DECLARATION FOR THE RECORD OF DECISION

Site Name and Location

Claremont Polychemical, Old Bethpage, Nassau County, New York

Statement of Basis and Purpose

This decision document presents the selected remedial action for the second operable unit at the Claremont Polychemical site, in Nassau County, New York, developed in accordance with the Comprehensive Environmental Response, Compensation and Liability Act, as amended by the Superfund Amendments and Reauthorization Act and, to the extent practicable, the National Contingency Plan. This decision is based on the administrative record for this site. The attached index (Appendix C) identifies the items that comprise the administrative record upon which the selection of the remedial action is based.

The State of New York has concurred with the selected remedy.

Assessment of the Site

Actual or threatened releases of hazardous substances from this operable unit, if not addressed by implementing the response action selected in this Record of Decision, may present an imminent and substantial endangerment of public health, welfare, or the environment.

Description of the Selected Remedy

This operable unit is one of two being conducted at the site. It addresses the wastes in containers (drums, bags, etc.), aboveground tanks, wastewater treatment basins, and a sump discovered at the site. The other operable unit will involve overall site remediation including soil and groundwater.

The major components of the selected remedy include:

- Compatibility testing of all wastes;
- Bulking and consolidation of compatible wastes;
- Transportation of wastes to an off-site treatment, storage or disposal (TSD) facility; and
- Treatment as appropriate at the TSD facility (e.g. incineration, solidification, landfilling, etc.)

Declaration

The selected remedy is protective of human health and the environment, complies with Federal and State requirements that are legally applicable or relevant and appropriate to the remedial action, and is cost effective. This remedy utilizes permanent solutions and alternative treatment (or source recovery) technologies to the maximum extent practicable and satisfies the statutory preference for remedies that employ treatment that reduces toxicity, mobility, or volume as a principal element. Because the remedy for this operable unit will not result in hazardous substances remaining on-site above health based levels, the five-year review will not apply to this action.

William J. Muszynski

William J. Muszynski, P.E.
Acting Regional Administrator

Sept. 22, 1989

Date

DECISION SUMMARY
CLAREMONT POLYCHEMICAL SITE
OPERABLE UNIT II

OLD BETHPAGE, NASSAU COUNTY
NEW YORK

United States Environmental Protection Agency
Region II, New York

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SITE NAME AND LOCATION

The Claremont Polychemical site is an abandoned production facility located in central Long Island, Village of Old Bethpage, Town of Oyster Bay, Nassau County, New York (see Figure 1). The facility is situated in an area comprised of light industrial, commercial and institutional properties (Oyster Bay Solid Waste Disposal Complex, SUNY Agricultural and Technical College at Farmingdale, and Bethpage State Park). Adjacent to the site at its southwest corner is Park Stables where privately boarded horses and publicly available mounts are maintained. Bridle paths exist in the State park. The Suffolk County line is approximately 800 feet east of the site.

In 1985, Old Bethpage had a population of 5,881 persons and Oyster Bay had a population of 305,750 persons, according to the Current Population Report (U.S. Bureau of Census, 1987). The closest residences are less than 1/2 mile away on the west side of the landfill. The nearest public water supply well is located 3,500 feet northwest of the site. Farmingdale water district wells, N1937, N6644, and N7852, are located more than 7,000 feet south, and possibly downgradient, of the site. Groundwater recharge basins are located 1800 and 2,500 feet north, and 1,000 feet south of the site.

SITE HISTORY AND ENFORCEMENT ACTIVITIES

A historical summary of activities associated with the Claremont Polychemical site is presented in Table 1. From 1968 until its closure in 1980, Claremont Polychemical was dedicated to the manufacture of inks and pigments for plastics, vinyl stabilizers, and coated metallic flakes (Durogold). This was the second such facility operated by Claremont Polychemical, as the original plant was located in Roslyn, New York.

The principal wastes generated were organic solvents, resins and wash wastes (mineral spirits). A summary of chemicals known to be used and/or produced on site is presented in Table 2.

The site occupies 9.5 acres on which a 35,000 square foot, one story, concrete building is located (see Figure 2). Located inside the building were a solvent recovery system (steam distillation), two pigment dust collectors and a sump. To the west of the building there are five treatment basins, each with capacity for 5,000 gallons, which contain sludge. Six aboveground tanks, three of which contain wastes, are located east of the building. Other features found include: an underground tank farm, leaching basins, dry wells, and a water supply well.

Concern for contamination was linked to a discovery in 1979 by the Nassau County Department of Health (NCDH) of approximately 2,000 to 3,000 drums scattered about, some uncovered and others

leaking. By September 1980, most of the drums were sorted and either removed from the site, or reused in the plant. Some of the material was burned in the plant's boiler. NCDH inspectors noted at the time that an area east of the building (spill area) was contaminated with organic solvents as a result of accidental and/or incidental spills and discharges. A subsequent remedial action excavated the upper ten feet of a seventy-five foot by seventy-five foot area. The excavated material was placed on a plastic liner. Over the years, this liner has degraded and no longer forms an impermeable layer. Groundwater samples from a monitoring well installed at the time indicated the presence of groundwater contamination directly under the site.

Claremont Polychemical and its affiliated companies entered into receivership in 1980. In 1983, Woodward-Clyde Consultants, under the direction of the New York State Department of Environmental Conservation, conducted a preliminary investigation of the site. In 1984, Velzy Associates conducted a limited study of the site for the property owners. Additional work was performed by C.A. Rich Consultants in response to a request for information by the U.S. Bankruptcy Court. For the last four to five years and under the supervision of the New York Bankruptcy Court, two tenant businesses have been operating at the site.

On December 4, 1987, EPA issued a special notice letter to Mr. Walter Neitlich (Claremont Polychemical officer) requesting a good faith offer to undertake or finance the remedial investigation and feasibility study (RI/FS). No response was received from Mr. Neitlich or a company representative and in March 1988, EPA obligated funds and started a comprehensive RI/FS. On June 7, 1988, EPA conducted a site visit, and later completed an inventory of the approximately 700 drums and bags found on-site. EPA sampled the content of the treatment basins, aboveground tanks, some of the drums, the floors and the air inside the building. The drums and bags hold numerous chemicals, including aluminum metal powder, flammable solvents, cadmium, zinc, antimony and lead based pigments, epoxy, acrylic and vinyl resins, organic based inks, and other unknown compounds. At the time many of the containers were open, leaking, or in poor condition.

During the removal action conducted in October 1988, the liquid contents of the treatment basins were removed, and the structures covered and snow-fenced. The drums and bags were classified in general categories (i.e. organic, explosive, acid, etc.) based on their labels and information obtained from Mr. Neitlich, overpacked as necessary, staged, and secured inside the building pending disposal.

A second operable unit (OU-II) was initiated on March 1989 to deal with the disposal of the wastes storage in the containers, aboveground tanks, basins, and a sump. Twenty percent (20%) of

the unknown containers and ten percent (10%) of all the other categorized containers were sampled to determine and/or confirm their constituents. Samples were also collected from the small sump found inside the building.

HIGHLIGHTS OF COMMUNITY PARTICIPATION

The RI/FS and Proposed Plan for the Claremont Polychemical site were released to the public in July 1989. These two documents were made available to the public in both the administrative record and the information repository maintained at the EPA Docket Room in Region 2 and at the Plainview-Old Bethpage Public Library. A press release concerning the availability of the RI/FS reports, the Proposed Plan, and the initiation of the public comment period was issued on July 14, 1989. A notice of the availability of these two documents was published in the Plainview-Old Bethpage Herald on July 27, 1989, This Week on July 22, 1989, and the Bethpage Tribune on July 21, 1989. A public comment period was held from July 14, 1989 through August 14, 1989. In addition, a public meeting was held on August 1, 1989. At this meeting, representatives from EPA and the New York State Department of Environmental Conservation answered questions about problems at the site and the remedial alternatives under consideration. A response to the comments received during this period is included in the Responsiveness Summary, which is part of this Record of Decision. This decision document presents the selected remedial action for the Claremont Polychemical site, in Old Bethpage, Nassau County, New York, chosen in accordance with CERCLA, as amended by SARA and, to the extent practicable, the National Contingency Plan. The decision for this site is based on the administrative record.

SCOPE AND ROLE OF OPERABLE UNIT

EPA divided the remedial work being conducted at the Claremont Polychemical site into two operable units. The first operable unit addresses overall site remediation (soil and groundwater contamination) and is presently being conducted by Ebasco Services, under EPA supervision. The second operable unit deals only with the wastes held in containers, aboveground tanks, treatment basins, and a sump discovered at the site. These wastes pose a direct threat to human health and the environment because of the risks from possible releases into the environment. The purpose of this action is to eliminate present and future exposure to the identified wastes.

SITE CHARACTERISTICS

Data generated during past and present investigations were evaluated and incorporated into the present study. In general, the wastes present at the Claremont Polychemical site (containers, tanks, basins and sump) are a combination of raw

materials, finished products and process wastes typical of this type of production facility. The materials contained in the tanks and basins are clearly associated with the Durogold process. Runoff produced inside the building as a result of the leaking roof appears to be the principal source of the liquid found in the sump. Although some process wastes may be present, the assortment of containers appears to be dominated by raw materials and finished products of high organic and inorganic content.

