



August 5, 2020

To: Benjamin McPherson (NYSDEC)

From: John Black (Inventum)

CC: Jon Williams (Riverview); John Yensan (OSC); Craig Slater (CS Law); Todd Waldrop, P.E., and James Edwards (Inventum)

RE: Draft Drum and Container Management Work Plan
Riverview Innovation & Technology Campus, Inc.
Brownfield Cleanup Program Site No. C915353
Town of Tonawanda, New York

Inventum Engineering, P.C. (Engineering), on behalf of Riverview Innovation & Technology Campus, Inc. (Riverview), is submitting this Drum and Container IRM Work Plan for the Riverview Brownfield Cleanup Program (BCP) Site (#C915353) located at 3875 River Road, Tonawanda, New York. This work plan has been developed to address drums and containers found to date and those drums and containers to be collected in a comprehensive building by building sweep of the site.

Drums and containers have been and are to be collected and placed in one of the storage areas on the property:

- Maintenance Shop (Building No. 4) and Adjacent Pole Building (Building No. 5)
- Oil House (Building No. 6).
- Laboratory/Electrical Department/Machine Shop (Building No. 8).
- Gray Shed (Building No. 16).
- Outside Drum Accumulation Area (Grid Q3).
- Sulfuric Acid Storage Area (Building No. 77).

Note: Fire extinguishers will be managed separately. Those that are not in service are, and are to be, accumulated within and near Building No. 14E.

The majority of the large (>20-gallon capacity) containers collected and stored to date (Table 1) are either empty (33%), Investigation Derived Waste generated by the U.S. Environmental Protection Agency (USEPA) Consultant(s) (31%), or petroleum products (14%). Twenty-four drums of coal distillation oil are being stored in the two northern storage areas. Seven drums of wastewater treatment chemicals (sulfuric acid for neutralization) are stored for future onsite use near the equalization tank (ST-22).

Ten drums of wastewater treatment residuals (sediment, sludge, and personal protective equipment [PPE]) from cleaning of the weir tank leased by the USEPA are staged for disposal in the hazardous waste storage area (within the warehouse [Building No. 18]).

Twenty unlabeled containers greater than 20-gallon capacity with contents have been located, managed, and moved to the storage areas to date.

Purpose

The purpose of this IRM is to safely identify, collect, characterize, and dispose of materials (liquid and solid) left on the Riverview property by previous owners and operators of the Site. The USEPA conducted an emergency response between October 2018 and March 2020. The USEPA consultant started an inventory of containers at the property (Weston, 2018). No record of which containers were managed and disposed is available, but when legible, the container designations used by the EPA Consultant have been carried forward.

Ontario Specialty Contracting, Inc. (OSC) on behalf of Riverview has been managing the former Tonawanda Coke Plant Site at 3875 River Road in the Town of Tonawanda, New York since the transition from the USEPA. Throughout this process, the collection and proper storage of drums and containers has been a critical aspect of ensuring the site conditions are not exacerbated by a release of petroleum or other material. The containers have been properly stored, stacked drums have been moved to the slab or ground surface, This IRM Work Plan has been prepared for the proper management, use, recycling and disposal of the contents and containers at the site. Rather than continue to manage containers as they are discovered, a systematic building by building sweep will be conducted. The containers collected during the building sweep will be organized and inventoried with the containers found to date.

This IRM Work Plan will be followed to address the containers found to date and that will be collected during a comprehensive building sweep. The containers of greater than 20-gallons , one+ to five-gallon containers, and smaller containers in accordance with the protocols and criteria listed below. As other containers are identified and managed throughout the site maintenance, preparation for the investigation, decontamination, demolition, abatement, and remedial actions they will also be managed in accordance with the protocols and criteria listed below.

Scope of Work

The scope of work has been divided into the Building Sweep and Container Management.

Building Sweep

The building sweep is a systematic building by building collection of containers of materials and empty containers. The building sweep will consist of an inspection of all buildings at the site to remove containers that did, may or still contain liquid or solid products used at the former operating facility. The containers will be located, identified (labels and locations will be documented), collected and sorted in one of the container management areas:

- Containers greater than 20 gallons:
 - Coal Distillate Oil
 - Wastewater Treatment Chemicals (inc. Sulfuric Acid)
 - Petroleum Products
 - Investigation Derived Wastes (IDWs)
 - Wastewater Treatment Residuals



- Unknown or Poorly Labeled
- Pressurized/Formerly Pressurized Gas Bottles
- One+- to Five-Gallon Containers:
 - Paint
 - Coke Oven Coating and Lid Seal Materials
 - Mortar
 - Petroleum Products
 - Fuels (although petroleum, they are managed separately due to their flammability)
 - Adhesives
 - Solvents
 - Herbicides
 - Unknown
 - Empty
- Compressed Gas Cylinders
- Aerosols, One gallon and Smaller Containers
 - Paint
 - Petroleum Products
 - Laboratory/Testing Chemicals
 - Calibration Gases
 - Aerosol Containers
 - Unknown
 - Empty
- Fire Extinguishers
- Bagged Products

Damaged, rusted drums or containers may require either an overpack container or the liquid/contents to be transferred to a competent drum, prior to relocation to the staging area.

The sweep will not include hazardous materials/universal wastes and other materials not suitable as C&D such as light bulbs, light ballasts, mercury switches, thermometers, thermostats, air conditioners¹, or batteries. Hazardous Materials (HazMat's)/Universal wastes will be removed prior to demolition, the majority are to be removed during the asbestos abatement activities.

The drums previously staged for accumulation/collection and storage of oil booms and other absorbent materials will remain at the staged locations. The sulfuric acid in the water treatment area will remain in the acid storage area (Building No. 77) for use in future onsite treatment.

The caustic that was identified in the east end of the boiler house on the floor and equipment will be removed prior to ACM abatement preparation activities. These materials will be removed by hand or with vacuum equipment. This is being done prior to the pre-asbestos building clearing and before any general wash/dust control water in this area of the boiler house (Building No. 43) to prevent the

¹ Air conditioners from windows will be removed by the abatement contractor but will be transferred to OSC for management of the refrigerant. Roof top air conditioners will be removed by OSC prior to demolition.



materials from being washed into a building drain. The accumulated material will be placed in a 55-gallon drum and included in the inventory.

Container Management

A total of 261 containers of 20 gallon or greater capacity have been collected² at this site (Table 1) to date. Of these 86, slightly less than one-third, are empty (Table 2). The remaining 174 drums and containers of more than 20-gallon capacity (Tables 3 to 8) have been divided into 6 separate categories:

1. Coal Distillate Oil – 24 containers
2. Sulfuric Acid – 7 Containers
3. Petroleum Products – 33 Containers
4. Investigation Derived Wastes (IDWs) from the USEPA Consultants – 81 Containers
5. Wastewater Treatment Residuals from the Cleaning of the Rental Water Treatment Unit – 10 Containers
6. Unknown or Poorly Labeled – 20 Containers

In addition to the containers that have a volume of 20-gallons or more, there are one+- to 5-gallon “buckets” throughout the site, aerosol containers, and miscellaneous small containers. These will be managed as defined below.

Each category of container will be managed in accordance with the characteristics of its content:

Empty Containers

Empty containers (Table 2) of more than 20-gallons are defined as follows:

1. All liquid/solid has been removed that can be removed by pouring, pumping, or by means of suction; *and*
2. No more than 1 inch (in.), equivalent to 2.5 centimeters, of residue remains on the bottom of the container or inner liner (commonly referred to as the "one-inch rule"); *or*
3. No more than 3 percent by weight of total capacity (e.g. less than 12 pounds in a 55 gallon drum) of the container remains in the container or inner liner if the container is less than or equal to 119 gallons (gal) in size; *or*
4. No more than 0.3 percent by weight of the total capacity of the container remains in the container or inner liner if the container is greater than 119 gal in size.

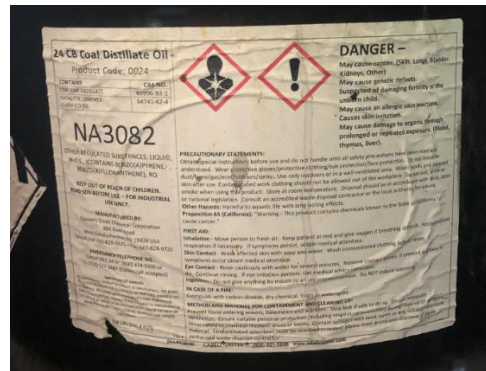
Empty closed top (bung configuration) containers will be crushed and transported offsite for recycling (Steel) or disposal (polycarbonate). Empty and used (empty but potentially not clean) open top drums will be crushed for offsite recycling. Empty and clean (no visible liquid or solids) open top drums will be staged for use during the RI for IDW.

Coal Distillate Oil – 24 Containers

The coal distillate oil (Table 3) in 55-gallon containers were purchased from Coopers Creek Chemical Corporation, 884 River Road, West Conshohocken, Pennsylvania. The product contains Coal Tar Distillate (CAS No. 65996-92-1) and Catalytic Cracked Clarified Oil (CAS No. 64741-62-4). The liquid contains benzo(a)pyrene and benzo(b)fluoranthene.

² The inventory does not include the 55-gallon drums staged throughout the property by the USEPA for collection and storage of oil socks and other absorbent materials. Those containers will be managed in accordance with their use and content.





