



Division of Hazardous Waste Remediation

Record of Decision

Pratt & Letchworth Site

City of Buffalo, Erie County

Site Number 9-15-045

July 1995

DECLARATION STATEMENT - RECORD OF DECISION

PRATT & LETCHWORTH Inactive Hazardous Waste Site Buffalo, Erie County, New York Site No. 915045

Statement of Purpose and Basis

The Record of Decision (ROD) presents the selected remedial action for the Pratt & Letchworth inactive hazardous waste disposal site which was chosen in accordance with the New York State Environmental Conservation Law (ECL). The remedial program selected is not inconsistent with the National Oil and Hazardous Substances Pollution Contingency Plan of March 8, 1990 (40 CFR 300).

This decision is based upon the Administrative Record of the New York State Department of Environmental Conservation (NYSDEC) for the Pratt & Letchworth Inactive Hazardous Waste Site and upon public input to the Proposed Remedial Action Plan (PRAP) presented by the NYSDEC. A bibliography of the documents included as a part of the Administrative Record included in Appendix B of the ROD.

Assessment of the Site

Actual or threatened releases of hazardous waste constituents from this site, were addressed through the implementation of an Interim Remedial Measure (IRM) to remove contaminated soil on the property. No further significant contamination resulting from the disposal of hazardous waste has been determined to be present at the site as addressed in this ROD. A current or potential threat to public health and the environment no longer exists.

Description of Selected Action

During the site investigations, it was determined that the only contaminants of concern at this site were Polychlorinated Biphenyls (PCBs). The PCB contaminated area was remediated during an IRM. The remaining levels of contaminants on site are not considered of any environmental or health concern. Therefore, the No Further Action alternative has been selected for this site.

New York State Department of Health Acceptance

The New York State Department of Health concurs with the remedy selected for this site as being protective of human health.

Declaration

The selected remedy is protective of human health and the environment, complies with State and Federal requirements that are legally applicable or relevant and appropriate to the remedial action to the extent practicable, and is cost effective. This remedy utilizes permanent solutions and alternative treatment or resource recovery technologies, to the maximum extent practicable, and satisfies the preference for remedies that employ treatment that reduce toxicity, mobility, or volume as a principal element.

7/6/95
Date

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Director
Division of Hazardous Waste Remediation

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**RECORD OF DECISION
PRATT & LETCHWORTH SITE
Buffalo, Erie, New York
Site No. 915045**

SECTION 1: SITE LOCATION AND DESCRIPTION

The Pratt and Letchworth site is approximately 18 acres in size and is located at 189 Tonawanda Street in the City of Buffalo, New York. The site is currently owned by 189 Tonawanda Street Corp. As shown in Figures 1 and 2, the site borders Scajaquada Creek on the south, Tops Market on the east, Tonawanda Street on the west and Amherst Street on the north. Industrial and residential properties are located along Amherst Street. There are three buildings on the site. One building is partially demolished, the second is used for storage and the third (the main building) is used for equipment storage and as a residence. The majority of the site is covered with 1-2 feet of soil/clay that was brought to the site in 1992. The site is completely fenced in.

The site subsurface geology (Fig 3) can be characterized as dolomitic limestone bedrock, overlain by 4 to 10 feet of glacial till, and 70 to 80 feet of lacustrine silt and clay. The surface material before placement of a soil/clay cover consisted of fill materials (primarily slag and foundry sand) which ranges in thickness from one foot to more than 18 feet. The silty clay and fill material may temporarily contain perched water, which is not considered a source of groundwater. Bedrock is considered to be a substantial water bearing unit with strong upward hydraulic gradient. The groundwater at the clay/fill interface flows toward the southeast (i.e. Scajaquada Creek) and the bedrock water flows toward the south.

SECTION 2: SITE HISTORY

2.1: Operational/Disposal History

Pratt and Letchworth, a manufacturer of iron products, was formed during the late 1800's and owned the site until 1896. Ownership of the site between 1896 and 1923 is not well documented. Pratt and Letchworth was acquired by Dayton Malleable in 1923 and continued operating as a subsidiary of Dayton Malleable. In 1952, Pratt and Letchworth became an operating company, when Dayton Malleable incorporated. In 1982, the facility ceased operations, when Dayton Malleable became Amcast Industries.

From 1949 to 1965, Pratt and Letchworth landfilled approximately 19,000 tons of foundry sand, and 16,000 tons of slag along the banks of Scajaquada Creek or at the end of the plant property. Approximately 14,000 gallons/year of lubricant and hydraulic oils were also drummed and stored on the site. The on-site stored wastes also included 1,1,1-trichloroethane and alcohol-based binders. Some hydraulic oils and lubricant oils which are suspected to contain PCBS, were believed to be disposed of at the site. During a 1985 site visit by the NYSDEC consultants, approximately 100 leaking drums were discovered at the site, which were subsequently disposed of off site.

2.2: Remedial History

This site was first listed in the registry of Inactive Hazardous Waste Disposal Sites in New York State during 1980. Based upon the findings of elevated levels of PCBs in soil during a State funded Phase II Investigation, the site was reclassified to Class 2 in 1990. The classification 2 means that the site is considered a significant threat to the human health and/or environment and an action is required. The

eastern portion, which contained the major portion of the landfill area (Fig 4), was investigated by Tops Market and was removed from the site in 1990 since no hazardous waste was determined to be disposed of in that portion of the site. The former Plant Building #66 (Fig 2) was also removed from the listed site area in January 1994, because no hazardous wastes were found in this building.

During October 1990, the NYSDEC started negotiating with the current owners who are considered the Potential Responsible Parties (PRPs). The PRPs entered into an Order on Consent in July 1992, to undertake removal of PCBs contaminated soil as an Interim Remedial Measure (IRM) and conduct a site investigation. The delineation of the PCBs contaminated area started in November 1992. However, it was delayed due to placement of a cover of soil/clay and gravel by the PRPs over most of the site. The field work for the delineation of the IRM area and the Site Assessment were completed during January 1993 and February 1993 respectively. The IRM (i.e. excavation of PCBs contaminated soils) was completed during February 1994.

