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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 Allied Corporation - EPA ID No. NYD051816262.

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)
Frank Shattuck/NYSDEC-Region 9-Hazardous Substance Engineer (w)
TES ZPMO

PRELIMINARY
RCRA FACILITY ASSESSMENT
ALLIED FIBERS AND PLASTICS
ALLIED CHEMICAL CORPORATION
TONAWANDA, 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

PRELIMINARY
RCRA FACILITY ASSESSMENT
ALLIED FIBERS AND PLASTICS
ALLIED CHEMICAL CORPORATION
TONAWANDA, 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.:	NYD051816262
Contract No.:	68-W9-0003 (TES-6)
TRC Document No.:	NY-R40.R11
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 18, 1993

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1.0 INTRODUCTION

TRC Environmental Corporation (TRC - formerly Alliance Technologies Corporation) was requested by the U.S. Environmental Protection 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 Allied Fibers and Plastics, Allied Chemical Corporation (Allied), facility in Tonawanda, New York (EPA I.D. No. NYD051816262). 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 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 Waste 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 cursory drive-by site visit was conducted by TRC on September 9, 1993, because the current owner of the site was not identified at the time of the visit.

2.0 FACILITY DESCRIPTION

Allied is located on River Road in the Town of Tonawanda, New York. The property has been abandoned since 1984. The property is completely surrounded by a fence and is overgrown with vegetation. There are several buildings on the property; the structural integrity of the buildings is unknown. Allied property is surrounded by the Tonawanda Coke Processing Facility. The surrounding area is highly industrialized (TRC, 1993). The Site Location Map is provided as Figure 1.

Three AOCs were identified in the Part A application; AOC #1 - Hazardous Waste Drum Storage Area, and AOCs #2 and #3 - Blow Down Pits. The locations of these AOCs are shown on Figure 2 (Allied Chemicals, 1984).

AOC #1 - Hazardous Waste Drum Storage Area

The information pertaining to this AOC is limited. No documented releases have occurred from this AOC. The drum storage pad was concrete. Closure activities included disposing of all drums and steam cleaning the concrete pad. Sampling was not performed at this AOC (Allied Chemicals, 1984).

AOCs #2 and #3 - Blow Down Pits

Available files contained no information regarding these two blow down pit areas. No information was found to identify what was disposed of in these pits. Their locations were identified on the site map included as part of the RCRA Part A application (Allied Chemicals, 1984).

3.0 FACILITY ACTIVITY/HISTORY

Allied is located at 3861 River Road in the Town of Tonawanda, New York. The site is currently owned by Tonawanda Coke; although it is not known when this transaction occurred. Information regarding Tonawanda Coke was not available.

Allied polymerized ethylene into low molecular weight polyethylene which was finished into powder, pellet, and solid form and then sold. Operations ceased in 1980.

Wastes generated were collected in 55-gallon drums and stored in the Hazardous Waste Drum Storage Area (AOC #1) prior to shipment off-site.

Some liquid from process streams which was mainly water with a small amount of isopropyl alcohol (generally 1 to 3 percent), trace polyethylene and lube oils were collected in storage tanks which were situated within a paved concrete enclosure. These diluted solutions do not meet any criteria that would make them hazardous and were discharged to a POTW at a controlled rate after analysis. The location and additional information regarding these tanks was not provided in the files (Allied Chemicals, 1984).

Allied initiated closure procedures for the Hazardous Waste Drum Storage Area in 1982. The Closure Plan, which the facility submitted to NYSDEC on November 27, 1984, was approved in May 1985. The State notified the facility that they needed to submit a formal request in writing to withdraw the Part A Application (Allied Chemicals, 1985).

Remediation activities began on April 30, 1991 and were completed on May 6, 1991. Activities included excavating the blow down pits to a depth of approximately 12 feet over an area of about 3/4 of an acre, and excavation of the catchbasin area. The files did not contain any additional information regarding this catchbasin. It was estimated by the consultants, ERM, that 860 cubic yards (1,000 tons) of soil were removed from

the blow down pits. The pits were backfilled, regraded and seeded. A final inspection was conducted by NYSDEC on May 17, 1991 and the remedial work was found to be satisfactorily completed (NYSDEC, 1991).

The excavated soil was disposed of in a nonhazardous waste landfill owned by BFI in Niagara Falls, New York. The soil was contaminated with mostly chromium. Organic solvents were detected in the ground water monitoring wells located immediately outside the perimeter chain link fence. No relationship has been established in identifying the source of the organic solvents. An EPA Inspection Report dated June 6, 1991, recommended that the site maintain the EPA ID number in the event that future excavation activities and/or ground water sampling indicate the presence of on-site RCRA-hazardous wastes, for either metals or organic solvents (EPA, 1991).

