

New York State Department of Environmental Conservation  
50 Wolf Road, Albany, New York 12233 7010



Thomas C. Jorling  
Commissioner

August 10, 1992

Ms. Jill Naugle  
CDM Federal Programs Corporation  
107-F Corporate Boulevard  
South Plainfield, NJ 07080

Dear Ms. Naugle:

RE: PAS Site NYSDEC Registry # 738001

Enclosed please find a copy of the PAS Long Term Monitoring Analytical Data. Mr. Richard Ramon of the USEPA requested that this data be sent directly to you. I have also enclosed two sample location maps to aid in your interpretation of this data.

If you have any questions, please contact me at (518) 457-5677 or Mr. A.K. Gupta, the PAS Operations and Maintenance Project Manager for NYSDEC at (518) 457-0927.

Sincerely,

Robert Edwards  
Engineering Geologist 2  
Central Projects Section  
Bureau of Central Remedial Action  
Div. of Hazardous Waste Remediation

Enclosure

cc: with enclosure  
R. Ramon

without enclosure  
A. K. Gupta  
R. Lupe

AUG 12 1992



**New York State Department of Environmental Conservation**

**MEMORANDUM**

**TO:** Gerald Rider, Jr., Chief, O&M Section, BWRA  
**FROM:** Ray Lupe, Chief, Central Projects Section, BCRA  
**SUBJECT:** Long-Term Monitoring Wells at PAS (7-38-001)

**DATE:** MAR 4 1991

My staff has reviewed your proposal for changing the numbering system and decommissioning monitoring wells at the PAS site. They have also evaluated the condition and purpose of each existing monitoring well.

Their evaluation has determined that all of the W-series wells and all of the O-series wells may be decommissioned. These wells are generally in poor to useless condition and are either not used or not critical to the Long-Term Monitoring Program.

The existing numbering system of the monitoring wells now being used in the long-term monitoring system is straightforward. The first objective is to monitor the condition of the containment cell. The SWW-series wells are designed to do this. These wells are well-marked and painted yellow to distinguish them from the other wells. The second objective is to monitor the groundwater quality outside the containment cell. These wells are the L-series wells. They are well marked and painted red.

All wells are painted in primary colors and are easily distinguished.

There are several major reasons not to change the well numbering system. Some of these follow:

1. All reports associated with the installation of each series of monitoring wells identifies the wells uniquely, including surveyed location map.
2. Comprehensive maps locating and identifying each well have been supplied to the Responsible Parties (RP), EPA, EPA & RP consultants, and DEC O&M group. These maps CLEARLY identify all existing wells. Correspondence to all concerned repeatedly explained the purpose of each series of wells. If all wells were renumbered, confusion would reign (except within BCRA/CRPS) as to the purpose of any well.

If you wish, a contract will be let by BCRA/CRPS to decommission invalid wells.

RE/slj

bcc: A. K. Gupta  
 R. Lupe  
 R. McNamee  
 R. Edwards

MAR 5 1991



A.K.

New York State Department of Environmental Conservation

MEMORANDUM

**TO:** Ray Lupe, Chief, Central Projects Section, BERA A  
**FROM:** Gerald J. Rider, Jr., Chief, Operations & Maintenance Section, BCS  
**SUBJECT:** PAS Site #7-38-001 Groundwater Monitoring Wells  
**DATE:** FEB 28 1991

Based on discussions between our staffs it has come to my attention that the groundwater monitoring wells which were constructed at the PAS site have been installed at different times by different agencies and were, therefore, numbered differently. Since many of those investigation activities has been completed and the PRP's are performing a supplemental investigation which may involve additional wells it has been suggested that these monitoring wells be re-numbered utilizing one uniform system. This is a very good idea and a very important one.

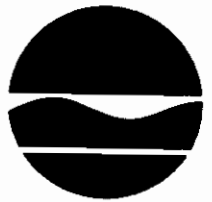
Also, as you know many of these wells are no longer required, and should be de-commissioned. Therefore, I am requesting that your staff identify the wells which are required to be de-commissioned and prepare a consolidated new well ID numbering system for the remaining wells. A conversion table and map will be necessary and can be included in both the PRP report and URS's future reports. We will then pursue decommissioning of the wells. We believe that this will eliminate any future confusion.

If you have any questions, or need assistance, please call me or A. K. Gupta at 7-0927.

cc: R. McNamee  
R. Edwards

a:grmonwll.pas:AKG:GR:et

Gupta



Thomas C. Jorling  
Commissioner

New York State Department of Environmental Conservation  
50 Wolf Road, Albany, New York 12233

October 23, 1992

Mr. Richard Ramon, P.E.  
Project Coordinator  
Western New York Remedial Action Section  
New York/Caribbean Remedial Action Branch  
Emergency and Remedial Response Division  
United States Environmental Protection Agency  
26 Federal Plaza, Room 29-100  
New York, New York 10278

- 2 1992

Dear Mr. Ramon:

RE: Draft Site Summary Report PAS Oswego  
Supplemental Remedial Investigation/Feasibility Study

The following comments are based on the review of the  
above-referenced document by my staff and other NYSDEC quality divisions.

The comments are:

1. Executive Summary page ii - The Record of Decision required installation of a impermeable cap, perimeter slurry wall, groundwater and leachate collection system, on-site groundwater and leachate treatment and a groundwater monitoring program. Off-site disposal of leachate is only to occur until the on-site treatment system is operational. To eliminate on-site treatment of leachate would require reopening the Record of Decision.
2. Page 4-3 - It is unlikely that White Creek represents a hydraulic boundary to the migration of contaminants within the overburden aquifer. White Creek is only 1-3 feet deep at most locations on-site. The saturated thickness of the overburden is often in excess of 20-30 feet. It is doubtful that a contaminant plume would be effected by White Creek. It would be more accurate to state that contaminant migration is retarded due to the low hydraulic conductivity of the tills which compose the overburden. White Creek could be correctly called a barrier to surface runoff from the site.
3. When will the evaluation of the integrity of the slurry wall be addressed? This evaluation is objective #2 of the SRI and

is critical to the evaluation of the entire remedial program performed at the site. Several USEPA documents claim that the integrity of the slurry wall has been compromised. This evaluation should not be delayed.

4. Page 6-6 - Geraghty and Miller, Inc. claim that the hydrogeologic data compiled to date is not adequate to perform this evaluation. However, OBG has had continuous level recorders in operation for several leachate removal events. There should be data available to perform an evaluation at this time. The text on page 6-6 suggests that this evaluation will not even begin until after February, 1993. Please advise us of the status of this evaluation.
5. Figure 3-2 - Monitoring Well I.D. #W-9 has been decommissioned and no longer exists. This well is also shown on Figures 4-1, 4-2, 4-3, 4-4, 5-1 and 5-2.
6. Figure 4-2 - Potentiometric surface line 262 ft. is not drawn correctly.
7. Page 5-9 - Shallow water-table monitoring wells do exist north of White Creek (05-1 and 05-3). These wells currently are only sampled every 5 years in accordance with the existing LTM plan. If there is a question or concern about contaminant migration north of White Creek, these wells are available for sampling and analysis.
8. A single monitoring well (M-23) may not be enough to accurately assess downgradient conditions within the bedrock aquifer. Well M-21 has contaminant levels almost identical to those found in LR-8, which is close to the northern edge of the containment cell. Unlike the overburden which has a northwest groundwater flow direction, the bedrock groundwater flow direction may be more to the north than the northwest. This could account for the similarities in contaminants and concentrations in monitoring wells M-21 and LR-8. M-23 is to the northwest of the site and may not be intercepting groundwater flow from the site.

