BOOTH OILCO. SP Entered 932100

02-8710-91-PA Rev. No. 0

PRELIMINARY ASSESSMENT BOOTH OIL CO.

RECEIVED

JAN 1 5 1988

PREPARED UNDER

BUREAU OF HAZARDOUS SITE CONTR DIVISION OF MAZARDO WY ELEMENTE TO

TECHNICAL DIRECTIVE DOCUMENT NO. 02-8710-91 CONTRACT NO. 68-01-7346

FOR THE

ENVIRONMENTAL SERVICES DIVISION
U.S. ENVIRONMENTAL PROTECTION AGENCY

DECEMBER 3, 1987

NUS CORPORATION SUPERFUND DIVISION

SUBMITTED BY:

REVIEWED/APPROVED BY:

ĐÓNNA J. RESTIVO/ PROJECT MANAGER KONALD M. NAMAN FIT OFFICE MANAGER

REGION 2



POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT

02-8710-91-PA Rev. 0

| Booth Oil Co. | NYD002131860 | | | | | |
|--|---------------------------|--|--|--|--|--|
| Site Name | EPA Site ID Number | | | | | |
| 76 Robinson Street North Tonawanda, New York Address | 02-8710-91 TDD Number | | | | | |
| Date of Site Visit: Off-Site Reconnaissance, Novem | nber 9, 1987 | | | | | |
| SITE DESCRIPTION | | | | | | |
| The Booth Oil Co. Site, an inactive site that operated until 1982, is located in an industrial and residential section of North Tonawanda, Niagara County, New York. The New York State Department of Environmental Conservation (NYSDEC) has been working with the Booth Oil Co. in the cleanup and removal of all above- and below-ground storage tanks on the site. All tanks have been removed, and an RI/FS is planned. | | | | | | |
| NYSDEC states that the site is heavily contaminated with oil, and PCBs were found in the oil boom at the Robinson Street storm sewer discharge into the Niagara River. There are three surface water intakes within 1 mile of the site that serve the cities of Lockport, Tonawanda, and North Tonawanda. Groundwater is not used as a drinking water source. | | | | | | |
| PRIORITY FOR FURTHER ACTION: High _ Me | edium No Further Action X | | | | | |
| RECOMMENDATIONS | | | | | | |
| No further action is recommended for this site due to NYSDEC involvement in the removal and cleanup of the site. A followup inspection is recommended, however, to ensure that all cleanup efforts have been made. | | | | | | |
| Prepared by: Donna J. Restivo of NUS Corporation | Date: December 3, 1987 | | | | | |

EPA

POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT

| I. IDENTIFICATION | | | | | |
|-------------------|----------------|--|--|--|--|
| 01 STATE | 02 SITE NUMBER | | | | |
| NY | 0002131860 | | | | |

| PREI | TIMINIAW I | MODEDOMIE | AI I |
|-------------------|------------|------------|------------|
| PART 1 - SITE LOC | ATION AND | INSPECTION | NFORMATION |

| PART 1- SITE | LUCAI | IOW AIV | אכאוו ט | ECHONINA | OKIVI | ATION | NY | 000213 | 1860 |
|---|-----------------------|--------------------------------|------------|--|------------|-----------------------------|--------------------|--|-------------------|
| II. SITE NAME AND LOCATION | | | | | | | | | |
| 01 SITE NAME (Legal, common, or descriptive name of site Booth Oil Company | e) 02 S ⁻¹ | TREET, RO 76 Robinson | | ., OR SPECIFIC L | .OCAT | ION IDENTIFIER | | | |
| 03 CITY | 04 | 4 STATE | 05 ZIP | CODE | 06 | COUNTY | 07 COL | - 1 | 08 CONG DIST |
| North Tonawanda | | NY | 1. | 1120 | | Niagara | 06 | 3 | 32 |
| 09 COORDINATES LATITUDE LONGITUDE 43° 0 1′ 5 8″ N 0 7 8° 5 2′ 3 6″ W | | | | | | | | | |
| 10 DIRECTIONS TO SITE (Starting from nearest public referom Tonawanda take Route 384/265 North to Robinson Stracks. | | r Rtes. 384 ar | nd 265 mee | it. Turn right onto R | Robinsor | n St. The site is on the | left just after ti | ne secon | d set of railroad |
| III. RESPONSIBLE PARTIES | | | | | | | | | |
| 01 OWNER (if known) Booth Oil | | | | REET (Business, mathematics), mathematical (Business, mathematics), mathematical (Business, mathematics), mathematical (Business, mathematics), mathematical (Business, mathematics), mathematics, mathematics), mathematics, math | - | esidential) | | | |
| 03 CITY | 04 | STATE | 05 ZIP | CODE | 06 | TELEPHONE NUN | 1BER | | |
| Buffalo | | NY | 1. | 1210 | | (716) 855-2212 | | | |
| 07 OPERATOR (if known and different from owner) | | | 08 ST | REET (Business, ma | illing, re | sidential) | | | |
| 09 CITY | 0 | 4 STATE | 11 ZIP | CODE | 12 | TELEPHONE NU | MBER | | |
| _ F. OTHER: | ency name) | | | STATE | _ | _ D. COUNTY | _ E. | MUNI | CIPAL |
| (Specify) | | | | | | | | | |
| 14 OWNER/OPERATOR NOTIFICATION ON FILE | | | | | | | | | |
| _ A. RCRA 3001 DATE RECEIVED: | | JNCONTR | OLLED | VASTE SITE (CER | CLA 103 | C) DATE RECEIVE | D: | | ×C. NONE |
| IV. CHARACTERIZATION OF POTENTIAL HAZA | RD | | | | | | | | ···· |
| 01. ON SITE INSPECTION X YES DATE: 10/15/87 MONTH DAY YEAR | _ A. E | _ | _ B. EPA | CONTRACTOR | | × C. STATE F. OTHER: | _ D. OTH | HER CC | NTRACTOR |
| _ NO | (| CONTRAC | TOR NA | ME(S): | | | (Specify) | | |
| 02 SITE STATUS (Check one) A. ACTIVE C | . UNKNO |)WN | 03 \ | 'EARS OF OPER | IJn | known / 1982 | NG YEAR | | UNKNOWN |
| 04 DESCRIPTION OF SUBSTANACES POSSIBLY F | | | | EGED | | | | | |
| PCBs were discovered in the storm sewer discharge from | | | | | | | | | |
| 05 DESCRIPTION OF POTENTIAL HAZARD TO El There are three surface water intakes within 1 mile of th | | | | | awanda. | There is a potential | or direct conta | ct (Cont' | d) |
| V. PRIORITY ASSESSMENT | | | | | | | | ······································ | |
| 01 PRIORITY FOR INSPECTION (Check one. If high c A. HIGH B. MEDIUN | Л | ****** | C. LOW | | | ×D | . NONE | | |
| (Inspection required promptly) (Inspection requi | rea) | (inspect o | on time av | nilable basis) (| NO TUPL | her action needed, cor | iipiete current | urspositio | יייני ויייני |
| VI. INFORMATION AVAILABLE FROM |) 2 OF | | | | | | 09 751 50 | HONE | NUMBER |
| | _ | ency:Organiz: PA, Region 2, | | aw lareau | | | | 321-677 | |
| Diana Messina | | | | | | | | T | |
| 04 PERSON RESPONSIBLE FOR SITE INSPECTION Donna J. Restivo | N FORM | 05 AGENC U.S. EF | | 06 ORGANIZA | | 07 TELEPHONE (201) 225-6160 | | 08 0 | DATE 12.03/87 |

ATTACHMENT

POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT PART 1 - SITE INFORMATION ASSESSMENT

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

because the area surrounding the site is unfenced and easily accessible.

