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1987-07-01. RFA-Report-  
Preliminary-Review

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GE Buffalo

RCRA Facility Assessment Report  
Preliminary Review

General Electric Company

Buffalo Service Shop  
Tonawanda, New York

EPA ID No. NYD067539940

July 1987

Recommendations

One of the objectives of a RCRA Preliminary Review Report is to identify releases of, or the probability of releases of hazardous wastes and/or constituents from solid waste management units (SWMUs) at a facility through review of available literature.

Available reports which contain environmental information concerning past and/or present practices at GE Buffalo Service Shop were reviewed. The results of this review produced twelve areas of concern (SWMUs). These SWMUs are outlined on the chart below. This chart also reflects recommendations for the next phase of activity at each unit, based on the results of this Preliminary Review.

<u>Unit</u>	<u>Location**</u>	<u>No Action</u>	<u>RFA Sampling Visit</u>	<u>RCRA Facility Investigation (RFI)</u>	<u>Corrective Measures</u>
RCRA CSA	A		X		
PCB CSA	B		X		
Waste Oil CSA	C	X			
Waste Accumulation CSA	D1/D2	X			
Scrap Oil Tank (AG)	E	X			
Rinse Water Tank (BG)	F	X*			
Virgin Oil Tanks (AG)	G		X		
Fuel Oil Tanks (BG)	H	X			
PCB Work Area	I				X
Oil/Water Separators	J1/J2			X	
Floor Drains & Sewers	K				X
Rail Spur	L		X		

\*Approved Closure Plan exists for this unit.

\*\*See Attached Facility Map

AG - above ground      BG - below ground      CSA - Container Storage Area

The underground rinse water tank at GE was removed in 1986. The tank is being closed according to a NYSDEC approved closure plan.

## Introduction

In February of 1987, Lawler, Matusky and Skelly Engineers did an environmental study of GE Buffalo Service Shop.

In November of 1986, General Electric produced a report entitled "Underground Tank Removal and Soil Sampling Project." This report described work performed in accordance with the partial closure plan for the underground tank.

These documents provide information evaluated in this report. Additional sources of information used were the SWMU facility questionnaire, NYSDEC files, Part 373 application, and inspection reports.

## Facility Overview

General Electric Company operates an apparatus service shop at 175 Milens Road in Tonawanda, New York. The shop property comprises 4.6 acres. To the west of the facility is Milens Road and a soft drink bottling plant. To the south is a cold storage warehouse. The Youngman Expressway borders the northern side of the facility, and the land is vacant on the east side.

Prior to development by GE in 1968, this site was vacant. In 1972, the office and an additional bay were added to the original structure. A second expansion on the south side of the original building was completed in 1978.

The ground surface is generally level in the vicinity of the GE facility. Surface water flows through the storm water sewers into Two Mile Creek. Two Mile Creek is about half a mile west of the facility and flows into the Niagara River. The Niagara River is about a mile and a half northwest of the site.

The facility repairs industrial equipment including electric motors, transformers, turbines, pumps, etc. Major operations entail machining, cleaning (solvent, alkaline, sand, and steam), assembly, baking, welding, winding, painting, and material (including waste oils) handling. The motor repair operations are centered in the southwest corner of the building. Transformer repair and decommissioning operations are in the southeast corner, and general machining is done in the northern half of the building. Wastes generated on-site include EPA Hazardous Waste Numbers D001, D002, D004 - D011, F001, and F003. Wastes generated on-site or received for repairs from off-site include DEC Hazardous Waste Numbers B001-B007. Asbestos waste from old transformer and motor insulation and waste oils are also generated on-site.

At the present time, there are four RCRA regulated units at GE Buffalo Service Shop: a PCB Work Area, a PCB container storage area, a RCRA container storage area and an underground rinse water tank. Four indoor tanks have been proposed to be added for waste management. They would store the following: PCB oil with concentrations greater than 25,000 ppm

PCB, PCB oil with concentrations between 50 and 25,000 ppm PCB, kerosene, and waste kerosene (kerosene and PCB oil). A closure plan has been approved by NYSDEC for the underground rinse water tank.

## Unit Description

### A. RCRA CSA

#### 1. Unit Conditions

The RCRA CSA has operated since 1980, storing 55 gallon steel drums. This unit consists of a 11' x 32' area on a 6 inch thick concrete pad located directly outside the facility's east wall. Secondary containment is provided by a 8" H x 6" W concrete curb which can hold 1176 gallons. The floor and curbs are sealed with two coats of epoxy. Protection from precipitation is provided by a galvanized metal roof and fiberglass side walls. The roof and siding were installed in 1986. Security is provided by a locking fence surrounding three sides of the area, with the building wall on the fourth side. The maximum capacity is 36 drums.

This unit is inspected weekly for signs of leaks or deterioration. Drums are not stacked on top of each other to prevent structural failure and proper aisle space is provided for inspection purposes. Containers are kept closed during storage and are stored 50 feet from the facility's property line. Average residence time for the wastes is 6 to 9 months.

It currently stores EPA Hazardous Waste Numbers D001, D002, D006, D007, D008, and F001. In the past, D004, D005, D009, D010, D011, and F003 wastes were stored in this unit. Hazardous waste constituents include arsenic, barium, cadmium, chromium, lead, mercury, selenium, silver, tetrachloroethylene, trichloroethylene, methylene chloride, 1,1,1-trichloroethane, carbon tetrachloride, chlorinated fluorocarbons, xylene, acetone, ethyl acetate, ethyl benzene, ethyl ether, methyl isobutyl ketone, n-butyl alcohol, cyclohexanone, and methanol.

