

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Concord Chemical - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region II

Subject: POLREP #2
Concord Chemical
A255
Camden, NJ
Latitude: 39.9442510 Longitude: -75.0998830

To:

From: Andrew Confortini / Gezahegne Bushra, OSCs

Date: 11/2/2010

Reporting Period:

1. Introduction

1.1 Background

Site Number:	A255	Contract Number:	EP-S2-10-03
D.O. Number:		Action Memo Date:	9/28/2010
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	10/4/2010	Start Date:	10/11/2010
Demob Date:		Completion Date:	
CERCLIS ID:	NJD002355121	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

On August 6, 2010, the U.S. Environmental Protection Agency ("EPA") ERRD received a request from the New Jersey Department of Environmental Protection ("NJDEP"), to evaluate the Site for a Comprehensive Environmental Response, Compensation and Liability Act of 1980, as amended ("CERCLA") removal action.

1.1.2 Site Description

The Site, a former manufacturer of various liquid and powder cleaners and detergents, is located in a mixed industrial, commercial and residential neighborhood. Concord Chemical Company, Inc. ("Concord Chemical") is the current owner of record (Lot 25, Block 1186) and the property encompasses nearly an entire city block. The facility consists of a four-story brick building, above ground storage tank area and open areas that are covered with asphalt, gravel, concrete, or cobble.

1.1.2.1 Location

The Site is located at 17th and Federal Streets in Camden New Jersey and includes nearly an entire city block. The elevation of the Site is approximately 17 feet above mean sea level and its geographic coordinate is 39.944591° latitude and -75.100143° longitude. It is located in a mixed industrial, commercial and residential neighborhood. The building makes up about one-third of the property. There are sidewalks on Federal, Carmen and 17th Streets that are heavily used by residents/passersby in the area. The Borden Chemical Site (a former EPA Removal Action Site) is across Federal Street to the north and three residences are across Carman Street to the south. Youthbuild, a construction trades program center associated with the Housing Authority for the City of Camden, is across 17th Street to the east. The closest residence to the Site, situated within 50 feet of the Site, is on Carman Street. Other residences are located on Federal Street to the northeast of the Site.

1.1.2.2 Description of Threat

The EPA's assessment of the facility documented the presence of hazardous substances, as defined in Section 101(14) of CERCLA, 42 U.S.C. § 9601(14) and determined that a removal action under the CERCLA is warranted. Broken windows and open doorways provide a route for hazardous substances to release into the environment via wind currents. Furthermore, in the event of a fire in the building, the hazardous substances would be released into the air which would result in their migration into adjacent residential neighborhoods. Trespassers entering the building will come in direct contact with hazardous substances and will track/transport the contamination off-site.

EPA has observed drums and small containers that are leaking and several drums that are threatening to release their contents due to the weather freeze and thaw cycles. Contaminants can migrate into the environment through air entrainment of particulates and surface water runoff.

The building also contains deteriorated Presumed Asbestos Containing Material (PACM) insulation that is wrapped on pipe. When friable, asbestos is designated as a CERCLA hazardous substance under 40 CFR Table 302.4. Asbestos fibers from the deteriorating insulation may be released

directly into the environment through broken windows.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

The first and second floors of the building show evidence of recent vandalism including copper stripping and removal. Two open entry points (one window and one door) were discovered on the first floor despite the City of Camden's best efforts to secure the building. Containers of various sizes are scattered throughout the first floor. Over 100, 55-gallon drums are observed including at least 20 hazardous waste (based on labeling) salvage or overpacked drums in the loading dock area. Waste identified on labels included caustics, corrosives and flammable materials.

The second floor contains a large laboratory that has over 1,000 small containers of chemicals, reagents and unknown chemical mixtures. Container labels indicated the presence of acetone, tetrachloroethylene ("PCE"), carbon tetrachloride, 1,1,2,2-tetrachloroethene, chloroform, pyridine, toluene, hydrochloric acid, acetic acid, sulfuric acid, nitric acid, acetic anhydride, butyl alcohol, kerosene, and ammonia in the lab. The second floor contains over 100, 55-gallon drums with labels indicating that contents included sulfonic acid, styrene, isopropyl alcohol, sodium methylate, monoethanol amine, propylene glycol, ethylene glycol, sodium hydroxide, cresylic acid, and ammonia. Some of the containers have open tops and/or material on the drum top that has spilled out of the container. There is evidence of chemical leakage onto the floor and running down the outside wall of the building.

The third floor contains approximately 100, 55-gallon drums of chemicals and various products manufactured at the facility including waxes, soaps and lubricants. Also present are large quantities of combustible packaging materials including cardboard boxes, paper, empty fiber drums, and plastic sheeting.

The basement level contains numerous drums (approximately 100) and 225-gallon capacity plastic totes (approximately 30-50); however, further observations were limited in this area due to low ceilings and poor lighting. Also, a large volume of liquid (up to six inches deep) is present on the floor in the basement due to possible leakage/spillage from containers and pipes. This material is bright green in color or multi colored (brown, white, and orange) depending on the location.

The eastern third of the building from the basement to the third floor houses the mixing tanks and process equipment. Most tanks appeared empty; however at least five contain unknown liquids or solids. Tanks ranged in size from 250 to 10,000 gallons. The tanks, equipment, floor, walls, and piping in this area of the building are coated with process related materials (waxy and soapy residuals).

Pipes throughout the building are insulated with PACM. Much of the insulation is damaged and has either fallen off the pipes onto the floor or onto objects below the pipes. The insulation is exposed to the outside elements and may be releasing to the outside environment through the broken windows on the upper floors.

