

FINAL INSPECTION REPORT FOR
CORRECTIVE ACTION PRIOR TO LOSS OF
INTERIM STATUS INSPECTION

THE AMPHENOL CORPORATION
BENDIX CONNECTOR OPERATIONS
SIDNEY, NEW YORK

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, D.C. 20460

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1.0 INTRODUCTION

CDM Federal Programs Corporation (FPC) received a Work Assignment No. R02013 from the U.S. Environmental Protection Agency (U.S. EPA) Region II (U.S. EPA Contract No. 68-W9-0002) to conduct corrective action prior to loss of interim status (CAPT LOIS) inspections in the State of New York. Versar, Inc., under subcontract to FPC, accepted this work assignment to prepare preliminary reports for each facility, conduct the inspections, and prepare final inspection reports for each facility. Versar started this work under TES III (Contract No. 68-01-7331, WA No. R02002) but did not finish because the contract expired. Versar completed the inspections under the old contract but prepared the reports under the new contract. Versar conducted 20 CAPT LOIS inspections.

The purpose of the CAPT LOIS inspection is to determine if releases have occurred at Resource Conservation and Recovery Act (RCRA) facilities and, if so, whether the releases have been adequately remedied. These inspections are conducted as part of the process for terminating interim status at RCRA facilities. The CAPT LOIS inspection is similar to a RCRA facility assessment (RFA) and consists of (1) a file review, similar to a preliminary review, and (2) a site visit, similar to a visual site inspection (VSI). However, unlike an RFA, a CAPT LOIS does not include sampling.

Versar conducted a CAPT LOIS inspection of the Amphenol Corporation - Bendix Connector Operations (Amphenol-Bendix) facility in Sidney, New York. Prior to conducting the site inspection, Versar completed a file review and prepared a Preliminary Report summarizing the facility operations and solid waste management units (SWMUs) at the facility.

The site inspection at the Amphenol-Bendix facility was conducted on June 7, 1989 by Bob Marbury and Ken Barry of Versar, Inc. Versar was accompanied by Mr. Wayne Barto of Amphenol. Mr. Henry Mitchell of Amphenol also provided additional information. The objective of the site

inspection was to verify information obtained in the file review, determine the status of known SWMUs, identify any new SWMUs and other areas of concern, and obtain evidence of release(s) from SWMUs or areas of concern. This inspection report describes the facility's operational and waste management practices, discusses the SWMUs, and provides recommendations for terminating the facility's interim status. Photographs taken during the site inspection are presented in the Attachment.

Pertinent facility information is provided below:

Facility Name: Amphenol Corporation-Bendix Connector Operations

U.S. EPA I.D. No.: NYD001827633

Address: 40-60 Delaware Street
Sidney, New York 13838-7395

Facility Contact: Henry J. Mitchell
Manager, Facilities Engineering

Telephone Number: (607) 563-5940 or (607) 563-5506

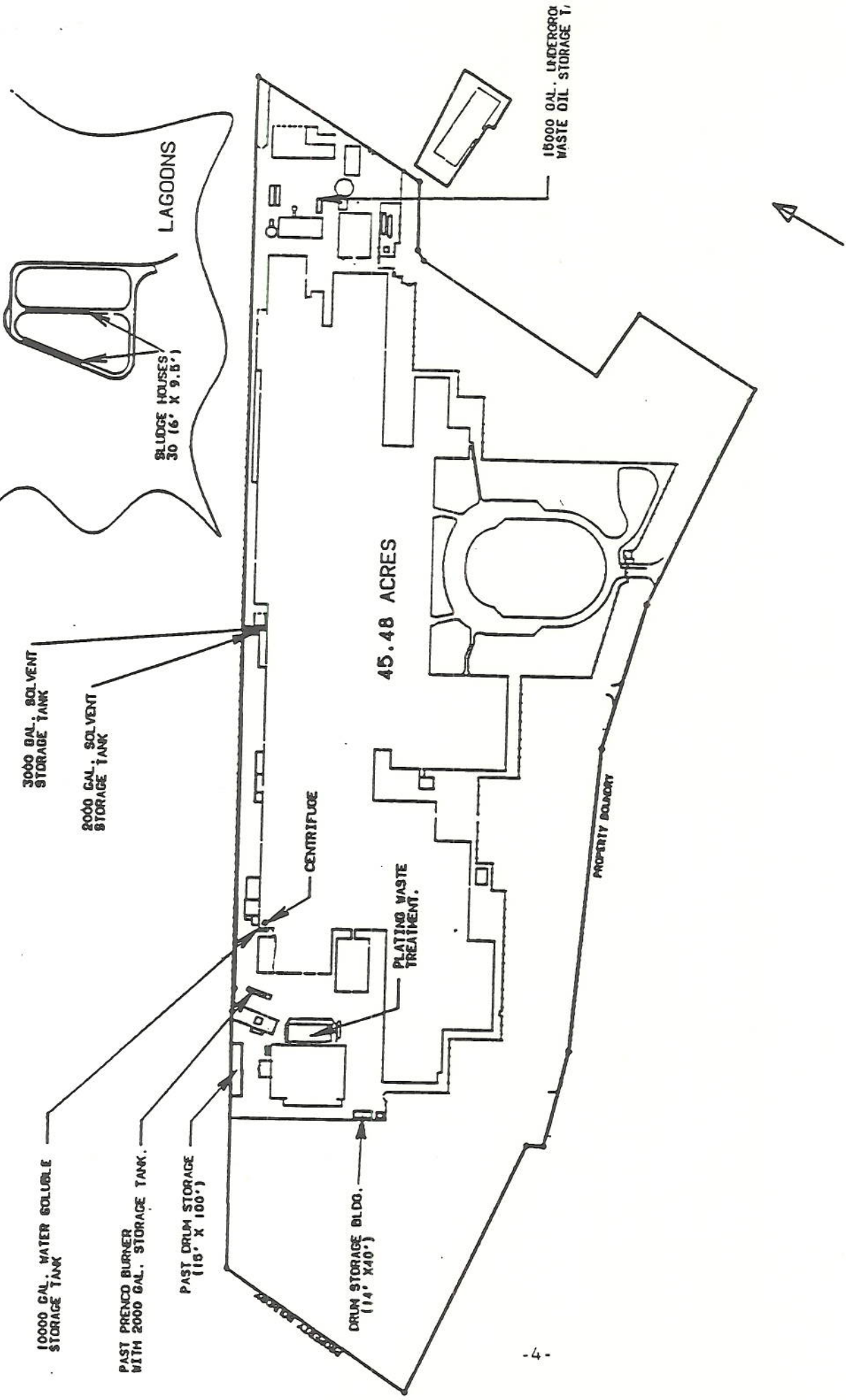
2.0 FACILITY DESCRIPTION

The Amphenol-Bendix facility, located at 40-60 Delaware Street, Sidney, New York, processes electrical components used primarily in the aircraft industry. The facility occupies approximately 45 acres, which includes the manufacturing and plating buildings.

Operations that generate hazardous wastes at this facility include plating of electrical components and degreasing operations. The plating operation produces wastes such as nickel cyanide strip, sulfurated potash solution, nickel niplex strip, and cyanide plating solution filters. Degreasing operations use primarily methylene chloride and trichloroethylene, (Amphenol, 1988). Water soluble waste and oil based wastes are stored temporarily in separate, above ground tanks. Waste solvents are now segregated and stored temporarily in 55-gallon drums before being transported offsite.

The solid waste management units (SWMUs) identified during the pre-site visit research and during the site visit are illustrated in Figure 1. The SWMUs are discussed in Section 3.0 of this report.