It is difficult to assess the total volume of wastes at the site because of the assortment of container sizes and the extent to which they are completely full. The total amount of solid material could be as high as one hundred thousand (100,000) pounds. Liquid wastes and sludge are estimated at approximately ten thousand (10,000) gallons and twenty-five thousand (25,000) gallons, respectively. The chemical composition of the wastes is discussed below.

Containers

In order to facilitate the discussion of the containers' sampling conducted as part of this operable unit, the results will be presented as a function of the staging categories developed during the removal action (see Table 3). One hundred and six (106) containers were sampled, at a rate of twenty (20%) percent of the unknown and ten (10%) percent of each of the other known categories. Each was analyzed for one or more of the following parameters: volatile organic aromatic compounds (VOA's), base neutral or extractable aromatic compounds (BNA's), metals, cyanide and ignitability. A generalized summary of the hazardous substances detected in containers is presented in Table 4.

Containers classified as organic solid consisted mostly of resins and other polymers, some containing 1,2,4-trichlorobenzene. The acid solid samples showed a high concentration of benzoic acid and low concentrations of heavy metals. Of the caustic solid samples analyzed, some contained zinc, lead, and chromium. Inorganic pigment solid samples contained chromium, nickel and lead. The chemical composition of the unknown solid samples included arsenic and lead. Of the miscellaneous solid samples analyzed, one contained 2-butanone and aluminum.

Organic liquid wastes consist mostly of resins and polymers containing benzoic acid, toluene, xylene and methylene chloride. Acid liquid samples were high in extractable organics. The containers in the unknown liquid group presented concentrations of compounds such as toluene, bis(2-ethylhexyl)phthalate, chloroform, methylene chloride, tetrachloroethene, cadmium and lead; two thirds of the samples tested were ignitable. Miscellaneous liquid samples contained lead and chromium.

Aboveground Tanks and Treatment Basins

Although there was some variation in the relative concentration of the compounds found, the wastes held in the aboveground tanks and treatment basins appear to have a common origin since their chemical compositions are similar (see Table 5). Significant amounts of both organic and inorganic compounds were detected including several CERCLA hazardous substances such as methylene chloride, bis(2-ethylhexyl)phthalate, copper, lead and zinc. None of the samples analyzed exhibited characteristics of acidity or reactivity.

Sump

With the exception of bis(2-ethylhexyl)phthalate (360 ug/kg), no organic or inorganic compounds were detected.

SUMMARY OF SITE RISKS

The removal of the characterized wastes would reduce the threat of release to the environment. The major concerns addressed in this operable unit include:

- Threat of exposure and/or fire due to the presence of explosive (aluminum powder) and flammable (e.g. 2-butanone) substances;
- Release of hazardous substances into the environment as a result of the continued deterioration of the containers (drums, bags, etc.);
- Overflow of treatment basins and release of their hazardous contents onto the ground with subsequent migration into the aquifer; and
- Formation of atmospheres immediately dangerous to life and health inside the building due to the escape of volatile substances from deteriorated containers.

The risks considered in this operable unit were related to the safety of the workers on-site, and the safe transport of wastes to an off-site TSD facility. Any risk resulting from residues left on-site will be evaluated in the risk assessment for the RI/FS currently being conducted as part of the overall site remediation.

DESCRIPTION OF ALTERNATIVES

Following a screening of remedial technologies in accordance with the NCP, three remedial alternatives were developed. Those technologies not incorporated into the alternatives were

eliminated due to technical considerations such as effectiveness, implementability and cost. The alternatives considered are detailed below:

ALTERNATIVE 1 - NO ACTION

- o No remedial measures would be implemented

ALTERNATIVE 2 - CONTAINMENT

- o Compatibility testing
- o Bulking and consolidation
- o On-site storage

ALTERNATIVE 3 - OFF-SITE TREATMENT

- o Compatibility testing
- o Bulking and consolidation
- o Transportation off-site
- o Treatment at off-site TSD facility; incineration, solidification, landfill

A. Alternative 1 - No Action

Capital Cost:	$ 0
Annual O & M Cost:	0*
Present Worth Cost:	0*
Time to Implement:	Immediately

*NOTE: Periodic evaluation and monitoring would be conducted as part of the overall remedy for the site and, therefore, would not be included in the O & M cost for the alternatives considered for this operable unit.

The no action alternative provides a baseline for comparing other options. In this case, "No Action" would mean that no specific remedial measures (i.e. treat, remove or contain) would be implemented to minimize the threat posed by the wastes held in the containers, basins, aboveground tanks, and sump.

No attenuation of the source of contamination would be provided. The threat to human health and the environment would persist as the treatment basins continue to fill and possibly overflow; the containers would continue to deteriorate. Reduction of toxicity, mobility and volume would not be achieved.

The no action alternative is not considered protective of human health and the environment.

B. Alternative 2 - Containment

Capital Cost:	$ 325,000
Annual O & M Cost:	0*
Present Worth Cost:	325,000
Time to Implement:	6 months

*NOTE: Periodic evaluation and monitoring would be conducted as part of the overall remedy for the site and, therefore, would not be included in the O & M cost for this alternative.

The containment alternative entails performing on-site compatibility testing involving the contents of each of the holding units to determine which wastes would be consolidated. Bulking and consolidation would segregate the wastes into general disposal categories based on their physical and chemical characteristics. Temporary storage tanks would be brought to the site and the holding units contents would be consolidated into a relatively small number of tanks. The material which could not be consolidated would be overpacked (if necessary) in 55-gallons drums. The empty drums would be crushed and stored on-site. Interactions between the various components of the bulked waste which could not be foreseen by the original compatibility testing could occur during extended periods of storage.

This alternative was rejected for further evaluation in the FS because it was not effective in protecting human health and the environment. Containment of wastes on-site does not provide a permanent solution to the problem as no significant reduction of toxicity or volume of wastes would be achieved.

C. Alternative 3 - Off-site Treatment

Capital Cost:	$ 1,339,000
Annual O & M Cost:	0
Present Worth Cost:	1,339,000
Time To Implement:	6 months

This alternative involves performing on-site compatibility tests on the contents of each treatment basin, aboveground tank, sump and container. Based on the information provided by the compatibility check, the wastes would be segregated into general disposal categories according to their physical and chemical characteristics, and consolidated. The contents of the aboveground tanks, basins and sump would be pumped into storage tanks. Composite samples of the drums and/or bulked chemicals from each waste stream would undergo rigorous analytical testing to determine the most appropriate treatment/disposal methods. The analytical results of the one hundred and six (106) samples collected as part of RI/FS for this operable unit would be used to limit the amount of sampling.

Once EPA selects the treatment technology and TSD facility most appropriate for each waste stream, the contaminated material would be transported to an approved Resource Conservation and Recovery Act (RCRA) facility or to an appropriate waste disposal facility. Several types of technologies (solidification, stabilization, incineration, chemical/biological treatment, landfill, etc.) would be used due to the variety of wastes present (organic, inorganic and mixed wastes). The selected treatment technologies would reduce or eliminate the toxicity, mobility and volume of wastes.

Treatment technologies are well developed and highly effective means of disposing of the types of hazardous wastes found at the site. Lead time for acceptance at TSD facilities is dependent upon the availability of capacity at commercial facilities, and could extend the implementation period of this alternative. However, long-term management would not be required since the wastes would be removed from the site. This alternative is most feasible when small volumes of hazardous waste are present, as is the case at Claremont Polychemical. Monitoring would only be required during sampling and handling operations. Permits for transportation to an off-site TSD facility would be obtained. Treatment and/or disposal would be performed at a fully permitted RCRA hazardous waste treatment and disposal facility. Wastes would be disposed of in accordance with land disposal restrictions. Since all the wastes would be treated/disposed off-site, no treatment residue would be left on-site.

The empty drums would be crushed and sent to an off-site facility. In order to prevent future accumulation of rainwater in the treatment basins and sump, the connecting trenches/drains would be covered or filled.

Since the specific types of technologies and the precise volume of waste to be treated within each technology would be determined at a later stage, the cost estimate has been conservatively based assuming incineration is the means of treatment. Incineration is usually the most cost intensive of the treatment technologies considered and, therefore, would provide a conservative estimate of the costs to be incurred as part of this remedy. The total cost for this action is $1,339,000. This includes mobilization, sampling, handling, disposal, demobilization, and other expenses.

SUMMARY OF COMPARATIVE ANALYSIS OF ALTERNATIVES

EPA has developed nine criteria (OSWER Directive 9355.3-01) to evaluate potential alternatives to ensure all important considerations are factored into remedy selection decisions. They are summarized below:

- Overall protection of human health and the environment

- o Compliance with applicable or relevant and appropriate requirements (ARARs)
- o Long-term effectiveness and permanence
- o Reduction of toxicity, mobility, or volume
- o Short-term effectiveness
- o Implementability
- o Cost
- o State acceptance
- o Community acceptance

A summary of the comparative analysis of the alternatives is presented in Table 6.

