LOWER LEY CREEK SUBSITE OF ONONDAGA LAKE SUPERFUND SITE, ONONDAGA COUNTY, NEW YORK

EPA's REQUEST FOR INFORMATION RESPONSE

Prepared for:

SYRACUSE CITY SCHOOL DISTRICT
Facilities Management Department
725 Harrison Street
Syracuse, New York 13210
Attn: Tom Ferrara, P.E.

For submission to:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY (USEPA) REGION 2
Emergency and Remedial Response Division
New York Remediation Branch
290 Broadway, 20th Floor
New York, New York 10007
Attn: Ms. Pam Tames

Prepared by:

TDK Engineering Associates, PC
19 Genesee Street
Camillus, New York 13031
PH: (315) 672-8726

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TDK Engineering Associates, PC

INTRODUCTION

On behalf of the Syracuse City School District (SCSD), TDK Engineering Associates (TDK) has summarized the attached information in response to the Environmental Protection Agency's (EPA's) May 6, 2014 Request for Information (RFI).

Of the properties that the SCSD currently or formerly owned within ½-mile of Ley Creek or its tributaries, the following three sites were identified within the EPA's Resource Conservation and Recovery Act (RCRA) database.

- ***SCSD Transportation Center***, currently owned by SCSD.
- ***Salina School Apartments***, formerly owned by SCSD; transferred to City of Syracuse Department of Community Development, who transferred the property to a private developer for conversion into senior apartments.
- ***Former Eastwood School***, formerly owned by SCSD; transferred to City of Syracuse Department of Community Development, who transferred the property to a private developer for conversion into senior apartments.

The locations of the three sites relative to Ley Creek and its tributaries are provided on the attached *Regional Location Plan* [*Figure 1*, Appendix 1].

FINDINGS

The following responses are based on information provided by the SCSD, supplemented by TDK's review of EPA and New York State Department of Environmental Conservation (DEC) databases and a Freedom of Information Law (FOIL) request made to the regional DEC office.

Transportation Center

Specific responses to Item No.'s 1 through 14 of the EPA's RFI, pursuant to CERCLA 42 USC 9604(e) concerning the *Lower Ley Creek Subsite* of the *Onondaga Lake Superfund Site* are provided herein. Supporting information is provided in the attached Appendices.

1. *List all properties that the City current owns or operates or previously owned or operated within one-half mile of the shoreline of Ley Creek or one of its tributaries and all other properties that may directly or indirectly impact or may have impacted Ley Creek. For each property, provide the following information:*

    a. *State the address and identify the dates of the City's ownership and/or operation and provide copies of all documents concerning this interest (e.g. deeds, leases, foreclosure records).*

- Address: 369-79 6th North Street, Syracuse, NY 13208
- Date of Ownership/Operation: The Syracuse City School District (SCSD) constructed the current transportation center building in 1994. No copies of deeds were available, and the exact date of transfer of ownership to SCSD was not provided.

b. *Provide a detailed description of the operations, processes, and business activities the City conducted at each property. If the operations changed over time, indicate the nature of the changes and the dates the changes took place.*

The SCSD operates the facility as a vehicle maintenance garage. Site activities consist of routine maintenance and servicing of district vehicles. The district's food service and transportation departments are also housed at this facility.

c. *If the City leased any portion of a property to another entity, please identify the entity, the nature of its operations, and provide copies of any leases.*

The SCSD has not leased any portion of the property to another entity.

d. *Provide copies of any maps, property plans, or floor plans for each property. The floor plan should depict all drainage sumps, above-ground and below-ground discharge piping, and above-ground and underground storage tanks.*

Attached are the following:

- *Grading Plan* [*Figure 1*, Appendix 2], which was prepared by TDK in connection with a parking lot re-grading program conducted in 2012.
- Excerpts from transportation center floor and site plans [*Figures 2* and *3*, Appendix 2], which indicate the building floor drains to be directed to an oil-water separator (OWS) and reportedly, the municipal sewer. The OWS system initially included a 1,000-gallon holding tank, which was subsequently replaced with a 500 gallon tank.

e. *Provide any historic photographs including aerial photographs and photographs showing construction, industrial or commercial processes, outfalls, and indoor and outdoor storage of materials or products at each property.*

Attached are historic topographic maps [Appendix 3] and Sanborn fire insurance maps [Appendix 4], which indicate occupancy of the property by a truck repair facility from the early 1950's until the late 1980's (reportedly prior to ownership by SCSD).

f. *Provide copies of all reports, information, or data you have related to the geology, soil, water (ground, surface, and storm water), and air quality at each property.*

Attached are copies of the following:

- Laboratory report for analysis of stockpiled soil at the transportation center property [Appendix 5]. The soil was subsequently incorporated into the (2012) site re-grading and parking lot expansion program. Refer to Item No. 1-g for additional information.

