carcinogenic and non-carcinogenic risk.

Three exposure pathways were identified as being complete or potentially complete. These pathways were: human ingestion of contaminated water; direct human contact with landfill waste; and surface water and sediment pathway for benthic organisms in wetlands adjacent to the Lower Landfill. Although the quantitative estimation of current potential health risks were within the acceptable range for the three exposure pathways, state and federal groundwater standards are currently being exceeded. EPA and the State of New York have determined that the actual as well as the threatened releases of hazardous substances from the Site, if not addressed by remedial action, may present a current or potential threat to public

health, welfare, or the environment, and that remedial action is therefore required.

Following the completion of the RI, a feasibility study (FS) was undertaken to develop and evaluate remedial action alternatives for the site. This resulted in a March 1991 Record of Decision (ROD) for the Conklin Dumps site calling for, among other things, the capping of the Upper Landfill and the Lower Landfill place and leachate collection and treatment.

During preliminary design activities associated with the selected remedy, it was determined that the construction of a leachate collection trench and cap at the Lower Landfill would present significant engineering difficulties due to the proximity of an adjacent wetland and railroad tracks. In order to eliminate the leachate seeps at the Lower Landfill, it would be necessary to install a leachate-collection system below the water table. A leachate-collection system installed below the water table, however, would collect vast amounts of uncontaminated groundwater and could adversely impact the adjacent wetland by dewatering a portion of it, unless hydraulic barriers are installed (which in itself could adversely impact the wetland). In addition, installing a cap on the Lower Landfill could negatively impact the adjacent wetland in that it would encroach on the wetland. Due to these technical feasibility and environmental concerns, a modified remedy consisting of the excavation of the Lower Landfill, consolidation of the excavated Lower Landfill contents onto the Upper Landfill, capping of the Upper Landfill, and construction of a leachate collection and treatment system was approved by the EPA and NYSDEC.

The evaluations performed by the consulting firm that prepared the feasibility study, on which the ROD was based, concluded that the on-site treatment system would consist of an air stripper to remove low levels of volatile organic compounds (VOC). Based on samples of leachate collected, a greater concern for on-site treatment are the high levels of iron, suspended solids and Biological Oxygen Demand (BOD) in the untreated leachate. These parameters would not only be untreatable by an air stripper but would also have a detrimental effect on the operation of the air stripper and its ability to effectively remove the VOCs.

The ROD anticipated that Carlin Creek would be the discharge point for the on-site treatment option. Carlin Creek is an intermittent stream which cannot readily assimilate or dilute any discharge and, therefore, is very susceptible to environmental degradation. For this reason, effluent limitations are set very low. Discharge directly to the Suquehanna River is not practical, as the river is approximately 2,000 feet from the site. The treated effluent would have to be piped under two major roads, a railroad track, and across a designated wetland and privately owned property to reach the river.

The treatment process necessary to approach effluent limitations for discharge to Carlin Creek would consist of biological treatment (i.e., extended aeration), chemical addition/precipitation, both primary filtration and secondary clarification, and possibly chlorination/dechlorination

Ms. Karen Schatten
June 29, 1994
Page Four

prior to discharge. The on-site treatment option would force the Town of Conklin to essentially construct a scaled down version of the Binghamton-Johnson City Joint Sewage Treatment Plant approximately 30 feet away from the Binghamton-Johnson City sewerline.

An added significant concern is the level of complexity for the operation and maintenance of an on-site system. Though an on-site treatment system would be designed to operate automatically, chemical feed systems would require replenishment and sludge generated would require off-site disposal. These activities would require a level of effort and complexity for which the Town currently lacks the man-power and expertise.

Treatability studies performed for the Feasibility Study indicate that leachate from the site is readily treatable at the Binghamton-Johnson City Joint Sewage Treatment Facility and would not adversely effect the treatment plant processes. The Binghamton-Johnson City Joint Sewage Treatment Facility is designed to remove BOD and solids, the very parameters which would be difficult to treat in an on-site treatment plant, and the Town of Conklin has committed to meet any pre-treatment requirements.

