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PRELIMINARY
RCRA FACILITY ASSESSMENT
INDUSTRIAL SERVICE CORPORATION
ELMIRA, NEW YORK
Work Assignment: R02040
(Ref. No. 1-635-393)

Prepared for:
U.S. Environmental Protection Agency

Contract: 68-W9-0003

TRC

TRC Environmental Corporation

TRC formerly Alliance Technologies Corporation
TRC Environmental Corporation

291 Broadway, Suite 1206
New York, NY 10007
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November 1, 1993

Elizabeth Van Rabenswaay
Regional Project Officer
U.S. Environmental Protection Agency
Air and Waste Management Branch
26 Federal Plaza, Room 1006
New York, New York 10278

Reference: Contract No. 68-W9-003, TES-6
Work Assignment No. R02040
Multi Sites Preliminary RFAs
(Ref. No. 1-635-393)

Subject: Deliverable: Preliminary RCRA Facility Assessment for Industrial Service Corporation, EPA ID No. NYD002221430

Dear Liz,

In accordance with the reporting requirements of the subject Work Assignment, enclosed are three bound copies and one unbound copy of the Preliminary RCRA Facility Assessment Report for the Industrial Service Corporation facility (EPA ID No. NYD002221430).

Questions concerning this submission should be directed to the TRC Project Manager, Michael F. Clark, P.E. or the undersigned at (212) 349-4616.

Sincerely Yours,

Douglas Sullivan
Regional Manager

cc: John Nevius/EPA Work Assignment Manager
David Boyd/EPA TES-6 Contracting Officer
Michael F. Clark/TRC Project Manager
TES ZPMO (letter only)

PRELIMINARY RCRA FACILITY ASSESSMENT
INDUSTRIAL SERVICE CORPORATION
ELMIRA, NEW YORK

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Air and Waste Management Division
26 Federal Plaza
New York, New York 10278

Work Assignment No.:	R02040
EPA Region:	II
EPA Site/Facility I.D. No.:	NYD002221430
Contract No.:	68-W9-0003 (TES-6)
TRC Document No.:	NY-R40.R12
TRC Project No.:	1-635-393-3-2000-0
TRC Project Manager:	Michael F. Clark, P.E.
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Subcontractor No.:	N/A
Subcontractor Project Manager:	N/A
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Telephone No.:	(212) 264-9578
Date Prepared:	November 1, 1993

TRC ENVIRONMENTAL CORPORATION
291 Broadway, Suite 1206
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1.0 INTRODUCTION

TRC Environmental Corporation (TRC - formerly Alliance Technologies Corporation) was requested by the U.S. Environmental Agency (EPA) under EPA Contract No. 68-W9-0003 (TES-6), Work Assignment No. R02040, to perform a Preliminary RCRA Facility Assessment (RFA) of the Industrial Service Corporation (ISC) facility in Elmira, New York (EPA I.D. No. NYD002221430). Tasks were performed in accordance with the Preliminary RFA Scope of Work provided by EPA on June 8, 1993, and TRC's EPA-approved Work Plan, dated July 14, 1993.

The purpose of the Preliminary RFA is to identify, gather information on, and evaluate the potential for releases to the environment from areas of concern (AOCs), including solid waste management units (SWMUs), hazardous waste management units (HWMUs), and areas where releases may have occurred in the past. In addition, the Preliminary RFA will provide information for EPA use in the ranking of this facility using the National Corrective Action Prioritization System (NCAPS).

Background information for this Preliminary RFA Report was obtained through file searches conducted at the New York State Department of Environmental Conservation (NYSDEC), Albany, New York, Bureau of Hazardous Waste Facility Compliance, Bureau of Wastewater Facilities Design, and the Bureau of Air Application, Review and Permitting.

Facility files were reviewed while conducting the Visual Site Inspection (VSI) of ISC on September 20, 1993 (TRC, 1993).

2.0 FACILITY DESCRIPTION

ISC is located at 926 Stowell Street in Elmira, Chemung County, New York. The Site Location Map is included as Figure 1. The facility is bordered by light industrial and residential areas. A junk yard and rail yard are located to the northeast. Newton Creek is approximately 3,600 feet to the northeast, and the Chemung River is approximately 5,000 feet to the south. The facility is mostly surrounded by a chain linked fence, and the majority is covered with asphalt. The property is generally level (TRC, 1993). The block and lot number is 89.11-1-25.

TRC conducted a VSI of the ISC facility on September 20, 1993 (TRC, 1993). Information provided in this section is based on the contents of NYSDEC's files, observations noted during the VSI, and information provided by John Morgan, President of ISC. The majority of pertinent information referenced by TRC is in ISC's *Corrective Action Prior To Loss Of Interim Status Inspection (ATK, DPRA, 1989)* and *Closure Certification Report (VSCE, 1989).*

The facility consists of a two-story manufacturing building. The Site Location Map is presented as Figure 1. Additional figures provided in Appendix A illustrate the layout of the facility.

Eight (8) AOCs were identified in the files reviewed by TRC. Table 1 outlines the AOCs at ISC.

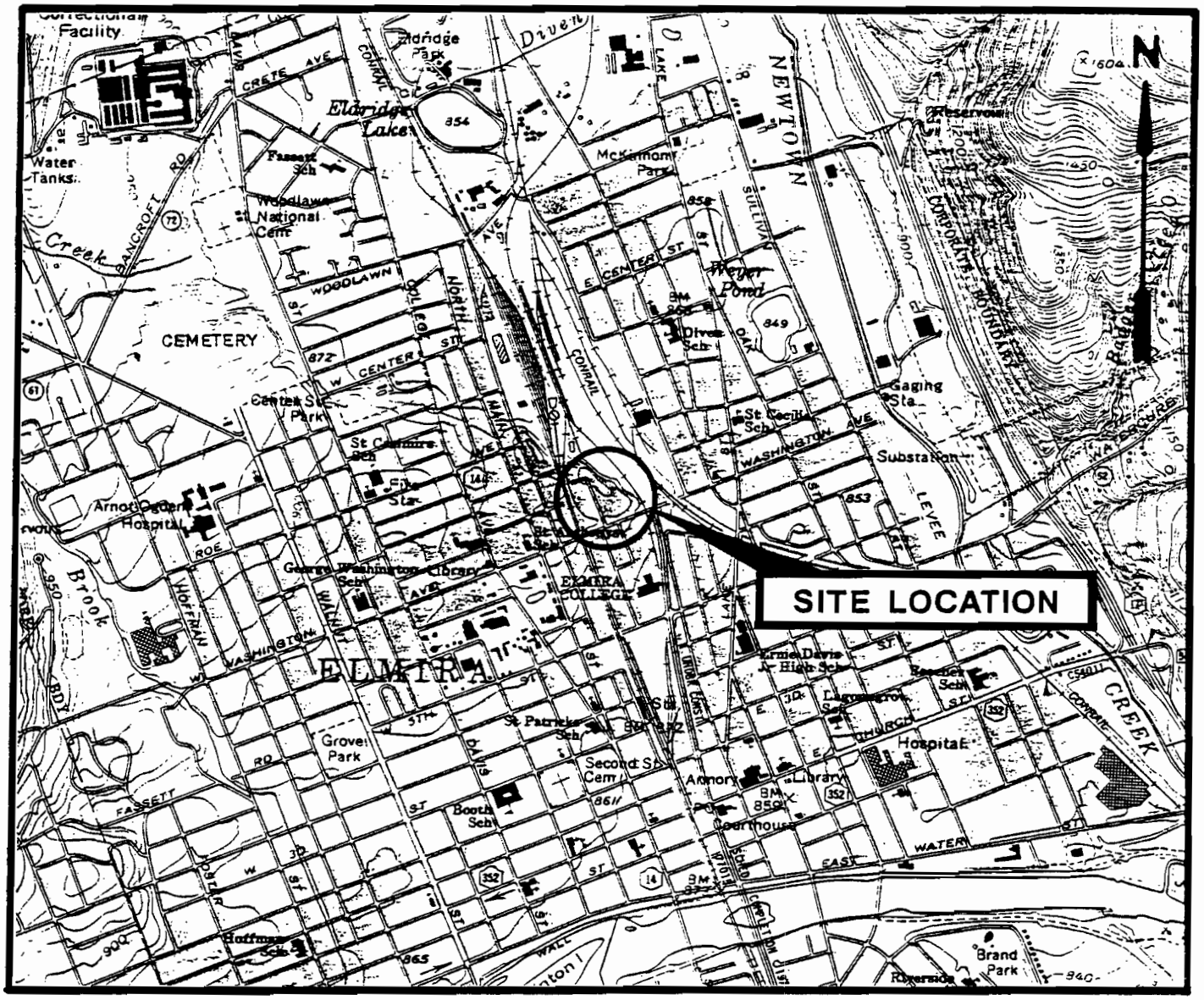
AOC #1 is an accumulation area for process wastes. The concrete floor is approximately 70 square feet in size. Brown staining and a small puddle of unknown liquid were observed on the floor during the VSI. Metal hydroxides in the form of sludge cake (F008) are stored in "tea packs" on wooden pallets. Tea packs are cardboard boxes measuring approximately three feet by three feet by three feet that are lined with thick plastic sheeting. The sludge is comprised primarily of iron, in addition to smaller quantities of other metals in the hydroxide form. The sludge is transported off site by a licensed hauler to an approved transfer, storage, and disposal facility (TSDF) (TRC, 1993). AOC #1 is classified as a less-than-90-day storage area (TRC, 1993).

AOC #2 is a former 600-gallon above-ground storage tank (AST) located in an asphalt parking lot across Stowell Street. The tank was constructed with steel and used for the storage of corrosive waste (D001). The asphalt surface at this location was reportedly of poor structural integrity. In March 1987, this tank was moved inside, and the corrosive sludge was mixed with water and used in the neutralization process (ATK, DPRA, 1989). In March 1989, this SWMU was certified closed (NYSDEC, 1989a). The tank is no longer located at the facility (TRC, 1993).

AOC #3 is a former outdoor waste storage tank. The results of the 1982 NYSDEC inspection stated that a 400 to 500-gallon AST containing cyanide waste was covered with plywood and located at the edge of a steep hill (ATK, DPRA, 1989). The steep hill is located at the junk yard property boundary. The area adjacent to the top of the hill is presently paved. A closure plan was not submitted for this area. The structure of the tank and details of its removal were not documented in the available files. The tank is no longer located at the facility (TRC, 1993).

AOC #4 is a former roll-off box used for the storage of electroplating sludge (F008) generated from the wastewater pretreatment system. It was located on an asphalt pad and covered with a tarp when it was not in use. Sludge was stored here for less than 90 days (ATK, DPRA, 1989), and then transported off-site by a licensed hauler to an approved TSDF. The roll-off box is no longer located at the facility (TRC, 1993).

AOC #5 is a 30-gallon stainless steel tank used to contain runoff and spills on the second floor of the building. The tank is located beneath floor and protected by a metal grate. The tank is connected directly to the wastewater pretreatment system. Wastes collected here include black oxide, rinse water, and water from cleaning tanks (TRC, 1993).



SCALE 1:24000

1 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 .5 0 1 KILOMETER

QUADRANGLE LOCATION

SOURCE: USGS 7.5 MINUTE TOPOGRAPHIC MAP QUADRANGLE, ELMIRA, N.Y.

TRC Environmental Corporation
18 Worlds Fair Drive
Somerset, N.J. 08873

INDUSTRIAL SERVICE CORPORATION
926 STOWELL STREET
ELMIRA, N.Y.