EPA

POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT PART 2 - WASTE INFORMATION

| I. IDENTIFICATION | | | | | | |
|-------------------|----------------|--|--|--|--|--|
| 01 STATE | 02 SITE NUMBER | | | | | |
| NY | D002131860 | | | | | |

| II. WASTE STATE | S, QUANTITIES, AND CH | RACTERIS | TICS | | | | | | | | |
|---|-------------------------------|--|----------------|---------------|---|---|---------------|--|------------------|--|-----------------------|
| 01 PHYSICAL STA | ATES (Check all that apply) | 02 WASTE QUANTITY AT SITE | | 03 WA | 03 WASTE CHARACTERISTICS (Check all that apply) | | | | | | |
| _ A. SOLID _ E. SLURRY _ B. POWDER, FINES _ F. LIQUID _ X C. SLUDGE _ G. GAS _ D. OTHER | | (Measures of waste quantities must be independent) TONSUnknown CUBIC YARDS NO. OF DRUMS | | | _ B | . TOXIC . CORROSIVE . RADIOACT D. PERSISTEN | IVE | E. SOLUBLE F. INFECTIOUS G. FLAMMABI H. IGNITABLE | J. .E K L. | HIGHLY VOLATILE EXPLOSIVE REACTIVE INCOMPATIBLE NOT APPLICABLE | |
| III. WASTE TYPE | | | | | | | | | | | |
| CATEGORY | SUBSTANCE NAME | | 01 GRO | SS AMOU | INT C | 2 UNIT O | F MEASUI | RE 03 | COMMENTS | | |
| SLU | SLUDGE | | Un | known | | | | | | | |
| OLW | OILY WASTE | | Un | known | | | | | | | |
| SOL | SOLVENTS | | | | | | | | | | |
| PSD | PESTICIDES | | | | | | | | | | |
| осс | OTHER ORGANIC CHE | /ICALS | | | | | | | | | |
| ЮС | INORGANIC CHEMICAL | .S | | | | | | | | | |
| ACD | ACIDS | | | | | | | | | | |
| BAS | BASES | | | | | | | | | | |
| MES | HEAVY METALS | | | | | | | | | | |
| IV. HAZARDOUS | SUBSTANCES (See Append | x for most fre | quently cite | d CAS Numb | ers) | | | | | | |
| 01 CATEGORY | 02 SUBSTANCE NAME | 03 CAS N | UMBER | 04 STOR | AGE/DI | SPOSAL N | NETHOD | 05 CO | NCENTRATION | | ASURE OF ENTRATION |
| OLW | PCB | | | Unk | nown | | | (| Inknown | | |
| | | | | | | | | | | 14 | |
| | | | | | | | | اسد تائد | | | |
| | | | | | 1 | 4 | | ندخت ندخت کارگر | | | |
| | <u> </u> | 5.77 | 14228 | 41 | | | | | | | |
| | | | | | | | | | | | |
| | | | | | | | | | | | |
| A | | | | | | | | | | | |
| V. FEEDSTOCKS | (See Appendix for CAS Number | ;) | | L | | | | | | | |
| CATEGORY | 01 FEEDSTOCK NA | | 2 CAS NL | IMBER | CAT | EGORY | 01 | FEEDS | TOCK NAME | 02.0 | AS NUMBER |
| FDS | | | | | F | DS | | | | | |
| FDS | | | | | | DS | | | | | |
| FD\$ | | | | | | DS | | | | | |
| FDS | | | | | | DS | | | | | |
| VI. SOURCES OF | INFORMATION (Cite specif | c references, | e.g. state fil | es, sample ar | nalysis, re | eports) | | | | | |
| | e Department of Environmental | | | | | | echi on 9/21/ | 87. | | | |

02-8710-91-74 Rev. No. 0

Telecon between Matt Cullen, NYSDEC Region 9, and Donna Restivo, NUS Corporation on 11/23/87.

EPA

POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT

PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

NY D002131860

I. IDENTIFICATION

01 STATE | 02 SITE NUMBER

| II. HAZARDOUS CONDITIONS AND INCIDENTS | | | *************************************** | |
|--|---|-----------------|---|------------------------|
| 01 x A. GROUNDWATER CONTAMINATION 03 POPULATION POTENTIALLY AFFECTED: 0 | 02 _ OBSERVED (DATE: 04 NARRATIVE DESCRIPTION |) | <u>x</u> POTENTIAL | _ ALLEGED |
| There is a potential for groundwater contamination due to any oil waste a | and grease on site; however, groundwater is no | it used as a dr | anking water source. | |
| 01 × B. SURFACE WATER CONTAMINATION 03 POPULATION POTENTIALLY AFFECTED: Approx. 80,000 | 02 _ OBSERVED (DATE: | | x POTENTIAL | |
| PCBs were discovered in the storm sewer discharge from Robinson Street in Tonawanda, and North Tonawanda. | tto the Magara River. There are three surface (| vater intexes | Mittin 1 mile or the 20 | e that serve coungers, |
| 01 _ C. CONTAMINATION OF AIR 03 POPULATION POTENTIALLY AFFECTED: | 02 _ OBSERVED (DATE: |) | _ POTENTIAL | _ ALLEGED |
| There is no potential for air contamination; the materials on site are not vo | latile. There are no reports of previous incident | ts of air conta | amination. | |
| 01 _ D. FIRE/EXPLOSIVE CONDITIONS 03 POPULATION POTENTIALLY AFFECTED: | 02 _OBSERVED (DATE: 04 NARRATIVE DESCRIPTION |) | _ POTENTIAL | _ ALLEGED |
| There is no potential for fire/explosive conditions; all the tanks have been re | emoved from the site. | | | |
| 01 x E. DIRECT CONTACT 03 POPULATION POTENTIALLY AFFECTED: 13,174 The potential for direct contact exists; the area surrounding the site is unfe | 02 _ OBSERVED (DATE: | | × POTENTIAL | _ ALLEGED |
| 01 x F. CONTAMINATION OF SOIL 03 AREA POTENTIALLY AFFECTED: Unknown (Acres) The potential exists for the contamination of soil due to any oil waste and | 02 _ OBSERVED (DATE: 04 NARRATIVE DESCRIPTION grease present on site. |) | × POTENTIAL | _ ALLEGED |
| 01 x G. DRINKING WATER CONTAMINATION 03 POPULATION POTENTIALLY AFFECTED: Approx. 80,000 PCBs were discovered in the storm sewer discharge from Robinson Street in Tonawanda, and North Tonawanda. | | | \underline{x} POTENTIAL swithin 1 mile of the sit | _ |
| 01 H. WORKER EXPOSURE/INJURY 03 WORKERS POTENTIALLY AFFECTED: There is no potential for worker exposure/injury as the site is inactive. | 02 _ OBSERVED (DATE: 04 NARRATIVE DESCRIPTION |) | _ POTENTIAL | _ ALLEGED |
| 01 x I. POPULATION EXPOSURE/INJURY 03 POPULATION POTENTIALLY AFFECTED: Approx. 80.000 The potential for population exposure/injury exists through direct contact potentially contaminated water from surface water intakes on the Niagara | | ced area. The | | ē |
| potentially containmated water from surface water intakes on the Magain | a river used by Lockport, Tollawalida, and North | ii i Ollawalius | 3. | |

EDA

POTENTIAL HAZARDOUS WASTE SITE **PRELIMINARY ASSESSMENT**

I. IDENTIFICATION

02 SITE NUMBER

| PART 3 - DESCRIPTION OF HAZARDOUS | CONDITIONS AND INCIDENTS | 01 STATE U2 3 | 0002131860 |
|--|---|------------------------|--|
| . HAZARDOUS CONDITIONS AND INCIDENTS (CONTINUED) | | | |
| 1 <u>×</u> J. DAMAGE TO FLORA 4 NARRATIVE DESCRIPTION | 02 _ OBSERVED (DATE:) | × POTENTIAL | _ ALLEGED |
| The potential exists for damage to flora due to any oil waste and grease preser | nt on site that may contaminate the soil. | | |
| 01 x K. DAMAGE TO FAUNA 04 NARRATIVE DESCRIPTION (Include name(s) of species) The potential exists for damage to fauna due to any oil waste and grease preserves. | 02OBSERVED (DATE:) nt on site with which animals may come in direct co | | _ ALLEGED |
| 01 L. CONTAMINATION OF FOOD CHAIN 04 NARRATIVE DESCRIPTION | 02 _OBSERVED (DATE:) | _ POTENTIAL | _ ALLEGED |
| The potential for contamination of the food chain does not exist; PCBs are not | bioaccumulative. | | |
| 01 × M. UNSTABLE CONTAINMENT OF WASTES (Spills. Runoff, Standing liquids, Leaking drums) 03 POPULATION POTENTIALLY AFFECTED: 13,174 | 02 _OBSERVED (DATE:) 04 NARRATIVE DESCRIPTION | _ POTENTIAI | _ <u>x</u> ALLEGED |
| PCBs were discovered in the storm sewer discharge from Robinson Street into t | he Niagara River. | | |
| 01 x N. DAMAGE TO OFF-SITE PROPERTY 04 NARRATIVE DESCRIPTION | 02 _OBSERVED (DATE:) | <u>x</u> POTENTIAL | _ ALLEGED |
| The potential for damage to off-site property exists due to materials present o | in site migrating off site. | | |
| 01 x O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPs | 02 _ OBSERVED (DATE:) | _ POTENTIAL | <u>x</u> ALLEGED |
| 04 NARRATIVE DESCRIPTION PCBs were discovered in the storm sewer discharge from Robinson Street into 1 | the Niagara River. | | |
| 01 _ P. ILLEGAL/UNAUTHORIZED DUMPING 04 NARRATIVE DESCRIPTION | 02 _OBSERVED (DATE:) | _ POTENTIAL | _ ALLEGED |
| There is no known evidence of illegal/unauthorized dumping. | | | |
| 05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALL | EGED HAZARDS | | |
| There are no other known, potential, or alleged hazards. | | | |
| III. TOTAL POPULATION POTENTIALLY AFFECTED:Approx. 80.0 | 000 | | |
| IV. COMMENTS | | | |
| None | | | |
| | | | |
| V. SOURCES OF INFORMATION (Cite specific references, e.g. state files, sa | ample analysis, reports) | | ······································ |
| Telecon between Matt Cullen, NYSDEC Region 9, and Donna Restivo, NUS Corp., Moran and Peter Buechi on 9/21/87.//Letter from Edward Belmore, NYSDEC Regio Corp., Graphical Exposure Model Systems (GEMS), Landover, Maryland, 1986.//Ne | on 9, to Paul Sikora, Assistant City Attorney, City of I | North Tonawanda, 9/19/ | 85.//General Sciences |

