



International Business Machines Corporation

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February 9, 1998

Mr. Edwin Dassatti
New York State
Department of Environmental Conservation
Bureau of Eastern Hazardous Waste Programs
Division of Hazardous Substances Regulations
50 Wolf Road
Albany, New York 12233-7251

Re: IBM Kingston Facility, Part 373 Permit No. 3-5154-00067/00090
Notification of determination of New SWMU and
Transmittal of SWMU Assessment Report
Inactive West Demolition Debris Fill Area, SWMU AF

Dear Mr. Dassatti:

This letter serves to notify NYSDEC of the identification of a new Solid Waste Management Unit, (SWMU) as per IBM's Part 373 Hazardous Waste Management Permit Condition III.C.1. This unit is located west of the Salt Barn (Building 070) as shown on the attached figure; it has been named the Inactive West Demolition Debris Fill Area and assigned SWMU designation AF.

This debris fill area was first identified as part of property transaction activities. Since identification, Groundwater Sciences Corporation (GSC), on behalf of IBM, performed an examination of a newly found historical aerial photograph, completed a field inspection of the debris area and conducted an interview with a person who had direct knowledge of the activities relating to the deposition of debris in this area. IBM was notified of GSC's findings on January 26, 1998. Information relating to this unit is discussed in the following paragraphs. In addition to the following discussion, as per Permit Condition III.C.2., a SWMU Assessment Report has been prepared and follows as an attachment to this letter.

Examination of the aerial photograph showed that B025 was newly constructed and that B005 North had not yet been constructed. Although the photograph is undated, based on the building configuration at the main plant site, a date of 1983 for this photo is determined to be reasonable. The Salt Barn is not present on this photograph and the area to the west of the Salt Barn is undeveloped and generally planted in crops. A single-lane, dead-end road is shown traversing this area and ends in a position coincident with the break in slope at the edge of the floodplain of Esopus Creek. A bright line, roughly 200 feet long, trending generally north-south was evident on the photograph at the terminus of the dead-end road. No other areas which may have been disposal areas were apparent on the aerial photograph.

Following examination of the aerial photograph, the linear bright spot at the terminus of the dead-end

road was examined in the field. This area is overgrown and can only be approached following trails from the west. Large pieces of concrete were observed in the overgrowth which had been placed on the slope between the higher area to the east and the floodplain of the Esopus Creek to the west. Sand and gravel, with occasional asphalt, were located in overlapping piles immediately to the east of the concrete at the edge of the slope.

Following the field inspection, Dick Collier, formerly of IBM, was interviewed. In the early 1980s, Mr. Collier was an engineer in Facility Services at Kingston. He said that the concrete located in the debris area was removed from the B025 area prior to the construction. According to Mr. Collier, this concrete consists of curbs, the foundation for the security guard shack, foundations for light poles, storm water catch basins, etc. The sand and gravel, with occasional asphalt, was also derived from demolition activities prior to the construction of B025. Mr. Collier indicated that IBM was careful to include only "clean" material consisting of concrete, and sand and gravel removed from former parking lot areas. This material was carefully placed in its current location along the edge of the floodplain.

After reviewing the information provided in this transmittal, should you have any questions please call Michele J. West at (914) 894-5536.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,
International Business Machines Corporation



William A. Federice
Manager, Real Estate Operations Support

WAF:db

Attachments: Location Map, Inactive West Demolition Debris Fill Area, SWMU AF
SWMU Assessment Report, Inactive West Demolition Debris Fill Area

cc w/att:

Rod Aldrich, NYSDEC Region 3

Gary Casper (additional transmittal copy to the Commissioner), NYSDEC Albany

cc w/o att:

James Reidy, USEPA

**SWMU Assessment Report
Inactive West Demolition Debris Fill Area
Solid Waste Management Unit AF**

TYPE OF UNIT

This unit is a small, inactive demolition debris disposal area.

LOCATION OF UNIT ON A TOPOGRAPHIC MAP

(Refer to attached Figure)

DIMENSIONS, CAPACITIES AND STRUCTURAL DESCRIPTIONS

The disposal site consists of an area of loosely piled, large pieces of concrete debris and an adjacent area of more or less continuous sand and gravel piles. The concrete debris area is approximately 150 feet long and 15 feet wide. The adjacent sand and gravel pile is more or less continuous and parallels the concrete debris area. It is approximately 150 feet long, 4 feet wide and 2 feet high.

FUNCTION OF UNIT

This unit is a small, inactive demolition debris disposal area.

DATE UNIT OPERATED

Demolition debris was placed in this unit over a relatively short period in 1982, prior to the construction of B025.

DESCRIPTION OF THE WASTES PLACED IN THE UNIT

The concrete debris consists of curbs, the foundation for the security guard shack, foundations for light poles, and storm water catch basins. This debris resulted from demolition activities prior to the construction of B025. The sand and gravel (with occasional asphalt) originated from the former parking lot where B025 was constructed. It was also derived from demolition activities prior to the construction of B025. A former IBM employee personally familiar with the deposition of these wastes indicated that IBM was careful to include only "clean" material consisting of concrete, and sand and gravel removed from former parking lot area. This material was carefully placed in its current location.

DESCRIPTION OF KNOWN RELEASES FROM THE UNIT

There are no known or suspected releases of hazardous wastes or hazardous constituents from this unit.

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SAMPLING RESULTS

Samples were not collected because there are no known or suspected releases of hazardous wastes or hazardous constituents from this small demolition debris area.

IS THIS UNIT A SIGNIFICANT SOURCE OF CONTAMINANT RELEASE?

There are no known or suspected releases of hazardous wastes or hazardous constituents from this unit.

February 9, 1998