SECTION 3: CURRENT STATUS

3.1: Summary of the Site Investigations

In order to determine the nature and extent of environmental problems, several investigations were conducted at the Pratt and Letchworth Site.

The levels of contaminants found during site investigations were compared to environmental Standards, Criteria and Guidance (SCGs). Groundwater and surface water SCGs identified for this site were based on NYSDEC Ambient Water Quality Standards and Guidance Values. For the evaluation and interpretation of soil and sediment analytical results, NYSDEC soil cleanup guidelines for the protection of groundwater and natural background conditions were used.

The site investigations conducted at this site are summarized below:

Bowser-Morner Sampling-1982:

Three soil samples along the Scajaquada Creek were collected and tested for certain physical (identification of soils) and chemical parameters (metals, phenols, PCBs and total halogenated organics). Three sediment samples were also collected from the Creek along the site and tested for certain metals and PCBs.

Phase I Investigation (NYSDEC) - January 1986)

As part of NYSDEC's review of Class 2a sites, a Phase I Investigation was conducted on the property. The report contains information on the original site which included the former landfill area and Building # 66. This report evaluated the previous sampling data, and site hydrogeology. No field work was done during this investigation.

NUS Investigation (USEPA) - December 1986:

As part of USEPA's review of sites potentially posing a threat to the environment, a site assessment was performed. NUS collected seven soil samples from the site. Two surface water and two sediment samples were also collected from the Scajaquada Creek. Samples were tested for volatile and semivolatile organics.

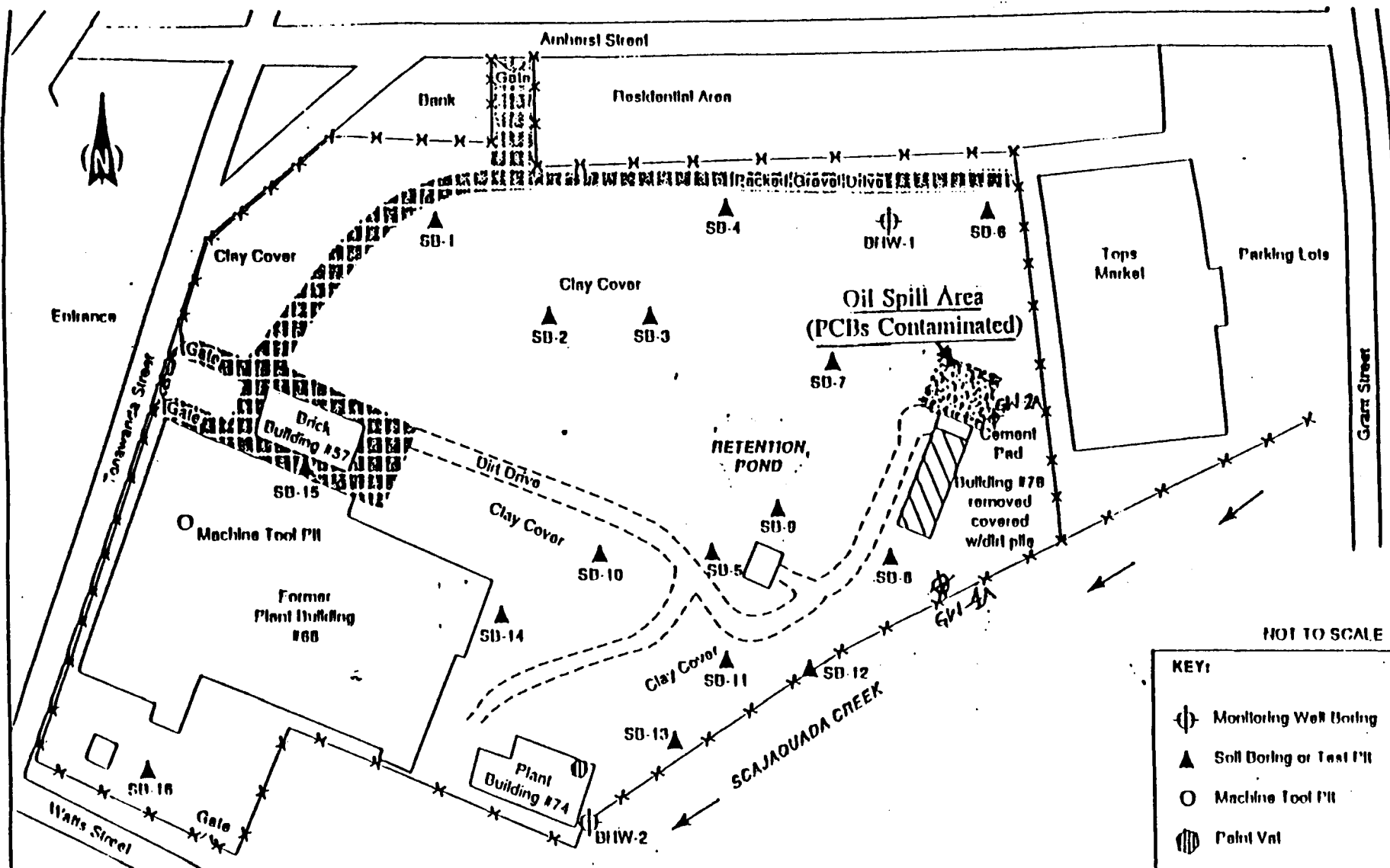
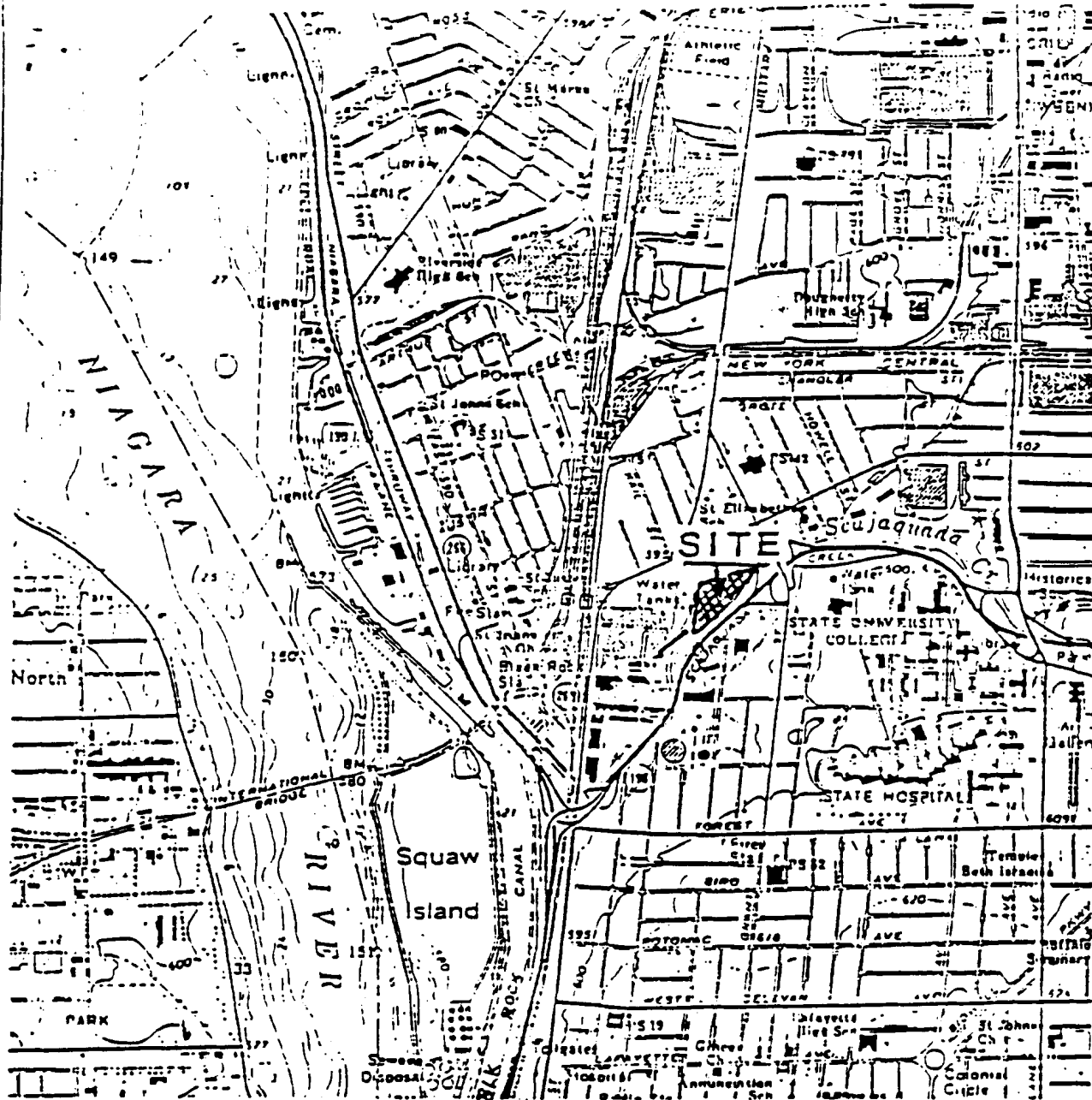
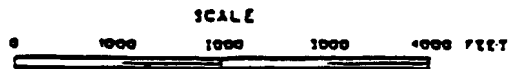