Amphenol submitted the container storage area and tank closure certification to the New York State Department of Environmental Conservation (NYSDEC) on January 31, 1989. The Certification of Closure was conducted by O'Brien and Gere Engineers, Inc. A letter dated March 17, 1989, from NYSDEC to Amphenol indicates that NYSDEC considers the facility officially closed and Amphenol is no longer required to operate as a treatment, storage, and disposal facility (TSDF). The closure was contingent upon Amphenol resealing the storage pad and repairing core sample locations. The repairs were scheduled to be conducted in July 1989.



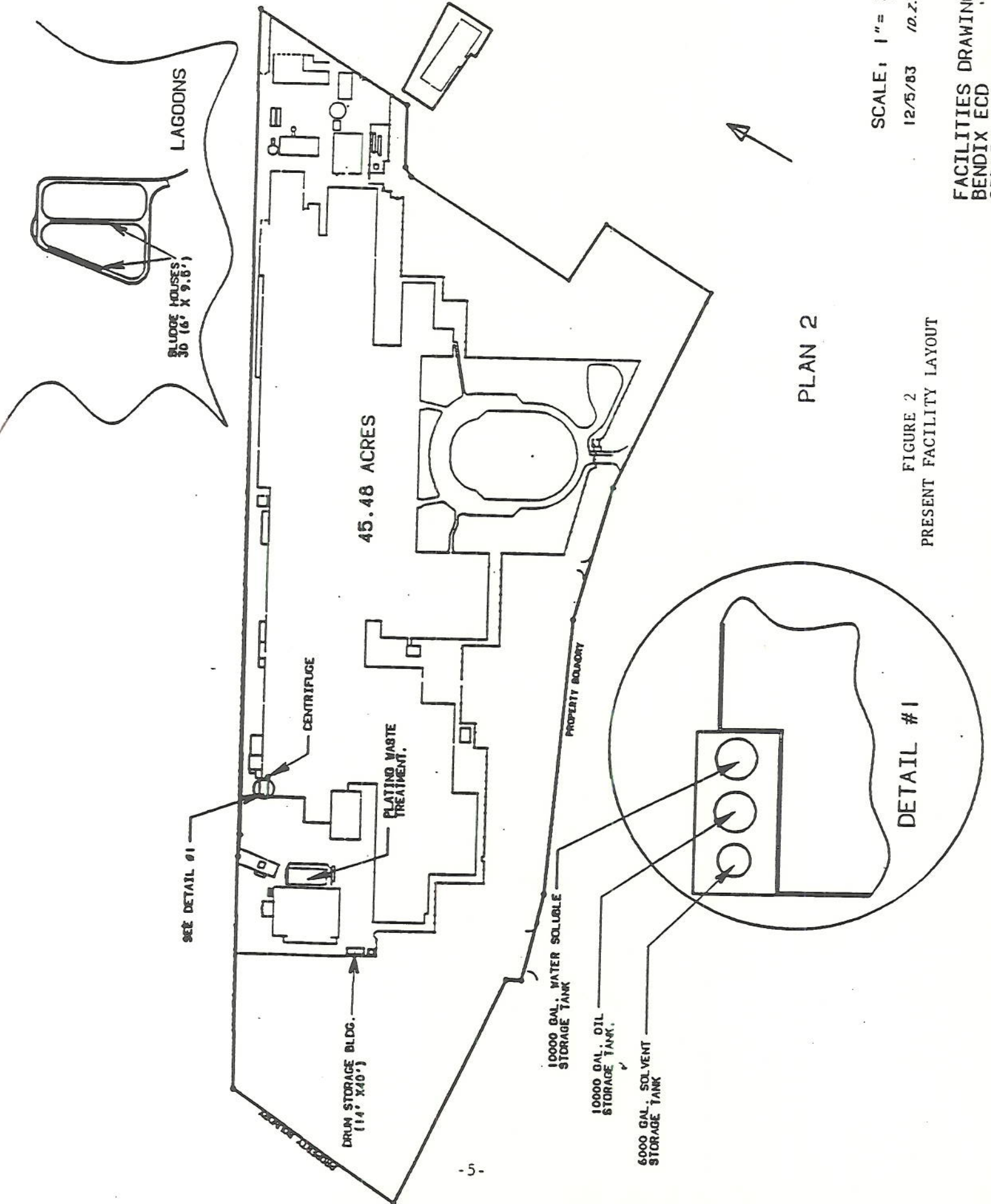
45.48 ACRES

PLAN I

SCALE: 1" = 300'
 12/5/83 (D.R.)

FIGURE 1
 PAST FACILITY LAYOUT

FACILITIES DRAWING
 BENDIX ECD
 STONEY NEW YORK



LAGOONS

SLUDGE HOUSES
30 (16' X 9.5')

45.48 ACRES

CENTRIFUGE

PLATING WASTE
TREATMENT

DRUM STORAGE BLDG.
(114' X 40')

10000 GAL. WATER SOLUBLE
STORAGE TANK

10000 GAL. OIL
STORAGE TANK

6000 GAL. SOLVENT
STORAGE TANK

PROPERTY BOUNDARY

PLAN 2

SCALE: 1" = 300'
12/5/83 (D.Z.)

FIGURE 2
PRESENT FACILITY LAYOUT

DETAIL #1

FACILITIES DRAWING
BENDIX ECD
STONEY NEW YORK

3.0 SOLID WASTE MANAGEMENT UNITS

Before the site visit, Versar identified eight solid waste management units (SWMUs) at the Amphenol-Bendix facility. The SWMUs include: a surface impoundment (considered a separate facility under U.S. EPA identification No. NY0981133184 and is not included in this investigation), storage tanks (active and inactive), incinerator, wastewater treatment plant, container storage areas (active and inactive), and a parking lot. The SWMUs are described in the following paragraphs.

3.1 Storage Tanks (Active)

Description

Two 10,000-gallon aboveground storage tanks and one 6,000-gallon aboveground storage tank are used for storing hazardous wastes generated from operations (see Attachment, Photograph 7). These tanks were pressure tested, as required for closure, and determined to be leak free. The tanks are in a semi-enclosed corrugated metal shed on a concrete floor with containment. They are situated at the northwest corner of the facility. The tanks were installed in 1984.

Status

Active for the accumulation of waste oils and solvents under the "90-day rule".

Waste Type

RCRA hazardous wastes include petroleum based oil, water soluble oil and spent solvent mixtures (chlorinated and non-chlorinated) that include methylene chloride, trichloroethylene, thinners, and mineral spirits.

Waste Management

The tanks are temporary storage units. Petroleum based oil wastes will be stored in one of the two 10,000-gallon tanks and water soluble wastes will be stored in the other. Amphenol had intended to use the

6,000-gallon tank for the temporary storage of spent solvents. However, Mr. Barto (Amphenol) indicated that the 6,000-gallon tank will not be used because Amphenol has elected to segregate waste solvents and temporarily store them in 55-gallon drums before being transported offsite (Amphenol Corporation, 1989). Under the "90-day rule", the wastes will be transported offsite in less than 90 days.

Known and Suspected Releases

No spills were reported to have occurred from these three tanks, nor is there evidence of a release. These tanks were recently pressure tested and release potential is minor. In the event a release occurred, the spill would be contained within the concrete pad area.

3.2 Storage Tanks (Inactive and Removed)

Description

One 15,000-gallon underground storage tank (UST), installed in 1981, has been removed. In addition, one 2,000-gallon aboveground tank and one 3,000-gallon aboveground tank were decommissioned.

The 15,000-gallon tank was situated at the northeastern part of the property and was used for storing waste oil. Amphenol intended to use the waste oil to fire a boiler for power; however, this proposition was not successful. This tank was removed in 1984. The location of the tank is shown in the Attachment, Photographs 1 and 1A. The 2,000-gallon and 3,000-gallon tanks were purchased in the early 1980s for storing waste solvents. The 2,000-gallon tank (which was associated with the incinerator) was decommissioned in 1982; then cleaned, cut, and sold as scrap metal. The 3,000-gallon tank was decommissioned and cleaned in 1984 but was kept for backup storage. The 3,000-gallon tank is bermed. The previous location of the 3,000-gallon tank is shown in the Attachment, Photograph 6.

