permit.rcra.915244.
1988-01-22.Response_
to_Notice_of_inc_
application

GENERAL ELECTRIC

APPARATUS AND ENGINEERING SERVICES OPERATIONS
GENERAL ELECTRIC COMPANY • 175 MILENS ROAD • TONAWANDA, NEW YORK 14150 • (716) 876-1200

January 22, 1988

New York State
Department of Environmental Conservation
Division of Regulatory Affairs - Region 9
600 Delaware Avenue
Buffalo, NY 14202-1073

Attention: Mr. Paul D. Eismann
Deputy Permit Administrator

Dear Sir:

The following summary, additional drawings and revised pages are being submitted as responses to Notice of Incomplete Application dated December 17, 1987.

Reference General Electric Co., Part 373 Hazardous Waste Operating permit. Application number 90-84-1218.

Sincerely,

Anthony Hejmanowski

A. Hejmanowski
PCB Specialist

AH/te

cc: Mr. E. Bellmore; Attn.: Mr. R. Fischer
Mr. P. Counterman; Attn.: Ms. Rosita DiCioccio
Mr. A. Bellina, US EPA Region II

RESPONSE SUMMARY

The following summary should be used as a guide that indicates where the the responses to the NIA can be found in the revisions attached.

A. GENERAL

1. Summary of Responses follows.

2. Additional comments regarding waste analysis section have been received and replies are located in Section C of this summary.

3. See additional copies of design drawings certified by registered professional engineer. Floodplain map furnished was obtained from Federal Emergency Management Agency. Also, note that included with design drawings is a construction drawing of expanded PCB work area.

4. Replies to Section G Corrective Action Comments are included with this submittal.

B. PROCESS INFORMATION

1. Storage of 52,300 gallons PCB material in PCB work area.

2. Use of steel drum dollies.

Replies to Items 1 and 2 above can be found on page 1, of B. Process Information - Container Storage Section.
Please insert this page in Container Storage Section of Permit Application.

3. Use of 2000 gallon scrap oil tank.

4. Details of high level alarms and automatic cut-off for storage tanks.

Replies to Items 3 and 4 can be found on pages 2 and 3 of B. Process Information - Tank Storage Section. Insert these pages and drawings as additions to Tank Storage Section of Application.

C. WASTE ANALYSIS

1. Management of hazardous waste generated by discarded stock.

See page 1 of C. Waste Analysis Plan Revision contained in these responses.

2. See change to "NYSDEC technically acceptable lab" on page 2 of Revised Waste Analysis Plan.

3. Composition of wastes are listed on page 2 and 3 of Revised Waste Analysis Plan.

RESPONSE SUMMARY

C. WASTE ANALYSIS (Continued)

4. Updated references of SW-846 test methods will be utilized. See page 3 of Revised Waste Analysis Plan.

5 & 6. Waste sampling and analysis frequency.

See pages 4 and 5 of C. Waste Analysis Plan for responses to above items.

7. Verification of generator data for off-site PCB wastes.

Refer page 6 of C. Waste Analysis Plan Section of Responses.

8. Off-site PCB waste notification of significant change in waste stream.

See page 7 of Waste Analysis Revision Section.

9. See attached 2c/QA plan of one of the test labs utilized by General Electric located in the Waste Analysis Section of these responses.

10. Chemical and physical analysis of waste streams.

Refer Item 10, page 8 of Waste Analysis Plan Responses.

11-13. Responses can be found on page 9 of Waste Analysis Plan Responses.

D. PROCEDURES TO PREVENT HAZARDS

1. Inspection remedial actions.

2. Inspection of diked areas by registered professional engineer.

Replies to Itesm 1 and 2 are located on page 1 of Section D. Procedures to Prevent Hazards - Inspections. This page should be inserted as page 3A of Revised Inspection Schedule of Inspection Section of Permit.

3. Absorbent mats will be included in the Contingency Plan Emergency Equipment List. The absorbent mats will be located at the same location with the spill control equipment kits. Drawing showing location of the spill equipment kits was submitted Oct. 8, 1987.

A revised emergency equipment list is attached with this revision. See Contingency Plan and Emergency Procedures Section of Permit. Remove page 8 of Contingency Plan Revision and insert Revised Emergency Equipment List, located in Attachment Section of this response.

