

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Diamond Aerosol - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region II

Subject: POLREP #2
PolRep #2 - RV1 Update
Diamond Aerosol

Glen Gardner, NJ
Latitude: 40.7446025 Longitude: -74.8865295

To:
From: Kelli Lucarino, On-Scene Coordinator
Date: 8/23/2011
Reporting Period: 8/17/2011 - 8/23/2011

1. Introduction

1.1 Background

Site Number:	02QP	Contract Number:	EP-S2-10-01
D.O. Number:	036	Action Memo Date:	
Response Authority:	CERCLA	Response Type:	Emergency
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	8/8/2011	Start Date:	8/8/2011
Demob Date:		Completion Date:	
CERCLIS ID:	NJD049644438	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

This is an emergency removal action.

1.1.2 Site Description

The Site is located in a rural area on approximately 40 acres of mostly undeveloped land, consisting of native vegetation, trees, and underbrush. It is crossed by one natural stream and has a high water table. The land adjoining the Site has been developed with single family residences and approximately 526 people live within a one mile radius of the Site. The Site consists of the following buildings: an old stone barn which housed the original cosmetics business, a large stone house which is the residence of the owner of the Site, two warehouses, and various other out-buildings used for storage, offices, and vehicles.

The Site has served several different operations in the past. Most recently the Site was operated as a research and development ("R&D") facility for internal coatings of aerosol cans. The Site previously was operated by the former Electro Organic Corporation and Diamond Aerosol, both predecessor companies to Diamond East Corporation, which manufactured cosmetics and personal protection devices containing tear gas, pepper spray, and other chemical specialty products for approximately 30 years.

1.1.2.1 Location

The Site is located at 62 Anthony Road, Glen Gardner, Hunterdon County, New Jersey.

1.1.2.2 Description of Threat

The mechanisms for releases to the environment were from releases which occurred from abandonment and improper storage of these materials by the PRP. Sources of ignition through vandalism create a serious threat of release at the Site. Trespassers entering the building may also

come in direct contact with hazardous substances. Trespassers have been found by the police on the property, which prompted the notification of the NJDEP.

The ether compounds are both toxic if inhaled or absorbed through the skin. In case of a fire, they also produce toxic byproducts of combustion (hydrochloric acid and phosgene). Chloroform is highly toxic and may be fatal if inhaled, swallowed or absorbed through the skin. Acetone is highly flammable and incompatible with chloroform and sulfuric acid. The incompatible nature of these materials also poses a possible threat from a chemical reaction or release to the environment.

A continued exposure of the drums and containers to excessive moisture and temperature extremes may cause the drums and containers to further corrode, bulge, and/or leak. Contaminants can migrate into the environment through air entrainment of particles through cracks and openings in the building's roof or walls.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

On July 21, 2011, the New Jersey Department of Environmental Protection ("NJDEP") verbally requested EPA's assistance to evaluate the Site for a CERCLA removal action. Prior to the verbal request, the NJDEP issued the PRP a directive indicating a 14 day time frame to address the threats on site. The PRP indicated he was not able to meet the directive due to health and financial constraints. On July 26, 2011, EPA conducted a site visit as part of a removal assessment. An entry was made into the buildings to assess the conditions. Upon entry, EPA identified more than 600 lab pack containers, more than 50 five gallon containers, and approximately 15 55-gallon drums of hazardous and potentially hazardous substances that were leaking, improperly segregated and in poor condition. Many of the containers were identified by their labels and pose a serious threat of fire. The buildings housing the potentially hazardous substances were observed to be in poor, deteriorating condition. Several signs of vandalism including, cut locks and broken windows were also observed. EPA determined that an immediate response action was necessary to prevent further releases of hazardous substances and to protect public health

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

The scope of work for this removal action includes gathering, characterizing, securing, stabilizing, staging and disposal of hazardous materials.

2.1.2 Response Actions to Date

8/15/11 - ERRS working in warehouse 7 and 8 to collect drums, small containers, and cylinders in these areas. Materials collected were staged at the overhead door closest to the Loading dock near Warehouse 6.

.22 Long rifle shell in glass sample jars were found that appear to contain a blue wax type substance. Investigation has revealed that they are CN shells..(Tear Gas)

8/16/11 - Crew began packaging and screening of small containers in the lab and office areas in Warehouse 1. Petroleum and flammables were bulked into an existing 55 gallon drum with residual oils. Neutral Aqueous liquids were bulked into an existing poly drum for consolidation.

The existing spill of paint in warehouse 4/5 has been cleaned up and the containers has been secured to eliminate any further spillage. Crew packaging flammable aerosols into a lined cubic yard box for future T&D. Pesticide and or chlorinated aerosols are being set aside as other waste streams.

8/17/11 - Continued pouring off materials at Warehouse 1 for consolidation of alike materials. Warehouse 3 has been cleared of drum and containers and staged in warehouse 2 for processing. Existing drums of materials in warehouse 2 were staged for sampling on Thursday.

8/18/11 - Crew continued bulking of field screened and labeled small containers into their waste groups. Sampling and field screening of the 55 gallon drums in warehouse 2 was completed along with screening of the 5 gallon pails collected and staged in warehouse 2.

1 – 5 gallon pail of Capsaicin was found in warehouse 2. The pail was unmarked but during sampling a label was found on the inner poly bag inside the pail but was partially unreadable. MSDS searches based upon partial label information has lead us to believe it is Capsaicin. The characteristics of the material prove to be this is a skin and respiratory irritant.

8/19/11 - 5 composite samples were compiled and sent by Lab Courier to Mid Atlantic Environmental Labs for analysis. These analysis are for T&D parameters. A member from CID visited the site.

8/22/11 - Crew continued bulking of field screened and labeled small containers into their waste groups. New Jersey State Police Bomb Unit removed .22 shells containing tear gas as well as a tear gas grenade and a small cylinder containing tear gas.

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

The PRP has been identified as the owner of Diamond Aerosol.

2.1.4 Progress Metrics

<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

ERRS will continue to gather, stage, secure, and characterize materials for disposal. The crew continues to collect, segregate, and field screen small containers in WA 1, and WA 2.

2.2.1.1 Planned Response Activities

2.2.1.2 Next Steps

ERRS continues to prepare for transportation and disposal activities.

2.2.2 Issues

No outstanding issues.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

2.5.1 Safety Officer

No safety issues to report. ERRS has a Health and Safety Plan on-site.

2.6 Liaison Officer

The Liaison Officer position was not activated for this removal action.

2.7 Information Officer

2.7.1 Public Information Officer

The PIO position was not activated for this removal action.

2.7.2 Community Involvement Coordinator

Pat Seppi is assigned as the CIC.

3. Participating Entities

3.1 Unified Command

The Unified Command was not activated for this removal action.

3.2 Cooperating Agencies

NJDEP referred the site to EPA in July, 2011.

NJSP Bomb Unit has disposed of material containing tear gas.

Lebanon Township Police assisted NJSP with disposal of tear gas items.

4. Personnel On Site

ERRS - 5

EPA - 1

5. Definition of Terms

No information available at this time.

6. Additional sources of information

6.1 Internet location of additional information/report

For current EPA activities:
www.epaosc.org/diamondaerosolv1

For previous EPA activities:
www.epaosc.org/diamondaerosol

6.2 Reporting Schedule

Polreps will be sent on a weekly basis.

7. Situational Reference Materials

No information available at this time.