Status

Inactive. The 3,000-gallon tank is available for use if necessary.

Waste Types

Waste solvents (chlorinated and non-chlorinated) were temporarily stored in the 2,000-gallon and 3,000-gallon tanks. Waste oil was stored temporarily in the 15,000-gallon tank.

Waste Management

These tanks have been removed from service.

Known and Suspected Releases

No spills were reported to have occurred from the 2,000-gallon and 3,000-gallon aboveground tanks; nor is there evidence of such a release. A release from the 15,000-gallon underground tank was documented when the tank was removed in 1984. As a result, eleven monitoring wells were installed to assess potential ground-water contamination. Mr. Barto informed Versar that a New York State Draft Consent Order is pending which pertains to the contamination in the vicinity of the removed 15,000-gallon tank. The effort will require a remedial investigation/feasibility study (RI/FS) approach with CERCLA protocol.

3.3 Incineration

Description

From about 1969 to 1982, waste oils and solvents were disposed of in a Prencro Pyro-Decomposition Incinerator, Model SF-4, which was in the northeastern part of the site.

Status

A closure plan was submitted to U.S. EPA on May 19, 1983. The closure plan was approved by U.S. EPA on September 30, 1983. The certified closure report was submitted on January 5, 1984.

Waste Type

Wastes incinerated included waste oils and solvents. More specific information was not available.

Waste Management

The closure plan was approved in 1983 and the incinerator was removed.

Known and Suspected Releases

No spills were reported in the vicinity of the incinerator, nor is there evidence of a release. Nevertheless, the ground water is contaminated in the vicinity of the former incinerator; however, the contamination is attributed to Amphenol coating the west parking lot with plating oil. A water well in the vicinity of the former incinerator is equipped with an air stripper (see Attachment, Photograph 8). This area of contamination is discussed further in Section 4.0.

3.4 Wastewater Treatment Plant

Description

The wastewater treatment plant treats waste water from plating operations and is regulated by SPDES discharge permit (No. 10Y0003824). This unit is exempt from RCRA regulation.

Status

Active.

Waste Types

Wastes include cyanide, chromium, and acid waste streams.

Waste Management

The system is used for cyanide waste destruction, chromium waste reduction, and acid neutralization prior to discharge. Water is tested for chlorinated solvents quarterly. The action level is 100 parts per billion (ppb) (typical levels are 2-3 ppb as reported by Mr. Barto) which if exceeded requires that Amphenol start a 3 day sampling program. Sludge from the waste water treatment plant (F006) is disposed through SCA (see Attachment, Photograph 9) every 6 to 8 weeks.

Known and Suspected Releases

No spills or releases were reported to have occurred as a result of the waste water treatment operations.

3.5 Container Storage Area

Description

The hazardous waste container storage building is situated in the western part of the site. The building dimensions are 14 feet by 40 feet by 10 feet tall. The building is constructed of concrete block (sides and rear) with a metal roof. Access is through one of three locked 7 foot chain link fence gates (see Attachment, Photographs 12 and 13). The storage area is divided by a dike into two separate storage areas, designated "A" and "B". Each storage area is equipped with a containment system and sump. This unit has been in operation since 1982.

Status

Active.

Waste Types

Waste types include waste solvents, plating wastes, plating filters, and cyanides. Bags of asbestos wastes were also in the storage area during the site visit.

Waste Management

Drums (55-gallon) of waste are stored temporarily in the container storage building pending transportation for offsite disposal. Drums are stacked on wooden pallets, two levels high as shown in the Attachment, Photograph 12. Storage area "B" is designated for incompatible cyanide waste streams.

Known and Suspected Releases

No spills or releases were reported to have occurred at the container storage building. Amphenol personnel reported no leaks or accumulation of liquids on the containment pad or sumps.

3.6 Former Container Storage Area

Description

The former hazardous waste container storage area was situated along the chain link fence west of the waste water treatment plant. The storage unit was approximately 15 feet by 100 feet open area (see Attachment, Photograph 10).

Status

Inactive. The new container storage area began operating in 1982.

Waste Types

Waste oils and waste solvents were stored in this area.

Waste Management

Fifty-five gallon drums were stacked two levels high, on pallets along the fence.

Known and Suspected Releases

No spills or releases were reported to have occurred at the old drum storage area. Vegetation adjacent to the area did not appear stressed.

3.7 West Parking Lot

Description

The west parking lot was oiled with spent plating oils during an unspecified period of time.

Status

Inactive. The west parking lot is no longer oiled with the spent oil.

Waste Types

Waste oils from plating operations were used in this area.

Waste Management

Waste oils were used to oil the parking lot in an effort to find an economical use for spent product.

Known and Suspected Releases

Soil and ground-water contamination in this area is the subject of an RI/FS-type effort under NYSDEC. A recovery well in the vicinity of the former incinerator is equipped with an air stripper. Mr. Barto reported that total volatile organic compounds are reduced from approximately 100-120 ppb to 2-3 ppb. The water is then used for non-contact cooling and plating operations. The remediation of the west parking lot is the subject of a Draft New York State Consent Order.

4.0 AREAS OF CONCERN

No areas of concern were identified at the Amphenol-Bendix facility.

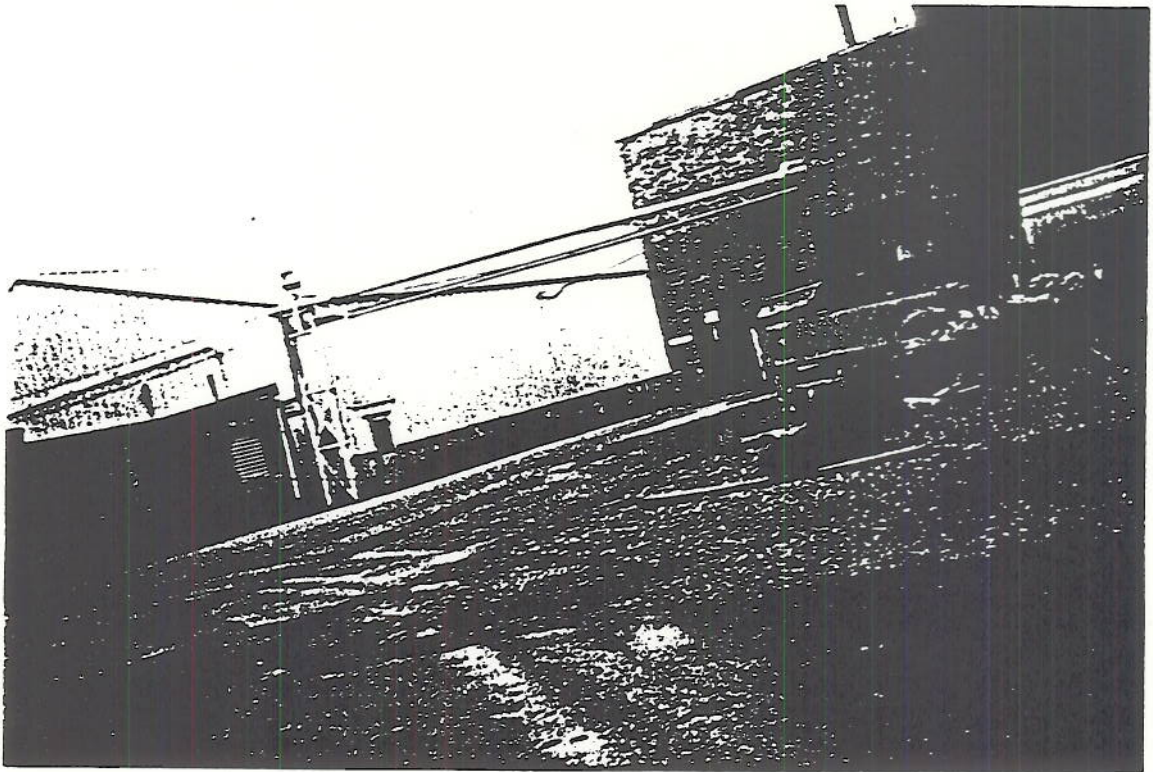
5.0 SUMMARY AND CONCLUSIONS

Seven SWMUs identified during the file review process were inspected during the site visit. Of these SWMUs, the former 15,000-gallon UST, and the west parking lot area are known to have released contaminants to the environment. The units from which releases have occurred are treated as separate units by NYSDEC. Remediation will be required by NYSDEC under a Consent Order. NYSDEC has approved closure of the main facility. Generally, the satellite accumulation areas have restricted access, adequate spill containment, and appear to be structurally sound.