ATTACHMENT

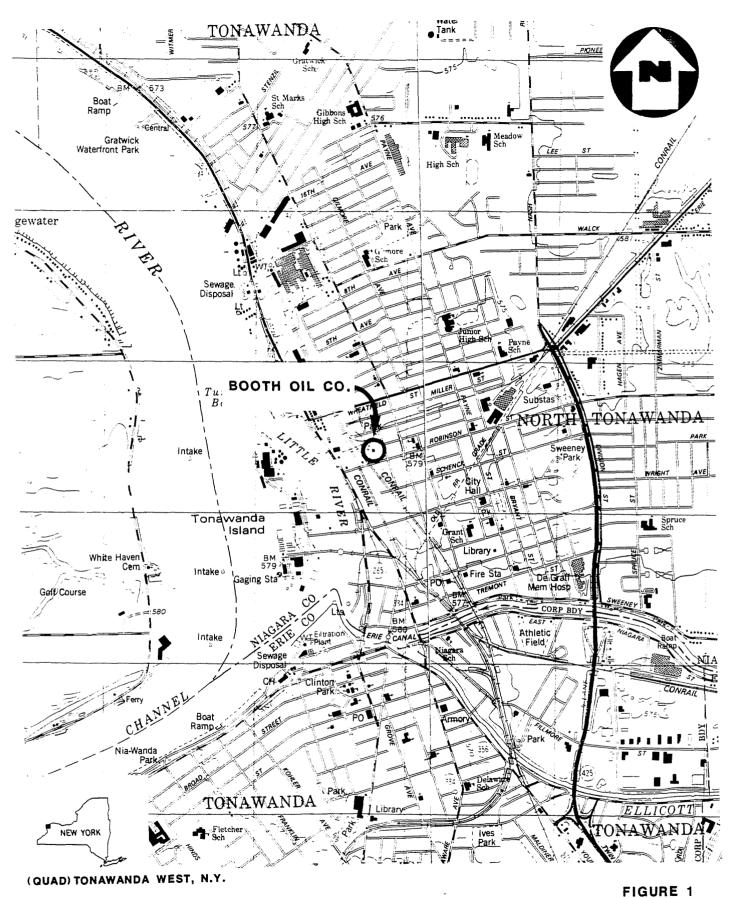
POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

V. SOURCES OF INFORMATION (Cite specific references, e.g. state files, sample analysis, reports)

Sources, 1982.//Off-Site Reconnaissance Information Reporting Form, TDD No. 02-8710-91, NUS Corporation Region 2 FIT, Edison, New Jersey, November 9, 1987.//Telecon between Mr. McDonough, North Tonawanda Water Department, and Donna Restivo, NUS Corporation, 11/24/87.

APPENDIX A

MAPS AND PHOTOGRAPHS



SITE LOCATION MAP BOOTH OIL CO., N. TONAWANDA, N.Y. NUS

SCALE: 1'= 2000'

02-8710-91-PA Rev. No. 0 NIAGARA RIVER 8 DEBRIS ш \supset RAILROAD TRACKS RAILROAD TRACKS 0 GARAGE PARKING LOT Œ GARAGE BOOTH OIL CO. R + O BINS O N S T EET LAWLESS CONTAINER co.

FIGURE 2

SITE MAP

BOOTH OIL CO., NORTH TONAWANDA, N.Y.



BOOTH OIL COMPANY NORTH TONAWANDA, NEW YORK TDD No. 02-8710-91 NOVEMBER 9, 1987

PHOTOGRAPH LOG

BOOTH OIL COMPANY NORTH TONAWANDA, NEW YORK TDD NO. 02-8710-91 NOVEMBER 9, 1987

PHOTOGRAPH INDEX

| Photo Number | Description | Time |
|--------------|---|------|
| 1P-19 | Facing the site from Robinson Street, looking at the one-car garage. Photographer: Robert Nies. | 1250 |
| 1P-20 | Facing the site from Robinson Street, looking at four-car garage. Photographer: Robert Nies. | 1252 |
| 1P-21 | Facing east from parking lot view of site. Photographer: Robert Nies. | 1300 |



BOOTH OIL COMPANY, NORTH TONAWANDA, NEW YORK



1P-19 November 9, 1987 1250
Facing the site from Robinson Street, looking at the one-car garage.
Photographer: Robert Nies.



1P-20 November 9, 1987 1252
Facing the site from Robinson Street, looking at the four-car garage.
Photographer: Robert Nies.



BOOTH OIL COMPANY, NORTH TONAWANDA, NEW YORK



1P-21 November 9, 1987 1300 Facing east from parking lot view of site. Photographer: Robert Nies.

APPENDIX B BACKGROUND INFORMATION

| CONTROL NO DATE / / TIME | |
|--|--------------|
| 11/23/87 1000 | |
| DISTRIBUTION | |
| | |
| | |
| | |
| BETWEEN OF ANS TOP PHONE | |
| 1 090 900 | |
| AND Region 9 1716/847-41 | 600 |
| Donna Mestivo | \. \$ |
| DISCUSSION: | 1 |
| I asked Mr. Cullen it the VT-60 tank ha | <u>d</u> _ |
| been removed and he said that it has | |
| been removed from the Robinson St. site. | |
| | |
| | |
| inactive site that is undergoing testing. | Λì |
| the said the site is an oil spill site and PC | 18'S |
| have been found in the outfail from sewers o | 1 |
| Robinsof. He also said that the ground we | <u></u> 20 |
| sampled around the removed 17-60 tank | |
| at 5 spots and 13,000 ppm of nonhazard | 2115 |
| o'll and grease were discovered. Mr. Culler | |
| | , |
| | |
| Seven were removed by the DEC. | |
| I asked Mr. Cullen what is being done as | |
| for as remediation, he said that Booth Dil | |
| ACTIONITEMS. Drobably be givenanto the enforcement | |
| group to identify PRPS. "123/87 | - |
| 9100p 10 herry 111s. | |
| | |
| - All Holling | |
| Jonnay, Postoro | |
| 11/23/87 | |
| | |

| TELECONN |
|--|
| CONTROL NO COATE / / |
| C2-871C-91 11/24/87 240 |
| DISTRIBUTION |
| |
| |
| |
| BETWEEN |
| Mr. Mc Donough OF North Tonawanda PHONE 1716/695-853 |
| AND Water Dept, (716) 695-853 |
| Donna Restivo |
| DISCUSSION: DRIFE4/87 |
| I asked MFr. McDonough if there were any |
| |
| Call 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 |
| Said that there were not. Everyone is on city |
| water. |
| Change All I |
| Sonna J. Restovo |
| 111/24/87 |
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| CTION ITEMS: |
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New York State Department of Environmental Conservation

Sile oil

MEMORANDUM

TO:

DATE:

Mr. James Moran

FROM: Mr. Peter Buechi

BOOTH OIL CO., INC., NORTH TONAWANDA, N.Y.