FIGURE 2: Site Characterization Sampling Locations
Pratt & Letchworth, Buffalo, New York



LATITUDE: 42°36'06"
 LONGITUDE: 78°33'49"



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 PHASE II REPORT

FIGURE 1: SITE LOCATION MAP
 PRATT & LETCHWORTH

A
SOUTH

A'
NORTH

GW-4A

GW-3B

GW-1B

500

475

450

425

400

375

ELEVATION IN FEET

0 100 200 FEET

HORIZONTAL SCALE

VERTICAL EXAGGERATION: 4.4X

EXPLANATION:



FILL



CLAY - SILT



TILL



DOLOMITE - LIMESTONE



WATER LEVEL MEASURED ON 11/19/87

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PHASE II REPORT

FIGURE 3: Site Geology

(Cross Section)

Praut & Leitchworth

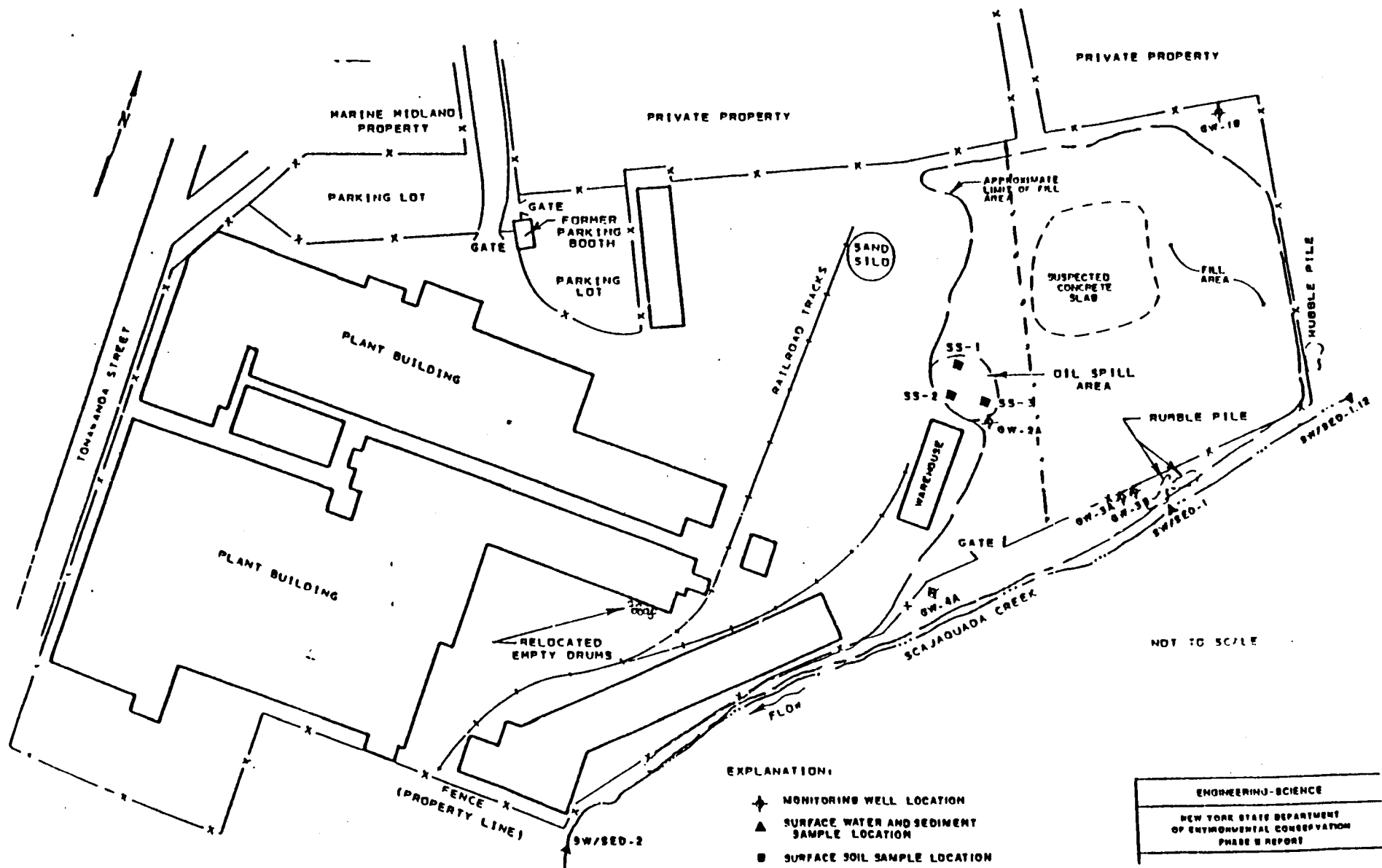


FIGURE 4: Phase II Sampling Locations
Pratt & Letchworth

Surficial soil samples (Fig 5) were tested by E&E between the PCBs contaminated area and the Scajaquada Creek to determine if the Creek could have been impacted by the PCBs contaminated area. The test results showed the surficial soils to contain PCBs less than 1 ppm. The surficial soil samples tested by NYSDEC along the Scajaquada Creek also showed low levels of PCBs (Less than 1.2 ppm).

Subsurface Soil Data (ppm)					
Contaminant	Frequency*	Concentration Range	RSCO	Background	Ref
Arsenic	7	ND-24	7.5	3-12	1
				0.1-73	2
Calcium	8	730-85000	-	130-35000	1
				100-280000	2
Copper	8	7.8-67	25	1-15	1
				1-700	2
Magnesium	8	79-8200		1700-6000	1
				50-50000	2
Manganese	8	30-5700		50-5000	1
				2-7000	2
Mercury	1	ND-0.99	0.1	0.042-0.066	1
				0.01-3.4	2
Nickel	7	ND-25	13	0.5-25	1
Zinc	8	27-400	20	37-60	1
				20-2900	2
Cyanide	1	ND-5.3			
Ref. 1. Background concentrations of elements in soils, NYSDEC Wildlife Resources Center. 2. Element Concentrations in Soils and Other Surficial Materials of the Conterminous United States - Shacklette and Boerngen - 1984. * Frequency of detection out of 8 samples.					

Phase II Investigation (NYSDEC) - June 1989:

The purpose of this investigation was to provide a comprehensive site contamination assessment. The Phase II field investigation included a geophysical survey (to identify any buried drums) and installation of five groundwater monitoring wells. Groundwater, surface water, sediment and soil samples were collected and analyzed for Hazardous Substance List (HSL) organics and inorganics. Sampling locations are shown in Figure 4.

Site Characterization - January 1995

The PRPs contracted Ecology and Environment, Inc. (E&E) to perform a site assessment to determine whether or not any contaminants of potential concern remained outside the PCBs contaminated area. As shown in Figure 2, subsurface soil was characterized by installation of sixteen soil borings and one monitoring well. Waste materials, clay cover, soil (surface and subsurface), and groundwater samples were collected and analyzed during this investigation. The evaluation of the different environmental media is as follows:

Soil

The Bowser-Morner testing of soil from the Creek bank showed leachable levels of metals below the regulatory levels. PCBs were not detected during this investigation. Phenol concentrations were reported to be between 0.31-0.56 parts per million (ppm).

During the Phase II Investigation (before the IRM), surface soil samples showed PCBs from 6.9 to 2200 ppm in the former drum storage area. These levels of PCBs were well above the Recommended Soil Cleanup Objectives (RSCO) of 1 ppm set forth in the NYSDEC's Technical and Administrative Guidance Memorandum (TAGM) HWR 92-4046. Metal concentrations were within the naturally occurring levels for those metals in New York State soils.

As shown in the following table, the Ecology & Environment investigation showed the clay cover to contain beryllium, magnesium, nickel and zinc within the range of natural background levels for all these elements.

Clay Cover Soil Data (ppm)			
Contaminant	Concentration Range	RSCO	Background Concentration (1)
Beryllium	ND-0.75	0.16 or SB	1-7
Magnesium	14000-15000	-	50-50000
Nickel	23-31	13 or SB	5-700
Zinc	68-72	20 or SB	20-2900
(1) Element Concentrations in Soils and Other Surficial Materials of the Conterminous United States- Shacklette and Boerngen- 1984.			
SB: Site Background			