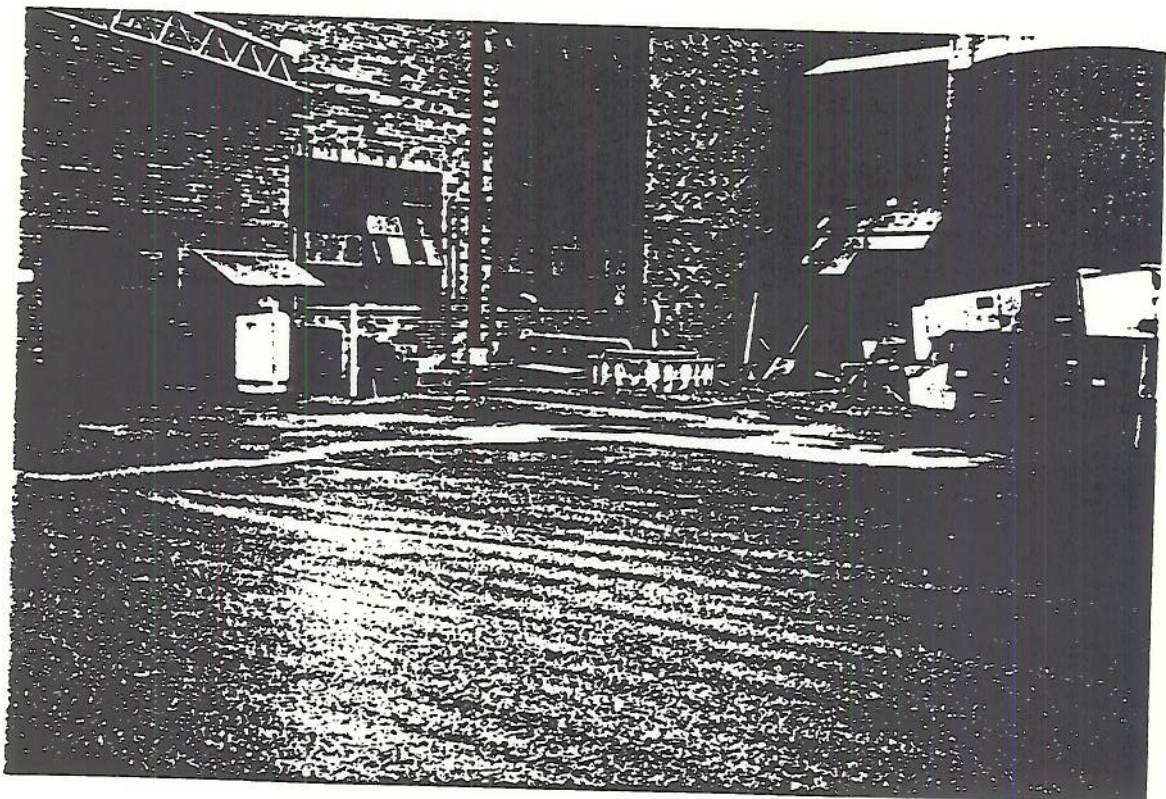
6.0 REFERENCES

- Amphenol Corporation, 1989a. Conversation with Mr. Wayne Barto of Amphenol during site visit, June 7, 1989.
- Amphenol Corporation, 1989b. Conversation with Mr. Henry Mitchell of Amphenol during site visit, June 7, 1989.
- Amphenol Corporation, 1989c. Letter to NYSDEC on tank and storage area closure certification. January 31, 1989.
- Amphenol Corporation, 1988. Closure Plan. Amphenol Corporation-Bendix Connector Operations, Sidney, New York. EPA I.D. #NYD001827633, September 1988.
- Amphenol Corporation, 1985a. "Response to SWMU Questionnaire of 1984. April 24, 1985.
- Amphenol Corporation, 1985b. Waste storage tanks closure plan status report. January 7, 1985.
- Bendix Corporation, 1984. Part A Application Form. March 23, 1984.
- NYSDEC, 1989a. Letter to Amphenol stating conditional closure approval. March 13, 1989.
- NYSDEC, 1989b. Letter from NYSDEC approving the closure of the main plant. January 31, 1989.
- NYSDEC, 1989c. Letter from NYSDEC verifying the closure of the main plant. February 1989.
- NYSDEC, 1985. Letter from NYSDEC with conditions for closure of the surface impoundments and sludge drying house. September 27, 1985.
- U.S. EPA, 1983. Letter from EPA approving incinerator closure, September 30, 1983.

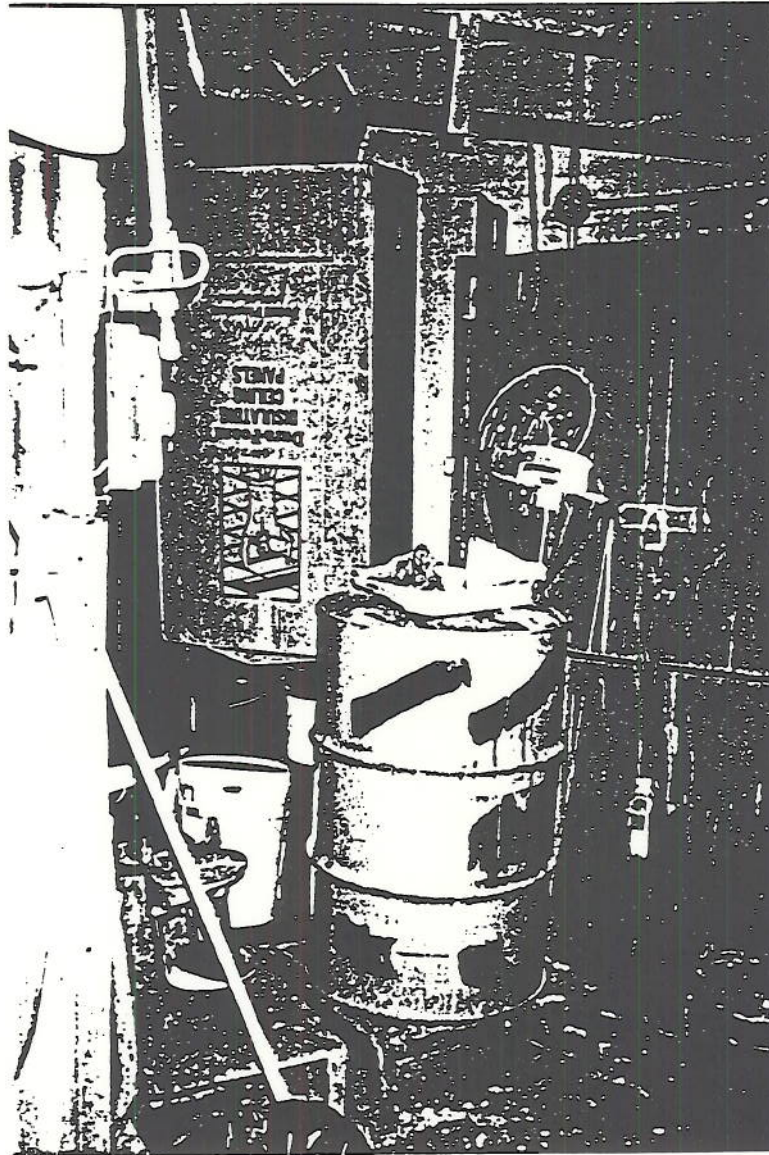
ATTACHMENT
Photographs Taken During the Site Inspection