Coopers Creek will be contacted to recover their product. If Coopers Creek is not able to reclaim and reuse/recycle the product a composite sample will be collected from the containers and it will be tested in accordance with the waste profile protocol and disposed in accordance with its properties.

Sulfuric Acid – 7 Containers

Seven 55-gallon drums of sulfuric acid (Table 4) purchased during the emergency response for treatment of the liquids in the wastewater treatment tanks (ST-21 and ST-22) prior to discharge to the Town of Tonawanda Sewer system under the then current Industrial Discharge Permit are stored in the water treatment AOI. The drums will continue to be properly stored near ST-22 and the materials will be used for their intended purpose when the wastewater treatment tanks are emptied and decontaminated.

Petroleum Products – 33 Containers

There has been 33 containers of petroleum products identified at the site (Table 5).

The containers will be sorted as listed on Table 5 and composite samples will be collected from the following categories:

- Antifreeze
- Fuel Treatment & Diesel
- Gear Oil
- Houghton Products
- Hydraulic Oil
- NOCO Lubricants
- Waste Oil (Composite with Waste Oil Containers on Table 8)

A composite sample from each category will be collected and analyzed for waste profile parameters. In addition, the NOCO containers will be sampled and tested by NOCO in accordance with their permit for recovery and recycling of petroleum products. All contained liquids that meet the NOCO acceptance criteria will be emptied by NOCO and recycled.

Following receipt of the analyses, waste profiles will be prepared for any materials that cannot be reused or recycled, and the materials will be scheduled for transportation and offsite disposal. The DEC will be given no less than 5 days' notice before materials are shipped from the site.



The empty containers remaining after the contents are recycled or reused materials will be crushed and recycled with the other empty containers.

Investigation Derived Wastes from the USEPA Consultants – 81 Containers

There are 81 containers of IDW (Table 6) that remain from sampling efforts conducted by the USEPA during the emergency response. The samples were collected from soils and other materials within the former production area, an area roughly defined by grids G2 to U7 (Weston, 2019). The associated soils samples have been tested and the data are presented in Appendix A. The data were compared to the USEPA Removal Management Levels (RMLs) and the NYSDEC Unrestricted Use Soil Cleanup Levels. Unrestricted Use is not a goal for this property.

Also please note that there is a transcription error in the Tables showing the Maximum Concentration of Contaminant (Tables 3E and 9E) for metals. The data are reported by the laboratory in micrograms per liter (ug/L), not milligrams per liter (mg/L) as shown in the Tables. None of the samples exhibit the characteristic of toxicity for metals as suggested by the highlights and footnote of the Weston Report. Sample WS015-01 that was taken from within a section of coke oven gas piping near the west flare contained 3.8 mg/L Benzene in the TCLP leachate and would be classified D018. Samples WS011-01 and WS012-01 were collected from within the tar management area. Neither was tested for hazardous characteristics but contained elevated concentrations of SVOCs.

Seven of the 17 samples (Weston, 2019) contained one or more compounds associated with the production of coke and coke by-products, several compounds above the RMLs; Benzene, SVOCs (most notably Naphthalene), Lead, Mercury, and Cyanide. There is no means of differentiating the drums and as a result, all will be considered to exceed the DEC industrial soil cleanup standards and all soil like materials will be consolidated in one or more roll off containers, sampled for disposal profile purposes (one composite per 20 tons) and transported offsite for disposal in accordance with the sampling results. The landfill will be provided with both the profile composite sample results and the laboratory reports associated with the Appendix A USEPA results.

Any sludge or tar like materials will be retained in the drums in which they are currently contained. Those drums will be segregated from soil like materials, labeled/identified, and the materials will be sampled, analyzed for the characteristics of hazardous waste, and disposed separately from the soil like materials.

Wastewater Treatment Residuals from the Cleaning of the Rental Water Treatment Unit – 10 Containers

A rental, nominal 18,000 gallon, weir tank was used by the USEPA and OSC to treat the water from the secondary containment in the tar management area prior to discharge to the POTW under the then current and renewed Permit No. 331 with the Town of Tonawanda. Following the transition from the USEPA to Riverview, OSC mobilized two of their own nominal 18,000-gallon fractionation tanks to the site. Prior to returning the rental tank, the water treatment residuals were cleaned from the rental tank. The water treatment residuals and associated PPE were stored in drums in the warehouse (Building No. 18) adjacent to the newly installed fractionation tank. The drums were labeled “Non-hazardous, Pending Analysis” and dated, the labels have been replaced with Hazardous Waste Labels and dated.



Samples were collected for analysis on May 12, 2020 and the results are included in Appendix B. The TCLP extract from the sample contained 1,120 ug/L benzene, above the concentration of 500 ug/L that defines a material as characteristically hazardous as D018. A waste profile has been prepared and the material will be disposed by Clean Harbors in late July or early August 2020. A manifest and disposal record will be maintained and included in the Construction Completion Report.

Unknown – 20 Containers

The 20 containers of unknown materials (Table 8) will be characterized as shown in the table. Several contain materials that can be grouped by their visual and olfactory characteristics such as; waste oil and spent antifreeze. The remaining containers have been inspected for additional markings. The containers have been grouped into 7 categories:

- Trash and Cleaning Residuals
- NOCO lubricants
- Hydraulic Fluids
- Houghton Products
- Beacon Lubricant Products
- Waste Oil
- Waste Drum and Tote

Should a difference within containers included in a grouping be noted at the time of sampling, additional samples will be collected, and the container will be segregated.

Images of the containers are provided in Appendix C. The containers will be managed as follows:

1. Trash and Cleaning Residuals - Containers B5, B6 and B7 (Photograph C-1) contain approximately 165 gallons of cleaning wastes and trash. A single composite of the three drums will be collected, visually documented, screened with a PiD, and submitted to the analytic laboratory and tested for waste profile characteristics.
2. NOCO Lubricants - Containers 063 (Photograph C-2) and 076 (Photograph C-7) contain approximately 28 gallons of a petroleum like liquid and the containers appear to be NOCO lubricants. A single composite of the two drums will be collected, visually documented, screened with a PiD, and submitted to the analytic laboratory and tested for waste profile characteristics.
3. Hydraulic Fluid - Containers 043 (Photograph C-3), 067 and 032 (Photograph C-6) and X-18 (Photograph C-10) contain approximately 138 gallons of a petroleum like liquid that appears to be similar hydraulic fluid. A single composite of the four drums will be collected, visually documented, screened with a PiD, and submitted to the analytic laboratory and tested for waste profile characteristics.
4. Houghton Products - Containers 039 (Photograph C-5), SRT4 (Photograph C-12) and SRT5 (Photograph C-13) contain approximately 500 gallons of a glycol based hydraulic fluid or waste oil (based on the USEPA identification). The glycol based hydraulic fluid may have appeared similar to anti-freeze to the contractor. A single composite of the three containers will be collected, visually documented, screened with a PiD, and submitted to the analytic laboratory and tested for waste profile characteristics.



5. Beacon Lubricants Products - Containers X12 (Photograph C-8), X17 (Photograph C-9) and X-19 (Photograph C-10) contain approximately 140 gallons of a petroleum like liquid and the containers appear to be from Beacon. A single composite of the three drums will be collected, visually documented, screened with a PiD, and submitted to the analytic laboratory and tested for waste profile characteristics.
6. Waste Oil - Containers RT3 (Photograph C-11) and SRT6 (Photograph C-14) contain approximately 390 gallons of waste oil like liquid. A single composite of the two containers will be collected, visually documented, screened with a PiD, and submitted to the analytic laboratory and tested for waste profile characteristics.
7. Waste - Drum 121 and tote T004 do not have a similar characteristic to the other 6 categories. This drum and tote will each be sampled individually.

One+ to Five-Gallon Containers

There are containers of over one- to five-gallon throughout the facility. Many contain products and are labeled, such as the pallets of 5-gallon mortar south of the shower building (proposed for Stage 2 Surface Management IRM removal). Other containers are sealed with legible labels. A greater number of the mid-size containers are empty or filled with trash. A limited number of mid-size containers contain unidentified products or wastes. The containers will be handled as follows:

1. Labeled products will be returned to their manufacturers for reuse or recycling or disposed in accordance with the Safety Data Sheets (SDS).
2. Empty (as defined above) containers and containers used as trash collection receptacles will be disposed with the trash.
3. Containers containing liquids will be accumulated in the maintenance shop and pole building (Buildings No. 4 and 5) and the Machine Shop (Building No. 8). The containers will be characterized in accordance with the labeling and included in lab packs of similar materials based on labels.

Gas Bottles/Cylinders

There have been few gas bottles/cylinders identified at the property. Those that have been found are oxygen, acetylene, and calibration gases. The cutting gasses will be used during the demolition. The calibration gasses will be returned to their suppliers.

Aerosols, One-gallon Containers, and Small Containers

One-gallon containers, primarily paints, aerosol cans, and small containers of laboratory chemicals have been identified throughout the facility.

- Empty (empty vs clean) open-top containers will be crushed and shipped off site for disposal as trash.
- One gallon and smaller containers with liquid or solid contents will be properly lab packed in drums and shipped for proper disposal.
- Aerosol containers will be sorted by content and lab packed for proper disposal.
- Laboratory chemicals will be sorted by content and lab packed for proper disposal.



Bagged Products

Various products for use on the property or that had been packaged for sale have been identified. These include asphalt patch, water treatment chemicals (water treatment softener salts), coke breeze, and other products used in the coke battery. The materials will be managed as follows:

- Asphalt Patch – Used to fill potholes on the property.
- Water softener salts – dispose as C&D.
- Coke Breeze – Return to coke yard.
- Unknown – Group by location found, characterize, and properly dispose.