Additional bedrock wells (OD-3 and OD-4) exist in the vicinity of M-21. Sampling and analysis of groundwater from these wells could aid in determining the extent of contamination proven to exist within the bedrock aquifer downgradient of the containment cell.

The following are comments from the Division of Fish and Wildlife:

1. A number of pages in Tables 5-1 through 5-5 incorrectly list the concentration units for soil analysis results as ug/l.

2. Figure 5-3 should indicate a PCB concentration of 5,500 at sampling location 3 as reported in Table 5-33.
3. Appendix A, page 15 and figure 2. It is reported that the freshwater wetland was delineated by flagging the boundary in 421 locations, each of which was located and recorded by a surveyor. This level of effort was unnecessary since at least three-fourths of the wetland is off-site, and an exact location of the boundary in this area serves no useful purpose. The examination of existing aerial photographs followed by field verification should have been used to determine off-site wetland areas. Resources expended for the delineation would have been better utilized in a more quantitative ecological evaluation of the site.
4. Summary tables should be included in the report that list only contaminants that were detected in each of the sampled media along with their concentrations. This will simplify reading of the report.
5. Appendix A, page 44. It is stated that DEC Division of Fish and Wildlife sediment criteria is being developed and is not appropriate for use at this time. The Sediment Criteria document, although currently undergoing revision, was finalized in 1989. It presents guidance values used by the Division of Fish and Wildlife, and it should be included in Table 3 and should be utilized in the evaluation of sediment analysis results.
6. Pages 5-17, 5-18. Evaluating sediment inorganic contamination by comparison to published soil element concentration ranges for the Eastern United States is not an acceptable method. More meaningful is a comparison to upstream, background sediment concentrations. Analytical results should be evaluated using data from locations 1 and 2, and using the DEC Division of Fish and Wildlife Sediment Criteria document.
7. The integrity of the slurry wall was not appraised in the report. It is stated that this will be accomplished when more hydrogeologic data become available. Nonetheless, the groundwater results indicate significant contamination outside the wall. Since soil contamination downgradient of the wall seems limited, the integrity of the wall is in question.

At present there are elevated levels of contaminants in the wetland system attributable to the site. Based on the limited data currently available, a serious impact to biota may not exist at this time. However, some measure of source control remediation will be necessary to preclude continued

loading and more significant impacts to the ecosystem.

If you have any questions on the above comments, please call Robert Edwards, of my staff, at (518) 457-5677.

Sincerely,

A handwritten signature in black ink, appearing to read "Raymond E. Lupe". The signature is written in a cursive style with a long horizontal stroke extending to the right.

Raymond E. Lupe  
Chief

Central Projects Section  
Bureau of Central Remedial Action  
Div. of Hazardous Waste Remediation

BE/slj

bcc: S. Hammond  
R. Edwards  
A.K. Gupta  
R. Koeppicus  
File

**New York State Department of Environmental Conservation****MEMORANDUM**

**TO:** A.K. Gupta, Bureau of Construction Services, DHWR  
**FROM:** Bob Edwards, Bureau of Central Remedial Action, DHWR  
**SUBJECT:** GROUNDWATER SAMPLING AT PAS SITE

**DATE:** NOV 8 1991

I have been informed that Geraghty and Miller, Inc. will be at the PAS site on November 13 and 14 to sample the new bedrock monitoring wells. These monitoring wells were installed as part of the Supplemental Remedial Investigation being performed by Geraghty and Miller.

Please inform URS, Inc. that Geraghty and Miller personnel are expected on site the above dates.

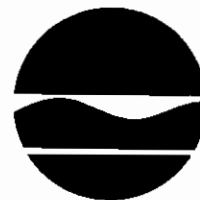
If you need further information, please call me at 7-5677.

BE/dd  
ground.doc



**New York State Department of Environmental Conservation**  
50 Wolf Road, Albany, New York 12233

May 28, 1991



**Thomas C. Jorling**  
Commissioner

Mr. Charlie Reith  
O'Brien & Gere Engineers  
P.O. Box 4873  
Syracuse, New York 13221

Dear Mr. Reith:

Re: Site No. 738001  
Pollution Abatement Services

Per your request on May 21, 1991, the copies of the following are attached:

1. Statement of Leachate Disposal (December 1986 to June 1990);
2. Leachate Analytical Data from 1985 report;
3. Leachate Analytical Data from 1988 bid documents;
4. Leachate Analytical Data from O&M Manual;
5. Leachate Analytical Data from LCW-2 - November 1989;
6. Leachate Analytical Data for November 1990 sampling.

Please note that about 50,000 gallons of leachate was hauled to Frontier Chemical during May 1991.

If you have any questions, please call me at (518) 457-0927.

Sincerely,

A. K. Gupta, P.E.  
Environmental Engineer 2  
Operation & Maintenance Section  
Bureau of Construction Services  
Division of Hazardous Waste Remediation

Enclosure  
bcc: R. Lupe  
C. Branagh  
G. Rider  
a:creith.ltr



## New York State Department of Environmental Conservation

### MEMORANDUM

**TO:** Paul Carella, Division of Fish and Wildlife  
**FROM:** Robert McNamee, Bureau of Central Remedial Action *RM*  
**SUBJECT:** Pollution Abatement Services Site (7-38-001): Supplemental Remedial Investigation and Feasibility Study  
**DATE:** March 18, 1991

On December 11, 1990, you submitted comments to this bureau regarding the Field Operations Plan for the Supplemental RI/FS at the PAS site in Oswego County. These comments were referred to the USEPA on January 9, 1991 for review and consideration.

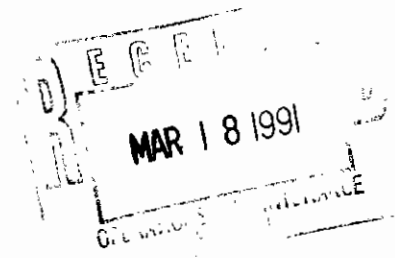
In a telephone conversation on March 15, 1991, Mr. Richard Ramon, EPA's project manager for this site, told me that the studies requested by the Division of Fish and Wildlife (DFW) are out of the scope of the current investigation. I informed Mr. Ramon that DFW concerns have been raised several times since the remediation of the site and have yet to be satisfactorily addressed. I suggest that you call him directly to determine if there is a way to incorporate DFW concerns in the forthcoming field investigation. He may be reached at 212/264-1336.

If you have any questions, you may reach me at extension 7-5677.

**NOTE:** In November 1988, the Central Projects Section installed a series of groundwater monitoring wells to complete a long-term monitoring network. The attached Long-term Monitoring Plan was initiated in November 1989 to monitor groundwater, surface water, and sediments in and around the site. Included in the attachment are the analytical results from the first two rounds of surface water and sediment sampling (11/89 and 11/90) for your reference. The plan is now being implemented by the Operation and Maintenance Section of the Bureau of Construction Services. Any comments you may have regarding the plan may be directed to Mr. A. K. Gupta.

