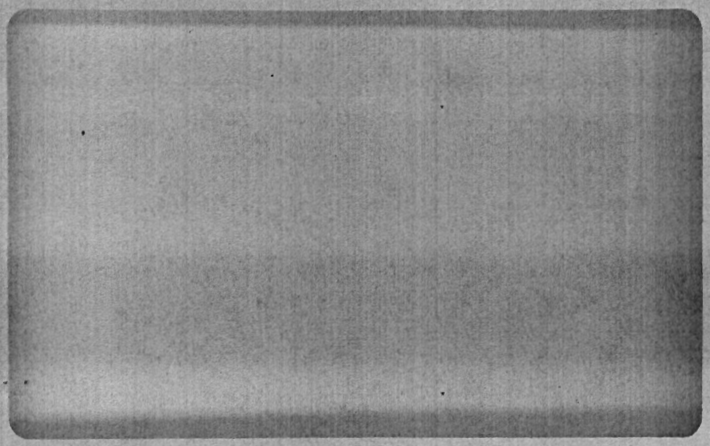
22nd Fl.



T E S III

# TECHNICAL ENFORCEMENT SUPPORT AT HAZARDOUS WASTE SITES

## U.S. EPA CONTRACT NO. 68-01-7331

**CDM** Federal Programs Corporation

# **CDM** Federal Programs Corporation

November 23, 1988

Rose Harvell
Project Officer
U.S. Environmental Protection Agency
401 M Street, Room 2834
Washington, D.C. 20460

PROJECT: EPA CONTRACT NO.: 68-01-7331

DOCUMENT NO.: T934-R02-EP-CTAM-1

SUBJECT: Final Report for EPA Work Assignment R02002/934
CAPT LOIS Inspection
Pratt and Lambert
Buffalo, New York
Document Control No.: T934-R02-FR-CRCM-2

Dear Ms. Harvell:

Please find enclosed the Final Report entitled, "CAPT LOIS Inspection, Pratt and Lambert, Buffalo, New York", as partial fulfillment of the reporting requirements for this work assignment.

If you have any comments regarding this submittal, please contact Eddy Lin of PRC Environmental Management, Inc. at (312)856-8700 within two weeks from the date of this letter.

Sincerely,

CDM Federal Programs Corporation

Robert D. Goltz, P.E.
TES III Regional Manager



RDG/mea

Enclosure

cc: Margaret Emile, EPA Primary Contact, RCRA Region II
Derval Thomas, EPA Regional Contact, RCRA Region II
Lisa McDaniel, EPA HQ Coordinator, RCRA Region II
Harry Butler, CDM Federal Programs Corporation, Deputy Program Manager (letter and cover only)
Barbara Kuberski, EPA Contracting Officer (letter only)
Daniel Chow, PRC Environmental Management, Inc. (letter only)
Document Control, CDM Federal Programs Corporation (2 copies)

(WP2/38)

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# FINAL REPORT
# CAPT LOIS INSPECTION
# PRATT AND LAMBERT
# BUFFALO, NEW YORK

**Prepared for**

**U.S. ENVIRONMENTAL PROTECTION AGENCY**
**Office of Waste Programs Enforcement**
**Washington, D.C. 20460**

| | |
|---|---|
| EPA Work Assignment No. | : R02002/934 |
| EPA Region | : II |
| Site No. | : NJD 002113322 |
| Contract No. | : 68-01-7331 |
| CDM Federal Programs Corporation Document No. | : T934-R02-FR-CRCM-2 |
| Prepared By | : PRC Environmental Management, Inc. |
| Work Assignment Project Manager | : Eddy Lin |
| Telephone Number | : (312)856-8700 |
| Primary Contact | : Margaret Emile |
| Telephone Number | : (212)264-5175 |
| Date Prepared | : November 23, 1988 |

(WP2/38)

(Master/6)

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LIST OF FIGURES

## 1.0 INTRODUCTION

CDM Federal Programs Corporation (CDM FPC) received Work Assignment No. 934 from U.S. EPA, under Contract No. 68-01-7331 (TES III), to conduct up to 50 corrective action prior to loss of interim status (CAPT LOIS) inspections in the State of New York. CDM FPC has directed its TES III team member, PRC Environmental Management, Inc. (PRC), to provide the necessary assistance under this work assignment.