Sample Protocols

A minimum of twenty samples of liquids and solids in containers will be collected as outlined above and as summarized below:

<u>Category</u>	<u>Minimum Number of Samples</u>
• Coal Distillation Oil	- One Composite Sample
• Sulfuric Acid	- Not Applicable
• Petroleum Products	- Eight Composite Samples
• IDW	- Two Composite Samples
• Wastewater Treatment Residuals	- One Composite Sample (Collected)
• “Unknown” Containers	
○ Trash and Cleanup Materials	- One Composite Sample
○ NOCO Lubricants	- One Composite Sample
○ Hydraulic Fluid	- One Composite Sample
○ Houghton Products	- One or two ³ Composite Sample(s)
○ Beacon Lubricants Products	- One Composite Sample
○ Waste Oil	- Composite with Table 5 Waste Oil
○ Waste Drum	- One Composite Sample
○ Solids Tote	- One Composite Sample

The CAMP will include an air monitoring station downwind of the area during drum sampling. The station will be positioned mid-way between the containers being sampled and the closest property line, but in no case more than 50 feet from the sampling.

Prior to opening any closed container, the walls and top of the container will be inspected for damage, corrosion, or bulging. The air space around and above the container will be screened with a PiD. Each container will be opened and the air space above the contents will be screened with a PiD. Solid samples will be collected using stainless steel spoons or other pre-cleaned utensils capable of collecting samples to a depth of no less than 12-inches in each container. A portion of the solid sample will be placed in zip lock bags and sealed for additional field screening. The solid samples will be mixed in a pre-cleaned stainless steel bowl to ensure uniform samples are placed in each laboratory container.

³ Any Houghton drum found to have waste oil will be grouped and composited with the waste oil containers.



Liquid samples will be collected with a 42-inch long (nominal) new high-density polyethylene “drum thief” type bailer that allows visual identification of any stratification in the container. The laboratory containers will be filled directly with the bailer.

- Solids - Characterization
 - Toxicity Characteristic Leaching Procedure (TCLP) using EPA Method 1311 for:
 - Semi-Volatile Organic Compounds (SVOCs) using EPA Method 8270D
 - VOCs using EPA Method 8260C
 - Resource Conservation and Recovery Act (RCRA) Metals using EPA Method 6010C
 - Mercury using EPA Method 7470A
 - Pesticides using EPA Method 8081B
 - Herbicides using EPA Method 8151A
 - Polychlorinated Biphenyls (PCBs) using EPA Method 8082A
 - Flash Point using EPA Method 1010A
 - pH using EPA Method 9045D Reactivity, Cyanide using EPA Method 7.3.4.2 reference
 - Reactivity, Sulfide using EPA Method 7.3.4.3 reference
 - Target Compound List (TCL) VOCs using EPA Method 8260C
 - TCL SVOCs using EPA Method 8270D
- Liquids - Characterization
 - TCL SVOCs using EPA Method 8270D
 - TCL VOCs using EPA Method 8260C
 - Resource Conservation and Recovery Act (RCRA) Metals using EPA Method 6010C
 - Mercury using EPA Method 7470A
 - Pesticides using EPA Method 8081B
 - Herbicides using EPA Method 8151A
 - Polychlorinated Biphenyls (PCBs) using EPA Method 8082A
 - Flash Point using EPA Method 1010A
 - pH using EPA Method 9045D
 - Reactivity, Cyanide using EPA Method 7.3.4.2 reference
 - Reactivity, Sulfide using EPA Method 7.3.4.3 reference

Inspection and Disposal

As the containers are prepared for transportation and disposal they will be segregated and labeled, as follows:

1. Empty plastic or polycarbonate containers to be disposed with C&D Materials;
2. Empty metal containers to be recycled as scrap metal;
3. Products to be recycled or reused offsite;
4. Products to be used for their intended purpose onsite;
5. Wastes to be disposed offsite as non-hazardous liquids, by category and sample composition;
6. Wastes to be disposed offsite and non-hazardous solids, by category and sample composition;
and
7. Wastes to be disposed offsite as hazardous waste.



No less than 5 days before transportation, the DEC will be notified of the disposition of containers and their contents. Following shipping the manifest and shipping forms will be properly filed.

Any waste determined to exhibit the characteristics of hazardous waste will be, labeled, moved to the 90-day container storage area in Building No. 18, inspected daily and disposed offsite in accordance with an approved waste profile.



References

1. Weston, 2018, Container Inventory Report, Tonawanda Coke Site, Tonawanda, Erie County, New York, Prepared for the US EPA, Region II, October 30.
2. Weston, 2019, Removal Assessment Sampling Report, Tonawanda Coke Site, Tonawanda, Erie County, New York, Prepared for the US EPA, Region II, August 26.



Tables



Table 1
 Summary
 Containers > 20 Gallon Capacity
 Drum and Container IRM
 Riverview Innovation Technology Campus, Inc.
 Tonawanda, New York

Container ID	Building/Location	Building No.	Container Type	Content	Size	Estimated Current Volume	Units	Date of Disposition (See Note 1)
D009	Round House	5	Steel	Empty	55 Gallons	0	Gallons	
D010	Round House	5	Steel	Coal Distillation Oil	55 Gallons	13.75	Gallons	
D012	Round House	5	Steel	Coal Distillation Oil	55 Gallons	13.75	Gallons	
D011	Round House	5	Steel	Coal Distillation Oil	55 Gallons	27.5	Gallons	
070	Round House	5	Steel	Houghto Safe 620	55 Gallons	13.75	Gallons	
D013	Round House	5	Steel	Empty	55 Gallons	0	Gallons	
D014	Round House	5	Steel	Empty	55 Gallons	0	Gallons	
D015	Round House	5	Steel	Empty	55 Gallons	0	Gallons	
X1	Round House	5	Steel	Empty	55 Gallons	0	Gallons	
063	Round House	5	Steel	Contents Unknown	55 Gallons	13.75	Gallons	
043	Round House	5	Steel	Contents Unknown	55 Gallons	13.75	Gallons	
X2	Round House	5	Steel	Empty	55 Gallons	0	Gallons	
044	Round House	5	Steel	Empty	55 Gallons	0	Gallons	
062	Round House	5	Steel	Transmission Fluid	55 Gallons	13.75	Gallons	
069	Round House	5	Steel	Turbine T68	55 Gallons	13.75	Gallons	
045	Round House	5	Steel	Noco CS4 HD	55 Gallons	27.5	Gallons	
X4	Round House	5	Steel	Empty	55 Gallons	0	Gallons	
X5	Round House	5	Steel	Empty	55 Gallons	0	Gallons	
060	Round House	5	Steel	Contents Unknown	55 Gallons	13.75	Gallons	
X6	Round House	5	Steel	Fuel Treatment	55 Gallons	27.5	Gallons	
039	Round House	5	Steel	Contents Unknown	55 Gallons	27.5	Gallons	
048	Round House	5	Steel	Fuel Treatment	55 Gallons	27.5	Gallons	
067	Round House	5	Steel	Contents Unknown	55 Gallons	13.75	Gallons	
031	Round House	5	Steel	Empty	55 Gallons	0	Gallons	
038	Round House	5	Steel	Houghto Safe 620	55 Gallons	27.5	Gallons	
X7	Round House	5	Steel	Empty	55 Gallons	0	Gallons	
026	Round House	5	Steel	Coal Distillation Oil	55 Gallons	18.15	Gallons	
025	Round House	5	Steel	Coal Distillation Oil	55 Gallons	18.15	Gallons	
027	Round House	5	Steel	Coal Distillation Oil	55 Gallons	18.15	Gallons	
028	Round House	5	Steel	Coal Distillation Oil	55 Gallons	55	Gallons	
X8	Round House	5	Steel	Turbine Oil	55 Gallons	0	Gallons	
041	Round House	5	Steel	Lubricant	55 Gallons	13.75	Gallons	
X9	Round House	5	Steel	Gear Oil	55 Gallons	0	Gallons	
057	Round House	5	Steel	Gear Oil	55 Gallons	55	Gallons	
056	Round House	5	Steel	Gear Oil	55 Gallons	55	Gallons	
036	Round House	5	Steel	Empty	55 Gallons	0	Gallons	
033	Round House	5	Steel	Empty	55 Gallons	0	Gallons	
037	Round House	5	Steel	Empty	55 Gallons	0	Gallons	
032	Round House	5	Steel	Contents Unknown	55 Gallons	55	Gallons	
046	Round House	5	Steel	Oil	55 Gallons	41.25	Gallons	
059	Round House	5	Steel	Antifreeze	55 Gallons	27.5	Gallons	
068	Round House	5	Steel	Gear Oil	55 Gallons	55	Gallons	
035	Round House	5	Steel	Gear Oil	55 Gallons	13.75	Gallons	
076	Round House	5	Steel	Contents Unknown	55 Gallons	13.75	Gallons	
8A	Round House	5	Steel	Hydraulic Oil	55 Gallons	13.75	Gallons	
053	Round House	5	Steel	Empty	55 Gallons	0	Gallons	
D008	Round House	5	Steel	Coal Distillation Oil	55 Gallons	13.75	Gallons	
D007	Round House	5	Steel	Coal Distillation Oil	55 Gallons	13.75	Gallons	
D005	Round House	5	Steel	Coal Distillation Oil	55 Gallons	27.5	Gallons	
D006	Round House	5	Steel	Coal Distillation Oil	55 Gallons	13.75	Gallons	
X12	Round House	5	Steel	Contents Unknown	55 Gallons	27.5	Gallons	
D017	Round House	5	Steel	Gear Oil	55 Gallons	13.75	Gallons	
D018	Round House	5	Steel	Coal Distillation Oil	55 Gallons	13.75	Gallons	
D016	Round House	5	Steel	Empty	55 Gallons	0	Gallons	
X13	Round House	5	Steel	Gear Oil	55 Gallons	13.75	Gallons	
074	Round House	5	Steel	Fuel Treatment	55 Gallons	55	Gallons	
X14	Round House	5	Steel	Contents Unknown	55 Gallons	13.75	Gallons	
X15	Round House	5	Steel	Empty	55 Gallons	0	Gallons	
042	Round House	5	Steel	Empty	55 Gallons	0	Gallons	
066	Round House	5	Steel	Gear Oil	55 Gallons	13.75	Gallons	
055	Round House	5	Steel	HS 620	55 Gallons	27.5	Gallons	
061	Round House	5	Steel	Waste Oil	27.5 Gallons	27.5	Gallons	
058	Round House	5	Steel	Waste Oil	27.5 Gallons	27.5	Gallons	
PD1	Round House	5	Polycarbonate	Empty	55 Gallons	0	Gallons	
PD2	Round House	5	Polycarbonate	Empty	55 Gallons	0	Gallons	
PD3	Round House	5	Polycarbonate	Possibly Diesel	55 Gallons	13.75	Gallons	
PD4	Round House	5	Polycarbonate	Possibly Empty	55 Gallons	0	Gallons	
PD5	Round House	5	Polycarbonate	Possibly Empty	55 Gallons	0	Gallons	
PD6	Round House	5	Polycarbonate	Possibly Empty	55 Gallons	0	Gallons	