SITE LOCATION MAP

Date: 9-10-93	Proj.# 1-635-393	Fig. 1

WORK ASSIGNMENT NO. R02040

TABLE 1. AREAS OF CONCERN						
Area of Concern (AOC)	**AOC Description**	**Operation Dates**	**Release Status**	**Reference**	**Medium/ Compounds Detected**	**Off-Site Migration Potential**
#1 Accumulation Area	Concrete floor 70 square foot area interior location	1981/Present	Documented Release	ATK, DPRA, 1989. TRC, 1993.	Unspecified/94ppm cyanide chip sample: 6.9 ppm cadmium, 120 ppm lead.	Low
#2 600-Gallon Tank	AST located in outside asphalt parking lot prior to 1987. Located inside the building prior to 1989	unknown/1989	Suspected Release	ATK, DPRA, 1989.	Chip sample from exterior of tank: 32 ppm arsenic, 3.8 ppm barium, 39ppm cadmium, 27 ppm chromium-t, 14,800 ppm lead, 13 ppm mercury	Unknown
#3 Outdoor Waste Storage Tank	AST located outside at the top of a steep hill located at the junk yard property line.	Unknown/ Around 1983 Never officially closed.	Potential Release	ATK, DPRA, 1989.	Unknown	Unknown
4# Roll-off Box	Located outdoors on an asphalt pad. Stored electroplating waste sludge (F008).	Unknown/ Around 1992	No Release	ATK, DPRA, 1989.	Unknown	Low
#5 Spill Tank	30-gallon stainless steel Polypropylene tank to contain spills in the upper level plating area. Modified in 1990 to contain runoff.	1988/Present	No Release	ATK, DPRA, 1989. TRC, 1993.	Unknown	Low
#6 Receiving Basin	Received waste water from the parts tumbler and discharged to the sanitary sewer.	Unknown/ Around 1987	Suspected Release	ATK, DPRA, 1989. TRC,1993.	Elevated levels of Cadmium detected. Quantity and type of samples was not specified.	High
#7 Wastewater Pretreatment Plant	System used to pretreat waste waters generated from the electroplating process.	1984/Present	Documented Release	ATK, DPRA, 1989. TRC, 1993.	12 ppm of cyanide was detected on the stairway to the lower level. Quantity and type of samples was not specified.	High

TABLE 1. AREAS OF CONCERN						
Area of Concern (AOC)	**AOC Description**	**Start-up/Closure Dates**	**Release Status**	**Reference**	**Medium/ Compounds Detected**	**Off-Site Migration Potential**
#8 Chemical Storage House	Concrete Floor used for the storage of virgin chemicals	Unknown/Present	No Release	TRC, 1993	Unknown	Low

AOC #6 is a former receiving basin located at the edge of the loading dock on the second floor. It is constructed with concrete and the approximate dimensions are 2 feet by 3 feet. Prior to 1989 it received rinse water from the parts tumbler and discharged it to the sanitary sewer. Presently, this area is sealed with concrete (TRC, 1993). The depth of the receiving basin was not documented in the files reviewed, and could not be determined during the VSI.

AOC #7 is a pretreatment plant for wastewater generated from the electroplating process. Process steps include the following: a basement sump, a main sump, a cyanide oxidation unit, a holding tank, electrochemical cells, a degassing tank, a clarifier, a filter press, a filter press hopper, and a secondary sump. The plant treats approximately 30,000 gallons of wastewater per day and generates 3.8 tons of metal hydroxide sludge per month. A system of floor drains is present to ensure that all spills are contained and directed to the pretreatment plant. An atomic adsorption is also used to continually monitor the effluent (TRC, 1993).

AOC #8 is a chemical storage house for virgin products used in the electroplating process. Chemicals stored at this location include: hydrochloric acid, sodium hydroxide, black oxide, nickel solution, and copper solution. The concrete floor is L-shaped with each arm measuring approximately 20 feet by 8 feet. The drums are situated on metal grates and supported by a concrete berm for containment (TRC, 1993).

It should be noted that all areas within the manufacturing building contain floor drains for spill containment. The drains are connected to the pretreatment plant (TRC, 1993).

3.0 FACILITY ACTIVITY/HISTORY

ISC has occupied the facility since 1945 (ATK, DPRA, 1989). Previous history of the site was not documented in the files reviewed. All operations are conducted in the main building.

The ISC facility is a small electroplating shop that manufactures steel and aluminum products such as screws, bolts, and fasteners. The process requires the use of acid and alkaline baths including sulfuric acid, hydrochloric acid, and sodium hydroxide (ATK, DPRA, 1989). Manufacturing operations include cleaning, plating, and polishing processes. Zinc plating and anodizing make up 80% of ISC's business. The anodizing process involves the application of aluminum oxide coating to metal surfaces through the use of sulfuric acid. Black oxide, copper, and nickel plating, in addition to phosphating, make up the remainder of their overall business. ISC is presently in operation (TRC, 1993).

ISC submitted a formal request for reclassification as a generator-only in October 1983, stating that as of March 1983, all waste was removed within 90 days of generation (NYSDEC, 1983). NYSDEC approval was granted for the Closure Plan

and Public Notice on February 3, 1989 (NYSDEC, 1989c). The closure was performed by ISC and overseen by Vernon O. Shumaker Consulting Engineers (VSCE) of Vestal, New York. Closure activities commenced on May 12, 1989, and were completed on May 16, 1989 (VSCE, 1989). NYSDEC considered ISC's SWMUs to be officially closed November 3, 1989 (NYSDEC, 1989a). The Closure Report indicated elevated levels of lead in the accumulation area and on the exterior of the 600-gallon tank. Cadmium was also detected at both locations. Arsenic, barium, trivalent chromium, and mercury were detected on the exterior of the 600-gallon storage tank. (The analytical results obtained during closure are presented in Appendix B).

In February, 1989, A.T. Kearney and DPRA Incorporated (ATK-DPRA) were contracted by EPA to conduct a Corrective Action Prior to Loss of Interim Status Inspection (CAPT LOIS) at the ISC facility

ATK, DPRA identified an accumulation area (AOC #1) for electroplating (F008) sludge and spent stripping solution (D002). ISC was cited for storing wastes in excess of 90 days in this area by NYSDEC in 1983 and 1986. During a 1987 inspection conducted by the NYSDEC, a sample indicated the presence of 94 parts per million (ppm) of cyanide at this location. A drum of cyanide waste was also observed leaking in the accumulation area during the same inspection; however, a description of the collected sample is not specified. ATK, DPRA did not indicate a need for further investigation (ATK, DPRA, 1989). Closure was performed in March 1989, and a chip sample indicated a lead concentration of 120 ppm (VSCE,1989) (see Appendix B). The Closure Certification of the storage area was approved by the NYSDEC November 3, 1989 (NYSDEC, 1989a). The VSI indicated that this area is still active as a less-than-90-day storage area for F008 (electroplating sludge) stored in "tea packs" (TRC, 1993).

ATK, DPRA identified a 600-gallon tank (AOC #2) used for the storage of corrosive waste (D002). This tank was formerly located in an asphalt parking lot across Stowell Street, before it was relocated inside the manufacturing building in 1987. The surface of the parking lot was reportedly of poor integrity. The results of the 1982 NYSDEC inspection identified a 600-gallon tank containing phosphoric acid was located outside with asphalt shingles covering it. A 1987 NYSDEC inspection cited ISC for storing waste with a pH of approximately 1.0 in the 600-gallon tank. After 1987, the tank was moved inside, and six to eight inches of corrosive (D002) sludge was mixed with water and used to neutralize the wastewater. On June 23, 1988, a NYSDEC inspection cited ISC for storing waste in this tank for an excess of 90 days and requested its closure. ATK, DPRA recommended that soil samples be obtained at the outdoor location if it was determined that the waste in the tank contained excessive levels of heavy metals or volatile organics (ATK, DPRA, 1989). During the closure, a chip sample taken from the exterior of the tank indicated a lead concentration 14,000 ppm (see Appendix B), in addition to lower levels of chromium, cadmium, and arsenic (VSCE, 1989). The Closure Certification was approved by the NYSDEC November 3,

1989 (NYSDEC, 1989a). No information was obtained during TRC's file review to document that the waste was sampled. The VSI indicated that the tank has been removed. According to the President of ISC, NYSDEC had sampled surface soil in the past, but the facility has never had an environmental investigation conducted on its own. Evidence of staining or distressed vegetation was not observed (TRC, 1993).

ATK, DPRA reported an outdoor waste storage tank (AOC #3) used for the storage of cyanide waste. A 1982 NYSDEC inspection cited a 400-500 gallon tank containing cyanide waste which was covered with a piece of plywood and was located at the edge of a steep hill. In February 1983, a Consent Agreement and Final Order was issued requiring ISC to store the tank in a manner that ensured structural integrity. ATK, DPRA recommended that soil samples be obtained at this location (ATK, DPRA, 1989). Information about the structure of the tank and its removal was not revealed during the file review. The VSI confirmed that the tank was no longer there. The President of ISC was unable to provide any further information regarding the removal of the tank or its waste. He indicated that the NYSDEC had sampled surface soil in the past. This area is presently paved with asphalt. Evidence of staining or distressed vegetation was not observed (TRC, 1993).

ATK, DPRA identified an outdoor roll-off box (AOC #4) used for the storage of electroplating sludge (F008). The CAPT LOIS Inspection Report did not indicate a need for further investigation (ATK, DPRA, 1989). The VSI indicated that the roll-off box was no longer at its reported location. According to the President of ISC, the quantity of sludge generated in the past had been significantly reduced, and the roll-off box was no longer needed. Presently, waste sludge is stored in "tea packs" in the accumulation area (TRC, 1993).

ATK, DPRA identified a 15-gallon polypropylene spill tank (AOC #5) in the upper level plating area. The CAPT LOIS Inspection Report did not indicate a need for further investigation (ATK, DPRA, 1989). The VSI indicated that this tank had been modified to a 30-gallon stainless steel tank to contain runoff. The President of ISC indicated that the spill tank is connected to the wastewater pretreatment unit (TRC, 1993).

ATK, DPRA identified a former receiving basin (AOC #6) used to discharge wastewater to the sanitary sewer from the parts tumbler. A 1987 NYSDEC inspection was performed based on an anonymous tip that employees were dumping hazardous waste at this location. Sampling results from the receiving basin indicated elevated levels of cadmium. This area was sealed with concrete around 1987. ATK, DPRA did not recommend any further action (ATK, DPRA, 1993). The VSI performed by TRC in September 1993, confirmed that the area was sealed and inactive (TRC, 1993).

ATK, DPRA reported a pretreatment system (AOC #7) used to treat wastewater generated from the electroplating process prior to discharging it to the local Publicly Owned Treatment Works (POTW). This system was installed in 1984. Prior to 1984,

wastewater was discharged directly to the local POTW. ATK, DPRA indicated that the holding tank was overflowing during the site inspection. Subsequent sampling indicated 12 ppm of cyanide on the stairway to the lower level (the type of sample was not specified in the files reviewed). It was recommended that curbing should be installed to direct overflows to the main sump, ensuring that untreated wastewater is not discharged to the POTW via the secondary sump (ATK, DPRA 1989). The VSI indicated that an elaborate system of floor drains had been installed in all work areas ensuring that potential spills would be directed to pretreatment plant. In addition, an atomic adsorption unit was installed to continually monitor the effluent. According to the President of ISC, cyanide baths used in the plating process are being replaced with alkaline baths under the 1993 Waste Minimization Plan. He also stated that the cyanide oxidation unit was not used frequently, and it would be converted into a chromium destruction unit by 1994 (TRC, 1993).

ATK, DPRA indicated the presence of a chemical storage house in the upper level of the building (ATK, DPRA, 1989). Because this area is used for the storage of virgin chemicals, it is not classified as a RCRA unit, and not subject to discussion in the report. No other information documenting the details of the chemical storage house were present in the files reviewed. The VSI indicated that this area was still active. It was observed that some of the drums extended over the edge of the concrete berm. However, floor drains were also present to provide sufficient spill containment (TRC, 1993).

4.0 ENVIRONMENTAL SETTING

A description of the environmental setting at Industrial Services was not documented in the files reviewed. The VSI indicated that the facility appeared to be situated in an alluvial river terrace in a small valley. Newton Creek is located approximately 3,600 feet northeast, and the Chemung river is located approximately 5,000 feet south of the site. The site is generally level.

