PRELIMINARY
RCRA FACILITY ASSESSMENT
TELEX COMMUNICATIONS, INC.
PITTSFORD, 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
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November 5, 1993

Mr. Paul Counterman
Chief, Bureau of Western Hazardous Waste Programs
Divisions of Hazardous Substance Regulation
New York State Department of Environmental Conservation
50 Wolf Road
Albany, NY 12233

Reference: Contract No. 68-W9-0003, TES-6
Work Assignment No. R02040
Preliminary RCRA Facility Assessment
New York State
(Ref. 1-635-393)

Subject: Deliverable: Preliminary RCRA Facility Assessment for Telex Communication - EPA ID No. NYD002205987.

Dear Mr. Counterman:

At the request of the U.S. Environmental Protection Agency, enclosed for your review is one copy of the Preliminary RCRA Facility Assessment Report for the above referenced facility. Comments and additional information should be submitted to Mr. John Nevius, U.S. EPA Work Assignment Manager. Due to contractual requirements between EPA and TRC, it is requested that your review be expedited in order to incorporate your comments by our December 2, 1993 contract expiration. Any efforts by NYSDEC to meet this date would be greatly appreciated.

Mr. Nevius' address is as follows:

Mr. John G. Nevius
Work Assignment Manager
U.S. Environmental Protection Agency
Air and Waste Management Branch
(2AWM-HWF-Room 1037)
26 Federal Plaza
New York, NY 10278

Questions concerning this submission should be directed to Mr. Nevius at (212) 246-9578, or the undersigned at (212) 349-4616.

Very truly yours,

Michael F. Clark, P.E.

cc: John Nevius/EPA Work Assignment Manager (w/o)
Douglas Sullivan/TRC TES-6 Regional Manager (w/o)
Dixion Rollins/NYSDEC-Region 8-Hazardous Substance Engineer (w)
TES ZPMO

PRELIMINARY
RCRA FACILITY ASSESSMENT
TELEX COMMUNICATIONS, INC.
PITTSFORD, 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.:	NYD002265987
Contract No.:	68-W9-0003 (TES-6)
TRC Document No.:	NY-R40.RP9
TRC Project No.:	1-635-393-3-2000-0
TRC Project Manager:	Michael F. Clark, P.E.
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Subcontractor:	N/A
Subcontractor No.:	N/A
Subcontractor Project Manager:	N/A
Telephone No.:	N/A
EPA Work Assignment Manager:	John Nevius
Telephone No.:	(212) 264-9578
Date Prepared:	October 8, 1993

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TRC

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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 Telex Communications Incorporated (TCI) facility, Pittsford, New York (EPA I.D. No. NYD002265987). Tasks were performed in accordance with the Preliminary RFA Scope of Work provided by EPA on June 8, 1993, and TRC's 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) 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 Interim 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.