SUBJECT: BOOTH OIL CO., INC., NORTH

YOUR MEMORANDUM OF AUGUST 7, 1987

SITE #932100

September 21, 1987

There has been a continuing program to close this Booth Oil Inactive Site. All processing operations were stopped in 1982 when Booth Oil moved to Katherine Street.

All aboveground and belowground tanks have been cleaned and removed from site except VT-60. That tank was separately permitted under Part 360 Permit No. 3425. It has been cleaned and awaits demolition (expected within the next month). Once tank removal has been accomplished, soil conditions under the tank can be evaluated as part of the overall inactive site closure.

The overall site is heavily contaminated with oil. During the last two heavy rainfalls, oil with PCB's was found in the oil boom at the Robinson Street storm sewer discharge into the Niagara River.

Closure progress at the site has been delayed by the fact that Booth Oil itself remains under Chapter 11 bankruptcy. Breslube Enterprises had been supplying money and personnel to keep minimum work going but, given the probable extent of the site remediation effort, their voluntary commitment is doubtful.

DEE will be requested to issue a demand letter to the PRP's (generators, suppliers and Booth Oil Co.) for implementation of an RI/FS. Final closure of this site will depend on the results of the RI/FS.

The final closure of separately permitted VT-60 (Permit 3425) will also await final site closure. However, we do not see the necessity for continued Compliance Inspections.

We will keep you copied on future correspondence and actions pertaining to the facility.

MC:sz

cc: Mr. Edward Belmore

Mr. John Tygert√ Mr. Edward Feron

Mr. Paul Counterman

Mr. David Mafrici

Mr. John Middelkoop



New York State Department of Environmental Conservation

MEMORANDUM

o: Peter Buechi, Regional Sol

Peter Buechi, Regional Solid & Hazardous Waste Engineer, Region 9 James Sibbald Moran, Supervisor, Facility Permit Section

FROM: James Sibbald Moran, Supervisor, Facility Permit Sect subject: Booth Oil - North Tonawanda, EPA ID No. NYD002131860

DATE: AUG 0 7 1987

gion 9

Based upon inspection reports, we believe Booth Oil is being closed. Since this section has not been informed, we assume that your Region has taken responsibility for the review of that closure. Please keep us informed of all correspondences and actions pertaining to the facility. Most importantly, copy us on the certification of closure for the RCRA regulated units, and keep us up-to-date on the corrective actions to remediate the soil and groundwater located on and around the site. Once certification of RCRA closure is received by this office, we can remove them from the active list of TSDF's. Additionally, once those corrective action measures are complete, we can begin to terminate their Part A Permit and interim status. Thank you for your cooperation.

cc: D. Mafrici

E. Belmore

J. Middelkoop

500 Delaware Avenue, Buffalo, New York 14202-1073

File Booth No Ename

September 19, 1985

Mr. Paul Sikora Assistant City Attorney City of North Tonawanda 216 Payne Avenue North Tonawanda, New York 14120

Dear Mr. Sikora:

Proposal for Cleanup of the Booth Oil North Tonawanda Site.

As agreed in your September 19, 1985 telephone conversation with Mr. Matt Cullen, attached please find a proposal by Mr. David Peele of Booth Oil for removing tanks and miscellaneous structures from their North Tonawanda site. This removal (Phase 1) is preliminary to site investigation and cleanup.

We request you review the Proposal with those departments responsible for environmental and safety with the intent of meeting with Mr. Cullen and Mr. Peele to confirm details on Mr. Peele's return from vacation.

We do request this meeting during the week of September 30, 1985 to allow the demolition to proceed in October. Please call Mr. Cullen at 847-4590 to arrange the meeting.

Sincerely,

Edward Belmore, P.Z. Associate Chemical Engineer

MC:vu

attachment: proposal

cc: Mr. E.J. Feron

PROPOSAL FOR NORTH TONAWANDA

Date: <u>Aug. 29, 1985</u>

1. CURRENT STATUS OF TANKS AT NORTH TONAWANDA,

A list of all tanks located at the North Tonawanda Facility is given below. The capacity and current inventory level of each tank is given.

| Tank= | Capacity | Current Inventory | Future Use |
|-----------------|-------------|-------------------|-----------------------|
| 51 | 12,000 G | МТ | Scrap |
| 52 | 12,000 G | τ MT | Scrap |
| 53 | 12,000 G | ™ MT | Scrap |
| 54 | 45,000 G | 17,350 Sludge | Scrap |
| 56 | 20,000 G | ₩ MT | Scrap |
| 57 | 45,000 G | · a MT | Scrap |
| 58 | 45,000 G | MT | Scrap |
| 41 | 19,650 G | ==2,000 Sludge | Remove,Clean |
| 42 | 19,650 G | 4,000 Sludge | & Transport |
| 43 | 19,650 G | | To Syracuse |
| 22/23 (One Tani | k) 20,000 G | 3 Jan 2000 Sludge | |
| Acid Tank | 3,000 G | MT | Katherine St. |
| 60 | 500,000 G | 30,000 Sludge | Not included in scape |
| Spare Tank | 4,000 G | MT | Katherine St. |
| Spare Tank | 2,000 G | MT | Katherine St. |
| 14 | 15,000 G | TM | Scrap |
| 15 | 15,000 G | [®] MT | Scrap |
| 16 | 12,000 G | -17 | Scrap |
| Treatment Tank | 12,000 G | MT | Scrap |
| Acid Tank | 8,000 G | MT | Scrap . |
| Distillate Tank | 12,000 G | MT | Scrap |
| Distillate Tank | 12,000 G | ŤMΤ | Scrap |
| Distillate Tank | 8,000 G | ₽T | Scrap |
| Batch Still | 12,000 G | ĤΤ | Scrap |
| Fuel Tank | 1,000 G | MT | Katherine St. |
| Fuel Tank | 1,000 G | 阵 T | Katherine St. |
| Air Receiver | | ्रहें अज्ञ | Katherine St. |
| Fiberglass | 1,000 G | MT, | Katherine St. |

| <u>Tank</u> # | Capacity | Current Inventory | <u>Future Use</u> |
|---------------|-------------|-------------------|-------------------|
| 45 | 15,000 G | Rain Water | Scrap |
| 46 . | 15,000 G | i d | Scrap |
| 47 | 15,000 G | ri . | Scrap |
| Between the | Rail Tracks | Rain Water_ | |
| Total Invent | Cory | 57,350 | |

1. All the above tanks are constructed of steel unless otherwise noted.

Samples have been taken from each tank which indicated that the contents comprised -50% water, 30% oil and 20% sludge. The oil samples were tested for PCB's and results showed PCB levels below Federal allowable limits. The sludge could not be sampled until recently because it lay under the water or oil. Retains from each tank are currently being analysed for PCB's and a full report will be issued to NYDEC when complete.

The sludge from Tank 60 passed the EP toxicity test (results given to NYDEC on July 31, 1985).

All the wastes removed to date from the North Tonawanda Facility have been treated at Booth Oil's Katherine Street Plant. The water and oil nave been seperated-water receiving further treatment to meet Buffalo Sewer Authority standards prior to discharge to the sewer and the oil has been blended and subsequently sold as road oil for out of state use.

2. CURRENT STATUS AT BOOTH CIL CO., INC.

On June 6, 1985, Booth Cil Co., Inc. petitioned for U.S. Bankruptcy court under Chapter 11 of the Bankruptcy code in order to obtain temporary relief from certain factors which made continued operations under its present organization impossible. Despite the financial crisis, Booth Cil has endeavoured to continue the clean-up of its facility at North Tonawanda. Since the beginning of the year a total of about 250,000 gallons of liquid has been removed form the site and treated. Sampling and analysis work has been carried out to determine the nature of the waste and its disposal. Booth Cil personnel have established a scope of work for the clean-up operations and prepared proposals for the clean-up. As a result Booth Cil is now ready to undertake Phase I of the clean-up process indentified below.

3. TOTAL SCOPE OF THE CLEAN-UP

The clean-up operation at the Facility comprises four distinct phases of work which are briefly outlined below.

Phase I

The scope of Phase I will include the removal of all the above ground and below ground storage tanks and the demolition and removal of all non-prick structures. The only storage remaining after completion of Phase I will be Tank 60, the underground tank between the rail lines on the western parcel of land and the gas and diesel storage tanks associated with the garage. Removals of these tanks is detailed in Phases 3 and 4.

The schedule for Phase I will be; commence work end August/beginning September and complete operation by November 1985.

A detail description of the Phase I operation is given later.