5.0 PRELIMINARY EVALUATION

Preliminary information for this evaluation is provided in Table 1. The data provided include the following: AOC description, start-up/closure dates, release status, primary contamination levels; source reference, and off-site migration potential. Analytical data for the facility are presented in Appendix B.

The ISC facility has a documented history of releases of corrosive, heavy metal, and cyanide wastes which have been detected in the vicinity of the accumulation area (AOC #1), the receiving basin (AOC #6), and the wastewater pretreatment plant (AOC #7). The following is a summary relevant modifications made to address past environmental compliance issues (TRC,1993):

- The accumulation area (former drum storage area) was certified closed as a TSDF in 1989. The area is presently active as a less-than-90-day storage area. Due to the significant reduction in sludge generated, sludge is stored in "tea packs" rather than drums. The sludge consists primarily of iron hydroxide. Cyanide is no longer used in the manufacturing process.

- The receiving basin was sealed with concrete in 1987.

- A system of floor drains was installed to ensure that all potential spills and runoff are directed to the wastewater pretreatment unit prior to discharge. An atomic adsorption unit was installed to continuously monitor the effluent.

The potential for release exists for the 600-gallon storage tank and the outdoor waste storage tank based on the files reviewed by TRC.

Data gaps were also noted. Specifically, the following items of information are necessary for further evaluation of the facility:

- A detailed description of the hydrological and geological conditions.

- Sampling results from the waste in the 600-gallon storage tank.

- Sampling results from the surface soil at the former locations of the 600-gallon storage tank and the outdoor storage tank.

- Information describing the removal of outdoor storage tank and its wastes.

- A letter confirming that interim status was approved.

Historical correspondence including ISC's formal request for generator-only status, and the NYSDEC closure acceptance letter are presented in Appendix D.

6.0 SUMMARY

ISC is a manufacturer of steel and aluminum products such as screws, bolts, and fasteners. Operations include cleaning, plating, and polishing. Eight (8) AOCs were identified during the file review and the VSI performed on September 20, 1993.

The ISC facility has a documented history releases from three of eight AOCs: the accumulation area (AOC #1), the former receiving basin (AOC #5), and the wastewater pretreatment plant (AOC #7).

The accumulation area was a former drum storage area used for the storage of electroplating sludge (F008) and spent stripping solution (D002). Elevated levels of cyanide were detected in this area prior to its closure in March 1989. Presently, it is

active as a less-than-90-day storage area for F008 waste in "tea packs." The sludge consists primarily of iron hydroxide. Brown staining and a puddle of unknown liquid was observed at this location during the VSI. The receiving basin formerly discharged untreated wastewater from the parts tumbler to the sanitary sewer. Elevated levels of cadmium were detected in the receiving basin. It has been sealed with concrete since 1987. The holding tank in the wastewater pretreatment plant was observed leaking in February 1987, and untreated wastewater was most likely discharge to the POTW via the secondary sump. Cyanide was detected in the stairwell leading to the lower level in this area. A drainage system was installed to direct all potential releases to the wastewater pretreatment plant.

The potential for release exists for two AOCs: the 600-gallon storage tank (AOC #2), and the outdoor waste storage tank (AOC #3). Both storage tanks have documentation indicating sloppy housekeeping and poor structural integrity. Elevated levels of lead and other metals were detected on the exterior of the 600-gallon storage tank. Very little information is available describing the outdoor storage tank containing cyanide waste. There is no information describing the hydrological and geological conditions of the site. Reportedly, the NYSDEC has sampled surface soil; however, the results were not obtained during the file review.

TRC notes that ATK, DPRA recommended collecting soil samples at the location of the outdoor waste storage tank, in addition to the outdoor location of the 600-gallon storage tank if the closure waste analysis deemed it appropriate (ATK, DPRA, 1989). There was not information documenting that the waste was sampled in the files reviewed by TRC. The Visual Site Inspection performed by TRC did not indicate signs of staining or distressed vegetation on the premises.

REFERENCES

ATK, DPRA, 1989. CAPT LOIS Inspection prepared by A.T. Kearney Incorporated and DPRA Incorporated for USEPA, Region II., March, 1989.

ISC, 1993. RCRA Guidelines for Industrial Environmental Corporation, 1993.

ISC, 1983. Letter from George P. Zurenda, Industrial Service Corporation, President, to Richard A. Baker, USEPA, Region II., Permits Administration Branch, October 25, 1983.

NYSDEC, 1990. NYSDEC Inspection Form prepared by Darshan R. Patel, Environmental Engineer I., for Thomas C. Jorling, NYSDEC, Commissioner, Division of Hazardous Waste Substance Regulation, November 11, 1990.

NYSDEC, 1989a. Letter from James S. Moran, NYSDEC, Division of Hazardous Waste Substance Regulation, to Joseph C. Morgan, Industrial Service Corporation, Vice President, November 3, 1989.

NYSDEC, 1989b. Post Closure Inspection Form prepared by Joseph Gavin, Assistant Chemical Engineer, for Thomas C. Jorling, NYSDEC, Commissioner, Division of Hazardous Waste Substance Regulation, October 20, 1989.

NYSDEC, 1989c. Letter from James S. Moran, NYSDEC, Division of Hazardous Waste Substance Regulation, to Joseph C. Morgan, Industrial Service Corporation, Vice President, February 3, 1989.

TEDS, 1993. Telephone call from Gaylen Salsbery, Town of Elmira, Department of Sewers, to Michael W. Miner (TRC), October 4, 1993.

VSCE, 1989. Closure Certification Report prepared by Vernon O. Shumaker Consulting Engineers for Industrial Service Corporation, July 25, 1989.

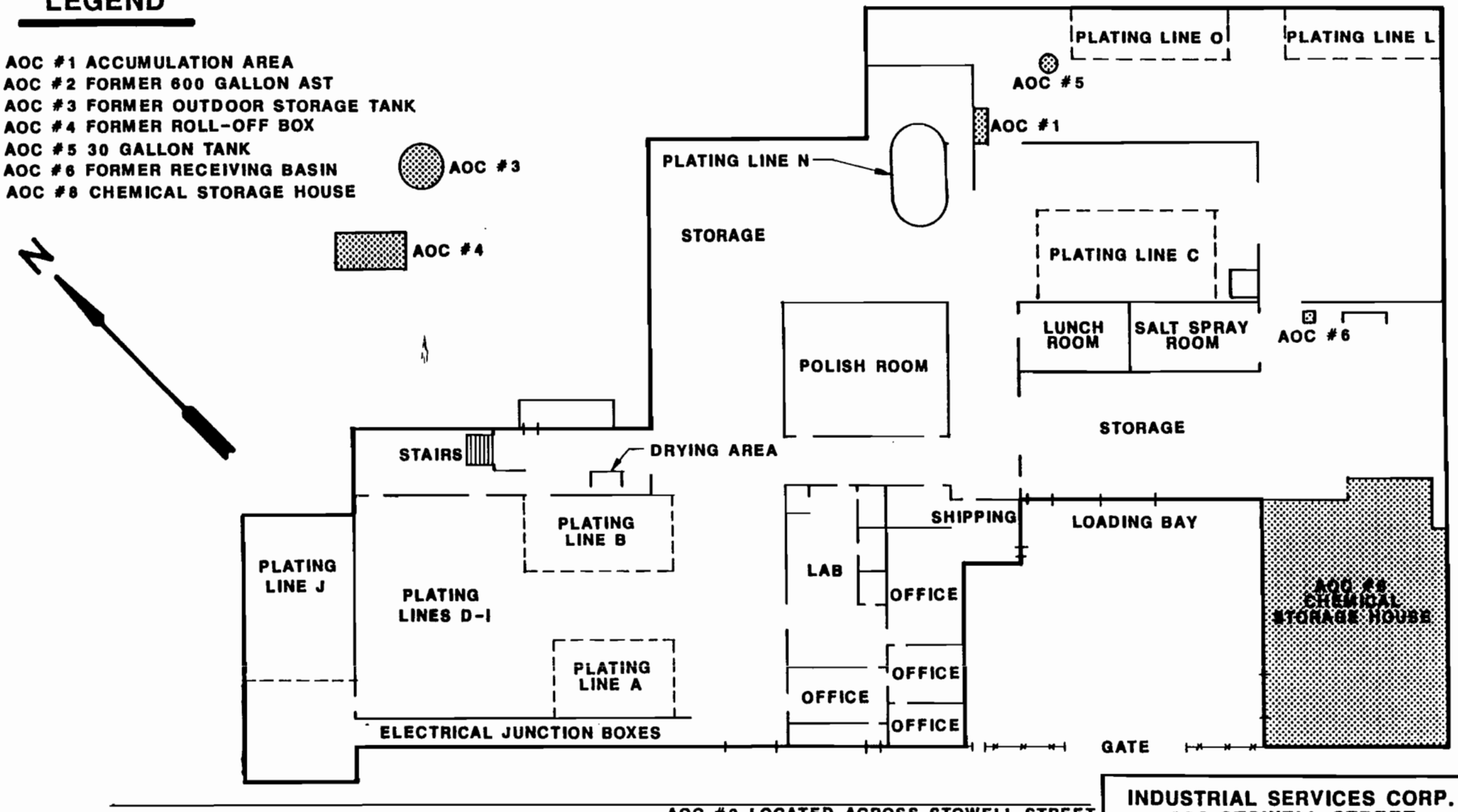
TRC, 1993. VSI performed by TRC for EPA, Region II, September 20, 1993.

APPENDIX A

FIGURES

LEGEND

AOC #1 ACCUMULATION AREA
AOC #2 FORMER 600 GALLON AST
AOC #3 FORMER OUTDOOR STORAGE TANK
AOC #4 FORMER ROLL-OFF BOX
AOC #5 30 GALLON TANK
AOC #6 FORMER RECEIVING BASIN
AOC #8 CHEMICAL STORAGE HOUSE