4.0 ENVIRONMENTAL SETTING

No information was found in available files regarding the environmental setting.

The Erie County Board of Health indicated that the area is zoned industrial, and the properties are most likely serviced by the public water supply. There are no sole source aquifers in the area (TRC, 1993b).

The surrounding area is highly industrialized. Limits of pavement, condition of buildings, wet areas etc. could not be determined from the drive-by site visit due to the overgrown vegetation on site.

5.0 PRELIMINARY EVALUATION

TRC performed a drive by site visit but was unable to adequately walk the site to determine the condition of the former Hazardous Waste Storage Area or Blow Down Pits. The files were limited and information regarding historical use dates, operational use of these areas, past disposal practices and waste management were not found.

Ground water wells sampled in the area are contaminated with organic solvents, but the source is unknown. Recent ground water monitoring results were not available.

Additional information pertaining to the history of the site, confirmational sampling, and past waste management practices should be collected for further evaluation.

6.0 SUMMARY

Allied operated a specialty chemical manufacturing plant until 1980. The Hazardous Waste Drum Storage Area closure activities were initiated in 1982. The closure plan was approved by NYSDEC in 1985.

Remedial activities were conducted on site in 1991. These activities included excavating the blow down pits and steam cleaning the Hazardous Waste Storage Area pad. The inspection conducted following remedial activities reported the effort was performed satisfactorily. The excavated soil was found to be contaminated with chromium and was disposed of in an approved landfill.

The site has been closed since 1980 and remediation activities commenced in 1991. A final inspection of the property was conducted in 1991, by the NYSDEC and the remediation activities were found to be satisfactorily completed.

REFERENCES

Allied Chemicals, 1984. Letter to Mr. John L. Middlekoop, P.E., NYSDEC. March 6. RE: RCRA Part A Application.

Allied Chemicals, 1985. Letter to Mr. Richard A. Baker, U.S. EPA. June 3. RE: Part A Application withdrawal request.

Allied Chemicals, 1985. Letter to NYSDEC. March 4. RE: Report Submittal.

Allied Corporation, 1982. Letter to Dr. Ernest A. Regna (NYSDEC). July 30. RE: Decontamination procedures.

Allied Fibers & Plastics, 1984. Letter to Dr. Ernest A. Regna (NYSDEC). July 27. RE: Plant closure notification.

Allied Fibers & Plastics, 1984. Letter to Mr. John L. Middlekoop, NYSDEC. November 27. RE: Submittal of Closure Plan.

EPA, 1991. Part III Inspection Report dated June 6, 1991. Author unknown.

NYSDEC, 1982. Letter to Mr. J.L. Harris. July 14. RE: Closure plan approval.

NYSDEC, 1984. Letter to Mr. J.L. Harris. RE: Public Notice requirements.

NYSDEC, 1984. Letter to Mr. J.L. Harris. August 10. RE: Acknowledgement of receiving July 27, 1984 letter.

NYSDEC, 1985. Letter to Mr. Leon A. Mattiola. May 13. RE: Approval of Closure Plan.

NYSDEC, 1985. Letter to Mr. Leon A. Mattiola, from Randy S. McDermott. February 13, 1985. RE: Public notice.

NYSDEC, 1991. Memorandum to Ed Belmore, Bureau of Western Remedial Action, from Al Rockmore, Bureau of Construction Services, June 4, 1991. RE: Remedial Activities.

RECRA Research, Inc., 1984. Letter to Mr. Harris, Allied Fibers & Plastics. October 2, 1984.

TRC, 1993. Drive by Site Visit conducted by David Brouillet, September 9, 1993.

TRC, 1993a. Site drive by, conducted by D. Brouillet (TRC) September 9, 1993.

TRC, 1993b. Telecon between S. Zarlengo (TRC) and John (Erie County Board of Health). September 28, 1993.

APPENDIX A

RCRA FACILITY ASSESSMENT (RFA) REVIEW CHECKLIST

RCRA FACILITY ASSESSMENT (RFA) REVIEW CHECKLIST

United States Environmental Protection Agency
Region II
Air and Waste Management Division
Hazardous Waste Facilities Branch

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

This RFA checklist has adequate space for facilities with 12 SWMUs / AOCs. If the facility you are reviewing has more than 12 SWMUs / AOCs, simply add more pages marked the by the ® (which is found in the first set of each checklist section for individual SWMUs / AOCs).

Note: This copy for review does not contain space for 12 SWMUs/AOCs — please comment on how much space you think it should provide or if each reviewer should just make up the space she/he needs.

RFA COMPONENT 1: PRELIMINARY REVIEW (PR)

A. General manufacturing process description: X P __NP __A X NA

Comments: The RCRA closure plan briefly describes a facility description and operations.