4. If implementation of the Contingency Plan is required documentation of Contingency Plan implementation will be noted in operating record.

D. PROCEDURES TO PREVENT HAZARDS (Continued)

4. See revised page 6 of, "G. Contingency Plan Revisions" and insert this revised page in Contingency Plan and Emergency Procedures Section of Permit. Revised page 6 is located in Attachment Section of this NIA.

5. See details of loading/unloading procedures. Pages 2, 3, and 4 of, D. Procedures To Prevent Hazards Section of Revisions attached. Insert these revised pages in Contingency Plan Section of Permit.

E. CONTINGENCY PLAN

1. Spills during transportation.

   Reply to this item is located on page 1 and 2 of E. Contingency Plan Revisions. Insert these additions to Contingency Plan Section of Permit.

F. CLOSURE PLAN

1. See Revised Closure Plan for statement of partial closure of one tank per addendum A.

2. Decontamination of PCB work area is included in Revised Closure Plan.

3. See Revised Closure Plan for disposal of 20,000 gallons liquid.

4. Cost estimate for closure of 2000 gallon tank is included.

5 a-g. See Revised Closure Plan for certification of closure information requirements.

6. See Revised Closure Plan for list of vendors to be used for closure.

7. Professional engineer certification for underground tank closure will be provided. See document of June 6, 1986 page 3 of Tank System Removal Plan included with addendum A to Closure Plan Revision of Oct. 1986.

G. CORRECTIVE ACTION

Replies to Items 1 thru 9 can be found in Corrective Action Section of these responses.

H. ADDITIONAL REVISIONS

1. See attached pages 1 and 1A titled, C. Waste Characteristics. These revised pages add state listed PCB wastes General Electric receives from

H. ADDITIONAL REVISIONS (Continued)

1. off-site. Insert these pages in Chemical and Physical Analysis Section of Permit. Revised pages 1 and 1A should replace page 1 of Waste Characteristic Revision of Oct. 1987.

PROCESS INFORMATION

JAN 2 2 1988

INDEX

RESPONSE SUMMARY

JUL 2 2 1988

CONTINGENCY PLAN

JAN 2 2 1988

Rosita,
many typos
are in this
section
DCN

CORRECTIVE ACTION
COMMENTS . . .

G. CORRECTIVE ACTION

1. A determination regarding the removal of the concrete ballast pad will be made during the excavation of soil. NYSDEL will be advised when soil excavation is scheduled.

2. The sump outside of the curbed PCB container storage area is a grate covered 3' x 3' x 1' deep sump. This sump has never been connected to any discharge piping.

3. See attached drawings marked South, and East Oil/Water Separator. Industrial wastewater enters unit, passes through a baffled tank to remove floating oils and settled grit. Wastewater then enters sanitary sewer system.
Presently, the oil/water separators are checked periodically and generally cleaned out on a yearly basis.
A revised inspection and clean out schedule is in the process of being implemented. Basically, the units will be inspected quarterly with clean out performed as indicated by inspections.
Wastewater from separators flows through sanitary sewer system. As requested by the Town of Tonawanda, quarterly analysis of discharges into town sanitary sewer are made.

4. The pipes sticking out of the ground near the 10CA oil storage tanks are storm sewer line clean outs. These pipes will be identified as such.

5. The samples of abrasive blast material were not tested for PCBs. When it is known that abrasive blast material was used to clean transformer components PCB analysis of blast material will be conducted.

6. At present, the source of contamination of groundwater next to the new oil-water separator is unknown. Details concerning further investigation of this site will be prepared during the RFI phase of the Corrective Action Program.

