

CDM FEDERAL PROGRAMS CORPORATION March 2, 1990

Derval Thomas
Regional Project Officer
U.S. Environmental Protection Agency
26 Federal Plaza
New York, New York 10278

PROJECT:

TES V, EPA CONTRACT NO: 68-W9-0002

DOCUMENT NO:

TES5-R02013-EP-BNHT

SUBJECT:

Final Report for EPA Work Assignment RO2013

Corrective Action Prior to Loss of Interim Status

Corning Glasworsk - Steuben Plant

Corning, New York

Document Control No: TES5-R02013-FR-BNHS

Dear Mr. Thomas:

Please find enclosed the Final Report entitled, "Corrective Action Prior to Loss of Interim Status, Corning Glasworsk - Steuben Plant, Corning, New York", as fulfillment of the reporting requirements for this work assignment.

If you have any comments regarding this submittal, please contact me at (212) 393-9634 within two weeks from the date of this letter.

Sincerely,

CDM Federal Programs Corporation

Scott B. Graber

TES V Regional Manager

SA/CAT

Enclosure

Argaret Emile, EPA Primary Contact, RCRA Region II

Zachary Garripoli, EPA HQ Coordinator, RCRA Region II

J. Steven Paquette, CDM Federal Programs Corporation, Deputy
Program Manager (letter and cover only)
Mary Daup, EPA Contracting Officer (letter only)
Pamela Hillis, Versar, Inc. (letter only)
Document Control, CDM Federal Programs Corporation (2 copies)

(TV19/74)

(Master 6)

FINAL REPORT CORRECTIVE ACTION PRIOR TO LOSS OF INTERIM STATUS CORNING GLASSWORKS - STEUBEN PLANT CORNING, NEW YORK

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY Office of Waste Programs Enforcement Washington, D.C. 20460

EPA Work Assignment No. : R02013

EPA Region : II

 Site No.
 : NYD00824359

 Contract No.
 : 68-W9-0002

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Prepared By : CDM Federal Programs Corporation

Work Assignment Project Manager
Telephone Number
Primary Contact
Telephone Number
: (212) 393-9634
: Margaret Emile
: (212) 264-5175

Date Prepared : March 2, 1990

(TV19/74)

(Master 6)

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1.0 INTRODUCTION

CDM Federal Programs Corporation (FPC) received a Work Assignment No. R02013 from the U.S. Environmental Protection Agency (U.S. EPA)
Region II (U.S. EPA Contract No. 68-W9-0002) to conduct corrective action prior to loss of interim status (CAPT LOIS) inspections in the State of New York. Versar, Inc., under subcontract to FPC, accepted this work assignment to prepare preliminary reports for each facility, conduct the inspections, and prepare final inspection reports for each facility.

Versar started this work under TES III (Contract No. 68-01-7331, WA No. R02002) but did not finish because the contract expired. Versar completed the inspections under the old contract but prepared the reports under the new contract. Versar conducted 20 CAPT LOIS inspections.

The purpose of the CAPT LOIS inspection is to determine if releases have occurred at Resource Conservation and Recovery Act (RCRA) facilities and, if so, whether the releases have been adequately remedied. These inspections are conducted as part of the process for terminating interim status at RCRA facilities. The CAPT LOIS inspection is similar to a RCRA facility assessment (RFA) and consists of (1) a file review, similar to a preliminary review, and (2) a site visit, similar to a visual site inspection (VS1). However, unlike an RFA, a CAPT LOIS does not include sampling.

Versar conducted a CAPT LOIS inspection of the Corning Glassworks - Steuben Plant facility in Corning, New York. Prior to conducting the site inspection, Versar completed a file review and prepared a Preliminary Report summarizing the facility operations and solid waste management units (SWMUs) at the facility.

The site inspection at the Steuben Plant facility was conducted on June 8, 1989 by Ken Barry and Robert Marbury of Versar. Versar was accompanied by Joseph Kane, Senior Environmental Control Engineer and Tim Scouten, Plant Engineer of Corning. The objective of the site inspection

was to verify information obtained in the file review, determine the status of known SWMUs, identify any new SWMUs and other areas of concern, and obtain evidence of release(s) from SWMUs or areas of concern. This inspection report describes the facility's operational and waste management practices, discusses the SWMUs, and provides recommendations for terminating the facility's interim status. Photographs taken during the site inspection are provided in the attachment.

