

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region II

Subject: POLREP #8
Carville National Leather
A-295
Johnstown, NY
Latitude: 42.9999750 Longitude: -74.3805440

To: Andrew Raddant, Department of Interior
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Date: 9/19/2016

Reporting Period:

1. Introduction

1.1 Background

Site Number:	A-295	Contract Number:	EP-S2-15-02
D.O. Number:	045	Action Memo Date:	
Response Authority:	CERCLA	Response Type:	Emergency
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	8/10/2016	Start Date:	8/8/2016
Demob Date:	9/22/2016	Completion Date:	
CERCLIS ID:	NYD002193795	RCRIS ID:	NYD0002840000
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 family-owned leather tannery that had been operating as such since 1976. Eighty percent of its business was contracts with the Dept. of Defense. Prior to that it was owned/operated as Knox Gelatin factory. In 2009 Carville Leather experienced a series of minor fires that caused brief business interruption. In 2012, following a major downturn of military contacts, business began to suffer and the company began a rapid fiscal decline. In 2013 the tannery closed its doors and the owner filed for Chapter 11 (reorg) bankruptcy protection, but there is no record of any actual reorganization of the business. No property taxes have been paid since 2012, and the Site appears, for all intents and purposes, to have been abandoned by its owners.

1.1.2.1 Location

The Site is located in a heavily treed, partial 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 accessed the building and overturned drums of chemicals. A red dye was spilled inside the building and it 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 corrosive liquids.

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 given to the OSC.

On 8/10 ERRS and the OSC mobilized to the Site to initiate the removal action. ERRS cleared weeds and underbrush from the perimeter of the building and strung barrier fence parallel to the jogging trail that runs along the west side of the main building. On 8/11 ERRS prepared a drum staging area in the main building. The OSC contacted Aeries Chemical Co., Beaver Falls, NY and the company agreed to pick up all of their unused chemicals on an as-found basis. The OSC had ERRS relocate one drum of NaOH, an empty chemical tote and one 55-gallon drum of Aeries anti-floc agent from the WWTP to the staging area. ERRS also moved two other Aeries totes totaling almost 400 gallons of NaOH to the storage area. Tentative pick up date for these chemicals is 8/19.

On 8/11 the office and crew trailers were set up and connected to the generator.

During the week of August 15, 2016 ERRS relocated approximately 120 full/partial drums of chemicals from locations around the Site to the drum staging area. Relocating containers will continue into next week. Approximately 75% of all containers are unlabeled and/or unknown.

ERRS has been directed to group together containers from various suppliers, such as Aries Chemical, Tannin Corporation, and Whitmore Chemical. As these groupings are consolidated the OSC will contact those companies (as with Aries Chemical) to request they retrieve their products. Every container returned to the original supplier as returned goods is one less container EPA will have to ship for disposal. In many instances the chemicals can be re-introduced into commerce, resulting in a *double* positive environmental and financial benefit.

ERRS started collecting empty, and RCRA empty, containers for staging pending T & D. Request for Proposals will be issued for T & D for these containers, with recycling and/or energy recovery the preferred

disposal method.

ERRS chemist to be on Site 8/22 to start haz-cating containers. As the contents are identified ERRS will stage the drums by compatible groups for TCLP sampling.

ERRS remediated the extensive chemical spill caused by vandals inside the building prior to EPA involvement. The spill was absorbed into Speedy-dri and bulked into drums pending sampling for T & D. Trespassing into the Site seems to have been stopped; no incidents of unauthorized entry have been observed since last week.

The pick up of returned goods by Aries Chemical (Beaver Falls, NY) was rescheduled to 8/26 as a result of a miscommunication. Aries has assured the OSC their truck will be on Site next Friday.

OSC distributed informational flyers to residences around the Site and at the Johnstown Library.

The OSC has requested an attorney in ORC be assigned to this Site.

During the week of 8/22 ERRS continued relocating containers from around the Site to the drum staging area on the first floor of the main building. However, there were too many containers to fit them all into the staging area, so satellite staging areas have been set up at locations around the Site, such as next to the Pigment Room. Containers are moved to these mini-staging areas and will be sampled there, then they can be bulked and moved into the main staging area.

ERRS also moved all containers out of the basement and upper floors, so all containers are now located at the first floor staging areas.

ERRS Chemist and one Tech are numbering each container with a volume of 5 gallons or more and have started haz-cating containers to establish compatible chemical groups.

On 8/26 Aries Chemical (Beaver Falls, NY) picked up 2 partial totes, one empty tote, and one full drum of their products as returned goods. The total was 425 gallons that will not have to be shipped for disposal by EPA.