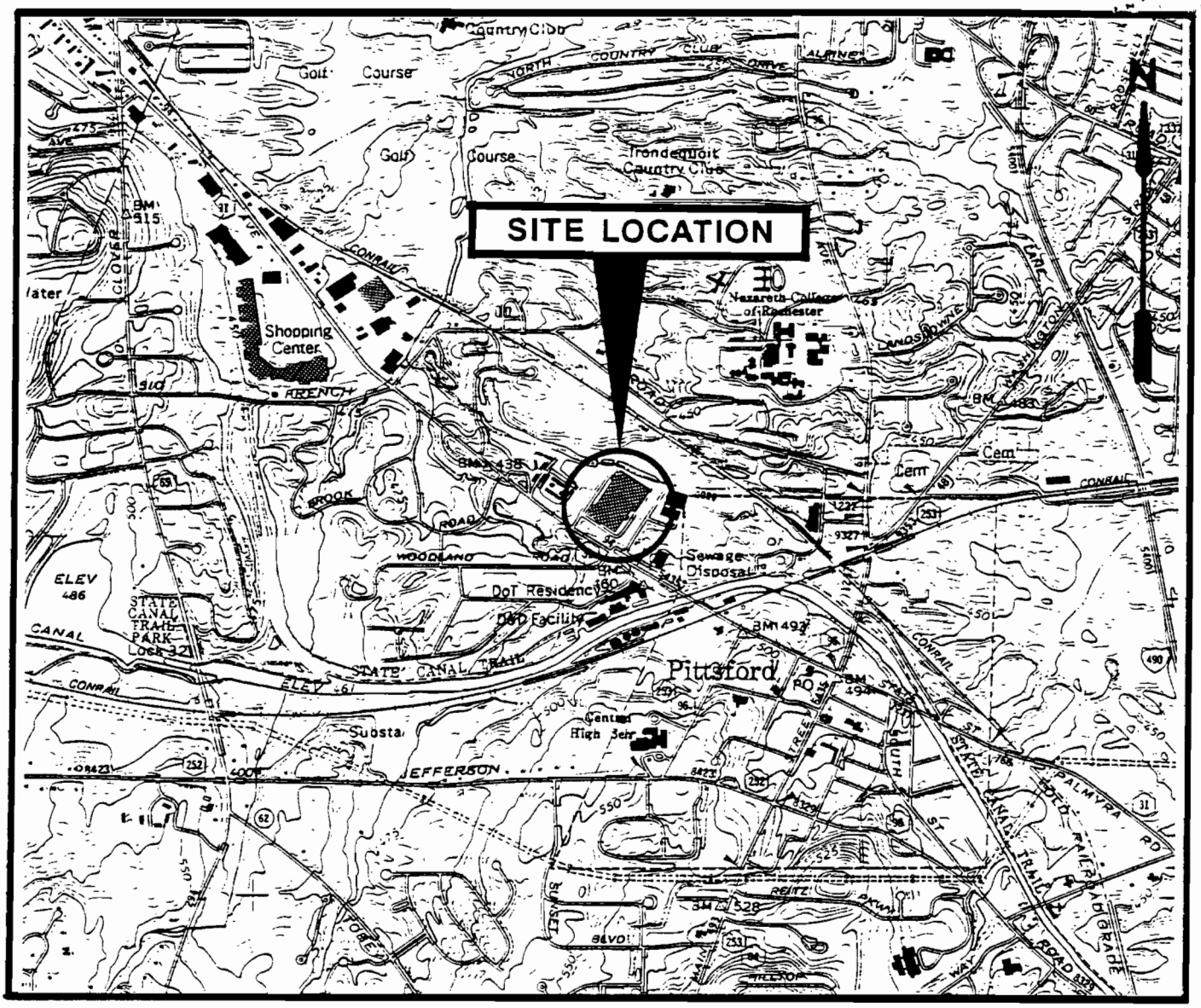
A review of EPA files was not conducted, at the request of the Work Assignment Manager (WAM). A Visual Site Inspection (VSI) was conducted by TRC on September 22, 1993.

2.0 FACILITY DESCRIPTION

TCI operated at 3750 Monroe Avenue in Pittsford, Monroe County, New York from 1982 to 1985. The property is approximately 20 acres and is located in a residential/commercial setting. The area of the building is estimated at 300,000 square feet. Surrounding the building is a paved parking area separated from the building by a grassed landscape buffer. The Site Location Map is included as Figure 1.

The topography is relatively flat. The property is bordered by an apartment complex to the northwest; Monroe Avenue to the southwest; an office complex to the southeast; and Allen Creek to the northeast.

TCI purchased the manufacturing of audio and video equipment from the Singer Company in 1982. Processes included machining, stamping, painting, plating, and assembly. The current owner is 3750 Monroe Avenue Associates and the building is leased to three businesses. One of the tenants, Somerville Paper, is a large quantity



SCALE 1:24000

1 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 .5 0 1 KILOMETER

Magnetic declination for 1980 is approximately 10½°West

QUADRANGLE LOCATION

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

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

TELEX COMMUNICATIONS, INC.
3750 MONROE AVENUE
ROCHESTER, N.Y.

