NEW YORK STATE
DEPARTMENT OF ENVIRONMENTAL CONSERVATION
Division of Environmental Remediation
Albany, New York 12233-7013

FACT SHEET

PROPOSED FINAL CORRECTIVE MEASURES

GE BUFFALO SERVICE SHOP
Tonawanda, New York
Erie County

USEPA ID No.: NYD067539940

November 14, 2011

The New York State Department of Environmental Conservation (Department) has determined that hazardous wastes or hazardous constituents were released into the environment at the GE Buffalo Service Shop, located in the Town of Tonawanda, Erie County, New York. As required by GE Buffalo Service Shop's 6NYCRR Part 373 Hazardous Waste Management Permit (Permit No. 9-1464-00044/00001-0), the facility has completed an investigation of the releases and has determined that the releases resulted from past waste management practices. The Department has determined that corrective measures are necessary for the facility.

This fact sheet includes a brief summary of the site investigations and interim corrective measures which were performed and the proposed Final Corrective Measures for addressing the contamination at the site. In addition, the fact sheet requests public review and comment on the proposed Final Corrective Measures.

Selection of the Final Remedy to Address Contamination

The Department has selected a proposed final remedy for the GE Buffalo Service Shop and has determined that the proposed remedy will be protective of human health and the environment. Implementation of the remedy will not commence until the Department reviews and responds to any public comments on the proposed actions. Changes to the proposed corrective measures or the selection of an alternative remedy may be made if public comments or additional data indicate that such changes would result in a more appropriate solution.

RCRA Facility Investigations

The RCRA Corrective Action process began with investigations to evaluate potential areas of the facility that may have been impacted by a release of hazardous wastes and/or hazardous constituents. Based on the results of the investigations, the Department has determined that hazardous wastes and/or hazardous constituents have been released at the GE Buffalo Service Shop. Pursuant to the requirements of the 373 Permit, GE characterized and evaluated the impacts of releases at Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) through the RCRA Facility Assessment (RFA) and RCRA Facility Investigations (RFI). The RFA and RFI were completed for the facility in 1988 and 1998, respectively. The results of the RFI indicated that the concentrations of selected constituents (primarily PCBs) at the Service Shop exceeded the New York State groundwater standards and the established site cleanup objective. The established site cleanup objective for PCBs in surface soil is 1ppm and subsurface soil is 10ppm. Surface soil is defined as the top foot of soil. Based on sampling results, the Department determined that corrective measures were required.

A summary of findings from the investigations including contaminants and areas identified for corrective measures are described below:

- Overall, soils and groundwater at the site have not been significantly impacted with VOCs.

- PCBs at concentrations in surface soils that exceed 1 ppm were found in an approximately 18,000 square foot area near the rail spur in the northeast part of the site. The maximum PCB concentration found was 379.9 ppm using a field kit and 160 ppm via laboratory analysis.

- The concentrations of PCBs in subsurface soil samples that exceed 10 ppm were detected near the former rinse water tank and in soils along the sewer lines near a former tank excavation. PCBs contamination above 1 ppm has not been found to extend below depths of 12 feet.

- The sub-slab soils in the area of the truck bay and depressed dock have not been significantly impacted by PCBs.

- The sediments in the truck bay trench and sump contain PCBs. The maximum PCB concentration detected in the sediments was 241 ppm.

- The only area where the shallow groundwater is impacted at the site is in the former rinse water underground storage tank (UST) excavation and in the fill along the sewer lines on the east side of the building. Groundwater in these areas is shallow and therefore would not be expected to create a contaminant plume.

- Based on sampling results from a deep monitoring well installed near the former rinse water tank the groundwater did not contain PCBs or VOCs.

- The soils surrounding the RCRA Container Storage Area (CSA) have not been significantly impacted by either PCBs or VOCs.

- The soils south and southeast of the PCB CSA and PCB Work Area have not been significantly impacted by PCBs.

Interim Corrective Measures (ICM)

If at any time it is determined by the Department that a release or threatened release of hazardous wastes and/or hazardous constituents from a SWMU, an AOC, or a combination of SWMUs or AOCs poses a threat to human health or the environment a draft interim corrective measure study must be submitted to the Department. Based on the results of investigations, GE has implemented interim corrective measures at the buffalo Service Shop, with oversight and approval from the Department.