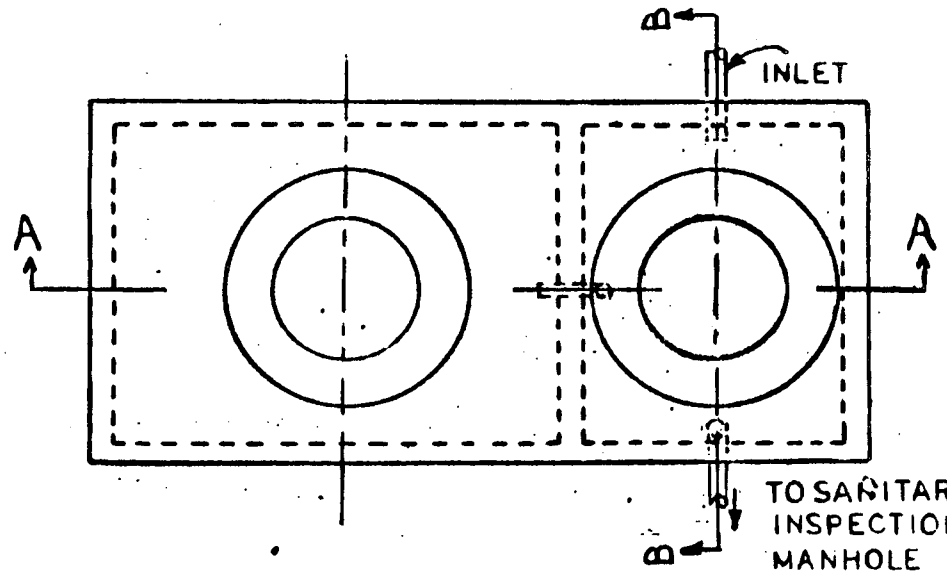
7. Town of Tonawanda has established a waste-water discharge limit of 100 mg/L for oil and grease effluent. The measured 89 PPM petroleum hydrocarbon effluent is below town limitations.

8. The accumulator (Reference Sample W7) is the coalescer filter for shop air compressor. The blowdown of the accumulator is connected to a 55 gallon storage container.

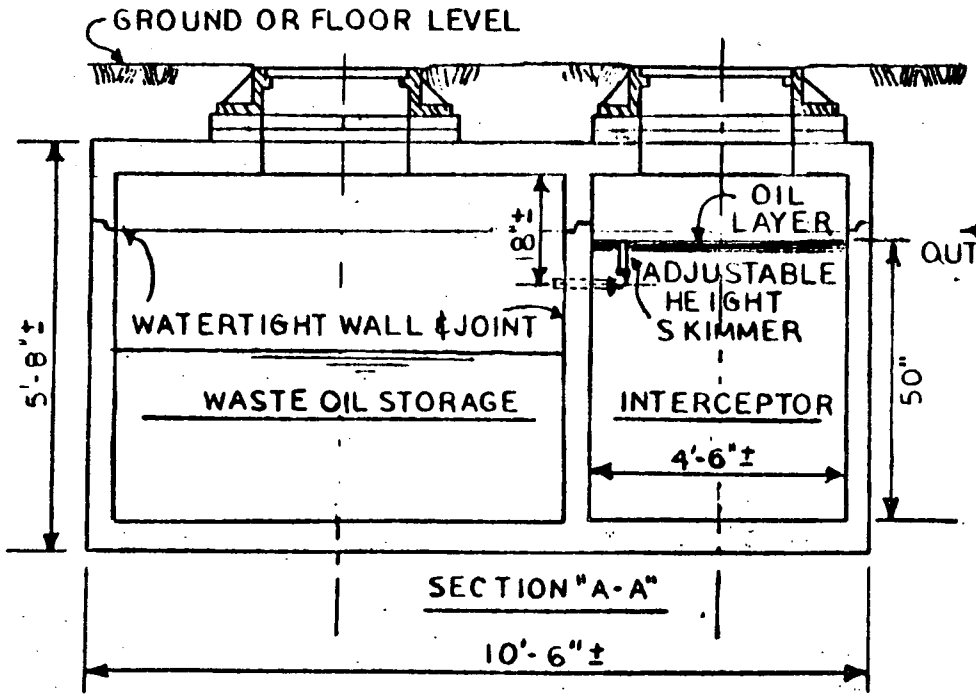
9. Attached find MSDS from Texaco for 01515 inhibited transformer oil. General Electric Co. utilizes this liquid for insulating fluid and identifies the liquid as 10CA oil.