INDUSTRIAL SERVICES CORP.
926 STOWELL STREET
ELMIRA, NEW YORK

AOC LOCATION MAP, UPPER LEVEL

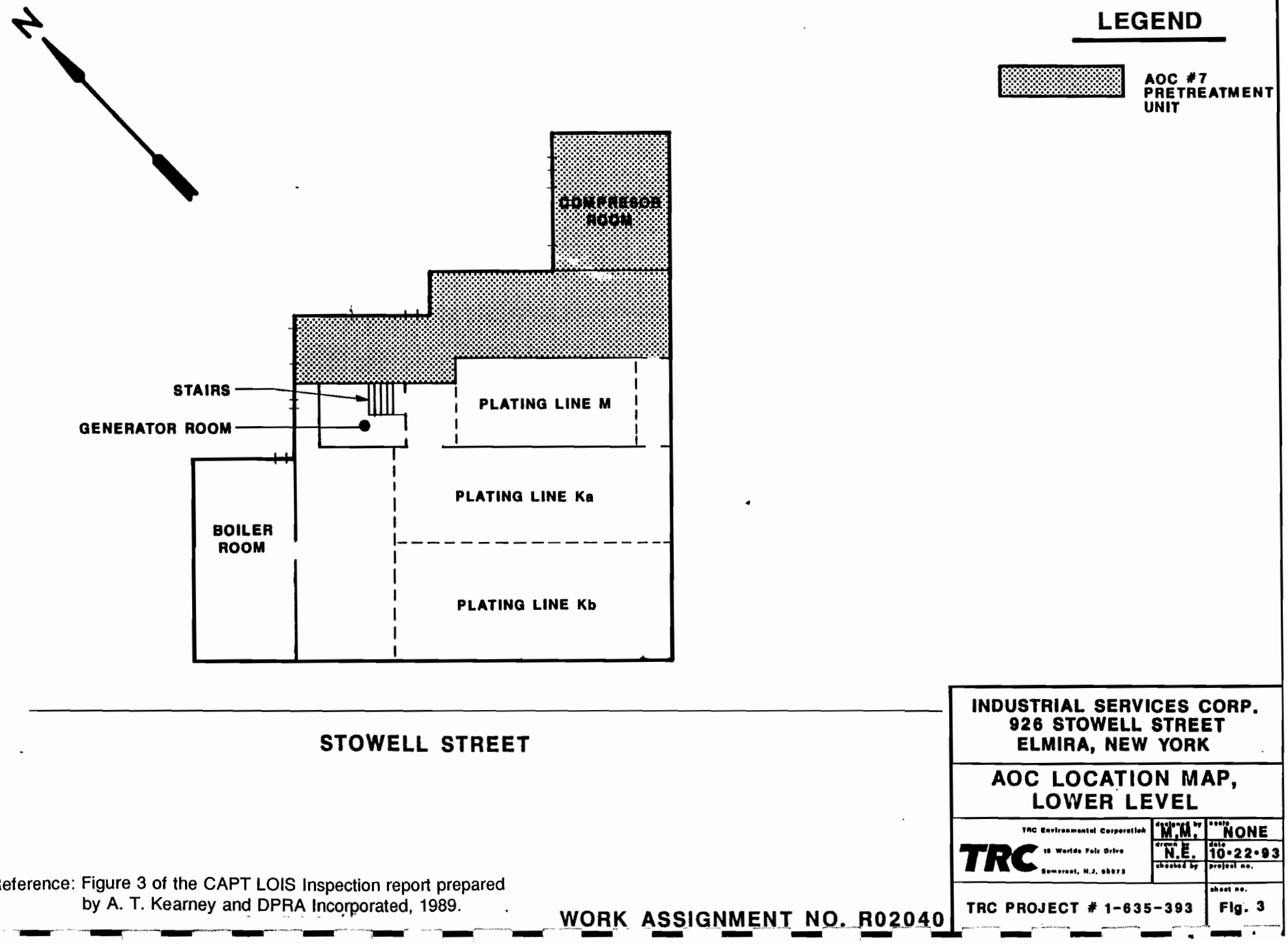
TRC Environmental Corporation
TRC 10 Worlds Fair Drive Somerset, N.J. 08873

designed by	M.M.
drawn by	N.E.
checked by	
scale	NONE
date	10-22-93
project no.	
sheet no.	Fig. 2

TRC PROJECT # 1-635-393

Reference: Figure 2 of the CAPT LOIS Inspection report prepared by A. T. Kearney and DPRA Incorporated, 1989.

WORK ASSIGNMENT NO. R02040



Reference: Figure 3 of the CAPT LOIS Inspection report prepared by A. T. Kearney and DPRA Incorporated, 1989.

INDUSTRIAL SERVICES CORP.
926 STOWELL STREET
ELMIRA, NEW YORK

AOC LOCATION MAP, LOWER LEVEL

TRC Environmental Corporation
TRC 10 Worlds Fair Drive Somerset, N.J. 08873

designed by M.M. | scale NONE
drawn by N.E. | date 10-22-93
checked by | project no.
TRC PROJECT # 1-635-393 | sheet no. Fig. 3

WORK ASSIGNMENT NO. R02040

APPENDIX B

SELECT ANALYTICAL DATA

NET NATIONAL ENVIRONMENTAL TESTING, INC.®

NET Northeast, Inc.
5854 Butternut Drive
East Syracuse, NY 13057
Tel: (315) 446-8795
Fax: (315) 449-1611

Formerly CS Environmental Laboratory, Inc.

To: VERNON O. SHUMAKER ENGINEERS
423 COMMERCE ROAD
VESTAL, NY 13850

Date: Jun 12 1989

Attention: MS. L. SHUMAKER

****

SAMPLE #6291

LABORATORY ANALYSIS REPORT

****

SAMPLE SUMMARY

CLIENT : VERNON O. SHUMAKER ENGINEERS

DATE RECEIVED : 05/17/89

JOB # : 460.004.00

DATE COLLECTED : 05/16/89

LOCATION : #1 - INDUSTRIAL SERVICES CORP.

TIME COLLECTED : 1030

METHOD :GRAB

PARAMETER	RESULTS	UNITS
CYANIDE OX	<16.	mg/kg*
CADMIUM	6.9	mg/kg*
LEAD	120.	mg/kg*

Total

* WET WEIGHT

V. C. SHUMAKER
RECEIVED
JUN 14 1989
VOS

NET warrants that any sampling and analyses conducted as part of this report are performed in accordance with the analytical industries recognized methodologies and professional standards. NET will not assume liability for any damages resulting from deficient work other than reperformance or cost of said work and will not accept any liability as a result of data interpretation by the client.

NYSDOH - ELAP #10067

APPROVED BY: Conrad Teufel Jr.

DATE: JUN 12 1989

VERNON O. SHUMAKER
Consulting Engineers
423 Commerce Road
VESTAL, NEW YORK 13850

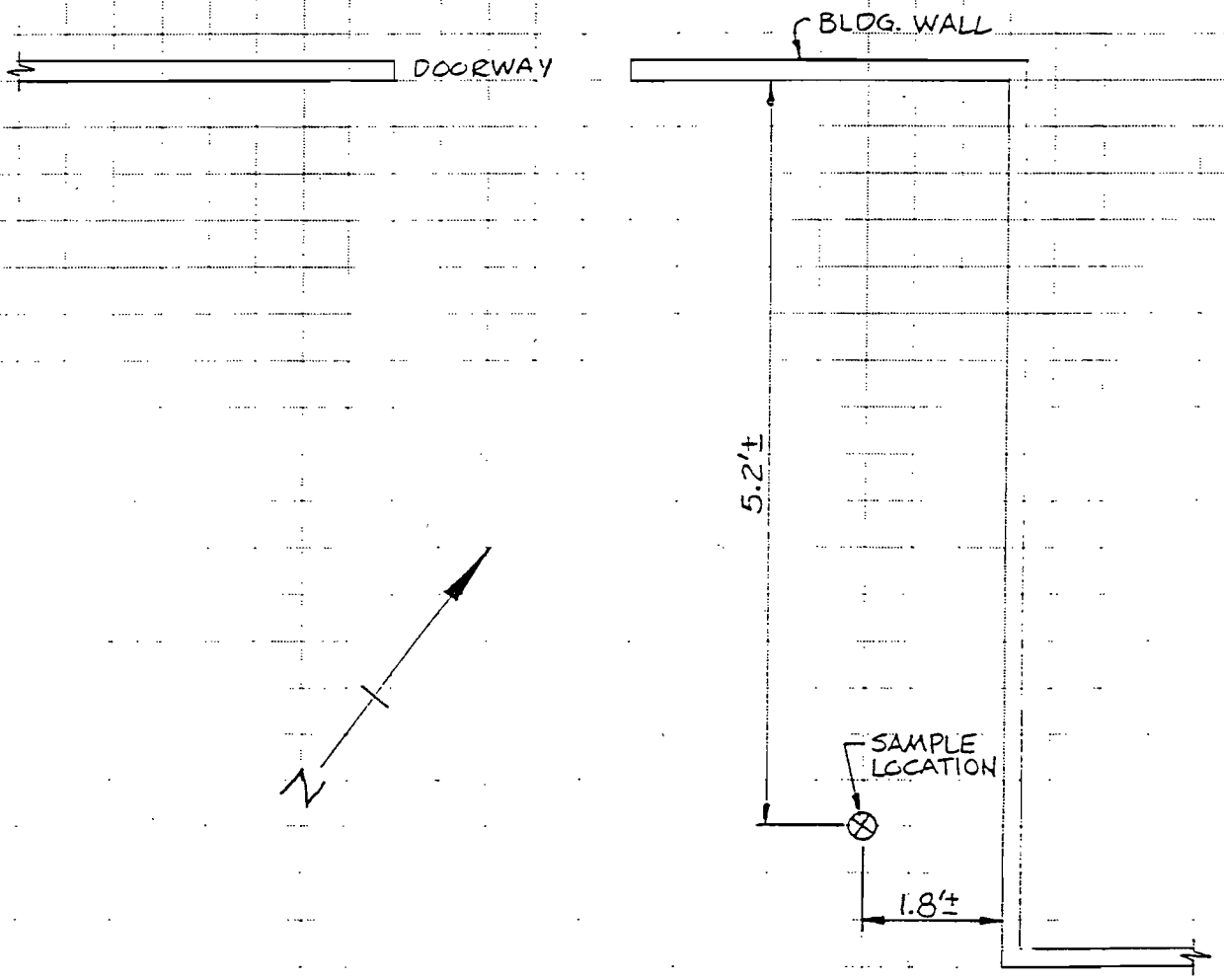
JOB INDUSTRIAL SERVICES CORP.

SHEET NO. _____ OF _____

CALCULATED BY JDH DATE _____

CHECKED BY _____ DATE _____

SCALE _____



SAMPLE NO. 1 LOCATION
(CONCRETE FLOOR SAMPLE)
(NOT TO SCALE)

NATIONAL ENVIRONMENTAL TESTING, INC.

NET Northeast, Inc.
5854 Butternut Drive
East Syracuse, NY 13057
Tel: (315) 446-8795
Fax: (315) 449-1611

Formerly CS Environmental Laboratory, Inc.

To: VERNON O. SHUMAKER ENGINEERS
423 COMMERCE ROAD
VESTAL, NY 13850

Date: Jun 12 1989

Attention: MS. L. SHUMAKER

SAMPLE #6292

LABORATORY ANALYSIS REPORT

SAMPLE SUMMARY

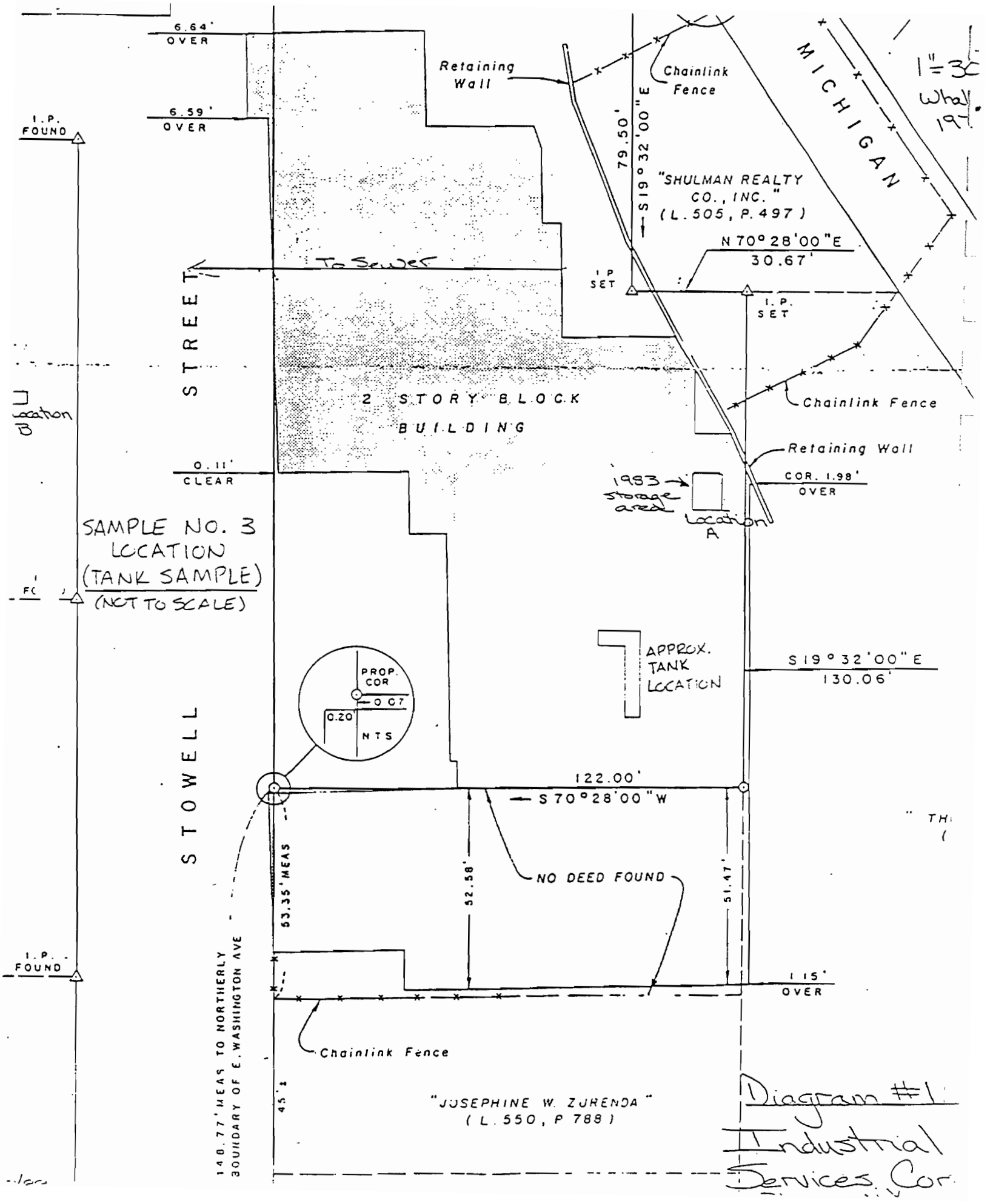
CLIENT	: VERNON O. SHUMAKER ENGINEERS	DATE RECEIVED	: 05/17/89
JOB #	: 460.004.00	DATE COLLECTED	: 05/16/89
LOCATION	: #3 - INDUSTRIAL SERVICES CORP.	TIME COLLECTED	: 1130
METHOD	:GRAB		