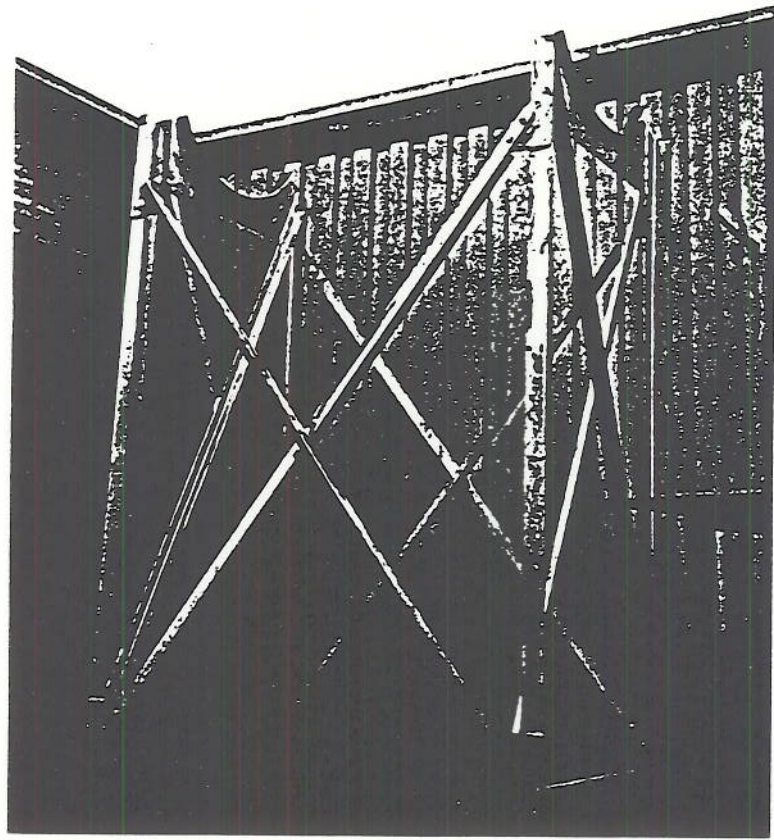
Photograph 1 - Former Location of a 15-000 Gallon
Underground Storage Tank



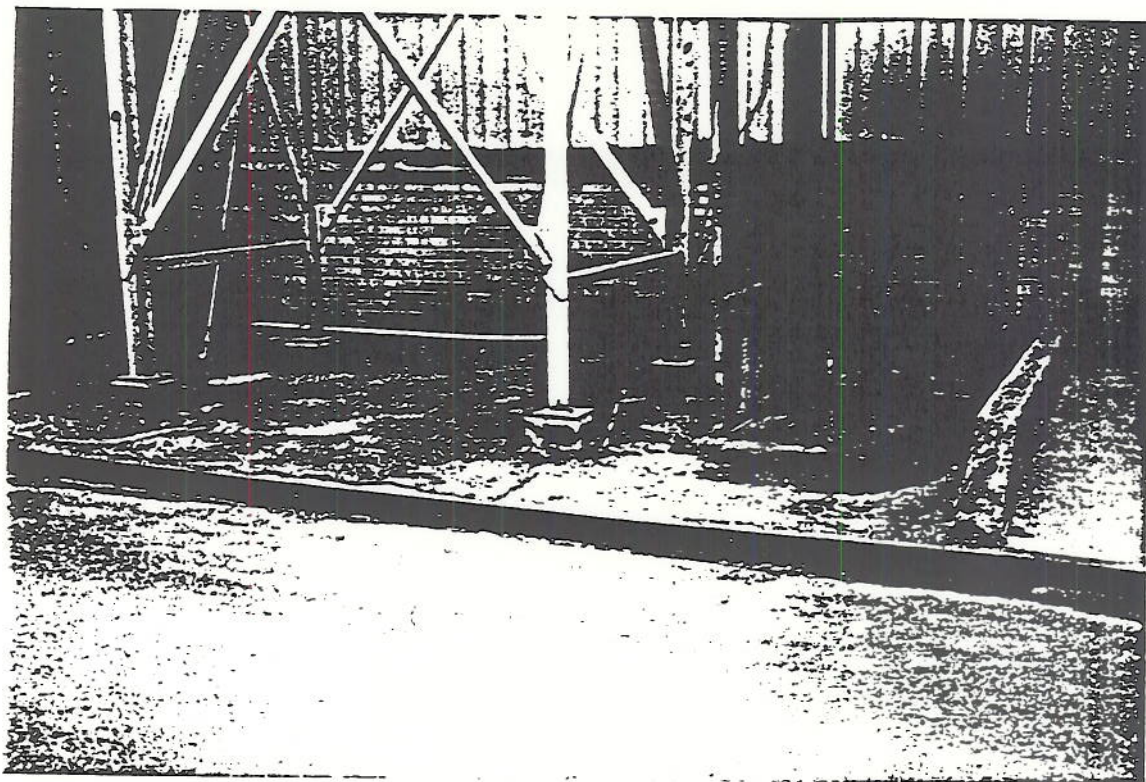
Photograph 1A - Former Location of a 15-000-Gallon
Underground Storage Tank



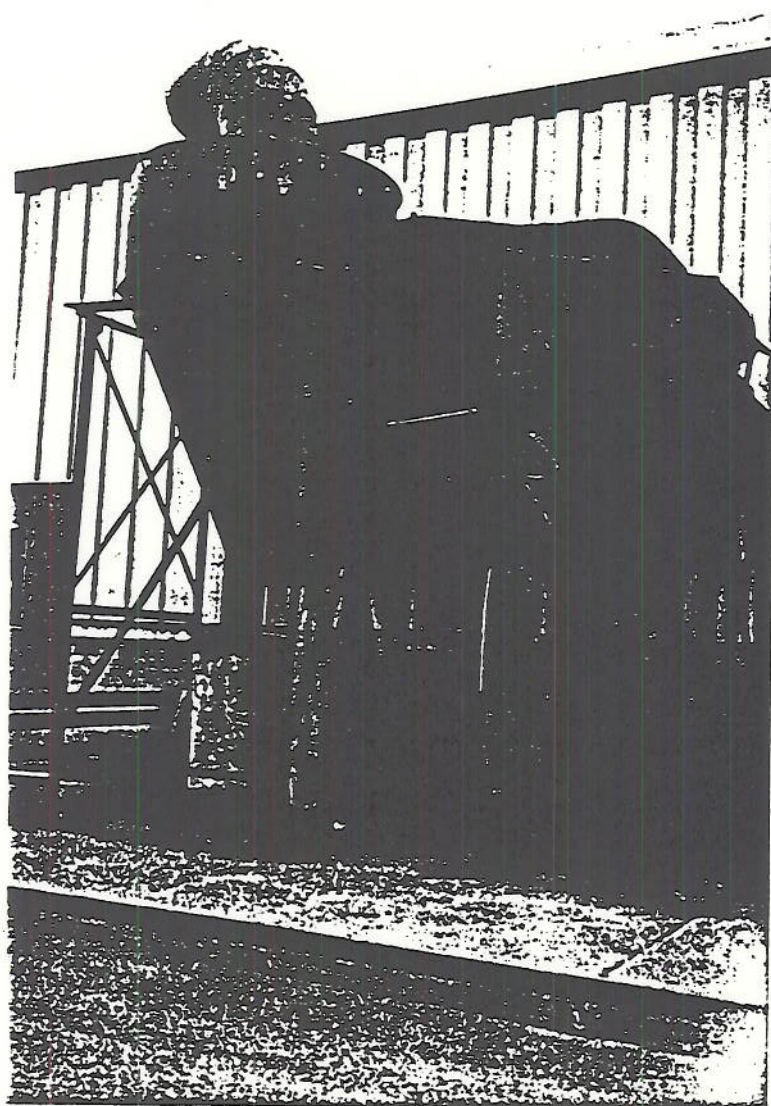
Photograph 2 - Satellite Accumulation Area in Old Coal Bin



