GOODMAN BROTHERS STEEL DRUM (DAR SITE ID #122)

Address:	18 Division Place, Brooklyn, New York 11222
Tax Lot Parcel(s):	Brooklyn Block 2849, Lot 10
Latitude:	40.720112
Longitude:	-73.940038
Regulatory Programs/ Numbers/Codes:	AFS No. 3604700173, USEPA ID No. NYD047683776, IWD No. 95-P752-1, NYSDEC Spill Nos. 0109316, 0109317, and 9103684, CBS No. 2-000008, PBS No. 2-017620
Analytical Data Status:	☐ Electronic Data Available ☐ Hardcopies only ☒ No Data Available

1 SUMMARY OF CONSTITUENTS OF POTENTIAL CONCERN (COPCs) TRANSPORT PATHWAYS TO THE CREEK

The current understanding of the transport mechanisms of COPCs from the upland portions of the Goodman Brothers Steel Drum Co. (Goodman) site (site) to Newtown Creek is summarized in this section and Table 1, and supported in following sections.

Overland Transport

The site is located approximately 0.5 mile from Newtown Creek and associated waterways. This is not a complete current or historical pathway.

Bank Erosion

The site is not adjacent to Newtown Creek and associated waterways. This is not a complete current or historical pathway.

Groundwater

Information regarding on-site groundwater investigations was not identified in documents available for review. There is insufficient evidence to make a current or historical pathway determination.

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Overwater Activities

The site is not adjacent to Newtown Creek and associated waterways. Information regarding overwater activities was not identified in documents available for review. This is not a complete current or historical pathway.

Stormwater/Wastewater Systems

Industrial Wastewater Discharge (IWD) Permit Number 95-P752-1 (NYCDEP 1990) was issued to the site. The site was in violation of the permit in 1992 and 1994 for not providing adequate pretreatment for petroleum hydrocarbons before discharging wastewaters (NYCDEP 1992, 1994). The site was also in violation of the permit in 1992 for not providing adequate pretreatment for biological oxygen demand, and in 2005 for wastewaters with "pH exceedances" (Grande 1992; NYCDEP1995). The site is within the Newtown Creek Water Pollution Control Plant (WPCP) sewershed. Stormwater and wastewater discharges from the site flow into a combined municipal sewer system. When the combined flows in the sewer exceed the system's capacity, untreated combined sewer overflows (CSOs) are discharged to the East River (NYCDEP 2007). Discharge to sewer/CSO and direct discharge of stormwater and wastewater are not complete current or historical pathways.

Air Releases

The site has a facility wide air permit (USEPA 2011). No further information regarding air emissions from the site was identified in documents available for review. There is insufficient evidence to make a current or historical pathway determination.

2 PROJECT STATUS

Information regarding on-site environmental investigations was not identified in documents available for review. A New York State Department of Environmental Conservation (NYSDEC) Site Code was not found for this site (NYSDEC 2011a).

3 SITE OWNERSHIP HISTORY

Respondent Member: ☐ Yes ☒ No

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Owner	Years	Occupant	Types of Operations
Fannie, Morris, and Bessie Goodman / doing business as Goodman Bros. Steel Drum as of 1959	1911 – 1967	Goodman Bros. Steel Drum. Circa 1911-2002	Steel drum reconditioning
B&F Goodman Associates, Inc.	1967 – 2004		
Richland Properties, Inc./King Tower Properties, Inc.	2004 – present	M & A Projects, Inc.	Construction sand and gravel

Note:
Additional discussion and sources provided in Section 6.

4 PROPERTY DESCRIPTION

The site occupies approximately 0.68 acres located 0.5 mile from Newtown Creek and associated waterways. The site is approximately 35 feet above mean sea level. There is a gradual regional slope down to the west as shown on Figure 1. The site and nearby properties are zoned for manufacturing (NYCDCP 2012).

5 CURRENT SITE USE

In 2005, M & A Projects Inc. started operating at the 18 Division Place address. The company's operations are described as providing construction sand and gravel (Manta 2011).