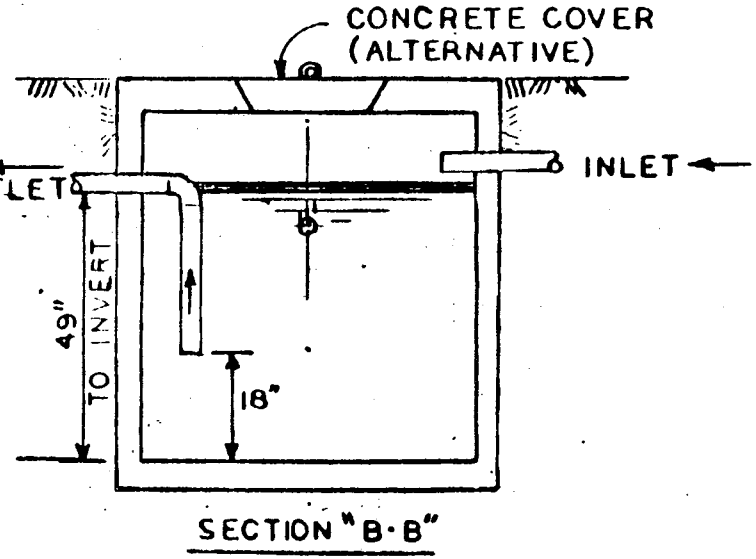
SOUTH(NEW) OIL/WATER SEPARATOR

JAN 22 1990



CONCRETE OIL INTERCEPTOR AND STORAGE TANK
—VENT AS REQ'D
—DEPTH TO SUIT



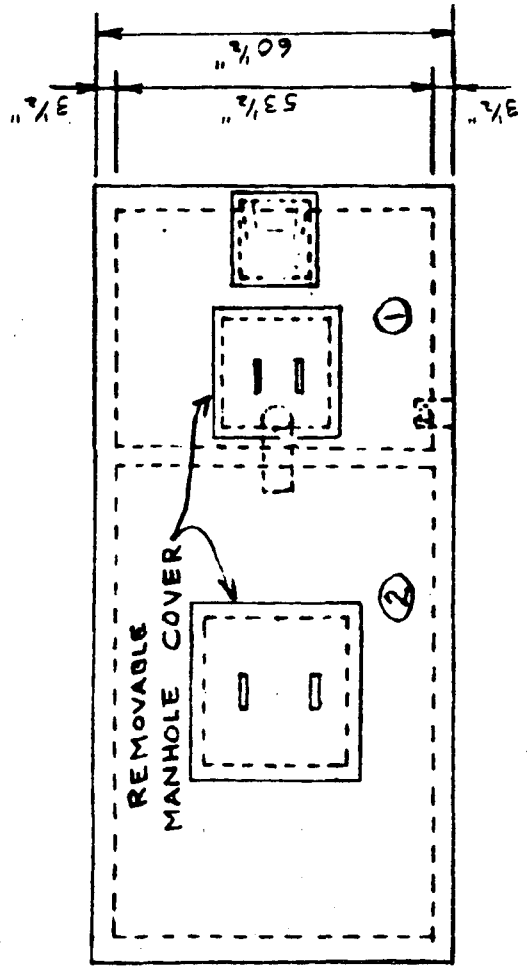


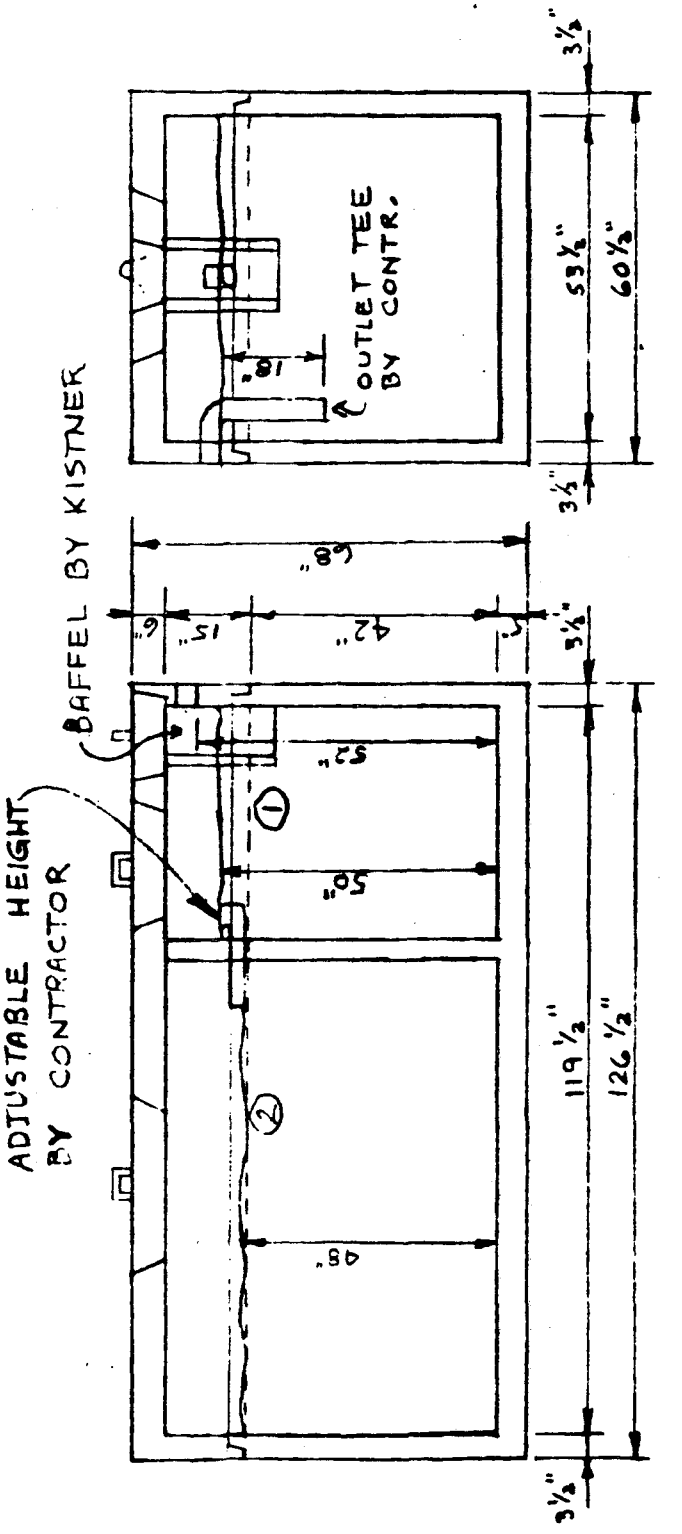
KISTNER CONCRETE PRODUCTS
1800 DALE ROAD, CHEEKTOWAGA, NEW YORK 14225

EAST (OLD) OIL/WATER SEPARATOR

NOTES:
CONCRETE: 6 BAG MIX
3000 PSI. @ 28 DAYS
STEEL: 6"x6" 10/10 GA.
WIRE MESH THROUGHOUT
#3 REBAR 12" O.C. HORIZ.

① COLLECTION TANK 400 GALLONS
② OIL STORAGE TANK 850 GALLONS





1250 GALLON (GREASE TRAP)
COMBINATION OIL STORAGE AND COLLECTION TANK

DRAWN BY	KISTNER CONC.
DATE	11-28-73
SCALE	3/8" = 1'-0"
	109

JAN 2 2 1988

TEXACO INC.

INDUSTRIAL HYGIENE, TOXICOLOGY, AND MATERIAL SAFETY DATA SHEET

NOTE: NO REPRESENTATION IS MADE AS TO THE ACCURACY OF THE INFORMATION HEREIN. SEE PAGE 5 FOR CONDITIONS UNDER WHICH DATA ARE FURNISHED.

Trade Name and Synonyms

01515 TRANSFORMER OIL INHIBITED

Manufacturer's Name

Texaco Inc

Emergency Telephone No.

(914) 831-3400 ext. 406

Address

P.O. Box 509 Beacon, NY 12508

Chemical Name and/or Family or Description

Transformer Oil

THIS PRODUCT IS CLASSIFIED AS: X NOT HAZARDOUS:

_____ HAZARDOUS BY DEFINITION NO.(S) _____ ON ATTACHED EXPLANATION SHEET 4

WARNING STATEMENT:

NONE CONSIDERED NECESSARY.

OCCUPATIONAL CONTROL PROCEDURES

Protective Equipment (Type)

Eyes: Chemical type goggles or face shield optional.

Skin: Exposed employes should exercise reasonable personal cleanliness; this includes cleansing exposed skin areas several times daily with soap and water, and laundering or dry cleaning soiled work clothing at least weekly.

Inhalation: None required if exposures are within permissible concentrations; see below.

Ventilation Required: Normal

Permissible Concentrations:

Air: 5 mg/cubic meter of air for mineral oil mist averaged over an 8 hour daily exposure (ACGIH, 1982).

