



May 1, 2001

Mr. Timothy DiGiulio, P.E.  
NYSDEC  
Division of Solid and Hazardous Waste  
Bureau of Radiation and Hazardous Waste  
50 Wolf Road  
Albany, NY 12233-7010

RECEIVED  
NYSDEC  
MAY - 8 2001  
BUREAU OF RADIATION &  
HAZARDOUS SITE MANAGEMENT  
DIVISION OF SOLID &  
HAZARDOUS MATERIALS

Re: Former Allied Specialty Chemical Site  
Tonawanda, NY

File: 1163/26080 #2

Dear Mr. DiGiulio:

The purpose of this letter is to transmit the analytical results of sediment sampling conducted at the Former Allied Specialty Chemicals Site in Tonawanda, New York as part of Task 1 of the Interim Remedial Measures (IRM) Work Plan.

In accordance with Task 1 – Storm Sewer Evaluation of the IRM Work Plan and the New York State Department of Environmental Conservation (NYSDEC) correspondence dated June 12, 2000 providing conditional approval of the IRM Work Plan, removal of sediments in the immediate vicinity of the inlet and outfall areas of the 36-inch and 48-inch diameter sewers was conducted. The excavations were conducted to remove potentially contaminated sediments from the inlet and outfall areas, as well as to provide a basin to allow sediment generated during the sewer cleaning to settle at the outfall area.

Pursuant to the NYSDEC correspondence dated June 12, 2000, samples were collected from the inlet and outfall area of the 36-inch diameter sewer (Inlet A and Outfall #1) and 48-inch diameter sewer (Inlet B and Outfall #2) subsequent to the excavations. The samples were analyzed in accordance with NYSDEC ASP procedures for volatile organic compounds (VOCs) using USEPA Method 8260B, semivolatile organic compounds (SVOCs) using USEPA Method 8270C, metals using USEPA Method 6010B, mercury using USEPA Method 7471, and cyanide using USEPA Method 9010B/9014. The samples from Inlets A and B were collected approximately 0.5 ft below the bottom of each sewer pipe. The samples from Outfalls #1 and #2 were collected approximately 1-ft below the bottom of each sewer pipe.

The VOC, SVOC, and metals (including cyanide) analytical data are provided on Tables 1, 2, and 3, respectively. As shown on Table 1, VOCs were detected at both inlet areas (Inlets A and B), and both outfall areas (Outfalls #1 and #2). Regarding the 36-inch sewer, the data indicate that total VOC concentrations were higher at Inlet A (170 µg/Kg) than Outfall #1 (146 µg/Kg). Conversely, the data associated with the 48-inch diameter sewer indicate that the total VOC concentrations at Inlet B (estimated at 2 µg/Kg) were less than at Outfall #2 (1,116.7 µg/Kg). The elevated VOCs detected in



the sample from Outfall #2 are likely associated with an observed tar-like material in the vicinity of the outfall.

As shown on Table 2, SVOCs were detected in both the inlet and outfall samples. The majority of the SVOCs detected are polynuclear aromatic hydrocarbons (PAHs) typically derived from incomplete combustion and tar-like substances. The PAHs detected in the samples include the following compounds: acenaphthene, acenaphthylene, anthracene, benzo(a)anthracene, benzo(b)fluoranthene, benzo(ghi)perylene, benzo(k)fluoranthene, benzo(a)pyrene, chrysene, dibenzo(a,h)anthracene, fluoranthene, fluorene, indeno(1,2,3-cd)pyrene, naphthalene, phenanthrene, and pyrene. Total PAH concentrations were higher at the outfalls than at the inlets.

As shown on Table 3, metals were detected in both inlet and outfall samples. In evaluating the metals analytical data, those metals that were greater than one half an order of magnitude higher in the outfall samples, as compared to the inlet samples, were considered site-related. Based on this evaluation, calcium was the only metal constituent that was detected at a concentration greater than one half an order of magnitude in the outfall sample (Outfall #2) compared to the inlet sample (Inlet B). In general, the metals concentrations are higher at the inlets than the outfalls, suggesting an off-site origin. Cyanide was not detected in the inlet or outfall samples.

