

RB

ENVIRONMENTAL OIL, INC.

P.O. Box 315 Syracuse, New York 13209 (315) 471-0503

August 20, 1987

Safety Kleen Corporation
777 Big Timber Road
Elgin, Illinois 60120

Attention: Mr. Daniel Dowling

Dear Mr. Dowling:

Please find the attached revised copy of the wipe test analysis for the Safety Kleen facility located in Niagara Falls. As stated in the enclosed cover letter, these results are actually in units of micrograms/100 square centimeters and not in milligrams/100 square centimeters as reported earlier.

We apologize for the inconvenience. Should you have any questions, please contact me at your convenience.

Very truly yours,

ENVIRONMENTAL OIL, INC.

James S. Smith
Project Coordinator

JSS/dcd

cc: Richard Baker, NYS/DEC
Keith Wishmeier, Wishmeier and Associates

ACTS TESTING LABS, INC.

3916 Broadway • Buffalo, N.Y. 14227-1192 • (716) 684-3300
120 West 41st Street • New York, N.Y. 10036 • (212) 302-6780

August 13, 1987

Mr. James S. Smith
Project Coordinator
ENVIRONMENTAL OIL

Re: Technical Report 7-1354C
Sampling and analysis at the former Safety-Kleen
Building, 720 Niagara Falls Blvd., Niagara Falls, N.Y.

Dear Mr. Smith:

Enclosed is Technical Report 7-1354C (Revised) with the correction from milligrams/100 square centimeters to micrograms/100 square centimeters, per our telephone conversation on Tuesday, August 11. I'm very sorry for the inconvenience this caused you. We are so used to reporting in milligrams per liter or kilogram that the typo error passed right by me (our worksheet calculations are micrograms). Also, I reviewed the data and G.C. scans, and probably could lower the values by about 1/4 to 1/3 if I was pushed.

Again, I apologize for the mistake. If you have any questions please feel free to call me.

Very truly yours,

ACTS TESTING LABS, INC.



Elmer K. Gerbracht
Technical Director

EKG/sms

ENC.

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120 W. 41st St., 3rd Floor • New York, N.Y. 10036 • (212) 302-6780

TECHNICAL REPORT 7-1354C (REVISED)

August 12, 1987

Mr. James S. Smith
Project Coordinator
ENVIRONMENTAL OIL, INC.

OBJECT:

Collection and analysis of three samples for presence of Mineral Spirits and Chlorinated Hydrocarbon Solvents.

The samples were collected on May 12, 1987 at 9:30 am, by ACTS Testing Labs personnel. The areas sampled were Bay 1, 2, and 3 in the former Safety-Kleen building, 720 Niagara Falls Blvd., Niagara Falls, New York. A sketch of the building and sampling areas is attached.

RESULTS:

<u>Sample Identificaiton</u>	<u>Mineral Spirits</u>	<u>Chlorinated Hydrocarbons Solvents</u>	
		<i>mg/100 cm²</i>	<i>mg/100 cm²</i>
Bay #1	LT 86	.09	LT 93 .09
Bay #2	LT 165	.16	LT 58 .06
Bay #3	LT 110	.11	LT 176 .18

LT = Less Than

Results are reported in micrograms per 100 square centimeters.

EXPERIMENTAL:

The samples were collected using the United States Environmental Protection Agency (USEPA) "Wipe Test". This procedure entails wiping an area 10 cm x 10 cm in two directions (perpendicular) with a cotton swab in an appropriate solvent.

ACTS TESTING LABS, INC.

Mr. James S. Smith
Project Coordinator
ENVIRONMENTAL OIL, INC.

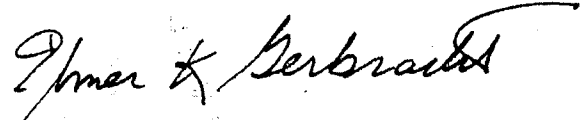
August 12, 1987
TECHNICAL REPORT 7-1354C
Page Two

EXPERIMENTAL (cont.):

The Mineral Spirits samples were collected using a known volume of Methylene Chloride as the solvent, and the Chlorinated Hydrocarbon Solvents using a known volume of Hexane as the solvent.