The potential pollutant dispersal pathways of concern are soil and groundwater via spills or leaks from the drums. Surface water releases, air releases, and subsurface gas generation are unlikely from this unit.

#### 2. Release Description

Three surface (1.5' - 2' deep) soil samples were taken around this unit. Trace levels of six volatile organic compounds (VOCs) were detected, while 29 other VOCs were not detected.

3. Target Populations or Environments

Groundwater generally flows east to west under the facility. Confinement and perching of infiltration is known to exist at the site. Groundwater is not expected to be used for drinking since there is a water supply system in Tonawanda.

4. Recommendations

Soil sampling during a site investigation (SI) is recommended to confirm that no releases have occurred.

B. PCB CSA

1. Unit Conditions

The PCB CSA has operated since 1978, storing 55 gallon steel drums. This unit has separate secured access only from the exterior of the facility and is used for storage of PCB items prior to shipment to qualified disposal sites. The PCB CSA is located within a room in the southeast corner of the building. This unit consists of a 21' 6" x 24' 6" area located on a 6 inch thick concrete floor. Secondary containment is provided by a 16"H x 9"W concrete curb which can hold 4918 gallons. A sump, approximately 3' x 3' x 3', is located north of this unit just outside of the curbing. The maximum capacity is 75 drums.

This unit is inspected weekly for signs of leaks or deterioration. Average residence time of the wastes is one month.

This unit stores wastes having DEC Hazardous Waste Numbers B001, B002, B003, B004, B005, B006 and B007. These consist of PCB contaminated solids, liquids and articles.

The potential pollutant dispersal pathway of concern is air releases. This would be possible from spills or leaks that were not completely cleaned up, leaving residual PCB contamination. Surface water, groundwater, soil and subsurface gas releases are unlikely from this unit.

2. Release Description

No known releases have occurred from this unit.

3. Target Populations or Environments

The GE employees and the Tonawanda residents could be affected. Approximately 65,000 people live within a 5 mile radius of the facility.

#### 4. Recommendations

Soil sampling during a SI is recommended in the area outside this unit to confirm that no releases have occurred.

### C. Waste Oil CSA

#### 1. Unit Conditions

The Waste Oil CSA is located within the same curbed area as the scrap oil tank in the southeast corner of the facility. This unit has operated since 1980, storing 55-gallon steel drums. This unit consists of the southern end of a 17'4" x 14'10" area on a 6 inch thick concrete floor. Secondary containment for this unit and the scrap oil tank is provided by a 24"H x 10"W concrete curb which can hold 3800 gallons. The maximum capacity is 15 drums.

This unit is inspected weekly for signs of leaks or deterioration. Average residence time of the wastes is 1 to 2 months. This unit stores waste motor oil and lubricating oil.

Air, surface water, groundwater, soils and subsurface gas releases are unlikely from this unit. Any spills would be contained by the curbing or would not migrate far enough to be released to any pollutant dispersal pathway.

#### 2. Release Description

No known releases have occurred from this unit.

#### 3. Target Populations or Environments

Not applicable.

#### 4. Recommendations

No further action is recommended for this unit.

### D. Waste Accumulation CSA

#### 1. Unit Conditions

There are two locations inside the facility that are used to accumulate solid and hazardous waste in containers. Location D1 is a 3' x 15' area that stores four 55-gallon steel drums and three plastic garbage cans. This unit has operated since 1980 and stores EPA Hazardous Waste Numbers D001, D002 and F001. Hazardous constituents include tetrachloroethylene, trichloroethylene, methylene chloride, 1,1,1-trichloroethane, carbon tetrachloride and chlorinated fluorocarbons. The average residence time of these wastes is 3 to 6 months. Waste liquids are accumulated in

the steel drums and empty product containers are accumulated in the plastic garbage cans.

Location D2 is a 2.5' x 6' area that stores three 55-gallon steel drums. This unit has operated since 1980 and stores EPA Hazardous Waste Number D001, waste motor/lubricating oil, and asbestos waste. The average residence time is 3 to 6 months for D001 waste, 4 months for waste oil, and 6 months for asbestos waste.

The containers in these accumulation areas are kept closed, except when waste is being added.

The potential pollutant dispersal pathway of concern is surface water releases through the floor drains. Air, groundwater, soil and subsurface gas releases are unlikely from this unit.

2. Release Description

No known releases have occurred from this unit.

3. Target Populations or Environments

Surface water flows through the storm water sewers into Two Mile Creek, a class B stream, which is about half a mile west of the facility. Two Mile Creek flows into the Niagara River, a class A special stream, which is about a mile and a half northwest of the facility. Two Mile Creek is not used for drinking water, but the Niagara River is.

4. Recommendations

The plastic garbage cans should be carefully visually inspected for holes or thin spots every time they are emptied. Plastic garbage cans found with holes or thin spots should be discarded and replaced. This will ensure that leaks do not occur. Other than this, no further action is recommended for this unit.