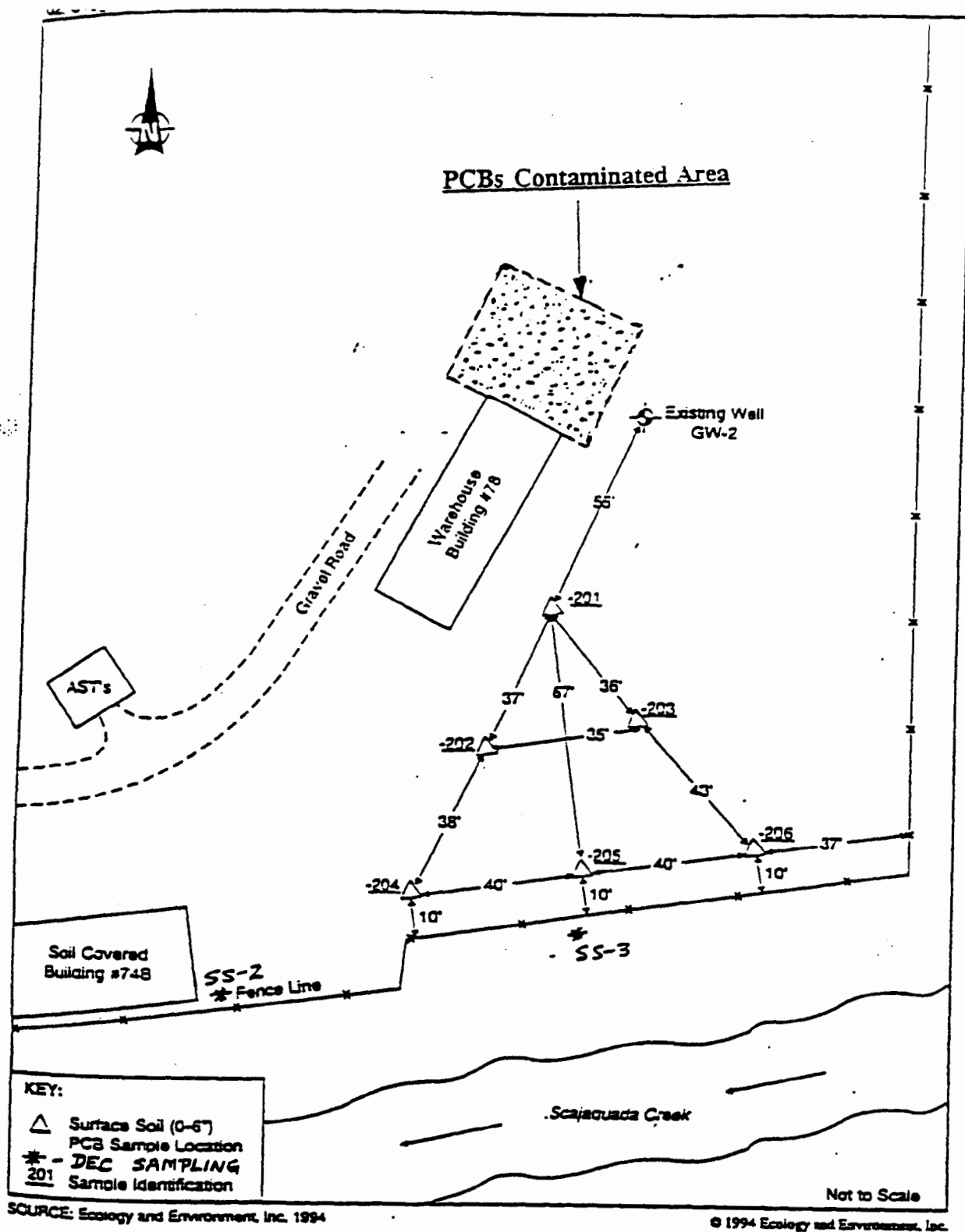


FIGURE 5: Surface Soil Sampling Locations

Eight subsurface soil samples from six soil borings were also tested for Target Compound List (TCL) parameters-organics and inorganics by Ecology & Environment.

As shown in the above Subsurface Soil Data table, several metals (arsenic, calcium, copper, magnesium, manganese, mercury, nickel and zinc) were found above the RSCO, but were within the background values listed in literature for all the metals. Among the organics, levels of Poly Cyclic Aromatic Hydrocarbons (PAHs), volatile organics, semivolatile organics and PCBs were reported below the RSCO.

Sediments

Sediment samples from Scajaquada Creek along the site property were collected during four investigations. The studies conducted by Bowser-Morner (1982) and NUS Corporation (1986) revealed the Creek sediments to contain < 1 ppm of PCBs. The Phase II Investigation (1989) did not show any PCBs in upstream sediments but reported 5.9 ppm PCBs (i.e. 3.1 ppm Aroclor 1260 and 2.8 ppm Aroclor 1254) in the sediment sample collected from the downstream of the site. The NYSDEC (1993) testing of sediment showed 4.2 ppm PCBs (i.e. 3.1 ppm Aroclor 1260 and 1.1 ppm Aroclor 1248) along the site area. This testing also showed that the Creek sediment between Pratt & Letchworth site and mouth of the Scajaquada Creek (Fig 6) is contaminated with PCBs from 0.8 ppm to 4.1 ppm.

It has been noted that as a result of lock closing in the Black Rock Canal, water in the Scajaquada Creek reverses flow direction in the Creek segment from the Black Rock Canal to the dam near Grant Street (Fig 6). The Pratt & Letchworth site lies in this segment. The Creek is quite shallow, therefore, with reversal of flow in the Creek, the downstream Creek sediments are possibly moved upstream. The surficial PCBs contamination between the PCBs contaminated area and the Scajaquada Creek (Fig 5) was found to be below the clean up levels.

The 1984 Niagara River Toxics Committee Report has reported 16 ppm PCBs at the confluence of Scajaquada Creek and Black Rock Canal (Fig 6) and 70 ppm PCBs in a storm sewer upstream from the Pratt and Letchworth site. The 1994 PRAP for the Westinghouse Electric Corporation site also indicates the presence of PCBs (up to 7 ppm) in the U-Crest Ditch. This ditch merges with the Scajaquada Creek near the Buffalo International Airport and is upstream from the Pratt & Letchworth site. This suggests that Pratt & Letchworth is not the only possible contributor to PCBs contamination in the Creek.

Groundwater

Groundwater conditions were evaluated at the site during the Phase II and E&E's investigations. As shown in Figure 4, during the Phase II Investigation, three monitoring wells (two bedrock and one overburden well) were installed in the landfill area. The remaining two overburden wells (GW-2A and GW-4A) are in the current site area. Only one well, BHW-2, was installed during the E&E investigation (Fig 2). No monitoring well could be installed at the BHW-1 location as groundwater was not encountered in the borehole.