A comparison between VOC, SVOC, and metals analytical results for sediment samples collected during May 1999 as part of a voluntary site investigation (O'Brien & Gere Engineers, Inc., letter report dated November 9, 1999), and the recent sediment sampling (November 2000), is provided on Table 4. The data shown on Table 4 is summarized as follows:

- Total VOC concentrations were lower during November 2000 compared to May 1999.
- Total PAH concentrations were lower during November 2000 compared to May 1999 at Inlet A and Outfall #2, and higher at Inlet B and Outfall #1.
- The total concentration of other SVOCs was generally higher during November 2000 compared to May 1999, with the exception of Outfall #2.
- Metals concentrations that were greater than one half an order of magnitude in the outfall samples compared to the inlet samples were considered to be site-related. During the May 1999 sampling, concentrations of calcium at Outfall #2, mercury at Outfalls #1 and #2, and cyanide at Outfalls #1 and #2 were considered to be site-related. During the November 2000 sampling, the concentrations of mercury was lower at Inlet A, Outfalls #1 and #2, and higher at Inlet B compared to the May 1999 data, and cyanide was not detected.

While the recently collected data provides additional indications of sediment impacts in the vicinity of the inlets and outfalls of the sewers, surface water results from the May 1999 investigation indicated that contaminants in the sediments are not having a significant impact on the quality of storm water discharge. The results showed that water quality data for surface water at the inlets and outfalls contained very low concentrations of VOCs, SVOCs, and metals that are orders of magnitude less than the sediment concentrations.

Mr. Timothy DiGiulio, P.E.  
May 1, 2001  
Page 3

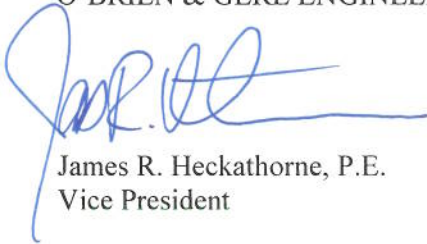
We will proceed with the following actions in accordance with the approved IRM Work Plan:

- Characterization and disposal of sediments generated during the sewer cleaning
- Backfill areas around inlets and outfalls with crushed stone
- Install ground water monitoring wells
- Complete site survey of newly installed wells
- Collect surface water samples

If you have any questions regarding this letter or the project in general, please do not hesitate to contact me at (315) 437-6100.

Very truly yours,

O'BRIEN & GERE ENGINEERS, INC.

A handwritten signature in blue ink, appearing to read 'J. Heckathorne', with a long horizontal flourish extending to the right.

James R. Heckathorne, P.E.  
Vice President

\\GEMINI\ALT\SYRACUSE\DIV71\Projects\1163\26080\2\_corres\task1-sedltr.doc

cc: David A. Paley, P.E. – Honeywell  
Glenn May – NYSDEC  
David J. Carnevale – O'Brien & Gere  
Donald Canestrari – O'Brien & Gere





**Table 1**  
**Honeywell**  
**Tonawanda, NY**  
**Volatile Organic Compound Data**  
**Storm Sediment Samples**

Compound	Sample ID	Outfall #1	Outfall #1 DUP	Outfall #2	Storm Inlet A	Storm Inlet B
	Sample Date	11/15/00	11/15/00	11/15/00	11/15/00	11/15/00
	Units	ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg
1,1,1-Trichloroethane	5 U	5 U	5 U	3 U	6 U	7 U
1,1,2,2-Tetrachloroethane	5 U	5 U	5 U	3 U	6 U	7 U
1,1,2-Trichloroethane	5 U	5 U	5 U	3 U	6 U	7 U
1,1-Dichloroethane	5 U	5 U	5 U	3 U	6 U	7 U
1,1-Dichloroethene	5 U	5 U	5 U	3 U	6 U	7 U
1,2-Dichloroethane	5 U	5 U	5 U	3 U	6 U	7 U
1,2-Dichloropropane	5 U	5 U	5 U	3 U	6 U	7 U
1,2-Dichloroethene (MEK)	22	2 J	2 J	13 U	31	28 U
2-Butanone	9 U	10 U	10 U	6 U	11 U	14 U
4-Methyl-2-pentanone (MIBK)	9 U	10 U	10 U	6 U	11 U	14 U
Acetone	55	51	28	28	120	28 U
Benzene	27	22	170	170	6 U	7 U
Bromodichloromethane	5 U	5 U	5 U	3 U	6 U	7 U
Bromoform	5 U	5 U	5 U	3 U	6 U	7 U
Bromomethane	9 U	10 U	10 U	6 U	11 U	14 U
Carbon disulfide	2 J	2 J	0.7 J	8	7 U	7 U
Carbon tetrachloride	5 U	5 U	3 U	3 U	6 U	7 U
Chlorobenzene	5 U	5 U	3 U	3 U	6 U	7 U
Chloroethane	9 U	10 U	10 U	6 U	11 U	14 U
Chloroform	5 U	5 U	5 U	3 U	6 U	7 U
Chloromethane	9 U	10 U	10 U	6 U	11 U	14 U
Dibromochloromethane	5 U	5 U	5 U	3 U	6 U	7 U
Ethene, 1,2-dichloro-, (E)-	2 J	2 J	5	5	6 U	7 U
Ethylbenzene	5	5 J	300	300	6 U	7 U
Methylene chloride	2 J	2 J	1 J	1 J	7 J	2 J
Styrene	5 U	5 U	6	6	6 U	7 U
Tetrachloroethene	5 U	5 U	1 J	1 J	6 U	7 U
Toluene	4 J	3 J	100	100	6 U	7 U
Trichloroethane	6	5 J	14	14	4 J	7 U
Vinyl chloride	1 J	1 J	2 J	2 J	11 U	14 U
Xylene (total)	11	9	480	480	6 U	7 U
cis-1,2-Dichloroethene	9	8	10	10	6 U	7 U
cis-1,3-Dichloropropylene	5 U	5 U	3 U	3 U	6 U	7 U
trans-1,3-Dichloropropene	5 U	5 U	3 U	3 U	6 U	7 U