E. Scrap Oil Tank

1. Unit Conditions

The Scrap Oil Tank is located within the same curbed area as the Waste Oil CSA in the southeast corner of the facility. This tank was installed in 1979 and is a horizontal, top filling, 2,000 gallon capacity steel tank. The tank sits directly on the 6 inch thick concrete floor in the northern end of a 17'4" x 14'10" area. Secondary containment for this unit and the Waste Oil CSA is provided by a 24" H x 10" W concrete curb which can hold 3800 gallons.

This unit is inspected daily for liquid level, discharge control equipment, leaks, and spills, and it is inspected weekly for leaks or deterioration, foundation, and curbs. It is registered with NYSDEC's petroleum bulk storage program. The top filling opening is covered when the tank is not in use. The average residence time of the wastes is 3 months.

This unit holds waste electric motor oil, lubricating oil, and transformer oil with PCB concentrations less than 50 ppm.

The potential pollutant dispersal pathway of concern is surface water via an accident during tank emptying operations. Air, groundwater, soil and subsurface gas releases are unlikely from this unit.

2. Release Description

No known releases have occurred from this unit.

3. Target Populations or Environments

Surface water flows through the storm water sewers into Two Mile Creek, a class B stream, which is about half a mile west of the facility. Two Mile Creek flows into the Niagara River, a class A special stream, which is about a mile and a half northwest of the facility. Two Mile Creek is not used for drinking water, but the Niagara River is.

4. Recommendations

No further action is recommended for this unit.

F. Rinse Water Tank

1. Unit Conditions

The rinse water tank was installed in June 1977 and was designed to hold wash water from the trench drain and sink in the PCB work area. The tank held water contaminated with PCB oils. In November of 1982 this tank was put in no-use status, and all inlets were sealed and the wash sink was disconnected. This tank operated for five and a half years. In May of 1983 the tank contents were removed and disposed of as PCB liquid. The tank was decontaminated in December of 1983 and rinsed with solvent.

This tank was a 2,000 gallon capacity, carbon steel tank located 4 feet below grade. The tank had a cutoff valve but no secondary containment. The tank was anchored by an underlying concrete ballast pad and tie down straps. The tank had a manhole for access and was backfilled with pea gravel.

An annual level test was performed on the tank when it was in use. The average residence time of the wastes was one year.

The rinse water tank is being closed in accordance with a closure plan approved by NYSDEC. The tank was excavated on October 14, 1986 and found to have no signs of excessive corrosion. The natural overburden at the site is clayey-silt. During excavation, a perched water table confined within the original excavated area was found. The remaining liquid in the tank was removed and disposed of. The tank piping was cut at the building. The outside piping was excavated and disposed of. The tank and the concrete block securing the manway entrance were also disposed of.

The potential pollutant dispersal pathways of concern are soil and groundwater. Air, surface water, and subsurface gas releases are unlikely from this unit.

## 2. Release Description

A PCB release probably occurred from overflowing the tank. An oil film was present on the water in the excavation. Four samples were taken around this unit, on one each side. All showed trace levels of PCBs at a depth of 11 to 12 feet. Two samples were taken at the tank and found to have PCB contamination.

## 3. Target Populations or Environments

Groundwater generally flows east to west under the facility. Confinement and perching of infiltration is known to exist at the site. Groundwater is not expected to be used for drinking since there is a water supply system in Tonawanda.

## 4. Recommendations

No further action is recommended for this unit. The closure activities will be reviewed as part of the certification of closure process.

## G. Virgin Oil Tanks

### 1. Unit Conditions

Two Virgin Oil Tanks are located to the east of the facility. They were installed in April of 1970 and are still in service. Both tanks are horizontal, 6,000 gallon capacity, riveted steel tanks. They are above ground and are supported by concrete saddles on concrete pads. The ground within the containment area was covered with crushed stone. A concrete floor was poured over the crushed stone in the containment area in 1987. Secondary containment is provided by a 3 foot high concrete wall surrounding both tanks. No product gauging or leak detection is provided.

Steel product dispensing pipes travel underground to the building's interior. A drain exists in the concrete floor between the two tanks. This drain was reported to have been filled in. A PVC pipe still leads from this drain to the outside of the containment wall. A dike drain was recently installed with a locking valve.

This unit stores virgin 10CA oil used to fill reconditioned transformers. This unit is registered with NYSDEC's petroleum bulk storage program.

The potential pollutant dispersal pathways of concern are soil and groundwater. Air releases, surface water releases, and subsurface gas generation are unlikely from this unit.

## 2. Release Description

The ground within the containment area used to slope from north to south. The soil was oil stained at the southern end of the containment area, and there were oil stains along the lower 6-12 inches of the wall. A soil boring was done in the southeast corner of the containment area before the concrete floor was installed. A soil sample taken from 2-4 feet showed trace levels of PCBs and very high concentrations of petroleum hydrocarbons (PHCs). Two lower soil samples at 4-6 and 6-8 feet showed non-detectable PCB concentrations and trace PHC levels.

## 3. Target Populations or Environments

Groundwater generally flows east to west under the facility. Confinement and perching of infiltration is known to exist at the site. Groundwater is not expected to be used for drinking since there is a water supply system in Tonawanda.

## 4. Recommendations

Since only surface (0-4' deep) contamination existed within the containment area and the containment area was sealed over with concrete, very small amounts of PHCs are expected to be released from this surface contamination. Soil sampling during a SI is recommended at the discharge point of the dike drains.