6 SITE USE HISTORY

Goodman was a family owned business founded in 1911. An unnamed entity, probably Goodman, stored barrels at the site as early as 1933 (Sanborn 1915; B&F Goodman Associates 1967). Goodman expanded operations by acquiring adjacent lots in 1972, stretching their property southward to Richardson Street (Goodman Bros. Steel Drum Co. 1972). Operations included storage and a cooperage as of the 1980s (Sanborn 1933).

Goodman closed their doors in 2002, stating that the company could not then compete with similar steel drum refurbishing facilities in New Jersey (Kruzynski 2002). Goodman sold the lots in 2004 (B&F Goodman Associates 2004a, 2004b, 2004c). In 2005, M & A Projects Inc. started operating at the 18 Division Place address.

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7 CURRENT AND HISTORICAL AREAS OF CONCERN AND COPCs

The current understanding of the historical and current potential upland and overwater areas of concern at the site is summarized in Table 1. The following sections provide brief discussion of the potential sources and COPCs at the site requiring additional discussion.

Areas of concern at the site include areas in which drum refurbishing occurred, as well as chemical and petroleum storage areas. COPCs associated with these areas include total petroleum hydrocarbons (TPH) and associated polycyclic aromatic hydrocarbons (PAHs) and volatile organic compounds (VOCs) from the petroleum underground storage tanks (USTs); and PAHs, VOCs, metals, other semi-volatile organic compounds (SVOCs), and potentially pesticides, herbicides, and polychlorinated biphenyls (PCBs) from the residues within recycled drums. Additionally, the chemicals such as muriatic acid, sodium hydroxide, sodium metasilicate pentaphosphate, soda ash, and sodium nitrite used for cleaning drums are COPCs.

7.1 Uplands

Goodman refurbished and stored used steel drums. Three galvanized steel USTs are on the property under Petroleum Bulk Storage (PBS) No. 2-017620. One is a closed in-place 500-gallon No. 2 fuel oil tank. The other two USTs are 1,100-gallon No. 2 fuel oil tanks. Neither the tanks nor associated piping have spill prevention, tank leak detection, or have overfill monitoring (EDR 2010). Two other above ground storage tanks are at the site under Chemical Bulk Storage (CBS) 2-000008. These tanks, a 3,000-gallon and 5,000-gallon tank, were used for the storage of hydrochloric acid. The 3,000-gallon tank has electronic leak detection and the 5,000-gallon has a catch basin for overfill. The following table summarizes the tanks found on site:

Tank ID	Date Installed	Tank Status	Tank Location	Capacity (gallons)	Product
CBS 2-000008					
00001	02/00	In service	AST	3,000	Hydrochloric acid
00001-A	NR	In service	AST	5,000	Hydrochloric acid

Tank ID	Date Installed	Tank Status	Tank Location	Capacity (gallons)	Product
PBS 2-017620					
001	01/01/97	Closed in place 01/01/97	UST	500	No. 2 fuel oil
002	NR	In service	UST	1,100	No. 2 fuel oil
003	NR	In service	UST	1,100	No. 2 fuel oil

Notes:
AST – aboveground storage tank
CBS – chemical bulk storage
NR – not reported
PBS – petroleum bulk storage
UST – underground storage tank

Goodman used muriatic acid, sodium hydroxide, sodium metasilicate pentaphosphate, soda ash, and sodium nitrite to clean drums (Nanco Labs, Inc. 1982). Drums underwent several scour and rinse sessions to remove any residue from previous use. After cleaning and drying, drums were sanded and prepared for painting (Nanco Labs, Inc. 1984). In the 1980s, the facility reconditioned about eight hundred 55-gallon steel drums a day with roughly 20,000 pounds of sludge generated at the facility each year. The drums that were recycled came from various sources.