Off Site and On Site Storm Sewer

The Department determined based on site investigations that the potential existed for PCBs to leave the facility through the storm sewer system. The on-site storm sewer system drains through storm sewer manhole, STMH-1, near the southwest corner of the Service Shop. From there, the facility system connects to the municipal storm sewer system at Milens Road. This section of the municipal storm sewer system discharges to Two Mile Creek near Oriskany Drive. PCBs were detected in sediment samples collected from within the storm sewer system both onsite and offsite. The highest level of PCB concentration in sediments (41,300 ppm) was found at onsite manhole, STMH-3, which is near the southeast corner of the service shop building, followed by the first off-site manhole, MH-1 (300 ppm). The concentrations of PCBs in storm sewer sediments decreased significantly after MH-1. GE removed the sediments from the on-site manhole STMH-3 and the off-site manhole MH-1, where the concentrations in this section were greatest as part of an interim corrective measure. This removal prevented further releases of site related contaminants from being released into the creek from this section of the site storm sewer system.

Two Mile Creek

Based on results of the site storm sewer investigations, it was determined that PCBs were released to Two Mile Creek through the storm sewer outfall at Oriskany Drive. This section of the creek runs through the Sheridan Park Golf Course and receives storm water from both surface runoff and point discharges. The Department required GE to conduct investigations of the creek between the storm sewer outfall and Route 290 to evaluate the extent of PCB contamination in the sediments and along the banks. Based on the investigations, the Department determined that removal of sediments and bank soils in select areas were necessary to minimize the impact of contamination. The

detected PCB concentrations downstream of the storm sewer discharge ranged from 0.086 to 4.8 ppm in sediment samples and from 2.2 to 6.3 ppm in soil samples from the banks. The removal of the sediments and bank soils by the Permittee coincided with stream improvement work conducted by the Town in April 2008. The Town improved the flow in Two Mile Creek by dredging sections of the stream, removing trees and shoals, stabilizing stream banks and replacing bridges. Based on confirmatory sampling, the Department has determined that the PCB contaminated sediment and bank soil removal operations have met the cleanup objective of 1ppm except for one area on the western bank. This area is scheduled for removal during Spring of 2012. The Department has determined that the ICMs conducted and pending will serve as the final corrective measures for the facility in relation to Two Mile Creek.

Transportation Corridor, Depressed Dock and Truck Bay

Sampling results submitted as part of the Closure Certification Report for the Commercial PCB Storage Area indicated samples were above the established site cleanup objectives in select locations. Based on the results, the Department requested a focused corrective measures study for the transportation corridor, depressed dock and truck bay. GE performed interim corrective measures to prevent contamination from leaving the facility until a final remedy is selected for these areas. In the transportation corridor and the adjacent areas, the pavement with PCB concentrations greater than 1 ppm were removed to the extent possible. The confirmatory sampling of the transportation corridor showed concentrations greater than the established cleanup objective of 1 ppm but less than 25ppm, the cleanup level established by TSCA for low occupancy areas such as parking lots. After the removal a 1 ½ inch layer of asphalt was placed over the removal areas. In the northeast bay and depressed dock, concrete in poor condition was removed and repaired. The entire concrete slab floor, except the two areas previously decommissioned, were double washed and double rinsed. Subsequently, the floor was coated with two contrasting color coats of epoxy and labeled with the PCB "Mark M_L". The "Mark M_L" is a 6" x 6" square label with black striping around the border that includes the warning "Caution Contains PCBs". This work was done with USEPA oversight in accordance with federal TSCA regulations.

Final Remedy for the Facility

The Final Corrective Measures proposed by the Department includes the ICMs already undertaken by the facility, Alternative 2 – Remove and Replace Concrete Ramp, Complete Asphalt Overlay and Maintain Epoxy Coating and Asphalt described in the Focused Corrective Measures Study (CMS) Report dated July 13, 2011 and Alternative 4 - Surface and Subsurface Soil Excavation and Off Site Disposal described in the Revised CMS Final Report dated July 31, 2001.