SITE LOCATION MAP

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

WORK ASSIGNMENT NO. R02040

generator under RCRA regulation. The other tenants, Moscom and Adtech have assembly and light manufacturing operations (TRC, 1993).

A Corrective Action Prior to Loss of Interim Status Report (CAPT LOIS), prepared by PRC Environmental Management, Inc. dated June 22, 1988, for EPA identified four SWMUs:

SWMU #1 - Hazardous Waste Drum Storage Area
SWMU #2 - Wastewater Treatment System
SWMU #3 - Plating Area
SWMU #4 - Stripping and Degreasing Operation Area.

AOC #1, hazardous waste drum storage area (SWMU #1), was located inside a TCI stock room. Trichloroethene (TCE) solvent generated from degreasing operations was stored in 55-gallon drums inside the plant building. The paved concrete storage area measured 15 x 15 feet (CDM, 1988). No floor drains were located in this area.

AOC #2, the wastewater treatment system (SWMU #2), was located outside the plant building. The treatment system consisted of one sump pump, two in-ground 15,000-gallon concrete tanks, and three partially-inground concrete sedimentation tanks. Wastewater generated from the plating operations was collected and treated and then discharged into the sanitary sewer system.

AOC #3, the plating area (SWMU #3), consisted of 54 125-gallon tanks used to plate steel and aluminum parts for slide and movie projectors. The plating area was partially covered with brick and concrete. During the CAPT LOIS inspection some brownish soil was noticed on a concrete pad outside of the plating area. During TRC's VSI this area was used by Moscom as an assembly area for computer chassis. The floor is tiled and there was no evidence of deterioration or staining.

AOC #4 was the stripping and degreasing operation area (SWMU #4). The waste previously managed at SWMU #4 included waste acid, caustic, and spent TCE solvent wastes generated from stripping and degreasing operations. The wastes solutions were transferred to 55- gallon drums and then shipped off site for disposal.

During the VSI, one additional SWMU was identified. **AOC #5**, the hazardous waste storage room, is managed by and located on the premises of Somerville Paper. Information pertaining to this SWMU was not provided by the file search (TRC, 1993). This hazardous waste storage room stored waste solvents, ink, non-regulated waste and mineral spirits. This storage area is approximately 20 feet by 20 feet with a concrete floor and an 8-inch berm. This is a separate room with a double door for access (TRC, 1993).

No evidence of past releases were reported by the facility, or noticed by the site inspection in 1988 (CDM, 1988). No evidence of release was observed by TRC during the VSI (TRC, 1993).

Summaries of the SWMUs are located in Table 1. Figure 2 identifies the approximate locations of the SWMUs.

3.0 FACILITY ACTIVITY/HISTORY

The property was originally owned and operated by Singer, Inc. It is not known when Singer, Inc. purchased the property. The operations at Singer, Inc. were similar to the TCI operation. TCI operated this facility from 1982 to 1985. Singer, Inc. submitted a RCRA Part A permit application and obtained interim status for a drum storage area and a landfill. However, neither Singer, Inc. or TCI ever operated a landfill on site (CDM, 1988).

TCI manufactured audio and video equipment, such as 16-millimeter movie projectors and 35-millimeter slide projectors. Processes included machining, stamping, painting, plating, and assembly. Information pertaining to these processes was not provided in the files. Wastes generated from these processes were stored inside the plant building. The wastes were stored for less than 90 days.