PARAMETER	RESULTS	UNITS
ARSENIC	32.	mg/kg*
BARIUM	3.8	mg/kg*
CADMIUM	39.	mg/kg*
CHROMIUM-T	27.	mg/kg*
LEAD	14000.	mg/kg*
MERCURY	0.13	mg/kg*
SELENIUM	<0.5	mg/kg*
SILVER	<1.5	mg/kg*

* WET WEIGHT

NYSDOH - ELAP #10067

APPROVED BY: Conrad Teufel Jr. DATE: JUN 12 1989


6.64' OVER
6.59' OVER
I.P. FOUND
Retaining Wall
Chainlink Fence
MICHIGAN
1"=3
What
19
79.50'
S19°32'00"E
"SHULMAN REALTY CO., INC."
(L.505, P.497)
N70°28'00"E
30.67'
To Sewer
I.P. SET
I.P. SET
STREET
2 STORY BLOCK BUILDING
Chainlink Fence
Retaining Wall
0.11' CLEAR
COR. 1.98' OVER
1983 storage area
Location A
SAMPLE NO. 3 LOCATION (TANK SAMPLE)
(NOT TO SCALE)
PROP. COR
0.07
0.20'
N T S
APPROX. TANK LOCATION
S19°32'00"E
130.06'
STOWELL
122.00'
S70°28'00"W
53.35' MEAS
52.58'
NO DEED FOUND
51.47'
I.P. FOUND
1.15' OVER
Chainlink Fence
140.77' MEAS TO NORTHERLY BOUNDARY OF E. WASHINGTON AVE
45.2'
"JOSEPHINE W. ZURENDA"
(L.550, P.788)
Diagram #1
Industrial Services Cor

APPENDIX C

COMPLETED PRELIMINARY REVIEW CHECKLIST

PRELIMINARY RCRA FACILTY ASSESSMENT

PRELIMINARY REVIEW CHECKLIST

WORK ASSIGNMENT NO. R02040

FACILITY: Industrial Service Corp.
926 Stowell Street
Elmira, New York
14901

EPA ID #: NYD002221430

FACILITY CONTACT: Joe Morgan
President
(607) 733-5621

KEY

P	PROVIDED
NP	NOT PROVIDED
A	ACCEPTABLE
NA	NOT ACCEPTABLE
Y	YES
N	NO
OR	OBSERVED RELEASE (DIRECT EVIDENCE)
SR	SUSPECTED RELEASE (INDIRECT EVIDENCE)
PoR	POTENTIAL RELEASE (POSSIBLE FOR A RELEASE TO OCCUR)
NR	NO RELEASE HAS OCCURRED (DIRECT EVIDENCE)
SWMU	SOLID WASTE MANAGEMENT UNIT
AOC	AREA OF CONCERN

RFA COMPONENT 1: PRELIMINARY REVIEW (PR)

A. General Manufacturing process description: ✓P ___NP ✓A ___NA

Comments: Small electroplating job shop that manufactures steel and aluminum products such as screws, bolts, and fasteners.

B. General Facility waste generation description: ✓P ___NP ✓A ___NA

Comments: Produces D008 electroplating sludge and D002 spent stripping solution

C. Environmental/hydrogeologic setting description: ___P ✓NP ___A ___NA

Comments:

D. SWMU identification list: ✓P ___NP ✓A ___NA

Comments: Eight AOCs were identified on site. Two classify as SWMUs: A drum storage area, and a 600-gallon tank.

E. Was the SWMU subset of RCRA regulated units denoted? ✓Y ___N ✓A ___NA

Comments: TSDF facility prior to 1989

F. Were other AOC's (e.g. spills, leaks) listed? ✓Y ___N ✓A ___NA

Comments:

G. Were potential off-site exposure pathways identified? (e.g. drinking water wells, irrigated farmland, swamps) ✓Y ___N ___A ✓NA

Comments: Not detailed. Two rivers are located within 5,000 feet of the site. No information regarding hydrological/geological conditions.

B. Detailed SWMU and AOC information:

SWMU # 1 or AOC Drum Storage Area

1. Is unit located on a facility map? ✓Y __N ✓A __NA

Comments: _____

2. Unit characteristics (e.g. design, liners, age, construction):
✓P __NP ✓A __NA

Comments: 70ft² Concrete pad with concrete block walls. Interior location. Closed as a TSDF in March, 1989.

3. Waste characteristics (e.g. types, volumes, classification):
✓P __NP __A ✓NA

Comments: Drum storage area for F006 (electroplating sludge) and D001 (Spent Solvent).

4. Waste Migration pathways:

a. Air: __CR __SR __PoR ✓NR

i. Is documentation provided? ✓Y __N

ii. Does the documentation provide acceptable support for the determination (CR, SR, PoR, NR)? ✓Y __N

Comments: Waste stored in drums. Potential for a significant release is negligible.

b. Soil: __CR __SR __PoR ✓NR

i. Is documentation provided? ✓Y __N

ii. Does the documentation provide acceptable support for the determination (CR, SR, PoR, NR)? ✓Y __N

Comments: Interior location. Concrete pad intacted (ATK 3 REA, 1989.)

c. Ground Water: __CR __SR __PoR ✓NR

i. Is documentation provided? ✓Y __N

ii. Does the documentation provide acceptable support for the determination (CR, SR, PoR, NR)? ✓Y __N

Comments: Interior location. Concrete pad intacted.

d. Surface Water: __CR __SR __PoR ✓NR

i. Is documentation provided? ✓Y __N

ii. Does the documentation provide acceptable support for the determination (CR, SR, PoR, NR)? ✓Y __N

Comments: Interior location.

e. Subsurface gas: __CR __SR __PoR ✓NR

i. Is documentation provided? ✓Y __N

ii. Does the documentation provide acceptable support for the determination (CR, SR, PoR, NR)? ✓Y __N

Comments: Interior location - Wastes stored in drums - Concrete pad intacted.

5. Conclusions/ Recommendations:

a. ___ No conclusion or recommendation provided.

✓ Recommended no further action.

___ Recommended a sampling visit.

i. Was sampling performed as part of this RFA? __Y __N

ii. Will the sampling be conducted in an RFI? __Y __N

___ Recommended interim measures.

___ Recommended an RFI.

Comments: Closed clean in March, 1989. Supported by ATK-DPRA 1989 CAPT EIS Inspection report.

b. Is the recommendation acceptable? ✓Y __N

Comments:

H. Detailed SWMU and AOC information:

SWMU # 2 or AOC 600-gallon Storage tank

1. Is unit located on a facility map? ✓Y __N ✓A __NA

Comments: Formerly located in the parking lot across Stancil Street. Relocated inside the building in 1987. Closed clean in 1989.

2. Unit characteristics (e.g. design, liners, age, construction):
✓P __NP ✓A __NA

Comments: 600-gallon AST. Steel structure. Asphalt pad at parking lot location not intact. Covered with asphalt shingles.

3. Waste characteristics (e.g. types, volumes, classification):
✓P __NP __A ✓NA

Comments: D001 (Corrosive) waste. pH ≈ 1.0. Possibly phosphoric acid. Quantity stored not explicit.

4. Waste Migration pathways:

a. Air: __CR __SR ✓PoR __NR

i. Is documentation provided? ✓Y __N

ii. Does the documentation provide acceptable support for the determination (CR, SR, PoR, NR)? ✓Y __N

Comments: Potential for rain water to enter the tank. Acid could have been released.

b. Soil: __CR __SR ✓PoR __NR

i. Is documentation provided? ✓Y __N

ii. Does the documentation provide acceptable support for the determination (CR, SR, PoR, NR)? ✓Y __N

Comments: Asphalt was not intacted at the parking lot location. Closure sampling indicated elevated levels of metals on the exterior of the tank.

c. Ground Water: __CR __SR ✓PoR __NR

i. Is documentation provided? ✓Y __N

ii. Does the documentation provide acceptable support for the determination (CR, SR, PoR, NR)? ✓Y __N

Comments: Asphalt not intacted. Subsurface conditions not known.

d. Surface Water: __CR __SR ✓PoR __NR

i. Is documentation provided? ✓Y __N

ii. Does the documentation provide acceptable support for the determination (CR, SR, PoR, NR)? ✓Y __N

Comments: Potential for rainwater to enter the tank. Therefore, potential for overflow to occur.

e. Subsurface gas: __CR __SR ✓PoR __NR

i. Is documentation provided? ✓Y __N

ii. Does the documentation provide acceptable support for the determination (CR, SR, PoR, NR)? ✓Y __N

Comments: Strong acid and water may produce acidic gases.

5. Conclusions/ Recommendations:

a. ✓ No conclusion or recommendation provided.

___ Recommended no further action.

___ Recommended a sampling visit.

i. Was sampling performed as part of this RFA? __Y __N

ii. Will the sampling be conducted in an RFI? __Y __N

___ Recommended interim measures.

___ Recommended an RFI.

Comments: Subsurface conditions are unknown. Evidence of sloppy housekeeping. Recommend a VSI.

b. Is the recommendation acceptable? ✓Y __N

Comments: More information is needed. ATK-DPRA suggested that soil sampling may be warranted (1989).

H. Detailed SWMU or AOC information:

SWMU # 3 or AOC Outdoor Storage tank

1. Is the unit located on a facility map? ✓Y ___N ___A ✓NA

Comments: Reportedly located at the edge of a steep hillon the north sid of the facility.

2. Unit characteristics (e.g. design, liners, age, construction):
✓Y ___N ___A ✓NA

Comments: Reportedly 400-500 gallon AST covered with plywood.

3. Waste characteristics (e.g. types, volumes, classification):
✓Y ___N ___A ✓NA

Comments: Reportedly 400-500 gallons. Contained cyanide waste. Above ground Storage tank.