Alternative 2 (focused CMS): Remove and Replace Concrete Ramp, Complete Asphalt Overlay and Maintain Epoxy Coating and Asphalt Cover: This alternative includes the interim corrective measures already implemented for the transportation corridor at the facility. Once accessible, the asphalt pavement where equipment is being stored, along the south and east fences, would be sampled to determine if the asphalt surface has been impacted by PCBs. If appropriate, the top inch of asphalt would be removed and a 1½ inch layer of asphalt would be installed over this area. The concrete ramp that leads to the depressed dock on the south side of the building would be sampled to determine if the concrete has been impacted by PCBs. If appropriate, the concrete ramp would be removed and replaced. Annual operation and maintenance activities would ensure that the epoxy floor coating and the asphalt topcoat remain in good condition and continue to serve as effective barriers. The environmental easement to the property would note the presence of residual PCBs in the concrete floor slab below the epoxy coatings, and in the pavement south of the building. The environmental easement would prohibit disruption of the asphalt topcoat and the epoxy coating, and would require the owner of the property to inspect and maintain both cover systems.

Alternative 4 (CMS): Surface and Subsurface Soil Excavation and Off-site Disposal: This alternative involves excavation of contaminated surface soils that exceed 1ppm PCB and excavation of contaminated subsurface soils that exceed 10 ppm to a maximum depth of six feet in the areas surrounding the rail spur, old oil/water separator, sewer lines and former rinse water tank excavation (approximately 2,367 cubic yards of soil). Excavated soils would be transported off-site for disposal at a permitted facility. These areas would be backfilled with clean fill and restored by seeding or paving. An 80 foot section of the storm sewer and sanitary sewer in the excavated area east of the building would be removed and replaced. The remainder of the on-site storm sewers and the off-site sewers along Milens Road would be cleaned to remove residual contamination. Groundwater and stormwater would be monitored for a minimum of five years. The facility would be required to develop a Groundwater and Storm Water Monitoring Plan to be reviewed and approved by the Department. As a result, Alternative 4 would not require long term monitoring and maintenance of caps compared to other Alternatives. In addition, groundwater and storm water

monitoring would be expected to be significantly reduced by choosing Alternative 4 relative to the other Alternatives since all known potential source areas will be removed. Alternative 4 would eliminate the risk of direct contact with contaminants, off-site migration and infiltration through impacted soil.

The final remedy will include imposition of an institutional control in the form of an environmental easement and compliance with a Department approved Site Management Plan.

Post-Remedial Monitoring

The facility will perform groundwater monitoring for a minimum of five years. The Department will evaluate the monitoring data to determine if additional remedial activities are warranted.

Document Availability

Copies of the Reports, Fact Sheet and Statement of Basis are available for inspection at the:

Department of Environmental Conservation
Region 9 Office
270 Michigan Avenue
Buffalo, NY 14203-2999
Contact Person: Kate Emery
Telephone: (716)851-7220

Department of Environmental Conservation
Division of Environmental Remediation
625 Broadway
Albany, NY 12233-7013
Contact Person: Jessica LaClair
Telephone: (518)402-9821

and

Parkside Village Branch Library
169 Sheridan Parkside Drive
Tonawanda, NY 14150
Telephone: (716)873-2861

How to Provide Your Comments

The Department seeks input from the community on the proposed final remedy for the facility. The public is also invited to provide comments on accepting the Interim Corrective Measures conducted in Two Mile Creek as part of the Final Remedy. The public comment period has been set for November 14, 2011 to January 6, 2012. This is an opportunity for public participation in the remedy selection process. The Department may modify the proposed remedy or select another of the alternatives presented in this Statement of Basis based on new information or public comments. Therefore, the public is encouraged to review and comment on the proposed remedy identified herein. All comments will be considered by the Department in selecting the Final Remedy for the GE Buffalo Service Shop. Upon approval of the Final Corrective Measures, a response to any comments submitted will be issued, which will identify any changes from the proposed alternatives and will describe and respond to any issues raised. Comments received by January 6, 2012, will be summarized and addressed in a responsiveness summary. A responsiveness summary will be sent to each person who submits written comments or who requests such notice.

Comments must be sent to: Kathleen Emery, NYSDEC Region 9 Office, 270 Michigan Avenue, Buffalo, New York 14203-2999, telephone: (716) 851-7220, email: khemery@gw.dec.state.ny.us or Jessica LaClair, NYSDEC Division of Environmental Remediation, Remedial Bureau D, 12th Floor, 625 Broadway, Albany, NY 12233-7013, telephone (518) 402-9821, email: jalaclai@gw.dec.state.ny.us. In lieu of, or in addition to the submission of written comments, any interested person may request a public hearing. Any request for a public hearing, must be in writing and must state the nature of the issues proposed to be raised in the hearing. All comments and/or requests for a public hearing must be submitted no later than January 6, 2012.