EMERGENCY AND FIRST AID PROCEDURES

First Aid

Eyes: As with most foreign materials, should eye contact occur, flush eyes with plenty of water.

Skin: None considered necessary.

Ingestion: None considered necessary.

Inhalation: None considered necessary.

Other Instructions: None.

N.D. - Not Determined N.A. - Not Applicable

< Less Than > Greater Than

JAN 2 2 1988

TEXACO

PHYSIOLOGICAL EFFECTS:

Code No. 01515

Effects of Exposure

Acute:

Eyes: N.D.Believed to be minimally irritating.

Skin: N.D. Believed to be minimally irritating.

Respiratory System: N.D. Believed to be minimally irritating if not in excess of permissible concentrations; see page 1.

Chronic: N.D.

Other: -

Sensitization Properties:

Skin: Yes ___ No ___ Unknown X Respiratory: Yes ___ No ___ Unknown X

Median Lethal Dose ($LD_{50}LC_{50}$)(Species)

Oral N.D.; believed to be G.T. 5 g/kg (rat); practically non-toxic

Inhalation N.D.

Dermal N.D.; believed to be G.T. 10 g/kg (rabbit); practically non-toxic

Other N. D.

Irritation Index, Estimation of Irritation (Species)

Skin N.D.; believed to be L.T. 0.5/8.0 (rabbit); no appreciable effect

Eyes N.D.; believed to be L.T. 15/110 (rabbit); no appreciable effect

Symptoms of Exposure N.D.; None expected other than possible minimal irritation

FIRE PROTECTION INFORMATION

Ignition Temp. F. N.D. Flash Point F. (Method) 295 °F (COC)

Flammable Limits% Lower N.D. Upper N.D.

Products Evolved When Subjected to Heat or Combustion:

Carbon monoxide, carbon dioxide, aldehydes and ketones, combustion products of nitrogen and sulfur.

Recommended Fire Extinguishing Agents And Special Procedures:

According to the National Fire Protection Association Guide, use water spray, dry chemical, "alcohol" foam, or carbon dioxide. Water or foam may cause frothing. Use water to cool fire-exposed containers. If a leak or spill has not ignited, use water spray to disperse the vapors and to provide protection for persons attempting to stop the leak.

Unusual or Explosive Hazards:

None.

N.D. - Not Determined N.A. - Not Applicable
< Less Than > Greater Than

TEXACO

ENVIRONMENTAL PROTECTION

Code No. 01515

Waste Disposal Method:

Under RCRA, it is the responsibility of the user of products to determine, at the time of disposal, whether product meets RCRA criteria for hazardous waste. This is because product uses, transformations, mixture, processes, etc. may render the resulting material hazardous.(See Remarks for Waste Classification)

Procedures in Case of Breakage or Leakage:

Contain spill if possible. Wipe up or absorb on suitable material and shovel up.

Remarks:

Waste Classification: Product has been evaluated for RCRA characteristics and does not meet criteria of a hazardous waste if discarded in its purchased form.

PRECAUTIONARY LABEL

NONE CONSIDERED NECESSARY.

Requirements for Transportation, Handling and Storage:

Minimum feasible handling temperatures should be maintained. Periods of exposure to high temperatures should be minimized. Water contamination should be avoided.

DOT Proper Shipping Name: N.A.
DOT Hazard Class (if applicable): N.A.

CHEMICAL AND PHYSICAL PROPERTIES

Boiling Point (°F) N.D. Vapor Pressure N.D. (mmHg)

Specific Gravity .889 (H_2O=1) Vapor Density N.D. (Air=1)

Appearance and Odor clear and bright

pH of undiluted product N.A. Solubility N.D.

Percent Volatile by Volume N.D. Evaporation N.D. ( )=1

Viscosity 9.6 cSt @ 40 °C Other -

Hazardous Polymerizations _____ Occur X Do not occur

The Material Reacts Violently With: (If Others is checked below, see Additional Comments on Page 4 for further details)

Air	Water	Heat	Strong Oxidizers	Others	None of These
					X

N.D. - Not Determined N.A. - Not Applicable
< Less Than > Greater Than

JAN 2 2 1988

TEXACO

COMPOSITION

Code No. 01515

Components Presenting a Significant Hazard	%
None	

Other Components	%
Mineral oil	Greater than 95
Ditertiarybutylphenol	Less than 1

ADDITIONAL COMMENTS

TEXACO INTENDS TO COMPLY FULLY WITH PROVISIONS OF THE TOXIC SUBSTANCES CONTROL ACT
STATE OF MICHIGAN CRITICAL MATERIALS ACT (REVISED 1982)

No critical materials present.

