

**United States Environmental Protection Agency
Region II
POLLUTION REPORT**

Date: Thursday, November 9, 2006

From: Cris D'Onofrio

To: Cris D'Onofrio, USEPA
Eric Mosher, USEPA, Region 2, ERRD-RPB
George Zachos, USEPA Region 2 ERRD
Joe Rotola, USEPA Region 02
Eric Wilson, ERRD-RAB

James Daloia, USEPA, Region 2, ERRD-RPB
Argie Cirillo, ORC
Doug Kodama, USEPA Region 2 ERRD
Michael Hoppe, USEPA
Mark Pane, USEPA, Region 02, ERRD-RAB

Subject: Initiation of Action
R.N.Hitchcock Electroplating Facility
58 Green Street, Port Byron, NY
Latitude: 43.0383000
Longitude: -76.6286000

POLREP No.:	1	Site #:	XG
Reporting Period:	10/16/06 through 11/9/06	D.O. #:	0037
Start Date:	10/16/2006	Response Authority:	CERCLA
Mob Date:	10/16/2006	Response Type:	Time-Critical
Demob Date:		NPL Status:	Non NPL
Completion Date:		Incident Category:	Removal Action
CERCLIS ID #:	NYN000205895	Contract #	EP-W-04-055
RCRIS ID #:			

Site Description

The RN Hitchcock Electroplating Facility Site was a former electroplating and metal-finishing facility which was operated by various owners from 1946 until 2003. The New York State Department of Environmental Conservation ("NYSDEC") conducted a Site inspection on April 30, 2003 and discovered the facility had been abandoned. At the time of the visit, NYSDEC identified unknown chemicals remaining in drums, open vats, tanks and small containers and an underground settling tank located on the east side of the site. On November 2, 2005, after subsequent investigations, NYSDEC requested that the U.S. Environmental Protection Agency ("EPA") conduct a time-critical removal action under the Comprehensive Environmental Response, Compensation, and Liability Act, as amended ("CERCLA"), 42 U.S.C. § 9601 et seq.

EPA visited the Site on December 12, 2005 to conduct an RSE. Additional assessment activities were conducted in May of 2006 as a follow-up to the RSE. EPA assessment activities as of May 2006 included a gross inventory of hazardous substances and pollutants that are currently stored at the Site, a visual evaluation of Site conditions and sampling of the underground settling tank and some of the vats and containers. The results of the Site assessment/RSE confirmed that there are approximately seventeen open-top vats which contain corrosive plating solutions, approximately forty nine 55-gallon drums, approximately sixty 5-gallon pails and an assortment of 40 and 50 pound bags of dry chemical. Many of the drums and other containers hold acids, basic solutions, cyanide solutions, chromate solutions, flammable liquids, oxidizers and other hazardous materials. Drums and chemical bags include labels such as oxidizer, toxic, corrosive, copper cyanide, nickel chloride, cadmium oxide, sulfuric acid, and sodium metabisulfite (anhydrous). Many of the chemicals were improperly stored and in containers that were leaking or of poor integrity.

Analytical results of sampling conducted as part of the RSE confirmed the presence of flammable liquids and acids in the drums that were sampled. Samples collected from vats confirmed the presence of cyanides and heavy metals in the acid and base solutions present in these containers. Heavy metals detected include cadmium, chromium, copper, lead, nickel and zinc.

Additional areas of concern that were identified during EPA assessment activities include badly stained floors with heavy chemical residues on the inside of the plating shop; potential chemical staining on the outside of the eastern foundation walls of the building; a large floor sump located in the plating shop area that is potentially contaminated by chemical spillage; and an underground settling tank that is located immediately adjacent to the Owasco Lake Outlet along the eastern site border.

Current Activities

Mobilization activities were initiated on October 16, 2006 and include the following:

- Set up of command post/crew trailers and site support facilities.
- Construction of a permanent decontamination reduction zone and installation of hot zone barriers.
- General debris clean-up and staging.
- Clean-out of adjacent building structures to be used as future storage areas and to gain access to chemicals that were haphazardly stored there.
- Collection of chemical product containers from various portions of the building and restaging in the electroplating shops and adjacent boiler room for future sampling.
- Investigation and sampling of the underground settling tank for disposal analysis.

A chemical inventory, sampling and hazcat operations were completed as of 11/8/06. One hundred sixty four containers, including drums, vats and small containers were sampled and tested for hazard characterization screening. Work continues on waste stream compatibility testing.

Temporary wood-frame bracing was installed inside the plating shop to support roof rafters/joists that are being used to anchor a drum hoist for over packing purposes. Previous construction activities by past building occupants left this area vulnerable to collapse when a weight-bearing wall was removed and improperly supported. The area is now structurally sound and has been prepared for over packing operations. Drum over packing operations began late yesterday (11/8/06) and will continue as feasible pending results of compatibility testing.

The temporary off-site drum staging area has been established and Con-Ex boxes have been delivered to the off-site location being provided by the Town. The first shipment of drums was delivered to this location for temporary storage today. Emergency contact information and Con-Ex inventories are being provided to township officials and emergency services personnel as a precautionary measure.

Analytical results for the underground settling tank water and sludge materials have been received. Pump out of the tank will commence as soon as transportation and disposal can be scheduled.

Planned Removal Actions

Currently planned removal actions include the following:

- Consolidate waste streams as feasible and over pack/lab pack all chemical containers as necessary;
- Transportation and disposal of all chemical wastes on-site;
- Removal and disposal of all tanks and vats;
- Removal and disposal of contaminated wood plank flooring;
- Removal of the thick chemical residues from and final pressure washing of the concrete slab floors and walls in the plating shop;
- Pump out of the underground settling tank;
- Decontamination of the underground settling tank;
- Collection of post clean-up samples from the effected walls and floors of the plating shop;
- Collection of post clean-up samples from the underground settling tank concrete walls and floor;
- Collection of investigatory samples from the stained areas of the building foundation walls, the soils beneath the underground settling tank, and the soils at the underground settling tank discharge point; and
- Site restoration activities as required.

Next Steps

Waste stream compatibility testing will continue throughout the next week. Wastes will be consolidated, drummed and/or over packed as feasible throughout the week. Clean-out of the underground settling tank will be scheduled during the week of November 28, 2006, weather permitting.

Key Issues

The OSC attended a town meeting at the Town of Mentz on October 17, 2006 to inform town officials of planned site activities. A subsequent meeting was conducted between the OSC, the Town of Mentz Supervisor and town council members on 10/26/06 to provide detailed plans of the removal action and to discuss EPA plans for temporary storage of drummed wastes. The Town of Mentz is providing assistance to EPA in the form of a temporary storage area since there is limited area on-site that would be adequate for drum storage. All drums will be over-packed and stored in Con-Ex boxes at the temporary storage site until transportation and disposal of the materials can be executed. The appropriate NYSDEC and EPA RCRA Division personnel have been notified of the temporary storage plans.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$400,000.00	\$114,957.00	\$285,043.00	71.26%
Intramural Costs				
Total Site Costs	\$400,000.00	\$114,957.00	\$285,043.00	71.26%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

response.epa.gov/HitchcockPlating

POLREP #1 Last Updated 12/1/2006