A CAPT LOIS inspection is organized similar to a RCRA facility assessment (RFA). A CAPT LOIS inspection consists of (1) a file review, similar to a preliminary review, and (2) a site visit, similar to a visual site inspection. For this reason, a CAPT LOIS inspection is sometimes referred to as a "limited RFA."

PRC conducted a CAPT LOIS inspection of the Pratt & Lambert (P & L) facility in Buffalo, New York. As the first phase of the inspection, PRC conducted a file review at the U.S. EPA Region 2 and New York State Department of Environmental Conservation (NYSDEC) offices. Based on the information obtained during the file review PRC prepared and submitted a preliminary report to U.S. EPA on August 10, 1988. As the second phase of the CAPT LOIS inspection, PRC conducted a site visit at the P & L facility on September 6, 1988. PRC conducted the site visit to verify the information in the preliminary report, identify additional solid waste management units (SWMU) and other areas of concern, and observe evidence of releases from the SWMUs or other areas of concern. Based on the results of the site visit, PRC prepared and submitted a draft report dated October 5, 1988, to U.S. EPA to reflect the actual conditions at the Pratt Lambert facility. This final report describes the facility; discusses the findings of the file review and site visit; and responds to comments received from U.S. EPA, NYSDEC, and CDM FPC.

Pertinent information on the facility is presented below:

| | |
|---|---|
| Facility Name: | Pratt & Lambert |
| U.S. EPA I.D. No.: | NYD 002113322 |
| Facility Address: | 75 Tonawanda Street<br>Buffalo, New York 14207 |
| Mailing Address: | P.O. Box 22<br>Buffalo, New York 14240 |
| Facility Contact: | E. G. LeVea |
| Telephone: | 716/873-6000 |

## 2.0 FACILITY DESCRIPTION

The P & L facility is located at 75 Tonawanda Street, Buffalo, Erie County, New York. The facility has been in operation since January 1901. P & L manufactures paints and resins in three production plants at the facility -- the trade sale product plant, the resin plant, and the industrial plant. Manufacturing operations that generate wastes primarily include cleaning of equipment and disposal of waste paints and resins. P & L generates five waste streams: (1) paint and paint sludge from the decanting of wash solvents waste (D001), (2) spent caustic cleaning sludge from equipment cleaning in the resin plant (D002), (3) water containing solvent from equipment cleaning (D001), (4) wash solvent waste (D001) from equipment cleaning, and (5) caustic wash water from equipment cleaning. Wastes from the first three waste streams are drummed and accumulated in satellite accumulation areas throughout the facility. When the drums are full, they are taken to one of three areas for storage for less than 90 days before they are shipped to Ross Incineration Services in Grafton, Ohio for incineration. Caustic wash water (K079) was delisted in 1981 and is discharged to the Buffalo Sewer Authority (BSA). The wash solvent waste is stored in tanks and then burned in two boilers (P & L, 1986a).

In 1980, P & L submitted a RCRA Part A permit application for (1) storage in containers (nine areas) and tanks and (2) treatment (P & L, 1980). In 1986, P & L

submitted a closure plan for three container storage areas (P & L, 1986a). NYSDEC approved the plan in 1987, and after conducting closure activities, P & L certified closure of the three areas (NYSDEC, 1987a and c; P & L, 1987). In addition, P & L has a BSA permit (No. 85-08-0164B) to discharge its caustic cleaning wash water to the BSA's sewer.

## 3.0 SOLID WASTE MANAGEMENT UNITS

PRC identified 6 solid waste management units (SWMU) at the P & L facility. The units are listed below.

- Container storage area A
- Container storage area B
- Container storage area C
- Storage tanks
- Satellite container accumulation areas
- Boilers

Figures 1 and 2 show the layout of the trade sale plant, resins plant and industrial plant at the facility, including the location of all the SWMUs.