- Soil boring logs for a geotechnical investigation conducted at the site in 1992, in connection with the transportation center construction program [Appendix 6].

g. *Describe any grading, fill, excavation, and dredging activities performed by the City or by another entity with the City's approval at each property.*

An approximately 0.9-acre area of the site was re-graded in the Spring of 2012, in order to expand the facility's parking lot to the west. Suspected contaminated soil which had previously been stockpiled on-site was incorporated into the grading program. The grading plan was prepared by TDK [*Figure 1*, Appendix 2] and DEC notification was coordinated by SCSD.

h. *If applicable, describe the closure of any facility located at each property. Your answer should include, but not be limited to, when the closure of the facility occurred, how waste material was disposed, and whether any waste material was left onsite.*

The former truck servicing facility was demolished in the early to mid 1990's, in order to facilitate the site's conversion to the SCSD transportation center. The former building's location relative to the current SCSD transportation center building is shown in *Figure 4*, Appendix 2. The former truck repair building is also shown on the historic topographic and Sanborn maps [Appendices 3 and 4, respectively]. No information concerning disposal of waste materials was available.

2. *List all hazardous substances and industrial wastes that are or were used, stored, generated, handled, or received on each property identified in your response to question 1. Be as specific as possible in identifying each chemical or waste stream, and provide, among other things, the chemical name, brand name, chemical content, and the process in which it was used at each property. State the period when each hazardous substance and industrial waste was used, stored, generated, handled, or received at each property, and provide the volume or weight of each hazardous substance and industrial waste that was used. Provide copies of any supporting documentation, including but not limited to invoices, manifests, hazardous substances, hazardous and industrial waste data and analyses or characterizations, contracts, and agreements with transporting, treatment, storage, or disposal facilities. Please also provide the following, as applicable:*

Based on records obtained from an environmental vendor (*Environmental Data Resources – EDR*), the site was issued EPA identification (ID) number NYR000143164 in 2006. The records

indicate that the transportation facility was a conditionally exempt small quantity (CESQ) generator of hazardous waste; however the specific waste stream was not identified. The records also indicate that (as of 2007) the facility no longer generates hazardous waste, and no Resource Conservation and Recovery Act (RCRA) related violations were found in connection with the transportation center. Refer to the attached excerpts from the *EDR Report* [Appendix 7] for additional information.

a. *Describe how and where each hazardous substance or industrial waste was stored at each such property (e.g. underground storage tanks, above-ground storage tanks, landfills, lagoons, etc.). Provide a map indicating the location where these substances were stored;*

   No specific information concerning storage of the above-referenced waste (EPA ID No. NYR000143164) was available. The building's floor drain system collects incidental discharges of waste petroleum fluids and reportedly directs the wastewater to the municipal sanitary sewer through an oil-water separator.

b. *For each property where landfilling operations occurred, identify the generators of the hazardous substances or industrial wastes and the procedures for transportation of the hazardous substances or industrial wastes to and from the property. Describe how hazardous substances and industrial wastes were handled or treated at each property. Provide the names and addresses of all transporters used for each type of hazardous substance or industrial waste. State when each transporter was used and identify the total volume or weight of material that was transported or disposed of by that entity; and*

   No records indicating landfilling activities were found in connection with the property.

c. *For each property that generated hazardous substances or industrial waste, describe the method by which these substances were disposed, including where they were disposed and how, and by whom, they were transported.*

   No waste disposal records were available.

