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ERIE COUNTY LEGISLATURE

92 Franklin Street - 4th Floor
Buffalo, New York 14202

TO: Members of the Erie County Legislature

FROM: Karen M. McCarthy, Clerk

DATE: May 11, 2015

SUBJECT: New York State Department of Environmental Conservation Documents Received

The following documents were submitted by the New York State Department of Environmental Conservation (NYSDEC):

Public Comment is invited on a proposed cleanup plan for the Tecumseh Redevelopment Inc. (Former Bethlehem Steel Site).

Action to address the contamination to the Gastown MGP Tonawanda site location at 126 East Niagara Street, Tonawanda NY is to begin.

Thank you.



FACT SHEET RCRA Corrective Action Program
Receive Site Fact Sheets by *Email*. See "For More Information" to Learn How.

Site Name: Tecumseh Redevelopment Inc. (Former Bethlehem Steel Site) **May 2015**
Site No. 915009 – OU02 and OU03
Website: <http://www.dec.ny.gov/chemical/55843.html>

**Proposed Cleanup Plan Available For Public Comment
Public Meeting Announced**

The public is invited to comment on a remedy proposed by New York State Department of Environmental Conservation (DEC) related to the former Bethlehem Steel site ("site") located on the shores of Lake Erie in Lackawanna. Please see the map for the site location.

PUBLIC MEETING
Wednesday, May 20 at 6:30 p.m.
Lackawanna Senior Center
230 Martin Road, Lackawanna

DEC invites you to a public meeting to discuss the remedy proposed for the site. You are encouraged to provide comments at the meeting, and during the 30-day comment period described in this fact sheet.

Documents related to the cleanup of this site can be found at the location identified below under "Where to Find Information."

How to Comment

DEC is accepting written comments about a proposed cleanup plan, called the draft Statement of Basis for 30 days, from **May 6, 2015** through **June 4, 2015**. The proposed plan is available for review at the location identified below under "Where to Find Information." Please submit comments to DEC project manager listed under Project Related Questions in the "Who to Contact" area below.

Summary of the Proposed Action

Waste material from three Solid Waste Management Units (SWMUs), referred to as Operable Unit 02 (OU02), will be stabilized and consolidated on-site into the Acid Tar Pit (ATP) area. The ATP area is referred to as Operable Unit 03 (OU03) and was subject to a prior DEC clean-up decision. In conjunction with the clean-up currently proposed for OU02, the engineering controls for groundwater at OU03 (pumping and treatment) will also be enhanced and the design for the final cap of the ATP area is being modified.

OU02 Material

Approximately 8,600 cubic yards of soil and fill containing contaminants at levels exceeding industrial use cleanup objectives (as per 6NYCRR Part 375-6.8) will be stabilized, removed, and

consolidated in another part of the site (into ATP Operable Unit 3). Removal areas will be backfilled with DEC-approved materials.

The contaminants of concern identified for the OU02 SWMUs are related to coking and steel-making operations and include, lead, arsenic, benzene, ammonia and polycyclic aromatic hydrocarbons (PAHs).

OU03 Groundwater Enhancements

Construction began in 2010 to mitigate contaminated groundwater discharge from OU03 to Smokes Creek. A Slurry Wall Containment System, an Interim Cover System, and Groundwater/Leachate Collection, Conveyance, and Pretreatment System were installed. However, recent monitoring shows that groundwater contamination remains outside of the OU03 Containment System. To address this contamination four pumping wells will be installed to capture this groundwater for treatment.

OU03 Final Cap Modification

The Final Cover System will be modified to accommodate the additional material from OU02. The cover system will consist of a geo-synthetic clay liner, high-density polyethylene geo-membrane liner, geo-composite drainage layer, 18-inch low-permeability barrier soil layer, and 6-inch vegetated soil cover. The final cover system will reduce infiltration of precipitation, promote storm water run-off, and eliminate the potential for direct contact with the waste fill. The cover system also includes a gas venting system.