Attachment

cc: A. K. Gupta  
R. Lupe





New York State Department of Environmental Conservation

MEMORANDUM

*SB Hammond*

TO: Michael J. O'Toole, Director, Div. of Haz. Waste Remediation  
FROM: Stephen B. Hammond, Director, Bureau of Central Remedial Action  
SUBJECT: Pollution Abatement Services Site (7-38-001), Oswego County

DATE: March 13, 1991

Attached for your signature is the request for Final Approval for the abandonment of groundwater monitoring wells at the Pollution Abatement Services site in the city of Oswego, Oswego County. The memorandum provides a clear understanding of the intent and function of the Purchase Order Contract. Based on this information, the Bureau recommends that you approve the contract and sign the attached memorandum.

Attachment



New York State Department of Environmental Conservation

MEMORANDUM

TO: Richard R. Lynch, Director, Division of Fiscal Management  
FROM: Michael J. O'Toole, Director, Division of Hazardous Waste Remediation  
SUBJECT: Pollution Abatement Services Site (7-38-001), Oswego County  
Final Approval for Abandonment of Groundwater Monitoring Wells  
DATE:

TYPE OF CONTRACT:

Purchase Order for services by American Auger and Ditching Co., Inc.

FUND NAME AND COST CENTER:

Fund Name: 1986 State Environmental Quality Bond Act

Cost Center: To be assigned

CONTRACT AMOUNT AND CONTRACT PERIOD:

Contract Bid Price: \$4,500.00

Contract Period: 90 days

GENERAL DISCUSSION AND JUSTIFICATION:

The Pollution Abatement Services site has been remediated as per the Record of Decision signed by EPA Administrator Lee Thomas on June 6, 1984. Following remediation, contaminated soils and groundwater have been found outside of the containment area. It has been documented that some contaminated soils were not encapsulated during the construction of a slurry wall due to the physical constraints of the site. The Responsible Parties are currently finalizing work plans to implement a Supplemental Remedial Investigation to address residual contamination. Groundwater monitoring wells installed for the initial Phase I investigation were constructed of black iron pipe which has corroded and deteriorated, rendering the wells useless for analytical sampling. Several wells which were installed after construction of the containment cell have been found vandalized. Contaminants have been found in the upper bedrock aquifer in wells near the contained area. Several wells were constructed in the bedrock aquifer with open holes extending to depths of over 90 feet. To avoid contamination of the deeper bedrock zones, it is important to seal off these open holes from the upper bedrock flow regime.

Verbal quotes were received from three drilling firms to determine the reasonableness of the contract price:

March 11, 1991 Marcor of NY, Inc. \$7,750.00 by Mr. Chris Kohrt

March 8, 1991 Parratt-Wolff \$5,900.00 by Mr. Mike Ellingworth

March 5, 1991 American Auger & Ditching \$4,500.00 by Mr. Rocky Baye

It is recommended that American Auger and Ditching Co., Inc., which is a Woman-owned Business Enterprise and has offered a reasonable price quote for supplying the services needed to accomplish this work, be chosen.

ALTERNATIVES:

1. Rejection of the Purchase Order. Sealing and abandonment of these wells is necessary to avoid further public exposure and to avoid contamination of the deeper bedrock zones.
2. Failing to approve this Purchase Order would result in an undue delay in securing this hazardous waste site which is accessible to the public and is of great local concern.
3. The level of effort involved in completing this project does not justify tasking a standby consultant. It is also not feasible for the State to do this work on its own.

AFFIRMATIVE ACTION ISSUES:

A Woman-owned Business Enterprise has been chosen.

NYSDEC ORGANIZATIONAL UNITS AND/OR STATE AGENCIES INVOLVED:

Division of Hazardous Waste Remediation  
Bureau of Central Remedial Action

NYSDEC ATTORNEY AND POTENTIAL LEGAL ISSUES:

Meta Murray  
Robert Davies

OTHER INFORMATION:

None

cc: B. Moulhem

bcc: M. O'Toole (2)  
C. Goddard  
S. Hammond  
R. Lupe  
R. McNamee  
R. Edwards  
D. Norvik  
J. McKeon  
E. Califano



AN INTERNATIONAL PROFESSIONAL SERVICE ORGANIZATION

**URS CONSULTANTS, INC.**

282 DELAWARE AVENUE  
BUFFALO, NEW YORK 14202-1805  
(716) 856-5636  
FAX: (716) 856-2545

ALBANY  
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PHOENIX  
PORTLAND  
SAN ANTONIO  
SAN FRANCISCO  
WASHINGTON, D.C.

June 20, 1991

Mr. A. K. Gupta, P.E., Project Manager  
Bureau of Western Remedial Action  
Division of Hazardous Waste Remediation  
New York State Department of  
Environmental Conservation  
50 Wolf Road  
Albany, New York 12233-7010

RE: PAS SITE O & M - SITE NO. 7-38-001 (W.A. D002340-8)  
LEVEL OF EFFORT FOR MAINTENANCE OF WELL PUMPS

Dear Mr. Gupta:

In accordance with your request, the following summarizes the level of effort expended for the maintenance of the leachate collection well pumps.

Labor Classifications

<u>Activity</u>	<u>VII</u>	<u>V</u>	<u>IV</u>	<u>Total</u>
1. Obtain Subcontractor	7	12		19
2. Field Supervision/Coordination	2	2	16	20
3. Maintenance Report	<u>2</u>	<u>3</u>	<u>5</u>	<u>10</u>
TOTAL	11	17	21	49

1. Obtain Subcontractor

URS contacted numerous mechanical and plumbing contractors by telephone to establish a list of potential bidders. The scope of services was developed and telefaxed to interested contractors with a copy of the subcontract. Verbal and written bids were evaluated. The subcontract was awarded to Environmental Products & Services (EP&S), the lowest bidder, with Department approval.

2. Field Supervision/Coordinator

An engineer from URS drove to the PAS site on May 3, 1991 and supervised the subcontractor's work to ensure compliance with the subcontract. One pump from leachate collection well No. 2 was sent with EP&S for repair. The subcontractor cost, previously approved by the Department, was \$800.00 not including parts and labor for pump repair.

Mr. A. K. Gupta, P.E.  
June 20, 1991  
Page 2

3. Maintenance Report

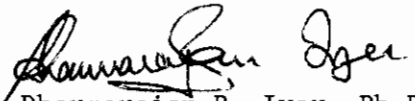
A report detailing the work performed on-site was prepared and submitted to NYSDEC on May 29, 1991.

We trust the information provided above is sufficient to assess the requirements for pump maintenance. Since this is the first such activity for the site, the level of effort for future on-site pump maintenance will be significantly lower, particularly if we can use the same subcontractor.

If you need additional information, please do not hesitate to contact me.

Very truly yours,

URS CONSULTANTS, INC.



Dharmarajan R. Iyer, Ph.D.  
Task Manager

DRI/ys  
Enc.

