The electronic version of this file/report should have the file name:

Type of document . Site Number . Year-Month . File *Year-Year* or Report name . pdf

letter. ~~hw902004 . 1992-08~~ .CorrespondenceFile_____.pdf

example: *letter . Site Number . Year-Month . CorrespondanceFileYear-Year . pdf*

report. hw 902004 . 1992-08. Leachate Invest Rpt .pdf

example: *report . Site Number . Year-Month . ReportName . pdf*

if a non-foilable site: add ".nf.pdf" at end of file name

Project Site numbers will be proceeded by the following:

Municipal Brownfields - B
Superfund - HW
Spills - SP
ERP - E
VCP - V
BCP - C

Tom Levandowski
Jim Voelth

Director for FRM

Sorting on leachate

3 Areas
152 Drainage leachate good
3 Areas smelling not leachate produced

Areas
152 :
FRM Action should be consulted w/ R.A.
Maps pts looking at
① most likely cap alt - ⊗
a partial cap as FRM will not signif reduce leachate
② looking at some way to intercept GW to ↓ leachate production doesn't see any reason

③ Does it make sense to do anything w/ leachate generated
- lower pump station is inoperable w/o pump 20,000 gal/day
overflow of 2
with water 500 gal/min or 3/4 mill gal/day

500 gal/min transfer pump to truck

30,000 gal/day Wellsville removing in tanker truck

overflows on south side into stream

T.L.

Will call Wellsville about leachate overflow

Chris:

Phase II should give enough data to design a ready at site

- effectiveness of cap
- g.w. intrusion of landfill

? as to what is going on at landfill hydrologically

How much H2O is passing thru fill.

Need to look at

① benefit in consolidating waste in one area

② need to control source

Don't know how to reduce generation of leachate

ML

STATE OF NEW YORK
DEPARTMENT OF HEALTH

Center for Environmental Health 2 University Place Albany, New York 12203-3399

Mark R. Chassin, M.D., M.P.P., M.P.H.
Commissioner
Paula Wilson
Executive Deputy Commissioner

OFFICE OF PUBLIC HEALTH
Sue Kelly
Executive Deputy Director
William N. Stasiuk, P.E., Ph. D.
Center Director

August 28, 1992

Ms. Marcia Ladiana
Environmental Engineer
Bureau of Hazardous Waste Remediation
NYS Dept. of Environmental Conservation
50 Wolf Rd., Room 222
Albany, NY 12233

RE: Wellsville Andover Landfill
Wellsville and Andover
Allegany County
ID #902004

Dear Ms. Ladiana:

I have reviewed the July 1992 Leachate Investigation Report for the referenced site and have the following comments:

1. Section 3.2, Effluent Quality. This section discusses the treatment of the effluent for the purpose of meeting the SPDES permit requirements, and that the Waste Water Treatment Plant (WWTP) has difficulty "treating other constituents". Please provide more detail regarding what the constitutents are and the difficulty in treating these constituents.

2. Section 4.1.2, On-Site Leachate Treatment. More information is needed regarding biological treatment. Will the bacteria to be utilized for treatment be able to survive during flow rate variation?

3. Long term advantages/disadvantages should be evaluated for each Interim Remedial Alternative for leachate treatment. My concern with alternative number 2 is that once the landfill is remediated, on-site leachate treatment may not be necessary. Consideration should be given to upgrading the current WWTP so that additional leachate could be accepted in lieu of building a treatment facility onsite. I concur with the proposal to construct an additional leachate collection pond, and to repair any leachate collection pipes that may be leaking.

If you have any questions please call me at 458-6309.