Site Background

Location: The Tecumseh Redevelopment Inc. (TRI) site is an approximately 500 acre portion of the former Bethlehem Steel Corporation facility in Lackawanna. The TRI property is located between the Metroport Ship Canal and Lake Erie to the west. The property also extends to the south of Smokes Creek along Lake Erie.

Contamination: Site investigations were conducted primarily by Bethlehem Steel Corporation before that company filed for bankruptcy in 2001. Tecumseh Redevelopment Inc., a wholly owned-subsiary of ArcelorMittal USA, Inc., completed and submitted the final site investigation report.

The investigation identified approximately 40 discrete locations, called Solid Waste Management Units (SWMUs), on the TRI Site that exhibit soil/fill and/or groundwater contamination. The United States Environmental Protection Agency and the DEC determined that these locations required further investigation and/or clean-up. The SWMUs are located in the vicinity of the former coke plant, former fuel storage area and slag fill areas along the western part of the site, where solid and/or hazardous waste from former steel-making operations were spilled or disposed many years ago by BSC. Contaminated sediment was also found to be present in several watercourses including Smokes Creek.

Several interim cleanup actions have been undertaken by Tecumseh since 2005 to restrict the migration of contamination from the site, including:

- Installing and operating a groundwater collection and treatment system in the coke by-

- products yard near the south-eastern end of the coke batteries;
- Installing a slurry wall, interior groundwater collection system, leachate/groundwater treatment system, and an interim cover system at the ATP (OU03);
- Collecting, treating and disposing or recycling residual wastewater and tar from various pipes, tanks, vessels and containment areas; and
- Dredging contaminated sediment and restoring flood water flow capacity from the lower reach of Smokes Creek to reduce the potential for upstream flooding.

Additional site details, including environmental and health assessment summaries, are available on DEC websites at:

<http://www.dec.ny.gov/chemical/55843.html> and
<http://www.dec.ny.gov/cfmx/extapps/derexternal/haz/details.cfm?pageid=3&progno=915009>.

We encourage you to share this fact sheet with neighbors and tenants, and/or post this fact sheet in a prominent area of your building for others to see.

Whom to Contact

Comments and questions are always welcome and should be directed as follows:

Project Related Questions

Stan Radon
Department of Environmental Conservation
Division of Environmental Remediation
270 Michigan Ave.
Buffalo, NY 14203
716-851-7220
stanley.radon@dec.ny.gov

Site-Related Health Questions

Matthew Forcucci
New York State Department of Health
584 Delaware Ave.
Buffalo, NY 14202
716-847-4501
BEEI@health.ny.gov

Where to Find Information

Project documents are available at the following location to help the public stay informed.

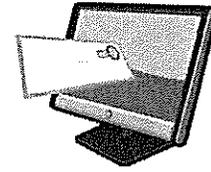
Lackawanna Public Library
560 Ridge Road
Lackawanna, NY 14218

Project documents are also available on DEC website at:
<http://www.dec.ny.gov/chemical/55843.html>.

For More Information

Receive Site Fact Sheets by Email

Have site information such as this fact sheet sent right to your email inbox. DEC invites you to sign up with one or more contaminated sites county email listservs available at the following web page: www.dec.ny.gov/chemical/61092.html . It's *quick*, it's *free*, and it will help keep you *better informed*.



As a listserv member, you will periodically receive site-related information/announcements for all contaminated sites in the county(ies) you select.

Note: Please disregard if you already have signed up and received this fact sheet electronically.





FACT SHEET

State Superfund Program

Receive Site Fact Sheets by *Email*. See "For More Information" to Learn How.

Site Name: Gastown MGP Tonawanda
DEC Site #: 915171
Address: 126 East Niagara Street; Tonawanda, NY 14150
Website: <http://www.dec.ny.gov/chemical/58387.html>

Have questions?
See
"Who to Contact"
Below

Cleanup Action to Begin at State Superfund Site

Action is about to begin that will address the contamination related to the Gastown MGP Tonawanda site ("site") located at 126 East Niagara Street, Tonawanda, Erie County under New York's State Superfund Program. Please see the map for the site location.