On 8/29 employees of Colonial Leather (Gloversville) toured the drum staging area and selected 6 drums and 1 tote of chemicals that they can use in their tanning/WWT process.

On 8/30 Colonial Leather retrieved 6 drums (330 gallons) of usable chemicals. They rejected the tote of Tannin Corp DG-1 cleaner. This tote will be added to the list of returned goods going to Tannin Corp.

Also on 8/30 the attorney for Tannin Corp. spoke with the OSC on details of his client retrieving all containers with Tannin Corp labels. Pick-up date TBD. The OSC also mentioned a large number of drums found at the Site that were imported by TFL Inc., and consigned to Tannin Corp.

By 9/1 ERRS completed haz-cating almost all of the hard containers at the Site, as well as dozens of bags of leather dye. All container/haz-cat information was entered into Drum Trak for future reference and for [container] inventory control.

A request for proposal was issued by ERRS for recycling/energy recovery for the empty poly and fiber drums, and recycling the steel drums.

A request for proposal for laboratory services was issued by ERRS. Composite samples from compatible waste streams will be sent to the winning bidder. Lab analyses will be used to profile waste streams for T & D.

Bid reply for the poly drums was received and awarded to Wheelabrator Corp, Hudson Falls, NY. Drums will be incinerated at this waste-to-energy company and converted to electricity.

The OSC transferred \$24,000 in unused funds from the ERT account to the ERRS account.

On 9/8 ERRS began bulking neutral liquids into 300-gallon totes.

Also on 9/8 the OSC contacted Consolidated Color Co. (Wakefield MA) about the drums of pigments that bear their label. The contact person there said they would take back any container that had contents that matched the label information. The company agreed to send a salesman to the Site to view the drums. The OSC forwarded some photos of their drums and an approximation of the number of containers.

On 9/9 ERRS completed bulking first 300-gallon tote.

On 9/12 ERRS completed bulking the second tote with neutral liquids.

On 9/13 a rep with Consolidated Color Co. visited the Site to inspect the 50 containers of their product that are on the Site for possible commercial use. Unfortunately none of the contents of the Consolidated Color containers were the actual products in as-shipped condition, so the supplier declined to accept the containers as returned goods.

On 9/19 ERRS completed bulking neutral liquids into the third tote.

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>
Aluminum sulfate (50%)	Liquid	350 gals	n/a	n/a	Returned to Aries Chemical
Caustic cleaner	Liquid	55 gals	n/a	n/a	Returned to Aries Chemical
Caustic cleaner	Liquid	55 gals	n/a	used	Given to Colonial Leather
Lionase AF-15	Liquid	55 gals	n/a	used	Given to Colonial Leather
Leather Strip A	Liquid	55 gals	n/a	used	Given to Colonial Leather
Leather Strip A	Liquid	55 gals	n/a	used	Given to Colonial Leather
Leather Strip A	Liquid	55 gals	n/a	used	Given to Colonial Leather
SEG	Liquid	55 gals	n/a	used	Given to Colonial Leather

2.2 Planning Section

2.2.1 Anticipated Activities

Continue grouping containers by compatible waste streams.

Award subcontract for laboratory services.

Commence composite sampling for profiling waste streams.

Continue shipping chemicals back to original suppliers as returned goods.

2.2.1.1 Planned Response Activities

See above.

2.2.1.2 Next Steps

2.2.2 Issues

None

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

2.4.1 Narrative

In order to conserve funds, the following operational changes were implemented as of 9/15:

--Overtime was stopped.

--The work week was changed to 4 10-hour days, Monday through Thursday.

--Five of the 7 contractor personnel working at the Site will check out of their hotel rooms Friday morning and check back in the following Monday.

It is estimated that the above measures will save approximately \$3,000 a week.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$200,000.00	\$0.00	\$200,000.00	100.00%
TAT/START	\$20,000.00	\$0.00	\$20,000.00	100.00%
REAC	\$30,000.00	\$0.00	\$30,000.00	100.00%
Intramural Costs				
Total Site Costs	\$250,000.00	\$0.00	\$250,000.00	100.00%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

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

EPA: 1 OSC

ERRS: One Response Manager, three Techs, one Equipment Operator, one Field Accountant, one Chemist.

5. Definition of Terms

No information available at this time.

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

Link to You Tube video of ERT Site Assessment with OSC on 8/3 - 8/4, 2016.

<https://youtu.be/uWrW9E2PHYI>