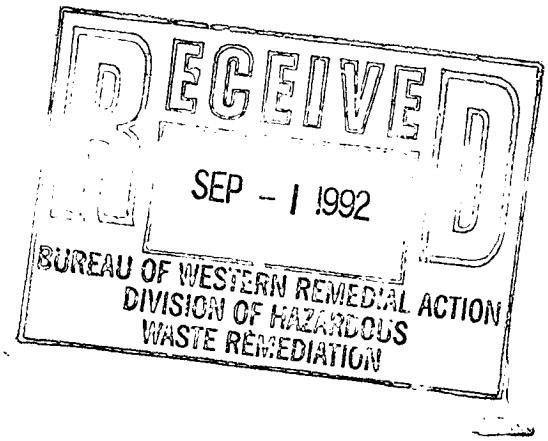
Sincerely,

Lani D. Rafferty

Lani D. Rafferty
Program Research Specialist II
Bureau of Environmental Exposure
Investigation

jlh/92239PRO0075

cc: Dr. Carlson
Mr. Wakeman/Mr. Rivara
Dr. Smith-Blackwell/Mr. O'Connor - Western Region
Mr. Vossler - Allegany County Health Dept.
Mr. Allen - DEC - Central Office
Mr. Doster - DEC - Region 9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SEP - 1 1992
BUREAU OF WESTERN REMEDIAL ACTION
DIVISION OF HAZARDOUS
WASTE REMEDIATION

00-17-1 (4/93)—29a

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

TRANSMITTAL SLIP

TO: Mike Smith, Village of Wellsville, P.O. Box 591 Wellsville, N.Y. 14895	DATE: 10/20/91
FROM: Maria L. Sadiva, DHWR, Reg 9	
RE: Wellsville Andover Landfill Site, Allegany Cnty, 902004: Analytical Results for Leachate	

FOR ACTION AS INDICATED:

- ☐ Please Handle
- ☒ For Your Information
- ☐ Comments
- ☐ Approval/Signature
- ☐ File
- ☐ Return to me by _____
- ☐ Prepare Reply for _____ Signature
- ☐ _____

New York State Department of Environmental Conservation
270 Michigan Avenue, Buffalo, New York, 14203-2999

Thomas C. Jorling
Commissioner

MEMORANDUM

TO: Marcia Ladiana, DHWR - 7010

FROM: E.J. Keron, DHWR - Region 9

SUBJECT: Wellsville Andover - Project Review

DATE: September 30, 1992

Region 9 - DHWR is very much concerned about the recommended alternative remedial action presented by E&E in their Leachate Investigation Report (July 1992) namely - "treat all leachate at the site".

The E&E recommended alternative requires construction of an WWTP with large leachate holding pond adjacent to (or on) the Wellsville-Andover landfill.

Region 9-DHWR prefers Alternative 3 "Haul all Leachate to the Wellsville STP."

This alternative would require storage lagoon(s) at the site capable of holding the highest leachate flow ever plus two feet of freeboard.

At times the leachate would be trucked to the Wellsville STP at a faster rate, than normal pushing the STP flow. This would be only during peak leachate flow. Region 9 DOW is looking into the leachate treating capability of the Wellsville Plant. The increased trucking to the STP would gradually taper off as the landfill cap is properly rebuilt. Post-remediation leachate hauling to the STP should be reduced to 25% of the normal traffic.

The E&E recommended alternative would put a treatment facility at the Wellsville Andover Landfill site. This facility would be discharging to an intermittent stream or need a long discharge pipe downhill to Dykes Creek. Either way the discharge criteria will be strict and treatment of leachate expensive.

The on-site treatment facility would not be needed once the proper capping of the landfill nears completion. Leachate could be treated at that point by the Wellsville STP.

Region HWR recommends -

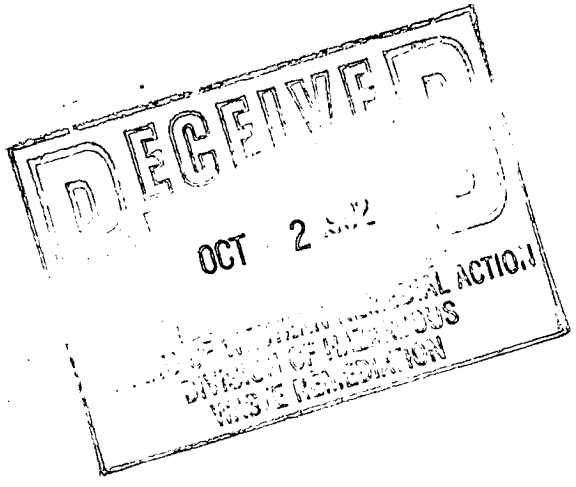
1. Improve the leachate collection system.