Pertinent facility information is provided below:

Facility Name:

Corning Glassworks - Steuben Plant

U.S. EPA I.D. No.:

NYD000824359

Address:

Fulton Street

Corning, New York 14838

Facility Contact:

Joseph Kane

Senior Environmental Control Engineer

Telephone Number:

(607) 974-6568

2.0 FACILITY DESCRIPTION

The Corning - Steuben Plant, located at Fulton Street in Corning, New York, occupies approximately 21,000 square feet and manufactures Steuben Crystal. The adjacent Fulton Street facility, which occupies approximately 7,100 square feet, manufactures mills, hand frames, bridge ports, and blanchard machines.

The facility operations produce lead-containing waste materials including glass fines, aluminum oxide, pumice, cerium oxide, and carborundum. The waste materials are a result of grinding and polishing.

The solid waste management unit (SWMU) identified during the pre-site visit research and during the site visit are illustrated on Figure 1. The SWMU and other areas of interest are discussed in Sections 3.0 and 4.0, respectively, of this report.

On November 20, 1985 Corning submitted to New York State Department of Environmental Conservation (NYSDEC) a closure plan for the Steuben Plant facility. NYSDEC granted approval of Corning's Closure Plan for the facility and granted generator only status in a letter dated December 31, 1985. Corning requested Part B denial/Part A withdrawal from U.S. EPA in a letter dated January 16, 1986. EPA reclassification is pending.

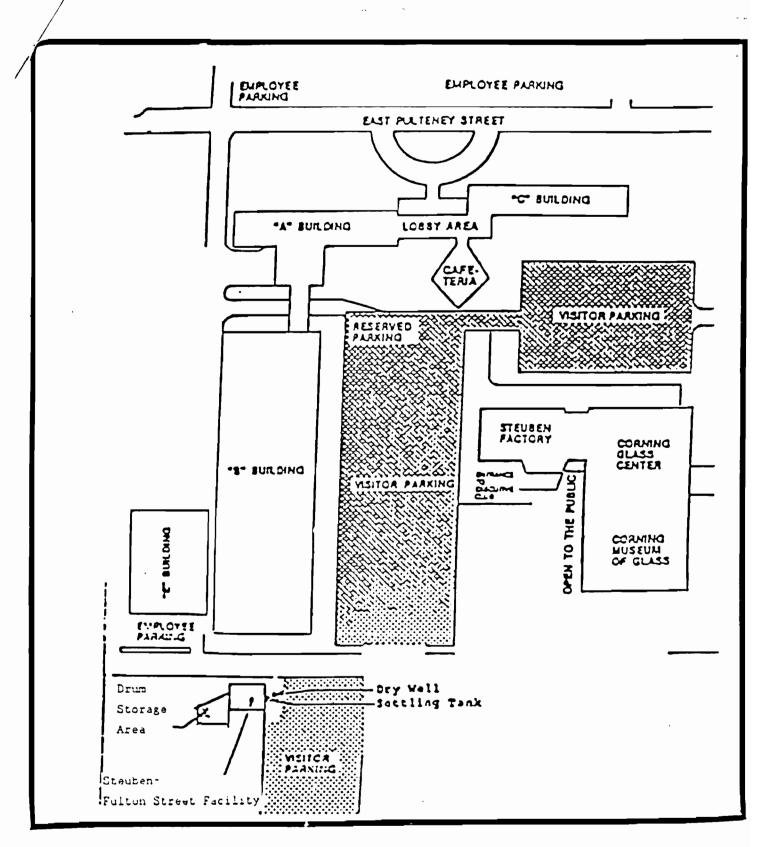


FIGURE 1
FACILITY LAYOUT

3.0 SOLID WASTE MANAGEMENT UNITS

One SWMU was identified as a result of the file review and the site visit. This SWMU is the drum storage area at the Steuben-Fulton Street plant. The SWMU is described in the paragraphs below.

3.1 <u>Drum Storage Area</u>

Description

The drum storage area is situated outside the Steuben Plant adjacent to the Fulton Street facility. Grinding sludge is stored in 55-gallon drums. The storage area is paved and diked. At the time of the site visit, 21 drums of waste sludge were stored onsite. The drums are placed on wooden pallets (see Attachment, Photograph 3). Seven drums of lube oil (new product) were also stored in this area, but segregated from the drums of hazardous waste. Standing water from recent rainfall was observed on part of the waste storage pad; impact to the drums is not anticipated since the drums are stored on pallets.