NOTES: U - Not detected, J - Estimated value --- - Not analyzed.





**Table 2**  
**Honeywell**  
**Tonawanda, NY**  
**Semivolatile Organic Compound Data**  
**Storm Sediment Samples**

Compound	Sample ID	Outfall #1	Outfall #1 DUP	Outfall #2	Storm Inlet A	Storm Inlet B
	Sample Date	11/15/00	11/15/00	11/15/00	11/15/00	11/15/00
	Units	ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg
1,2,4-Trichlorobenzene		31000 U	35000 U	42000 U	15000 U	920 U
1,2-Dichlorobenzene		31000 U	35000 U	42000 U	15000 U	920 U
1,3-Dichlorobenzene		31000 U	35000 U	42000 U	15000 U	920 U
1,4-Dichlorobenzene		31000 U	35000 U	42000 U	15000 U	920 U
2,4,5-Trichlorophenol		160000 U	170000 U	210000 U	74000 U	4600 U
2,4,6-Trichlorophenol		31000 U	35000 U	42000 U	15000 U	920 U
2,4-Dichlorophenol		31000 U	35000 U	42000 U	15000 U	920 U
2,4-Dimethylphenol		31000 U	35000 U	42000 U	15000 U	920 U
2,4-Dinitrophenol		160000 U	170000 U	210000 U	74000 U	4600 U
2,4-Dinitrotoluene		31000 U	35000 U	42000 U	15000 U	920 U
2,6-Dinitrotoluene		31000 U	35000 U	42000 U	15000 U	920 U
2-Chloronaphthalene		31000 U	35000 U	42000 U	15000 U	920 U
2-Chlorophenol		31000 U	35000 U	42000 U	15000 U	920 U
2-Methylnaphthalene		340 J	35000 U	790 J	15000 U	52 J
2-Methylphenol		31000 U	35000 U	42000 U	15000 U	920 U
2-Nitroaniline		160000 U	170000 U	210000 U	74000 U	4600 U
2-Nitrophenol		31000 U	35000 U	42000 U	15000 U	920 U
3,3-Dichlorobenzidine		63000 U	69000 U	84000 U	30000 U	1900 U
3-Nitroaniline		160000 U	170000 U	210000 U	74000 U	4600 U
4,6-Dinitro-2-methylphenol		160000 U	170000 U	210000 U	74000 U	4600 U
4-Bromophenyl phenyl ether		31000 U	35000 U	42000 U	15000 U	920 U
4-Chloro-3-methylphenol		31000 U	35000 U	42000 U	15000 U	920 U
4-Chloroaniline		31000 U	35000 U	42000 U	15000 U	920 U
4-Chlorophenyl phenyl ether		31000 U	35000 U	42000 U	15000 U	920 U
4-Methylphenol		31000 U	35000 U	42000 U	15000 U	920 U
4-Nitroaniline		160000 U	170000 U	210000 U	74000 U	4600 U
4-Nitrophenol		160000 U	170000 U	210000 U	74000 U	4600 U
Acenaphthene		870 J	780 J	3200 J	15000 U	47 J
Acenaphthylene		2300 J	1700 J	3800 J	15000 U	1300
Anthracene		43000	3400 J	110000	15000 U	3500
Benzo(a)anthracene		130000	93000	210000	260 J	9200
Benzo(b)fluoranthene		170000	120000	250000	580 J	8900
Benzo(ghi)perylene		53000	40000	87000	160 J	10 J
Benzo(k)fluoranthene		52000	37000	110000	270 J	3700
Benzo(a)pyrene		120000	91000	200000	300 J	1300