2. Provide a proper cap on the landfill.

NOTE: The bridge capacity has been checked constantly by the tank trucks going to the Wellsville STP.

The 12 ton limit is exceeded by every concrete truck, semi or fire truck that needs to use the bridge. The replacement or upgrading of this bridge is not a concern for this leachate study.

ad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OCT 2
DIVISION OF HAZARDOUS
WASTE REMEDIATION

New York State Department of Environmental Conservation
50 Wolf Road, Albany, New York 12233 - 3505

Thomas C. Jorling
Commissioner

MEMORANDUM

TO: Marcia Ladiana, BWRA, DHWR

FROM: Robert Wither, Chemical Systems Section, BWFD, DOW

SUBJECT: Wellsville-Andover Landfill, Allegany County
Site #9-02-004

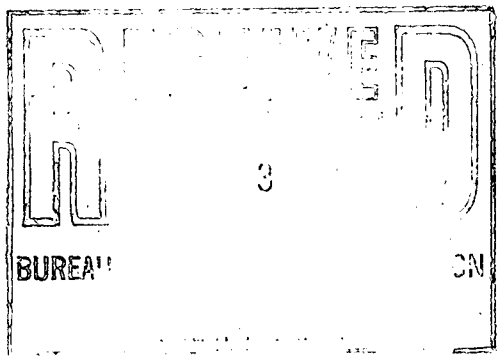
DATE: September 1, 1992

The leachate investigation report for this site has been reviewed. The report should be modified to include the type of treatment system proposed and the time frame to construct the system. Given the highly variable nature of leachate flows, a biological system may not be the most effective type of treatment. Also, increased leachate holding capacity should be installed quickly to minimize the unauthorized discharges to the tributary of Duffy Hollow Creek.

If you have any questions, please call me at 7-6716.

RW/pm

cc: G. Palumbo, Region 9
E. Belmore, DHWR


BUREAU
ON

Jim Feron
STC
EJF

New York State Department of Environmental Conservation

MEMORANDUM

Copy for Marcia Sadiana DHWR - Albany

Thomas C. Jorling
Commissioner

TO: Jim Feron, Gerard Palumbo
FROM: Lawrence Clare
SUBJECT: **Sinclair Refinery**
Wellsville-Andover Landfill
DATE: September 4, 1992

At 10:00 am, September 4, 1992, a meeting was held to discuss the status of these sites. The following summarizes my understanding of our conversation:

Sinclair Refinery Site

The oil separator at this site is proposed to be cleaned and demolished by the EPA Superfund contract. The Village apparently owns the structure and storm sewers. The structural integrity of the 1929 reinforced concrete is questionable. Region 9 DOW would prefer to see the oil separator stay in place after decontamination if the structure is sound. (Oil and spill runoff from the industries in the industrial park would be trapped before entering the Genesee River.

Follow-up

* Jim Feron is to check to see why the proposal includes destruction of the separator.
* Gerard Palumbo will telephone Bob Chaffee to check on:
  A) Ownership of separator and storm sewers
  B) Village's position

Wellsville-Andover Leachate

Ecology and Environment's Leachate investigation report was received on August 31, 1992. The recommendation is to construct a treatment system at the landfill discharging to an intermittent stream adjacent to Snyder Road. The analysis of the treatment plant provided in the report as well as the impact of hauling and an onsite treatment plant wee discussed. Region 9 DOW prefers the selected alternate based on the limited capacity of the existing treatment plant.

Follow-up

* G.A. Palumbo to obtain input from Bob Chaffee.
* James Kersten to review analysis of existing sewage plant capacity as provided in the report. Upgrading requirements?