1. Overall Protection of Human Health and the Environment

Alternative 3 is considered fully responsive to this criterion and to the identified remedial response objectives.

Removal of the wastes and treatment at an off-site facility (alternative 3) would prevent their release to the environment and would constitute excellent protection of both public health and the environment. Whereas, the no action alternative would not be protective of human health or the environment.

2. Compliance with ARARs

Remedial alternative 3 would include the on-site testing of wastes and some consolidation (as needed). Activities related to the on-site handling and transportation/treatment of wastes at an off-site TSD facility would be in compliance with the following ARARs:

- o RCRA 40 CFR Subpart 268 - Land Disposal Restrictions
- o RCRA 40 CFR Part 263 - Standards Applicable to Transport of Hazardous Wastes
- o RCRA 40 CFR Part 264 - Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities
- o 6 NYCRR Part 372 - Hazardous Waste Manifest System & Related Standards for Generators, Transporters and Facilities

- o 6 NYCRR Subpart 373-1,2,3 - Final State Standards for Owners and Operators of Hazardous Waste Treatment, Storage and Disposal Facilities

- o 6 NYCRR Part 371

The transportation and treatment of wastes at an off-site TSD facility would be accomplished in accordance with New York State hazardous waste management requirements. The off-site TSD facility would be fully RCRA permitted and, therefore, would meet applicable regulations. RCRA listed wastes would be treated using specific technologies or specific treatment levels, as appropriate, to comply with land disposal restrictions. Alternative 1 (no action) would not meet ARARs related to the storage of hazardous wastes.

3. Long-Term Effectiveness

Alternative 3 would aid in the long-term remediation of the site as wastes would be removed, eliminating the potential threat to human health and the environment. Any adverse impact on human health associated with any remaining concentration of wastes would be addressed as part of the overall RI/FS. There are no adverse long-term effects on human health that would result from the implementation of this alternative.

Off-site treatment (alternative 3) provides a permanent remedy, and no long-term monitoring would be required after implementation. Alternative 1 would not result in long-term remediation of the site as deterioration of containers and overflow of basins into the soil and groundwater could occur in the future.

4. Reduction of Toxicity, Mobility and Volume

Treatment represents a permanent remedy. Treatment would reduce the toxicity, mobility and volume of the contaminants from the basin, tanks, sump and containers. The no action alternative would not result in a reduction of toxicity, mobility or volume.

5. Short-Term Effectiveness

The short-term effectiveness concerns for the off-site treatment alternative include human health threats, adverse impacts on the environment, and safety of workers during implementation activities. The major activities of this alternative are the pumping of sludge contained in the sump, tanks and basins, the consolidation of wastes, and the transport of wastes for off-site treatment. A potential health threat to area residents would be direct contact with spilled wastes. However, this exposure pathway will be eliminated by restricting access to the site to authorized personnel only. The implementation of the alternative

would be monitored to ensure that all regulations are followed and to minimize worker exposure. Therefore, the short-term human health threat resulting from this alternative would not be significant.

The short-term impacts of alternative 3 on the environment would consist mostly of traffic-related problems during transportation. Although decontaminated and covered, passage of trucks through communities might raise community concerns.

Workers on-site during activities could be potentially exposed to contaminants. To minimize and/or prevent such exposures, use of personal protection equipment would be necessary.

No adverse impacts and threats to the human health or the environment are foreseen as the result of implementing alternative 3.

Alternative 1 would not directly improve the site environment or minimize the exposure pathways.

6. Implementability

Alternative 3 would not require substantial construction, institutional controls or a monitoring program since the bulk of the activities would be conducted off-site. Commercial treatment facilities are already in existence. No technological problems should arise as all the treatment technologies are well established and possess proven track records.

The quantity of waste to be treated from this site is relatively small and is not expected to be affected by the general market availability. However, depending on the TSD facility, a lead time for waste acceptance at the treatment facility may be needed.

7. Cost

As several treatment technologies would be used, assumptions need to be made in order to develop a conceptual cost for alternative 3. The most significant assumption is the use of incineration as the treatment technology to treat/dispose of all the wastes. Incineration is usually the most cost intensive treatment technology and, therefore, will provide a conservative estimate of the costs to be incurred as part of this remedy. The total cost for this action is $1,339,000. A summary of the cost is provided below.

Mobilization	$ 14,000
Sampling, Handling & Disposal	
Containers (drums, bags, etc.).....	$ 612,000
Tanks, Basins and Sump.....	$ 258,000

Demobilization	$ 7,000
Contingency	$ 345,000
Other Costs	$ 103,000
Total	$ 1,339,000

O & M costs (evaluation, monitoring, etc.) for the alternatives considered in this operable unit would be conducted under the overall remedy.

8. State Acceptance

The State of New York concurs with the preferred alternative selected, off-site treatment (see Appendix D). This alternative is in agreement with the State's interest in public and environmental protection, since the remedy utilizes permanent treatment to the maximum extent practicable.

9. Community Acceptance

The community has expressed its preference for Alternative 3: off-site treatment. Several concerns were raised during the public comment period. These concerns are addressed in detail in the Responsiveness Summary (Appendix E). In general, the principal concerns are related to potential health risk to the people living or working around the site.

SELECTED REMEDY

The selected remedy for the remediation of the wastes stored in the containers, basins, aboveground tanks, and a sump located at the Claremont Polychemical Superfund site is Alternative 3: Off-site Treatment.

This remedy addresses one of the principal threats at the site, namely, the potential release of contaminants to the environment by removing the materials and treating them at an off-site TSD facility.

Under this remedy, action would be taken to remove the wastes held in the containers, basins, aboveground tanks, and sump from the site and properly dispose of them in the most efficient and least expensive manner. Bulking would be conducted to the extent practical prior to disposal. Water movement into the basins would be severed in order to avoid overflows and accumulation of runoff.

This action mitigates potential for explosion, deterioration of containers, and overflow of treatment basins. Further deterioration of the containers greatly increases the likelihood that atmospheres immediately dangerous to life and health will be exceeded inside the building, affecting the nearby workers. In the event of fire and/or explosion, a toxic plume could develop

threatening nearby residents or travelers.

The estimated cost for all tasks associated with this remedy is $1,339,000. The tasks identified as part of this remedy are: mobilization, sampling, handling, disposal and demobilization.

STATUTORY DETERMINATIONS

The remedy selected by EPA in consultation with NYSDEC, off-site treatment, meets the statutory requirements of CERCLA section 121. A brief description of how the remedy complies with the statutory requirements is presented below.

1. Overall Protection of Human Health and the Environment

Removal of the wastes and treatment at an off-site facility will prevent their release to the environment and will constitute excellent protection of both human health and the environment. This action mitigates the potential for fire/explosion, deterioration of containers, overflow of basins, and development of hazardous atmospheres inside the building. The selected remedy will not pose unacceptable short-term risks or cross-media impacts.

2. Compliance with ARARs

This remedy will include the on-site testing of wastes and some consolidation (as needed). Activities related to the implementation of the selected remedy will be in compliance with the following federal and State applicable regulations:

- RCRA 40 CFR Subpart 268 - Land Disposal Restrictions
- RCRA 40 CFR Part 263 - Standards Applicable to Transport of Hazardous Wastes
- RCRA 40 CFR Part 264 - Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities
- 6 NYCRR Part 372 - Hazardous Waste Manifest System & Related Standards for Generators, Transporters and Facilities
- 6 NYCRR Subpart 373-2 - Final State Standards for Owners and Operators of Hazardous Waste Treatment, Storage and Disposal Facilities
- 6 NYCRR Part 371

The transportation and treatment of wastes at an off-site TSD facility will be accomplished in accordance with New York

hazardous waste management requirements. The off-site TSD facility will be fully RCRA permitted and, therefore, will meet applicable regulations. RCRA listed wastes will be treated using the best demonstrated available technology (BDAT) or to specific treatment levels, as appropriate, in order to comply with RCRA land disposal restrictions.

3. Utilization of Permanent Solutions and Alternative Treatment Technologies to the Maximum Extent Practicable

The selected remedy, off-site treatment, utilizes permanent solutions and treatment technologies to the maximum extent applicable. Alternative 3 is considered to be a permanent remedial action since the wastes will be permanently removed from site. The potential for future release of the waste to the environment will be eliminated. Treatment will reduce and/or eliminate the toxicity, mobility and volume of the contaminants from the basin, tanks, sump and containers.

No adverse impacts and threats to the human health and environment are foreseen as the result of implementing this alternative. Workers on-site during activities could potentially be exposed to contaminants. However, to minimize and/or prevent such exposures, personal protection equipment will be used.

This alternative will not require substantial construction, institutional administration or a monitoring program since the bulk of the activities will be conducted off-site. Commercial facilities are already in existence. No technological problems should arise as all the treatment technologies are well established and possess a proven track record.

4. Preference for Treatment as the Principal Element

The selected remedy fully satisfies this criterion. The variety of wastes found at the site indicates that several treatment methods (e.g. incineration, solidification, etc.) will need to be used. Incineration will be the preferred technology for those materials high in organic content but low in metal content. Those materials primarily high in inorganics (metals) will be treated and possibly landfilled in a RCRA approved facility.

