PCB STORAGE SITE CLOSURE PLAN

FOR

NIAGARA TRANSFORMER CORPORATION

SENECA STREET SITE

March, 1987

Submitted to:

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION REGION 9 OFFICE

NUSSBAUMER & CLARKE, INC. CONSULTING ENGINEERS

## PCB STORAGE SITE CLOSURE PLAN FOR NIAGARA TRANSFORMER CORPORATION

## SENECA STREET SITE

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#### I. FACILITY CONDITION

Niagara Transformer Corporation (NTC) is a local producer of commercial transformers. This closure plan applies to the following NTC facility:

1600 Seneca Street, Buffalo, New York 14210

EPA ID No. NYT370011223

A site plan of the Seneca Street facility appears in Appendix A.

The facility was used to temporarily store PCB insulating fluid and other PCB contaminated materials that resulted from NTC operations. The wastes were collected in 55 gallon drums at the NTC Dale Road location and transported to Seneca Street. The storage site consists of a 990 square foot area of Building No. 6 (refer to Appendix A). The drums were kept within secondary containment steel trays, sized to contain all wastes should a drum rupture or leak. A total of twelve trays had been used during the peak storage period.

No leakage from any waste drum has ever been observed. If corrosion of the drum became evident, the wastes were transferred to another drum. All wastes stored on site had been removed and disposed of by late 1983. No PCB material has been stored at the Seneca Street site since inventory removal. Four of the twelve containment trays remain on site and unused; the remaining eight are used to contain non-PCB insulating fluids at Dale Road.

It has been and will continue to be the policy of NTC to not accept any transformer or other material containing greater than 50 ppm of PCB's.

The goal of this present effort is to attain PCB closure of Seneca Street through site testing to ensure an acceptably low PCB residual concentration at the facility.

#### **II. INVENTORY REMOVAL**

As previously mentioned, all PCB-contaminated material had been removed from the site by late 1983. Copies of the Hazardous Waste Manifests comprise Appendix B. SCA Chemical Services of Model City, New York, was responsible for the disposal of the material, which included insulating fluids, cleaning fluids, rags and absorbant material and empty drums.

Four of the twelve secondary containment steel trays remain on site and unused; they are stacked in close proximity to the former storage area. The remaining eight trays are currently used to contain non-PCB insulating fluid in drums at the Niagara Transformer Dale Road site. Testing involving these eight trays is included in a separate closure plan. The Seneca Street site is currently used for general storage.

II - 1

#### **III. FACILITY DECONTAMINATION**

A program of wipe testing is proposed to determine PCB residual concentrations remaining at the storage site. The sampling and analysis, described in Appendix C, is to be performed by ACTS Testing Labs of Buffalo, New York. A total of four initial wipe tests are proposed. Two tests would be taken on the storage area concrete floor, in locations chosen at random. The two remaining tests would be taken in two of the four secondary containment trays, again chosen at random. It is proposed that a Department representative be on site during location selection and sampling.

The testing will yield results in terms of micrograms of PCB per square centimeter of surface area (ug/cm<sup>2</sup>). The test results will be compared to a proposed action level to determine subsequent actions. Test results below the action level would be indicative of acceptably low residual PCB levels. Site decontamination would proceed if test results exceed the action level. The proposed action level for this closure is 10  $ug/cm^2$ .

Site surfaces (the concrete surface and/or containment trays) regulations durantee of the durantee of the second d

Following decontamination, repeat wipe testing would be performed on the affected surfaces. If PCB residuals still exceed the action level, a second round of decontamination would occur. Materials, methods and disposal would be identical to the initial decontamination. If a third set of wipe tests determine that the action level is still exceeded, the Department would be approached to discuss supplemental/substitute measures. The site testing and decontamination are graphically depicted in Exhibit V-1.

## IV. CLOSURE CERTIFICATION

The activities occurring on site would be monitored for compliance with the approved closure plan. The properly completed closure would be certified by a registered professional engineer, independent from Niagara Transformer Corporation. The certifying engineer for this plan would be Thomas M. Lewandowski, P.E., acting for Nussbaumer & Clarke, Inc., a corporation registered to practice professional engineering and land surveying in the State of New York, Certificate No. 027.

As the approved closure activities are expected to demonstrate that the site will be closed clean, no periodic inspections following acceptance of the closure plan results and documentation are anticipated.