6-20-91.AKG

cc: P. David Smith - NYSDEC  
J. Gorton - URS  
J. Lysiak - URS  
File: 35236.00 (1000)

New York State Department of Environmental Conservation  
50 Wolf Road, Albany, New York 12233 - 7010

AKG → G Rider  
Please read  
track  
if in 30 days  
the program  
we will do  
it.



Thomas C. Jorling  
Commissioner

MAR 18 1991

March 18, 1991

Dr. Joseph Laforvara  
U.S. Environmental Protection Agency  
2890 Woodbridge Avenue  
Mail Stop 101  
Building 18  
Edison, New Jersey 08837-3679

RE: Pollution Abatement Services Site  
Oswego, New York (7-38-001)

Dear Dr. Laforvara: <sup>20</sup>

In 1988, the U.S. Environmental Protection Agency's Environmental Response Team (ERT) performed engineering studies at the Pollution Abatement Services site (PAS) in Oswego, New York. The purpose of the studies was to determine the feasibility of installing a semiautomatic treatment system for leachate generated within the containment area. At the completion of the studies, resultant wastes were staged on site. The staged materials include 55-gallon drums (17), 85-gallon overpack drums (4), 5-gallon drums (2), and used PVC hoses. In addition, there are 22 5-gallon drums of pure hydrochloric acid. All of these items remain on site. I have enclosed a copy of photographs of the subject materials.


The Operation and Maintenance Section of the Bureau of Construction Services is currently negotiating a contract for post-remedial construction and maintenance at PAS. Construction is to include improvements to the existing roads and paved areas. Removal of the staged drums and other materials would facilitate construction activities as well as eliminate the potential exposure to trespassers.

Please regard this letter as an official request to initiate removal of the staged materials at the PAS site. I understand that the project manager for these studies, Mr. Thomas Kady, is no longer with ERT.



Your anticipated cooperation in this matter is greatly appreciated. If you need any additional information, I may be reached at 518/457-5677.

Sincerely,

A handwritten signature in black ink, appearing to read "R. J. McNamee", written in a cursive style.

Robert J. McNamee  
Senior Engineering Geologist  
Bureau of Central Remedial Action  
Division of Hazardous Waste Remediation

Attachment

bcc: S. Hammond  
R. Lupe  
R. Edwards  
R. Brazell, R-7  
G. Rider  
A. Rockmore



AK

J (12-75)



**New York State Department of Environmental Conservation**

**MEMORANDUM**

**TO:** Lawrence Nadler, P.E., Chief, Determination and Compliance Section  
**FROM:** Gerald J. Rider, Jr., Chief, Operation and Maintenance Section  
**SUBJECT:** Waste Generator Annual Report for 1990, Pollution Abatement Services  
Site No. 7-38-001  
**DATE:** JUN 21 1991

Attached are two copies of the above referenced report for the Pollution Abatement Services Site Leachate Collection System for 1990, in fulfillment of our "substantive technical requirements" pursuant to 6NYCRR Part 373-2.5(e).

If you should have any questions, please contact me or A.K. Gupta at 457-0927.

Attachments

cc: A. Gupta

a:nadler:AKG:GR:et

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME Pollution Abatement Services

EPA ID NO. N Y D 0 0 0 5 1 1 6 1 9



U.S. ENVIRONMENTAL PROTECTION AGENCY  
1990 NYS DEC  
1989 Hazardous Waste Report

FORM  
IC

IDENTIFICATION AND CERTIFICATION

INSTRUCTIONS: Read the detailed instructions beginning on page 7 of the 1989 Hazardous Waste Report booklet before completing this form.

SEC. I Site name and location address. Complete items A through H. Check the box  in items A, B, D, E, F, G, and H if same as label; if different, enter corrections. If label is absent, enter information. Instruction page 7.

A. EPA ID No. Same as label <input type="checkbox"/> or <u>N Y D 0 0 0 5 1 1 6 1 9</u>		B. Site/company name Same as label <input type="checkbox"/> or <u>Pollution Abatement Services</u>	
C. Has the site name associated with this EPA ID changed since 1987? <input type="checkbox"/> 1 Yes <input checked="" type="checkbox"/> 2 No			
D. Street name and number. If not applicable, enter industrial park, building name or other physical location description. Same as label <input type="checkbox"/> or <u>East Seneca Street</u>			
E. City, town, village, etc. Same as label <input type="checkbox"/> or <u>Oswego</u>	F. County <u>Oswego</u>	G. State Same as label <input type="checkbox"/> or <u>(N Y)</u>	H. Zip Code Same as label <input type="checkbox"/> or <u>1 1 3 1 1 2 1 6</u>

SEC. II Mailing address of site. Instruction page 7.

A. Is the mailing address the same as the location address? <input type="checkbox"/> 1 Yes (SKIP TO SEC. III) <input checked="" type="checkbox"/> 2 No (COMPLETE SEC. II)	
B. Number and street name of mailing address <u>Operation &amp; Maintenance Section, NYSDEC, 50 Wolf Road, Room 222</u>	
C. City, town, village, etc. <u>Albany</u>	E. Zip Code <u>1 2 2 3 3 - 7 0 1 0</u>

SEC. III Name, title, and telephone number of the person who should be contacted if questions arise regarding this report. Instruction page 7.

A. Please print: Last name <u>Rider</u>	First name <u>Gerald</u>	M.I. <u>J.</u>	B. Title <u>Chief</u>	C. Telephone <u>5 1 8 4 5 7 - 0 9 2 7</u> Extension <u>    </u>
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SEC. IV Enter the Standard Industrial Classification (SIC) Code that describes the principal products, group of products, produced or distributed, or the services rendered at the site's physical location. Enter more than one SIC Code only if no one industry description includes the combined activities of the site. Instruction page 8.

A. <u>1 8 1 0 1 0 1 4</u>	B. <u>    </u>	C. <u>    </u>	D. <u>    </u>
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SEC. V I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. Number of form pages submitted Form IC <u>2</u> Form GM <u>1</u> Form WR <u>0</u> Form PS <u>0</u>			
B. Please print: Last name <u>Rider</u>	First name <u>Gerald</u>	M.I. <u>J.</u>	C. Title <u>Section Chief</u>
D. Signature <i>Gerald Rider</i>		E. Date of signature MO. <u>05</u> DAY <u>30</u> YR. <u>91</u>	

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME Pollution Abatement Services

EPA ID NO. N|Y|D|0|0|0|5|1|1|6|5|9



U.S. ENVIRONMENTAL PROTECTION AGENCY  
1990 NYS DEC  
1989 Hazardous Waste Report

FORM  
GM

WASTE GENERATION AND MANAGEMENT

**INSTRUCTIONS:** Read the detailed instructions beginning on page 14 of the 1989 Hazardous Waste Report booklet before completing this form.