Table 1
 Summary
 Containers > 20 Gallon Capacity
 Drum and Container IRM
 Riverview Innovation Technology Campus, Inc.
 Tonawanda, New York

Container ID	Building/Location	Building No.	Container Type	Content	Size	Estimated Current Volume	Units	Date of Disposition (See Note 1)
PD7	Round House	5	Polycarbonate	Possibly Empty	55 Gallons	0	Gallons	
PD8	Round House	5	Polycarbonate	Possibly Empty	55 Gallons	0	Gallons	
PD9	Round House	5	Polycarbonate	Possibly Empty	55 Gallons	0	Gallons	
PD10	Round House	5	Polycarbonate	Possibly Empty	55 Gallons	0	Gallons	
PD11	Round House	5	Polycarbonate	Possibly Empty	55 Gallons	0	Gallons	
PD12	Round House	5	Polycarbonate	Possibly Empty	55 Gallons	0	Gallons	
PD13	Round House	5	Polycarbonate	Possibly Empty	55 Gallons	0	Gallons	
PD14	Round House	5	Polycarbonate	Possibly Empty	55 Gallons	0	Gallons	
PD15	Round House	5	Polycarbonate	Possibly Empty	55 Gallons	0	Gallons	
PD16	Round House	5	Polycarbonate	Possibly Empty	55 Gallons	0	Gallons	
PD17	Round House	5	Polycarbonate	Possibly Empty	55 Gallons	0	Gallons	
PD18	Round House	5	Polycarbonate	Possibly Empty	55 Gallons	0	Gallons	
PD19	Round House	5	Polycarbonate	Possibly Empty	55 Gallons	0	Gallons	
PD20	Round House	5	Polycarbonate	Possibly Empty	55 Gallons	0	Gallons	
PD21	Round House	5	Polycarbonate	Possibly Empty	55 Gallons	0	Gallons	
PD22	Round House	5	Polycarbonate	Possibly Empty	55 Gallons	0	Gallons	
PD23	Round House	5	Polycarbonate	Possibly Empty	55 Gallons	0	Gallons	
PD24	Round House	5	Polycarbonate	Empty	27.5 Gallons	0	Gallons	
I21	Round House	5	Steel	Contents Unknown	55 Gallons	13.75	Gallons	
X17	Round House	5	Steel	Contents Unknown	55 Gallons	55	Gallons	
X16	Round House	5	Steel	Empty	55 Gallons	0	Gallons	
X18	Round House	5	Steel	Contents Unknown	55 Gallons	55	Gallons	
X19	Round House	5	Steel	Contents Unknown	55 Gallons	55	Gallons	
RT1	Round House	5	Polycarbonate	Used Anti-freeze	100 Gallons	240	Gallons	
RT2	Round House	5	Polycarbonate	Used oil	100 Gallons	240	Gallons	
RT3	Round House	5	Polycarbonate	Contents Unknown	100 Gallons	240	Gallons	
SRT4	Round House	5	Polycarbonate	Contents Unknown	100 Gallons	240	Gallons	
SRT5	Round House	5	Polycarbonate	Contents Unknown	100 Gallons	240	Gallons	
SRT6	Round House	5	Polycarbonate	Contents Unknown	150 Gallons	150	Gallons	
#1	Acid Shack	77	Polycarbonate	Sulfuric Acid	55 Gallons	27.5	Gallons	
#2	Acid Shack	77	Polycarbonate	Sulfuric Acid	55 Gallons	55	Gallons	
#3	Acid Shack	77	Polycarbonate	Sulfuric Acid	55 Gallons	55	Gallons	
#4	Acid Shack	77	Polycarbonate	Sulfuric Acid	55 Gallons	41.25	Gallons	
#5	Acid Shack	77	Polycarbonate	Sulfuric Acid	55 Gallons	0	Gallons	
#6	Acid Shack	77	Polycarbonate	Sulfuric Acid	55 Gallons	27.5	Gallons	
#7	Acid Shack	77	Polycarbonate	Sulfuric Acid	55 Gallons	13.75	Gallons	
#8	Acid Shack	77	Polycarbonate	Sulfuric Acid	55 Gallons	55	Gallons	
D52	BH-West End	43	Steel	Empty	55 Gallons	0	Gallons	
B1	BH-West End	43	Steel	Empty	55 Gallons	0	Gallons	
B2	BH-West End	43	Steel	Empty	55 Gallons	0	Gallons	
B3	BH-West End	43	Steel	Empty	55 Gallons	0	Gallons	
B4	BH-West End	43	Steel	Empty	55 Gallons	0	Gallons	
B5	BH-East End	43	Steel	Contents Unknown	55 Gallons	55	Gallons	
B6	BH-East End	43	Steel	Contents Unknown	55 Gallons	55	Gallons	
B7	BH-East End	43	Steel	Contents Unknown	55 Gallons	55	Gallons	
B8	BH	43	Steel	Empty	55 Gallons	0	Gallons	
B9	BH	43	Steel	Turbine Oil	55 Gallons	27.5	Gallons	
X18	Front of Round House	5	Steel	Hydraulic Oil	55 Gallons	13.75	Gallons	
160	Oil House	6	Steel	Empty	55 Gallons	0	Gallons	
118	Oil House	6	Steel	Empty	55 Gallons	0	Gallons	
A13	Oil House	6	Steel	Empty	55 Gallons	0	Gallons	
C8	Oil House	6	Steel	Empty	55 Gallons	0	Gallons	
090	Oil House	6	Steel	Empty	55 Gallons	0	Gallons	
880	Oil House	6	Steel	Empty	55 Gallons	0	Gallons	
080	Oil House	6	Steel	Empty	55 Gallons	0	Gallons	
078	Oil House	6	Steel	Empty	55 Gallons	0	Gallons	
086	Oil House	6	Steel	Empty	55 Gallons	0	Gallons	
092	Oil House	6	Steel	Empty	55 Gallons	0	Gallons	
089	Oil House	6	Steel	Empty	55 Gallons	0	Gallons	
084	Oil House	6	Steel	Empty	55 Gallons	0	Gallons	
115	Oil House	6	Steel	Empty	55 Gallons	0	Gallons	
119	Oil House	6	Steel	Empty	55 Gallons	0	Gallons	
117	Oil House	6	Steel	Empty	55 Gallons	0	Gallons	
116	Oil House	6	Steel	Empty	55 Gallons	0	Gallons	
114	Oil House	6	Steel	Empty	55 Gallons	0	Gallons	
108	Oil House	6	Steel	Empty	55 Gallons	0	Gallons	
109	Oil House	6	Steel	Empty	55 Gallons	0	Gallons	
105	Oil House	6	Steel	Empty	55 Gallons	0	Gallons	
104	Oil House	6	Steel	Empty	55 Gallons	0	Gallons	
103	Oil House	6	Steel	Empty	55 Gallons	0	Gallons	
110	Oil House	6	Steel	Empty	55 Gallons	0	Gallons	
102	Oil House	6	Steel	Empty	55 Gallons	0	Gallons	

Table 1
 Summary
 Containers > 20 Gallon Capacity
 Drum and Container IRM
 Riverview Innovation Technology Campus, Inc.
 Tonawanda, New York