The site is listed as a "Class 2" site in the State Registry of Inactive Hazardous Waste Sites (list of State Superfund sites). A Class 2 site represents a significant threat to public health or the environment; action is required.

Documents related to the cleanup of this site can be found at the locations identified below under "Where to Find Information." The cleanup activities will be performed by National Fuel Gas with oversight provided by New York State Department of Environmental Conservation (DEC).

Highlights of the Upcoming Cleanup Activities

The goal of the cleanup action for the site is to achieve cleanup levels that protect public health and the environment. The cleanup action for the site includes:

1. Three of the 8 businesses on the site have been relocated temporarily to allow demolition of four buildings in order to access the contamination beneath them.
2. Contaminated onsite areas will be excavated to approximately 6 feet depth.
3. Deeper contamination onsite will be permanently immobilized in place using in-situ solidification.
4. Two underground collection trenches will be constructed immediately east and west of the Sportsmen's Club and another one will be constructed along the shore of Tonawanda Creek to prevent any contaminants under the remaining buildings and other inaccessible areas from migrating offsite.
5. The foundation of the one remaining gas holder will be excavated and removed.
6. Sediment along the south shore of Tonawanda Creek, just east of the railroad bridge, will be removed over an area approximately 80 by 160 feet, and piped under East Niagara Street to the empty holder excavation. The holder excavation will be used to dewater the sediments, which will be solidified in place after dewatering. Any excess sediments will be transported offsite for treatment and disposal.
7. Two wells to collect contaminated groundwater will be installed west of the site, west of the rail line.

8. Although no impact to indoor air has been detected to date, the existing sub-slab depressurization systems which were installed in five residential dwellings and the Open Bible Baptist School will remain in place for the foreseeable future.

9. Since the remedy will result in contamination above unrestricted levels remaining at the site, a site management plan (SMP) will be developed and implemented. The SMP will include the institutional controls and engineering controls to:

- (a) address residual contaminated soils that could be excavated from the site during future redevelopment;
- (b) evaluate the potential for vapor intrusion for any buildings developed on the site, including provision for mitigation of any impacts identified;
- (c) provide for the operation and maintenance of the components of the remedy, including collection of contaminants from the three collection trenches;
- (d) monitor the groundwater and soil gas;
- (e) identify any use restrictions on site development or groundwater use; and,
- (f) provide a groundwater monitoring program including installing monitoring wells and sampling them on a periodic basis.

Institutional controls will limit the use and development of the property to commercial or industrial uses only, and will restrict use of groundwater as a source of potable or process water, without necessary water quality treatment as determined by the Erie County Department of Health.

Next Steps

After completion of the cleanup activities, National Fuel Gas will prepare a Final Engineering Report. The Final Engineering Report will describe the cleanup activities completed and certify that cleanup requirements have been achieved or will be achieved.

New York State Department of Environmental Conservation (DEC) will keep the public informed throughout the cleanup of the site.

Background

Location: The Former Gastown MGP Site is located in a small industrial area surrounded by residential neighborhoods in the city of Tonawanda, Erie County.

Site Features: The site, which is flat, is occupied by a complex of commercial buildings. The site is bounded to the west and south by a railroad embankment, to the north by the Tonawanda Creek, a part of the Barge Canal system and to the east by The Gastown Sportsmen's Club.

Current Zoning/Use(s): The site is zoned for commercial and industrial use. The buildings on the site are used by a number of small businesses.

Past Use of the Site: A manufactured gas plant (MGP) was operated at this site by the Tonawanda Gas Light Company, starting in 1884. Initially, gas was manufactured using the coal carbonization process. The carbureted water gas process was added in 1910, and the plant produced gas using both processes until 1921. Both processes produced an oily byproduct, commonly known as coal tar, as the gas was cooled prior to distribution. The tar typically accumulated in the bottom of a circular gas storage vessel known as a relief gas holder. This structure remains in the subsurface at the northeast corner of the site. This tar is the principal contaminant at the site today.