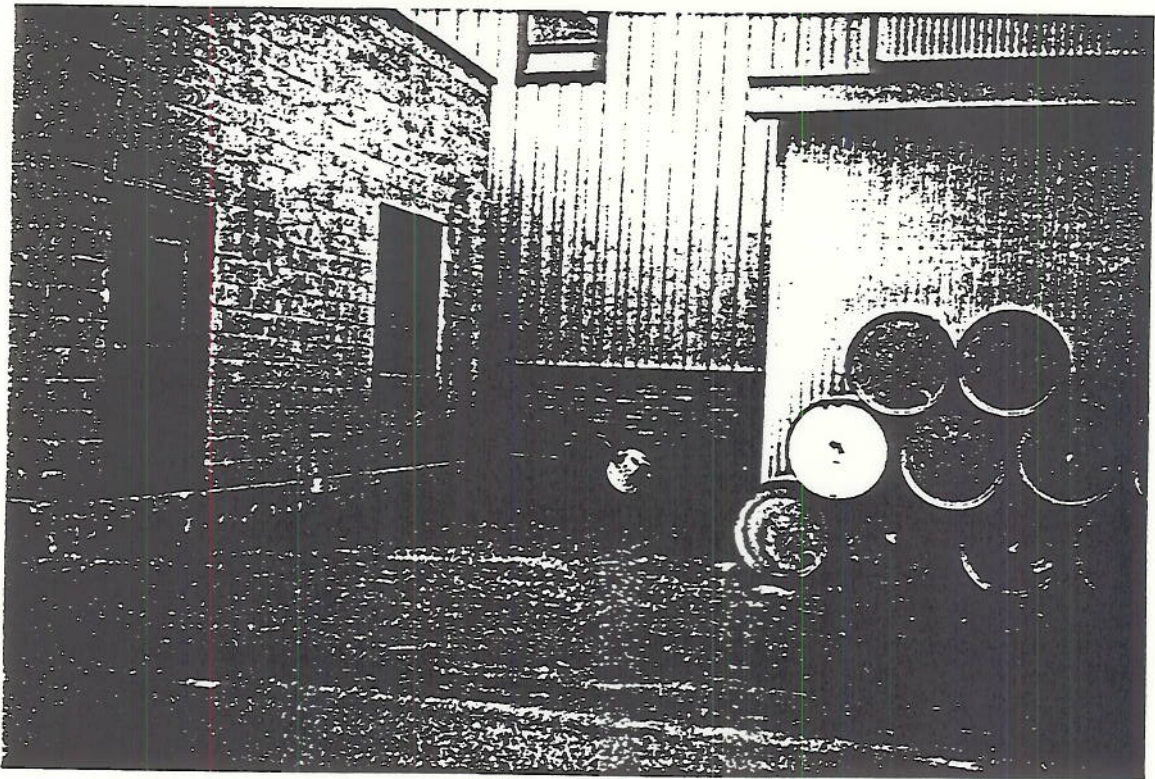
Photograph 3 - Former Location of 1,000-Gallon Virgin Oil Tank



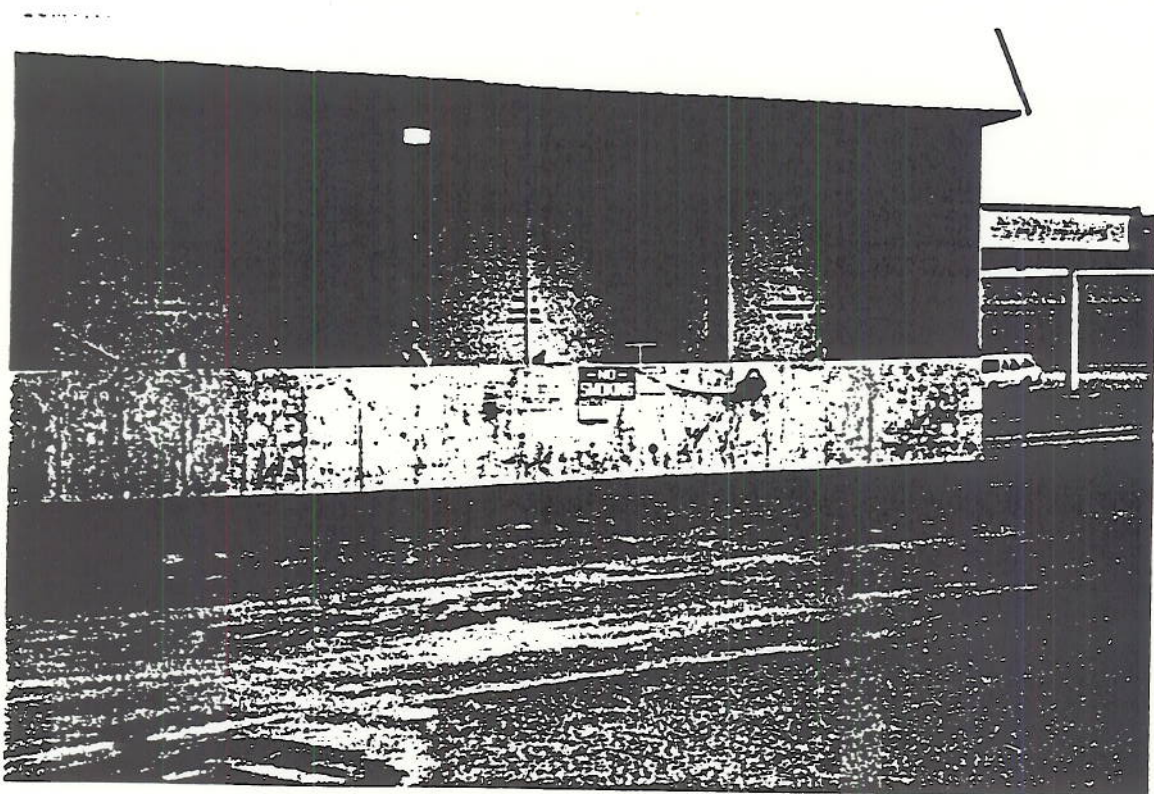
Photograph 4 - Former Location of 1,000-Gallon Virgin Oil Tank