## H. Fuel Oil Tanks

### 1. Unit Conditions

Two Fuel Oil Tanks are located below the parking lot near the southeast corner of the facility. They were installed in September of 1977 and are currently temporarily out of service. Both tanks are 15,000 gallon, bare steel tanks. There is no leak detection or secondary containment, but there is a product gauge.

They are reportedly empty and have not been used since 1978 when the heating system was converted to natural gas. They are registered with NYSDEC's petroleum bulk storage program.

The potential pollutant dispersal pathways of concern are soil and groundwater. Air, surface water, and subsurface gas releases are unlikely from this unit.

2. Release Description

No known releases have occurred from this unit.

3. Target Populations or Environments

Groundwater generally flows east to west under the facility. Confinement and perching of infiltration is known to exist at the site. Groundwater is not expected to be used for drinking, since there is a water supply system in Tonawanda.

4. Recommendations

These tanks are regulated under the NYSDEC petroleum bulk storage program. When tanks are taken temporarily out of service, (1) all product must be removed and (2) all manways must be locked and fill lines must be plugged. Because the tanks are unprotected, bare steel tanks, they must be tightness tested when the tank is ten years old. No further action is recommended for RCRA corrective action requirements since this unit is regulated under another program.

I. PCB Work Area

1. Unit Conditions

The PCB Work Area has operated since 1978 and is used for storage during receiving of PCB items at the facility, in-process storage of PCB items during repair operations, storage of PCB items used for repair operations (hoses, tanks, etc.), and storage of PCB items prior to off-site disposal. The existing diked area measures 37'3" x 13'10" on the 6 inch thick concrete floor. Secondary containment is provided by a 8"H x 9"W concrete curb which can hold 2580 gallons. Because of lack of space to perform transformer repairs, the PCB Work Area will be expanded with approval having been given by NYSDEC. The expanded area will be 51 feet long and 22.5, 18.5 and 17 feet wide. The expanded area will have the same size curbing and the total secondary containment will hold 13,077 gallons. A floor trench and sink existed in this area until 1983. They emptied into the rinse water tank.

This area is inspected weekly for signs of leaks or deterioration. This unit stores DEC Hazardous Waste Numbers B001-B007.

Three 275 gallon, portable tanks are stored in the PCB work area when on-site. The tanks were constructed in 1979. The tanks temporarily store PCB oil (B001) while repairs are being performed. The tanks are of welded low carbon steel construction with an oval configuration 44" x 27" x 60" L with a 14 gauge wall thickness.

The tanks are inspected weekly for signs of leaks or deterioration. The top filling opening is plugged when the tank is not being used.

The potential pollutant dispersal pathway of concern is soils. Air, surface water, groundwater and subsurface gas releases are unlikely from this unit.

## 2. Release Description

There are surface soils contaminated with PCBs outside the east doorway. This doorway is adjacent to the PCB work area. Two surface soil samples show PCB contamination and very high PHC contamination.

## 3. Target Populations or Environments

General Electric employees or visitors could come into contact with the soil near this unit.

## 4. Recommendations

Since surface contamination with PCBs and PHCs is confirmed adjacent to this unit, corrective measures are recommended. The corrective measures should include removing all contaminated soil, properly disposing of the soil, and sampling to ensure that the soil left behind is clean.

## J. Oil/Water Separators

### 1. Unit Conditions

There are two oil/water separators at this facility. They are both below grade next to the facility's outer wall. The one at location J1 is older and has concrete covers, while the one at location J2 is newer and has manhole covers. These units separate oil from the wastewater stream coming from floor drains and steam booths. Since water is discharged from this unit to the sanitary sewers, a SPDES permit is not required for this unit. The depth of the oil layer is checked with a stick. The separated oil is held in the unit and emptied by a scavenger.

The potential pollutant dispersal pathways of concern are soils and groundwater. This unit discharges to a POTW. Air, surface water, and subsurface gas releases are unlikely from this unit.

## 2. Release Description

The old oil/water separator (location J1) effluent was sampled and found to have 89 ppm PHC and less than 5 ppb PCB. New York State water quality regulations specify 0.1 ppb for PCBs and 15 ppm for oil and grease (PHCs) in groundwater. Four surface soil samples taken around this unit show trace levels of PCBs and PHCs. One sample is high in PHCs, however. A soil boring north of this unit shows trace PCB levels down to 6 feet and PHC contamination in the first 2 feet of soil with trace levels deeper.

The new oil/water separator (location J2) had two borings completed next to it and a soil water sample from the east boring hole was taken. The water sample exceeded New York State water quality regulations for both PCBs and oil and grease in groundwater. Trace levels of PCBs were found in the east hole soil samples but were not detected in the west hole. PHC contamination was found in both borings with very high concentrations in the first 6 feet of the west boring.

## 3. Target Populations or Environments

Groundwater generally flows east to west under the facility. Confinement and perching of infiltration is known to exist at the site. Groundwater is not expected to be used for drinking, since there is a water supply system in Tonawanda.

## 4. Recommendations

These units should be further investigated to determine how they are releasing, or where the releases have come from. It is recommended that a RFI be conducted at this unit.

## K. Floor Drains and Sewers

### 1. Unit Conditions

Two separate storm water and sanitary sewers service this facility. The original sewers were installed when the building was constructed in 1969. In 1978 part of the original sewers were abandoned and additional sewers were installed. The storm sewer discharges to Two Mile Creek. There are three storm water inlets from the outside ground surface: one west, one south, and one southwest of the building.