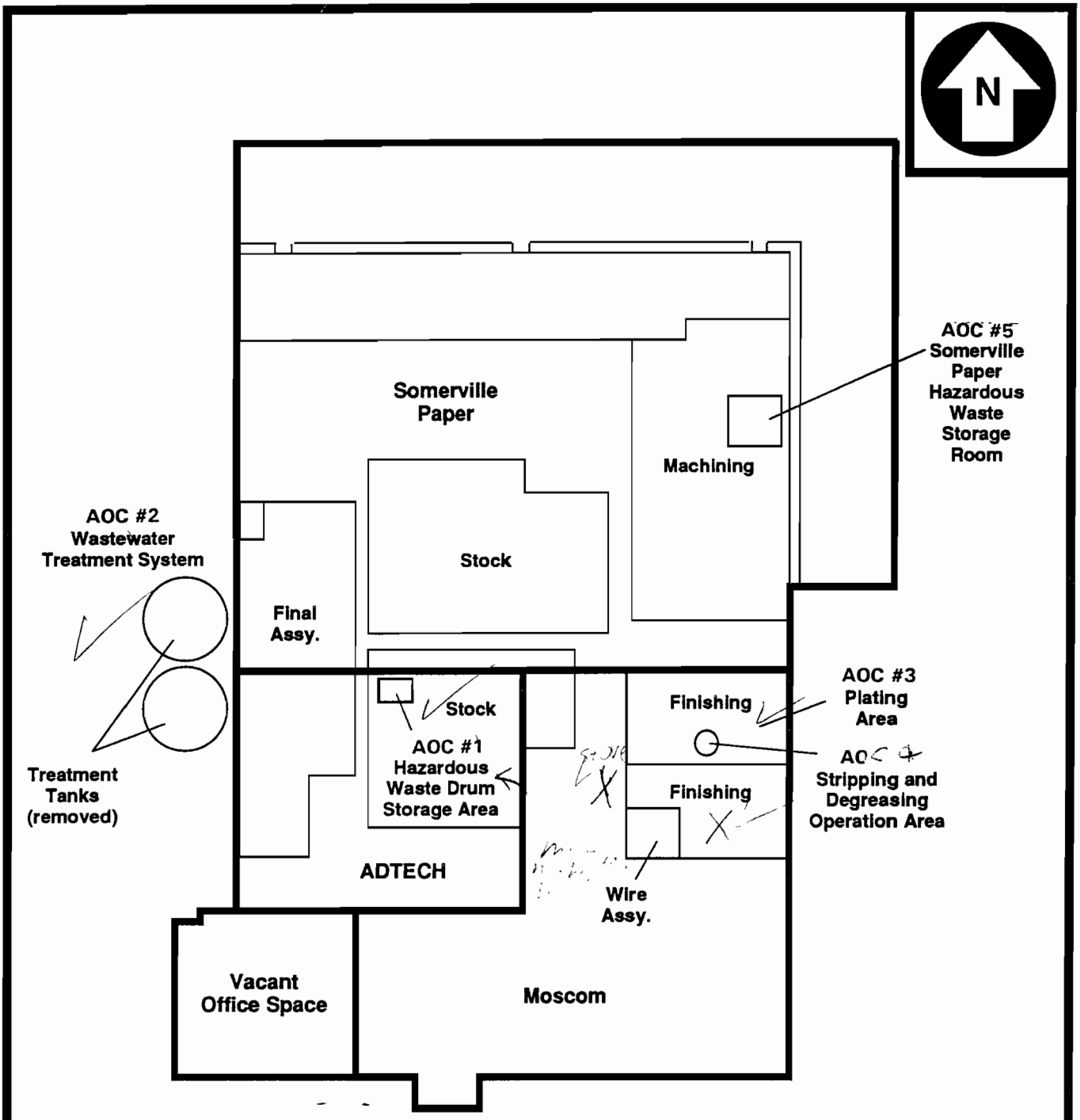
The waste was stored less than 90 days at AOC #1. Other wastes known to have been stored in this area include waste paint and solvent wastes generated from painting operations, and solids generated from the plating lines. Waste oil was also stored in AOC #1 (CDM, 1988).

TCI stated during the site visit conducted by CDM in 1988 that no releases had occurred at AOC #1. There was no evidence of releases observed during TRC's site visit. AOC #1 was closed in 1985 (CDM, 1988). This area did not show any sign of staining during TRC's VSI (TRC, 1993).

At AOC #2, wastewater generated from the plating operations was collected and treated before being discharged into the sewer system. Treated wastes were F006 (wastewater treatment sludge) and P098 (potassium cyanide). The wastewater generated from the plating room was piped to the sump pit of the treatment system through an underground concrete pipe. The wastewater was then pumped into 15,000-gallon tanks for pH adjustment and cyanide destruction. Then the wastewater was pumped into sedimentation tanks, where the solids settled out. The effluent was then discharged into the sanitary sewer system. The solids in the tank were periodically pumped out and disposed of off site.