Sec. I	A. Waste description Instruction Page 15 Leachate from remediated inactive hazardous waste site. Some of contaminants are known carcinogens. Toluene, xylenes, benzene, chlorobenzene, vinyl chloride, phenol etc. <u>TOC-1000 mg/g.</u>			
B. EPA hazardous waste code Page 15 <u>F 0 0 4 </u>		C. State hazardous waste code Page 16		
D. SIC code Page 16 <u>9 9 9 9 </u>	E. Source code Page 16 <u>A 5 2 </u>	F. Form code Page 16 <u>B 1 1 4 </u>	G. Origin Page 16 Code <u>3 </u> System type <u>M 1 3 2 </u>	
H. TRI constituent Page 17 <u>8 </u>	I. CAS numbers Page 17 1. _____ 2. _____ 3. _____ 4. _____ 5. _____			

Sec. II	A. Quantity generated in 1989 Instruction Page 17 <u>3 0 0 0 0 </u>	B. Quantity generated in 1990 Page 17 <u>1 5 9 0 0 0 </u>	C. UOM Page 18 <u>5 </u>	D. Density Page 18 <u>10 1  . 1 0 0 </u> <input type="checkbox"/> 1 lbs/gal <input checked="" type="checkbox"/> 2 kg	E. Was this waste treated, disposed or recycled on site or discharged to a sewer/POTW? Page 18 <input type="checkbox"/> 1 Yes (CONTINUE TO SYSTEM I) <input checked="" type="checkbox"/> 2 No (SKIP TO SEC. III)
SYSTEM 1 System type Page 18 <u>M </u>		Quantity treated, disposed or recycled in 1989 Page 18 _____		SYSTEM 2 System type Page 18 <u>M </u>	
		Quantity treated, disposed or recycled in 1989 Page 18 _____			

Sec. III	A. Was this waste shipped off site? Instruction Page 19 <input checked="" type="checkbox"/> 1 Yes (CONTINUE TO BOX B) <input type="checkbox"/> 2 No (SKIP TO SEC. IV)		
Site 1	B. EPA ID No. of facility to which waste was shipped Instruction Page 19 <u>N Y D 0 8 0 3 3 6 2 4 1 1 </u>	C. System type Page 19 <u>M 0 9 9 </u>	D. Total quantity shipped in 1989 1990 Page 19 <u>1 5 4 0 0 0 0 </u>
Site 2	<u>N Y D 0 4 3 8 1 5 7 0 3 </u>	<u>M 0 8 2 </u>	<u>1 5 0 0 0 0 </u>

Sec. IV	A. Waste minimization results in 1989 Instruction Page 20 <input type="checkbox"/> 1 Yes (CONTINUE TO BOX B) <input checked="" type="checkbox"/> 2 No (THIS FORM IS COMPLETE)			
B. Activity Page 21 <u>W </u> <u>W </u>	C. Other effects Page 21 <input type="checkbox"/> 1 Yes <input type="checkbox"/> 2 No	D. Quantity recycled in 1989 due to new activities Page 21 _____	E. Activity/Production Index Page 21 _____	F. Source Reduction Quantity Page 22 _____
<u>W </u> <u>W </u>				

Comments: The manifested (54,000 gal) was approximate quantity measured on PAS site. The more accurate quantity measured at the off-site disposal facility was 52,144 gal.

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Pollution Abatement Services

EPA ID NO. N.Y.D 000511659



U.S. ENVIRONMENTAL PROTECTION AGENCY  
1990 NYS DEC  
1989 Hazardous Waste Report

FORM

OI

OFF-SITE IDENTIFICATION

INSTRUCTIONS: Read the detailed instructions on the back of this page before completing this form.

Site 1	A. EPA ID No. of off-site installation or transporter <u>N Y D 0 4 3 8 1 5 7 0 3</u>	B. Name of off-site installation or transporter <u>Frontier Chemical Waste</u>
--------	---	---

C. Handler type (CHECK ALL THAT APPLY) <input type="checkbox"/> Generator <input checked="" type="checkbox"/> Transporter <input checked="" type="checkbox"/> TSDR	D. Address of off-site installation Street <u>4626 Royal Avenue</u> City <u>Niagara Falls</u> State <u>NY</u> Zip Code <u>14303</u>
---	---

Site 2	A. EPA ID No. of off-site installation or transporter <u>N Y D 9 8 0 7 6 1 1 9 1</u>	B. Name of off-site installation or transporter <u>Environmental Products and Services</u>
--------	---	---

C. Handler type (CHECK ALL THAT APPLY) <input type="checkbox"/> Generator <input checked="" type="checkbox"/> Transporter <input type="checkbox"/> TSDR	D. Address of off-site installation Street <u>P.O. Box 315</u> City <u>Syracuse</u> State <u>NY</u> Zip Code <u>13209</u>
--	---

Site 3	A. EPA ID No. of off-site installation or transporter <u>N Y D 0 8 0 3 3 6 2 4 1</u>	B. Name of off-site installation or transporter <u>Cecos International, Inc.</u>
--------	---	---

C. Handler type (CHECK ALL THAT APPLY) <input type="checkbox"/> Generator <input type="checkbox"/> Transporter <input checked="" type="checkbox"/> TSDR	D. Address of off-site installation Street <u>56th Street, Niagara Falls Blvd.</u> City <u>Niagara Falls</u> State <u>NY</u> Zip Code <u>14304</u>
--	--

Site 4	A. EPA ID No. of off-site installation or transporter _____	B. Name of off-site installation or transporter _____
--------	--	--

C. Handler type (CHECK ALL THAT APPLY) <input type="checkbox"/> Generator <input type="checkbox"/> Transporter <input type="checkbox"/> TSDR	D. Address of off-site installation Street _____ City _____ State _____ Zip Code _____
---	--

Site 5	A. EPA ID No. of off-site installation or transporter _____	B. Name of off-site installation or transporter _____
--------	--	--

C. Handler type (CHECK ALL THAT APPLY) <input type="checkbox"/> Generator <input type="checkbox"/> Transporter <input type="checkbox"/> TSDR	D. Address of off-site installation Street _____ City _____ State _____ Zip Code _____
---	--

Comments:



**New York State Department of Environmental Conservation**

**MEMORANDUM**

**TO:** James Moran, Chief, Technical Support Section  
**FROM:** Gerald J. Rider, Jr., Chief, Operation and Maintenance Section  
**SUBJECT:** Waste Generator Annual Reports for 1991

**DATE:** MAR 02 1992

Attached are the Waste Generator Annual Reports for 1991 pursuant to 6NYCRR Part 373-2.5(e) for the following sites:

<u>EPA ID #</u>	<u>SITE NAME</u>	<u>SITE #</u>
NYD000511659	Pollution Abatement Services Site	7-38-001
NYD000767657	Love Canal Site	9-32-020
NYD000512665	Kingsbury Landfill Site	5-58-008
NYD000512335	Dewey Loeffel Site	4-42-006

A copy of the Love Canal Waste Summary for 1991 is also attached for clarification.

If you should have any questions, please contact me or A. K. Gupta, of my staff, at 457-0927.

**Attachments**

- cc: E. Hamilton, Reg. 4
- D. Steenberg, Reg. 5
- C. Branagh, Reg. 7
- P. Buechi, Reg. 9
- A. Gupta
- J. Strang
- J. Spellman
- R. Lee
- B. Sadowski

a:nadler:AKG:GR:et

ATTACH SITE IDENTIFICATION LABEL OR ENTER BELOW. FOR ADDITIONAL SPACE USE COMMENTS BOX. DO NOT COPY FORM, CALL 518/457-3273 FOR COPIES.