Container ID	Building/Location	Building No.	Container Type	Content	Size	Estimated Current Volume	Units	Date of Disposition (See Note 1)
060	Collection North of GW	North of 18	Steel	Solids (Non-Hazardous)	55 Gallons	55	Gallons	
061	Collection North of GW	North of 18	Steel	Solids (Non-Hazardous)	55 Gallons	55	Gallons	
062	Collection North of GW	North of 18	Steel	Solids (Non-Hazardous)	55 Gallons	55	Gallons	
063	Collection North of GW	North of 18	Steel	Solids (Non-Hazardous)	55 Gallons	55	Gallons	
064	Collection North of GW	North of 18	Steel	Solids (Non-Hazardous)	55 Gallons	55	Gallons	
065	Collection North of GW	North of 18	Steel	Solids (Non-Hazardous)	55 Gallons	55	Gallons	
066	Collection North of GW	North of 18	Steel	Solids (Non-Hazardous)	55 Gallons	55	Gallons	
067	Collection North of GW	North of 18	Steel	Solids (Non-Hazardous)	55 Gallons	55	Gallons	
068	Collection North of GW	North of 18	Steel	Solids (Non-Hazardous)	55 Gallons	55	Gallons	
069	Collection North of GW	North of 18	Steel	Solids (Non-Hazardous)	55 Gallons	55	Gallons	
070	Collection North of GW	North of 18	Steel	Solids (Non-Hazardous)	55 Gallons	55	Gallons	
071	Collection North of GW	North of 18	Steel	Solids (Non-Hazardous)	55 Gallons	55	Gallons	
072	Collection North of GW	North of 18	Steel	Solids (Non-Hazardous)	55 Gallons	55	Gallons	
073	Collection North of GW	North of 18	Steel	Solids (Non-Hazardous)	55 Gallons	55	Gallons	
074	Collection North of GW	North of 18	Steel	Solids (Non-Hazardous)	55 Gallons	55	Gallons	
075	Collection North of GW	North of 18	Steel	Solids (Non-Hazardous)	55 Gallons	55	Gallons	
076	Collection North of GW	North of 18	Steel	Solids (Non-Hazardous)	55 Gallons	55	Gallons	
077	Collection North of GW	North of 18	Steel	Solids (Non-Hazardous)	55 Gallons	55	Gallons	
078	Collection North of GW	North of 18	Steel	Solids (Non-Hazardous)	55 Gallons	55	Gallons	
079	Collection North of GW	North of 18	Steel	Solids (Non-Hazardous)	55 Gallons	55	Gallons	
080	Collection North of GW	North of 18	Steel	Solids (Non-Hazardous)	55 Gallons	55	Gallons	
081	Collection North of GW	North of 18	Steel	Solids (Non-Hazardous)	55 Gallons	55	Gallons	
WH1	Inside of GW	18	Steel	Solids	55 Gallons	55	Gallons	
WH2	Inside of GW	18	Steel	Solids	55 Gallons	55	Gallons	
WH3	Inside of GW	18	Steel	Solids	55 Gallons	55	Gallons	
WH4	Inside of GW	18	Steel	Solids	55 Gallons	55	Gallons	
WH5	Inside of GW	18	Steel	Solids	55 Gallons	55	Gallons	
WH6	Inside of GW	18	Steel	Solids	55 Gallons	55	Gallons	
WH7	Inside of GW	18	Steel	Solids	55 Gallons	55	Gallons	
WH8	Inside of GW	18	Steel	Solids	55 Gallons	55	Gallons	
WH9	Inside of GW	18	Steel	Solids	55 Gallons	55	Gallons	
WH10	Inside of GW	18	Steel	Solids	55 Gallons	55	Gallons	
GD001	Inside of Gray Shed	16	Steel	Hydraulic Oil	55 Gallons	55	Gallons	
GD002	Inside of Gray Shed	16	Steel	Hydraulic Oil	55 Gallons	55	Gallons	
GD003	Inside of Gray Shed	16	Steel	Hydraulic Oil	55 Gallons	55	Gallons	
GD004	Inside of Gray Shed	16	Steel	Hydraulic Oil	55 Gallons	55	Gallons	
G1	Inside of Gray Shed	16	Steel	Coal Distillation Oil	55 Gallons	55	Gallons	
G2	Inside of Gray Shed	16	Steel	Coal Distillation Oil	55 Gallons	55	Gallons	
G3	Inside of Gray Shed	16	Steel	Coal Distillation Oil	55 Gallons	55	Gallons	
G4	Inside of Gray Shed	16	Steel	Coal Distillation Oil	55 Gallons	55	Gallons	
G5	Inside of Gray Shed	16	Steel	Empty	55 Gallons	0	Gallons	
G6	Inside of Gray Shed	16	Steel	Hydraulic Oil	55 Gallons	27.5	Gallons	
G7	Inside of Gray Shed	16	Steel	Hydraulic Oil	55 Gallons	55	Gallons	
G8	Inside of Gray Shed	16	Steel	Empty	55 Gallons	0	Gallons	
GD019	Inside of Gray Shed	16	Steel	Coal Distillation Oil	55 Gallons	55	Gallons	
GD020	Inside of Gray Shed	16	Steel	Coal Distillation Oil	55 Gallons	55	Gallons	
GD021	Inside of Gray Shed	16	Steel	Coal Distillation Oil	55 Gallons	55	Gallons	
GD022	Inside of Gray Shed	16	Steel	Coal Distillation Oil	55 Gallons	55	Gallons	
GD023	Inside of Gray Shed	16	Steel	Coal Distillation Oil	55 Gallons	55	Gallons	
GD024	Inside of Gray Shed	16	Steel	Coal Distillation Oil	55 Gallons	55	Gallons	
GD025	Inside of Gray Shed	16	Steel	Coal Distillation Oil	55 Gallons	55	Gallons	
GD026	Inside of Gray Shed	16	Steel	Coal Distillation Oil	55 Gallons	55	Gallons	
T004	Inside of Gray Shed	16	Steel	Solids (Uncharacterized)	300 Gallons	300	Gallons	
082	North of boiler house	North of 43	Steel	Solids (Uncharacterized)	55 Gallons	55	Gallons	
083	South of boiler house	North of 43	Steel	Solids (Uncharacterized)	55 Gallons	55	Gallons	
084	North of pump house	North of 38	Steel	Solids (Uncharacterized)	55 Gallons	55	Gallons	
PH1	Inside of pump house	38	Steel	Empty	55 Gallons	0	Gallons	
PH2	Inside of pump house	38	Steel	Contents Unknown	55 Gallons	55	Gallons	
PH3	Inside of pump house	38	Steel	Contents Unknown	55 Gallons	27.5	Gallons	
PH4	Inside of pump house	38	Steel	Contents Unknown	55 Gallons	27.5	Gallons	
BC01	Breeze Crusher Building	63	Polycarbonate	Calcium Chloride	55 Gallons	55	Gallons	
BC02	Breeze Crusher Building	63	Polycarbonate	Calcium Chloride	55 Gallons	55	Gallons	
BC03	Breeze Crusher Building	63	Polycarbonate	Calcium Chloride	55 Gallons	55	Gallons	
BC04	Breeze Crusher Building	63	Steel	Contents Unknown	55 Gallons	27.5	Gallons	
BC05	Breeze Crusher Building	63	Steel	Contents Unknown	55 Gallons	27.5	Gallons	
BC06	Breeze Crusher Building	63	Steel	Contents Unknown	55 Gallons	27.5	Gallons	
BC07	Breeze Crusher Building	63	Steel	Empty	55 Gallons	0	Gallons	
MS001	Machine Shop	8	Steel	Flammable liquids	55 Gallons	55	Gallons	
MS002	Machine Shop	8	Polycarbonate	Solids	55 Gallons	27.5	Gallons	
MS003	Machine Shop	8	Polycarbonate	Solids (Debris)	55 Gallons	13.75	Gallons	
MS004	Machine Shop	8	Polycarbonate	Solids (Light Bulbs)	55 Gallons	55	Gallons	
MS005	Machine Shop	8	Steel	Solids	55 Gallons	55	Gallons	
MS006	Machine Shop	8	Steel	Cement	55 Gallons	55	Gallons	
MS007	Machine Shop	8	Steel	Cement	55 Gallons	55	Gallons	
EB001	Exhauster Building	20	Steel	Empty	55 Gallons	0	Gallons	
EB002	Exhauster Building	20	Steel	Noco Lube	55 Gallons	27.5	Gallons	
EB003	Exhauster Building	20	Steel	Contents Unknown	55 Gallons	13.75	Gallons	
EB004	Exhauster Building	20	Steel	Contents Unknown	55 Gallons	13.75	Gallons	
							Gallons	
							Gallons	
							Gallons	

Estimated Volume 10229.45 Gallons

Notes:

- Final disposition will be dependent on characterization and approval of suppliers and disposal facilities. See Tables 2 to 8 for anticipated disposition.