TABLE 1. AOC SUMMARY						
AOC	**AOC Description**	**Start-up/ Closure Dates***	**Release Potential**	**References**	**Medium/ Compounds Detected**	**Off-Site Migration Potential**
#1 Hazardous Waste Drum Storage Area	Concrete pad measuring 15 feet by 15 feet. No floor drains.	1982-1985	Low	CDM, 1988	None	None
#2 Wastewater Treatment System	Sump pump, two in-ground concrete tanks (15,000 gallons each) and three partially in-ground sedimentation tanks	1982-1985	Low	CDM, 1988	None	None
#3 Plating Area	54 125-gallon tanks Brick and concrete floor.	1982-1985	Low	CDM, 1988	None	None
#4 Stripping and Degreasing Operation Area	No description provided.	1982-1985	Low	CDM, 1988	None	None
#5 Hazardous Waste Storage Room (Somerville Paper)	Approximately 20 feet by 20 feet enclosed room with concrete floor and 8-inch berm.	Unknown/ Operating	Low	TRC Site Visit	None	None

*The entire facility was determined officially closed in 1987.



Monroe Avenue

TRC Environmental Corporation

TELEX COMMUNICATIONS, INC.
ROCHESTER, NY

Notes: This Site Plan is for Illustrative Purpose Only.

This Illustrates the Building Layout when TCI was in Operation.

▬ Delineates Current Tenant Area of Occupancy.

Not to Scale

SITE PLAN

Date: 9-21-93	Proj.# 1-635-393	Fig. 2.

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MS73/1/X

The concrete tanks and sump pit were excavated in 1986. An independent professional engineer certified the tank closure. The drains to and from the wastewater treatment system were plugged or removed. The area was remodeled and landscaped (CDM, 1988). This area did not show any evidence of stressed vegetation (TRC, 1993).

The wastes managed at AOC #3 were mostly chromium plating, nickel plating, and copper plating generated from plating operations. During the site visit in 1988, staining was observed on the concrete pad outside the plating area. According to TCI, the concrete pad was used to host a cyclone to control the air emissions from the plating operation. However, TCI never used the cyclone, and it was removed during the closure (CDM, 1988). This area is currently used by Moscom for assembly of computer's and research and development. The floor is tiled and there were no signs of deterioration (TRC, 1993).

Details regarding the stripping and degreasing operations were not available. It is known that the stripping operation involved washing parts with acid and caustic solutions (CDM, 1988).

The site inspection performed in 1988 for the CAPT LOIS report confirmed that the SWMUs have been closed and no evidence of releases were observed (CDM, 1988). No evidence of release was observed during TRC's VSI (TRC, 1993).

During closure, the Hazardous Waste Drum Storage Area (AOC #1) floor was washed, the tile removed, and the waste disposed of off site. All plating wastes stored in the Plating Area were analyzed, sorted, and disposed of off site (CDM, 1988).

The additional AOC identified during the TRC VSI is located in Somerville Paper. This hazardous waste storage room stored waste solvents, ink, non-regulated waste and mineral spirits. This storage area is approximately 20 feet by 20 feet with a concrete floor and an 8-inch berm. This is a separate room with a double door for access (TRC, 1993).

4.0 ENVIRONMENTAL SETTING

No information pertaining to the environmental setting was found in the files. The location of the facility is in Pittsford, NY and all properties in the area utilize the Monroe County public water supply.

Runoff from the site is directed into catch basins, which discharge into Allen Creek, located off the property.

5.0 PRELIMINARY EVALUATION

Preliminary information for this evaluation is provided in Table 1. The data provided includes the following: AOC description, start-up/closure dates, release potential, source reference, medium/compounds detected and off-site migration potential. No analytical data for the site was available (CDM, 1988).