SITE NAME P O L L U T I O N A B  
 A T E M E N T S E R V I C E  
 EPA ID No. N Y D O O O 5 1 1 6 5 9



U.S. ENVIRONMENTAL PROTECTION AGENCY

1991 Hazardous Waste Report

FORM  
IC

IDENTIFICATION AND CERTIFICATION

**INSTRUCTIONS:** Read the detailed instructions beginning on page 6 of the 1991 Hazardous Waste Report booklet before completing this form.

**SEC. I** Site name and location address. Complete items A through H. Check the box  in items A, C, E, F, G, and H if same as label; if different, enter corrections. If label is absent, enter information. Instruction page 6

A. EPA ID No. → NY D O O O 5 1 1 6 5 9 B. County → O S W E G O

C. Site/company name → P O L L U T I O N A B D. Has the site name with this EPA ID changed since 1989?  X

E. → E A S T S E N E C A S T R E E T

F. City, town, village, etc. → O S W E G O G. State → N Y H. Zip Code: → 1 3 1 2 6

**SEC. II** Mailing address of site. Instruction page 6

A. Is the mailing address the same as the location address? 1 Yes (SKIP TO SEC. III)  X 2 No (GO TO BOX B)

B. O & M S E C T I O N 5 0 W O L F R D R M 2 0 8

C. A L B A N Y D. State → N Y E. → 1 2 2 3 3 7 0 1 0

**SEC. III** Name, title, and telephone number of the person who should be contacted if questions arise regarding this report. Instruction page 6

A. Please print: Last name First name M.I. B. Title

R I D E R G E R A L D J S E C T I O N C H I E F

5 1 8 4 5 7 0 9 2 7

**SEC. IV** Enter the Standard Industrial Classification (SIC) Code that describes the principal products, group of products, produced or distributed, or the services rendered at the site's physical location. Enter more than one SIC Code only if no one industry description includes the combined activities of the site. Instruction page 7

A. 9 9 9 9 B. C. D.

**SEC. V** "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 under Section 3008 of the Resource Conservation and Recovery Act for submitting false information, including the possibility of fine and imprisonment for knowing violations."

A. R I D E R G E R A L D J. J R B. C H I E F

C. Signature *Gerald Rider* D. Date of signature 03 01 92



Sec. VI - Generator Status

EPA ID NO N Y D 0 0 0 5 1 1 6 5 9

- A. 1991 RCRA generator status  
(CHECK ONE BOX BELOW)
- 1 LQG
  - 2 SQG (SKIP TO SEC. VII)
  - 3 CESQG
  - 4 Non generator (CONTINUE TO BOX B)

- B. Reason for not generating  
(CHECK ALL THAT APPLY)
- 1 Never generated
  - 2 Out of business
  - 3 Only excluded or delisted waste
  - 4 Only non-hazardous waste
  - 5 Periodic or occasional generator
  - 6 Waste minimization activity
  - 7 Other (SPECIFY COMMENTS IN BOX BELOW)

Sec. VII - On-Site Waste Management Status

A. RCRA permitted or interim status storage Instruction page 10	B. RCRA permitted or interim status Page 10	C. RCRA-exempt treatment, disposal, or recycling Page 11
1	1	1

Sec. VIII - Waste Minimization Activity during 1990 or 1991

A. Did this site begin or expand a <u>source reduction</u> activity during 1990 or 1991? Instruction page 11	B. Did this site begin or expand a Page 12	C. Did this site systematically investigate opportunities Page 12
1 Yes <input checked="" type="checkbox"/> 2 No	1 Yes <input checked="" type="checkbox"/> 2 No	1 Yes <input checked="" type="checkbox"/> 2 No

D. Did any of the factors listed below delay or limit this site's ability to initiate new or additional source reduction activities in 1990 or 1991?  
Page 12: (CHECK BOX YES OR NO FOR EACH ITEM)

- a. Insufficient capital to install new source reduction equipment or implement new source reduction practices
- b. Lack of technical information on source reduction techniques applicable to the specific production processes
- c. Source reduction is not economically feasible: cost savings in waste management or production will not recover the capital investment
- d. Concern that product quality may decline as a result of source reduction
- e. Technical limitations of the production processes
- f. Permitting burdens
- g. Source reduction previously implemented - additional reduction does not appear to be technically feasible
- h. Source reduction previously implemented - additional reduction does not appear to be economically feasible
- i. Source reduction previously implemented - additional reduction does not appear to be feasible due to permitting requirements
- j. Other (SPECIFY COMMENTS IN BOX BELOW)

E. Did any of the factors listed below delay or limit this site's ability to initiate new or additional on-site or off-site recycling activities during 1990 or 1991?  
Page 12: (CHECK BOX YES OR NO FOR EACH ITEM)

- a. Insufficient capital to install new recycling equipment or implement new recycling practice
- b. Lack of technical information on recycling techniques applicable to this site's specific production processes
- c. Recycling is not economically feasible: cost savings in waste management or production will not recover the capital investment
- d. Concern that product quality may decline as a result of recycling
- e. Requirements to manifest wastes inhibit shipments off site for recycling
- f. Financial liability provisions inhibit shipments off site for recycling
- g. Technical limitations of production processes inhibit shipments off site for recycling
- h. Technical limitations of production processes inhibit on-site recycling
- i. Permitting burdens inhibit recycling
- j. Lack of permitted off-site recycling facilities
- k. Unable to identify a market for recyclable materials
- l. Recycling previously implemented - additional recycling does not appear to be technically feasible
- m. Recycling previously implemented - additional recycling does not appear to be economically feasible
- n. Recycling previously implemented - additional recycling does not appear to be feasible due to permitting requirements
- o. Other (SPECIFY COMMENTS IN BOX BELOW)

Comments: YES  Leachate from inactive Hazardous Waste Site. Leachate is generated to maintain the integrity of containment system. No further reduction is possible. Recycling is not feasible.

ATTACH SITE IDENTIFICATION LABEL OR ENTER BELOW. FOR ADDITIONAL SPACE USE COMMENTS BOX. DO NOT COPY FORM, CALL 518/457-3273 FOR COPIES.



U.S. ENVIRONMENTAL PROTECTION AGENCY

1991 Hazardous Waste Report

WASTE GENERATION AND MANAGEMENT

FORM

GM

SITE NAME P O L L U T I O N A B

A T E M E N T S E R V I C

EPA ID No. N Y D 0 0 0 5 1 1 6 5 9

INSTRUCTIONS: Read the detailed instructions beginning on page 13 of the 1991 Hazardous Waste Report booklet before completing this form.

Sec. I	A. Waste description Instruction Page 15 G W / L E A C H A T E T O C 1 0 0 0 m g / g										
	C O N T A M I N A N T S K N O W N C A R C I N O G E N S										
B. EPA hazardous waste code Page 16	D 0 1 8					C. State hazardous waste code. Page 15	D. SIC code Page 18				
	F 0 0 4						9 9 9 9				
E. Origin code Page 16	2	F. Source code Page 17	A 6 9	G. Point of measurement Page 17	1	H. Form code. Page 17	B 2 1 9	I. RCRA-radioactive mixed Page 17	2	J. Reported TRI constituent Page 18	1
K. CAS numbers. Page 18											
1. 2. 3. 4. 5.											