4. Waste migration pathways:

a. Air: ___OR ___SR ✓PoR ___NR

i. Is documentation provided? ✓Y ___N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ___Y ✓N

Comments: Files support that the tank was covered with plywood. Rain entering the tank could produce cyanide gas.

b. Soil: ___OR ___SR ✓PoR ___NR

i. Is documentation provided? ✓Y ___N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ___Y ✓N

Comments: Located at the edge of a steep hill. There is no information describing the surface it was located on.

c. Ground water: ___OR ___SR ✓PoR ___NR

i. Is documentation provided? ✓Y ___N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ___Y ✓N

Comments: Located at the edge of a steep hill. No information describing the supporting surface or groundwater elevation.

d. Surface Water: __CR __SR ✓PoR __NR

i. Is documentation provided? ✓Y __N

ii. Does the documentation provide acceptable support for the determination (CR, SR, PoR, NR)? ✓Y __N

Comments: It is suggested that rain may be able to enter the tank since it is covered with plywood.

e. Subsurface gas: __CR __SR ✓PoR __NR

i. Is documentation provided? ✓Y __N

ii. Does the documentation provide acceptable support for the determination (CR, SR, PoR, NR)? ✓Y __N

Comments: Supporting surface not described. The potential for HCN gas exists.

5. Conclusions/ Recommendations:

a. ✓ No conclusion or recommendation provided.

___ Recommended no further action.

___ Recommended a sampling visit.

i. Was sampling performed as part of this RFA? __Y __N

ii. Will the sampling be conducted in an RFI? __Y __N

___ Recommended interim measures.

___ Recommended an RFI.

Comments: Insufficient information describing this area. The exact location of this tank is unknown. Recommend a VSI.

b. Is the recommendation acceptable? ✓Y __N

Comments: A sampling visit may be warrented. ATK-DPRA responds to this accommodation (1989).

H. Detailed SWMU or AOC information:

SWMU # 4 or AOC Roll-off Box

1. Is the unit located on a facility map? ✓Y ___N ✓A ___NA

Comments: Located outside the north end of the facility.

2. Unit characteristics (e.g. design, liners, age, construction):
✓Y ___N ___A ✓NA

Comments: Covered with a tarp. Sludge storage roll-off box. Size not specified. Located on a paved surface.

3. Waste characteristics (e.g. types, volumes, classification):
✓Y ___N ✓A ___NA

Comments: F006 electroplating sludge is stored here. 45.7 tons generated per year. Comprised primarily of iron hydroxide in addition to smaller quantities of other metal hydroxides.

4. Waste migration pathways:

a. Air: ___OR ___SR ___PoR ✓NR

i. Is documentation provided? ✓Y ___N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ✓Y ___N

Comments: Solid waste. Metal hydroxides non volatile.

b. Soil: ___OR ___SR ___PoR ✓NR

i. Is documentation provided? ✓Y ___N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ✓Y ___N

Comments: Located on paved area. Covered with a tarp.

c. Ground water: ___OR ___SR ___PoR ✓NR

i. Is documentation provided? ✓Y ___N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ✓Y ___N

Comments: Paved area. Solid waste. Rolloff box covered when not in use.

d. Surface water: ___OR ___SR ___PoR ✓NR

i. Is documentation provided? ✓Y ___N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ✓Y ___N

Comments: roll-off box covered when not in use. Solid waste.

e. Subsurface gas: ___OR ___SR ___PoR ✓NR

i. Is documentation provided? ✓Y ___N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ✓Y ___N

Comments: Metal hydroxides nonvolatile. Solid waste.

5. Conclusions/Recommendations:

a. ___ No conclusion or recommendation provided.

✓ Recommend no further action.

___ Recommend a sampling visit.

i. Was sampling performed as part of this RFA? __Y __N

ii. Will the sampling be conducted in a RFI? __Y __N

___ Recommend interim measures.

___ Recommend a RFI.

Comments:

b. Is the recommendation acceptable? ✓Y ___N

Comments: Supported by 1989 CMPT 2015 Inspection. results.

H. Detailed SWMU or AOC information:

SWMU # 5 or AOC Spill tank

1. Is the unit located on a facility map? ✓Y ___N ✓A ___NA

Comments: Located in the upper level plating area.

2. Unit characteristics (e.g. design, liners, age, construction):
✓Y ___N ✓A ___NA

Comments: 30-gallon polypropylene tank installed after 1989. Used to contain spills and surface water in the upper level plating area. Protected w/a metal grate.

3. Waste characteristics (e.g. types, volumes, classification):
✓Y ___N ✓A ___NA

Comments: Black oxide, rinse water, and water from rinse tanks.

4. Waste migration pathways:

a. Air: ___OR ___SR ___PoR ✓NR

i. Is documentation provided? ✓Y ___N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ✓Y ___N

Comments: Wastes transported to pretreatment plant from this location. Quantity that may volatilize is insignificant.

b. Soil: ___OR ___SR ___PoR ✓NR

i. Is documentation provided? ✓Y ___N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ✓Y ___N

Comments: Indoor location, upper level, not exposed to soil.

c. Ground water: ___OR ___SR ___PoR ✓NR

i. Is documentation provided? ✓Y ___N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ✓Y ___N

Comments: Not in contact with the ground surface. Wastes are ultimately discharged to the pretreatment plant.

d. Surface water: ___OR ___SR ___PoR ✓NR

i. Is documentation provided? ✓Y ___N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ✓Y ___N

Comments: Wastes discharged to the pretreatment plant.

e. Subsurface gas: ___OR ___SR ___PoR ✓NR

i. Is documentation provided? ✓Y ___N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ✓Y ___N

Comments: Wastes discharged to the pretreatment plant. Not in contact with the ground surface.

5. Conclusions/Recommendations:

a. ___ No conclusion or recommendation provided.

✓ Recommend no further action.

___ Recommend a sampling visit.

i. Was sampling performed as part of this RFA? __Y __N

ii. Will the sampling be conducted in a RFI? __Y __N

___ Recommend interim measures.

___ Recommend a RFI.

Comments:

b. Is the recommendation acceptable? ✓Y ___N

Comments: Supported by ATK-DPRA CAPT LOIS inspection, 1989.

H. Detailed SWMU or AOC information:

SWMU # 6 or AOC Receiving Basin

1. Is the unit located on a facility map? ✓Y ___N ___A ___NA

Comments: Located in the upper level of the building.

2. Unit characteristics (e.g. design, liners, age, construction):
___Y ___N ___A ✓NA

Comments: Interior location, concrete structure, sealed prior to 1989. Cross sectional area approximately 2ft by 3ft. Depth not indicated.

3. Waste characteristics (e.g. types, volumes, classification):
✓Y ___N ___A ___NA

Comments: Received wastewater from the parts tumbler and discharged to the sanitary sewer.

4. Waste migration pathways:

a. Air: ___OR ___SR ___PoR ✓NR

i. Is documentation provided? ✓Y ___N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ___Y ___N

Comments: Predominantly metals in water with the possibility for small amounts of acids, bases, and cyanide. The release potential is insignificant.

b. Soil: ___OR ___SR ___PoR ✓NR

i. Is documentation provided? ✓Y ___N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ✓Y ___N

Comments: Located in the upper level. Concrete structure. Discharged to sewer.

c. Ground water: ___OR ___SR ___PoR ✓NR

i. Is documentation provided? ✓Y ___N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ✓Y ___N

Comments: Located in the upper level. Concrete structure. Discharged to the sewer.

d. Surface water: ___OR ✓SR ___PoR ___NR

i. Is documentation provided? ✓Y ___N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ✓Y ___N

Comments: Discharged to the sewer. If the local POTW could not handle the levels discharged there is a potential for release. Levels of CD detected here.

e. Subsurface gas: ___OR ___SR ___PoR ✓NR

i. Is documentation provided? ✓Y ___N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ✓Y ___N

Comments: Upper level location. Metals not volatile. Discharged to the sewer. Concrete structure.

5. Conclusions/Recommendations:

a. ___ No conclusion or recommendation provided.

✓ Recommend no further action.

___ Recommend a sampling visit.

i. Was sampling performed as part of this RFA? __Y __N

ii. Will the sampling be conducted in a RFI? __Y __N

___ Recommend interim measures.

___ Recommend a RFI.

Comments: The recharge basin is sealed.

b. Is the recommendation acceptable? ✓Y ___N

Comments: There is no documented evidence warrenting further investigation. Supported by 1989 CAMU LOI's?

H. Detailed SWMU or AOC information:

SWMU # 7 or AOC Wastewater Pretreatment Plant

1. Is the unit located on a facility map? ✓Y ___N ✓A ___NA

Comments: Located in the lower level of the main building.

2. Unit characteristics (e.g. design, liners, age, construction):
✓Y ___N ✓A ___NA

Comments: Process Steps: Basement Sump, main sump, Cyanide oxidation unit, holding tank, Electrochemical cells, degassing tank, Clarifier, filter Press, Filter Press Hopper, Secondary Sump.

3. Waste characteristics (e.g. types, volumes, classification):
✓Y ___N ___A ✓NA

Comments: F008 electroplating sludge is generated. Pretreated water is discharged to the POTW.

4. Waste migration pathways:

a. Air: ___OR ___SR ___PoR ✓NR

i. Is documentation provided? ✓Y ___N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ✓Y ___N

Comments: Solid waste is generated with metals. Wastewater is treated and sent to the POTW. No VOCs.

b. Soil: ___OR ___SR ___PoR ✓NR

i. Is documentation provided? ✓Y ___N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ✓Y ___N

Comments: Interior location. System of drains installed to contain all potential spills and runoff. All spills and runoff return to the pretreatment system.

c. Ground water: ___OR ___SR ___PoR ✓NR

i. Is documentation provided? ✓Y ___N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ✓Y ___N

Comments: Interior location. System is well contained by a drainage system.

d. Surface Water: __OR ✓SR __PoR __NR

i. Is documentation provided? ✓Y __N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ✓Y __N

Comments: Holding tank was leaking during CAPT LOIS inspection. No curbing to prevent untreated wastewater from discharging to POTW via secondary sump.

e. Subsurface gas: __OR __SR __PoR ✓NR

i. Is documentation provided? ✓Y __N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? ✓Y __N

Comments: Metal containing water and solids. Nonvolatile.

5. Conclusions/ Recommendations:

a. ✓ No conclusion or recommendation provided.

___ Recommended no further action.

___ Recommended a sampling visit.

i. Was sampling performed as part of this RFA? __Y __N

ii. Will the sampling be conducted in an RFI? __Y __N

___ Recommended interim measures.

___ Recommended an RFI.

Comments: Recommend a visual site inspection

b. Is the recommendation acceptable? ✓Y __N

Comments: ATK-DERA recommended that curbing should be installed around the holding tank (1989).

H. Detailed SWMU and AOC information:

SWMU # 8 or AOC Chemical Storage Hut

1. Is unit located on a facility map? ✓Y __N ✓A __NA

Comments: Located in the upper level of the building.

2. Unit characteristics (e.g. design, liners, age, construction):
__P ✓NP __A __NA

Comments: Storage area for virgin chemicals

3. Waste characteristics (e.g. types, volumes, classification):
__P ✓NP __A __NA

Comments: Storage area for virgin chemicals.

4. Waste Migration pathways:

a. Air: __CR __SR ✓PoR __NR

i. Is documentation provided? __Y ✓N

ii. Does the documentation provice acceptable support for the determination (CR, SR, PoR, NR)? __Y ✓N

Comments: No information provided in the files.

b. Soil: __CR __SR ✓PoR __NR

i. Is documentation provided? __Y ✓N

ii. Does the documentation provide acceptable support for the determination (CR, SR, PoR, NR)? __Y ✓N

Comments: No information provided in the files

c. Ground Water: __CR __SR ✓PoR __NR

i. Is documentation provided? __Y ✓N

ii. Does the documentation provide acceptable support for the determination (CR, SR, PoR, NR)? __Y ✓N

Comments: No information provided in the files.

d. Surface Water: __CR __SR ✓PoR __NR

i. Is documentation provided? __Y ✓N

ii. Does the documentation provide acceptable support for the determination (CR, SR, PoR, NR)? __Y ✓N

Comments: No information provided in the files.

e. Subsurface gas: __CR __SR ✓PoR __NR

i. Is documentation provided? __Y ✓N

ii. Does the documentation provide acceptable support for the determination (CR, SR, PoR, NR)? __Y ✓N

Comments: No information provided in the files.

5. Conclusions/ Recommendations:

a. ✓ No conclusion or recommendation provided.