Data gaps were noted during the preliminary file review. Specifically, the following items of information are necessary if further evaluation of the facility is required:

- Environmental and geological information including the setting of the facility,
- Information regarding the stained soil observed on the concrete pad, during the site inspection conducted in 1988,
- The approved closure plan,
- An as-built plan showing the complete TCI operation, and
- Information regarding property transfer and ownership.

This information should be collected and reviewed before evaluating this site.

6.0 SUMMARY

TCI manufactured audio and video equipment, such as 16-millimeter movie projectors and 35-millimeter slide projectors. Processes included machining, stamping, painting, plating, and assembly. TCI was located at 3750 Monroe Avenue in Pittsford, NY. The current owner of the premises is the 3750 Monroe Avenue Associates (TRC, 1993).

TCI has no evident releases, and the operation was certified closed by a professional engineer. The four AOCs have been closed, and the facility has been determined officially closed by NYSDEC. An additional AOC was identified during TRC VSI. This AOC is active and used by Somerville Paper. Somerville Paper is listed as a large quantity generator under RCRA regulations (TRC, 1993).

A CAPT LOIS inspection was conducted in 1988. The facility was considered officially closed by NYSDEC in 1988.

REFERENCES

CDM, 1988. Corrective Action prior to Loss of Interim Status Report, Telex Communication, Inc., Monroe Avenue, Rochester, NY, prepared by PRC Environmental Management, Inc. under contract with CDM Federal Programs for U.S. EPA, June 22, 1988.

TCI, 1985. Letter from John J. Cinelli, Telex Communications Incorporated, Plant Manager, to NYSDEC, Region 8 Headquarters, February 13, 1985.

TCI, 1984. Letter with attached manifests and facility layout sent by Richard W. Bacchetta, Telex Communications Incorporated, to the County of Monroe, Department of Pure Waters, June 27, 1984.

TRC, 1993. TRC site visit on September 22, 1993.

APPENDIX A

RCRA FACILITY ASSESSMENT (RFA) CHECKLIST

TRC

PRELIMINARY RCRA FACILTY ASSESSMENT

PRELIMINARY REVIEW CHECKLIST

WORK ASSIGNMENT NO. R02040

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: Plating Facility

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

Comments:

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

Comments:

D. SWMU identification list: ✓P ___NP ___A ___NA

Comments:

E. Was the SWMU subset of RCRA regulated units denoted? ___Y ___N ___A ___NA

Comments:

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:

H. Detailed SWMU or AOC information:

SWMU # 1 or AOC Hazardous Waste Drum Storage Area

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

Comments: _____

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

Comments: 15 x 15 concrete pad, no drains

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

Comments: less than 90 day storage, spent TCE, waste paint, waste paint thinners

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: _____

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: _____

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: _____

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:_____

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:_____

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: This area was closed in 1985. The closure certification was not available. More information is needed.

b. Is the recommendation acceptable? ___Y ___N

Comments:_____

5. SWMU # 1 or AOC Hazardous Waste Storage Drum Area

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

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

Comments: This area was a unit for [illegible] shows not [illegible] [illegible] of [illegible]

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: The unit [illegible]

iv. Visual evidence of release (e.g. discolored soils, dead vegetation): __P __NP ✓Not applicable

Comments: _____

v. Visual evidence of exposure potential (e.g. swamp, drinking water wells): __P __NP ✓Not applicable

Comments: _____

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

Comments: _____

5. SWMU # 2 or ~~AOC~~ Waste water Treatment System

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 area has been removed and current area is grassed.

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: No signs of migration pathways were noted during VSI

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

Comments: No evidence of release was noted during VSI

v. Visual evidence of exposure potential (e.g. swamp, drinking water wells): __P __NP ✓Not applicable

Comments: _____

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

Comments: _____

5. SWMU # ___ or AOC Satellite Hazardous Waste Storage

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 room is located in the rear of the [illegible] with [illegible] access and [illegible] main.

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

Comments: This room stored waste solvents, non-regulated waste, mixed [illegible] and waste oils.

