

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Carville National Leather - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region II

Subject: POLREP #2
EPA Mobilizes to Site for Sampling Event
Carville National Leather
A-295
Johnstown, NY
Latitude: 42.9999750 Longitude: -74.3805440

To:
From: Paul L. Kahn, On-Scene Coordinator
Date: 8/4/2016
Reporting Period:

1. Introduction

1.1 Background

Site Number:	Contract Number:	EP-S2-15-02
D.O. Number:	Action Memo Date:	
Response Authority: CERCLA	Response Type:	Emergency
Response Lead: EPA	Incident Category:	Removal Action
NPL Status: Non NPL	Operable Unit:	
Mobilization Date:	Start Date:	
Demob Date:	Completion Date:	
CERCLIS ID:	RCRIS ID:	
ERNS No.:	State Notification:	
FPN#:	Reimbursable Account #:	

1.1.1 Incident Category

Abandoned leather tannery.

1.1.2 Site Description

The Site is a former leather tannery that had been operating as a tannery since 1976. In 2009 there was a series of minor fires that caused a business interruption for a few months. In 2012, following a major downturn of military contacts, business began to suffer and the company began a gradual fiscal decline. In 2013 the tannery closed its doors and the owner filed for Chapter 11 (reorg) bankruptcy protection. There is no record of any actual reorganization of the business. No property taxes have been paid since 2012, and the Site, for all intents and purposes, appears to have been abandoned.

1.1.2.1 Location

The Site is located in a heavily treed residential neighborhood. It is surrounded by trees on three sides and the Cayadutta Creek, a navigable waterway of the US, borders the site on the south side of the property. A former RR right-of-way which was converted to a bike/walking trail, also borders the Site on the south side of the property adjacent to the creek.

1.1.2.2 Description of Threat

The threat is the presence of hundreds of drums and other containers of chemicals in an abandoned tannery that has no power or functioning fire detection/prevention system. Some of the entrances to the premises were unlocked and vandals have overturned drums of chemicals. A red leather dye was spilled inside the building and it has migrated outside the building and into a parking lot.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Results of a walk-thru inspection by two OSCs in mid-July revealed the presence of hundreds of drums and other containers of chemicals. Some were labeled as acid or corrosive, and one drum is labeled as formic acid, a CERCLA Listed Hazardous Substance. A large AST is located behind the main building and it may contain fuel oil or process chemicals. A small building housing a filter-press also contains drums of a corrosive liquid.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

2.1.2 Response Actions to Date

Current activity is in bold letters.

Two Region 2 OSCs visited the Site in mid-July and inspected the building. Afterwards they met with City officials who agreed to lock and secure any accessible openings. Another Site visit is planned for early August to acquire chemical samples and haz-cat some containers. A full inventory of chemical containers will also be compiled. The AST will be accessed to determine if it contains any oil or chemicals.

On 8/4/2016 the OSC and a team of ERT/SERAS contractor personnel mobilized to the Site and haz-cated 21 drums of chemicals with the following results:

- 1 pH 1 RCRA D002 Corrosive Waste
- 1 pH 2 RCRA D002 Corrosive Waste
- 1 PCBs > 50 ppm TOSCA regulated
- 3 highly flammable/ignitable
- 1 aluminum sulfate is a CERCLA listed Hazardous Substance
- 1 chlorinated toluene is a CERCLA listed Hazardous Substance
- 1 kerosene/water combo

Drum labels indicate the presence of, among other chemicals, sodium hydroxide, sulfuric acid, formic acid, nitric acid and "oil processing leather".

A rough drum count was made as follows: Totes: 4 with a total of 1,000 gals; 55-gallon: 70 full/partial, 1 drum over-pressurized & 1 drum under-pressurized. 30-gallon: 50; 5 gallon: 70, 1 container may have crystals around the bung. In addition to the chemical containers there are two ASTs, one inside and one outside, that may contain product. There may also be a chlorine gas source in the former WWTP.

There are 22 drums of mostly dye pigment that were overturned by vandals and spilled inside the main building. Most of this material is puddled on the first floor of the building, although a red dye had migrated from the building into the parking lot.

Also on 8/4/2016, verbal authorization to initiate a removal action at this site and contractor funding was obtained.

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

Two PRPs have been identified from newspaper articles and bankruptcy court filings. One PRP may reside in Florida, and the other one may reside in Savannah GA. Efforts are currently underway to confirm the identity/location of PRPs so that EPA can obtain written access to the Site.

The OSC obtained a copy of the current property deed from the Fulton County Clerk.

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

Mobilize cleanup contractor crew to the Site and set up removal support facilities.

2.2.1.1 Planned Response Activities

See above.

2.2.1.2 Next Steps

Secure all doors to the premises and the waste water treatment plant. Clear weeds and underbrush from perimeter of premises. Set up barrier fence between adjacent jogging path and Site. Set up command post trailer and generator.

2.2.2 Issues

The PRP has not yet granted EPA written access beyond the haz-cating event on 8/4.

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

No information available at this time.

3. Participating Entities

3.1 Unified Command

3.2 Cooperating Agencies

NYSDEC

City of Johnstown

4. Personnel On Site

None currently.

5. Definition of Terms

No information available at this time.

6. Additional sources of information

6.1 Internet location of additional information/report

<https://en.wikipedia.org/wiki/Tanning>

6.2 Reporting Schedule

7. Situational Reference Materials

See Documents Section for Fact Sheet on leather tanning.