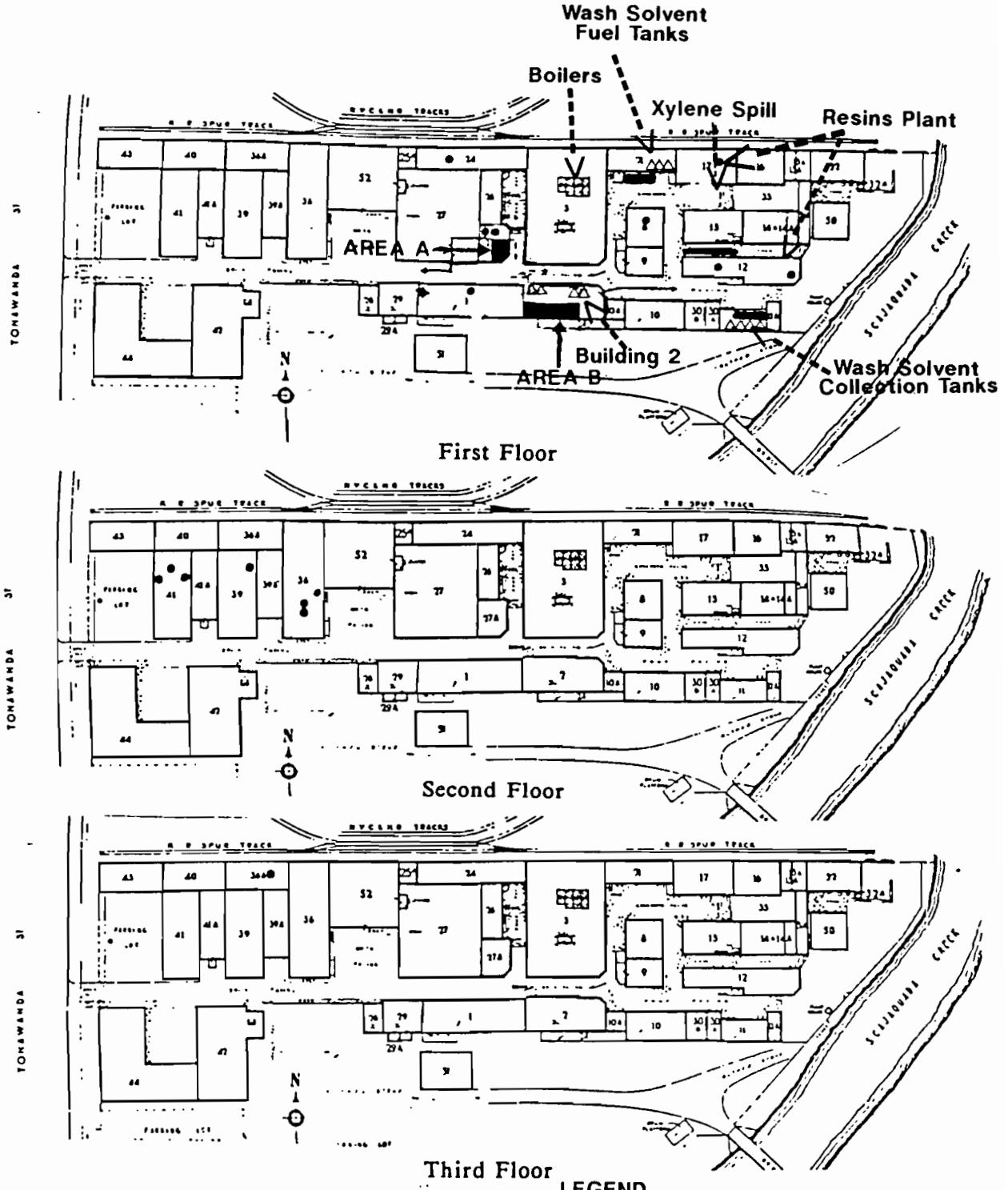
During the site visit, PRC personnel used an HNu photoionization detector to detect the presence of volatile vapors at the P & L facility. A 5 ppm reading above background was observed in the storage tanks area. In addition, PRC took photographs of each SWMU. Copies of the photographs are included the appendix.