LGC/dlm

cc: James Kersten

00-17-1 (5/76)
Formerly GA-4

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

TRANSMITTAL SLIP

TO: Judy Ross DFSW,

FROM: Marcia L. Fadiman DHWR, BWRA

DATE: 7/28/92

RE: Wellsville - Andover Landfill Site, Allegany County, No 902004 - Attached for your review please find one copy of the Leachate Investigation Report for the above-referenced site. I would greatly appreciate it if you would forward any comments you may have to this office by August 19, 1992. If you have any questions please contact me at 7-0315

Thanks,
Marcia

FOR ACTION AS INDICATED:

- ☐ Please Handle
- ☐ Prepare Reply
- ☐ Prepare Reply for _____ Signature
- ☐ Information
- ☐ Approval
- ☐ Prepare final/draft in _____ Copies
- ☒ Comments
- ☐ Signature
- ☐ File
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- ☐ _____
- ☐ _____

00-17-1 (5/76)
Formerly GA-4

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

TRANSMITTAL SLIP

TO: Edward J. Fenn, Reg 9, DHWR

FROM: Marcia L. Fadiman, DHWR, BWRA

DATE: 7/28/92

RE: Wellsville - Andover Landfill Site, Allegany County, No. 902004 - Attached for your review please find one copy of the Leachate Investigation Report for the above-referenced site. I would greatly appreciate it if you would forward your comments to this office by August 19, 1992. If you have any questions &/or comments please contact me at (518) 457-0315.

Thanks,
Marcia

FOR ACTION AS INDICATED:

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- ☐ _____

00-17-1 (5/76)
Formerly GA-4

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

TRANSMITTAL SLIP

TO: Robert Wither, DOW

FROM: Marcia Fabiano, DHWR, BWRA

DATE: 7/28/92

RE: Wellsville-Andover Landfill Site, Allegany County, No 902004 - Attached for your review please find one copy of the Leachate Investigation Report for the above-referenced site. I would greatly appreciate it if you would forward any comments you may have to this office by 8/19/92. If you have any questions or comments please contact me at 7-0315.

Thanks,
Marcia

FOR ACTION AS INDICATED:

- ☐ Please Handle
- ☐ Prepare Reply
- ☐ Prepare Reply for _____ Signature
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- ☐ Return to me
- ☐ _____
- ☐ _____

00-17-1 (5/76)
Formerly GA-4

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

TRANSMITTAL SLIP

TO: Betty Seeley

FROM: Marcia Fabiano, DHWR, BWRA

DATE: 7/28/92

RE: Wellsville-Andover Landfill Site, Allegany County, No 902004 - Attached for your review please find one copy of the Leachate Investigation Report for the above-reference site. I would appreciate it if you would forward any comments you may have to this office by 8/19/92. If you have any questions or comments please contact me at 7-0315.

Thanks,
Marcia

FOR ACTION AS INDICATED:

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33-14-13 (2/90) – 28

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
OFFICE OF SERVICES

TELECOPIER MESSAGE INFORMATION

DEGREE OF URGENCY

☐ Immediately ☐ Today ☐ Tommorrow ☐ Other

	NAME	LOCATION	TELEPHONE NUMBER
RECEIVER	[illegible]	Rm. 9	1345
SENDER	[illegible]	[illegible]	[illegible]

SPECIAL INSTRUCTIONS

CONTENTS OF MESSAGE

NOTIFY (Name) _____ at telephone number _____

that a 1 page message has been ☐ sent ☑ received on 9/16 19 92

at 2:32 ☐ AM ☑ PM and that the copy will be picked up ☐ personally ☐ returned by mail

[illegible]
Telecopier Operator

E2-10144
Message Number

THE FOLLOWING PAGES WERE NON-LEGIBLE AT THE TIME OF SCANNING

New York State Department of Environmental Conservation

Thomas C. Jorling
Commissioner

MEMORANDUM

TO: Marcia Ladiana, HWR Albany

FROM: E.J. Feron, Jr., HWR Region 9

SUBJECT: Wellsville Andover [illegible] 902004
Leachate Investigation Report

DATE: September 16, 1992

This memo will confirm [illegible] comments given to you on the telephone on September 15, 1992.

1. Region 9 HWR feels that [illegible] Alternative 3 - hauling all the leachate to the Wellsville STP - is the best remedial action. Region 9, DOW is investigating the present and future capacity of the STP, including upgrading requirements. The increased hauling will be temporary, until the landfill is properly closed, and much less leachate is generated.