In 1993, DEC's Spills Unit responded to a complaint at the Gastown Sportsmen's Club, near the eastern site boundary, where an unknown petroleum product was entering the basement sump of the club. Investigation revealed that the material found in the sump was likely coal tar related to the MGP next door. DEC investigated the site and in 1998 installed a system to: 1) eliminate to the extent possible the continued entrance of coal tar into the sumps, 2) remove coal tar and contaminated water that did enter the sumps, and 3) vent potentially hazardous organic vapors from the sump area. The system remains in operation today.

A State funded RI was completed in 2004 and the FS was completed in 2005. Coal tar was found to have migrated off site to the east, west and north. A Record of Decision (ROD) was signed in March 2007, requiring installation of sub-slab depressurization systems in several buildings near the site, excavation of source areas, collection trenches to control migration, and sediment removal in Tonawanda Creek.

National Fuel Gas signed a consent order in July 2008 to implement the ROD. Subslab depressurization systems have been installed and are operating. A metal tank (one of the source areas described in the ROD) was removed in late 2009.

In April 2013 an amendment to the ROD was approved. The amendment includes: 1. Use of in-situ solidification resulting in less excavation and less truck traffic, 2. Substituting less intrusive tar collection wells for a 600-foot-long tar collection trench, and 3. The temporary relocation of only 3 of the 8 businesses onsite with less disruption to those businesses remaining onsite during the remediation.

Site Geology and Hydrogeology: There are four geologic units below the site. The first encountered below the ground surface (bgs) is man-made fill, ranging in thickness from a few inches to 22 feet. A recent alluvium deposit, made up largely of interbedded layers of sand and silt, lies beneath the fill. This unit extends down to a depth ranging from 12 to 24 feet bgs. Underlying the alluvium is a layer of coarser sand and gravel, which in turn is underlain by a red clay, which is the hydraulic base at this site.

The water table is typically 6 feet bgs. Groundwater flow is primarily to the north, towards Tonawanda Creek. There are also components of groundwater flow both to the east and to the west. This groundwater flow pattern has resulted in the migration of contamination in three directions.

Additional site details, including environmental and health assessment summaries, are available on DEC's website at <http://www.dec.ny.gov/chemical/58387.html> and <http://www.dec.ny.gov/cfmx/extapps/derexternal/haz/details.cfm?pageid=3&progno=915171>

State Superfund Program: New York's State Superfund Program (SSF) identifies and characterizes suspected inactive hazardous waste disposal sites. Sites that pose a significant threat to public health and/or the environment go through a process of investigation, evaluation, cleanup and monitoring.

DEC attempts to identify parties responsible for site contamination and require cleanup before committing State funds.

For more information about the SSF, visit: <http://www.dec.ny.gov/chemical/8439.html>

FOR MORE INFORMATION

Where to Find Information

Project documents are available at the following locations to help the public stay informed.

City of Tonawanda Public Library
333 Main Street
Tonawanda, NY 14150

DEC Central Office
Attn: Richard Dana
625 Broadway
Albany, NY 12233
Richard.dana@dec.ny.gov

DEC Region 9 Office
270 Michigan Avenue
Buffalo, NY 14203
716-847-4501
(call for appointment)

Who to Contact

Comments and questions are always welcome and should be directed as follows:

Project Related Questions

Richard Dana
Department of Environmental Conservation
Division of Environmental Remediation
625 Broadway
Albany, NY 12233
518-402-9680
richard.dana@dec.ny.gov

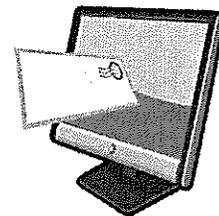
Site-Related Health Questions

Matthew Forcucci
New York State Department of Health
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