Phase 2

The Phase 2 will involve a site investigation to determine if any contamination of the ground has occurred and if so, establish the extent. This investigation will include results and analysis of the performance of the existing drawdown wells as well as sampling and analysis of soil. In addition, a survey will be conducted to determine the size and location of underground tanks between the rail tracks.

A plan for Phase 2 will be developed by Booth Oil and submitted to the NYDEC for review. This will be done by late 1985 so that agreement may be reached regarding the scope of work in order to commence site investigations by May 1986. In the meantime, the drawdown wells will be monitored and samples of any oil from the wells will be analysed.

Phase 3

Phase 3 would include all the work deemed necessary after review of results obtained from Phase 2. The scope would include removal of the remaining underground tanks (with the exception of the diesel and gas tanks associated with the garage), removal of contaminated soil and reinstating the land.

The time schedule for this work will be dependent upon the results and recommendations from Phase 2, but it is anticipated that this will be complete before the end of 1988.

Phase 4

Phase 4 will be the removal of Tank 60 and clean-up of the adjacent property. The time period for this Phase will be before the end of 1986. A plan will be developed for Phase 4 and submitted to NYDES before the end of 1985.

| 4. | (a) Review of proposal by D.E.C. (b) Presentation of proposal to City of North Tonawanda (c) Letters will be issued to - (i) Lawless Container Co. advising them to notify their employees that demolit | | Action By | <u>Date</u> | |
|----|--|--|------------|-------------------------|---|
| | | | D.E.C. | August 16, 1985 | 3 |
| | | North Tonawanda | Booth/DEC | August 22, 1985 | 5 |
| | | (i) Lawless Container Co. advising them to notify their employees that demolition work will be commencing and not to park their cars on Booth's lot. It is expected that some cars will have to be | n | | |
| | | towed away. (ii) The local fire and police departments to advise of the dates, durations and nature of activities. Information will be provided to the fire department with regard to the contents of the tanks; nature, physical and chemical properties | Booth | August 23, 1985 | |
| | | etc. | Booth | August ⊉3, 199 5 | , |
| | (d) | A demolition permit will be obtained by the contractor | Contractor | Prior to commencement | • |
| | (e) | Scope of Work - | | | |

(i) All wooden coverings will be demolished and removed to a landfill site.

(ii) One tank will be designated as a sludge collection tank to retain all sludges collected from individual tanks. The sludge is not "free-flowing" and a vacuum truck will be used to pump the fluid. To save transport time, a small capacity vacuum truck will discharge all collected residues into the above designated tank, where it will be diluted with water so that it can be pumped with the centrifugal pumps used on the tractor, units.

Booth Oil will then remove the residues from the facility using large capacity tractor/trailer units and dispose of them.

(iii) Disposal of the residues outside of Booth Oil's facilities will be agreed with NYDEC before operations commence.

Proposals at this time include-

- siting some of the North Tonawanda tanks at Booth Oil's Katherine Street plant and using these tanks to store the residue until they can be treated.
- disposal to a landfill site.
- (iv) If the studge-cannot be removed by pumping it may be necessary to place a person inside some tanks to assist with removal. A man will only be put into a tank if absolutely necessary. He will be equipped with a breathing face mask, fed with fresh air via an external pump (breathing air certified) and a life line connected to a point outside the tank. Another person will be designated as an observer outside the tank to continuously watch the man in the tank. In the event of an accident, the man in the tank will be pulled out using the life line. (wrist or ankle connections will be considered).
- (v) If the size of the tanks enables them to be transported in one piece, then burning equipment will not be used. If burning equipment is to be used the following precautions will be taken-
 - (1) The tank internal will be cleared and all liquid—wastes removed. The only residue—that may be present would be a sludge that cannot be moved by blasting with water jets and removed by a vacuum pump.
 - (2) Fire extinguishers will be available at the point of burning.
 - (3) One person will be designated as a fireman.
 - (4) The tank will be connected to a carbon monoxide source which will purge the tank internal of any oxygen and provide internal positive pressure. This snould minimise the possibility of ignition. Prior to burning an oxygen reading will be taken.
 - (5) All liquids will be removed from the tanks before any demolition work is started. If solid sludge is present in the tank, any cutting will be above this level. Residues will then be shovelled out. It is highly unlikely therefore that

CO peni CO peni mixture?

there could be a spill. However as a precaution, shovels, absorbent materials, containment booms and a vacuum truck will be available.

(6) All above ground and below ground tanks will be removed with the exception of tank 60, diesel and gas tanks associated with the garage and the underground tank situated between the rail tracks on the western parcel.

(vii) Safety Precautions-

- (a) There will be a minimum of two people on the facility at all times during demolition work.
- (b) Signs will be posted advising of danger
- (c) The work site will be secured each night at the end of work. Tanks will be left in a safe manner and any excavations will be barricaded
- (d) Fire extinguishers will be available at all times at the facility. A fire hose will also be available.
- (e) The telephone at the facility is operational and will be used to request assistance or as a means of communication in the event of an accident.
- (f) Clean up equipment will be available vacuum truck, shovels, absorbent material,
- (g) Safety equipment Telephone, explosimeters, oxygen level meter, breathing air mask, life-lines, pick-up trucks.
- (h) The company watchmen will provide security patrol at the facility.
- (i) Extreme care will be taken when removing underground tanks, 45.46, and 4/, since these are close to the property line. Once the tanks are removed the area will be promptly backfilled, with imported fill.
- (j) During burning operation, supervision will be provide by Booth Oil.
- (k) The personnel assigned to carry out the work are qualified in the following areas - burning and welding, demolition and transportation. Two of the people wno will perform the cutting have worked for Booth Oil on many occassions at both the Robinson Street and Katherine Street Facilities. All three people have previous experience in demolition and removal of used tanks and equipment.
- (viii) The contractors carry individual insurances. In addition Booth Oil will provide general liability insurance coverage.

5. PARAMETERS OF THE PROPOSAL

The above works and time schedules represent our best estimates. While we will endeavour to follow the plans outlined, financial or operational constraints may result in changes to these plans. However, we wish to assure all parties concerned that Booth Oil is fully prepared to co-operate with the NYDEC and the City of North Tonawanda to expidite the clean-up of the North Tonawanda Facility to a mutually agreeable conclusion.

1982 Water System Sources New York State Atlas of

- 1

NEW YORK STATE DEPARTMENT OF HEALTH
DIVISION OF ENVIRONMENTAL PROTECTION
BUREAU OF PUBLIC WATER SUPPLY PROTECTION



| 1D NO | COMMUNITY WATER SYSTEM | POPULATION | SOURCE |
|--|--|------------|---|
| Munic | apal Community | | |
| 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 | Akron Village (See No 1 Wyomi Page 10). Alden Village. Angola Village. Buffalo City Division of Wate Caffee Water Company. Collins Water District #3. Collins Water Districts #1 and Erie County Water Authority (Sturgeon Point Intake). Erie County Water Authority (Van DeWater Intake). Grand Island Water District #1. Holland Water District #1. Lawtons Water Company. Lockport City (Niagara Co). Niagara County Water District Niagara Falls City (Niagara Co). North Collins Village. North Tonawanda City (Niagara Orchard Park Village. Tonawanda City. Tonawanda City. Tonawanda City. Vanakah Water District #1. Wanakah Water Company. | | Lake Erie Lake Erie Wells Wells Wells Lake Erie Niagara River - East Branch Niagara River Wells Wells Niagara River - East Branch Niagara River - West Branch Niagara River - West Branch Niagara River - West Branch Wells Niagara River - West Branch Pipe Creek Reservoir Wells Niagara River - East Branch Niagara River - East Branch Niagara River - East Branch |
| Non-N | Aunicipal Community | | |
| 22 23 24 25 26 27 29 31 32 33 34 35 36 37 38 40 | Aurora Mobile Park. Bush Gardens Mobile Home Park. Circle B Trailer Court. Circle Court Mobile Park. Creekside Mobile Home Park. Donnelly's Mobile Home Court. Gowanda State Hospital. Hillside Estates. Hunters Creek Mobile Home Park Knox Apartments. Maple Grove Trailer Court. Millgrove Mobile Park. Quarry Hill Estates. Springwille Mobile Park. Springwood Mobile Village. Taylors Crove Trailer Park. Valley View Mobile Court. Villager Apartments. | | .Wells .Wells .Wells .Wells .Wells .Clear Lake .Wells |