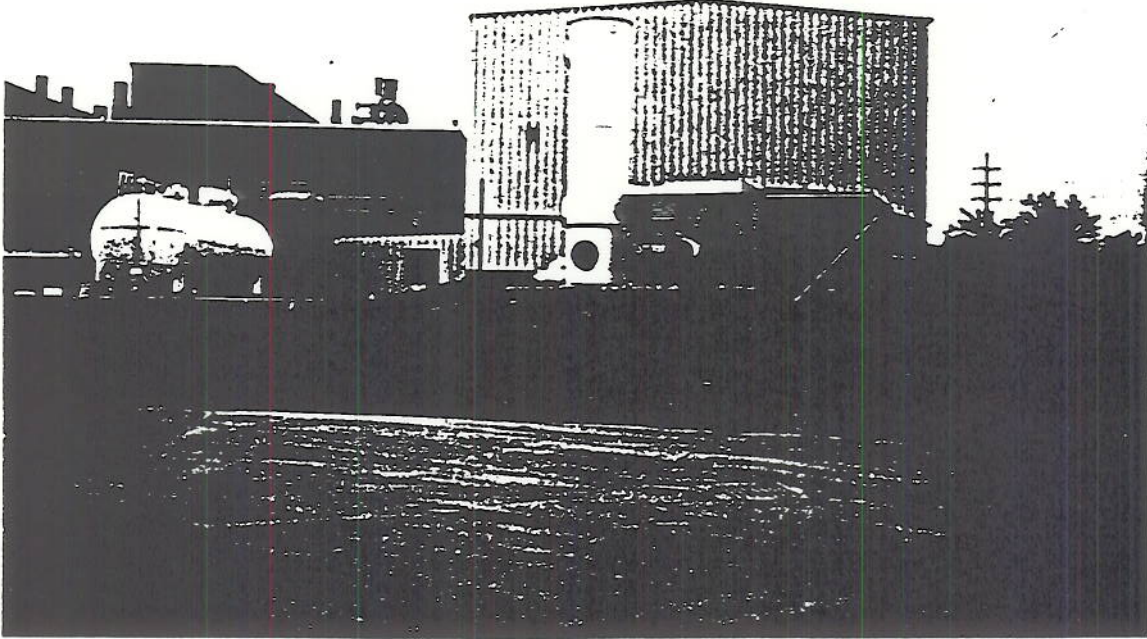
Photograph 5 - Inactive Cyclone



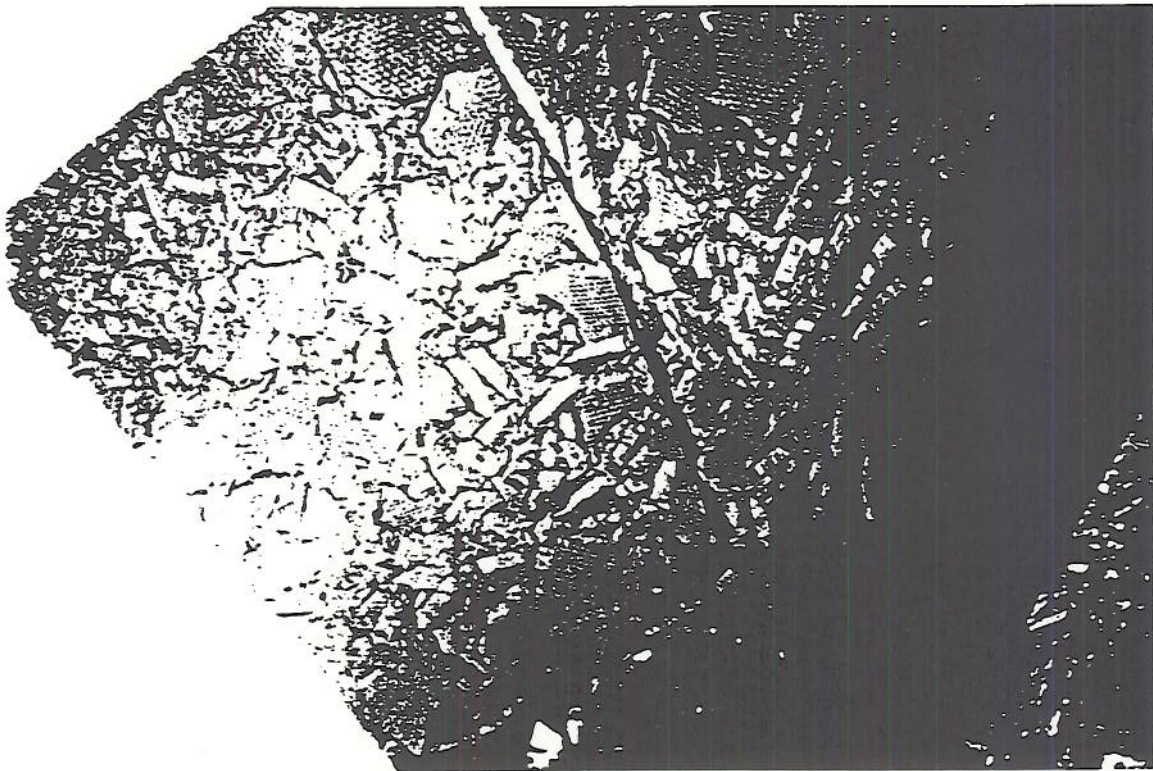
Photograph 6 - Former Location of 2,000- and 3,000-Gallon Tanks



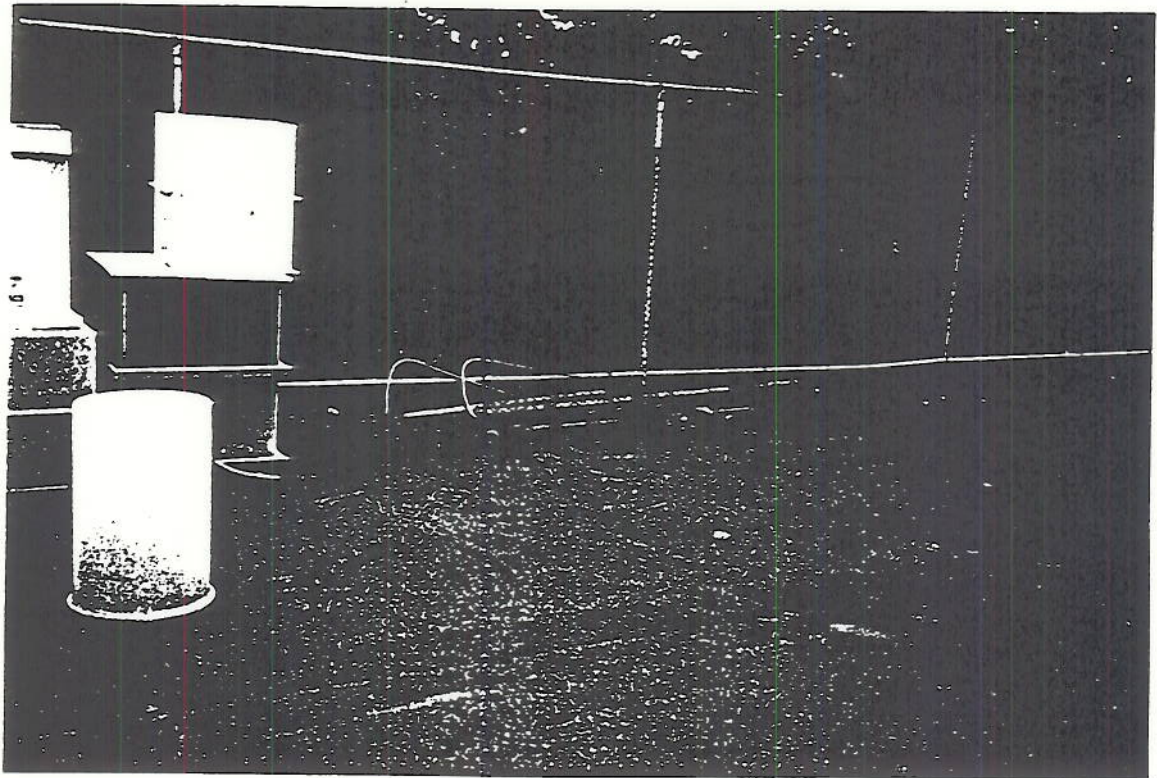
Photograph 7 - Two 10,000-Gallon and One 6,000-Gallon Tanks