___ Recommended no further action.

___ Recommended a sampling visit.

i. Was sampling performed as part of this RFA? __Y __N

ii. Will the sampling be conducted in an RFI? __Y __N

___ Recommended interim measures.

___ Recommended an RFI.

Comments: No information is available because this a storage area for virgin chemicals. RCRA investigations are concerned with waste. Possible VSI

b. Is the recommendation acceptable? ✓Y __N

Comments:

I. Did the PR identify any data gaps? ✓Y ___N ___A ___NA

a. If "Y", list the data gaps: Hydrological / geological description, Sampling results from the 600-gallon storage tank and its location, Sampling results from the location of the outdoor storage tank, information documenting its removal, letter confirming interim status was approved, details of the chemical storage hut.

Comments: _____

J. Other comments on the PR: _____

RFA Component 2: Visual Site Inspection (VSI)

A. General description of VSI activities: ✓P __NP ✓A __NA

Comments: The facility was inspected inside and outside. Some paper work was reviewed. Pictures were taken.

B. Site safety plan including the monicring of vapor emissions (respirators, chemically resistant clothing, etc.): ✓P __NP ✓A __NA

Comments: Steel toe boots, safety glasses, hard hat, coveralls, full-face air-purifying respirator.

C. Facility inspection:

1. Was each SWMU noted in the PR examined? ✓Y __N

Comments: the 600-gallon storage tank and outdoor waste storage tank no longer exist.

2. Was each AOC noted in the PR examined? ✓Y __N

Comments: the roll-off box no longer exists.

3. Was the entire facility traversed in order to identify additional AOCs identify additinal SWMUs, complete data gaps from the PR, etc.? ✓Y __N __A ✓NA

Comments: No information was available describing the outdoor storage tank. (AOC#3). No other AOCs were identified.

a. Were additional SWMUs and/or AOCs noted ? __Y ✓N

Comments:

4. Did the VSI include an inspection beyond the facility boundary? ✓Y __N

Comments: Visually - the surroundings were documented. There was an adjacent junk yard and coal yard. A river and creek were within 5,000 ft.

5. SWMU # 1 or AOC Accumulation Area (formerly drum storage ar

a. Documentation of field observations in logbook: ✓P __NP __A __NA

i. Visual evidence of unit characteristics (integrity, location): ✓P __NP ✓A __NA

Comments: Concrete floor, concrete block walls, interior location. F008 sludge stored in "tea packs" on wooden crates.

ii. Visual evidence of waste characteristics (e.g. labels): ✓P ___ NP ___ Not applicable

Comments: D008 electroplating sludge containing iron hydroxide

iii. Visual evidence of pollutant migration pathways (e.g. erosion, run-off): ✓P __NP

Comments: None observed.

iv. Visual evidence of release (e.g. discolored soils, dead vegetation): ✓P __NP __Not applicable

Comments: The concrete floor was stained with brown discoloration. There was a puddle next to one of the "tea packs" indicating possibly a small spill.

v. Visual evidence of exposure potential (e.g. swamp, drinking water wells): ✓P __NP __Not applicable

Comments: none observed.

b. Documentation of SWMU / AOC characteristics and potential migration pathways by photography? ✓Y __N

Comments: Photographs were taken. There did not appear to be any potential mitigation pathways

5. SWU # 2 or AOC 600-gallon storage tank

a. Documentation of field observations in logbook: ✓P __NP __A ✓NA

i. Visual evidence of unit characteristics (integrity, location): __P ✓NP __A __NA

Comments: Tank was no longer there. Imported outdoor location. The asphalt pad was in poor condition.

ii. Visual evidence of waste characteristics (e.g. labels): __ P ✓ NP __ Not applicable

Comments: The tank no longer exists.

iii. Visual evidence of pollutant migration pathways (e.g. erosion, run-off): ✓P __NP

Comments: Asphalt surface at outdoor location was of poor structural integrity. Potential for surface water and ground water transport.

iv. Visual evidence of release (e.g. discolored soils, dead vegetation): ✓P __NP __Not applicable

Comments: none observed. No signs of staining or distressed vegetation.

v. Visual evidence of exposure potential (e.g. swamp, drinking water wells): ✓P __NP __Not applicable

Comments: none observed.

b. Documentation of SWU / AOC characteristics and potential migration pathways by photography? ✓Y __N

Comments: photo of asphalt pad where the tank was located.

5. SWMU # 3 or AOC Outdoor waste storage tank.

a. Documentation of field observations in logbook: __P ✓NP __A __NA

i. Visual evidence of unit characteristics (integrity, location): __P ✓NP __A __NA

Comments: The tank was no longer there. The former location is not explicit. No information was available. The area is presently paved with asphalt

ii. Visual evidence of waste characteristics (e.g. labels): __ P ✓ NP __ Not applicable

Comments: _____

iii. Visual evidence of pollutant migration pathways (e.g. erosion, run-off): __P ✓NP

Comments: Do not know the exact location of the tank or its structural details. The surface is presently paved with asphalt.

iv. Visual evidence of release (e.g. discolored soils, dead vegetation): ✓P __NP __Not applicable

Comments: No indication of staining or distressed vegetation was observed at the site.

v. Visual evidence of exposure potential (e.g. swamp, drinking water wells): ✓P __NP __Not applicable

Comments: None observed

b. Documentation of SWMU / AOC characteristics and potential migration pathways by photography? ✓Y __N

Comments: Picture of the paved area.

5. SMU # 4 or AOC Roll-off Box

a. Documentation of field observations in logbook: __P ✓NP __A __NA

i. Visual evidence of unit characteristics (integrity, location): __P ✓NP __A __NA

Comments: Roll-off box is no longer there. Located on an asphalt pad.

ii. Visual evidence of waste characteristics (e.g. labels): __ P ✓__ NP __ Not applicable

Comments:

iii. Visual evidence of pollutant migration pathways (e.g. erosion, run-off): ✓P __NP

Comments: None observed.

iv. Visual evidence of release (e.g. discolored soils, dead vegetation): ✓P __NP __Not applicable

Comments: No visual evidence of staining or distressed vegetation.

v. Visual evidence of exposure potential (e.g. swamp, drinking water wells): ✓P __NP __Not applicable

Comments: None observed.

b. Documentation of SMU / AOC characteristics and potential migration pathways by photography? __Y ✓N

Comments: Picture of paved area.

5. SWMU # 5 or AOC Spill tank

a. Documentation of field observations in logbook: ✓P __NP __A __NA

i. Visual evidence of unit characteristics (integrity, location): ✓P __NP __A __NA

Comments: 30-gallon Stainless steel tank used to contain spills & runoff.

ii. Visual evidence of waste characteristics (e.g. labels): ✓P __ NP __ Not applicable

Comments: Block oxide, rinsewater, water from cleaning tanks.

iii. Visual evidence of pollutant migration pathways (e.g. erosion, run-off): ✓P __NP

Comments: none observed.

iv. Visual evidence of release (e.g. discolored soils, dead vegetation): ✓P __NP __Not applicable

Comments: Concrete surrounding the tank appears to be moist and stained. However, discharge to the pretreatment unit.

v. Visual evidence of exposure potential (e.g. swamp, drinking water wells): ✓P __NP __Not applicable

Comments: none observed

b. Documentation of SWMU / AOC characteristics and potential migration pathways by photography? ✓Y __N

Comments: Connected to the pretreatment plant.

5. SWIU # 6 or AOC Receiving Basin

a. Documentation of field observations in logbook: ✓P __NP __A __NA

i. Visual evidence of unit characteristics (integrity, location): ✓P __NP __A __NA

Comments: Concrete rectangular, 2 x 3 ft, depth not known, sealed with concrete.

ii. Visual evidence of waste characteristics (e.g. labels): __ P ✓NP __ Not applicable

Comments: _____

iii. Visual evidence of pollutant migration pathways (e.g. erosion, run-off): ✓P __NP

Comments: Inactive and sealed. No pathways.

iv. Visual evidence of release (e.g. discolored soils, dead vegetation): ✓P __NP __Not applicable

Comments: Concrete area intact. Area did not appear to be stained.

v. Visual evidence of exposure potential (e.g. swamp, drinking water wells): ✓P __NP __Not applicable

Comments: Use to discharge to the sewer. Presently sealed. No exposure potential.

b. Documentation of SWIU / AOC characteristics and potential migration pathways by photography? ✓Y __N

Comments: Inactive since 1987. Sealed with concrete.

5. SWIU # 7 or AOC waste water pretreatment unit.

a. Documentation of field observations in logbook: ✓P __NP __A __NA

i. Visual evidence of unit characteristics (integrity, location): ✓P __NP __A __NA

Comments: All process steps were observed and appeared to be functioning properly. The cyanide oxidation unit is not used frequently due to reduction of cyanide use.

ii. Visual evidence of waste characteristics (e.g. labels): ✓P __NP __Not applicable

Comments: generates F006 sludge containing metal hydroxides. Iron is primary constituent. Water is discharged from the pretreatment area to the POTW.

iii. Visual evidence of pollutant migration pathways (e.g. erosion, run-off): ✓P __NP

Comments: discharges effluent to POTW. Inside area is contained by a system of drains connected back to the pretreatment system.

iv. Visual evidence of release (e.g. discolored soils, dead vegetation): ✓P __NP __Not applicable

Comments: none observed. Atomic adsorption unit monitors effluent continuously.

v. Visual evidence of exposure potential (e.g. swamp, drinking water wells): ✓P __NP __Not applicable

Comments: none observed. Area is contained by a drainage system connected to the pretreatment plant.

b. Documentation of SWIU / AOC characteristics and potential migration pathways by photography? ✓Y __N

Comments: _____

5. SWMU # 8 or AOC Chemical Storage Hut

a. Documentation of field observations in logbook: __P ✓NP __A ✓NA

i. Visual evidence of unit characteristics (integrity, location): ✓P __NP ✓A __NA

Comments: Concrete floor - L-shaped with each leg approximately 20' x 8'. Drums located on metal grates supported by berms. Floor drains are also present.

ii. Visual evidence of waste characteristics (e.g. labels): __ P __ NP ✓ Not applicable

Comments: Waste not stored here. Virgin chemicals include = hydrochloric acid, Sodium hydroxide, copper and zinc solution, and black oxide.

iii. Visual evidence of pollutant migration pathways (e.g. erosion, run-off): ✓P __NP

Comments: None observed.

iv. Visual evidence of release (e.g. discolored soils, dead vegetation): ✓P __NP __Not applicable

Comments: None observed.

v. Visual evidence of exposure potential (e.g. swamp, drinking water wells): ✓P __NP __Not applicable

Comments: None observed

b. Documentation of SWMU / AOC characteristics and potential migration pathways by photography? ✓Y __N

Comments: Intact concrete. Area well contained. No Pathways observed.

Note: information was obtained by telephone Conversation with TRC inspector..

6. Were the results of the VSI integrated with the PR to provide consistency, to complete any data gaps, and to provide the best recommendations? ✓Y __N

Comments: Sufficient information is not available for the 600-gallon storage tank (AOC No. 2) and the outdoor waste storage tank (AOC No. 3)

D. Other comments on the VSI:

The facility is generally in good condition. There was no visual evidence of releases observed at the facility that would indicate exposure or off-site migration. It is apparent that they have taken a proactive approach toward addressing past problems and complying with environmental regulations.

RFA REVIEW SUMMARY

A. List all SWMUs identified (inclusive of the PR and VSI):

# 1	Accumulation Area	#	
# 2	former 600-gallon storage tank	#	
# 3	former outdoor waste storage tank	#	
# 4	roll-off box (former)	#	
# 5	spill tank	#	
# 6	receiving basin	#	
# 7	wastewater pretreatment system.	#	
# 8	Chemical Storage Hut	#	
#		#	
#		#	
#		#	
#		#	
#		#	
#		#	
#		#	
#		#	
#		#	
#		#	
#		#	
#		#	

B. List SWMUs known by reviewer but not included in the RFA:

#		#	
#		#	
#		#	
#		#	
#		#	

J. Does the RFA summary report integrate the findings of the PR, VSI, and SV? __Y ✓

Comments: A sampling visit was not performed.