Table 2
 Empty Containers
 Drum and Container IRM
 Riverview Innovation Technology Campus, Inc.
 Tonawanda, New York

Container ID	Building/Location	Building No.	Container Type	Content	Size	Estimated Current Volume	Units	Expected Dispositon	Date of Disposition
D009	Round House	5	Steel	Empty	55 Gallons	0	Gallons	Recycled	
D013	Round House	5	Steel	Empty	55 Gallons	0	Gallons	Recycled	
D014	Round House	5	Steel	Empty	55 Gallons	0	Gallons	Recycled	
D015	Round House	5	Steel	Empty	55 Gallons	0	Gallons	Recycled	
X1	Round House	5	Steel	Empty	55 Gallons	0	Gallons	Recycled	
X2	Round House	5	Steel	Empty	55 Gallons	0	Gallons	Recycled	
044	Round House	5	Steel	Empty	55 Gallons	0	Gallons	Recycled	
X4	Round House	5	Steel	Empty	55 Gallons	0	Gallons	Recycled	
X5	Round House	5	Steel	Empty	55 Gallons	0	Gallons	Recycled	
031	Round House	5	Steel	Empty	55 Gallons	0	Gallons	Recycled	
X7	Round House	5	Steel	Empty	55 Gallons	0	Gallons	Recycled	
036	Round House	5	Steel	Empty	55 Gallons	0	Gallons	Recycled	
033	Round House	5	Steel	Empty	55 Gallons	0	Gallons	Recycled	
037	Round House	5	Steel	Empty	55 Gallons	0	Gallons	Recycled	
053	Round House	5	Steel	Empty	55 Gallons	0	Gallons	Recycled	
D016	Round House	5	Steel	Empty	55 Gallons	0	Gallons	Recycled	
PD1	Round House	5	Polycarbonate	Empty	55 Gallons	0	Gallons	Recycled	
PD2	Round House	5	Polycarbonate	Empty	55 Gallons	0	Gallons	Recycled	
PD3	Round House	5	Polycarbonate	Possibly Diesel	55 Gallons	0	Gallons	Recycled	
PD4	Round House	5	Polycarbonate	Possibly Empty	55 Gallons	0	Gallons	Recycled	
PD5	Round House	5	Polycarbonate	Possibly Empty	55 Gallons	0	Gallons	Recycled	
PD6	Round House	5	Polycarbonate	Possibly Empty	55 Gallons	0	Gallons	Recycled	
PD7	Round House	5	Polycarbonate	Possibly Empty	55 Gallons	0	Gallons	Recycled	
PD8	Round House	5	Polycarbonate	Possibly Empty	55 Gallons	0	Gallons	Recycled	
PD9	Round House	5	Polycarbonate	Possibly Empty	55 Gallons	0	Gallons	Recycled	
PD10	Round House	5	Polycarbonate	Possibly Empty	55 Gallons	0	Gallons	Recycled	
PD11	Round House	5	Polycarbonate	Possibly Empty	55 Gallons	0	Gallons	Recycled	
PD12	Round House	5	Polycarbonate	Possibly Empty	55 Gallons	0	Gallons	Recycled	
PD13	Round House	5	Polycarbonate	Possibly Empty	55 Gallons	0	Gallons	Recycled	
PD14	Round House	5	Polycarbonate	Possibly Empty	55 Gallons	0	Gallons	Recycled	
PD15	Round House	5	Polycarbonate	Possibly Empty	55 Gallons	0	Gallons	Recycled	
PD16	Round House	5	Polycarbonate	Possibly Empty	55 Gallons	0	Gallons	Recycled	
PD17	Round House	5	Polycarbonate	Possibly Empty	55 Gallons	0	Gallons	Recycled	
PD18	Round House	5	Polycarbonate	Possibly Empty	55 Gallons	0	Gallons	Recycled	
PD19	Round House	5	Polycarbonate	Possibly Empty	55 Gallons	0	Gallons	Recycled	
PD20	Round House	5	Polycarbonate	Possibly Empty	55 Gallons	0	Gallons	Recycled	
PD21	Round House	5	Polycarbonate	Possibly Empty	55 Gallons	0	Gallons	Recycled	
PD22	Round House	5	Polycarbonate	Possibly Empty	55 Gallons	0	Gallons	Recycled	
PD23	Round House	5	Polycarbonate	Possibly Empty	55 Gallons	0	Gallons	Recycled	
PD24	Round House	5	Polycarbonate	Empty	27.5 Gallons	0	Gallons	Recycled	
D52	BH-West End	43	Steel	Empty	55 Gallons	0	Gallons	Recycled	
B1	BH-West End	43	Steel	Empty	55 Gallons	0	Gallons	Recycled	
B2	BH-West End	43	Steel	Empty	55 Gallons	0	Gallons	Recycled	
B3	BH-West End	43	Steel	Empty	55 Gallons	0	Gallons	Recycled	
B4	BH-West End	43	Steel	Empty	55 Gallons	0	Gallons	Recycled	
B8	BH	43	Steel	Empty	55 Gallons	0	Gallons	Recycled	
160	Oil House	6	Steel	Empty	55 Gallons	0	Gallons	Recycled	
118	Oil House	6	Steel	Empty	55 Gallons	0	Gallons	Recycled	
A13	Oil House	6	Steel	Empty	55 Gallons	0	Gallons	Recycled	
C8	Oil House	6	Steel	Empty	55 Gallons	0	Gallons	Recycled	
090	Oil House	6	Steel	Empty	55 Gallons	0	Gallons	Recycled	
880	Oil House	6	Steel	Empty	55 Gallons	0	Gallons	Recycled	
080	Oil House	6	Steel	Empty	55 Gallons	0	Gallons	Recycled	
078	Oil House	6	Steel	Empty	55 Gallons	0	Gallons	Recycled	
086	Oil House	6	Steel	Empty	55 Gallons	0	Gallons	Recycled	
092	Oil House	6	Steel	Empty	55 Gallons	0	Gallons	Recycled	
089	Oil House	6	Steel	Empty	55 Gallons	0	Gallons	Recycled	
084	Oil House	6	Steel	Empty	55 Gallons	0	Gallons	Recycled	
115	Oil House	6	Steel	Empty	55 Gallons	0	Gallons	Recycled	
119	Oil House	6	Steel	Empty	55 Gallons	0	Gallons	Recycled	
117	Oil House	6	Steel	Empty	55 Gallons	0	Gallons	Recycled	
116	Oil House	6	Steel	Empty	55 Gallons	0	Gallons	Recycled	

Table 2
 Empty Containers
 Drum and Container IRM
 Riverview Innovation Technology Campus, Inc.
 Tonawanda, New York

Container ID	Building/Location	Building No.	Container Type	Content	Size	Estimated Current Volume	Units	Expected Dispositon	Date of Disposition
114	Oil House	6	Steel	Empty	55 Gallons	0	Gallons	Recycled	
108	Oil House	6	Steel	Empty	55 Gallons	0	Gallons	Recycled	
109	Oil House	6	Steel	Empty	55 Gallons	0	Gallons	Recycled	
105	Oil House	6	Steel	Empty	55 Gallons	0	Gallons	Recycled	
104	Oil House	6	Steel	Empty	55 Gallons	0	Gallons	Recycled	
103	Oil House	6	Steel	Empty	55 Gallons	0	Gallons	Recycled	
110	Oil House	6	Steel	Empty	55 Gallons	0	Gallons	Recycled	
102	Oil House	6	Steel	Empty	55 Gallons	0	Gallons	Recycled	
101	Oil House	6	Steel	Empty	55 Gallons	0	Gallons	Recycled	
096	Oil House	6	Steel	Empty	55 Gallons	0	Gallons	Recycled	
095	Oil House	6	Steel	Empty	55 Gallons	0	Gallons	Recycled	
093	Oil House	6	Steel	Empty	55 Gallons	0	Gallons	Recycled	
098	Oil House	6	Steel	Empty	55 Gallons	0	Gallons	Recycled	
112	Oil House	6	Steel	Empty	55 Gallons	0	Gallons	Recycled	
094	Oil House	6	Steel	Empty	55 Gallons	0	Gallons	Recycled	
111	Oil House	6	Steel	Empty	55 Gallons	0	Gallons	Recycled	
#5	Acid Shack	77	Polycarbonate	Empty	55 Gallons	0	Gallons	Recycled	
X15	Round House	5	Steel	Empty	55 Gallons	0	Gallons	Recycled	
042	Round House	5	Steel	Empty	55 Gallons	0	Gallons	Recycled	
X16	Round House	5	Steel	Empty	55 Gallons	0	Gallons	Recycled	
X8	Round House	5	Steel	Empty	55 Gallons	0	Gallons	Recycled	
X9	Round House	5	Steel	Empty	55 Gallons	0	Gallons	Recycled	
G5	Inside of Gray Shed	16	Steel	Empty	55 Gallons	0	Gallons	Recycled	
G8	Inside of Gray Shed	16	Steel	Empty	55 Gallons	0	Gallons	Recycled	
PH1	Pump House	38	Steel	Empty	55 Gallons	0	Gallons	Recycled	
BC07	Breeze Crusher Building	63	Steel	Empty	55 Gallons	0	Gallons	Recycled	
EB001	Exhauster Building	20	Steel	Empty	55 Gallons	0	Gallons	Recycled	

Estimated Volume 0 Gallons

Table 3
 Coal Distillation Oil Drum and
 Container IRM
 Riverview Innovation Technology Campus, Inc.
 Tonawanda, New York