Conklin officials have met with the Binghamton-Johnson City Joint Sewage Board on several occasions to discuss the issue of direct discharge of leachate to the sewer system. The Board has recently informed the Town that their primary concern is one of public perception and their ability to dispose of sludge from the treatment plant. To address the concern over perception, the Town has collected samples of leachate over the last three years for analysis of various parameters. Enclosed is a copy of the analytical data for your review and evaluation. The following is a summary of the analysis of samples collected during 1993 and 1994. These results indicate that the leachate is far less innocuous than typical leachate from solid waste landfill or typical domestic sanitary sewage.

March 29, 1994

January 28, 1993

Volatile Organic Compounds (ug/l)

Total Xylenes	ND	150
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Semi-Volatile Organic Compounds (ug/l)

4-Chloro-3-Methylphenol	ND	18
1, 4-Dichlorobenzene	ND	9
Diethyl Phthalate	ND	48
Bis (2-ethylhexyl) Phthalate	ND	6

Ms. Karen Schatten
June 29, 1994
Page Five

March 29, 1994

January 28, 1993

PCB/Pesticides

All Parameters

ND

ND

Metals (ug/l)

Arsenic	32.1	4.0
Barium	297	ND
Chromium	42.9	ND
Cooper	57.8	ND
Lead	51.9	1.4
Iron	Not Analyzed	130,000
Nickel	67.0	ND
Zinc	273	140

Miscellaneous Parameters (mg/l)

Ammonia-Nitrogen	2.88	33
BOD (5 day)	70	15
COD	28.4	180
pH	7.11	6.2
Phenols	0.066	ND
Phosphorus	1.17	0.12
Total Dissolved Solids	288	830
Total Suspended Solids	14,600	200

The result of the analyses samples collected on both of these dates indicates non-detectable or low level detectable results for all other parameters.

The Town of Conklin has been notified by the NYSDEC that they are currently in violation of a 1987 Consent Order with the NYSDEC and stipulations of the March 1991 Record of Decision. This violation has occurred because the Town has not been able to obtain permission from the Sewer Board to discharge leachate into the on-site sewerline for treatment at the Binghamton-Johnson City Joint Sewage Treatment Plant, nor has the Town provided any other environmentally acceptable method of leachate treatment. This situation is unacceptable, and requires an expeditious resolution by the Town of Conklin.

The Sewer Board has indicated that if concerns over public perception can be allayed by gaining the approval and support of the EMC, the only impediment toward their treatment of

Ms. Karen Schatten
June 29, 1994
Page Six

the leachate would be removed. Therefore, the Town is requesting the EMC's serious consideration of this matter.

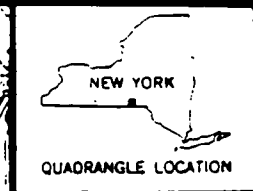
I look forward to meeting you and the other members of the EMC at your July 14 meeting. If you require any further information, please do not hesitate to contact me.