2. The recommended Alternative [illegible] construction [illegible] to treat the leachate at the landfill [illegible] be more costly than estimated in the report because of [illegible] which will be part of the required permit [illegible] (SPDES) for discharge to a ditch which is tributary to [illegible]. Once the landfill is properly closed [illegible] of leachate generated is greatly reduced [illegible] will be a bird sanctuary [illegible] of the [illegible] "failing" [illegible] structure" [illegible] bridge [illegible] when more [illegible] will be going across it, is it [illegible] replaced with a stronger bridge or an adequate [illegible] to the site must be provided. Either heavy tanks [illegible] construction supplies, concrete trucks, etc. will have [illegible] get to the site.

Post-it™ Fax Note 7671	Date / # of pages ▸
To Marcia Ladiana	From E.J. Feron
Co. [illegible]	Co.
Dept.	Phone #
Fax #	Fax # 851-7226

printed on recycled paper

END NON-LEGIBLE PAGE(S)

15 (12-75)

New York State Department of Environmental Conservation

MEMORANDUM

TO: Marcia Ladiana, BWRA, DHWR
FROM: Nick Kolak, Research Scientist IV, BTS, DHWR N. Kolak
SUBJECT: Wellsville Andover Landfill Site #9-02-004 - IRM

DATE: AUG 1 3 1992

The July 1992 Leachate Investigation Report (IRM) by Ecology and Environment, Inc. for the referenced site has been reviewed and the following comments are provided.

The Technology Section is in agreement with the need to address the leachate as soon as possible under an IRM. The consulting engineer recommends Remedial Alternative #2, the on-site construction and operation of a 100,000 gpd secondary treatment plant (biological) and a 1,000,000 gallon lagoon. The lagoon would be lined and aerated to provide pretreatment and iron removal. The 5 year cost for construction and operation is estimated to be $949,000.

The Technology Section supports the recommendation to treat the leachate on site and to avoid transportation by tank truck to the POTW that is 5 miles away. However, another perspective is presented here for consideration. It is important to know the estimated emission release of VOCs from the proposed 1,000,000 gallon lagoon. If the VOC emissions do not exceed regulatory concerns, then aeration (air stripping) of the leachate prior to entering the lagoon could serve to remove the VOCs and oxidize the metals. The lagoon would then serve as a large settling basin for the precipitation of the metals.

Although it is possible that active aeration of the lagoon may be required, this approach might obviate the need to construct a treatment plant at considerably more cost. The lagoon may have to be constructed in stages. If the last stage met water quality criteria, the treated water could be discharged to the nearby creek. If the last stage did not meet discharge criteria, the water would be returned to stage 1 of the lagoon for reprocessing. A treatability study should be conducted immediately to generate the appropriate data with which to evaluate this remedial approach.

In any event, a synthetic liner/cap should be installed to minimize the volume of leachate which requires treatment. The design and installation of this cap in probably outside the scope and intent of an IRM.

If you have any questions, please call me at 485-8792.

cc: J. Harrington

M E M O R A N D U M

TO: Marcia Ladiana, Bureau of Western Remediation, DHWR

FROM: Judith Ross, Bureau of Environmental Protection, Division of Fish & Wildlife

SUBJECT: Wellsville - Andover Landfill Site No. 902004 Leachate Investigation Report dated July 1992.

DATE: August 14, 1992

I have reviewed the Leachate Investigation Report for the Wellsville - Andover Landfill prepared by Ecology and Environment, Inc. This report summarizes the current leachate collection and treatment system, evaluates alternatives and chooses a preferred alternative for interim leachate treatment. The report chooses Alternative 2, treatment of leachate and disposal of sludge on-site using a secondary biological treatment plant.

Conceptually, I agree that Alternative 2 provides the best interim solution to the leachate problem at this landfill. But, I have a few concerns regarding this alternative that the report only alluded to or didn't adequately address.

The proposed secondary treatment plant would discharge into a drainage ditch which flows into a class C stream on the west side of Snyder Road. This report states that the discharge may not meet water quality standards for class C streams. I do not find this acceptable. Any effluent discharge from this treatment plant must meet water quality standards for class C streams in order to discharge into the stream as proposed. Without this assurance, I cannot agree to this alternative as presented.