B. General facility waste generation description: X P __NP X A __NA

Comments: Located in RCRA Closure Plan

C. Environmental/hydrogeologic setting description: __P X NP __A __NA

Comments:

D. SWMU identification list: __P X NP __A __NA

Comments:

E. Was the SWMU subset of RCRA regulated units denoted? __Y X N __A __NA

Comments:

F. Were other AOCs (e.g. spills, leaks) listed? __Y X N __A __NA

Comments: Although not listed as AOCs, 2 previous disposal sites were mentioned.

G. Were potential off-site exposure pathways identified? (e.g. drinking water wells, irrigated farm land, swamps) __Y X N __A X NA

Comments:

H. Detailed SWMU and AOC information:

SWMU # 5 or AOC Hazardous Waste Storage Area

1. Is unit located on a facility map? X Y __ N __ A __ NA

Comments: _____

2. Unit characteristics (e.g. design, liners, age, construction):
X P __ NP __ A __ NA

Comments: Minimal information provided

3. Waste characteristics (e.g. types, volumes, classification):
X P __ NP __ A X NA

Comments: Minimal information provided

4. Waste Migration pathways:

a. Air: __ OR __ SR X PoR __ NR

i. Is documentation provided? __ Y X N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? __ Y X N

Comments: The area is no longer there so air is not a problem

b. Soil: __ OR __ SR X PoR __ NR

i. Is documentation provided? __ Y X N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? __ Y X N

Comments: It is possible that the soil was contaminated.

c. Ground Water: __ OR __ SR X PoR __ NR

i. Is documentation provided? __ Y X N

ii. Does the documentation provide acceptable support for the determination (OR, SR, PoR, NR)? __ Y X N

Comments: No sampling was provided.

d. Surface Water: __CR __SR X PoR __NR

i. Is documentation provided? __Y X N

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

Comments: No surface water in the area

e. Subsurface gas: __CR __SR X PoR __NR

i. Is documentation provided? __Y X N

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

Comments: NO sampling results available

5. Conclusions/ Recommendations:

a. X 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: _____

b. Is the recommendation acceptable? __Y __N

Comments: _____

I. Did the PR identify any data gaps? __Y X N __A __NA

a. If "Y", list the data gaps: _____

Comments: _____

J. Other comments on the PR: AOC's were derived from a site plan only. Limited information available.

RFA Component 2: Visual Site Inspection (VSI)

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

Comments: The VSI consisted of a Perimeter survey only

B. Site safety plan including the monioring of vapor emissions (respirators, chemically resistant clothing, etc.): __P X NP __A __NA

Comments: A site safety plan was not required because the VSI was a perimeter survey only.

C. Facility inspection:

1. Was each SWMU noted in the PR examined? __Y X N

Comments: _____

2. Was each AOC noted in the PR examined? __Y X N

Comments: _____

3. Was the entire facility traversed in order to identify additional AOCs identify additinal SWMUs, complete data gaps from the PR, etc.? __Y X N __A __NA

Comments: _____

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

Comments: _____

4. Did the VSI include an inspection beyond the facility boundary? __Y X N

Comments: The VSI was a perimeter survey only

5. SWMU # ___ or AOC All AOC's

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 individual AOCs could not be seen due to the distance and overgrown vegetation

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: ___

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: The property was photographed from the road.

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: The VSI was very limited and therefore a recommendation can not be made.

D. Other comments on the VSI: The VSI consisted of a perimeter survey only. The site has not been in use for many years + is overgrown with vegetation.

RFA REVIEW SUMMARY

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

# 1	Hazardous Waste Storage Area	#	
# 2	Disposal Area	#	
# 3	Disposal Area	#	
#		#	
#		#	
#		#	
#		#	
#		#	
#		#	
#		#	
#		#	
#		#	
#		#	
#		#	
#		#	
#		#	
#		#	
#		#	
#		#	

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

#		#	
#		#	
#		#	
#		#	
#		#	

C. List AOCs identified in the RFA:

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

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

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

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

# 2	Disposal area	# ___	_____
# 3	Disposal area	# ___	_____
# ___	_____	# ___	_____
# ___	_____	# ___	_____
# ___	_____	# ___	_____
# ___	_____	# ___	_____
# ___	_____	# ___	_____
# ___	_____	# ___	_____
# ___	_____	# ___	_____
# ___	_____	# ___	_____

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

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

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:

Information received after the PR and VSI indicate the soil was excavated + disposed of (AOC # 2 + 3)

No confirmational sampling results were available.

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

Comments: _____

K. Any additional / miscellaneous comments on the RFA: _____

TRC

TRC Environmental Corporation

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