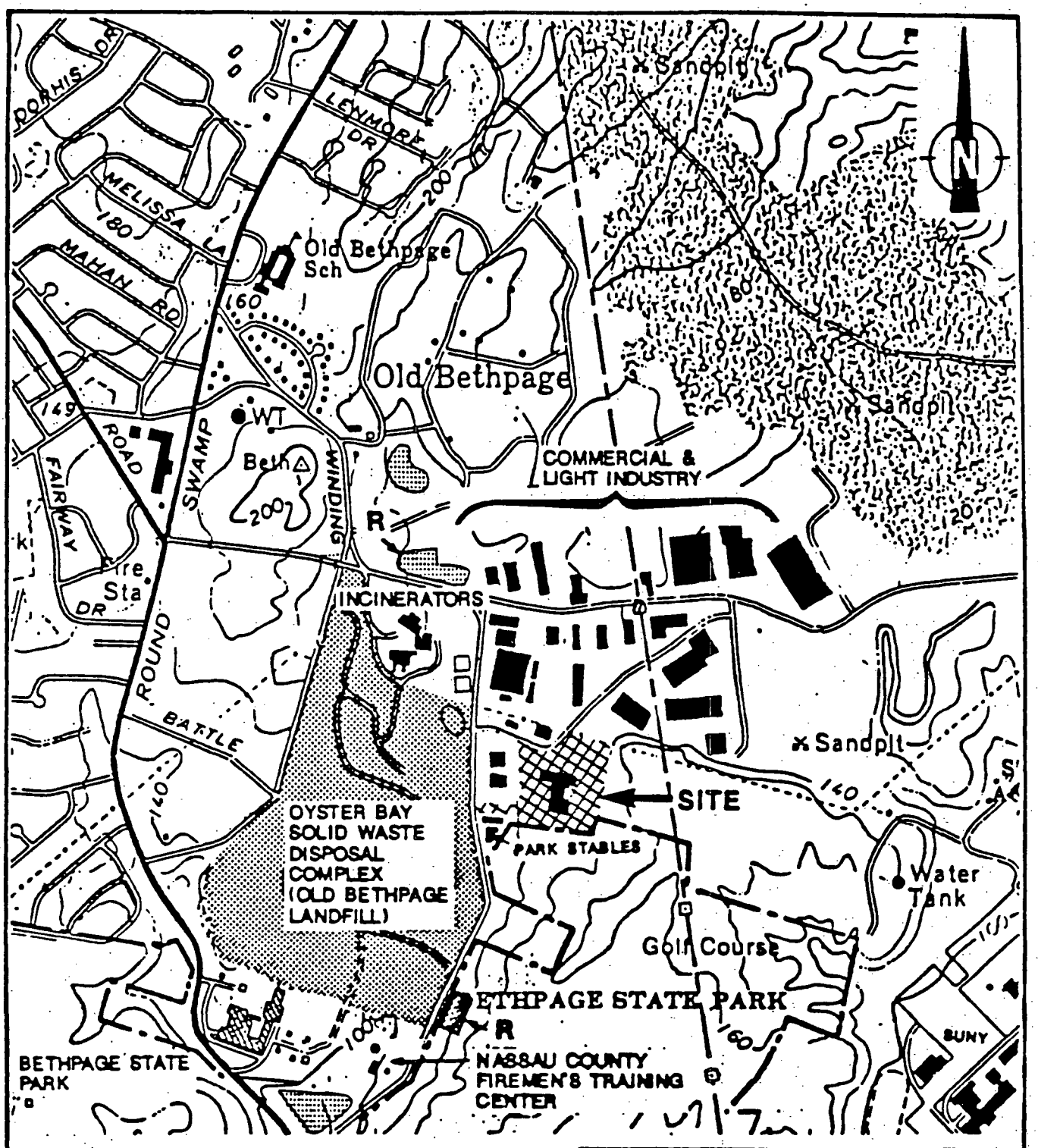
5. Cost Effectiveness

The selective remedy is the most cost effective of the alternatives considered, and provides excellent protection of human health and the environment. Based on the information generated during the RI/FS, the estimated present cost for this alternative is $1,339,000.

DOCUMENTATION OF SIGNIFICANT CHANGES

The Proposed Plan for the Claremont Polychemical site was released to the public in July 1989. The Proposed Plan identified Alternative 3, off-site treatment, as the preferred alternative. EPA reviewed all written and verbal comments submitted during the public comment period. Upon review of these comments, it was determined that no significant changes to the selected remedy, as it was originally identified in the Proposed Plan, were necessary.

APPENDIX A: FIGURES



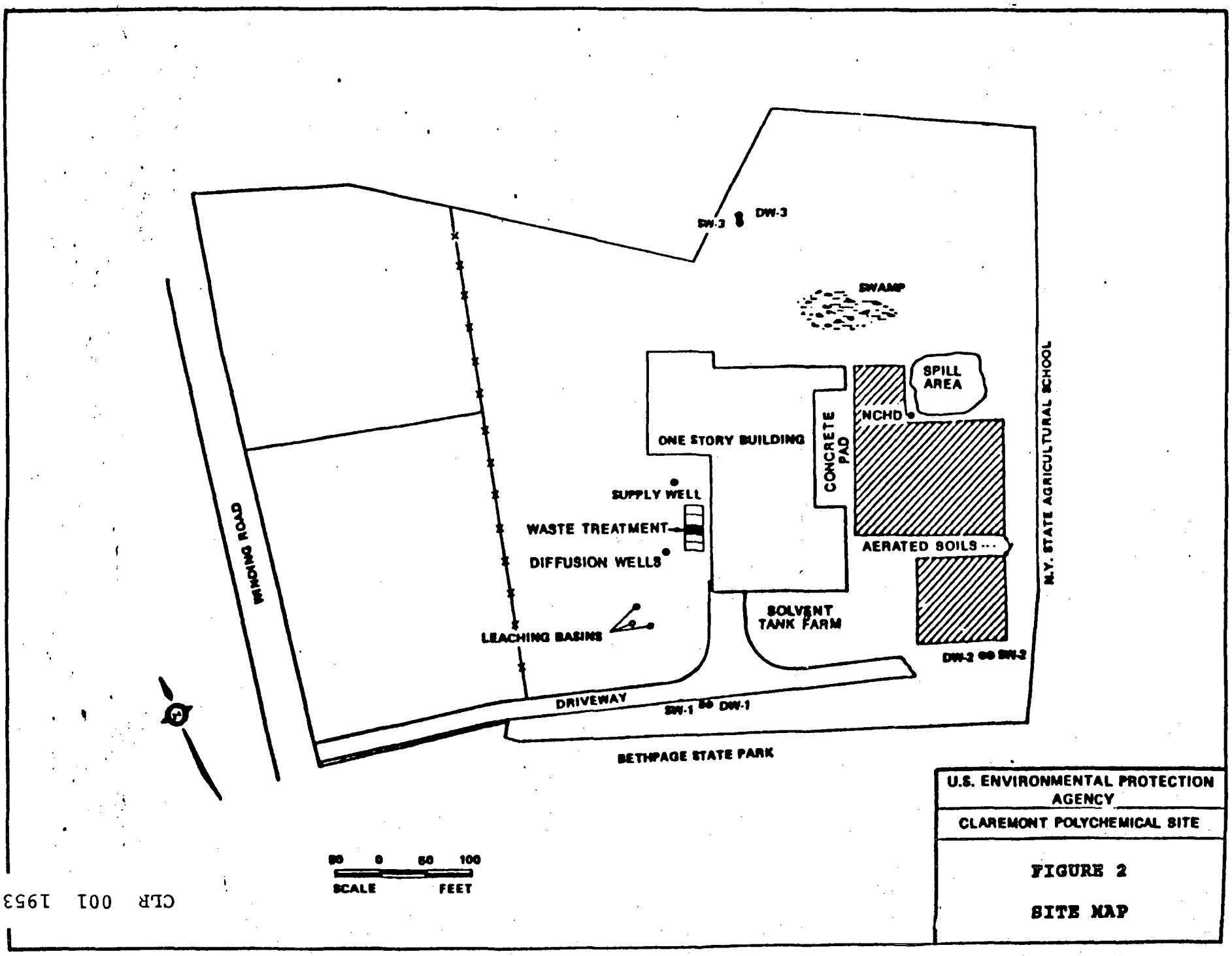
ENVIRONMENTAL PROTECTION AGENCY

CLAREMONT POLYCHEMICAL FACILITY

FIGURE 1

SITE LOCATION

CLR 001 1952


SW-3
DW-3
SWAMP
SPILL AREA
NCHD
ONE STORY BUILDING
CONCRETE PAD
N.Y. STATE AGRICULTURAL SCHOOL
SUPPLY WELL
WASTE TREATMENT
DIFFUSION WELLS
AERATED SOILS
WINDING ROAD
LEACHING BASINS
SOLVENT TANK FARM
DW-2 & SW-2
DRIVEWAY
SW-1 & DW-1
BETHPAGE STATE PARK
50 0 50 100
SCALE FEET
U.S. ENVIRONMENTAL PROTECTION AGENCY
CLAREMONT POLYCHEMICAL SITE
FIGURE 2
SITE MAP