Very truly yours,

Gary T. Kerzic, P.E.
Manager, Engineering Services

GTK/kas

cc: Robert Denz - Broome Co. DOH
Timothy O'Hearn
Mark Gorgos
Brian Davidson



NEW YORK
QUADRANGLE LOCATION

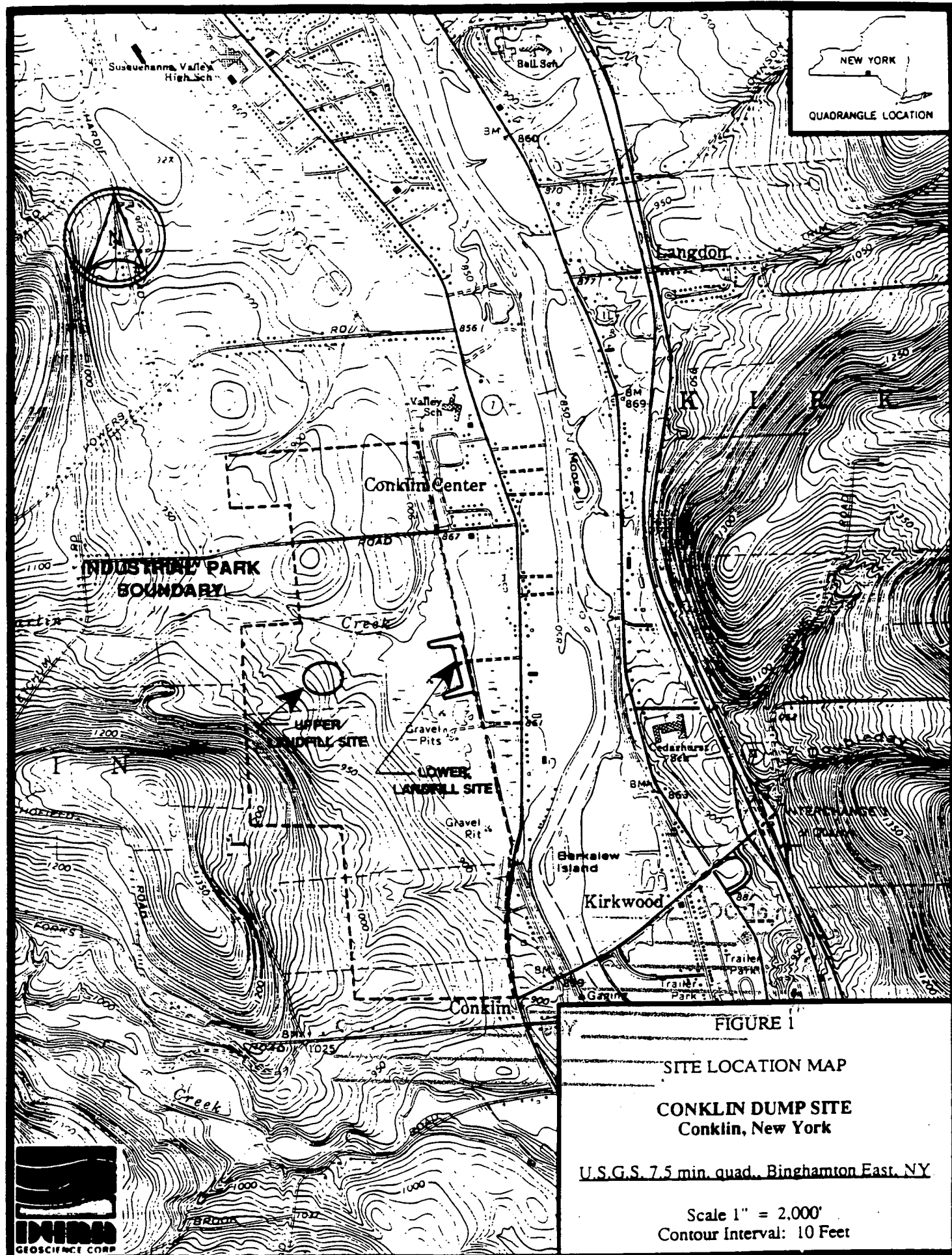


FIGURE 1

SITE LOCATION MAP

CONKLIN DUMP SITE
Conklin, New York

U.S.G.S. 7.5 min. quad., Binghamton East, NY

Scale 1" = 2,000'
Contour Interval: 10 Feet



File on eDOCs _____ Yes _____ No
Site Name _____
Site No. _____
County _____
Town _____
Foitable _____ Yes _____ No
File Name _____
Scanned & eDOC _____

DUNN ENGINEERING COMPANY

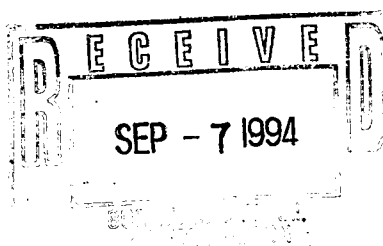
Environmental, Civil and Geotechnical Engineers
12 Metro Park Road
Albany, NY 12205
Tel: 518/458-1315
Fax: 518/458-2472



September 1, 1994

FIRST CLASS MAIL

Mr. William Horrigan, Jr.
Superintendent
Binghamton-Johnson City Joint Sewage Board
Old Vestal Road
Vestal, New York 13850



Dear Mr. Horrigan:

Subject: Conklin Landfill Leachate

Timothy O'Hearn, Supervisor, Town of Conklin has requested that I provide this letter to you regarding proposed pretreatment of leachate from the Conklin landfill, prior to discharge to the Binghamton-Johnson City Sewage Treatment Plant.