The following table shows that the groundwater standards were exceeded for a number of metals. The two wells, GW-4A and BHW-2, which are in the fill area, showed widespread contamination of metals. The metals contamination is believed to be due to foundry sand deposited on site during its operations. No documentation is available to substantiate that metals contamination has resulted from the disposal of any hazardous wastes at the site. GW-2A, which is next to the PCB contaminated area or oil spill area did not show any organic contaminants except Bis (2-ethylhexyl) Phthalate, which is believed to be due to laboratory contamination. Chloroethane and 1,1-dichloroethane were found in GW-4A. PCBs were not detected in any of the three wells

on site. The bedrock wells in the vicinity of the current site area did not show any significant groundwater contamination.

Groundwater Data (ppb)			
Contaminant	Frequency*	Concentration Range	NYSGW Standard
Chloroethane	1	ND-17	5
1,1-Dichloroethane	1	ND-6	5
Bis(2-ethylhexyl) Phthalate	1	ND-488	50
Aluminum	3	15270-59700	-
Arsenic	2	12.2-32	25
Barium	2	158-2021	1000
Calcium	3	53900-211000	-
Cadmium	2	ND-13	10
Chromium	3	34-153	50
Cobalt	1	ND-80	5
Copper	3	55-900	200
Iron	3	23312-312200	300
Lead	3	37-1021	25
Magnesium	3	16700-52000	35000
Manganese	3	946-11138	300
Nickel	2	93-120	13.4
Vanadium	2	ND-258	14
Zinc	3	115-1838	300
* Frequency of finding contaminant out of 3 sampled wells. ppb parts per billion			

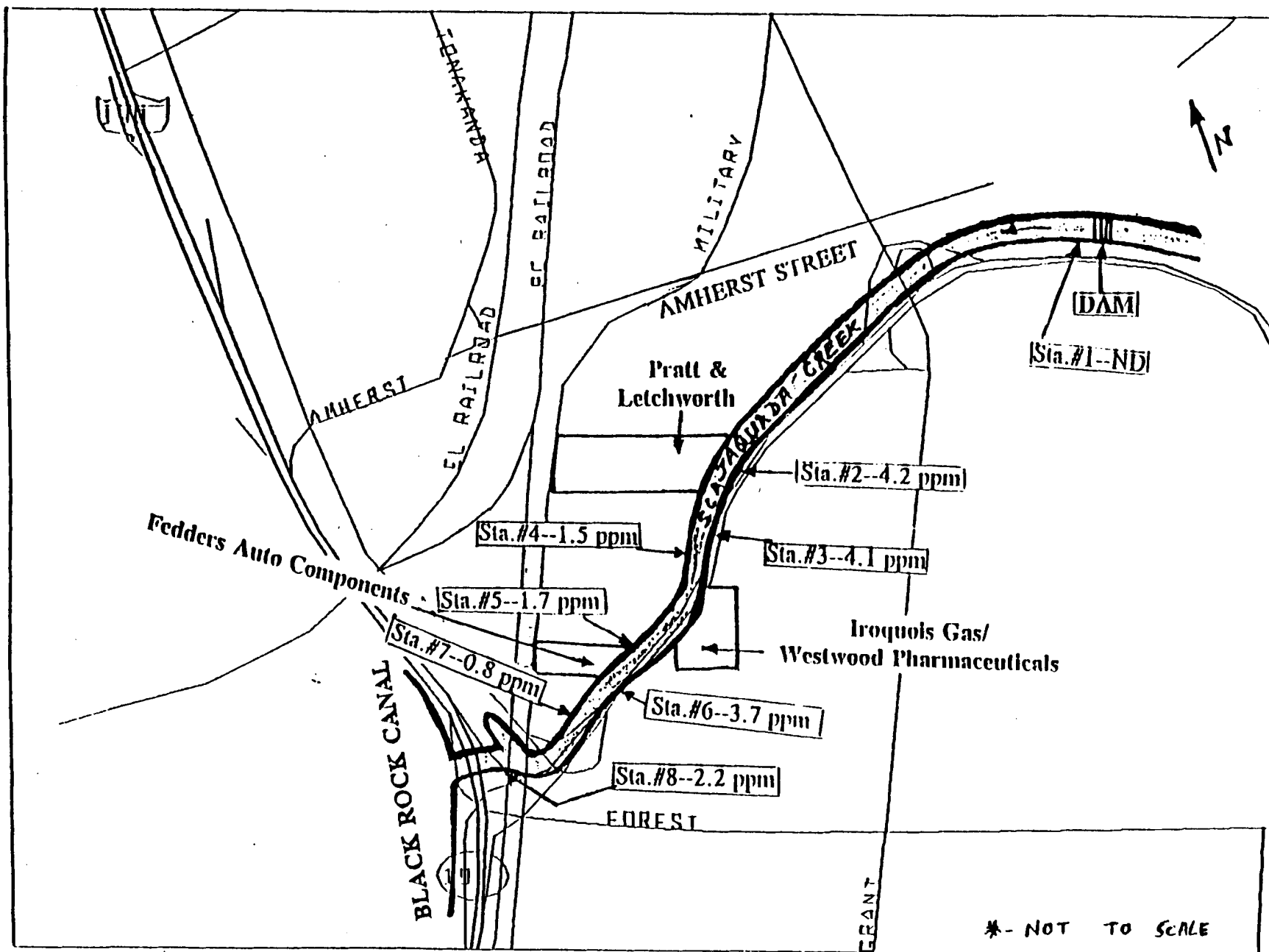


FIGURE 6: 1993 NYSDEC Sampling of Scajaquada Creek Sediments
(Sampling Stations 1-8 shown with PCBs Concentrations)

Surface Water

No surface water sampling was done on the site as surface water was not found. Surface water samples collected from Scajaquada Creek during the Phase II investigation (Fig 4) were analyzed for HSL volatiles, semivolatiles, metals, cyanide and TOX (Total Halogenated Organics). As shown in the following table, the downgradient surface water sample (SW-2) showed 18 ppb of TOX. The concentrations of all metals except for mercury were found comparable in the upgradient and downgradient Creek water samples. For mercury, the higher concentration was found *upstream* from the site.