NOTES: U - Not detected. J - Estimated value. --- - Not analyzed. D - Result reported from diluted analysis





**O'BRIEN & GERE**  
ENGINEERS, INC.

**Table 2**  
**Honeywell**  
**Tonawanda, NY**  
**Semivolatile Organic Compound Data**  
**Storm Sediment Samples**

Compound	Sample ID	Outfall #1	Outfall #1 DUP	Outfall #2	Storm Inlet A	Storm Inlet B
	Sample Date	ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg
Bis(2-chloroethoxy)methane	31000 U	35000 U	42000 U	15000 U	920 U	
Bis(2-chloroethyl)ether	31000 U	35000 U	42000 U	15000 U	920 U	
Bis(2-chloroisopropyl) ether	31000 U	35000 U	42000 U	15000 U	920 U	
Bis(2-ethylhexyl)phthalate (BEHP)	31000 U	35000 U	740 J	23000	69 J	
Butyl benzyl phthalate	31000 U	35000 U	42000 U	15000 U	920 U	
Carbazole	880 J	430 J	1800 J	15000 U	29 J	
Chrysene	110000	79000	210000	530 J	7700	
Di-n-butyl phthalate	31000 U	35000 U	42000 U	260 J	11 J	
Di-n-octyl phthalate	31000 U	35000 U	42000 U	15000 U	920 U	
Dibenz(o,h)anthracene	1400 J	1000 J	2400 J	15000 U	80 J	
Dibenzofuran	870 J	580 J	2700 J	15000 U	29 J	
Diethyl phthalate	31000 U	35000 U	42000 U	15000 U	55 J	
Dimethyl phthalate	31000 U	35000 U	42000 U	15000 U	920 U	
Fluoranthene	290000	230000	480000	470 J	19000 D	
Fluorene	2400 J	2000 J	60000	15000 U	1300	
Hexachlorobenzene	31000 U	35000 U	42000 U	15000 U	24 J	
Hexachlorobutadiene	31000 U	35000 U	42000 U	15000 U	920 U	
Hexachlorocyclopentadiene	31000 U	35000 U	42000 U	15000 U	920 U	
Hexachloroethane	31000 U	35000 U	42000 U	15000 U	22 J	
Indeno(1,2,3-cd)pyrene	53000	39000	87000	160 J	1000	
Isophorone	31000 U	35000 U	42000 U	15000 U	920 U	
N-Nitrosodiphenylamine	31000 U	35000 U	42000 U	15000 U	920 U	
N-Nitrosodipropylamine	31000 U	35000 U	42000 U	15000 U	920 U	
Naphthalene	1700 J	1400 J	64000	15000 U	68 J	
Nitrobenzene	31000 U	35000 U	42000 U	15000 U	920 U	
Pentachlorophenol	160000 U	170000 U	210000 U	74000 U	4600 U	
Phenanthrene	190000	170000	340000	270 J	9000	
Phenol	31000 U	35000 U	42000 U	15000 U	920 U	
Pyrene	300000	230000	500000	1100 J	6600	

NOTES: U - Not detected. J - Estimated value. --- - Not analyzed. D - Result reported from diluted analysis