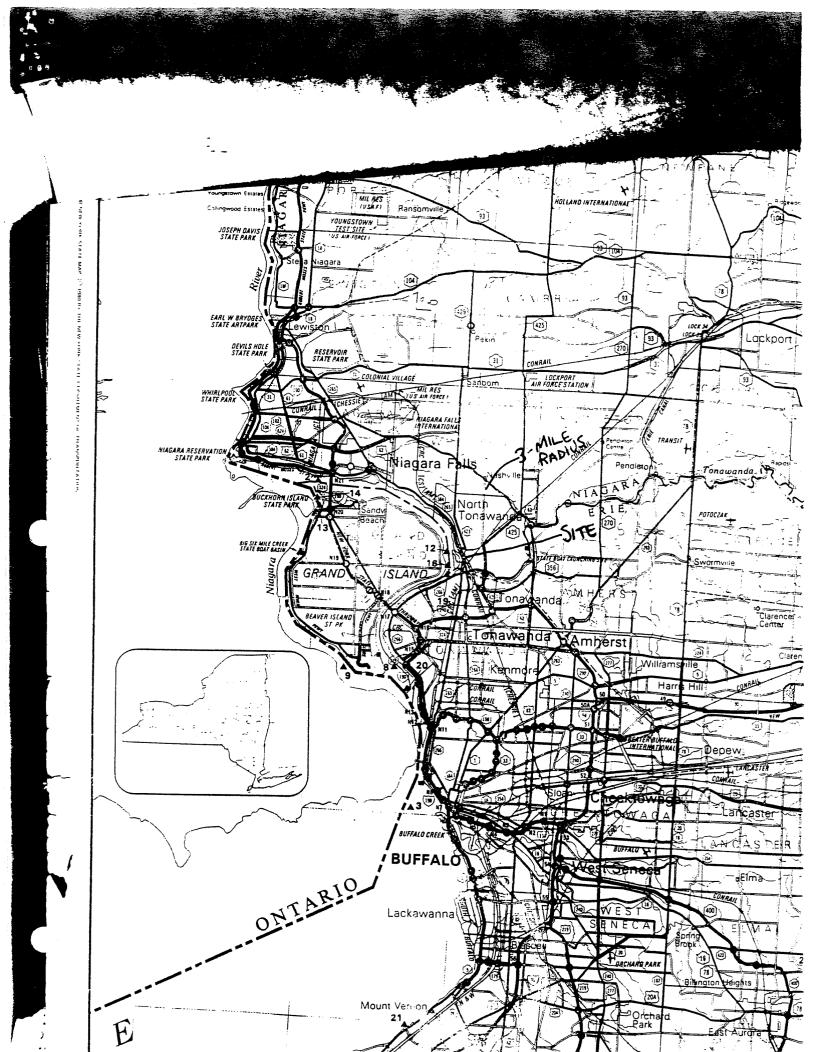
COMMUNITY WATER SYSTEM POPULATION SOURCE

Municipal Community

Lockport City (See No 12, Erie Co). 25000

Non-Municipal Community

3 Country Estates Mobile Village. 28. . . Wells





January 10, 1986

New York State Department of Environmental Conservation 600 Delaware Ave. Buffalo, New York 14202

Attn: Mr. Jim Feron

Dear Mr. Feron:

Proposal for Clean-up of North Tonawanda Site.

1. Status of Clean-up

(a) Phase I

Phase I has been progressing well despite the late start caused by slow mobilization of the contractor and delays with the analysis of tank sludges. A total of 21 above ground tanks have been cleared and removed from the site. Five tanks remain-2 acid tanks and tank numbers T41, 42, 43. It is anticipated that these will be removed from the site before January 24, 1986.

The three underground tanks, T45, 46, 47 on the Eastern Parcel will be removed before the end of January 1986 (assuming no serious bad weather).

In addition to the above work, we are considering demolition of the office building on the Western Parcel. The rubble from the building would be used to fill the excavation of tanks T45, 46, 47. As requested by your Department at the meeting with the City of North Tonawanda, the excavation will be filled promptly.

This will complete the Phase I activity of the Clean-up.

(b) Phase 2

Appendix A contains extracts from the "Final Closure Plan" prepared for Booth Oil in November 1981. The report details that considerable drilling was undertaken and monitoring wells installed which were sufficient to determine:

- (i) Subsoil conditions
- (ii) Groundwater quality and condition
- (iii) Groundwater levels, flow and flow direction

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Marin 19 1987

New Action we had for the second second for the second sec

"Final Closure Plan"

prepared for Booth Oil Co., Inc.

submitted by

Waste Resource Associates, Inc.

The section of the se

November 24, 1981

RECEIVED

JAN 1 0 1986

N Y S. DEPT. OF ENVIRONMENTAL CONSERVATION REGION 9

OIL AND WATER RECOVERY FROM DRAWDOWN WELLS

| Pillon ik | INSTALLED | REMOVED | DRAWOWN | NET WAGHT | CSSER VATIONS |
|--------------|-----------|-------------|-------------|------------------|---|
| | 1 FES 85 | 15 Jul 35 | EAST PARCEL | 12 生 | |
| 2 | 1 FEB 85 | 17 APE 85 | WEST PARCEL | 15 4 | |
| 3 | 17 APR 85 | الا عرد علا | West Preca | 16 4 | WATER DRIPPING FROM PILLOW |
| 4 | 15 Jul 85 | 10 ∞T 85 | EAST PARCEL | _ | NO ASSERTION, WATER IN WELL |
| 4* | 10 OCT 85 | 17 OCT 85 | WEST PARCEL | 18 ^{il} | WATER DRIPANG PILLOW CNLY STAINED W CIL |
| 6 | 15 Jul 85 | 30 Jul 85 | " | 17 4 | " , ALTHOUGH OR IN PILLOW |
| 7 | 30 Jul 85 | 14 AUC 85 | " | 13 ^{eL} | " " |
| 8 | 14 Aug 85 | 24 SS 85 | • | 15 | WATER DRIPPING, PILLOW ONLY STAINED W CIL |
| 9 | 24 500 85 | 10 OCT 85 | " | 17 4 | |
| ر, ا | 20 wen 82 | _ | EAST PARCEL | | NO ABOUTION, WATER IN WOLL 9 JAN 86 |
| 11 | 20 NOV 35 | | WEST PARCEL | 44 | 21 NOV / 85 WATER ONLY |
| - | | | | 12 4. | 22 NOV 185 " |
| | | | - | (S ⁴ | 25 Nov 185 4 |
| | : | : : | | 1524 | 26 NOV 185 0 |
| | | | | 157± | 27 NOV 185 PILLOW SQUEEQED TO RELEASE |
| :] | | | | 12 * | 27 NOV 185 WATER & RETURNED TO LIEUR |
| | | | | 134 | 4 DEC / 83 S PILLOU SOLLEGED TO RELEASE |
| | | 4 Dec 85 | | 12 # | 4 DEC /85 WATER & RETURNSO TO WELL |
| 12 | 4 ٥٠٠ 85 | | WEST PARCEL | 12" | 10 DEC /85 WATER ONLY |
| | | 10 DEC 55 | | 9" | 10 DEC /85 PILLOW SOLLEEDED AS ABOUT |
| 13 | io nëe 85 | | WEST PARCEL | 124 | 17 0EC/85 WATER ONLY |
| | | | | 14 " | 9 JAN /86 SWATER ONLY - PILLOWED |
| | | | | ((, # | 9 Jul 186 C SQUEEDED |

[#] PILLOW IN 4 WAS TRANSFERRED FROM EAST PARCEL TO WEST PARCEL SINCE ONLY WATER WAS EVIDENT IN EAST PARCEL WELL.

PILLOWS IN 5 AND IN 10 WERE NOT INSTALLED IN EITHER WELL

TABLE 2
SAMPLE RESULTS

| DATE | SAMPLE SOURCE | РСВ РРМ |
|------------|---|----------------|
| OCT / 84 | WESTERN PARCEL DRAW-DOWN WELL (OIL PHASE) | 251 180 |
| 28) WELL | - (WATER PHASE) | L.T. I |
| 31 Jul 185 | PILLOW # 6 SEWER SAMPLE | 92-6 L.T. 9 |
| | | |

The drawdown well system has been monitored and evaluated since that time. By October 1982, the oil recovery from the Western Parcel had decreased to around 10 gallon/day. Since 1982, the oil recovery has decreased steadily. The last oil recovered from the Eastern Parcel was July 1985. The oil recovery rate for the site for 1985 is shown in Table 1.