Scajaquada Creek Surface Water Data (ppb)			
Contaminant	Upstream Conc. Range	Downstream Conc.	NYS Std.
Aluminum	400-405	433	
Antimony	215	197	
Barium	45-70	32	
Chromium	19	16	
Cobalt	15		5
Copper	6	7	
Iron	435-768	633	300
Lead	14-47	62	
Manganese	56	65	
Mercury	2.6	0.4	0.2
Silver	99	93	0.1
Zinc	30-84	81	30
Phenol	4.1		5
TOX		18	

Waste Materials

A tar-like substance sample collected from a tank in the paint vat area (Fig 2) was tested for Resource Conservation and Recovery Act (RCRA) characterization tests (TCLP- Metals, Ignitability, Cyanides and Sulfides). The material was characterized as non-RCRA solid waste. The waste material was disposed of at a licensed disposal facility.

3.2 Interim Remedial Measures:

Interim Remedial Measures (IRMs) are conducted at sites where a source of contamination or an exposure pathway can be effectively addressed before thoroughly investigating the site.

Based upon the results of the site investigations in comparison to SCGs and potential public health and environmental exposure rates, PCBs contaminated area was determined to require remediation. The remediation was undertaken as an IRM. The IRM, which consisted of excavation and off site disposal of the PCBs contaminated soils, was conducted as follows:

Delineation of PCBs Contaminated Soils:

Interim Remedial Measure (E&E-August 1992):

The purpose of this task was to determine the extent of soils contaminated with PCBs above the selected cleanup levels (1 ppm) and to estimate the volume of the soil to be excavated for disposal.

A grid type pattern was adopted to collect soil samples from 50 locations to determine horizontal and vertical extent of the PCBs contaminated area. The first set of samples was taken between 0 to 8 inches. Any soil/clay cover in the IRM area was removed prior to sampling. Where sample results exceeded 1 ppm in 0-8 inches samples, deeper samples were collected. Approximately 100'x100' area was determined to be contaminated during this phase of the IRM, however, when excavation started, the contaminated area turned out to be slightly larger.

Excavation and Disposal of PCBs Contaminated Soils: (September 1993 - February 1994)

Innovative Services International (ISI) was retained by the PRPs to perform this phase of the IRM.

The contaminated area was divided into hazardous and non-hazardous areas. An excavator was used to excavate and load the soils into leak proof plastic lined roll-off containers equipped with water tight covers. Dump trucks were also used for soil that was taken immediately off site. Plastic sheets were placed under each truck as it was loaded to minimize contamination of any area outside the restricted area. Approximately 49 tons of hazardous waste (soils containing greater than 50 ppm PCBs) were disposed of at CWM Chemical Services, Inc. Model City, NY, a permitted Treatment Storage and Disposal Facility (TSDF). Approximately 934 tons of non-hazardous waste (soils containing less than 50 ppm to 1 ppm PCBs) were taken to Lake View Landfill, Erie, Pennsylvania (licensed facility) for disposal.

Any excavated soil which could not be put into the containers on the same day was covered with plastic sheets to protect it from wind and rain. Air monitoring was conducted throughout all intrusive work to protect the workers and the community. All air monitoring results were well below the requirements of the specifications set forth in the August 1992 Health and Safety Plan.

Excavation of the contaminated soil continued until the clean up level (i.e. less than 1 ppm) was met. The areal extent and maximum excavation depths of the cleaned area are shown in Figure 7. The excavated area was backfilled with clean fill.

7. 2

FIGURE 7: Extent of Soil Excavated During IRM
(Areal extent in feet and Depth in inches)

3.3 Summary of Human Exposure Pathways:

An exposure pathway is the mechanism by which an individual is exposed to a contaminant. The five elements of an exposure pathway are 1) the source of contamination; 2) the environmental media (e.g., soil, groundwater) and transport mechanisms; 3) the point of exposure; 4) the route of exposure (e.g. ingestion, inhalation); and 5) the receptor population. These elements of an exposure pathway may be based on past, present, or future events.

- o During the IRM, the PCBs contaminated soil was removed from the site. The excavated area was backfilled with clean fill. Thus any potential for exposure by ingestion, inhalation and dermal (skin) contact has been eliminated.
- o Most of the site is covered with a soil/clay cover, thus eliminating any direct contact with the industrial fill, which contains low level contaminants as discussed in Section 4.1, under Soil .
- o The area along Scajaquada Creek is not covered with clean fill. Ingestion and dermal contact with some low level contamination in the fill, typical of industrial sites, are possible. However, these levels do not warrant additional remediation.
- o Ingestion of contaminated groundwater is another possible way people could be exposed to contaminants. However, the area is served by public water; groundwater is not used as a source of drinking water.

3.4 Summary of Environmental Exposure Pathways:

This section summarizes the types of environmental exposures which may be presented by the site. The following pathways for environmental exposure have been identified.

- o Direct contact with surface fill which shows low levels of contamination along the Scajaquada Creek but is not covered with clean clay cover.
- o Exposure to Scajaquada Creek sediments to aquatic life (benthic organisms).

Scajaquada Creek sediments are contaminated with PCBs, however, a direct link between the Creek contamination and this site has not been found.

SECTION 4: ENFORCEMENT STATUS

Potentially Responsible Parties (PRPs) are those who may be legally liable for contamination at a site. These may include past or present owners and operators, waste generators, and haulers.

The NYSDEC and the 189 Tonawanda Street Corporation, the current owners, entered into a Consent Order on August 3, 1992 (Index No. B9-0349-90-10) to perform a Site Investigation and an Interim Remedial Measure (IRM).

SECTION 5: SUMMARY OF THE REMEDIATION GOALS

Goals for the remedial program have been established through the remedy selection process stated in 6 NYCRR 375-1.10. These goals are established under the overall goal of protecting human health and the environment and meeting all Standards, Criteria, and Guidance (SCGs).