CLR 001 1953

APPENDIX B: TABLES

Table 1. Historical summary of activities associated with the Claremont Polychemical site

	Property	Activity
1966		Fabrication/erection of structural steel of lot 267
1967	Profit Sharing Plan & Trust Agreement of Claremont Poly-Chemical Corp acquires mortgage for lot 267 ($31,254)	Fabrication/construction on lot 267
1968	Winding Rd Properties Inc. becomes owner in fee of lot 267	Claremont Polychemical operations commence at Winding Rd facility
1969	Claremont Polychemical Corp. releases/assigns to Winding Rd Estates, Inc., land, buildings and improvements: parts of lot 267 & 286 ($1.)	Claremont Polychemical operations continue: waste water treatment - sanitary and metals from Durogold process; discharges via septic and leaching systems; buried tanks & piping used for process solvents;
1973	Claremont Polychemical Corp. grants/releases to Winding Rd. Estates, Inc. lots 283 & 295 ($10).	
1977		Leaching pools sampled (Bureau of Water Pollution Control.)
1979		2000-3000 drums of solvents, resins, inks discovered on site.
1980	Winding Rd Estates Inc. & Winding Rd. Properties Inc. enter into mortgage with William Otte (trustee) to secure payments ($55,754,62) to creditors by Winding Rd Recycling Corp., involving lots 267 and 296 (receivership)	October: Excavation of discolored soil layer (75 x 75 x 10 ft) and spreading of it on plastic sheeting; Nassau County Health Dept. sampling (soil, groundwater); excavation stopped due to receivership.

1983	L&L Excavation & Maniac Leasing establish operations on site (approximate)	Woodward-Clyde Consultants investigation of spill area for NY State DEC hazard ranking.
1984		Velzy Associates investigation of spill area for Winding Rd. properties
1986		CA Rich Consultants hydrogeolic investigation of Claremont Polychemical Facility for NY State Dept. of Law; Nassau County Health Dept. sampling (soils)
1988		EPA starts RI/FS (OU-I) to assess extent of soil and groundwater pollution (March)
1988		EPA conducts Removal Action (October)
1989		EPA starts RI/FS (OU-II) to evaluate disposal/treatment of drums, bags, and content of aboveground tanks and treatment basins

Table 2. Chemicals associated with the manufacturing processes at Claremont Polychemical[1], Old Bethpage, New York

PRODUCT	RAW MATERIALS	WASTE PRODUCTS	WASTE TREATMENT
pigments & ink	phthalates vinyl resins polyethylene resins ketones alcohol high flash naphtha	mineral spirits vinyl resins solvents solids	solvent recovery
Durogold	copper zinc	zinc bronze	phosphoric acid, soda ash for neutralization produced Cu & Zn carbonates & phosphates
coated aluminum powder	aluminum sodium silicate	solids in low volume	none-dry process
vinyl stabilizers	barium oxide cadmium oxide high flash naphtha ethyl-hexanoic acid para, tertiary-butyl benzoic acid toluene tetrachloroethylene	"none"	--

[1] Source: M. Neitlich, vice-president, meeting of 6/20/88.

Table 3. Classification used during drum staging and overpacking at Claremont Polychemical, Old Bethpage, New York (7/12/88)

Liquid	Solid
Organic Liquid	Organic Solid
Unknown Liquid	Unknown Solid
Miscellaneous Liquid	Miscellaneous Solid
Acid Liquid	Acid Solid
	Caustic Solid
	Inorganic Pigment Solid

Other
Explosive
Empty

Table 4. Generalized summary of selected hazardous substances detected in containers (drums, bags, etc.) sampled at Claremont Polychemical, Old Bethpage New York (4/89)

Category	Compound	Concentration (mg/kg)
Organic Solid	Benzoic Acid	9,800
	1,2,4 Trichlorobenzene	2,520
	Phenol	100
	1,4 Dichlorobenzene	74
Acid Solid	Benzoic Acid	47,000
Caustic Solid	Zinc	620,000
	Lead	5,336
	Chromium	3,861
Inorganic Pigment Solid	Zinc	440,000
	Lead	78,000
	Chromium	67,000
Unknown Solid	Lead	460,000
	Arsenic	140,000
	Cadmium	2,290
	Bis(2-ethylhexyl)Phthalate	16,000
	Phenol	6,000
Organic Liquid	Toluene	230,000
	Xylene	130,000
	Methylene Chloride	6,250
Unknown Liquid	Bis(2-ethylhexyl)Phthalate	912,000
	2-Butanone	220,000
	Toluene	199,850
	Tetrachloroethene	65,620
	Methylene Chloride	3,125
	Zinc	56,500
	Lead	3,867
	Arsenic	1,068

Table 5A. Chemical composition of the sludge contained in the aboveground tanks at Claremont Polychemical, Old Bethpage, New York (6/7/88)

	Concentration		
	Tank No.1	Tank No.2	Tank No.3
Volatile Organics (ug/kg)			
Acetone*	2,600J	7,800	11,000
Methylene Chloride*	BD	590J	1,900
1,2-Dichloroethene*	1,300J	BD	5,300J
Trichloroethene*	850J	BD	BD
2-Butanone*	BD	14,000	11,000J
Tetrachloroethene*	32,000	49,000	150,000
Toluene*	2,000	18,000	9,000
Semi-volatile Organics (ug/kg)			
Bis(2-ethylhexyl) phthalate*	100,000	33,000,000	12,000,000
Pesticides (ug/kg)			
None detected			
Metals (mg/kg)			
Aluminum	800	553	BD
Calcium	9,560	9,000	10,000
Copper*	13,900	55,400	29,800
Iron	602J	417J	472J
Lead*	1,040	2,430	1,480
Silicon	20,100	16,400	17,300
Zinc*	6,080J	14,300J	8,320J
Corrosivity			
None			

* CERCLA hazardous substance
J estimate
BD below analytical detection limit

Table 5B. Chemical composition of the sludge contained in the treatment basins at Claremont Polychemical, Old Bethpage, New York (6/7/88)

	Concentration			
	Basin D	Basin C	Basin B	Basin A
Volatile Organics (ug/kg)				
Vinyl Chloride*	640J	BD	BD	BD
Acetone*	350	BD	9,000	22,000
Methylene Chloride*	2,700	BD	1,600J	250J
1,2-Dichloroethene*	1,100	BD	BD	3,400
Trichloroethene*	BD	330	1,400J	2,200
2-Butanone*	BD	170J	16,000	3,500
4-Methyl,2-Pentanone*	150J	250J	BD	190J
Tetrachloroethene*	BD	7,100	25,000	18,000
Toluene*	1,400	1,900	12,000	10,000
Benzene*	BD	BD	BD	160J
Semi-volatile Organics (ug/kg)				
Pyrene*	1,800J	BD	BD	BD
Bis(2-ethylhexyl) phthalate*	130,00	190,000	170,000	87,000J
Diethylphthalate*	BD	BD	BD	43,000J
Pesticides (ug/kg)				
None detected				
Metals (mg/kg)				
Aluminum	765	1,380	BD	BD
Calcium	7,670	5,540	2,870	3,450
Copper*	1,670	53,400	17,300	7,400
Iron	736J	813J	BD	754J
Lead*	BD	2,300	674	438
Silicon	22,500	19,300	5,240	7,980
Zinc*	630J	13,200J	3,710J	2,230J
Corrosivity				
None				

* CERCLA hazardous substance
J estimate
BD below analytical detection limit

Table 6. Summary of comparative analysis of remedial alternatives

Remedial Alternative	Protection of Human Health and the Environment	Compliance with ARARs	Long-Term Effectiveness
Alternative 1 No Action	Does not contribute to protection of human health and the environment	Does not comply with ARARs	No long-term beneficial effectiveness results from this alternative
Alternative 3 Off-Site Treatment	Destroys and/or treats contaminants resulting in significant reduction of risks to human health and environment	All ARARs would be meet	Eliminates risks by eliminating wastes No long-term adverse impacts on the environment No long-term monitoring required

Table 6. Summary of comparative analysis of remedial alternatives (continued)

Remedial Alternative	Reduction of Toxicity, Mobility and Volume	Short-term effectiveness	Implementability
Alternative 1 No Action	No reduction of toxicity, mobility and volume would be attained	No short-term beneficial or adverse impacts on public health and the environments result from this alternative	No substantial construction, institutional administration or monitoring is required
Alternative 3 Off-Site Treatment	Alternative results in elimination and/or reduction of toxicity, mobility and volume	Attains immediate risk reduction to human health and environment Short-term effectiveness relative to public health risks, the environment and safety to workers are limited to those resulting from sampling, handling and transportation of the wastes. These can be easily mitigated by implementation of control measurements such as confining the operation area and use of personal protection equipment. Traffic control and spill preventive measures will minimize any adverse environmental impact.	Treatment techniques are well developed, proven and commercially available Commercial availability may be limited for a large quantity of waste, but would not pose a problem for the relatively small quantity of wastes found at the Claremont site.