3. *State whether any hazardous substances or industrial wastes were ever released, either intentionally or unintentionally, from each property identified in your response to question 1. Your answer should address, but not be limited to, instances in which any volume of hazardous substances or industrial wastes were spilled, leaked, or caught fire from drums, tanks, or any other• containers. For each release identified in your response to this question:*

   Based on a search of DEC records, two spills were reported in connection with the property (DEC Spill No.'s 9607626 and 9701709). Refer to the responses below and the attached EDR report excerpts [Appendix 7] for additional information.

   a. *Identify when and how each release event occurred;*

- Spill No.'s 9607626 and 9701709 were reported on September 17, 1996 and May 8, 1997, respectively.
- Spill No. 9607626 was reported when diesel-contaminated soil and groundwater was encountered while excavating a utility trench. It was closed by the DEC on August 5, 2002.
- Spill No. 9701709 was assigned following the report of an unidentified material "being pumped out of" a building. However, the DEC subsequently determined that no spill had occurred and accordingly, no response was necessary. This spill was closed on approximately one month after it was reported. Accordingly, all responses to Item No.'s 3-b through 3-g and 4 pertain to Spill No. 9607626 only.

b. *Identify the composition of each of the materials released, including the chemical content, characteristics, and form (solid, liquid, sludge, or gas) and the quantity of each material released;*

No specific quantities were reported in connection with the spill. For additional information, refer to response for Item No. 3a.

c. *Describe the method of release (spill, fire, leak, discharge, etc.) and how the material was containerized (if at all) at the time of release. Describe what response actions, if any, were taken to address these releases;*

No specific information concerning the spill response measures, containment or disposition of wastes, or follow-up information was available within the records reviewed.

d. *Identify the locations at the respective property where each release/disposal occurred. Please enclose a map indicating the release/disposal location;*

No information concerning the location of the spill was available.

e. *If hazardous substances were disposed into drains or drainage areas at any property, describe the nature and the approximate quantity of those wastes disposed each month, and the location to which those wastes drained;*

Refer to Item No. 1-d for information concerning the building's floor drain and OWS system. No information concerning hazardous substance usage or disposal for the prior (i.e., motor freight/truck repair) facility was available.

f. *If any of the substances released into the environment from the City's properties were treated prior to release, describe the treatment process, the years during which treatment occurred, the quantities of substances treated, the chemical composition of discharged treated substances, and whether discharges were continuous or intermittent; and*

No information concerning treatment processes was available.

g. *If the City or one of the City's contractors, lessees, tenants, or agents ever contacted, provided notice to, or made a report to EPA, the New York State Department of Environmental Conservation, Onondaga County, or any other government entity concerning an incident, accident, spill; release, or other event resulting in a release of a hazardous substance or industrial waste, describe such contact, notice, or report and provide copies of all communications between the City and that government entity.*

   Spill No. 9607626 was reported to the DEC by Sandy Lewis of SCSD. Refer to the *EDR Report* [Appendix 7] for additional information.

4. *Describe any environmental response actions (e.g. soil excavation, groundwater treatment, etc.) performed at any of the properties identified in your response to question 1 and provide copies of any documents concerning the response action. Identify the location, dates, and the results of all analyses, tests, or monitoring performed for or in connection with each response action.*

   No specific information concerning the spill response measures, containment or disposition of wastes or follow-up monitoring was available.

5. *Identify all individuals who currently have or had responsibility for the environmental matters (e.g. responsibility for the disposal, treatment, storage, recycling, or sale of hazardous substances or industrial wastes) at the properties identified in your response to question 1. Provide each individual's job title, duties, the dates he or she performed those duties, supervisors for those duties, their current position(s), and the nature of the information possessed by such individuals concerning the City's waste management practices.*

   The SCSD contacts with respect to the spills and RCRA reporting are Sandy Lewis and Dave Delaney, Superintendent of Buildings and Grounds, respectively [*EDR Report*, Appendix 7].

6. *Provide copies of all local, state, and federal environmental permits applied for and/or issued with respect to any property identified in your response to question 1. Provide copies of all notices of violations or administrative or judicial complaints filed by federal, state, county, or municipal governments and their regulatory agencies as well as copies of all judicial complaints filed by other persons, including corporate entities or public interest groups, related to permit violations.*

   The transportation center was formerly a CESQ generator of hazardous waste. The facility no longer generates hazardous waste and no violations were reported.

7. *Has the City or any affiliate, contractor, or individual associated with the City been a party to any litigation, either as plaintiff or defendant, that involved liability for contamination of or from any of the properties identified in your response to question 1? If yes, identify the litigation, describe the nature of the City's involvement in the litigation, and provide a copy of the pleadings and any final order.*

   No information concerning any environmental-related litigation was reported or provided.

8. *Has the City or any affiliate, contractor, or individual associated with the City been accused of any criminal violation in connection with the operations at any of the properties identified in your response to question 1? If yes, describe the nature of the proceeding and provide all documentation associated with the proceeding in your possession.*

   No information concerning any criminal violations was reported or provided.