Container ID	Building/Location	Building No.	Container Type	Content	Size	Estimated Current Volume	Units	Expected Dispositon	Date of Disposition
D010	Round House	5	Steel	Coal Distillation Oil	55 Gallons	13.75	Gallons	Return to Producer	
D012	Round House	5	Steel	Coal Distillation Oil	55 Gallons	13.75	Gallons	Return to Producer	
D011	Round House	5	Steel	Coal Distillation Oil	55 Gallons	27.5	Gallons	Return to Producer	
026	Round House	5	Steel	Coal Distillation Oil	55 Gallons	18.15	Gallons	Return to Producer	
025	Round House	5	Steel	Coal Distillation Oil	55 Gallons	18.15	Gallons	Return to Producer	
027	Round House	5	Steel	Coal Distillation Oil	55 Gallons	18.15	Gallons	Return to Producer	
028	Round House	5	Steel	Coal Distillation Oil	55 Gallons	55	Gallons	Return to Producer	
D008	Round House	5	Steel	Coal Distillation Oil	55 Gallons	13.75	Gallons	Return to Producer	
D007	Round House	5	Steel	Coal Distillation Oil	55 Gallons	13.75	Gallons	Return to Producer	
D005	Round House	5	Steel	Coal Distillation Oil	55 Gallons	27.5	Gallons	Return to Producer	
D006	Round House	5	Steel	Coal Distillation Oil	55 Gallons	13.75	Gallons	Return to Producer	
D018	Round House	5	Steel	Coal Distillation Oil	55 Gallons	13.75	Gallons	Return to Producer	
G1	Inside of Gray Shed	16	Steel	Coal Distillation Oil	55 Gallons	55	Gallons	Return to Producer	
G2	Inside of Gray Shed	16	Steel	Coal Distillation Oil	55 Gallons	55	Gallons	Return to Producer	
G3	Inside of Gray Shed	16	Steel	Coal Distillation Oil	55 Gallons	55	Gallons	Return to Producer	
G4	Inside of Gray Shed	16	Steel	Coal Distillation Oil	55 Gallons	55	Gallons	Return to Producer	
GD019	Inside of Gray Shed	16	Steel	Coal Distillation Oil	55 Gallons	55	Gallons	Return to Producer	
GD020	Inside of Gray Shed	16	Steel	Coal Distillation Oil	55 Gallons	55	Gallons	Return to Producer	
GD021	Inside of Gray Shed	16	Steel	Coal Distillation Oil	55 Gallons	55	Gallons	Return to Producer	
GD022	Inside of Gray Shed	16	Steel	Coal Distillation Oil	55 Gallons	55	Gallons	Return to Producer	
GD023	Inside of Gray Shed	16	Steel	Coal Distillation Oil	55 Gallons	55	Gallons	Return to Producer	
GD024	Inside of Gray Shed	16	Steel	Coal Distillation Oil	55 Gallons	55	Gallons	Return to Producer	
GD025	Inside of Gray Shed	16	Steel	Coal Distillation Oil	55 Gallons	55	Gallons	Return to Producer	
GD026	Inside of Gray Shed	16	Steel	Coal Distillation Oil	55 Gallons	55	Gallons	Return to Producer	

Estimated Volume 906.95 Gallons

Table 4
 Sulfuric Acid Drums
 Drum and Container IRM
 Riverview Innovation Technology Campus, Inc.
 Tonawanda, New York

Container ID	Building/ Location	Building No.	Container Type	Content	Size	Estimated Current Volume	Units	Dispositon	Date of Disposition
#1	Acid Shack	77	Polycarbonate	Sulfuric Acid	55 Gallons	27.5	Gallons	Use for Water Treatment	
#2	Acid Shack	77	Polycarbonate	Sulfuric Acid	55 Gallons	55	Gallons	Use for Water Treatment	
#3	Acid Shack	77	Polycarbonate	Sulfuric Acid	55 Gallons	55	Gallons	Use for Water Treatment	
#4	Acid Shack	77	Polycarbonate	Sulfuric Acid	55 Gallons	41.25	Gallons	Use for Water Treatment	
#6	Acid Shack	77	Polycarbonate	Sulfuric Acid	55 Gallons	27.5	Gallons	Use for Water Treatment	
#7	Acid Shack	77	Polycarbonate	Sulfuric Acid	55 Gallons	13.75	Gallons	Use for Water Treatment	
#8	Acid Shack	77	Polycarbonate	Sulfuric Acid	55 Gallons	55	Gallons	Use for Water Treatment	

Estimated Volume 275 Gallons

Table 5
 Petroleum Products
 Drum and Container IRM
 Riverview Innovation Technology Campus, Inc.
 Tonawanda, New York

Container ID	Building/ Location	Building No.	Container Type	Content	Size	Estimated Current Volume	Units	Disposition	Date of Disposition
Antifreeze Container (Composite Sample)									
070	Round House	5	Steel	Antifreeze	55 Gallons	27.5	Gallons	Offsite Disposal	
RT2	Round House	5	Polycarbonate	Used Anti-freeze	300 Gallons	240	Gallons	Offsite Disposal	
Houghton Safe 620 Containers (Composite Sample)									
062	Round House	5	Steel	Fuel Treatment	55 Gallons	27.5	Gallons	Recycle by Producer	
069	Round House	5	Steel	Fuel Treatment	55 Gallons	27.5	Gallons	Recycle by Producer	
045	Round House	5	Steel	Fuel Treatment	55 Gallons	55	Gallons	Recycle by Producer	
Houghton Safe 620 Containers (Composite Sample)									
X6	Round House	5	Steel	Gear Oil	55 Gallons	55	Gallons	Recycle by Producer	
048	Round House	5	Steel	Gear Oil	55 Gallons	55	Gallons	Recycle by Producer	
038	Round House	5	Steel	Gear Oil	55 Gallons	55	Gallons	Recycle by Producer	
041	Round House	5	Steel	Gear Oil	55 Gallons	13.75	Gallons	Recycle by Producer	
057	Round House	5	Steel	Gear Oil	55 Gallons	13.75	Gallons	Recycle by Producer	
056	Round House	5	Steel	Gear Oil	55 Gallons	13.75	Gallons	Recycle by Producer	
046	Round House	5	Steel	Gear Oil	55 Gallons	13.75	Gallons	Recycle by Producer	
Houghton Safe 620 Containers (Composite Sample)									
059	Round House	5	Steel	Houghton Safe 620	55 Gallons	13.75	Gallons	Recycle by Producer	
068	Round House	5	Steel	Houghton Safe 620	55 Gallons	27.5	Gallons	Recycle by Producer	
035	Round House	5	Steel	Houghton Safe 620 ("HS 620")	55 Gallons	27.5	Gallons	Recycle by Producer	
Hydraulic Oil Containers (Composite Sample)									
8A	Round House	5	Steel	Hydraulic Oil	55 Gallons	13.75	Gallons	Recycle by NOCO	
D017	Front of Round House	5	Steel	Hydraulic Oil	55 Gallons	13.75	Gallons	Recycle by NOCO	
GD001	Inside of Gray Shed	16	Steel	Hydraulic Oil	55 Gallons	55	Gallons	Recycle by NOCO	
GD002	Inside of Gray Shed	16	Steel	Hydraulic Oil	55 Gallons	55	Gallons	Recycle by NOCO	
GD003	Inside of Gray Shed	16	Steel	Hydraulic Oil	55 Gallons	55	Gallons	Recycle by NOCO	
GD004	Inside of Gray Shed	16	Steel	Hydraulic Oil	55 Gallons	55	Gallons	Recycle by NOCO	
G6	Inside of Gray Shed	16	Steel	Hydraulic Oil	55 Gallons	27.5	Gallons	Recycle by NOCO	
G7	Inside of Gray Shed	16	Steel	Hydraulic Oil	55 Gallons	55	Gallons	Recycle by NOCO	
NOCO Lubricant Containers (Composite Sample)									
X13	Round House	5	Steel	Lubricant	55 Gallons	13.75	Gallons	Recycle by NOCO	
074	Round House	5	Steel	Noco CS4 HD	55 Gallons	27.5	Gallons	Recycle by NOCO	
Suspected Diesel Fuel Container (Composite Sample)									
055	Round House	5	Polycarbonate	Possibly Diesel	55 Gallons	13.75	Gallons	Offsite Disposal	
Waste Oil Containers (Composite Sample)									
061	Round House	5	Steel	Transmission Fluid	55 Gallons	13.75	Gallons	Recycle Offsite	
058	BH	43	Steel	Turbine Oil	55 Gallons	27.5	Gallons	Recycle Offsite	
RT1	Round House	5	Steel	Turbine T68	55 Gallons	13.75	Gallons	Recycle Offsite	
066	Round House	5	Steel	Oil	55 Gallons	41.25	Gallons	Recycle Offsite	
B9	Round House	5	Polycarbonate	Used oil	100 Gallons	240	Gallons	Recycle Offsite	
X18	Round House	5	Steel	Waste Oil	27.5 Gallons	27.5	Gallons	Recycle Offsite	
PD3	Round House	5	Steel	Waste Oil	27.5 Gallons	27.5	Gallons	Recycle Offsite	

Estimated Volume 1442.5 Gallons

Table 7
Waste Water Treatment Residuals
Drum and Container IRM
Riverview Innovation Technology Campus, Inc.
Tonawanda, New York

Container ID	Building/Location	Building No.	Container Type	Content	Size	Estimated Current Volume	Units	Dispositon	Date of Disposition
WH1	Inside of GW	18	Steel	Solids	55 Gallons	55	Gallons	Incineration	
WH2	Inside of GW	18	Steel	Solids	55 Gallons	55	Gallons	Incineration	
WH3	Inside of GW	18	Steel	Solids	55 Gallons	55	Gallons	Incineration	
WH4	Inside of GW	18	Steel	Solids	55 Gallons	55	Gallons	Incineration	
WH5	Inside of GW	18	Steel	Solids	55 Gallons	55	Gallons	Incineration	
WH6	Inside of GW	18	Steel	Solids	55 Gallons	55	Gallons	Incineration	
WH7	Inside of GW	18	Steel	Solids	55 Gallons	55	Gallons	Incineration	
WH8	Inside of GW	18	Steel	Solids	55 Gallons	55	Gallons	Incineration	
WH9	Inside of GW	18	Steel	Solids	55 Gallons	55	Gallons	Incineration	
WH10	Inside of GW	18	Steel	Solids	55 Gallons	55	Gallons	Incineration	