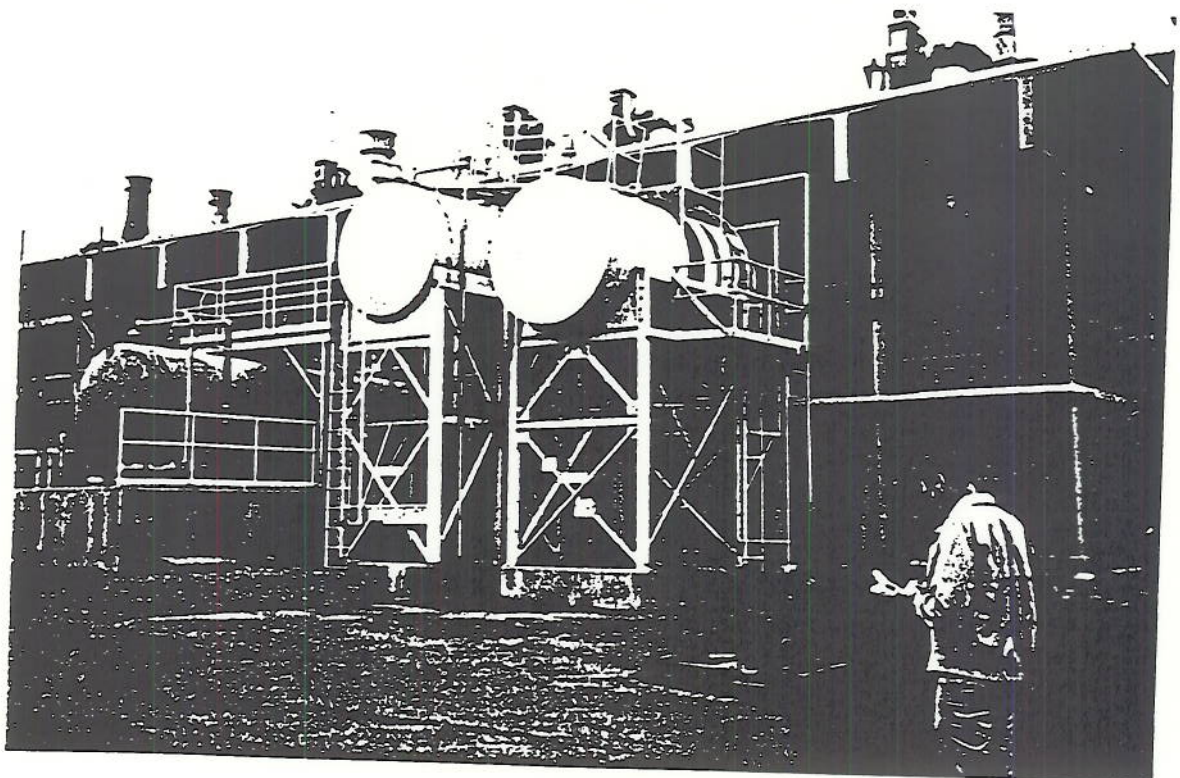
Photograph 8 - Air Stripper and Recovery Well
(Former Location of Incinerator)



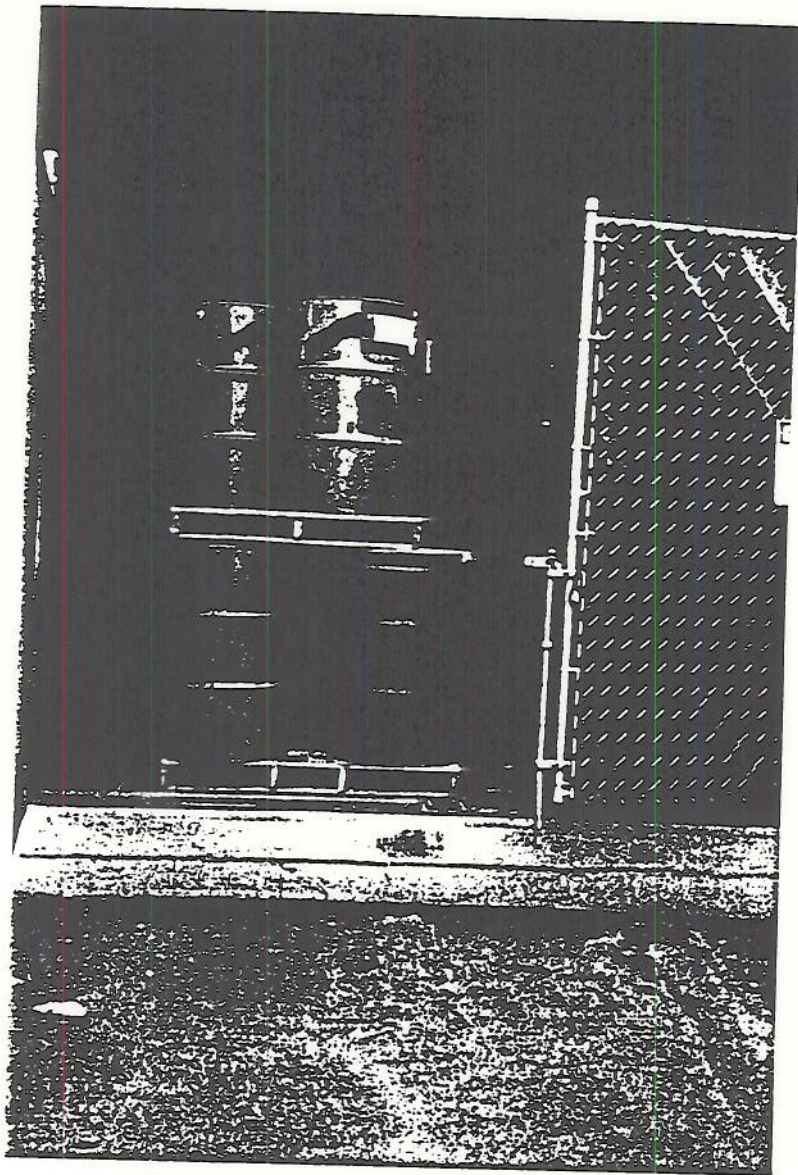
Photograph 9 - Sludge Dryer



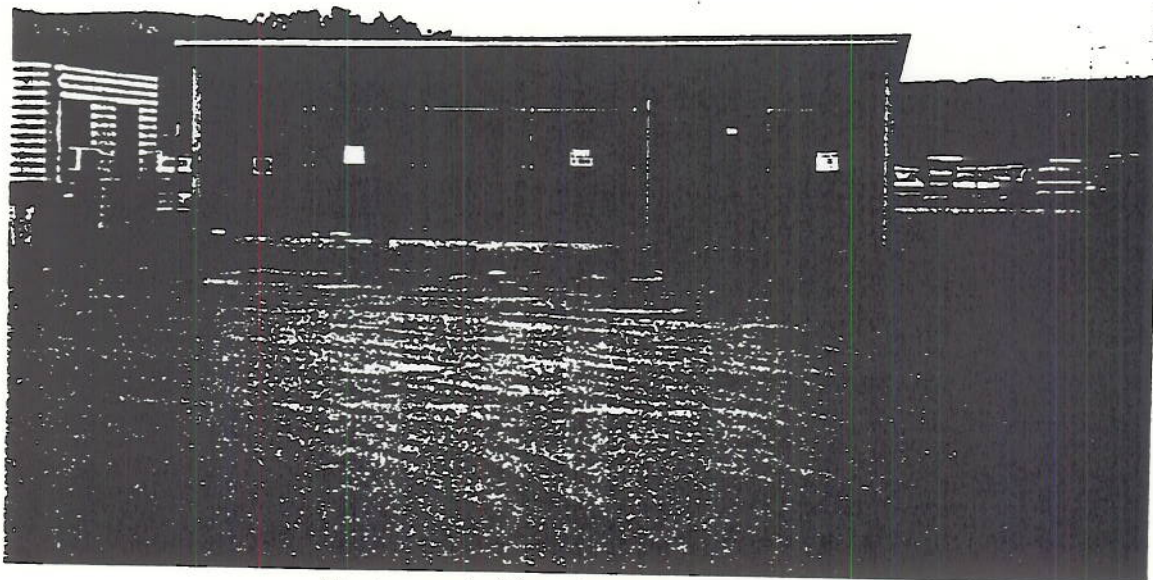
Photograph 10 - Old Drum Storage Area



Photograph 11 - Virgin Acid Storage Tanks



Photograph 12 - Drum Storage Area



Photograph 13 - Drum Storage Area