Throughout 1985, the amount of oil recovered in the pillows was noticeably decreasing. When the pillows were squeezed after weighing, the concentration of oil became less as the year progressed. Around September, when the pillows were squeezed, the only oil evident was a slight stain on the hand.

After September 1985, no oil has been evident in the Western Parcel well. Each time the pillows were checked only clean water had been captured.

The pillows used were Ergon Sorbents, type ElOP (8" dia. x 18" Lg.) manufactured by Ergon Oil and Chemical Sorbents. Although the fibres of the pillow are intended to repel water, water does become entrained between the fibres. This has been evident by observation of the pillows since early/mid 1985. Hence, until the discoloration caused by oil ceased, it was difficult to differentiate between amounts of water and oil trapped by the pillow. Up to that point, we had assured the total weight was oil, although later evidence dispelled this.

Samples were taken from the sewer outlets uncovered when Conrail were working on the road crossing on October 16, 1985 were analysed and a PCS count of less than 9 PPM recorded.

The site has not been in use for some years. During the Clean-up operation (Phase I) carried out in 1985, there were no oil spills on the property. Also tank foundations were inspected as each tank was demolished and there was no evidence of leakage into the ground. The contamination of the ground must have been at a peak around 1978-1981, when operations ceased at the site. The survey conducted in 1981 would have registered the full extent of ground and groundwater contamination.

We therefore consider that most of the site has been cleared of contamination.

Following results of a survey carried out in the fall of 1984, samples taken from underground tank Tl identified on the Site Closure Plan dated 10/5/81, showed a PCB count of 874 PPM. The surrounding groundsoil and surface water samples taken at that time all had low PCB levels, the highest being 69 PPM from the sample of soiladjacent to the tank. The tank contents were drained at that time. It is proposed that the site investigation to be carried out in the spring of 1986, cover the following-

- (a) A geophysical survey to confirm the number and size of underground tanks number T1, T2, identified on the Site Closure Plan dated 10/5/81.
- (b) Excavation of test pits using a backhoe around T1, T2 to establish the areal extent and depth of any oil contamination around the tanks if contamination is found then samples will be analysed for PCB's.

- (c) Further investigations would be carried out when the tanks are excavated and removed.
- (d) Sampling and analysis of groundwater from the drawdown wells, and surface water. Also the sewer collection pit placed in the summer of 1985 will be sampled and analysed.
- (e) Continual monitoring of drawdowr wells unit final site closure.

Phase 3

Phase 3 is dependent upon the results obtained from Phase 2.

Phase 4

Tank 60 will be emptied before April 1986 and the tank will be removed from the site before the end of 1986.

Very truly yours,

David Peel

Director of Operations

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- 1 212 / 12 D' 21 - 212

Booth Oil Co. 02-8710-91

BOOTH DIL CO.

Lat: 43°01'58"N Long: 78°52'37"W

Data List of Dataset: MYBY Number of Records = 6

| REC | #÷ | į | POP | j | HOUSE | l | DISTANCE | ! | SECTOR |
|-----|-----|---|--------------|----|---------------------|-------|----------|---|--------|
| | ì | l | 2097 | i | 321 5 805 | 10.0 | 0.400000 | 1 | |
| | 5 | Ť | 5,920 3823 | i | 2365 1560 | 10.5 | 0.810000 | } | 3. |
| | 3 | i | 13,174 7254 | Ì | 5113 2748 | į l | 1.60000 | 1 | 3. |
| | 4 | i | 43127 29953 | | | i 2 | 3.20000 | ì | 1 |
| | ::; | ; | 71,650 28523 | 13 | 2 5,608 9783 | 13 | 4.80000 | İ | 1 |
| | 6 | ; | 14,502 42852 | j | 40,817 15209 | i 4 | 6.40000 | Ĭ | ì. |

IJ

PAUL & POESSENDEF

NTAGARA COUNTY

HEALTH DEPARTMENT HUMAN RESOURCES BUILDING MAIN POST OFFICE BOX 428 10th AND EAST FALLS STREET NIAGARA FALLS, NEW YORK 14302

March 29, 1982

Mr. George T. Booth, III President Booth Oil Co., Inc. 76 Robinson Street North Tonawanda, NY 14120

RE: ROBINSON STREET STORM SEWER
OIL CLEANUP - BOOM REPLACEMENT

Dear Mr. Booth:

Investigation by Department personnel this past week, has indicated that a considerable quantity of oil exists in the Robinson Street storm sewer. In addition, the boom located at the Robinson Street storm sewer outfall into the Niagara River has been severely damaged by River ice. In accordance with the Closure Plan for your Robinson Road Site, this storm sewer is to be maintained to prevent oil from entering into the Niagara River. Therefore, the department requests that all oily material be removed from the Robinson Street storm sewer by April 5, 1982 and properly disposed of in accordance with existing regulations. The existing boom is to be repaired, as best possible, at this time with absorbant pads placed at the outfall area. Once the ice flow has ceased in the River, a new boom is to be placed at the outfall area.

Please feel free to call us if you have any questions concerning this matter.

Yours very truly,

James J. Devald, P.E.

Sr/Public Health Engineer

JJD:dew

cc: Mr. Panl Foersch

Mr. John Beecher

0004-F

OSRIRF 10/12/87 Page 1 of 5

PRELIMINARY ASSESSMENT OFF SITE RECONNAISSANCE INFORMATION REPORTING FORM

| Date: Nov. 9 1987 | |
|--|-----------------------------------|
| Site Name: Booth Oil Co. | TDD: 02-8710-91 |
| Site Address: 76 Robinson St. Street, Box, etc. Morth Tonowanda | |
| Town Lingara County | |
| New York State | |
| NUS Personnel: Name Bob Nies III and Donna Restivo | Discipline Geologist Toxicologist |
| | |
| Weather Conditions (clear, cloudy, rain, snow, etc.) | c.): |
| Estimated wind direction and wind speed: | 5mph |
| Estimated temperature: 40-45°F | |
| Signature: Donna J. Rostivo | Date: 1/9/87 |
| Countersigned: Killer 9-1 | Date: 11/4/87 |
| | |

PRELIMINARY ASSESSMENT

INFORMATION REPORTING FORM

| Date: November 4 1487 |
|--|
| Site Name: <u>Booth Oil Co.</u> TDD: <u>02-8710-91</u> |
| Site Sketch: |
| Provide locations from which photos are taken. |
| - RR tracks |
| |
| |
| DR trocks |
| PR trocks |
| TO LOCK & RON -> |
| S. T. Trocks |
| The debris |
| (1000/6) |
| |
| old gas Garacee XXXX |
| 4 fi high |
| Signature: 1 Donnal. Restivo Date: 11/987 |
| Countersigned: Lovel 96 Min Date: 11/9/17 |

PRELIMINARY ASSESSMENT

INFORMATION REPORTING FORM

| Date: Nov. 9, 1987 |
|--|
| Site Name: <u>Bookh Oil Co.</u> TDD: <u>02-8710-91</u> |
| Notes (Periodically indicate time of entries in military time): 1250-Arrive at what we believe is the site of Rooth Oil Co. Site is abandoned with two garages (one 4-car & one 1-car). It is in an indistrial area with a residential area aliacent to it. There are many railroad tracks surronding thesile. There are trucks on site that appear to belong thawless Container Co. which is across the street. No surface unter in immediate vicitity, therefore, no migration route appears possible. There is a playground north of the site. Sewers were not observed in the area. |
| Signature: Date: 11/9/87 Countersignature: Librid Date: 11/9/87 |

"Robinson Street Closure Plan: Drawdown Well System Evaluation Report"

prepared for:
Booth Oil Co., Inc.

submitted by:

Waste Resource Associates, Inc.

November 30, 1982

Introduction

This evaluation of the drawdown well system installed at Robinson Street is submitted in compliance with the requirements of the Order On Consent File No. 82-10, dated February 3, 1982 and, more particularly, the Final Closure Plan dated November 24, 1981, Addendum I thereto, dated January 14, 1982 and the Anticipated Closure Schedule contained on said Plan, all of which are incorporated by reference in the Order On Consent. It is also submitted in response to the issues (exclusive of Part 360 Storage Permit for Tank 60) identified in correspondance of September 16, 1982 and October 7, 1982 received from the department.