The site was classified as a Resource Conservation and Recovery Act (RCRA) large quantity generator from 1980 to 2002 (EDR 2010), and then a small quantity generator in 2006 (EDR 2010). The RCRA hazardous wastes generated at the site in 1992 and 1994 included toxic characteristic wastes for cadmium (D006) and chromium (D007) (NJSDEP 1992; Laidlaw 1994). There were cases between 1982 and 2002 where the site was not in compliance under RCRA or violated regulations (EDR 2010). The first case of non-compliance was storing hazardous wastes on site without a permit (USEPA 1982). In 1982 and 1987, the violations were classified as a "general generators violation," with no specific violation cited (EDR 2010). The site was later found to be in compliance for the 1982 and 1987 violations (EDR 2010). In 1999, the violation was again called a general generators violation, with a specific violation of regulation SR-372 (EDR 2010). The site was later deemed in compliance. The last time the site violated regulations was in 2002, cited in violation of regulations SR 372.2a and b; SR 373-1.1d and e; and SR 373-3.3b and g. The site was in compliance for these violations in 2005 (EDR 2010).

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7.2 Overwater Activities

The site is not adjacent to Newtown Creek and associated waterways. Information regarding overwater activities was not identified in documents available for review.

7.3 Spills

There were two documented spills for this site. Documented spills at this site are summarized as follows:

- On June 28, 1991, the release of 100 gallons of unknown material from an unknown source affected soil (NYSDEC Spill No. 9103684). The spill was closed on July 3, 1991 (NYSDEC 2011b).
- On December 20, 2001, the release of approximately 2 to 3 gallons of motor oil from the routine maintenance of a compressor was reported to NYSDEC (Spill No. 0109316). The case was closed on July 7, 2003 (EDR 2010; NYSDEC 2011b).
- Also on December 20, 2001, the release of 1 quart of wastewater as a result of a pump maintenance was reported to NYSDEC (Spill No. 0109317). The NYSDEC individual who responded to the spill reported wastewater leaked during pump maintenance and was cleaned up. The case was closed on February 13, 2003 (EDR 2010; NYSDEC 2011b).

8 PHYSICAL SITE SETTING

No site specific geologic or hydrogeologic information is available for the site. The following information is based on regional conditions in the Brooklyn/Queens area.

In general, the geologic setting of Newtown Creek area consists of Quaternary glacial deposits overlying Paleozoic gneiss and schist bedrock (Misut and Monti 1999). The contact between the glacial deposits and bedrock slopes rather steeply to the southeast, ranging in depth from less than 50 feet below ground surface (bgs) near the mouth of Newtown Creek to over 200 feet bgs at the eastern portions of the historical data review area. The near surface geology is of most interest relative to potential groundwater transport pathways from upland sites to the creek. In most areas, a heterogeneous anthropogenic fill unit of variable thickness (generally less than 20 feet thick) immediately underlies the surface. Beneath the

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fill in most areas are complex upper glacial deposits of Late Pleistocene age consisting of ablation till, outwash, and glaciolacustrine sediments. In some areas near Newtown Creek, a shell-bearing gray silt unit is present beneath the fill; this silt may represent post-glacial intertidal sediments deposited in wetlands adjacent to the creek prior to filling in the 1800s. An extensive sequence of regionally significant glacial units underlies the upper glacial deposits in areas where bedrock is deeper (Misut and Monti 1999).

The surface aquifer is typically contained with the upper glacial deposits and the lower portion of the anthropogenic fill layer. Depth to groundwater varies from a few feet to about 30 feet bgs in the historical data review area. Shallow groundwater generally flows towards and discharges to Newtown Creek (Misut and Monti 1999).

9 NATURE AND EXTENT (CURRENT UNDERSTANDING OF ENVIRONMENTAL CONDITIONS)

9.1 Soil

Soil Investigations		☐ Yes	☒ No
Bank Samples	☐ Yes	☐ No	☒ Not Applicable
Soil-Vapor Investigations		☐ Yes	☒ No

Information regarding on-site soil investigations was not identified in documents available for review.

9.2 Groundwater

Groundwater Investigations		☐ Yes	☒ No
NAPL Presence (Historical and Current)		☐ Yes	☒ No
Dissolved COPC Plumes		☐ Yes	☒ No
Visual Seep Sample Data	☐ Yes	☐ No	☒ Not Applicable

Information regarding on-site groundwater investigations was not identified in documents available for review.