The following sections describe each SWMU, discuss the status of the units, identify the types of waste handled by the units, describe P & L's waste management procedures for the units, describe known and suspected releases, and discuss remedial actions (if any) taken in response to releases.

FIGURE 1

P & L FACILITY LAYOUT

TRADE SALE AND RESINS PLANTS




Scale: 1 inch = 200 feet

Source: P & L, 1980 and 1986.

LEGEND

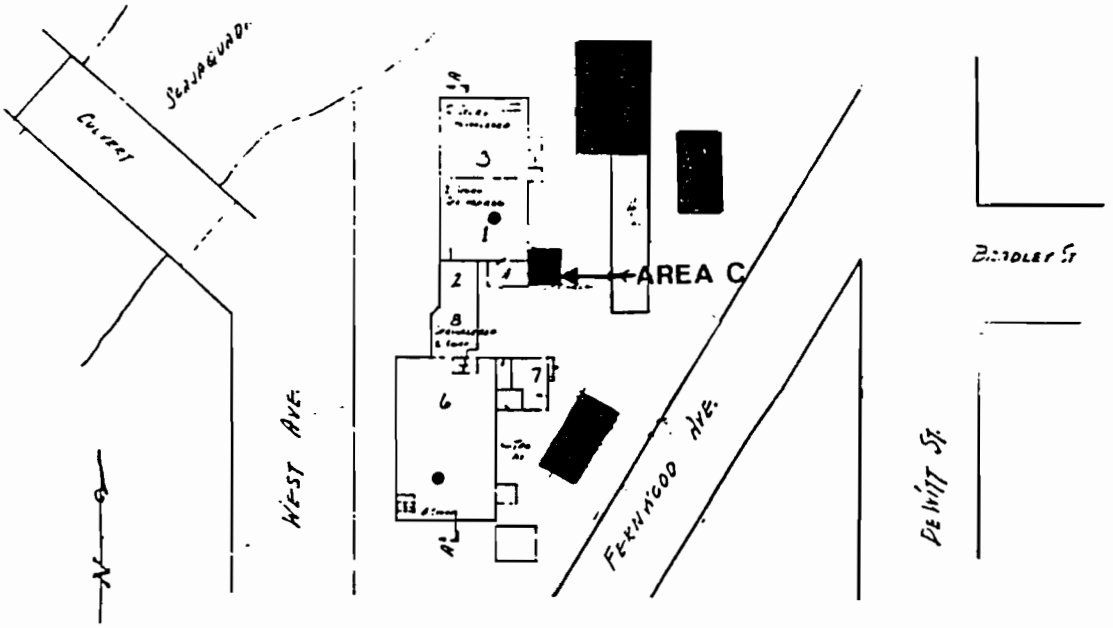
●Satellite Accumulation Area

■Container Storage Area

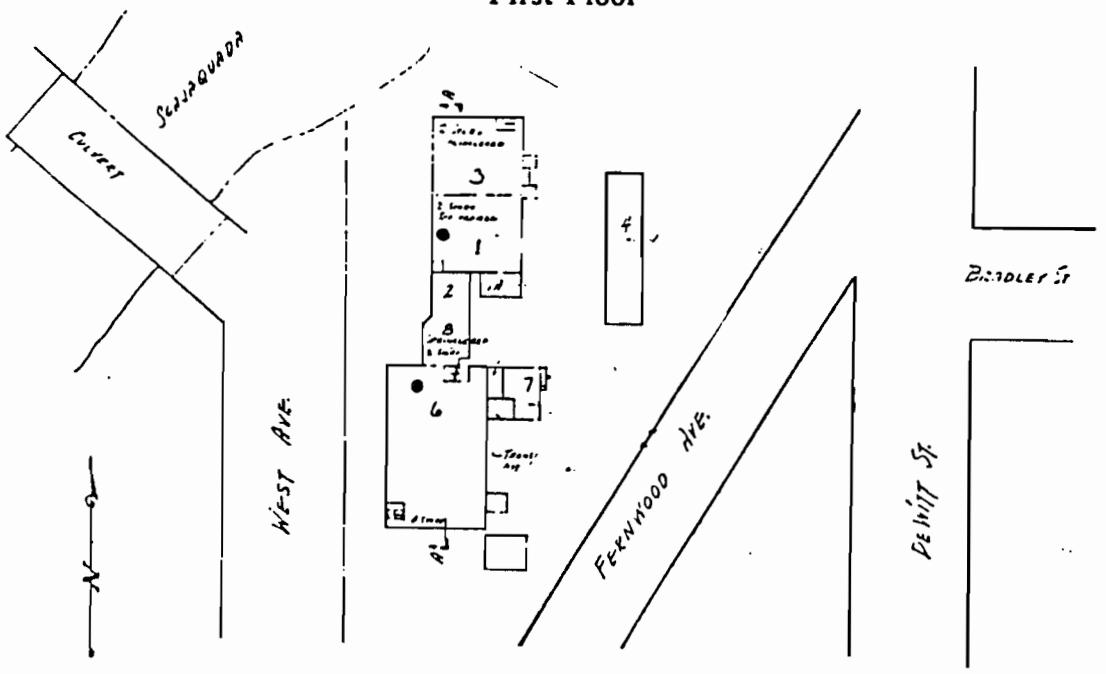
△Collection Tanks

## FIGURE 2

## P & L FACILITY LAYOUT -- INDUSTRIAL PLANT




First Floor




Second Floor

Scale: 1 inch = 70 feet
Source: P & L, 1980 and 1986b.

LEGEND
● Satellite Accumulation Area
■ Container Storage Area

## 3.1 CONTAINER STORAGE AREA A

Description:

P & L stores containers of hazardous waste in this area, located on the first floor of Building 27 of the main plant. The area covers 450 square feet (P & L, 1980). The storage area has a concrete floor and has no floor drains or curb. P & L also stores raw materials in an adjacent open area (Photo No. 1).

Status:

Active. This area has been used to store hazardous waste since 1977. This area was certified closed on December 18, 1987 (P & L, 1987). NYSDEC accepted the closure certification on January 4, 1988. Currently, the area is used to accumulate containers of hazardous waste for less than 90 days.

Waste Type:

P & L accumulates paint wastes and paint sludges (15 percent of alkyd resins, 14 percent of mineral spirits, 30 percent of calcium carbonate, 30 percent of titanium dioxide, D001 ), and water/solvent mixtures (75 percent of water, 16 percent of mineral spirits, 2 percent of xylene, D001), in this area (P & L, 1987).

Waste Management:

Hazardous wastes are accumulated in 55-gallon steel drums for less than 90 days before being shipped off-site. These drums are stored on the concrete floor and stacked two high. During closure, the drums of waste in storage were removed; the area was washed and scrubbed with detergent and water (P & L, 1986a and 1987). Wipe tests were taken at four locations. P & L tested these wipe samples for lead and hexavalent chromium (P & L, 1986a). The results for the four samples showed that neither lead nor hexavalent chromium was present at levels "below quantifiable limits" (BQL) (P & L, 1987).

Known and Suspected Releases:

P & L reported that no known releases had occurred in the area (P & L, 1986a). During the site visit, no sign of spills was observed in this area.

## 3.2 CONTAINER STORAGE AREA B

Description:

P & L stores containers of hazardous waste in this area, located inside on the first floor of Building 2 of the main plant. Container storage area B, shares the same room as an indoor tank farm and covers 480 square feet. The entire room is about 3 feet below the grade level. The area has a concrete floor and has no floor drain or curb (Photo No. 2).

Status:

Active. The area has been used for storage since 1977. The area was certified closed on December 18, 1987 (P & L, 1987). NYSDEC accepted the closure certification on January 4, 1988. Currently, the area is used to accumulate containers of hazardous waste for less than 90 days. However, no hazardous waste was accumulated in this area during the site visit.

Waste Type:

Wastes accumulated in this area are the waste paint and paint sludges (D001), spent caustic cleaning sludge (40 percent of alkyd resins, 44 percent of water, 7 percent of urethane resins, 6 percent of acrylic resins, and 3 percent of NaOH, D002), and water solvent-mixture (D001).