System Evaluation

The system has operated reasonably well other than experiencing various minor mechanical and electrical malfunctions which temporarily halted pumping activity. A major impediment to the system's effective operation has been a low water table elevation in the eastern well which has thus far, resulted in less pumping and, therefore, oil recovery than was anticipated. The western well however, with the clay sub-strata being located at a greater depth, has had sufficient liquid levels to allow for more effective operation. The oil recovery operating data is as follows:

Oil Recovery (gallons)

| Month | Western Parcel | Eastern Parcel | Total | Gallons/day |
|-----------|-------------------|-------------------|-------|-------------|
| July | 482 | | 482 | 15.5 |
| August | 430 | 12 | 442 | 14.3 |
| September | 288 | 17 | 305 | 10.3 |
| October | 318 | | 318 | 10.3 |
| | 1,518 | 29 | 1,547 | |

It is proposed to terminate further use of the probe scavenger in the drawdown well on the eastern parcel until sometime during the early Spring when the water table is at its seasonally high level and the drawdown well can perform more effectively. In the interim, a device called a "Filter-Bucket" will be placed in the drawdown well to effect oil withdrawal. Once filled, it will be removed manually and emptied into a 55-gallon drum. The device is described more fully in Appendix I.

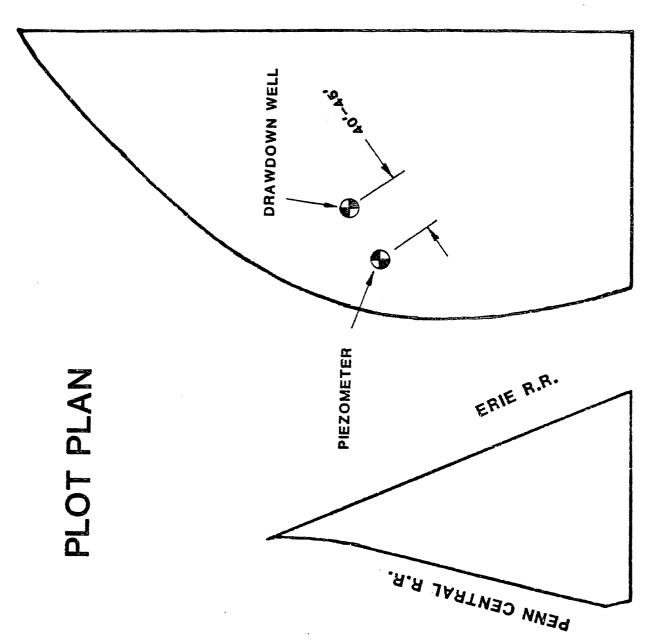
The western well will continue to be operated through the course of the winter unless drastic weather conditions and extremely low temperatures dictate shutdown of the system.

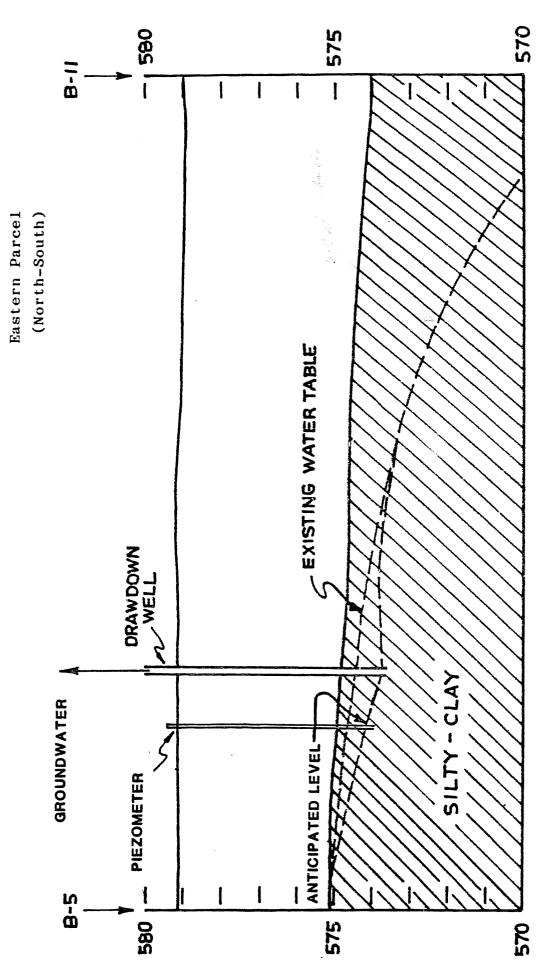
The analysis of the groundwater being discharged to the sewer from the drawdown well system is presented in Appendix II.

Lagoon: Hydraulic Communication

In performing closure of the lagoon area, it was desired to establish some form of lateral hydraulic communication between the lagoon area and the drawdown well on the eastern parcel. This hydraulic communication was provided by digging a trench using a backhoe which began near the northeastern corner of the lagoon and proceeded in an easternly direction toward the drawdown well. The trench was terminated before it reached the drawdown well when granular material of sufficient depth was encountered. The open portion of the trench was backfilled with crushed stone and covered over with soil.

In order to verify the presence of hydraulic communication between the closed lagoon area and the eastern drawdown well, a pump test is proposed when operation of the eastern drawdown well is resumed in the early Spring. A piezometer such as that described in the sketch in Appendix III will be placed near the northern end of the closed lagoon area. Prior to initiating any pumping of the drawdown well on the eastern parcel, the water level in both the piezometer and the drawdown well will be measured. Pumping of the groundwater in the eastern drawdown well will then commence and the water level in the piezometer will be continually measured. Any significant deflection in the water level in the piezometer (significant: drop of 2" or more) will be taken as evidence of hydraulic communication existing between the closed lagoon area and the eastern drawdown well.





Draw-down Well/Geologic Cross-section

Lagoon: Stability of Final Cover

Throughout the late Winter and early Spring when snowmelt and freeze/thaw conditions are most prevalent, surface condition of the final cover will be periodically inspected for sloughing and/or outcroppings of sludge material. If sloughing or outcropping of sludge occurs, the department will be notified and an appropriate remedial action plan devised.

Underground Storage Tanks

The underground storage tanks located on the eastern side of the property have been emptied and refilled with water to prevent the tanks from "floating" during times of high water table during the upcoming Spring.

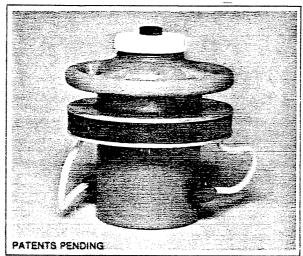
APPENDIX I

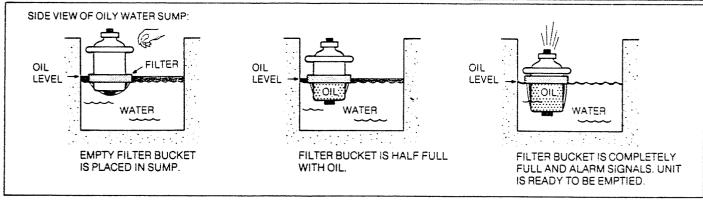
The Filter-Bucket™

is a manual, passive system for separating light hydrocarbons from water.

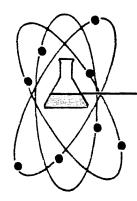
The Filter-Bucket uses the same filter cartridge technology that is used on the Filter Scavenger, and has the same separation capabilities.

It can be deployed in any area that is 10 inches in diameter or larger. The capacity is approximately 2 liters. When it is full the unit signals, indicating that it should be manually emptied. The Filter-Bucket is especially useful for small quantities of hydrocarbons in groundwater wells, industrial sumps, settling ponds, etc.





APPENDIX II



ACTS TESTING LABS, INC.

3900 Broadway • Buffalo, N.Y. 14227-1192 • (716) 684-3300

TECHNICAL REPORT

November 1, 1982

Mr. George Booth BOOTH OIL COMPANY, INCORPORATED

SUBJECT:

Analysis of one water sample received on October 22, 1982.

RESULTS:

pH Units 6.63

Specific Conductivity 5,400 micromhos/centimeter
Oil & Grease 20.5 mg/l

Total Organic Carbon 35.0 mg/l

LT 0.1

mg/l = milligrams per liter.
LT = Less Than

Lead

EXPERIMENTAL:

All analyses were conducted according to procedures listed in "Standard Methods for the Examination of Water and Wastewater", 15th Edition, 1980.

ACTS TESTING LABS, INC.

Thomas Kruperbooker

ACTS TESTING LABS, INC.

Thomas Knickerbocker
Environmental Laboratory
Coordinator

Daniel P. Murtha, Ph.D. Laboratory Director

Daniel P. Muty