My first preference would be to propose discharge of the leachate with no pretreatment, but based on discussions at our previous meetings, iron and suspended solids appear to be a concern of yours. With this in mind, we would propose to pump the leachate collected to an on-site storage tank where it would be held for two to three days to allow for settling of suspended solids. Initially, samples would be collected of each tank volume (assume 30,000 gallons) for the first two weeks, after which we would change to one sample per month. Samples would be analyzed for total suspended solids, iron, and volatile organic compounds. Previous analyses of samples taken from monitoring wells indicates that iron concentrations are directly related to suspended solids levels. A filtration system would be provided consisting of a series of bag filters placed on the effluent line from the storage tank. If total suspended solids concentrations exceed 200 mg/l, the leachate would be filtered prior to discharge to the sewer system. This would reduce not only the concentration of suspended solids, but also the concentration of iron. Sampling results have indicated that volatile organic compounds (VOC) are not present or are present at low part per billion levels. If monitoring indicates a significant long-term increase in VOC levels, an aeration system would be retrofitted with the filters.

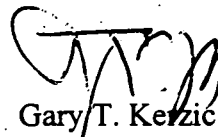
FOILABLE Y-N	B.E.R.A.	FILE SECTION
SITE NAME	_____	I
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DRAFT OR FINAL	_____	VI

Mr. William Horrigan
Page 2
September 1, 1994

The Town of Conklin is willing and anxious to satisfy the concerns of the Joint Sewage Board relating to this issue. If this conceptual plan for pretreatment of the leachate is not satisfactory, please do not hesitate to call me with your concerns.

Sincerely,

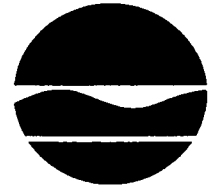
Dunn Engineering Company



Gary T. Kerzic, P.E.
Manager, Engineering Services

cc: Timothy O'Hearn
Mark Gorgos
Brian Davidson

New York State Department of Environmental Conservation
50 Wolf Road, Albany, New York 12233-7010



MAY 10 1994

Langdon Marsh
Acting Commissioner

Mr. Robert Hogan
Chairman, Joint Sewage Board
36 Chrisfield Ave.
Johnson City, New York 13790

Dear Mr. Hogan:

In March 1991, the United States Environmental Protection Agency (USEPA) issued a Record of Decision (ROD) for the Conklin Landfills Site. The remedial alternative specified in the ROD included the installation of a low permeability landfill cover with leachate collection. The leachate was to be either treated on-site or discharged to the sanitary sewer system for treatment at the Binghamton-Johnson City Sewage Treatment Facility.

The evaluations performed by the consulting firm that prepared the feasibility study, on which the ROD was based, concluded that the on-site treatment system would consist of an air stripper to remove low levels of volatile organic compounds (VOC). Based on samples of leachate collected, a greater concern for on-site treatment are the high levels of iron, suspended solids and Biological Oxygen Demand (BOD) in the untreated leachate. These parameters would not only be untreatable by an air stripper but would also have a detrimental effect on the operation of the air stripper and its ability to effectively remove the VOCs.

The ROD anticipated that Carlin Creek would be the discharge point for the on-site treatment option. Carlin Creek is an intermittent stream which cannot readily assimilate or dilute any discharge and, therefore, is very susceptible to environmental degradation. For this reason, effluent limitations are set very low. Discharge directly to the Susquehanna River is not practical, as the river is approximately 2000 feet from the site. The treated effluent would have to be piped under two major roads, a railroad track, and across a designated wetland and privately owned property to reach the river.

The treatment process necessary to approach effluent limitations for discharge to Carlin Creek would consist of biological treatment (i.e., extended aeration), chemical addition/precipitation, both primary filtration and secondary clarification, and possibly chlorination/dechlorination prior to discharge. The on-site treatment option would force the Town of Conklin to essentially construct a scaled down version of the Binghamton-Johnson City Sewage Treatment Plant approximately 30 feet away from the Binghamton-Johnson City sewerline.

An added significant concern is the level of complexity for the operation and maintenance of an on-site system. Though an on-site treatment system would be designed to operate automatically, chemical feed systems would require replenishment and sludge generated would require off-site disposal. These activities would require a level of effort and complexity for which the Town currently lacks the man-power and expertise.