Waste Management:

Hazardous wastes are accumulated in 55-gallon drums for less than 90 days before being shipped off-site. During closure, the drums of waste in storage were removed; the area was then washed and scrubbed with detergent and water (P & L, 1986a and 1987). Wipe tests were taken at

five areas. P & L tested these wipe samples for lead and hexavalent chromium. The results for the five samples showed that hexavalent chromium was present at levels "BQL" (P & L, 1987). The results for the five samples also showed that lead was present at the following levels: 0.017, 0.012, 0.0085, 0.0075, and 0.0085 milligrams (mg) per square meter of sample area (P & L, 1987).

Known and Suspected Releases:

P & L reported that no known releases had occurred in the area (P & L, 1986a). Furthermore, P & L determined that the trace amounts of lead in the wipe samples are order of magnitude lower than the EP toxicity lead level. Consequently, P & L determined that the area was free of significant contamination for lead and hexavalent chromium (P & L, 1987). During the site visit, no sign of spills was observed in this area.

## 3.3 CONTAINER STORAGE AREA C

Description:

P & L accumulates containers of hazardous waste in this area, located outside of building 1A of the industrial plant. The area covers 484 square feet. The area has a concrete pad and has no floor drain or curb (Photo No.3).

Status:

Active. The area was certified closed on December 18, 1987 (P & L, 1987). NYSDEC accepted the closure certification on January 4, 1988. Currently, the area is used to accumulate containers of hazardous waste for less than 90 days.

Waste Type:

Wastes accumulated in this area are waste paint and paint sludge (D001) and water containing solvent (D001).

Waste Management:

Hazardous wastes are accumulated in 55-gallon steel drums. These steel drums are stored on the concrete floor. During closure, the drums of waste in storage were removed; the area was then washed and scrubbed with detergent and water (P & L, 1986a and 1987). Wipe tests were taken at four areas. P & L tested these wipe samples for lead and hexavalent chromium. The results for the four samples showed that hexavalent chromium was present at levels "BQL" (P & L, 1987). The results for the four samples also showed that lead was present at the following levels: 0.4, 0.36, 0.25, and 0.24 mg per square meter of sample area (P & L, 1987).

Known and Suspected Releases:

P & L reported that no known releases had occurred in the area (P & L, 1986a). Furthermore, P & L determined that the trace amounts of lead in the wipe samples are order of magnitude lower than the EP toxicity lead level. Consequently, P & L determined that the area was free of significant contamination for lead and hexavalent chromium (P & L, 1987). During the site visit, no sign of a spill was observed in this area.

## 3.4 STORAGE TANKS

Description:

P & L operates 12 tanks to store liquid wastes generated from the manufacturing process. The location of these tanks, number of tanks and their size are listed below.

- Building 2
  - Two caustic wash water collection tanks -- 4,000 gallons each (photo No. 4).
  - One scrubber water tank -- 4,000 gallons (Photo No. 5).
  - One blending tank -- 4,000 gallons (Photo No. 6).

- o Building 11
  - Five wash solvent collection tanks -- 2,500 gallons each (Photo No. 7).
- o Building 21
  - Three wash solvent fuel tanks -- 2,500 gallons each

All the tanks are located indoors.

Status:

Active.

Waste Type:

Caustic wash water, scrubber water (acidic), and wash solvent are stored in these 12 tanks.

Waste Management:

P & L generates wash solvent in drums from the production area, then the wash solvent is pumped to the wash solvent tanks. After settling, the wash solvent is pumped to wash solvent fuel tanks. Then the wash solvent is burned in 2 gas-fired boilers. The caustic wash water is pumped from the caustic wash water tanks to the scrubber tank first, mixed with the acidic scrubber water to neutralize. Then the mixture is pumped to the blending tank for thorough mixing. After mixing and neutralization, the mixture is discharged to sewer.

Known and Suspected Releases:

At the time of the site visit, PRC observed the sign of spillage on the floor in the building 2 (Photo No. 8). However, the tanks have been in the building for long time, the spillage could occur long time ago. The HNu also showed readings of 5 ppm above background.