Additionally, this alternative calls for placing the resultant sludge from the treatment plant in the site landfill. But the report does not state clearly, exactly where the on-site sludge will go. Since the sludge will likely contain high levels of contaminants, it should go to a disposal area designed to handle similar-type sludge. It makes no sense to put the resultant sludge back on the landfill waste pile allowing the contaminants to recirculate through the leachate system. An IRM should provide a more permanent solution to the leachate problem. This report should more fully explore hauling the sludge off-site to an appropriate disposal facility rather than simply dismissing it out-of-hand.

15 (12-75)

New York State Department of Environmental Conservation

Betty

MEMORANDUM

TO: Marcia Ladiana, Bureau of Western Remedial Action BJ
FROM: Betty Seeley, Quality Assurance Section
SUBJECT: QA Review of Leachate IR for Wellsville-Andover

DATE: August 3, 1992

I have reviewed the report prepared by E&E for this site and have the following comments:

1. Table 2-4 and 2-5 do not list the dates on which the samples were taken. If the sample labeled MH-4 (RI) was taken during low flow and sample MH-4 (NYSDEC) was taken during high flow the reduced level of inorganics for MH-4 (NYSDEC) can be attributed to dilution. However, the volatile results for MH-4 (NYSDEC) are much higher (i.e., 1,2-Dichloroethene, 240ppb while MH-4 (RI) was 8ppb). It is interesting to note that this higher level of VOAs was found during a period of high flow when reduced concentration would be expected.

2. E&E states that alternative 2 which has an aerated lagoon and a biological treatment plant is the preferred alternative. I see two problems with this alternative that must be addressed prior to selection.

   The first problem is that due to the high levels of VOAs (as shown during period of high flow), the possibility exists for volatiles to be stripped into the atmosphere from the aerator, thereby creating a health risk.

   The second problem is that the type of biological treatment plant is not specified in this report. It is not clear to me that biological treatment is the best method to remove the high level of metals. Why wasn't flocculation or some type of sedimentation treatment considered? Won't the metals be toxic to most bacteria? I feel a more detailed description of the type of biological treatment being considered is needed before a determination can be made that this is really the lowest cost alternative.

cc: M. Serafini

15 (12-75)

New York State Department of Environmental Conservation Betty

MEMORANDUM

TO: Marcia Ladiana, Bureau of Western Remedial Action BS
FROM: Betty Seeley, Quality Assurance Section
SUBJECT: QA Review of Leachate IR for Wellsville-Andover

DATE: August 3, 1992

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1. Table 2-4 and 2-5 do not list the dates on which the samples were taken. If the sample labeled MH-4 (RI) was taken during low flow and sample MH-4 (NYSDEC) was taken during high flow the reduced level of inorganics for MH-4 (NYSDEC) can be attributed to dilution. However, the volatile results for MH-4 (NYSDEC) are much higher (i.e., 1,2-Dichloroethene, 240ppb while MH-4 (RI) was 8ppb). It is interesting to note that this higher level of VOAs was found during a period of high flow when reduced concentration would be expected.

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cc: M. Serafini

ML

New York State Department of Environmental Conservation
50 Wolf Road, Albany, New York 12233 - 3505

Thomas C. Jorling
Commissioner

MEMORANDUM

TO: Marcia Ladiana, BWRA, DHWR

FROM: Robert Wither, Chemical Systems Section, BWFD, DOW

SUBJECT: Wellsville-Andover Landfill, Allegany County
Site #9-02-004

DATE: September 1, 1992

The leachate investigation report for this site has been reviewed. The report should be modified to include the type of treatment system proposed and the time frame to construct the system. Given the highly variable nature of leachate flows, a biological system may not be the most effective type of treatment. Also, increased leachate holding capacity should be installed quickly to minimize the unauthorized discharges to the tributary of Duffy Hollow Creek.

If you have any questions, please call me at 7-6716.