9. *List all current or prior owners of which you are aware for each property identified in your response to question 1. If known, identify and provide copies of any documents of the following information for each prior owner:*

   a. *the dates of ownership and operations conducted at such times; and*

      SCSD has owned and operated the facility for repair/servicing of district vehicles since the late 1980's or early 1990's. Offices for the transportation and food service departments are also located within the building. A previous building on the property was utilized by the owner(s) for truck repairs. The specific date of transfer of ownership of the property to SCSD was not available.

   b. *all releases of hazardous substances and industrial waste at each facility during their period of ownership.*

      Refer to Item No. 3 for information concerning spills which were reported to the DEC during SCSD's operation of the transportation center. Information concerning releases under prior ownership(s) of the property, if any, is not available.

10. *Describe all instances when the City used material dredged or excavated from Ley Creek or its floodplains at any of the properties identified in response to question 1, including but not limited any events where such material was used as cover or fill. Identify the location, dates, and volumes of material used for each event, and provide all associated documentation.*

    No reports or documentation of the use of dredged or excavated material from Ley Creek or its floodplains were found within the records that were reviewed.

11. *Identify and provide all information and documentation concerning any dredging or excavating efforts the City has performed, or required others to perform, in and around the lower two miles of Ley Creek. Describe, among other things, when each dredging/excavation event occurred, the disposal location(s) of the dredged or excavated material, the purpose for which this work was performed, and who performed the work.*

    Refer to response for Item No. 10.

12. *Supply any additional information that may be used to identify additional sources of information, releases of hazardous substances or industrial waste, or related parties involved with the Lower Ley Creek Subsite;*

Historic Sanborn fire insurance maps [Appendix 4] indicate that the property was occupied by a truck repair facility from the early 1950's through the early 1970's. This era reportedly pre-dates ownership of the property by SCSD.

A gasoline tank was also present on-site, adjacent to the northeast corner of the former building during the 1960's and early 1970's [Refer to Sanborn maps, Appendix 4]. No information concerning disposition of the tank or associated petroleum fluids/sludge was provided within the records that were reviewed.

13. *State the name, title, and address of each individual who assisted or was consulted in the preparation of the response to this Request for Information.*

Thomas C. Ferrara, P.E.
Director of Facilities, Maintenance & Operation, Facilities Management Department
Syracuse City School District
725 Harrison Street
Syracuse, New York 13210

Carmen Malone
Facilities Engineer
Syracuse City School District
1025 Erie Blvd. W
Syracuse, New York 13201

14. *State whether any documents provided in response to this Request for Information have been claimed or marked confidential.*

No documents have been claimed or marked as confidential.

Salina School Apartments:

This property was occupied by *Public School No. 8* in the late 1890's and *Salina School* dating from the early 1900's until the mid-1980's. Residential lots also extended into the southern area of the property in the late 1890's/early 1900's. The building was vacant during the late 1980's and subsequently converted to residential apartments by the early 1990s.

The records that were available do not indicate any reported spills or historic petroleum or chemical storage tanks in connection with the property.

An EPA Identification Number (NYR000135756) was issued to the site in 2005, which is reportedly approximately 15 years after the property was transferred to the City of Syracuse, who then transferred it to a private developer. The specific waste was not identified within the records that were available; however the facility is indicated to be a former conditionally exempt small quantity (CESQ) generator of waste.

Former Eastwood School:

The building that is currently located on this property was occupied by Eastwood High School from the 1930s through the 1950s and Eastwood Junior High School from the early 1960s through the early 1980s. The property was transferred from SCSD to the City of Syracuse, and then to a private developer. It was converted to residential senior citizens apartments by 1990.

An EPA Identification Number (NYD100397710) was issued to the site in 1986, during the period of transition from school to residential occupancy. The owner/operator was indicated to be the City of Syracuse. The facility was listed as a large quantity generator (LQG) of waste which was deemed hazardous due to elevated chromium content. Approximately 3,500 gallons and 3 to 6 drums of the waste transported from the facility in August and September 1986. By 1989 the facility was no longer considered a LQG. No violations were reported in connection with the waste handling activities at the site.

In 2006, a separate EPA ID number (NYR000165159) was issued to the Syracuse Housing Authority for this site, which was identified as a small quantity generator (SQG) of corrosive waste.

No records of reported spills or registered tanks were found within the information that was reviewed.