A sample certification statement follows:

IV - 1

#### STATEMENT

#### NUSSBAUMER & CLARKE, INC. CONSULTING ENGINEERS

Action: PCB Storage Site Closure

- Client: Niagara Transformer Corporation 1747 Dale Road P. O. Box 233 Buffalo, New York 14225 Attention: Mr. Fred W. Darby
- Site: 1600 Seneca Street

This Statement hereby certifies that the Niagara Transformer Corporation Seneca Street PCB Storage Site Closure was performed in accordance with the approved Site Closure Plan dated March, 1987.

NUSSBAUMER & CLARKE, INC.

Вy

Thomas M. Lewandowski, P.E. Vice-President-CEO Engineering

Dated:

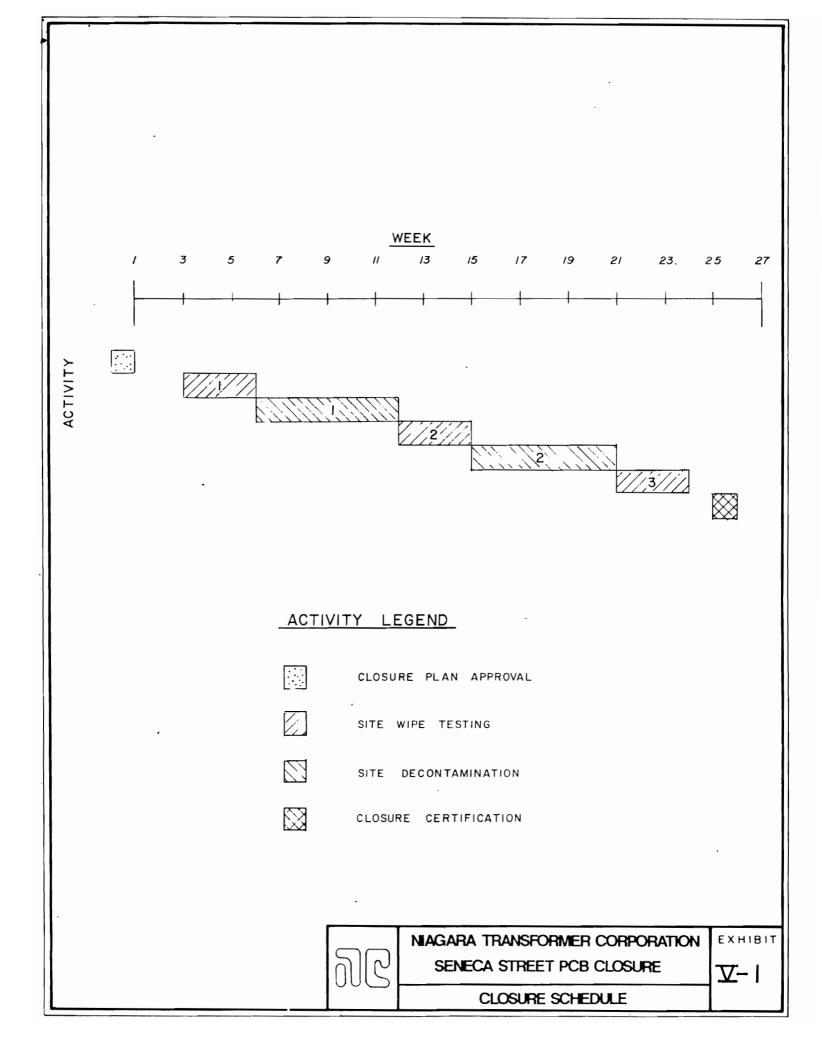
#### V. CLOSURE SCHEDULE

The following exhibit illustrates the proposed schedule of closure activities. The schedule begins at Week 1, corresponding to the formal closure plan approval by the Department. A two-week period follows, which allows for notification of the testing service (ACTS) and the decontamination service (CECOS), as well as preparation of the subject area. Sample taking, analysis and result reporting would occur in the next three-week period. If the measured PCB levels are below the proposed action level, no further testing or decontamination would occur. The Department would be notified of the results and the closure certification would proceed.