Remedial Action Taken:

The floor in the Building 2 is about 3 feet below the ground level. This effectively serves as a containment capacity for the storage tanks. P & L stated if any spill occurred, absorbent will be used to absorb the spillage.

## 3.5 SATELLITE CONTAINER ACCUMULATION AREAS

Description:

P & L operates 20 satellite accumulation areas throughout the facility (13 in the trade sale plant, 4 in the industrial plant and 3 in the resins plant) to handle hazardous wastes generated from manufacturing operations (P & L, 1986). Each satellite accumulation area is equipped with a 55-gallon steel drum on the concrete floor. There is no curb or floor drain near any of the accumulation areas.

Status:

Active.

Waste Type:

Wastes stored in these areas are paint waste, paint sludge and water/solvent mixture.

Waste Management:

Drums of waste are accumulated in these areas until full, then they are taken to the storage areas A and C.

Known and Suspected Releases:

P & L stated that no spill had occurred in these areas. PRC did not observed sign of release during the site visit.

### 3.6 BOILERS

Description:

P & L operates four gas/oil-fired boilers to generate electricity for its production operations. These four boilers are located i the basement of building 3. However, only two boilers have the capability to burn wash solvent.

Status:

Active. The two boilers that burn wash solvent appear to have been in operation since 1983 (P & L, 1983b).

Waste Type:

Wash solvent (D001) is burned in these two boilers.

Waste Management:

Wash solvent is pumped from the wash solvent fuel tanks to the two boilers (P & L, 1983b). P & L notified EPA that the wash solvent was burned for energy recovery, which is not a regulated treatment process under RCRA (P & L, 1983b). On the average, about 2,750 gallons of wash solvent are burned in these two boilers per year.

Known and Suspected Releases:

No sign of release was observed during the site visit.

## 4.0 OTHER AREAS OF CONCERN

PRC identified four areas of concern at the P & L facility. These areas of concern involved spills that have occurred at the facility. Available information about the spills is presented in the following sections.

## 4.1 FIRST SPILL OF UNKNOWN SUBSTANCE

An unknown quantity of an unknown substance spilled at the south side of West Avenue (the lacquer plant) on August 8, 1986 (NYSDEC, 1986a). According to the NYSDEC Spill Response Form, the spill appeared to be "paint blue color", which overflowed from the sewer to Scajaquada Creek (NYSDEC, 1986a). According to P & L, this was a sewer backup and, therefore, was not considered a spill (P & L, 1988).

## 4.2 XYLENE SPILL

Approximately 200 gallons of xylene spilled at the P & L facility on August 11, 1986 (NYSDEC, 1986b). The spill occurred as a result of a leaking valve. The spill occurred in an asphalt-paved courtyard between buildings 13 and 17 in the trade sale plant. The spill was contained with absorbent, and the resultant spill debris was placed in drums and disposed of off-site as hazardous waste (P & L, 1986b).

## 4.3 SECOND SPILL OF UNKNOWN SUBSTANCE

An unknown quantity of an unknown substance spilled at Niagara Street and Scajaquada Creek on August 28, 1986 (NYSDEC, 1986c). According to the NYSDEC Spill Response Form, the spill appeared to be a white material coming from a discharge pipe directly into Scajaquada Creek (NYSDEC, 1986c). In addition, the form noted that the discharge occurs periodically. According to P & L, this was a sewer backup. Therefore, it was not considered a spill (P & L, 1988).

## 4.4 NO. 2 FUEL OIL SPILL

No. 2 fuel oil spilled at the P & L facility on December 10, 1987 (NYSDEC, 1987b). According to the NYSDEC Spill Response Form, the spill occurred when a 12,000 gallon tank system failed (NYSDEC, 1987b). The tank is located in a tank farm in Building No. 21. The tank farm is about 6 inches below the ground level. After the spill, P & L used an absorbent to contain the spillage. At the time of

the site visit, the No. 2 fuel residue and absorbent were still on the ground (Photo No. 9). The HNu reading in this tank farm was 5 ppm above the background.