To determine applicability or effect of any law or regulation with respect to this product, user should consult his legal advisor or the appropriate government agency. Texaco does not undertake to furnish advice on such matters.

By R. T. Richards Title Mgr. Env. Conservation & Toxicology

Date: 01-07-83 ☒ New ☐ Revised, Supersedes

N.D. - Not Determined N.A. - Not Applicable
< Less Than > Greater Than

NOTE: THIS DATA IS FURNISHED GRATUITOUSLY INDEPENDENT OF ANY SALE OF THE PRODUCT. ONLY FOR YOUR INVESTIGATION AND INDEPENDENT VERIFICATION. WHILE THE INFORMATION IS BELIEVED TO BE CORRECT, TEXACO INC. MAKES NO REPRESENTATION AS TO THE ACCURACY OF THE INFORMATION CONTAINED HEREIN. TEXACO INC. SHALL IN NO EVENT BE RESPONSIBLE FOR ANY DAMAGES OF WHATSOEVER NATURE DIRECTLY OR INDIRECTLY RESULTING FROM THE PUBLICATION OR USE OF OR RELIANCE UPON DATA CONTAINED HEREIN. NO WARRANTY, EITHER EXPRESS OR IMPLIED OF MERCHANTABILITY OR FITNESS OR OF ANY NATURE WITH RESPECT TO THE PRODUCT OR TO THE DATA HEREIN IS MADE HEREUNDER. DATA SHEETS ARE AVAILABLE FOR ALL TEXACO PRODUCTS. YOU ARE URGED TO OBTAIN DATA SHEETS FOR ALL TEXACO PRODUCTS YOU BUY, PROCESS, USE, OR DISTRIBUTE, AND ENCOURAGED TO ADVISE ANYONE WORKING WITH OR EXPOSED TO SUCH PRODUCTS OF THE INFORMATION CONTAINED HEREIN.

EXPLANATION OF THE INDUSTRIAL HYGIENE TOXICOLOGY, AND MATERIAL SAFETY DATA SHEET

PRODUCT INFORMATION

Trade Name and Synonyms

Refer to the code number and name under which the product is marketed and the common commercial name of the product.

Manufacturer's Name and Address Self explanatory.

Chemical Name and/or Family or Description

Refers to chemical, generic, or descriptive name of single elements and compounds.

For purposes of this form, a product is defined as hazardous if it possesses one or more of the following characteristics: (1) has a flash-point below 200 degrees Farenheit, closed cup or subject to spontaneous heating; (2) has a threshold limit value below 500 ppm for gases and vapor, below 5 mg/m^3 for dusts, fumes and mist, and below 25 MPPCF for mineral dust; (3) a single dose oral LD50 below 500 mg/kg; (4) causes burns to the skin in the short-term exposure or is systemically toxic by skin contact; (5) has been demonstrated to be a skin or eye irritant or causes respiratory irritation; (6) may cause skin or respiratory sensitization; (7) has teratogenic, mutagenic or other toxic effects; (8) may cause asphyxia or pneumonoconiosis; (9) in the course of normal operations may produce dusts, gases, fumes, vapors, mist, or smoke which have one or more of the above characteristics.

OCCUPATIONAL CONTROL PROCEDURES

Protective Equipment

Type of protective equipment that is necessary for the safe handling and use of this product.

Ventilation

Ventilation: type, i.e. local exhaust, mechanical, etc.

Permissible Concentrations

Indicates Threshold Limit Value (TLV) and / or Time Weighted Average (TWA) as established by the American Conference of Governmental Industrial Hygienists and/or standards promugated by the Occupational Safety and Health Administration.

EMERGENCY AND FIRST AID PROCEDURES

Gives first aid and emergency procedures in case of eye and/or skin contact, ingestion and inhalation.

PHYSIOLOGICAL EFFECTS

Acute Exposures (Eye, Skin, Respiratory System)

Refers to the most common effects that would be expected to occur from direct contact with the product.