RW/pm

cc: G. Palumbo, Region 9
E. Belmore, DHWR

STATE OF NEW YORK
DEPARTMENT OF HEALTH

Center for Environmental Health 2 University Place Albany, New York 12203-3399

Mark R. Chassin, M.D., M.P.P., M.P.H.
Commissioner
Paula Wilson
Executive Deputy Commissioner

OFFICE OF PUBLIC HEALTH
Sue Kelly
Executive Deputy Director
William N. Stasiuk, P.E., Ph. D.
Center Director

August 28, 1992

Ms. Marcia Ladiana
Environmental Engineer
Bureau of Hazardous Waste Remediation
NYS Dept. of Environmental Conservation
50 Wolf Rd., Room 222
Albany, NY 12233

RE: Wellsville Andover Landfill
Wellsville and Andover
Allegany County
ID #902004

Dear Ms. Ladiana:

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1. Section 3.2, Effluent Quality. This section discusses the treatment of the effluent for the purpose of meeting the SPDES permit requirements, and that the Waste Water Treatment Plant (WWTP) has difficulty "treating other constituents". Please provide more detail regarding what the constitutents are and the difficulty in treating these constituents.

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3. Long term advantages/disadvantages should be evaluated for each Interim Remedial Alternative for leachate treatment. My concern with alternative number 2 is that once the landfill is remediated, on-site leachate treatment may not be necessary. Consideration should be given to upgrading the current WWTP so that additional leachate could be accepted in lieu of building a treatment facility onsite. I concur with the proposal to construct an additional leachate collection pond, and to repair any leachate collection pipes that may be leaking.

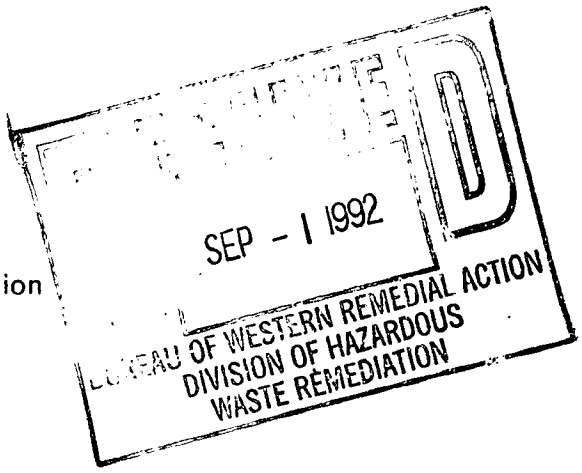
If you have any questions please call me at 458-6309.

Sincerely,

Lani D. Rafferty
Program Research Specialist II
Bureau of Environmental Exposure
Investigation

jlh/92239PRO0075

cc: Dr. Carlson
Mr. Wakeman/Mr. Rivara
Dr. Smith-Blackwell/Mr. O'Connor - Western Region
Mr. Vossler - Allegany County Health Dept.
Mr. Allen - DEC - Central Office
Mr. Doster - DEC - Region 9



M E M O R A N D U M

TO: Marcia Ladiana, Bureau of Western Remediation, DHWR

FROM: Judith Ross, Bureau of Environmental Protection, Division of Fish & Wildlife

SUBJECT: Wellsville - Andover Landfill Site No. 902004 Leachate Investigation Report dated July 1992.

DATE: August 14, 1992

I have reviewed the Leachate Investigation Report for the Wellsville - Andover Landfill prepared by Ecology and Environment, Inc. This report summarizes the current leachate collection and treatment system, evaluates alternatives and chooses a preferred alternative for interim leachate treatment. The report chooses Alternative 2, treatment of leachate and disposal of sludge on-site using a secondary biological treatment plant.

Conceptually, I agree that Alternative 2 provides the best interim solution to the leachate problem at this landfill. But, I have a few concerns regarding this alternative that the report only alluded to or didn't adequately address.

The proposed secondary treatment plant would discharge into a drainage ditch which flows into a class C stream on the west side of Snyder Road. This report states that the discharge may not meet water quality standards for class C streams. I do not find this acceptable. Any effluent discharge from this treatment plant must meet water quality standards for class C streams in order to discharge into the stream as proposed. Without this assurance, I cannot agree to this alternative as presented.