Estimated Volume	550 Gallons
	7400 Pounds
	4 Tons

Notes:

Table 8
 Containers with Unknown or Poorly Labeled Contents
 Drum and Container IRM
 Riverview Innovation Technology Campus, Inc.
 Tonawanda, New York

Container ID	Building/ Location	Building No.	Container Type	Content	Size	Estimated Current Volume	Units	Disposition	Date of Disposition
Trash and Materials From Cleaning (Composite Sample)									
B5	BH-East End	43	Steel	Contents Unknown	55 Gallons		55 Gallons	Offsite Disposal	
B6	BH-East End	43	Steel	Contents Unknown	55 Gallons		55 Gallons	Offsite Disposal	
B7	BH-East End	43	Steel	Contents Unknown	55 Gallons		55 Gallons	Offsite Disposal	
NOCO Lubricant Containers (Composite Sample)									
063	Round House	5	Steel	Contents Unknown	55 Gallons	13.75	Gallons	Recycle by NOCO	
076	Round House	5	Steel	Contents Unknown	55 Gallons	13.75	Gallons	Recycle by NOCO	
Suspected Hydraulic Fluid Containers (Composite Sample)									
043	Round House	5	Steel	Contents Unknown	55 Gallons	13.75	Gallons	Recycle by NOCO	
067	Round House	5	Steel	Contents Unknown	55 Gallons	13.75	Gallons	Recycle by NOCO	
032	Round House	5	Steel	Contents Unknown	55 Gallons		55 Gallons	Recycle by NOCO	
X18	Round House	5	Steel	Contents Unknown	55 Gallons		55 Gallons	Recycle by NOCO	
Suspected Houghton Safe 620 Containers (Composite Sample)									
039	Round House	5	Steel	Contents Unknown	55 Gallons	27.5	Gallons	Recycle by Producer	
SRT4	Round House	5	Steel	Contents Unknown (Suspected Waste Oil)	300 Gallons	240	Gallons	Recycle by Producer	
SRT5	Exhauster Building	20	Polycarbonate	Contents Unknown	300 Gallons	240	Gallons	Recycle by Producer	
Suspected Beacon Lubricants Containers (Composite Sample)									
X12	Round House	5	Steel	Contents Unknown	55 Gallons	27.5	Gallons	Recycle by Producer	
X17	Round House	5	Steel	Contents Unknown	55 Gallons	55	Gallons	Recycle by Producer	
X19	Round House	5	Steel	Contents Unknown	55 Gallons	55	Gallons	Recycle by Producer	
Suspected Waste Oil Containers (Composite Sample)									
RT3	Round House	5	Polycarbonate	Contents Unknown	300 Gallons	240	Gallons	Recycle Offsite	
SRT6 (short tank)	Round House	5	Steel	Contents Unknown (Suspected Waste Oil)	150 Gallons	150	Gallons	Recycle Offsite	
Waste Drum (Composite Samples)									
121	Round House	5	Steel	Contents Unknown	55 Gallons	13.75	Gallons	Offsite Disposal	
T004	Inside of Gray Shed	16	Steel	Solids (Uncharacterized)	300 Gallons	300	Gallons	Offsite Disposal	
Miscellaneous (Composite Samples)									
EB003	Exhauster Building	20	Steel	Contents Unknown	55 Gallons	13.75	Gallons	Offsite Disposal	
EB004	Exhauster Building	20	Steel	Contents Unknown	55 Gallons	13.75	Gallons	Offsite Disposal	
PH2	Inside of Pump House	38	Steel	Contents Unknown	55 Gallons	13.75	Gallons	Offsite Disposal	
PH3	Inside of Pump House	38	Steel	Contents Unknown	55 Gallons	13.75	Gallons	Offsite Disposal	
PH4	Inside of Pump House	38	Steel	Contents Unknown	55 Gallons	13.75	Gallons	Offsite Disposal	

Estimated Volume	432.5 Gallons
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Appendices



Appendix A – Removal Assessment Data (Weston, 2019)



Appendix B – Wastewater Treatment Residual Data



Appendix C – Photographs – Unknown Contents Containers





Photograph C-1

Drums B5, B6 and B7 in East End of Boiler House (Building No. 43)





Photograph C-2

Drum 063 in Maintenance Shop (Building No. 5)

Appears to be a NOCO Lubricating Oil Container





Photograph C-3

Drum 043 in Maintenance Building (Building No. 5)

Same Drum as Hydraulic Fluid Drums





Photograph C-4

Drum 060 in Maintenance Building (Building No. 5)

Appearance of a Beacon Lubricants Drum





Photograph C-5

Drum 039 in Maintenance Building (Building No. 5)

One-half full ~27.5 Gallons of liquid

Similar to Houghton-Safe 620 Drum (038)





Photograph C-6

Drums 032 and 067 in Maintenance Building (Building No. 5)

Drum 032 is full

Drum 067 has an estimated 14 gallons (1/4 full)

Same Drum as Hydraulic Fluid Drums





Photograph C-7

Drum 076 in the Maintenance Building (Building No. 5)

Drum 076 has an estimated 14 gallons (1/4 full)

Appears to be a NOCO Lubricating Oil Container





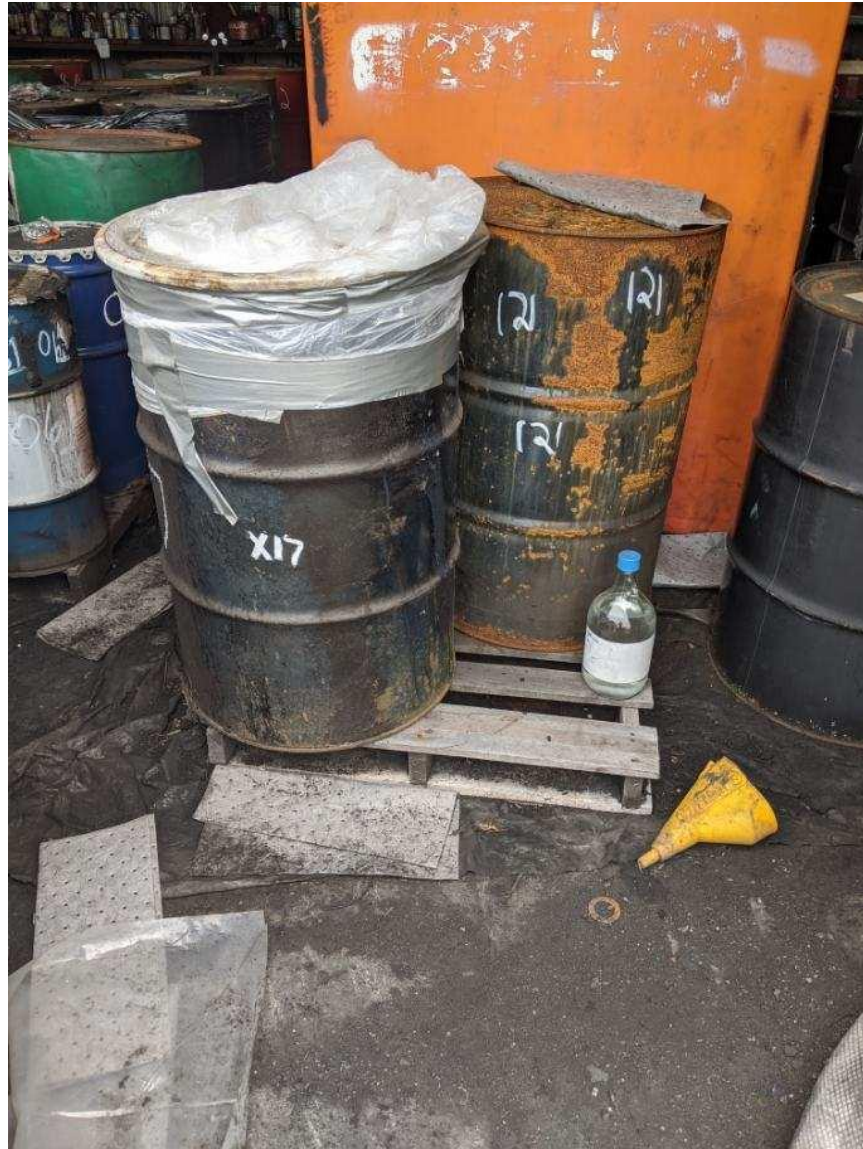
Photograph C-8

Drum X12 in Maintenance Building (Building No. 5)

One-half full ~ 28 Gallons

Similar to Beacon Lubricants





Photograph C-9

Drums X17 and 121 in Maintenance Building (Building No. 5)

X17 is a Full Container ~ 55 Gallons

121 is 1/4 full ~ 14 Gallons





Photograph C-10

Drums X18 and X19 in Maintenance Building (Building No. 5)

Both Full ~ 55 Gallons Each





Photograph C-11
300-Gallon Tote RT-3
Appearance of Waste Oil





Photograph C-12

Tote SRT-4

Houghton Container – Glycol Fire Resistant Hydraulic Fluid





Photograph C-13

300 Gallon Tote SRT – 5 (Similar to SRT -4)





Photograph C-14

Low Steel Container SRT6 in Maintenance Building (BuildingNO. 5)

Appearance of Waste Oil from Maintenance Shop



Appendix D – Photographs – Hazardous Waste Storage Area