At a minimum, the remedy selected should eliminate or mitigate all significant threats to public health and the environment presented by the hazardous waste disposed at the site through the proper application of scientific and engineering principles.

The goals selected for this site are:

- Eliminate the threat to surface waters by eliminating any future contaminated surface run-off from the contaminated on-site soils.
- Eliminate the potential for direct human or animal contact with the PCBs contaminated soils on-site by performing the IRM.
- Mitigate the impacts of PCBs contaminated groundwater to the environment.
- To the extent practicable, provide for attainment of SCGs for groundwater quality.

SECTION 6: SUMMARY OF THE SELECTED REMEDY

The selected remedy for the Pratt and Letchworth Site is "No Further Action". This remedy is selected because the IRM satisfied the remediation goals. During the IRM, soils contaminated with PCBs above the cleanup level (1 ppm) were excavated and disposed of off site. The excavated area was backfilled with clean fill.

The remainder of the site did not show soil contamination significant enough to warrant any remediation. Approximately 90% of the site is covered with clean clay and gravel, thus greatly reducing any potential for direct contact to humans and animals from the low level contamination found in the fill underneath the newly placed soil/clay cover.

With the removal of PCBs contaminated soils, its migration path by surface water and groundwater has been eliminated. The monitoring wells in the fill area are screened in perched groundwater. The metals contamination found in the fill/clay interface wells reflects the metals in the foundry sands along the Scajaquada Creek. Such levels of metals in the foundry sands are typical of iron and steel manufacturing processes. The bedrock wells in the vicinity of the site were not found to be significantly impacted. The groundwater at site is not used for any industrial or domestic purposes and is not likely to be used in the future.

No direct evidence was found during the investigations to prove that Scajaquada Creek sediments contamination resulted only from the Pratt and Letchworth site.

No known hazardous waste (i.e. PCBs) remains on site. Therefore, the "No Further Action" alternative for this site is acceptable. Also, the site will be removed from the Registry of Inactive Hazardous Waste Disposal Sites in New York State.

SECTION 7. CITIZEN PARTICIPATION

As part of the implementation of the IRM and the Proposed Remedial Action Plan, the following Citizen Participation activities were conducted:

- All important documents pertaining to the Site Investigations and IRM were made available for public review and comment at the document repository.
- A mailing list was developed and a fact sheet was mailed to the public before the start of the IRM.
- An informal mailing was sent to interested individuals/groups announcing the public meeting scheduled for the Proposed Remedial Action Plan (PRAP).
- The public comment period on the PRAP lasted from April 24, 1995 to May 25, 1995.
- A public meeting was held at 191 Tonawanda Street, Buffalo on May 4, 1995 to discuss the PRAP and obtain public comments on it. A Responsiveness Summary that addresses questions and comments raised during the public meeting and comment period is provided as Appendix A.

APPENDIX A
RESPONSIVENESS SUMMARY
for the
PROPOSED REMEDIAL ACTION PLAN
PRATT AND LETCHWORTH SITE
Buffalo, Erie County, NY
Site No. 915045

The Proposed Remedial Action Plan (PRAP) for this site was prepared by the New York State Department of Environmental Conservation (NYSDEC) and issued to the local document repository in April 1995.

The PRAP described the site investigations and the Interim Remedial Measure (IRM). The soils contaminated with PCBs above one part per million were excavated and disposed off site during the IRM.

The proposed remedial action plan recognized the PCB soil removal as a final action and recommended "No Further Action" and delisting of the site. The selected remedy is the same as was proposed.

The PRAP was presented to the public on May 4, 1995 at 191 Tonawanda Street, Buffalo, NY. The questions raised by the public during that meeting, and other questions received during the public comment period (which ended on May 25, 1995), and the State's responses are as follows:

- 1.Q. What the property will be used for, once it is removed from the registry?
 - A. At present, the future use of this property is not known. [Note: The current owners indicated that there has not been any commitment from any developer so far.]
- 2.Q. Who paid for the clean up of the PCBs contaminated area?
 - A. The current owners (191 Tonawanda Street Corp.) entered into a legal agreement with the State to clean up the PCBs contaminated area and paid for its clean up.
- 3.Q. How much money was spent by the State on this site?
 - A. To date, the State has spent \$103,849 from its State Superfund.
- 4.Q. The Scajaquada Creek is very contaminated and needs to be cleaned up.
 - A. Scajaquada Creek has long been an urban creek, receiving storm runoff and industrial discharges for over 100 years. Environmental sampling of the creek has shown many instances of industrial and urban pollution. Much work has been accomplished over the past decade to remove sources of urban and industrial pollution sources. A sediment cleanup of Scajaquada Creek near the Westwood Pharmaceutical facility will begin in 1996.
- 5.Q. What will be the health impacts from the fill materials remaining on site?

- A. The levels of contaminants (primarily metals) remaining at site are typical background levels found in industrial areas. The newly placed soil/clay cover over the site eliminates direct human contact with the subsurface fill materials.
- 6.Q. If the owners of the homes next to the site need to sell their homes, do they have to disclose during listing their property that their property is next to an Inactive Hazardous Waste Disposal site?
- A. The homes along the site are not part of the listed site. In addition, this site will be removed from the Registry of Inactive Hazardous Waste Disposal Sites. However, this is a legal question and should be directed to a real estate attorney.

APPENDIX B

ADMINISTRATIVE RECORD

**Pratt & Letchworth Site
Buffalo, Erie County, New York**

Site No. 915045

Date	Document
1982	Bowser-Morner Sampling
January 1986	Phase I Investigation (NYSDEC)
December 1986	NUS Investigation (USEPA)
June 1989	Phase II Investigation (NYSDEC)
August 1992	Interim Remedial Measures Work Plan (Ecology & Environment)
August 1992	Order on Consent
October 1992	Work Plan Acceptance Letter from Jaspal S. Walia to Scott Thorsell
May 1994	Certificate of Completion (Innovative Services International)
January 1995	Site Characterization Report (Ecology & Environment)
April 1995	Proposed Remedial Action Plan
June 1995	Record of Decision