**O'BRIEN & GERE**  
ENGINEERS, INC.

**Table 3**  
**Honeywell**  
**Tonawanda, NY**  
**Inorganic Data**  
**Storm Sediment Samples**

Compound	Sample ID	Outfall #1	Outfall #1 DUP	Outfall #2	Storm Inlet A	Storm Inlet B
	Sample Date	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg
Aluminum		14800	18600	18300	17600	30000
Antimony		0.29 U	0.31 U	0.26 J	0.73 J	0.46 J
Arsenic		9.0	12.3	11.1	14.5	24.0
Barium		69.3	100	132	112	125
Beryllium		1.4 J	1.7 J	3.3	1.3 J	2.6 J
Cadmium		0.048 U	0.052 U	0.058 J	0.25 J	1.4 J
Calcium		10500	15900	63000	46600	5680
Chromium		38.5	50.2	18.4	41.7	69.9
Cobalt		6.9 J	9.3 J	6.4	10.1 J	19.9
Copper		31.2	55.8	24.0	45.9	103
Cyanide		0.95 U	1.0 U	0.63 U	1.1 U	1.4 U
Iron		46700	52600	21800	30200	47600
Lead		52.1	73.0	31.1	131	60.6
Magnesium		5010	7870	12800	10400	6580
Manganese		379	506	1970	562	509
Mercury		0.18 J	0.33	0.28	0.063 J	0.13 J
Nickel		22.7	37.8	14.5	29.8	55.7
Potassium		1920	2400	1880	3180	3980
Selenium		1.9	2.4	2.8	1.9	3.1
Silver		0.14 U	0.15 U	0.15 J	0.16 U	0.20 U
Sodium		15 J	228	632	315	21 J
Thallium		0.82 J	0.77 U	0.56 J	0.82 U	1.5 J
Vanadium		26.7	35.2	19.2	31.6	53.7
Zinc		193	235	110	201	605

NOTES: U - Not detected J - Estimated value --- - Not analyzed.

**Table 4**

**Former AlliedSignal, Inc.  
Tonawanda, NY**

**Inlet and Outfall Sediment Sample Summary**

VOCs (ug/Kg)	Inlet A		Outfall #1		Inlet B		Outfall #2	
	5/11/99	11/15/00	5/11/99	11/15/00	5/11/99	11/15/00	5/11/99	11/15/00
2-Butanone	2	31	ND	22	ND	ND	ND	ND
Acetone	47	120	95	55	24	ND	110	28
Benzene	ND	ND	27	27	2	ND	780	170
Carbon disulfide	ND	8	2	2J	ND	ND	ND	0.7J
1,2-DCE	ND	ND	ND	2J	ND	ND	ND	5
Ethylbenzene	ND	ND	15	5	ND	ND	2400	300
Methylene chloride	7	7J	1	2J	ND	2J	ND	1J
Styrene	ND	ND	ND	ND	ND	ND	900	6
Tetrachloroethene	ND	ND	ND	ND	ND	ND	55	1J
Toluene	400	ND	7	4J	ND	ND	2200	100
Trichloroethene	ND	4J	13	6	ND	ND	37	14
Vinyl chloride	ND	ND	ND	1J	ND	ND	1	2J
Xylene	ND	ND	ND	11	ND	ND	11000	480
cDCE	ND	ND	35	9	ND	ND	18	10
<b>Total VOCs</b>	<b>456</b>	<b>170</b>	<b>195</b>	<b>146</b>	<b>26</b>	<b>2J</b>	<b>17501.0</b>	<b>1116.7</b>

Total PAHs (mg/Kg) Other SVOCs (mg/Kg)	Inlet A		Outfall #1		Inlet B		Outfall #2	
	5/11/99	11/15/00	5/11/99	11/15/00	5/11/99	11/15/00	5/11/99	11/15/00
Total PAHs (mg/Kg)	65.552	4.1	176.57	1519.67	42.494	72.705	3237.1	2717.4
Other SVOCs (mg/Kg)	0.122	23.26	0.515	2.1	0.072	0.291	253	6.03

Inorganics (mg/Kg)	Inlet A		Outfall #1		Inlet B		Outfall #2	
	5/11/99	11/15/00	5/11/99	11/15/00	5/11/99	11/15/00	5/11/99	11/15/00
Aluminum	16300		24700					
Arsenic	7.3		23.5		11.9		53.5	
Barium						125		132
Beryllium	1J		3.2J		1.3J	2.6J	2.1J	3.3
Cadmium	0.59J		1.9J		0.7J		2J	
Calcium					12000	5680	84600	63000
Chromium	28.2		105					
Cobalt					13.6		16.3J	
Copper	33.6		64.3				4.8	
Cyanide	ND		17.4		ND			
Iron	33800	30200	133000	46700	35300		118000	
Lead	34.8		87.4		31.1		41.3	
Magnesium					7570	6580	18100	12800
Manganese	523		960		514	509	1420	1970
Mercury	0.07	0.063J	0.53	0.18J	0.079	0.13J	0.77	0.28
Nickel	24.7		32.1		32.4		39.9	
Selenium	1.3		6.5		1.3		4.4	
Silver						ND		0.15J
Sodium						21J		632
Vanadium	34.6		43.2					
Zinc	125		446					