The collected samples were analyzed using Gas Chromatography. A Flame Ionization detector was used for the Mineral Spirits analysis, and an Electron Capture detector for the Chlorinated Hydrocarbons Solvents. The chromatograph was calibrated with known concentrations of commercially available Mineral Spirits in Methylene Chloride, and Tetrachloroethylene and Methylene Chloride in Hexane.

ACTS TESTING LABS, INC.



Elmer K. Gerbracht
Technical Director

EKG/sms

WISHMEIER & ASSOCIATES

ARCHITECTS • ENGINEERS

119 N. TAYLOR STREET • SOUTH BEND, INDIANA 46601

(219) 234-3433

September 29, 1987

New York State Dept. of Environmental Conservation
600 Delaware Avenue
Buffalo N.Y. 14202-1073
ATTN: Mr. Richard J. Baker, P.E.
Senior Sanitary Engineer

RE: Plant Closure for
Safety-Kleen Corporation
2720 Niagara Falls Blvd.
Niagara Falls, N.Y.

Dear Mr. Baker:

After carefully reading the closure plan for the Safety-Kleen facility in Niagara Falls, N.Y. USEPA ID# NYD055052443, Safety-Kleen Corporation #2-028-01, I arrived on the site on April 21, 1987 to supervise said closure through its completion. Present on the site and heading the closure operation was Mr. Jim Smith of Environmental Oil Inc. P.O. Box 315, Syracuse, N.Y. 13209. Along with Mr. Smith were two workers from Environmental Oil. My purpose was to ensure that the Safety-Kleen Closure Plan was followed in its entirety.

Clean-up of the floors proceeded smoothly. There were three floor sections needing cleaning. These are indicated on Figure 1 included with this letter. The floors were scrubbed using power hosing, detergent and brushes. Bottled samples of the clean-up water were taken from each section and delivered to the laboratory for testing. A pumper truck picked up the remaining liquid. The Wipe Test Procedure was performed later in the week. Contaminated soils collected from the floors and from the trench drains were deposited into sealed 55 gallon drums which were disposed of in accordance with the laws of the State of New York by the clean-up contractor. The need to do a proper job of cleaning the floor trenches was explained to the cleaning contractor as well as the proper clean-up method for all tools and equipment. All was completed satisfactorily.

Although the floor cleaning was finished during this site inspection, the following items were still on the site when I left that day, but were later removed by the time of my final inspection which occurred on July 17, 1987.

Interior of Building:

1. One 55 gallon drum with solvent inside.
2. One 55 gallon drum with trash inside.
3. One Safety-Kleen eyewash unit.
4. Five empty 5 gallon cans with tetrachloroethylene on the tables.
5. Five steel lockers.
6. About a dozen small misc. containers.
7. Misc. Safety-Kleen signs.

Charles Keith Wislencu
9-30-87

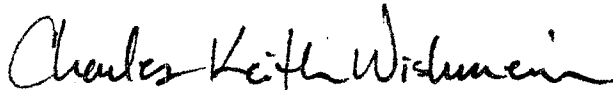
Exterior of Building:

1. One wet dumpster with dried mud inside.
2. One 4 CY waste container.
3. Sixteen empty 30 gallon drums plus one damaged 30 gallon drum.
4. Four empty 16 gallon drums.
5. One empty 55 gallon drum.
6. Two steel dock assemblies.
7. Forty parts washer lids.
8. Misc. steel pipe framework and floor grating.
9. A small pile of paint cans and other trash.

Technical reports 7-1354C and 7-1354C Revised were received from Acts Testing Labs Inc. 3916 Broadway, Buffalo, N.Y. 14227. The original technical report had an error involving units. Acts Testing Labs later submitted a revised report dated Aug. 13, 1987, which corrected the errors. A copy of the revised technical report is enclosed with this letter. We hope these results meet with your approval.

Again, it is my belief that the Safety-Kleen Closure Plan was followed successfully and the closure is complete.

Sincerely,



Charles Keith Wishmeier, P.E.
Wishmeier and Associates

cc: Safety-Kleen
file