<u>Status</u>

Active. The drum storage area has been used by Corning since 1980.

Waste Type

Waste is composed of glass fines, carborundum, aluminum oxide, pumice, and cerium oxide. The waste is a characteristic hazardous waste because of its leachable lead concentration using the Extraction Procedure (EP) Toxicity method.

Waste Management

Waste is collected from machines and sumps (see Attachment, Photograph 2), placed in 55-gallon drums (see Attachment, Photograph 1), and stored in the secured storage area (see Attachment, Photograph 3).

Known and Suspected Releases

No releases were reported to have occurred in the drum storage area, nor is there evidence that a release has occurred. The drum storage pad is in good condition.

4.0 AREAS OF CONCERN

No other areas of concern were identified during the site visit.

5.0 SUMMARY AND CONCLUSIONS

One SWMU was identified during the site visit. Corning reported no release from the SWMU and Versar observed no evidence of a release. Wastewater and non-contact cooling water are discharged to the sanitary sewer and via NPDES permit No. NY0087076.

Wastes are collected in accordance with the satellite accumulation regulations. The unit observed appears to be structually sound with spill containment provisions. NYSDEC has approved the facility's closure plan and granted generator only status for this facility. EPA reclassification of the facility to generator only status is pending.

6.0 REFERENCES

- Corning, 1985. Facility Closure Plan, Corning Glassworks, Steuben-Fulton Street Facility, EPA I.D. No. NYD000824359. Transmittal letter dated November 20, 1985, to Randy McDermott, Regulatory Fee Determination Unit, New York Department of Environmental Conservation, from Susan McLaren, Energy and Environmental Control, Corning Glassworks.
- Corning, 1986. Letter dated January 16, 1986 to Richard Baker, Permits Administration Branch, U.S. Environmental Protection Agency from Susan McLaren, Energy and Environmental Control, to Corning Glassworks. Subject: Request for Part B denial/Part A withdrawal.
- Corning, 1987. Solid Waste Management Unit Questionnaire (Facility Characterization Form) for the Corning Glassworks, Steuben-Fulton Street facility. Transmittal letter dated March 11, 1987, to Management Division, U.S. EPA Region 2 from Susan McLaren, Environmental Control, Corning Glassworks.
- NYSDEC, 1985. Letter dated December 31, 1985, from John L. Middelkoop, P.E., Permits Section, Bureau of Hazardous Waste Technology, New York Department of Environmental Conservation to Susan McLaren, Energy and Environmental Control, Corning Glassworks. Subject: Approval of facility closure plan.
- NYSDEC, 1986. New York State Industrial Hazardous Waste Management Act Inspection conducted at the Corning Glassworks, Steuben Plant.
 Inspection conducted on March 20, 1986 by Stephen Betts of NYSDEC.
- Corning, 1989a. Conversation with Mr. Joseph Kane of Corning during site visit June 8, 1989.
- Corning, 1989b. Conversation with Mr. Tim Scouten of Corning during site visit June 8, 1989.

APPENDIX
PHOTOGRAPHS TAKEN DURING SITE VISIT



Photograph 1 - Plastic bags of batch dust stored in 55-gallon drum (approximately 2-3 weeks to fill drum)



Photograph 2 - Sumps in plant contain Pb sludge. Sludge is placed in drums.



Photograph 3 - Drum Storage Area for Steuben, across street at Fulton Street Building (21 drums glass dust sludge, 7 drums lube oil (1 TCE))

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



May 26, 1989

Mr. Blake D. Manuel Senior Environmental Control Engineer Corning Glass Works Corning, New York 14831

Dear Mr. Manuel:

Our records indicate that the above referenced facility has interim status as a treatment, storage, or disposal facility (TSDF) in New York State, but has ceased operating in that capacity without following the closure process required by RCRA or 6NYCRR Part 373-3.

We have been asked to clarify the exact status of this facility. Under both Federal and New York State hazardous waste regulations there are no provisions for the future closure of a TSDF. Our legal authority to accept this practice has been questioned. EPA Region II questions the status of this facility with regard to the corrective action provisions of Hazardous Solid Waste Amendments of 1984 (HSWA). The legal counsel for the Regulatory Fee Unit has questioned why this facility is not subject to TSDF regulatory fees.

I would, therefore, suggest that you implement the closure plan for this facility prior to the issuance of regulatory fee bills this summer. We would be happy to discuss this letter and aid you in completing the reclassification of this facility. Please call me 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