## 5.0 SUMMARY AND CONCLUSIONS

During the file review, PRC identified six SWMUs at the P & L facility. These six SWMUs, are (1) container storage area A, (2) container storage area B, (3) container storage area C, (4) storage tanks, (5) satellite container accumulation areas, and (6) boilers. PRC also identified four areas of concern: two unknown substance spill, one xylene spill and one No. 2 fuel spill. According to Mr. John Maclauchlan of P & L, these two spills probably were sewer backups (P & L, 1988). The xylene spill was contained and cleaned up. The No. 2 fuel spill was contained in the tank farm in building No. 21, P & L has not cleaned up the spilled residue and absorbent. During the site visit, PRC also observed signs of spillage in building 2.

## REFERENCES

NYSDEC, 1986a. Spill Response Form, regarding a spill of an unknown substance. August 8, 1986.

NYSDEC, 1986b. Spill Response Form, regarding a xylene spill. August 11, 1986.

NYSDEC, 1986c. Spill Response Form, regarding a spill of an unknown substance. August 28, 1986.

NYSDEC, 1987a. Letter from James Sibbald Moran to Mr. Eugene LeVea, P & L, regarding approval of P & L's closure plan. October 20, 1987.

NYSDEC, 1987b. Spill Response Form, regarding a spill of No. 2 fuel oil. December 10, 1987.

NYSDEC, 1987c. Letter from James Sibbald Moran to Mr. Eugene LeVea, P & L, regarding receipt of closure certification and notification of the need to evaluate the facility under the corrective action provisions of HSWA. December 29, 1987.

P & L, 1980. RCRA Part A permit application. November 14, 1980.

P & L, 1983a. Letter from M. M. Galbraith to Mr. Ernest A. Regna, U. S. EPA, regarding P & L's decision to not file a RCRA Part B permit application. March 4, 1983.

P & L, 1983b. Letter from M. M. Galbraith to Mr. Ernest A. Regna, U. S. EPA, regarding changes to P & L's RCRA Part A permit application. December 14, 1983.

P & L, 1984. Letter from Donald W. Smith to Mr. Gregory T. Halbert, U. S. EPA, regarding Docket No. II RCRA-84-0027.

P & L, 1986a. Letter from Eugene G. Levea to Mr. Robert Kiddle, NYSDEC, regarding submittal of a closure plan for the P & L facility (with a copy of the closure plan attached). November 21, 1986.

P & L, 1986b. Inter-office Correspondence for Xylene Spill on August 11, 1986.

P & L, 1987. Letter from Eugene LeVea to Mr. James Sibbard Moran, NYSDEC, regarding submittal of closure certification (with a copy of the closure certification attached). December 18, 1987.

P & L, 1988. Interview with Mr. John MacLauchlan of P & L on September 6, 1988.

# APPENDIX

## PHOTOGRAPHS TAKEN DURING THE SITE VISIT

Photo No. 1


Date: 09/06/88 Picture Taken By: Eddy Lin Direction Facing: East
Picture Description: Container storage area A

Photo No. 2


Date: 09/06/88 Picture Taken By: Eddy Lin Direction Facing: South
Picture Description: Container storage area B

Photo No. 3

Date: 09/06/88 Picture Taken By: Eddy Lin Direction Facing: West
Picture Description: Container storage area C

Photo No. 4


Date: 09/06/88 Picture Taken By: Eddy Lin Direction Facing: North
Picture Description: Caustic wash water tanks (yellow tanks)

Photo No. 5

Date: 09/06/88 Picture Taken By: Eddy Lin Direction Facing: North
Picture Description: Scrubber water tank (red tank)

Photo No. 6

Date: 09/06/88 Picture Taken By: Eddy Lin Direction Facing: North
Picture Description: Blending tank (yellow)

Photo No. 7


Date: 09/06/88 Picture Taken By: Eddy Lin Direction Facing: South
Picture Description: Wash solvent collection tanks

Photo No. 8


Date: 09/06/88 Picture Taken By: Eddy Lin Direction Facing: North
Picture Description: Evidence of spillage in building 2, storage tank area

Photo No. 9


Date: 09/06/88 Picture Taken By: Eddy Lin Direction Facing: West
Picture Description: No. 2 fuel spill in building 21 tank farm