Additionally, this alternative calls for placing the resultant sludge from the treatment plant in the site landfill. But the report does not state clearly, exactly where the on-site sludge will go. Since the sludge will likely contain high levels of contaminants, it should go to a disposal area designed to handle similar-type sludge. It makes no sense to put the resultant sludge back on the landfill waste pile allowing the contaminants to recirculate through the leachate system. An IRM should provide a more permanent solution to the leachate problem. This report should more fully explore hauling the sludge off-site to an appropriate disposal facility rather than simply dismissing it out-of-hand.

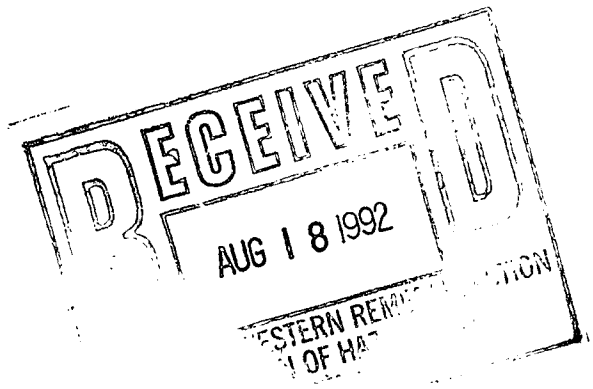
If you have any questions about these comments, please call me at 457-1769.

Conservation Biologist II (Ecology)

JR/lfc

cc: R. Koeppicus
L. Nelson, Region 9
J. Galati, Region 9

JR2.MEM/LC0083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New York State Department of Environmental Conservation

MEMORANDUM

TO: Marcia Ladiana, BWRA, DHWR
FROM: Nick Kolak, Research Scientist IV, BTS, DHWR N. Kolak
SUBJECT: Wellsville Andover Landfill Site #9-02-004 - IRM

DATE: AUG 1 3 1992

The July 1992 Leachate Investigation Report (IRM) by Ecology and Environment, Inc. for the referenced site has been reviewed and the following comments are provided.

The Technology Section is in agreement with the need to address the leachate as soon as possible under an IRM. The consulting engineer recommends Remedial Alternative #2, the on-site construction and operation of a 100,000 gpd secondary treatment plant (biological) and a 1,000,000 gallon lagoon. The lagoon would be lined and aerated to provide pretreatment and iron removal. The 5 year cost for construction and operation is estimated to be $949,000.

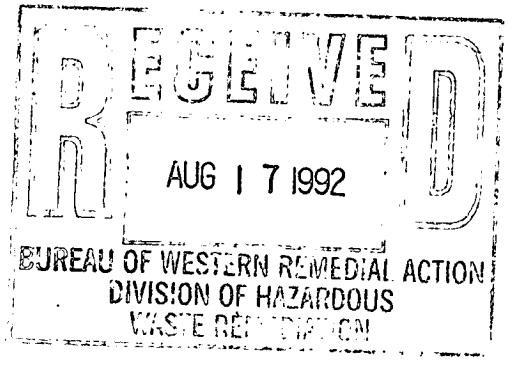
The Technology Section supports the recommendation to treat the leachate on site and to avoid transportation by tank truck to the POTW that is 5 miles away. However, another perspective is presented here for consideration. It is important to know the estimated emission release of VOCs from the proposed 1,000,000 gallon lagoon. If the VOC emissions do not exceed regulatory concerns, then aeration (air stripping) of the leachate prior to entering the lagoon could serve to remove the VOCs and oxidize the metals. The lagoon would then serve as a large settling basin for the precipitation of the metals.

Although it is possible that active aeration of the lagoon may be required, this approach might obviate the need to construct a treatment plant at considerably more cost. The lagoon may have to be constructed in stages. If the last stage met water quality criteria, the treated water could be discharged to the nearby creek. If the last stage did not meet discharge criteria, the water would be returned to stage 1 of the lagoon for reprocessing. A treatability study should be conducted immediately to generate the appropriate data with which to evaluate this remedial approach.

In any event, a synthetic liner/cap should be installed to minimize the volume of leachate which requires treatment. The design and installation of this cap in probably outside the scope and intent of an IRM.

If you have any questions, please call me at 485-8792.

cc: J. Harrington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