Sec. II	A. Quantity generated in 1990. Page 18	B. Quantity generated in 1991. Page 18	C. Page 18
	5 9 0 0 0	1 2 3 7 5 8	5
D. Did this site do any of the following to this waste: treat on site, dispose on site, recycle on site, or discharge to a sewer/POTW? Page 18			
1 YES (continue to system 1) <input checked="" type="checkbox"/> 2 NO (skip to SEC. III)			

ON-SITE SYSTEM 1	Quantity treated, disposed or recycled on site in 1991	ON-SITE SYSTEM 2	Quantity treated, disposed or recycled on site in 1991
M		M	

Sec. III	A. Was any of this waste shipped off site in 1991? Instruction Page 20	<input checked="" type="checkbox"/> YES (continue to box B)	<input type="checkbox"/> NO (skip to SEC. IV)
----------	---	---	---

Site 1	B. EPA ID No. of facility waste was shipped to Page 20	C. System type shipped to	D. Off-site availability code Page 21	E. Total quantity shipped in 1991 Page 21
	N Y D 0 4 3 8 1 5 7 0 3	M 0 8 2	1	1 2 3 7 5 8
Site 2	B. EPA ID No. of facility waste was shipped to Page 20	C. System type shipped to	D. Off-site availability code Page 21	E. Total quantity shipped in 1991 Page 21
		M		

Sec. IV	A. Did new activities in 1991 result in minimization of this waste? Instruction Page 22	<input checked="" type="checkbox"/> YES (continue to box B)	<input type="checkbox"/> NO (this form is complete)
---------	--	---	---

B. Activity. Page 22	W W	C. Other Effects. Page 22	W W	D. Quantity recycled in 1991 due to new activities Page 23	E. Activity/production index Page 23	F. 1991 Source reduction quantity Page 24
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Comments: YES

EACH SITE IDENTIFICATION LABEL OR ENTER BELOW. FOR ADDITIONAL SPACE USE COMMENTS BOX. DO NOT COPY FORM, CALL 518/457-3273 FOR COPIES.



U.S. ENVIRONMENTAL PROTECTION AGENCY

1991 Hazardous Waste Report

SITE NAME P O L L U T I O N A B

A T E M E N T S E R V I C

EPA ID No. N Y D 0 0 0 5 1 1 6 5 9

FORM

01

OFF-SITE IDENTIFICATION

**INSTRUCTIONS:** Read the detailed instructions on the back of this page before completing this form.

Site 1	A. EPA ID No. of off-site installation or transporter N Y D 9 8 0 7 6 1 1 9 1	B.	E N V I R O N M E N T A L P R O D U
	C. (CHECK ALL THAT APPLY) Generator <input checked="" type="checkbox"/> Transporter <input type="checkbox"/> TSDR <input type="checkbox"/>	D. Street P O B O X 3 1 5 City State Zip Code S Y R A C U S E N Y 1 3 2 0 9	

Site 2	A. EPA ID No. of off-site installation or transporter N Y D 0 4 3 8 1 5 7 0 3	B.	F R O N T I E R C H E M I C A L W
	C. (CHECK ALL THAT APPLY) Generator <input type="checkbox"/> Transporter <input type="checkbox"/> TSDR <input checked="" type="checkbox"/>	D. Street 4 6 2 6 R O Y A L A V E N U E City State Zip Code N I A G A R A F A L L N Y 1 4 3 0 3	

Site 3	A. EPA ID No. of off-site installation or transporter	B.	
	C. (CHECK ALL THAT APPLY) Generator <input type="checkbox"/> Transporter <input type="checkbox"/> TSDR <input type="checkbox"/>	D. Street City State Zip Code	

Site 4	A. EPA ID No. of off-site installation or transporter	B.	
	C. (CHECK ALL THAT APPLY) Generator <input type="checkbox"/> Transporter <input type="checkbox"/> TSDR <input type="checkbox"/>	D. Street City State Zip Code	

Site 5	A. EPA ID No. of off-site installation or transporter	B.	
	C. (CHECK ALL THAT APPLY) Generator <input type="checkbox"/> Transporter <input type="checkbox"/> TSDR <input type="checkbox"/>	D. Street City State Zip Code	

Comments: YES



## New York State Department of Environmental Conservation

### MEMORANDUM

**TO:** P. David Smith, Chief, CDS THRU Gerald J. Rider, Jr., Chief, O&M Section  
**FROM:** Ashok K. Gupta, Environmental Engineer II, O&M Section *A.K. Gupta*  
**SUBJECT:** Standby Contract WA # D002340-8 - URS Consultant Inc. *Gerald J. Rider, Jr.*  
 Operation and Maintenance of Pollution Abatement Services Site #7-38,007  
**DATE:** NOV 04 1991

The purpose of this memorandum is to bring your attention to the Environmental Products & Services (EP&S) (URS subcontractor for (i) Tank Cleaning Services and (ii) Leachate Hauling and Off-site Disposal) invoice No. 059645 dated 6/19/91 (copy attached), for the tank cleaning and wash water disposal activities. This voucher shows a significant intermediate mark-up by the EP&S over the actual disposal cost to Frontier Chemical (leachate disposal facility) .

This invoice was initially included in URS payment request #19 dated 8/21/91. The EP&S requested the disposal charges @ \$1.32 per gallon for the wash-water due to off-specification material (contained high solid contents). This disposal rate was verbally approved on May 16, 1991 conference call between NYSDEC and URS. The disposal charges (\$2,172.72 for 1,646 gallons of wash-water) were disallowed for want of backup documentation. The URS has now re-submitted the EP&S invoice for the payment of the disallowed amount with a backup invoice No. 24920 dated 5/16/91 (copy attached) from Frontier Chemicals for the disposal of wash-water.

The review of EP&S invoice and Frontier Chemical invoice reveals the following:

1. a. The disposal charges being paid by EP&S to Frontier Chemical are @ \$1.10 per gallon plus \$10.00 as weight toll (total disposal cost \$1,820.60 for 1646 gallons of wash-water).
- b. The base disposal rate charged by Frontier Chemical is @ \$0.17 per gallon and additional charges for off-specification material is @ \$0.93 per gallon (total @ \$1.10 per gallon).
2. The EP&S is charging the Department (through URS) @ \$1.32 per gallon (\$0.40 per gallon as base rate per their subcontract with URS and additional \$0.93 per gallon for off-specification material, claiming @ \$1.32 per gallon against \$1.33 per gallon). The total cost claimed by EP&S is \$2,172.72 for 1,646 gallons of wash water.

The review of above invoices indicates that EP&S base disposal rate contains a substantially high mark-up over the actual cost of disposal rate they are paying to Frontier Chemical. This is more significant in light of the fact that EP&S is also providing leachate removal and disposal services through another subcontract with URS Consultant where EP&S disposal is @ \$0.43 per gallon. On the basis of my continued discussions with URS in the past, I believe that the rate of disposal at the disposal facility, for the leachate is the same as that for the wash-water i.e. @ \$0.17 per gallon. To-date, about 104,000 gallons of leachate has been removed and disposed off-site. About 12,000 gallons of leachate is also removed every month.