Table 6. Summary of comparative analysis of remedial alternatives (continued)

Remedial Alternative	Cost (thousands) Capital	O & M	Worth	State Acceptance	Community Acceptance
Alternative 1 No Action	0	0	0	Low State acceptance	Low community acceptance
Alternative 3 Off-Site Treatment	$ 1,339	0	$ 1,339	High State acceptance	High community acceptance

APPENDIX C: ADMINISTRATIVE RECORD INDEX

CLAREMONT POLYCHEMICAL SITE
SECOND OPERABLE UNIT
ADMINISTRATIVE RECORD FILE*
INDEX OF DOCUMENTS

REMOVAL RESPONSE

Correspondence

P. 1-136 Report: On-Scene Coordinator's Report, Claremont Polychemical Corporation, Old Bethpage, Nassau County, New York, prepared by Mr. Nick Magriples, U.S. EPA, (undated).

REMEDIAL INVESTIGATION

Remedial Investigation Reports

P. 137-262 Report: Final Remedial Investigation Report, Second Operable Unit OU-II, Claremont Polychemical Site, New York, prepared by U.S. EPA, 7/89. References are listed on P. 190.

FEASIBILITY STUDY

Feasibility Study Reports

P. 263-346 Report: Final Feasibility Study Report, Second Operable Unit OU-II, Claremont Polychemical Superfund Site, Old Bethpage, Nassau County, New York, prepared by U.S. EPA, 7/89. References are listed on P. 312.

Correspondence

P. 347-347 Letter to Mr. Carlos Ramos, U.S. EPA, from Mr. William G. Lowden, State of New York Department of Health, re: Comments on the Draft Proposed Remedial Action Plan and the Draft Feasibility Study Report, 7/10/89.

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* Administrative Record File available 8/22/89.

Note: Company or organizational affiliation is mentioned only when it appears in the record.

P. 348-349 Letter to Mr. Carlos R. Ramos, U.S. EPA, from Ms. Patricia Primi, State of New York Department of Law, re: Comments on the Draft Remedial Investigation Report OU-II and the Draft Feasibility Study Report, 7/12/89.

P. 350-350 Letter to Mr. Carlos R. Ramos, U.S. EPA, from Mr. Michael J. O'Toole, Jr., New York State Department of Environmental Conservation, re: Comments on the Draft Remedial Investigation and the Draft Feasibility Study Report, 7/14/89.

PUBLIC PARTICIPATION

Proposed Remedial Action Plans

P. 351-358 Report: Proposed Remedial Action Plan, prepared by U.S. EPA, 7/89.

APPENDIX D: NYSDEC LETTER OF CONCURRENCE

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

Thomas C. Jorling
Commissioner

SEP 22 1989

Mr. Stephen D. Luftig, P.E.
Director
Emergency & Remedial Response Division
U.S. Environmental Protection Agency
Region II
26 Federal Plaza
New York, NY 10278

Dear Mr. Luftig:

Re: Record of Decision (ROD)
Claremont Polychemical #130015

The New York State Department of Environmental Conservation (NYSDEC) has reviewed the draft Record of Decision for the referenced site. I am pleased to advise you that the NYSDEC concurs with the selected remedy.

Since the short schedule will not allow a review of the final ROD before the September 29, 1989 deadline, my acceptance of the remedy is based on our reading of the draft copy. In an effort to avoid a misunderstanding between our offices, the remedy that will appear in the final ROD should be as follows:

DESCRIPTION OF SELECTED REMEDY

This operable unit is one of two being conducted at the site. The first operable unit at this site involves overall site remediation, including soil and groundwater. This operable unit addresses the wastes held in containers (drums, bags, etc.), above-ground tanks, wastewater treatment basins, and a sump discovered at the site.

The major components of the selected remedy include:

- Compatibility testing of all wastes;
- Bulking and consolidation of compatible wastes;
- Transportation of wastes to an off-site treatment, storage and disposal (TSD) facility; and
- Treatment at TSD facility by incineration, solidification, landfill, etc.

Please contact Mr. Michael J. O'Toole, Jr., P.E., at (518) 457-5861 if you have any questions.

Sincerely,

Edward O. Sullivan

Edward O. Sullivan
Deputy Commissioner

cc: William McCabe, USEPA, Region II
Doug Garbarini, USEPA, Region II
Carlos Ramos, USEPA, Region II

APPENDIX E: RESPONSIVENESS SUMMARY

Claremont Polychemical Site
Old Bethpage, Nassau County
New York

The U.S. Environmental Protection Agency (EPA) held a public comment period from July 14, 1989 through August 14, 1989 to receive comments from interested parties on the final Remedial Investigation and Feasibility Study (RI/FS) reports and Proposed Plan for the Claremont Polychemical Superfund site.

A public participation meeting was conducted by EPA on August 1, 1989 at the Old Bethpage Village Restoration, Old Bethpage, New York to discuss the remedial alternatives, to present EPA's preferred alternative for the remediation of the site, and to provide an opportunity to the interested parties to present oral comments and questions to EPA.

This responsiveness summary provides a summary of citizen's comments and concerns about the site as raised during the public comment period, and the EPA's responses to those comments. All documents summarized in the document will be factored into EPA's final decision for selection of the remedial activities for cleanup of the Claremont Polychemical site.

This responsiveness summary is divided into the following sections:

I. Responsiveness Summary Overview. This section briefly describes the background of the Claremont Polychemical site and outlines the proposed alternatives.

II. Background on Community Involvement and Concerns. This section provides a brief history of community interests and concerns regarding the Claremont Polychemical site.

III. Summary of Major Questions and Comments Received During the Public Comment Period and EPA's Responses. This section summarizes comments submitted to EPA at the public meeting and during the comment period and provides EPA's response to these comments.

IV. Written Correspondence Received During the Public Comment Period and EPA's Responses. This section presents written comments received by EPA and provides EPA's responses to these issues.

I. RESPONSIVENESS SUMMARY OVERVIEW

Site Background

The Claremont Polychemical site is an abandoned production facility located in central Long Island, Village of Old Bethpage, Town of Oyster Bay, Nassau County, New York. The facility is

situated in an area comprised of light industrial, commercial and institutional properties (Oyster Bay Solid Waste Disposal Complex, SUNY Agricultural and Technical College at Farmingdale, and Bethpage State Park). The Suffolk County line is approximately 800 feet east of the site.

From 1968 until its closure in 1980, Claremont Polychemical was dedicated to the manufacture of inks and pigments for plastics, coated metallic flakes, and vinyl stabilizers. The principal wastes generated were organic solvents, resins and wash wastes (mineral spirits).

Concern for contamination was linked to a discovery in 1979 by the Nassau County Department of Health (NCDH) of 2,000 to 3,000 drums scattered about, some uncovered and others leaking. By September 1980 most of the drums were sorted and either removed from the site, or reused in the plant. Some of the material was burned in the plant's boiler. NCDH inspectors noted at the time that an area east of the building (spill area) was contaminated with organic solvents as a result of accidental and/or incidental spills and discharges. A subsequent removal action excavated the upper ten feet of a seventy-five foot by seventy-five foot area. The excavated material was placed on a plastic liner. Over the years, this liner has degraded and no longer forms an impermeable layer. Groundwater samples from a monitoring well installed at the time indicated the presence of groundwater contamination directly under the site.

Claremont Polychemical and its affiliated companies entered into receivership in 1980. In 1983, Woodward-Clyde Consultants, under the direction of the New York State Department of Environmental Conservation, conducted a preliminary investigation of the site. In 1984, Velzy Associates conducted a limited study of the site for the property owners. Additional work was performed by C.A. Rich Consultants in response to a request for information by the U.S. Bankruptcy Court. For the last four to five years two tenant businesses have been operating at the site under the supervision of the New York Bankruptcy Court.

EPA started work on the overall site remediation RI/FS on March 1988. On June 7, 1988 EPA conducted a site visit, and later completed an inventory of the approximately 700 drums and bags found on-site. The presence of five treatment basins and three aboveground tanks containing liquid and sludge was confirmed. The drums and bags hold numerous chemicals, including aluminum metal powder, flammable solvents, cadmium, zinc, antimony and lead based pigments, epoxy, acrylic and vinyl resins, organic based inks, and other unknown compounds. At the time many of the containers were open, leaking, or in poor condition.

As part of a removal action conducted in October 1988, EPA sampled the content of the treatment basins, aboveground tanks,

some of the drums, the floors, and the air inside the building. The liquid content of the treatment basins was removed, and the structures covered and snow-fenced. The drums and bags were classified in general categories based on their labels and information obtained from the owner of the company (i.e. organic, explosive, acid, etc.), staged, overpacked as necessary, and secured inside the building pending disposal.

A second operable unit RI/FS was started on March 1989 to deal with the wastes held in basins, aboveground tanks, containers and a sump. The results of this RI/FS indicates that the chemicals (drums, bags, tanks, etc.) are a combination of raw materials, finished products, and process wastes typical of this type of production facility. The chemical nature of the wastes varied from completely inorganic (e.g. lead, chromium and aluminum) to completely organic (e.g. phthalates and 2-butanone).