Treatability studies performed for the Feasibility Study indicate that leachate from the site is readily treatable at the Binghamton-Johnson City Sewage Treatment Facility and would not adversely effect the treatment plant processes. The Binghamton-Johnson City Sewage Treatment Facility is designed to remove BOD and solids, the very parameters which would be difficult to treat in an on-site treatment plant, and the Town of Conklin has committed to meet any pre-treatment requirements.

Should the Sewer Board agree to accept the discharge from the site, the Town of Conklin could be considered a significant industrial user (SIU). The discharge rate is anticipated to be 4 or 5 gpm for the first year and approximately .5 gpm thereafter.

As stated in the enclosed January 4, 1991 correspondence from Mr. Brian Davidson, of my staff, to Mr. William Horrigan, the New York State Department of Health, the United States Environmental Protection Agency and this Department concurred that discharge to the on-site sanitary sewerline and treatment at the Binghamton-Johnson City Joint Sewage Treatment Plant, assuming that the discharge meets pretreatment requirements, is the preferred alternative.

The Town of Conklin has been notified by this Department that they are currently in violation of a 1987 Consent Order with this Department and stipulations of the March 1991 Record of Decision. This violation has occurred because the Town has not been able to obtain permission from the Sewer Board to discharge leachate into the on-site sewerline for treatment at the Binghamton-Johnson City Joint Sewage Treatment Plant, nor has the Town provided any other environmentally acceptable method of leachate treatment. This situation is unacceptable, and requires an expeditious resolution by the Town of Conklin.

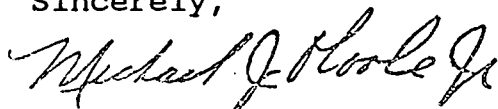
In order to help resolve this situation, I urge the Sewer Board to render a decision on this matter. In addition to any operational effects, I trust the Board will consider cost effectiveness, environmental and economic impacts to surrounding communities and the region.

Mr. Robert Hogan

Page 3

Thank you for your consideration and assistance in helping to resolve this matter. If this Department could provide your Board with any additional information on the Conklin Landfill site, please contact Mr. Brian H. Davidson, of my staff, at 518-457-1641.

Sincerely,

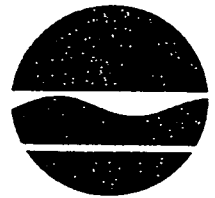


Michael J. O'Toole, Jr.
Director
Division of Hazardous Waste
Remediation

enclosure

cc: Members of the Board
M. Gorgos, Coughlin and Gerhart
T. O'Hearn, Town of Conklin

New York State Department of Environmental Conservation
50 Wolf Road, Albany, New York 12233 - 7010



Thomas C. Jorling
Commissioner

JAN 04 1991

Mr. William Horrigan
Plant Operator
Binghamton-Johnson City Joint
Sewage Treatment Plant
Old Vestal Road
Binghamton, New York 13903

Dear Mr. Horrigan:

RE: Conklin Landfills
Site No. 704013

The New York State Department of Health (NYSDOH), the United States Environmental Protection Agency (USEPA) and this Department have reviewed alternatives for treatment and discharge of leachate from the Conklin Landfills site located south of Powers Road, approximately one mile north of the Kirkwood Interchange of Interstate Route 81. The NYSDOH, USEPA and this Department concur that discharge to the on-site sanitary sewer line and treatment at the Binghamton-Johnson City Joint Sewage Treatment Plant is the preferred alternative, assuming that it meets pretreatment requirements. There are no State or Federal regulatory impediments to this alternative.

If I could provide you with any assistance on this matter, or if you have any questions or would like additional information, please do not hesitate to contact me at 518-457-1641.

Sincerely,

Brian H. Davidson
Project Manager
Bureau of Central Remedial Action
Division of Hazardous Waste
Remediation

cc: P. Fox
M. Gorgos
P. Marks

File on eDOCs X Yes _____ No _____
Site Name Corklin
Site No. 204013
County Broome
Town Corklin
Foilable X Yes _____ No _____
File Name 1994-06-30, Leachate Plan
Scanned & eDOC _____