The following units/processes discharge to the sanitary sewer: rest rooms and two oil/water separators. The sanitary sewer is

tested for PCBs quarterly in accordance with a POTW pretreatment program.

2. Release Description

A sample was taken in the truck bay floor drain and found to have 160 ppm PCBs. This drain discharges through an oil/water separator to the sanitary sewer. A sample was taken in the truck bay trench and found to have 51 ppm PCBs. This trench discharges to the storm sewer. The sanitary sewer leaving the site consistently is found to have approximately 1 ppb PCBs.

3. Target Populations or Environments

Surface water flows through the storm water sewers into Two Mile Creek, a class B stream, which is about half a mile west of the facility. Two Mile Creek flows into the Niagara River, a class A special stream, which is about a mile and a half northwest of the facility. Two Mile Creek is not used for drinking water, but the Niagara River is.

Groundwater generally flows east to west under the facility. Confinement and perching of infiltration is known to exist at the site. Groundwater is not expected to be used for drinking since there is a water supply system in Tonawanda.

4. Recommendations

The floor drains and trenches should be cleaned out. Accumulated sediments should be removed and properly disposed of. These corrective measures will ensure that releases of PCBs to the sewers will be less likely to occur.

L. Rail Spur

1. Unit Conditions

The rail spur is a 140 foot by 60 foot area at the northeast corner of the building. It has been used since 1969 and has two railroad tracks. The area between the tracks and the part of the road next to the tracks is paved. There are two bays in the building where electrical equipment is loaded and unloaded on flatbeds. Flatbeds are stored on the rail spur until pickup. Drums of non-hazardous abrasive blast material are also stored in this area. The ground surface is covered with this black material.

The potential pollutant dispersal pathways of concern are soils and groundwater. Air, surface water, and subsurface gas releases are unlikely from this unit.

2. Release Description

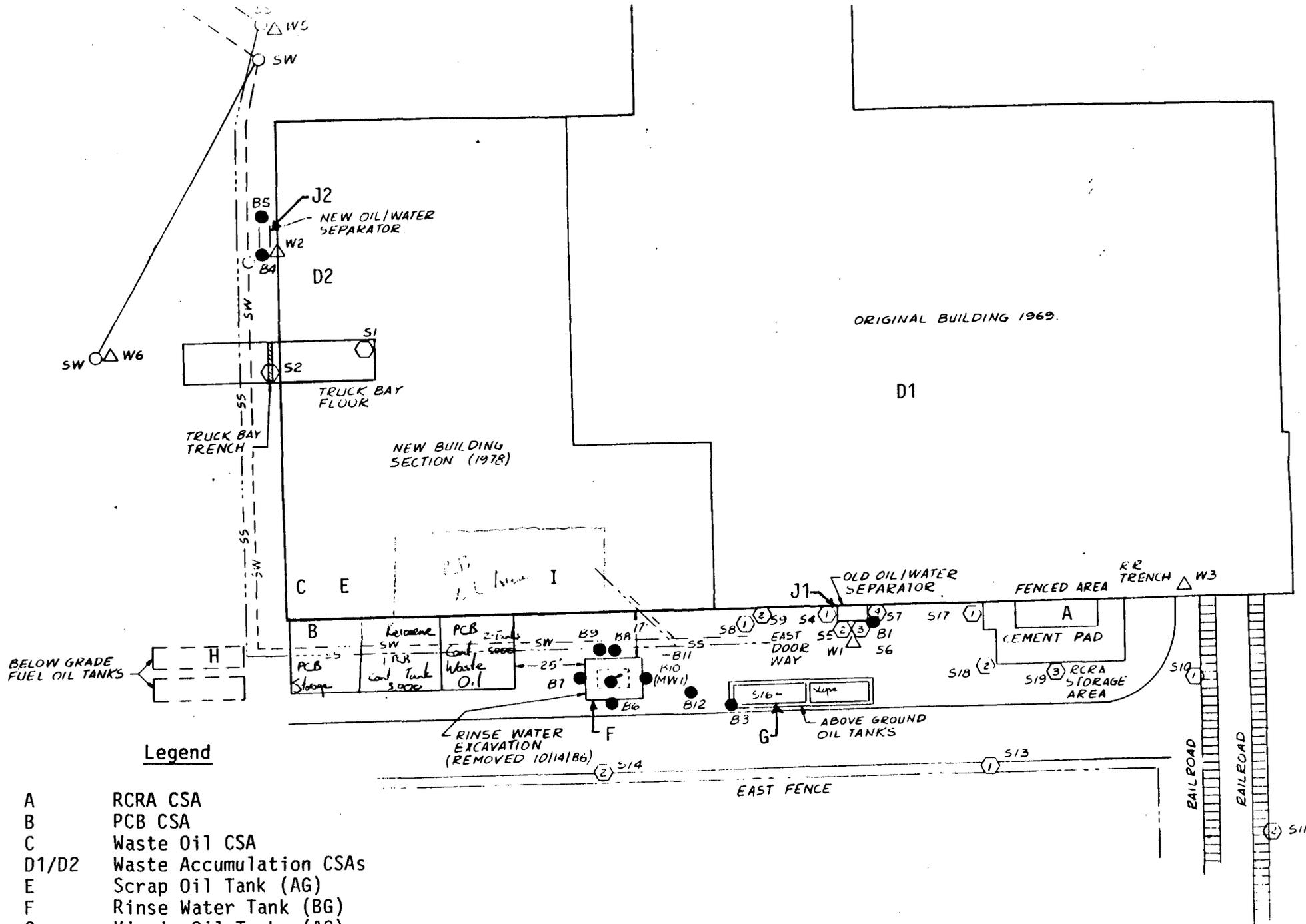
Three surface soil samples next to the tracks show elevated PCB and PHC levels.