Six above ground storage tanks ("ASTs"), ranging in size from 15,000 to 20,000 gallons are present outside the building on the southern portion of the property. The tanks appear to be empty; however there is evidence of strong chemical odor emanating from tanks.

The information on the labels of some of the containers, inside the building, indicates flammable and corrosive materials. Labeling on containers in the laboratory and on drums throughout the building indicate the presence of CERCLA designated hazardous substances. Many of these chemicals are believed to have been used as raw materials in the manufacturing processes at the facility. These materials are CERCLA designated hazardous substances as defined in Section 101(14) of CERCLA, 42 U.S.C. § 9601(14). Containers with unknown contents could potentially contain additional CERCLA designated hazardous substances. In addition, the pipe insulation that is PACM and in a friable state is also a CERCLA designated hazardous substance. The Site is defined as a facility under Section 101(9) of CERCLA, 42 U.S.C. § 9601(9). The leakage of unknown chemicals from containers and the damaged PACM constitutes a "release," or threat of "release" of hazardous substances as defined in Section 101(22) of CERCLA, 42 U.S.C. Section § 9601(22).

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

2.1.2 Response Actions to Date

On August 23, 2010, On-Scene Coordinators (OSCs) from the RAB conducted a Site visit as part of a removal assessment. Based upon the information documented and presented, a verbal authorization was requested and on August 25, 2010 the Division Director authorized RAB to initiate a removal action. A 24-hour armed security service was established on September 3, 2010 to deter trespassing and vandalism and minimize the threat of potential fire or explosion. On September 28, 2010, the Action Memorandum to conduct a removal action at the Site was authorized. On September 29, 2010, a warrant from the US Magistrate Judge was granted to access the property for removal action. On October 4, 2010, the EPA met at the Site with its ERRS Contractor, Environmental Restoration, Inc. personnel and began establishment of on-site support facilities. On October 12, 2010, representatives from the United States Coast Guard (USCG) began the evaluation of the building contents, which included drum, tanks, pails and laboratory items. This evaluation identified the following materials*:

TOTAL FOR BASEMENT

<u>container</u>	<u>total</u>	<u>Amount of Finished Product</u>	<u>Total Remaining</u>
55G fiber	129	0	129
250G totes	39	0	39
5gal pails	867	720	147
55gal drums	204	0	204
1gal cont.	312	312	0
unknowns	77		

TOTAL FOR 1ST FLOOR

<u>container</u>	<u>total</u>	<u>Amount of Finished Product</u>	<u>Total Remaining</u>
55G fibers	12	0	12
250G totes	2	0	2
5gal pails	171	140	31
55gal drums	32	8	24
unknowns	37		

TOTAL FOR 2ND FLOOR

<u>container</u>	<u>total</u>	<u>Amount of Finished Product</u>	<u>Total Remaining</u>
55G fibers	62	2	60
250G totes	0	0	0

TOTAL FOR 3RD FLOOR

<u>container</u>	<u>total</u>	<u>Amount of Finished Product</u>	<u>Total Remaining</u>
55G fibers	17	0	17
250G totes	2	0	2

5gal pails	167	22	145	5gal pails	9	0	9
55gal drums	87	16	71	55gal drums	146	4	142
bags	148	119	29	bags	655	643	12
unknowns	124			unknowns	59		

* All numbers and sizes are approximate

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

The owner of this property is Concord Chemical Company, Inc. ("Concord Chemical"). Individuals identified to be associated with the Company's activity were solicited for access to the property. Following to the uncooperative response from individuals, EPA requested the Department of Justice (DOJ) to obtain a warrant to access the property and conduct the removal action. On September 29, 2010, the DOJ granted EPA an Administrative Warrant for Entry upon Property.

2.1.4 Progress Metrics

- **Sampling for screening: 161 Drums from third floor have been sampled.**
- **Inventory: Chemicals in the former Laboratory and Chemical Storage rooms are being listed for identification and disposal purpose**

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

2.2 Planning Section

2.2.1 Anticipated Activities

Starting November 1, 2010, ERRS contractor will begin screening samples from containers to identify, stage and arrange for offsite disposal of hazardous materials within the building.

2.2.1.1 Planned Response Activities

Planned response actions will include: resume container sampling, field hazard characterization and consolidation of empty containers.

2.2.1.2 Next Steps

Container sampling activities and inventorying of laboratory chemicals continue.

2.2.2 Issues

None

2.3 Logistics Section

Not Applicable

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

2.5.1 Safety Officer

Not Applicable

2.6 Liaison Officer

Not Applicable

2.7 Information Officer

2.7.1 Public Information Officer

Not Applicable

2.7.2 Community Involvement Coordinator

Community Involvement Coordinator will be assigned to the Site and a draft fact sheet will be created. Once final the fact sheet will be available in the documents section at www.epaossc.org/concordchemical.

3. Participating Entities

3.1 Unified Command

Not Applicable.

3.2 Cooperating Agencies

- New Jersey Department of Environmental Protection
- City of Camden, Department of Public Works

4. Personnel On Site

1 EPA OSC

8 ERRS – Response Manager and Field Clerk (Environmental Restoration)

2 USCG – Atlantic Strike Team Members

5. Definition of Terms

PACM: Presumed Asbestos Containing Material

ERRS: Emergency Rapid Response Service contract (Environmental Restoration, Inc.)

PCBs: Polychlorinated biphenyls

6. Additional sources of information

6.1 Internet location of additional information/report

1. www.epaosc.net/concordchemical
2. <http://www.osha.gov/SLTC/asbestos/>
3. <http://www.epa.gov/asbestos/>

6.2 Reporting Schedule

POLREP will be issued on a weekly basis.

7. Situational Reference Materials

No information available at this time.