K. Any additional / miscellaneous comments on the RFA:

C. List ACCs identified in the RFA:

# ___	_____	# ___	_____
# ___	_____	# ___	_____
# ___	_____	# ___	_____
# ___	_____	# ___	_____
# ___	_____	# ___	_____

D. List ACCs known by reviewer but not included in the RFA:

# ___	_____	# ___	_____
# ___	_____	# ___	_____
# ___	_____	# ___	_____
# ___	_____	# ___	_____
# ___	_____	# ___	_____

E. List SWMUs / ACCs which must be reevaluated due to inaccuracies in the PR, VSI, or SV:

# 2	former 600-gallon storage tank	# ___	_____
# 3	former outdoor storage tank.	# ___	_____
# ___	_____	# ___	_____
# ___	_____	# ___	_____
# ___	_____	# ___	_____
# ___	_____	# ___	_____
# ___	_____	# ___	_____
# ___	_____	# ___	_____
# ___	_____	# ___	_____

F. List SWMUs / AOCs which have been assessed accurately to require no further action:

# 1	accumulation area	# 8	chemical storage hut
# 2	roll-off box (former)	#	
# 5	spill tanks	#	
# 6	former receiving basin	#	
# 7	wastewater pretreatment plant	#	

G. List SWMUs / AOCs which have been assessed accurately to require an RFI:

#		#	
#		#	
#		#	
#		#	
#		#	

H. List SWMUs / AOCs which have been assessed accurately to require interim measures:

#		#	
#		#	
#		#	
#		#	
#		#	

I. Summarize any inconsistencies found between the PR, VSI, and SV:

The 600-gallon storage tank and roll-off box are no longer at the site. The former drum storage area is presently an accumulation area for sludge in "tote packs". Cyanide is currently being phased out of the manufacturing process. A drainage system and an atomic adsorption unit was installed on the pretreatment unit.

APPENDIX D

HISTORICAL CORRESPONDENCE

EPA I.D. NUMBER

F NYD002221430

I. EPA I.D. NUMBER

III. FACILITY NAME

FACILITY MAILING ADDRESS

FACILITY LOCATION

NYD002221430

Industrial Service Corp.
326 Stowell Street
Elmira, New York 14901

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X	
C. Is this facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

SPECIFIC QUESTIONS	YES	NO	FORM ATTACHED
B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)			
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

SKIP INDUSTRIAL SERVICE CORP

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)	B. PHONE (area code & no.)
William Karski Vice President	607 733 5621

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX

326 Stowell St

B. CITY OR TOWN	C. STATE	D. ZIP CODE
Elmira	NY	14901

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

326 Stowell St

B. COUNTY NAME

Chemung

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)
Elmira	NY	14901	

EPA Form 3510-1 (6-80)

3470 (specify) Electroplating & Surface Finishing

(specify)

(specify)

D. FOURTH

(specify)

INFORMATION

INDUSTRIAL SERVICE CORP

STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)

D. PHONE (area code & no.)

M = PUBLIC (other than federal or state)
O = OTHER (specify)

P (specify)

A 607 733

STREET OR P.O. BOX

66 STOWELL ST

F. CITY OR TOWN

ELMIRA NY

IX. INDIAN LAND
Is the facility located on Indian lands?
YES

ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)

D. PSD (Air Emissions from Proposed Sources)

9 P

(Underground Injection of Fluids)

E. OTHER (specify)

9

(specify)

C. RCRA (Hazardous Wastes)

E. OTHER (specify)

9

(specify)

...this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

NATURE OF BUSINESS (provide a brief description)

Electroplating & Surface Finishing, and Anodizing
We Provide A Service only - No Production of
Parts.

CERTIFICATION (see instructions)

...under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

NAME & OFFICIAL TITLE (type or print)

William Karski

B. SIGNATURE

William Karski

C. DATE SIGNED

11-14-

COMMENTS FOR OFFICIAL USE ONLY

Form 3510-1 (6-80) REVERSE

EPA

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Sections 3005 and 3010 of RCRA.)

I. EPA I.D. NUMBER: N Y D 0 0 2 2 [illegible]

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr, mo, & day)

COMMENTS:

II. FIRST OR REVISED APPLICATION

(Enter "X" in the appropriate box in A or B below. Mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. *(If this is your first application and you already know your facility's EPA I.D. number, or if you are revising information, enter your I.D. number in Item I above.)*

FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OF THE FACILITY'S COMMENCEMENT OF CONSTRUCTION OR THE DATE CONSTRUCTION COMMENCED

[illegible] 8 5

2. NEW FACILITY *(Complete item below.)*

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) CONSTRUCTION IS EXPECTED TO COMMENCE

[illegible]

B. REVISED APPLICATION *(Complete item below.)*

1. FACILITY HAS INTERIM STATUS

2. FACILITY HAS A RCRA PERMIT

III. PROCESSES - CODES AND DESIGN CAPACITIES

PROCESS CODE — Enter the code from the list of process codes below that best describes each process to be used at the facility. Two lines are provided for entering codes. If more lines are needed, enter the codes in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

PROCESS DESIGN CAPACITY — For each code entered in column A enter the capacity of the process.

1. AMOUNT — Enter the amount.
2. UNIT OF MEASURE — For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
[illegible]	S01	GALLONS OR LITERS
[illegible]	S02	GALLONS OR LITERS
[illegible]	S03	CUBIC YARDS OR CUBIC METERS
[illegible]	S04	GALLONS OR LITERS
[illegible]	S05	GALLONS OR LITERS
[illegible]	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER
[illegible]	D81	ACRES OR HECTARES
[illegible]	D82	GALLONS PER DAY OR LITERS PER DAY
[illegible]	D83	GALLONS OR LITERS
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR OR GALLONS PER HOUR OR LITERS PER HOUR
OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided: Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

DUP

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S02	600	G		5				
X-2	T03	20	E		6				
01	S01	110	G		7				
					8				
					9				
					10				

...SES (continued)

...SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE, INCLUDE DESIGN CAPACITY.

...DESCRIPTION OF HAZARDOUS WASTES

...EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. ...ndle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the ...s and/or the toxic contaminants of those hazardous wastes.

...STIMATED ANNUAL QUANTITY — For each listed waste entered in column A, ... the quantity of that waste that will be handled ... site. For each characteristic or toxic contaminant entered in column A, estimate the maximum total quantity of all the non-listed waste(s) that will be ... such possess that characteristic or contaminant.

...NIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

...facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure ... count the appropriate density or specific gravity of the waste.

...ROCESSES

...PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in ... to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process ... contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that ... that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" ... extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

...E: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be ... than one EPA Hazardous Waste Number shall be described on the form as follows:

Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total ... quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.

In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line ... "included with above" and make no other entries on that line.

Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

...PLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* — A facility will treat and dispose of an estimated 900 ... ...r of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two ... ...rrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an ... ...unds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X 0 5 4	900	P	T 0 3 D 8 0	
D 0 0 2	400	P	T 0 3 D 8 0	
D 0 0 1	100	P	T 0 3 D 8 0	
D 0 0 2				Included with above

ID NUMBER (from page 1)

C	D	0	0	2	2	2	1	4	3	0		

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DUP

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D.1)
1	D 0 0 3	900	P	501	
2	D 0 1 1				included ABOVE
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					

EPA Form 3510-3 (5-80)

CONTINUED

If you have a "C", etc. behind the "3" to identify ...

ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3

EPA I.D. NO. (enter from page 1)

YD000222143C

FACILITY DRAWING

PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)	LONGITUDE (degrees, minutes, & seconds)
42 6 05	76 48 47

FACILITY OWNER

A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. (area code & no.)
George P. Zurenda	607-733-9155

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
6 Strathmont Park	G Elmira	NY	14901

OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
George P Zurenda	[signature]	

OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
William Koscki	[signature]	11-11-80

EPA Form 3510-3 (6-80)

George P. Zurenda, President

Phone: (607) 733-5621

Industrial Service Corporation

ELECTROPLATING AND METAL FINISHING

926 STOWELL ST., ELMIRA, N.Y. 14901

October 25, 1983

Unites States Environmental Protection Agency
Region II
26 Federal Plaza
New York, New York 10278

Attention: Richard A. Baker, Chief
Permits Administration Branch

RE: I.D. #NYD002221430

Gentlemen:

Please consider this letter, and accompanying affidavit as a formal request for declassification or change in status for Industrial Service Corporation.

Industrial Service Corporation was a protective filer for our permit. We are in fact a generator of hazardous waste and we intend to continue as such.

We ceased any and all activities which would require a TSDF permit or that relate to Part 360, prior to March 31, 1983.

Industrial Service Corporation is in the electroplating and metal finishing business. The hazardous wastes which we generate are described as spent plating solutions with constituents primarily of heavy metals and cyanide solutions.

We have never been a generator of 1000 kilograms or more of hazardous wastes per month. Prior to March 31, 1983 we ceased accumulating and storing wastes in excess of this amount.

It is our understanding from conferring with NYS DEC's Mr. R. McDermott that this should be sufficient information to begin the delisting process.

Thank you for your prompt attention to this matter.

Sincerely,

INDUSTRIAL SERVICE CORPORATION

George P. Zurenda

George P. Zurenda
President

Dixon Rollins
Stored > 1000 kg, but
may be < 90 days
Evaporation of spent plating bath solution

FILE COPY

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

Thomas C. Jorling
Commissioner

February 3, 1989

Mr. Joseph C. Morgan
Vice President
Industrial Service Corporation
4 Nowlan Road
Binghamton, New York 13901

RE: Closure of Industrial Service Corporation

EPA Identification Number: NYD002221430

Dear Mr. Morgan:

This letter is to inform you that upon review of our records, the applicable regulatory requirements prior to closure of the above-referenced facility have been met and, hereby approval of the closure plan and public notice is granted.

Please note that this approval in no way precludes your responsibility to submit closure certification to this office as noted in the closure plan. It is deemed that closure of the referenced facility is not complete until such certification is received by this office.

If you have any questions regarding this notice, please contact Mr. Thomas Killeen at (518) 457-3274.

Sincerely,

James Sibbald Moran, P.E.
Chief, RCRA Program Support Section
Bureau of Hazardous Waste Program Development
Division of Hazardous Substances Regulation

cc: H. Mulholland - USEPA
D. Rollins, Region 8
J. Desai - Albany

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

Thomas C. Jorling
Commissioner

NOV 03 1989

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Mr. Joseph C. Morgan
Vice President
Industrial Service Corporation
4 Nowlan Road
Binghamton, New York 13901

RE: Closure of Industrial Service Corporation
EPA Identification Number: NYD002221430

Dear Mr. Morgan:

This letter is to confirm the receipt of owner/operator and independent professional engineer's certification dated August 7, 1989 of RCRA closure for this facility. We now consider this facility officially closed. Your authority to operate as a Treatment, Storage, and Disposal Facility (TSDF) is terminated.

Please be advised that the United States Environmental Protection Agency has determined that the corrective action provisions of the Hazardous and Solid Waste Amendments (HSWA) Section 3008(h) apply to all TSDF's which have acquired interim status.

The New York State Department of Environmental Conservation has established a program to evaluate the corrective action measures necessary at closed and closing facilities within the State. Once the corrective action provisions of HSWA have been met by the facility or determined not to be necessary at the facility, the facility can have their interim status terminated.

If you have any questions regarding your closure or regulatory status, please contact Mr. Thomas Killeen, of my staff, at (518)457-3274.

Sincerely,

James Sibbald Moran, P.E.
Chief
RCRA Program Support Section
Bureau of Hazardous Waste Program Development
Division of Hazardous Substances Regulation

cc: L. Livingston, USEPA
J. Gorman, USEPA
J. Desai
D. Rollins, Region 8