3. Target Populations or Environments

Groundwater generally flows east to west under the facility. Confinement and perching of infiltration is known to exist at the site. Groundwater is not expected to be used for drinking since there is a water supply system in Tonawanda.

4. Recommendations

Soil sampling during a SI is recommended at this unit.



**Legend**

- A RCRA CSA
- B PCB CSA
- C Waste Oil CSA
- D1/D2 Waste Accumulation CSAs
- E Scrap Oil Tank (AG)
- F Rinse Water Tank (BG)
- G Virgin Oil Tanks (AG)
- H Fuel Oil Tanks (BG)
- I PCB Work Area
- J1/J2 Oil/Water Separators

GE Buffalo Service Shop  
EPA I.D. No. NYD067539940  
Visual Site Inspection Report  
(RCRA Facility Assessment - RFA)  
July 8, 1987

A Visual Site Inspection (VSI) was conducted at GE Buffalo Service Shop on July 8, 1987 by Douglas Nevel and Raymond Fisher. Mr. Anthony Hejmanoski and Mr. Dick Conway of GE accompanied us when we inspected the facility. Twelve (12) Solid Waste Management Units were inspected.

1. RCRA CSA

The roofing and siding of this unit appeared in good condition. The floor of this unit had a couple of small cracks. There were gaps between the floor and wall that had been filled with caulking. A small gap also existed between two adjacent concrete pads within this area. There were two small holes in the outside of the facility wall in this area. Twenty-seven (27) drums labeled as flammable and corrosive wastes were in this area during the VSI. Aisle space appeared adequate during the VSI. The fence gate was closed and locked. There was an emergency spill kit and a fire extinguisher located in this unit. Directly south of this unit was a pile of empty drums.

2. PCB CSA

There were seventy-six (76) drums labeled as PCB waste within this unit. Drums were not stacked on top of each other and proper aisle space was maintained. There is a sump just north of this unit, next to the curbing. The overhead door was closed and locked.

3. Waste Oil CSA

Approximately 15 drums were stored inside the curbing and 10 drums were stored outside, next to the curbing. This area appeared in good condition.

4. Waste Accumulation CSA

Location D1: There were 3 steel drums used for waste liquids and 3 plastic garbage cans in this area. The plastic garbage cans were used for empty product containers. One product container had spilled liquid into the plastic garbage can. Empty aerosol paint spray cans are depressurized and drained in this area before being disposed of.

Location D2: There were 3 steel drums in this area. One drum stored waste asbestos insulation from old transformers and motors.

5. Scrap Oil Tank

The top opening on this tank was covered and locked during the VSI. The tank appeared in good condition.

6. Rinse Water Tank

An orange net was visible which marked the limit of the excavation during tank removal. The excavation had been backfilled on top of this net. Weeds had overgrown this area and a monitoring well was visible in this area.

7. Virgin Oil Tank

The secondary containment area was free of liquids. The floor in this area was free of cracks, but the walls had been repaired in spots. The tanks had rust spots where the paint had peeled. Two pipes stuck out of the ground in the vicinity of these tanks. These pipes are assumed to be sewer clean outs. The two fill ports are within the secondary containment area. Two drainage pipes stuck out of the east side of the containment wall. One pipe had a locking valve while the other did not.

8. Fuel Oil Tanks

Two manhole covers and two fill port covers were visible in the parking lot above this unit. Two vents from these tanks went up the south side of the building.

9. PCB Work Area

All drums and crates stored in this area had PCB waste labels. Some of the hazardous waste material stored outside the curbed area had drip pans for secondary containment. No evidence of any drips or leaks was evident in the drip pans or on the concrete floor in this area. The 275 gallon PCB waste oil tanks had PCB waste labels on them and were inside the curbed area. Several overpack drums that held drums containing waste capacitors were stored outside the curbed area. The overpack drums provided secondary containment. Drained capacitors that were wrapped in plastic and put in crates were stored outside the curbed area. Several drums in the curbed area held hoses used in PCB operations. Several additional 275 gallon, portable tanks were in this area and were used for non-hazardous waste oils. This area was very congested and held a large volume of waste.

10. Oil/Water Separators

Location J1: The two concrete covers on this unit were removed during the VSI. One compartment held water and the other held separated

oil. The liquid level in both compartments was the same. Mr. Hejmanoski said the oil compartment was emptied at least once a year.

Location J2: Two manhole covers were visible in the parking lot above this unit. This unit was not uncovered during the VSI.

#### 11. Floor Drains and Sewers

The floor drain in the northeast corner of the building was inspected during the VSI. A 1.5'W x 60'L covered floor drain extended from the northeast corner along the east facility wall. The floor drain discharges into a sump at its southern end. A submersible pump empties this sump with a 1.5 inch PVC pipe through the facility wall. This PVC pipe discharges on the ground surface outside. Floor drains were observed at two steam cleaning booths in the facility. The sunken truck bay has a trench at its southern end and a drain at its northern end. In the environmental study performed at GE, a pipe was found extending from the east end of the north wall of the building. This pipe was inspected during the VSI and found to be a discharge pipe from the sprinkler system.