Chronic

Refers to the effects that are most likely to occur from repeated or prolonged exposure.

Sensitizer

Means a substance which will cause on or in normal living tissue, through an allergic or photodynamic process, a hypersensitivity which becomes evident on reapplication of, or exposure to, the same substance.

Median Lethal Dose or Concentration (LD50,LC50)

Refers to that dose or concentration of the material which will produce death in 50 per cent of the animals. For inhalation, exposure time is indicated.

Irritation Index

Refers to an empirical score (Draize Method) for eye and skin irritation which tested by the method described. If numbers are not available, a yes or no answer indicates whether or not the material is an irritant.

FIRE PROTECTION INFORMATION

Ignition Temperature

Refers to the temperature in degrees Farenheit, at which a liquid will give off enough flammable vapor to ignite and burn continuously for 5 seconds.

Flash Point (State Method Used)

Refers to the temperature in degrees Farenheit, at which a liquid will give off enough flammable vapor to ignite.

Flammable Limits

Refers to the range of gas or vapor concentration (percent by volume in air) which will burn or explode if an ignition source is present. Lower means the lower flammable limit and upper means the upper flammable limit given in percent.

Products Evolved When Subjected to Heat or Combustion.

The products evolved when this material is subjected to heat or combustion. Includes temperature at which oxidation or other forms of degradation occurs.

Recommended Fire Extinguishing Agents and Special Procedures

Specifies the fire fighting agents that should be used to extinguish fires. If unusual fire hazards are involved or special procedures indicated, this is specified.

Unusual Fire or Explosive Hazards

Specific hazards to personnel in case of fire, explosive danger.

ENVIRONMENTAL PROTECTION

Specifies how this product can be successfully disposed of.

Indicates precautions necessary in the event that leakage or breakage occurs. Included are (a) clean-up procedures, (b) personal protective equipment if necessary, (c) hazards that may be created, i.e. fire, explosion, etc.

PRECAUTIONARY LABEL

Label that is required or recommended.

Requirements for Transportation, Handling and Storage

Specifies handling and storage procedures. Gives ICC, DOT, or other regulations related to safety and health for transportation.

CHEMICAL AND PHYSICAL PROPERTIES

Boiling Point (or Range)

In degrees Farenheit or Celsius Boiling Point at 760 mmHg.

Vapor Pressure

Refers to pressure of saturated vapor above the liquid expressed in mm of Hg. at 20 degrees Celsius or 68 degrees Farenheit

Specific Gravity

The ratio of the density of the product to the density of water.

Vapor Density

The ratio of the density of the vapor at saturation concentrations (20 degrees Celsius or 68 degrees Farenheit to the density of air at 760 mmHg.)

Appearance and Odor

Refers to the general characterization of the material, e.g. powder, colorless liquid, aromatic odor, etc.

pH

Refers to the degree of acidity or basicity of the material in a specific concentration.

pH1-5 - strongly acidic
pH5-7 - weakly acidic
pH7-9 - weakly basic
pH9-14 - strongly basic

Solubility

Refers to the solubility of a material by weight in water at room temperature. The terms negligible, less than 0.1 %; slight, 0.1 to 1%; moderate, 1 to 10%; appreciable, 10% or greater. Gives solubility in organic solvents where appropriate.

Percent volatile by volume

Refers to the amount volatized at 20 degrees Celsius or 68 degrees Farenheit when allowed to evaporate.

Evaporation

Gives the rate of evaporation compared to a standard

Viscosity

Measure of flow characteristics in Kinematic viscosity of Saybolt Universal Seconds.

Hazardous Polymerization

Hazardous polymerization is that reaction which takes place at a rate which produces large amounts of energy. Indicates whether it may or may not occur and under what storage conditions.

Does the Material React Violently

Indicates whether the material will react violently, releasing large amounts of energy when exposed under conditions listed.

Composition

Components of the product as manufactured.

Texaco Inc.
2000 Westchester Avenue
White Plains, New York 10650
Phone (914) 253-4000 (White Plains)
(914) 831-3400 (Beacon)

ADDITIONAL REVISIONS

MAY 2 2 1988

ATTACHMENTS

JAN 2 2 1988

-- ATTACHMENTS --

J. DRAWINGS

Additional design drawings and engineering drawings requiring registered professional engineer seal are being sent under separate cover.