Summary of Remedial Alternatives

The remedial alternatives considered for the Claremont Polychemical site are described in the RI/FS and Proposed Plan for this operable unit (referred as operable unit two). Those alternatives considered are detailed below:

ALTERNATIVE 1 - NO ACTION

- No remedial measures would be implemented

ALTERNATIVE 2 - CONTAINMENT

- Compatibility testing of all wastes
- Bulking and consolidation of compatible wastes
- On-site storage

ALTERNATIVE 3 - OFF-SITE TREATMENT

- Compatibility testing of all wastes
- Bulking and consolidation of compatible wastes
- Transportation of wastes to an off-site treatment, storage and disposal (TSD) facility; and
- Treatment at TSD facility by incineration, solidification, landfill, etc.

EPA, in concurrence with New York State Department of Environmental Conservation, chose alternative 3: Off-site Treatment as the selected remedial action for the second operable unit at the Claremont Polychemical site. Based on the current information, this alternative provides the best protection of human health and the environment.

II. BACKGROUND OF COMMUNITY INVOLVEMENT

Community interest in the Claremont Polychemical site has been moderate throughout the RI/FS process and removal actions. Locally, the community has been active at public meetings related to various environmental problems associated with the Old Bethpage Landfill site and the Nassau County Fire Service Academy. Several remedial activities are currently being conducted at the landfill, including containment of groundwater contamination. The community has been aware of the Claremont Polychemical site through newspaper articles, fact sheets, press releases, public notices, and public information meetings. Because of the relatively close proximity of all the mentioned sites, the community has been vocal and has viewed all these sites as one comprehensive problem. Organized groups include: Citizens for Pure Water in South Farmingdale, South Farmingdale and Plainview Water Districts.

The major concerns and issues expressed by the community are:

- Health risks associated with the presence of the wastes contained in the aboveground tanks, basins, containers and a sump. Citizens expressed concern over possible threats to their health and safety due to the above mentioned wastes.

- Migration of contamination through groundwater. Local officials and public in general have focussed their concern on the potential for groundwater contamination and the impact on the drinking water supply wells located in the area.

III. SUMMARY OF MAJOR QUESTIONS AND COMMENTS RECEIVED DURING THE PUBLIC COMMENT PERIOD AND EPA'S RESPONSES

Comments raised during the public comment period are summarized below by topic of relevance. The public comment period was held from July 14, 1989 to August 14, 1989 to receive comments on EPA's final Remedial Investigation and Feasibility Study (RI/FS) and Proposed Plan reports for the Claremont Polychemical site.

Health and Safety

Comment: A citizen noted that for the last twenty years he has worked for a company located next to the Claremont Polychemical site. He wanted to know how dangerous the Claremont site is to the people working or living around this area.

EPA Response: Precautions will be taken during the implementation of the selected alternative. Access to the property will be restricted to authorized personnel only and all actions will be coordinated with local and state

agencies. By taking care first of the identified wastes (containers, etc.) EPA reduces the risk to human health and the environment due to releases of hazardous wastes. In addition, on October 1988, EPA conducted air monitoring in the property. The results indicate that the contaminants found in the air do not pose a significant threat to the health of workers on-site or in the vicinity of the site. A comprehensive risk assessment being conducted as part of the overall site remediation will address this issue in detail.

Groundwater Contamination

Comment: A local official asked how deep the groundwater contamination was.

EPA Response: EPA has taken samples from existing and newly installed monitoring wells on-site and off-site. The data is currently in the data validation stage and, therefore, not available at this moment. This information is not part of the operable unit discussed, however it will be part of the RI/FS for the overall site remediation.

Comment: A local official asked when the groundwater report would be issued and how he could obtain a copy of this information.

EPA Response: The RI and FS reports containing information related to overall site remediation, including nature and extent of soil and groundwater contamination, are scheduled to be available next spring. EPA will notify the community of the availability of this information through the issuance of press releases. In addition, all interested parties can request that EPA include them in the site mailing list.

Comment: A local official asked if EPA would consider treating any plume of groundwater associated with the Claremont Polychemical site.

EPA Response: This issue will be addressed in the near future once we get the RI/FS reports for the overall site remediation. However, if a plume is found EPA will evaluate all potential remedial actions needed including treating the water to drinking water standards.

Selected Remedy

Comment: A local town official concurred with EPA selected remedy for the treatment/disposal of the wastes held in the basins, aboveground tanks, containers and a sump.

EPA Response: Comment noted.

Comment: A local citizen group agreed with the selected remedy. They also recommended soil sampling at the site, and groundwater monitoring in and around the site.

EPA Response: EPA has completed extensive surface and subsurface soil sampling at the site. Also sampled were forty-one (41) new and existing monitoring wells on-site as well as off-site. This information will be available as part of the RI/FS for the overall site remediation.

Other Comments

Comment: A local resident asked why has taken EPA so long to address the pollution problems related the Claremont Polychemical site.

EPA Response: EPA involvement on the site started in 1984 when the site was originally proposed for the National Priority List, and subsequently accepted in June 1986. EPA got the site lead in 1986 and started the RI/FS in March 1988. It generally takes two (2) years to complete the RI/FS. This time is needed in order to complete a good characterization of the site. The implementation of the current remedy (treatment of wastes off-site) is being conducted in a shorter time frame and, therefore, will positively impact site remediation by reducing potential risks.

EPA Response: A resident inquired about a notice he received announcing the tax sale of the Claremont property. He wanted to know why the Nassau County didn't notify him that the property was contaminated.

EPA Response: EPA is unaware of any such notice and could not comment on this in particular. However, it should be noted that Claremont Polychemical and its affiliated companies are in bankruptcy court, and any transaction related to this property will be overseen by the bankruptcy court.

Comment: A resident asked how the work being conducted at the site will affect the current tenants.

EPA Response: To this moment EPA has been able to perform its studies without disrupting present tenants. Future status of tenants will depend on the activities to be conducted at the site.

IV. WRITTEN CORRESPONDENCE RECEIVED DURING THE PUBLIC COMMENT PERIOD AND EPA'S RESPONSES

South Farmingdale Water District

40 Langdon Road
Farmingdale, N.Y. 11735-3000

Telephone 516-249-3330

Fax 516-249-9053

Commissioners

Gerard F. McCormack
John H. Bates
Robert J. Steiner

Ronald Lindblad, Superintendent
Leonard Constantinopoli, Business Manager
Geraldine Balich, Office Manager

August 1, 1989

Carlos R. Ramos
Remedial Project Manager
U. S. Environmental Protection Agency
26 Federal Plaza - Room 747
New York, NY 10278

Re: CLAREMONT POLYCHEMICAL
SUPERFUND SITE

Dear Mr. Ramos:

The South Farmingdale Water District is a municipal Water District that provides a public water supply to 44,500 consumers from 11 deep magothy formation wells. We have expressed concern in the past about the CLAREMONT POLYCHEMICAL SUPERFUND SITE since our Water District with its deep wells are located to the south or generally down-gradient.

Plant 5 of the Water District -- which contains two deep wells (N7515 & N7516 are 347 & 584 feet deep respectively) are the closest to the Claremont Polychemical Superfund Site -- or about 11,500 feet to the south. With the slow horizontal movement of groundwater of about 1/2 foot per day -- it would take 62 years for a contaminated plume to reach our Plant 5. If we consider groundwater pollution starting when Claremont Polychemical commenced operations in 1969 -- this pollution might reach the District's Plant 5 by the year 2031. The saving grace for the South Farmingdale Water District is that the general flow of groundwater in that area is south-southeast which means that any plumes of contamination will probably miss the South Farmingdale Water District well sites.

However -- even if the South Farmingdale Water District is not impacted in the future by the Claremont Polychemical Superfund Site -- wells of water utilities to our north and east may be contaminated by this groundwater pollution. We understand that during its operation -- Claremont Chemicals utilized many underground tanks including a 6,000 gallon steel tank of toluene plus a 6,000 gallon steel tank of MEK as part of their ink process.

CLR 001 1978

We understand that the Nassau County Health Department discovered and had between 2,000-3,000 drums removed from this Claremont Chemical site between May and September 1980. A further June 1988 site inspection by E.P.A. uncovered an additional 470 drums plus containers of pigments and solvents -- plus 230 bags of dry chemicals -- plus 3 above ground tanks -- plus a 5 section wastewater treatment basin. With chemicals such as 71% weight/weight of 4-methyl 2-pentanone -- WE AGREE that they should all be removed from this Superfund Site.

With the "sole source" aquifer on Long Island -- and the need to protect our groundwater for future generations -- WE SUPPORT ALTERNATIVE 3 -- OFF-SITE TREATMENT -- to commence immediately on the proposed six month time frame to completion.

PLEASE ADVISE US of your decision -- and when the work is completed.

THANK YOU.