Three storm water inlets were observed during the VSI: one west of the building, one in the parking lot near the southwest corner of the building, and one in the middle of the parking lot south of the building.

#### 12. Rail Spur

Two flatbeds with electrical equipment were in this area during the VSI. A half a dozen drums of abrasive blast material were stored between the tracks. The soil was covered with this black blast material.

## Sample Locations/Rationale

Sampling at the GE Buffalo Service Shop will be conducted at the RCRA Container Storage Area (CSA), PCB CSA, Virgin Oil Tanks, and Rail Spur. The sampling chart summarizes the sample locations, collection procedures, number of samples, parameters, and analytical methods. Any changes in the sampling plan during the sampling visit must be approved or directed by the appropriate regulatory agency personnel at the site. Laboratory analysis must be done at NYSDEC approved labs. The following discussion describes the sampling procedures to be followed at each SWMU listed in the sampling chart.

### RCRA CSA

One boring will be taken on the south side of the concrete pad. This boring will be eight feet deep and a composite sample will be taken every two feet starting at a two foot depth. A total of three samples will be taken.

### PCB CSA

One surface soil sample will be taken near the southeast corner of this unit. This sample will be analyzed for polychlorinated byphenols (PCBs).

### Virgin Oil Tanks

A boring will be taken one (1) foot east of the containment area discharge pipes. This boring will be eight feet deep with a composite sample taken every two feet. These samples will be analyzed for petroleum hydrocarbons (PHCs).

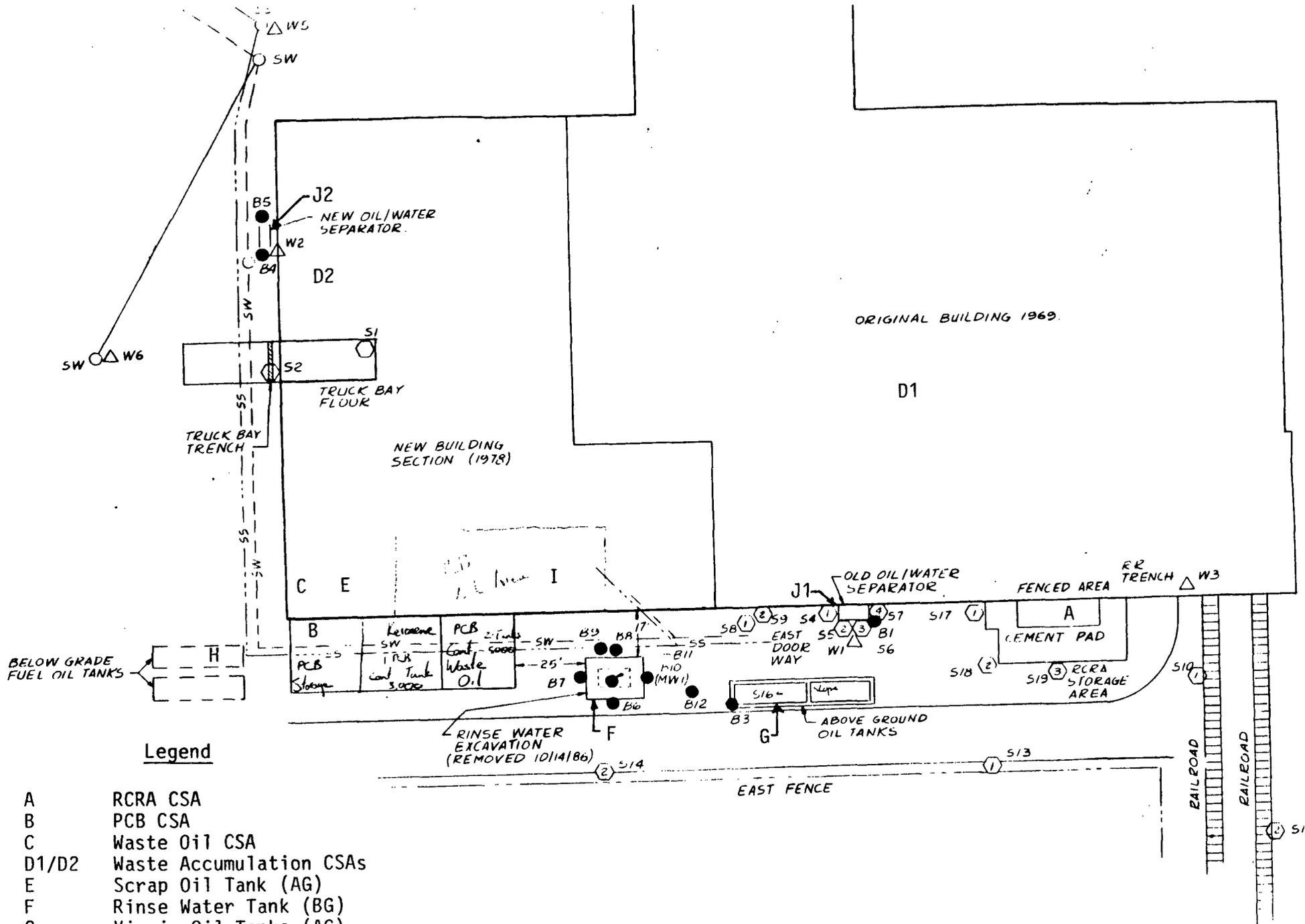
### Rail Spur

Six surface samples will be taken as shown on the attached diagram. These samples will be analyzed for PCBs.