If the measured levels exceed the action level, a six-week decontamination period would immediately follow. The actual decontamination is estimated to require only one working day; the balance of the period is necessary for the decontamination service to obtain approvals and make detailed preparations. Testing would be repeated following the decontamination. If residual PCB levels have been reduced below the action level, notification and certification would proceed.

If residual levels remain above the action level, a second round of decontamination, followed by a third round of testing, would occur. It is anticipated that the residuals would be adequately reduced with two decontaminations. If this is determined to not be the case, the Department would be approached to discuss supplemental/substitute measures.

**V** - 1



#### VI. COST ESTIMATE

The cost associated with accomplishing closure is dependent upon the amount of retesting and decontamination that will be necessary. Following are cost estimates for various closure scenarios:

A. Acceptable Levels after Testing Round #1:

Engineering	\$ 540.00
Testing	245.00
Decontamination	0.00
Administration (15%)	118.00
Contingency (20%)	157.00
	\$1,060.00

B. Acceptable Levels after Testing Round #2:

Engineering	\$ 945.00
Testing	440.00
Decontamination	3,250.00
Administration (15%)	695.00
Contingency (20%)	927.00
	\$6,257.00

C. Acceptable Levels after Testing Round #3:

Engineering	\$ 1,350.00
Testing	635.00
Decontamination	6,500.00
Administration (15%)	1,273.00
Contingency (20%)	1,697.00
	\$11,455.00

The above scenarios represent total costs. For example, if two rounds of decontamination are necessary, total closure costs are estimated to be \$11,455.00.

Based upon the history of the site, Scenario A, involving one testing round and no required decontamination, is considered to be the most likely outcome of closure.

# APPENDIX A

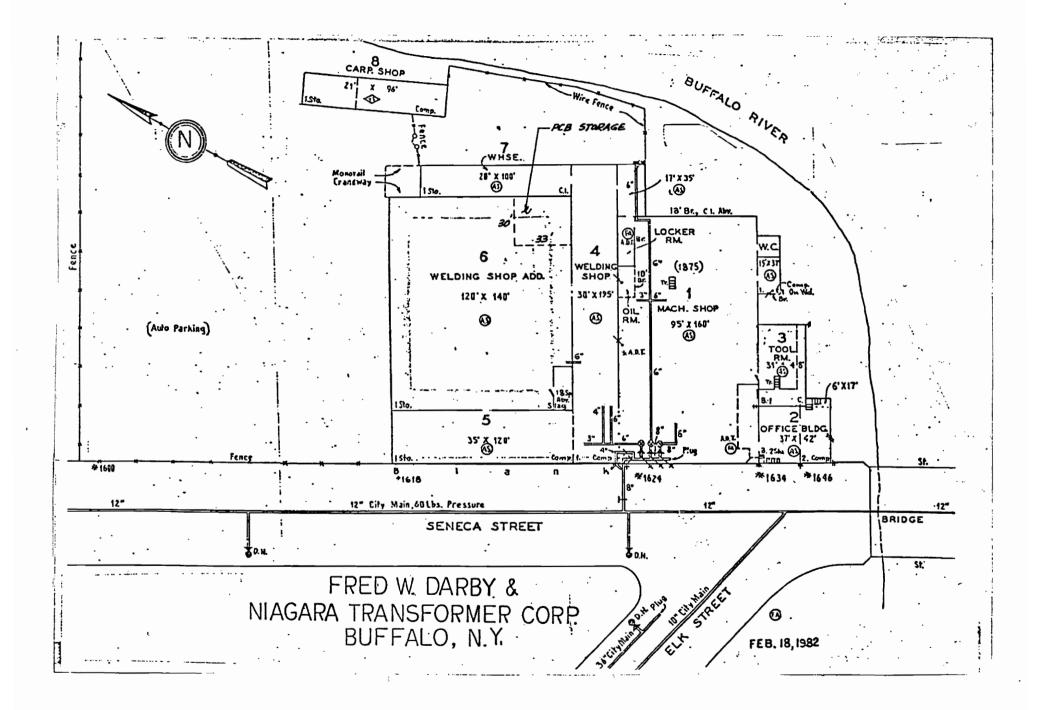
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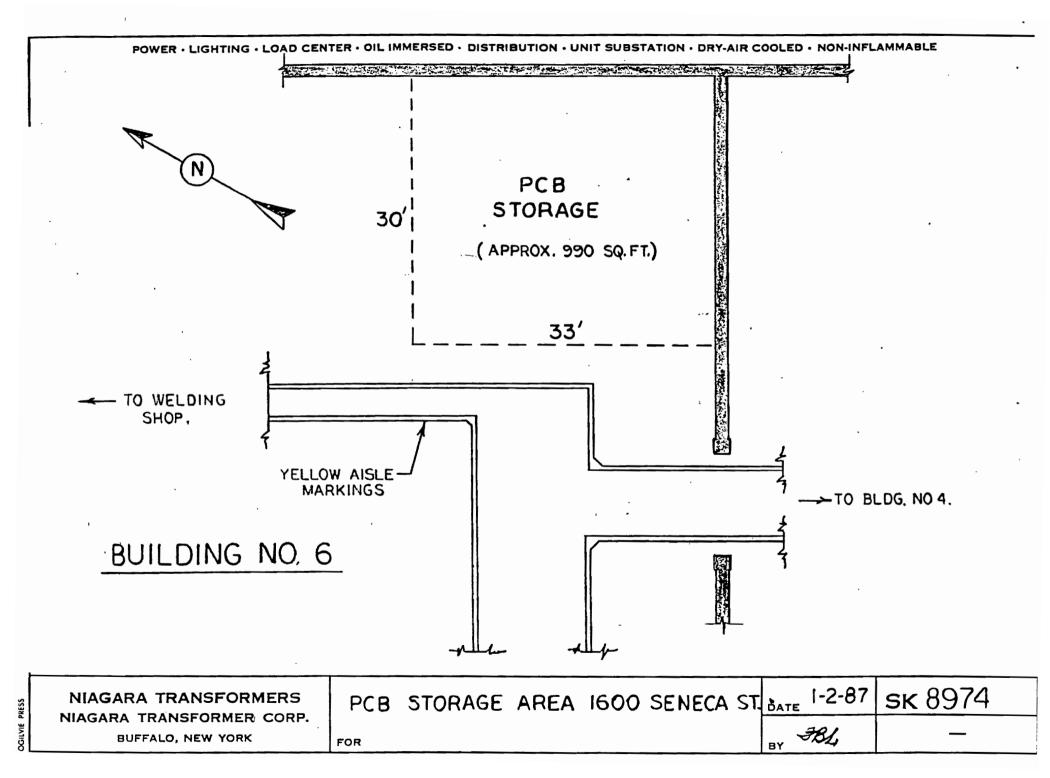
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# SITE PLAN AND STORAGE AREA LAYOUT