Very truly yours,

BOARD OF WATER COMMISSIONERS
SOUTH FARMINGDALE WATER DISTRICT

Commissioner Gerard F. McCormack
Chairman

GFM:es

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II
JACOB K. JAVITS FEDERAL BUILDING
NEW YORK, NEW YORK 10278

AUG 2 9 1989

Gerald F. McCormack
Chairman
Board of Commissioners
South Farmingdale Water District
40 Langdon Road
Farmingdale, NY 11735-3000

Re: Claremont Polychemical Site Remedial Investigation and Feasibility Study, Second Operable Unit

Dear Mr. McCormack:

Thank you for your letter of August 1, 1989 regarding the Remedial Investigation/Feasibility Study (RI/FS) for the second operable unit performed at the Claremont Polychemical site. Your comments have been incorporated in the Responsiveness Summary prepared by EPA to document comments raised by the community during the public comment period.

If you have additional questions or comments, please feel free to contact me at (212) 264-5636.

Sincerely,

Carlos R. Ramos
Remedial Project Manager
Eastern New York/Caribbean
Remedial Action Section

CLR 001 1980

RE:CLAREMONT POLYCHEMICAL SITE

August 11,1979

Mr. Carlos R. Ramos, Remedial Project Manager
U.S. Environmental Protection Agency
26 Federal Plaza, Room 747
New York, N.Y. 10278

Dear Sir;

My comments shall be in an entirely different vein than the one requested. But in a way I believe it is more important to find out how this site was allowed to get into this condition and finally wind up on a national priorities list of hazardous waste sites. Maybe then, we could see where the system isn't working and what needs to be addressed. I would like to know which agency or agencies should be held accountable for permitting this company to operate insuch an irresponsible manner. There seems to be a pattern in Nassau County where companies are allowed to operate with little or no supervision and their crimes are not discovered for many years. Then it seems to take many more years before a cleanup is started.

In November 1975 or was it 1979, we are given both dates Nassau County Health Department discovered 2,000/3,000 drums scattered bout, some uncovered and others leaking or lying on their sides. How many site inspections did the N.C.D.H. make between 1968 and 1975 or 1979? This mess at this site wasn't accomplished overnight. Why didn't the health dep't discover this contamination a lot sooner and indoing so prevent it from getting to this magnitude?

This company went out of business in 1980. Why did it take E.P.A. 8 years to investigate this site? Has no one inspected the liner which held the excavated, contaminated soil for the last 8 or 9 years? When was the groundwater contamination under the liner site discovered?

What are the steps taken before a site finds itself on a superfund priority list? Are the accountable roles clearly defined for those agencies that are supposed to be protecting the peoples' health?

If you cannot answer some of the questions I have raised, perhaps you can advise me who can.

I respectfully request that this inquiry also be made part of the record and the answers to those questions I raised also be made part of that same record.

Hoping to receive a prompt reply, I am,

Sincerely,

Betty Seiden

Betty Seiden
216 Sullivan Ave.
Farmingdale, N.Y. 11735

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II
JACOB K. JAVITS FEDERAL BUILDING
NEW YORK, NEW YORK 10278

AUG 2 9 1989

Betty Seiden
218 Sullivan Avenue
Farmingdale, New York 11735

Re: Claremont Polychemical Site Remedial Investigation and Feasibility Study, Second Operable Unit

Dear Ms. Seiden:

Thank you for your letter of August 11, 1989 regarding the Remedial Investigation/Feasibility Study (RI/FS) for the second operable unit performed at the Claremont Polychemical site. Your comments have been incorporated in the Responsiveness Summary prepared by EPA to document comments raised by the public during the comment period.

As requested, summarized below are EPA's response to your comments.

Comment 1. Origin of contamination at the site
According to the information provided to EPA by the Nassau County Department of Health (NCDH), the presence at the site of 2,000-3,000 drums was discovered during an inspection conducted by NCDH officials in November 1979. A typographical error is responsible for the inconsistency of dates you found between the executive summary and the text of the RI/FS reports. We are sending an errata sheet to the document repository (Old Bethpage-Plainview Library) to be attached to these documents. Other questions related to actions taken by NCDH during the operation of the facility should be addressed to Mr. Joseph Schechter of the Nassau County Department of Health at (516) 535-2406.

Comment 2. Chronology of events at the site
The Claremont Polychemical Corporation entered into bankruptcy proceedings in 1980. From 1980 to 1986 the State of New York attempted to negotiate an agreement with the site owners to fund the RI/FS. The State of New York transferred the lead on the site to EPA in 1986, and funds for the RI/FS were allocated in 1988. This RI/FS is currently in progress and deals with overall site remediation, including soil and groundwater. A second RI/FS (OU-II) was completed in July 1989 to deal with wastes held in containers, basins, aboveground tanks, and a sump. The selected remedial action for handling the wastes identified in OU-II is off-site treatment.

Comment 3. Condition of liner used to place excavated soils, and first indication of groundwater contamination

In 1980 and under the supervision of NCDH, Claremont Polychemical Corporation excavated the upper ten feet of a seventy-five foot by seventy-five foot area. The excavated material was placed on polyethylene liners. According to a C.A. Rich report prepared in 1986, (Hydrogeologic Investigation of the Former Claremont Polychemical Facility, Old Bethpage, New York), the liners lost their impermeability due to degradation. It should be noted that the long term effectiveness of the synthetic liners is very limited due to natural factors (e.g. weathering, microbial activity, ruptures, etc.) and interactions with contaminants in the soil. A limited number of groundwater samples collected in 1980 were the first to suggest the presence of groundwater contamination directly below the spill area.

Comment 4. Process to get a site on the National Priority List

Remedial response is a long and complicated process. After learning of a site, EPA's first step is to review all available information about the site. This process is called a preliminary assessment, and if this study indicates that there may be a hazardous waste problem that may pose a risk to human health and the environment, EPA orders a site inspection. These inspections include visiting the site, sampling, and documenting the site layout and terrain. This information is used to rank the risks associated with a site. Sites that exhibit risks which are significant enough to warrant further investigation are proposed to the National Priority List (NPL). After a public comment period, sites that meet established criteria will be placed on the final NPL.

Once again, thank you for your comments. If you have additional questions or comments, please feel free to contact me at (212) 264-5636.

Sincerely,

Carlos R. Ramos
Remedial Project Manager
Eastern New York/Caribbean
Remedial Action Section

BOARD OF COMMISSIONERS
PLAINVIEW WATER DISTRICT
10 MANETTO HILL ROAD
PLAINVIEW, N. Y.

WELLS 1-6468

August 23, 1989

Mr. Carlos R. Ramos
Remedial Project Manager
U.S. Environmental Protection Agency
26 Federal Plaza, Room 747
New York, N.Y. 10278

Re: Claremont Polychemical Superfund Site

Dear Mr. Ramos:

The Plainview Water District would like to comment on the Claremont Polychemical Superfund Site.

Considering the general flow of ground water in the area, the Plainview Water District wells would most likely not be susceptible to the Polychemical pollution plume. However, the Plainview Water District has a history of being actively involved in fighting pollution. As we are sure the E.P.A. is aware, our status as a groundwater sole source aquifer makes us unique- we live on the water we drink. As a supplier of potable water to the residents of our district, it would be irresponsible for us to disregard this pollution problem. We are strongly recommending ALTERNATIVE 3: OFF-SITE TREATMENT, which should begin as soon as possible. Considering the magnitude of the problem at Polychemical, this is the only alternative we can endorse.

We would like to bring to your attention one final thought regarding the hearing notice. The Plainview Water District was never notified about the scheduled hearing. As an interested party in close proximity to the site, we find this to be unacceptable and would request that the EPA notify all water districts in the affected and surrounding area well before when hearings such as this are scheduled and provide necessary documentation in advance.

Sincerely,

BOARD OF COMMISSIONERS
PLAINVIEW WATER DISTRICT

Donald A. Rosen

Donald A. Rosen, Chairman
Bernard Chetkof, Treasurer
John C. Edwards, Secretary

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II
JACOB K. JAVITS FEDERAL BUILDING
NEW YORK, NEW YORK 10278

AUG 2 9 1989

Donald A. Rosen
Chairman
Board of Commissioners
Plainview Water District
10 Maneto Hill Road
Plainview, NY 11803

Re: Claremont Polychemical Site Remedial Investigation and Feasibility Study, Second Operable Unit

Dear Mr. Rosed:

Thank you for your letter of August 11, 1989 regarding the Remedial Investigation/Feasibility Study (RI/FS) for the second operable unit performed at the Claremont Polychemical site. Your comments have been incorporated in the Responsiveness Summary prepared by EPA to document comments raised by the community during the public comment period.

A Community Relations Plan (CRP) was prepared for the Claremont Polychemical site in order to provide the community with timely information concerning developments at the site. As part of the CRP, EPA has issued fact sheets and press releases. In addition EPA published public notices in local newspapers informing and inviting the public to provide input on Superfund actions at the site. A mailing list was also developed based on input from local citizen groups, government officials, and direct requests from individual or interested parties. In the past, announcements regarding the Claremont Polychemical site have been mailed to Mr. Bernard Chetkof, treasurer, Plainview Water District. We will also add your name to our mailing list.

Once again, thank you for your comments. If you have additional questions or comments, please feel free to contact me at (212) 264-5636.

Sincerely,

Carlos R. Ramos
Remedial Project Manager
Eastern New York/Caribbean
Remedial Action Section

CLR 001 1985