Sampling Chart - GE Buffalo Service Shop

Unit	Sample Location	Collection Procedure	Sample Matrix/Type	Number of Samples	Parameters	Analytical Method from SW-846
RCRA CSA	South Side of concrete pad	hollow stem auger	core/soil	3	halogenated volatile organics	8010
					nonhalogenated volatile organics	8015
					aromatic volatile organics	8020
PCB CSA	Southeast corner	stainless steel scoop	surface/soil	1	Organochlorine Pesticides & PCBs	8080
Virgin Oil Tanks	next to dike drain	hollow stem auger	core/soil	4	*	*
Rail Spur	See diagram	Stainless steel scoop	Surface/soil	6	Organochlorine Pesticides & PCBs	8080

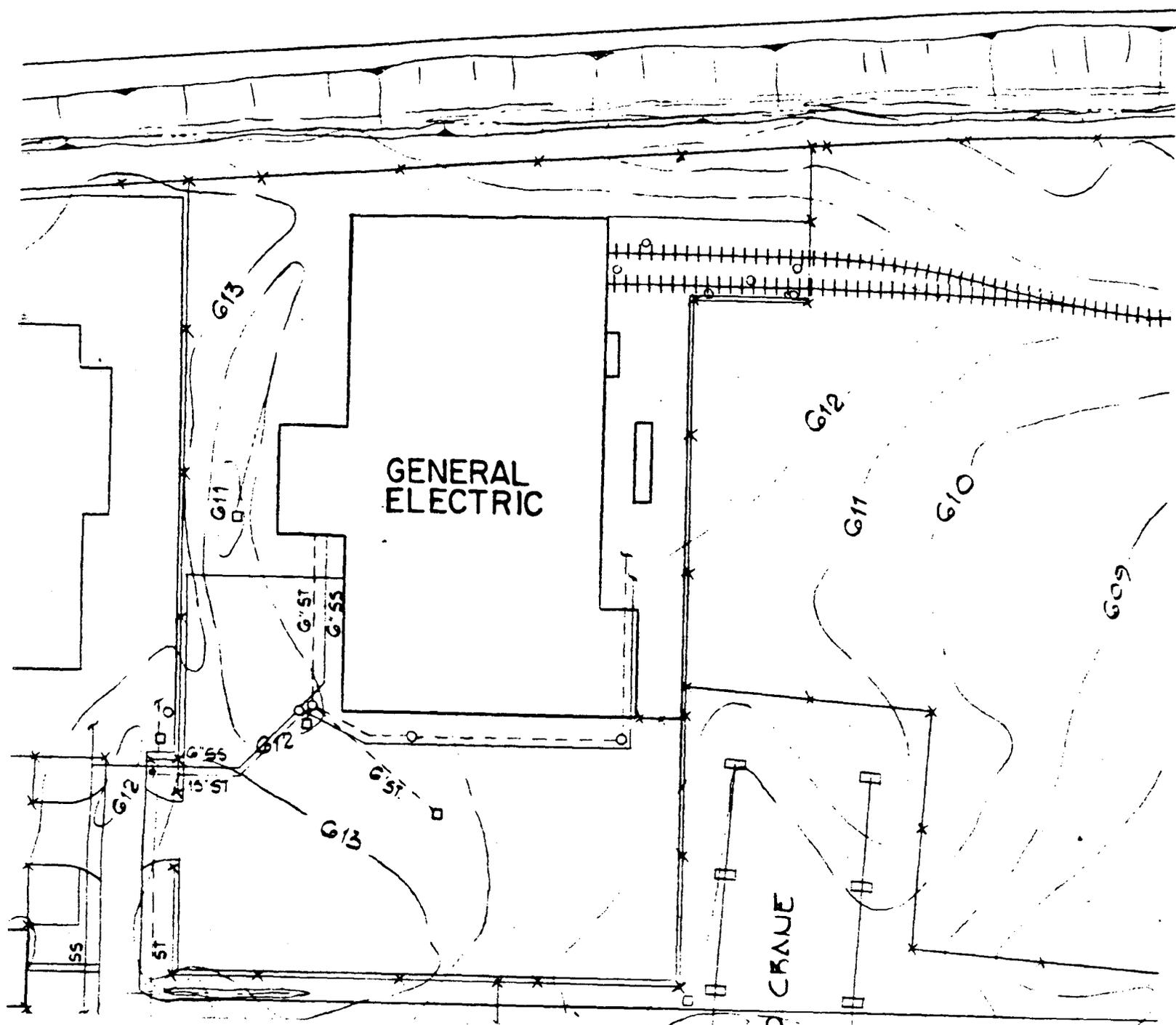
\* To be determined



**Legend**

- A RCRA CSA
- B PCB CSA
- C Waste Oil CSA
- D1/D2 Waste Accumulation CSAs
- E Scrap Oil Tank (AG)
- F Rinse Water Tank (BG)
- G Virgin Oil Tanks (AG)
- H Fuel Oil Tanks (BG)
- I PCB Work Area
- J1/J2 Oil/Water Separators

# YOUNGMANU HWY.



## Legend

◦ Sampling Location