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# APPENDIX B

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HAZARDOUS WASTE MANIFESTS

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# SCA CHEMICAL SERVICES, INC. AN SCA SERVICES COMPANY

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1550 Balmer Road

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Model City, New York 14107

Niagara Transformer Co.

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1747 Dale Rd., P.O. Box 233

Cheektowaga, NY 14225

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APPENDIX C

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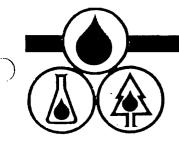
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SITE TESTING

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2321 Kenmore Avenue Buttalo NY 14207 (716) 873-4200 TLX No 70-1533 CECOS But

March 16, 1987

Nussbaumer & Clarke, Inc. 310 Delaware Avenue Buffalo, New York 14202

ATTENTION: Mr. Dave Albers

RE: Niagara Transformer Corp. PCB Storage Site Cleaning

Dear Mr. Albers:

CECOS International, Inc. is pleased to submit this estimate of cleaning costs for the Seneca Street and Dale Road Niagara Transformer loactions.

PLANNING ASSUMPTIONS

1. All work areas will be cleared of equipment and debris.

2. This estimate is for solvent swabbling of the floor areas only.

COST

The following cost is estimated and is for budget purposes only. CECOS does not guarantee decontamination levels with one cleaning.

Seneca Street Lump Sum \$3,250.00 Dale Road Lump Sum \$6,570.00

This price includes disposal of five (5) drums of solid PCB debris (rags and pads). The labor and equipment is estimated for five (5) working days.

We hope that this meets your requirements.

If we may be of further assistance, please feel free to contact us.

Sincerely,

DANIEL O. HOFFNER Estimator

RECEIVED

MAR 1 8 1987

NUSSBAUMER & CLARKE, INC.

DOH/cm cc: F. Virginia ,

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