# URS

AN INTERNATIONAL PROFESSIONAL SERVICES CORPORATION

## URS CONSULTANTS, INC.

282 DELAWARE AVENUE  
BUFFALO, NEW YORK 14202-1805  
(716) 856-5636  
FAX: (716) 856-2545

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SAN FRANCISCO  
WASHINGTON, DC

# FILE COPY

FAXED February 6, 1992

February 6, 1992

Anthony Napoli  
Environmental Products & Services, Inc.  
P.O. Box 315  
Syracuse, New York 13209-0315

FEB 10 1992

RE: PAS SITE O&M  
INVOICE FOR DECEMBER 1991 LEACHATE HAULING

Dear Mr. Napoli:

We had submitted your invoice for leachate hauling for the month of December to the New York State Department of Environmental Conservation (NYSDEC) for payment. Of the two loads hauled, a 5,983 gallon load of leachate (Manifest No. NTB4479444) was not accepted by Frontier Chemical as it was off-spec due to contamination of EP&S's tanker truck from a previous load. It is our understanding that the off-spec leachate was sent to Research Oil in Cleveland, Ohio for treatment.

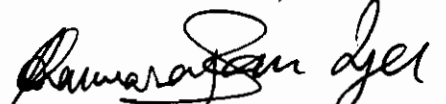
The NYSDEC informed us that the following additional information regarding the treatment of the off-spec leachate will be required before they can approve payment for the off-spec load:

1. Hazardous waste manifest for shipment of the 5,983 gallons of off-spec load to Research Oil.
2. Receipt of acceptance and method of treatment used to process leachate from Research Oil on their letterhead.

The NYSDEC has requested that the aforementioned documentation be submitted by February 10, 1992 for approval of the invoice. Otherwise a payment request for this load will have to be resubmitted along with the backup documentation with our next invoice to NYSDEC. If you have any questions regarding the required information, please do not hesitate to contact myself or John Lysiak.

Sincerely,

URS CONSULTANTS, INC.

  
Dharmarajan R. Iyer, Ph.D.  
Project Manager

DRI/ys  
2-6-92L.AN

cc: A.K. Gupta - NYSDEC  
John Gorton - URS  
File: 35236.00 (1012)



New York State Department of Environmental Conservation

MEMORANDUM

TO: A. K. Gupta - Room 416  
FROM: John May, Region 7  
SUBJECT: PAS MAINTENANCE  
DATE: October 1, 1992

9 1992

On September 30, 1992, I conducted a field inspection of the PAS site in response to the query from O'Brien & Gere dealing with the fence and abandoned 55 gallon drums.

It is true that the fence has been cut near the northeast corner of the property. I've been told by Dick Brazell of this office that this section of fence had been cut some time ago for access by a drilling contractor. It supposedly had been repaired. I've contacted our Operations staff in Cortland and will make arrangements for another repair hopefully next week.

Just outside of the fenced in area again near the northeast corner I found 14 steel 55-gallon drums. Ten were white and blue and four were rusted to the point that no paint remained. All seemed to be empty with bungs removed and/or holes in them. There is also other pieces of trash and scrap metal, appliances, piping, etc., both inside and outside of the fence in this corner. I will wait for further direction before taking any steps in this matter.

The last item of concern was gaps between the fence bottom and the ground. Yes, there are some areas with gaps 12" or greater. The most visible and readily assessable from East Seneca Street is where the creek enters the property in front of the plumbers building. Any effort to close this gap will have to take into consideration the stream flow and debris. Other gaps can be repaired by either resetting the posts or adding more fabric. Again, I have made no attempt to resolve these conditions and will wait for your comments.

You will find enclosed several photos taken on September 30, 1992, which I hope will help explain these points.

Enc.

*Address fallen trees and debris only for now! So the debris on-site? GRR 10/14/92 if so and its not waste we can remove.*

*AK- 10/19/92  
Has been done  
10/18/92*

**New York State Department of Environmental Conservation****MEMORANDUM**

**TO:** Distribution List Below  
**FROM:** Gerald J. Rider, Jr., Chief, Operation & Maintenance Section, BCS  
**SUBJECT:** PAS site O&M Site #7-38-001 (W.A. #D002340-8) Task 2 & 3 Evaluation of Leachate Collection System and Containment Cell Cap  
**DATE:** JUN 20 1991

A handwritten signature in cursive script, likely belonging to Gerald J. Rider, Jr., the Chief of the Operation &amp; Maintenance Section.

Attachment for your information and comments, is a copy the Final Report for Task 2 (Leachate Collection System Evaluation) and 3 (Cap Evaluation) received from URS Consultants, Inc. If you have any comments, regarding the suggested improvements at this site, please submit them to A. K. Gupta, of my staff, by July 1, 1991.

If you have any questions, please call me or A. K. Gupta at 518/457-0927.

Attachment

DISTRIBUTION LIST:

R. Lupe  
C. Branagh, Region 7





AN INTERNATIONAL PROFESSIONAL SERVICES ORGANIZATION

June 17, 1991

**URS CONSULTANTS, INC.**

282 DELAWARE AVENUE  
BUFFALO, NEW YORK 14202-1805  
(716) 856-5636  
FAX: (716) 856-2545

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Mr. A. K. Gupta, P.E., Project Manager  
Bureau of Western Remedial Action  
Division of Hazardous Waste Remediation  
New York State Department of  
Environmental Conservation  
50 Wolf Road  
Albany, New York 12233-7010

JUN 19 1991

RE: PAS SITE O & M - SITE NO. 7-38-001 (W.A. D002340-8)  
TASKS 2 AND 3 FINAL REPORT

Dear Mr. Gupta:

We are please to submit five (5) copies of the Final Report for Tasks 2 (Leachate Collection System Evaluation) and 3 (Cap Evaluation) of this work assignment. Your suggestions this morning on our earlier submittal have been incorporated in this final report.

If you have any questions, please contact me.

Very truly yours,


URS CONSULTANTS, INC.

Dharmarajan R. Iyer, Ph.D.  
Task Manager

DRI/ys  
Enc.

6-17-91R.AKG

cc: P. David Smith - NYSDEC  
J. Gorton - URS  
J. Lysiak - URS  
File: 35236.00 (3015)

  
New York State Department of Environmental Conservation  
50 Wolf Road, Albany, New York 12233 - 7010



Thomas C. Jorling  
Commissioner

MAY 16 1991

Dharmarajan R. Iyer, Ph.D  
Project Manager  
URS Consultants, Inc.  
282 Delaware Avenue  
Buffalo, NY 14202-1207

RE: Pollution Abatement Service (O&M) -Site #7-38-001 --  
Establishing Monuments and Horizontal Control

Dear Mr. Iyer:

This is to confirm our discussions of May 15, 1991 that the survey work at the above mentioned site be kept in abeyance until a decision on the construction of an on-site leachate treatment facility is made.

If you have any questions, please call me at 518/457-0927.

Sincerely,

A. K. Gupta, P.E.  
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cc: G. Rider  
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