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9.3 Surface Water

Surface Water Investigation	☐ Yes	☒ No
SPDES Permit (Current or Past)	☐ Yes	☒ No
Industrial Wastewater Discharge Permit (Current or Past)	☒ Yes	☐ No
Stormwater Data	☐ Yes	☒ No
Catch Basin Solids Data	☐ Yes	☒ No
Wastewater Data	☐ Yes	☒ No

9.3.1 Stormwater and Wastewater Systems

This site is located within the Newtown Creek WPCP sewershed (NYCDEP 1998). Stormwater and wastewater discharges from the site flow into a combined municipal sewer system. When the combined flow exceeds the system's capacity, untreated CSOs are discharged to the East River, which is outside of the Newtown Creek study area (NYCDEP 2007).

Two different systems were used over time to treat wastewaters generated at the site. Initially, a two stage separatory tank was used (Nanco Labs, Inc. 1982) and later a self contained treatment system was used (Dynatec 1990). With the separation approach, wastewater from the weekly dumps of caustic tanks, and other miscellaneous storage drums/pits throughout the site, was collected and allowed to settle in two 3,000 gallon storage tanks in order to complete gravity separation of solids and free floating materials. The sludge and oil separated from the wastewater was stored separately in holding tanks and then solidified and transferred to a secure landfill (Nanco Labs, Inc. 1982). Some waste did reach the sewer system before the treatment system was in place sometime in 1991 (NYCDEP 1991).

In 1991, a treatment system was used on site to capture waste and chemicals used to clean the barrels (Goodman Bros. Steel Drum Co. 1991). The self-contained system recycled the liquid and captured the sludge for collection (Goodman Bros. Steel Drum Co. 1991). Pretreated liquid from the treatment system was discharged to the sewer, as permitted under the IWD permit (NYCDEP 1993) discussed below in Section 9.3.2.

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9.3.2 Industrial Wastewater Discharge Permit

At least one IWD permit, permit number 95-P752-1 (NYCDEP 1990) existed for the site. The site was in violation of the permit in 1992 and 1994 for not providing adequate pretreatment for petroleum hydrocarbons before discharging wastewaters (NYCDEP 1992, 1994). The site was also in violation of its permit in 1992 for not providing adequate pretreatment for biological oxygen demand and in 2005 for wastewaters with "pH exceedances" (Grande 1992; NYCDEP 1995).

The volume of wastewater that went to the sewer varied over time. For example, in 1991, NYCDEP estimated that the site discharged 16,000 gallons per day (gpd) to the sewer, and in 1996 the estimate was 8,846 gpd (NYCDEP 1991, 1997). By 1998, NYCDEP stated the site had no discharge to the sewer, and it was classified as a non-significant industrial user by 2000 (NYCDEP 1998, 2000).

9.4 Sediment

Creek Sediment Data ☐ Yes ☐ No ☒ Not Applicable

Information regarding sediment investigations was not identified in documents available for review.

9.5 Air

Air Permit ☒ Yes ☐ No

Air Data ☐ Yes ☒ No

9.5.1 Air Permit

The site had on file a facility wide air permit (AFS No. 3604700173). The emissions are classified as potential uncontrolled emissions (USEPA 2011). The previously active operations at the site that required air permitting had the following air permit requirements.

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Permit Type	Permit Number	Effective Date	Frequency-Parameters
General Facility Permit	3604700173	Unknown	Volatile organic compounds, 8-hour moderate
			Total hazardous air pollutants, no frequency specified
			Total particulate matter, no frequency specified
			Sulfur dioxide, no frequency specified
			Nitrogen dioxide, no frequency specified

Available documents contained no data related to air discharges or air emissions for this site (USEPA 2011). There were no air emissions violations noted for this site (USEPA 2011).

10 REMEDIATION HISTORY (INTERIM REMEDIAL MEASURES AND OTHER CLEANUPS)

Information regarding on-site environmental investigations was not identified in documents available for review.