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

Comments: No evidence of pollutant migration pathways were noted.

iv. Visual evidence of release (e.g. discolored soils, dead vegetation): __P __NP ✓Not applicable

Comments: _____

v. Visual evidence of exposure potential (e.g. swamp, drinking water wells): __P __NP ✓Not applicable

Comments: This area is indoors.

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

Comments: _____

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: ______________________________

D. Other comments on the VSI: The sumps identified in the CAPT Lois were removed and currently there is no evidence of [illegible] backfill. [illegible] [illegible] was noted due to the fact that it is [illegible] [illegible] [illegible] [illegible] [illegible] [illegible]

H. Detailed SWMU or AOC information:

SWMU # 2 or AOC Wastewater Treatment System

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

Comments: _____

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

Comments: _____

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

Comments: Waste (potassium cyanide) P098 and F006 class

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: _____

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: _____

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: _____

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: Permit No. NY0006734. Discharged non contact cooling water and storm water to Allen Creek.

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: _____

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: Closure Certification is not available. More information is needed. Officially closed in 1995.

b. Is the recommendation acceptable? ___Y ___N

Comments: _____

H. Detailed SWMU or AOC information:

SWMU # 3 or AOC Plating Area

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

Comments: _____

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

Comments: During plating operation the floor is made of brick.

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

Comments: Chromium, nickel and Copper plating.

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: They had 19 air immission point source permits (Ne. 2644-00-0365-xx1)

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: Concerned about the brick floor. Per CAPT Lewis, stained soil was observed outside the plating area on the concrete pad.

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: Same as above. Environmental setting is 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: ______________________________

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: ______________________________

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: Closure Certification not available. More informat. is needed on the occurrence of the release, cleanup / testing and the environmental setting.

b. Is the recommendation acceptable? ✓ Y ___N

Comments: ______________________________

5. SWMU # 2 or ~~AOC~~ Plating Area

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

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

Comments: This area is used as an assembly area. The unit is [illegible]

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: This was observed [illegible]

iv. Visual evidence of release (e.g. discolored soils, dead vegetation): __P __NP ✓Not applicable

Comments: _____

v. Visual evidence of exposure potential (e.g. swamp, drinking water wells): __P __NP ✓Not applicable

Comments: _____

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

Comments: _____

5. SWMU # 4 or AOC stripping and concrete pipeline

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

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

Comments: This area was removed.

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: [illegible]

iv. Visual evidence of release (e.g. discolored soils, dead vegetation): __P __NP ✓Not applicable

Comments: _____

v. Visual evidence of exposure potential (e.g. swamp, drinking water wells): __P __NP ✓Not applicable

Comments: _____

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

Comments: _____

I. Did the PR identify any data gaps? ✓ Y ___ N ___ A ___ NA

a. If "Y", list the data gaps: Environmental setting information, Closure Plans

Comments:

J. Other comments on the PR:

The soils do not give an indication as to how these areas were cleaned, as the testing that was performed to ensure that a release has not occurred. The structure of the bush also should be further researched. The soils give no indication of the environmental setting.

There is a apparent sense that areas were "cleaned up" and closed up, but the documents were never analyzed.

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RFA Component 2: Visual Site Inspection (VSI)

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

Comments: The VSI consisted of a [illegible] to view the [illegible] [illegible] the [illegible] [illegible] report

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

Comments:

C. Facility inspection:

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

   Comments:

2. Was each ACC noted in the PR examined? __Y ✓N

   Comments: The only [illegible] [illegible] [illegible] [illegible]

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

   Comments:

   a. Were additional SWMUs and/or ACCs noted ? ✓Y __N

   Comments: Somerville Paper Co. a tract of 3250 is listed as a large quantity generator. At VSI of [illegible] hazardous waste storage area was conducted

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

   Comments:

H. Detailed SWMU or AOC information:

SWMU # 4 or AOC Stripping and Degreasing Operations

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

Comments:_____

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

Comments:_____

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

Comments:_____

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:_____

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:_____

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:_____

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:_____

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:_____

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: has been inactive since 1985. Doesn't say if it was ever in use closed. Need more information.

b. Is the recommendation acceptable? ✓Y ___N

Comments:_____