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12 ATTACHMENTS

Figures

Figure 1 Site Vicinity Map: Goodman Brothers Steel Drum

Tables

Table 1 Potential Areas of Concern and Transport Pathways Assessment

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Table 1

Potential Areas of Concern and Transport Pathways Assessment – Goodman Brothers Steel Drum

Potential Areas of Concern	Media Impacted					COPCs														Potential Complete Pathway						
						TPH			VOCs																	
Description of Areas of Concern	Surface Soil	Subsurface Soil	Groundwater	Catch Basin Solids	Creek Sediment	Gasoline-Range	Diesel – Range	Heavier – Range	Petroleum Related (e.g., BTEX)	VOCs	Chlorinated VOCs	SVOCs	PAHs	Phthalates	Phenolics	Metals	PCBs	Herbicides and Pesticides	Dioxins/Furans	Overland Transport	Groundwater	Direct Discharge – Overwater	Direct Discharge – Storm/Wastewater	Discharge to Sewer/CSO	Bank Erosion	Air Releases
Spills	?	?	?	?	?	?	√	?	?	?	?	?	?	?	?	?	?	?	?	--	?	--	--	--	--	?
Drum Wash Water	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	--	?	--	--	--	--	?
Hydrochloric acid ASTs	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	--	?	--	--	--	--	?
Petroleum USTs	?	?	?	?	?	?	√	?	?	?	?	?	?	?	?	?	?	?	?	--	?	--	--	--	--	?

Notes:
√ – COPCs are/were present in areas of concern having a current or historical pathway that is determined to be complete or potentially complete.
? – There is not enough information to determine if COPC is/was present in area of concern or if pathway is complete.
-- – Current or historical pathway has been investigated and shown to be not present or incomplete.

AST – aboveground storage tank
BTEX – benzene, toluene, ethylbenzene, and xylenes
COPC – constituents of potential concern
CSO – combined sewer overflows
PAHs – polycyclic aromatic hydrocarbons
PCB – polychlorinated biphenyl
SVOC – semi-volatile organic compounds
TPH – total petroleum hydrocarbons
UST – underground storage tank
VOC – volatile organic compounds

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USEPA Sample Locations (Surface and Subsurface)
Shoreline (NYC Dept. of Information Technology, 2006)
USGS Nat'l Elev. Dataset 5-foot Contours
Selected Site Property Boundary
Neighboring Site Property Boundary

Outfall Class
- Direct Discharge
- General
- Highway Drain
- Major Stormwater Outfall
- SPDES
- Storm Drain

NOTES:
1. Outfall Labeling: BB: Bowery Bay; NC(B/Q): Newtown Creek, Brooklyn/Queens; ST: Stormwater.
2. Outfall locations are preliminary, compiled, estimated data based on New York City Department of Environmental Protection (NYCDEP) maps and tabulated data and other resources. Many outfall locations were taken from the New York City Shoreline Survey Program: Newtown Creek Water Pollution Control Plant Drainage Area, NYCDEP, March 31, 2003. Other locations were taken from an excerpt from a similar report from 2008 (the complete report was not included in files available for review). Finally, some outfall locations were inherited from previous Anchor QEA and Newtown Creek Project work. Latitudinal and longitudinal data provided in the 2003 and 2008 NYCDEP reports were rounded to the nearest second. This resulted in potential outfall location discrepancies of up to approximately 200 feet. All outfall locations are currently under field verification.
3. Aerial Photos: New York State Division of Homeland Security and Emergency Services, 2010.
4. Site Boundaries are based on New York City parcels data.
5. Coarse topographic contours are derived from U.S. Geological Survey 10-meter data.

Feet
0 100 200 300 400

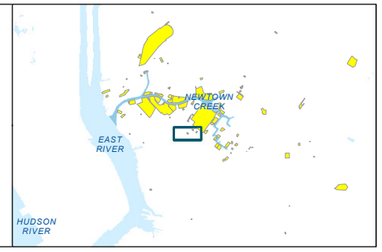

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Figure 1
Site Vicinity Map
Draft Upland Site Summary: Goodman Brothers Steel Drum
Newtown Creek RI/FS