

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region II

Subject: POLREP #19
Completion of On-Site Removal Activities
Carville National Leather
A-295
Johnstown, NY
Latitude: 42.9999750 Longitude: -74.3805440

To:
From: Paul L. Kahn, On-Scene Coordinator
Date: 12/16/2016
Reporting Period:

1. Introduction

1.1 Background

Site Number:	A-295	Contract Number:	EP-S2-15-02
D.O. Number:	045	Action Memo Date:	9/21/2016
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:		Completion Date:	12/16/2016
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 contracts, 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 nor 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 9/20 ERRS bulked neutral liquids into a fifth tote, totaling more than 1,500 gallons of waste.

As of COB 9/21 removal activities at the Site temporarily stopped pending additional funds.

On 9/21 additional funds have been allocated to this removal action. Removal activities will resume on 9/26/2016.

On 9/26 the OSC and ERRS crew traveled back to the Saratoga area. On 9/27 the full crew and all rental equipment were on-Site and removal activities have resumed.

On 9/27 ERRS completed bulking the 6th tote of neutral liquids and the Chemist is preparing composite samples for disposal profiling.

OSC provided the Johnstown FD with a placement plan map showing the location of the individual/bulked containers of chemicals staged inside the main building. A tour of the Site will be offered to the FD when bulking is completed.

On 9/29 ERRS completed bulking Tote #7 with combustible neutral liquids, bringing the total to over 2,000 gallons for this waste stream.

On 9/29 an air conditioner service company inspected the A/C units in main building and stated that there is no residual Freon in the A/C system.

Small pieces of the façade of the main building are spalling and falling into a parking area. This area has been cordoned off for safety concerns.

On 10/4 ERRS opened a side access port on the large above ground storage tank. The tank was stuck and is totally devoid of liquid. A four-gas meter was inserted and all readings were the same as background.

On 10/4 ERRS erected the containment pool for the empty drum rinsing area and staged a lined roll off which will be used to transport the poly drums for energy recovery.

On 10/4 ERRS bulked 4 drums of acid wastes.

Also on 10/4 the OSC and RM checked out a second storage tank in the sub-basement. This tank is heavily insulated and appears to be either a steam or hot water tank because it's connected to a small boiler in the basement. The RM struck the tank with a hammer and it rang hollow; tank was marked accordingly. This accounts for the last of two storage tanks located in the main area of the Site.

On 10/5 the laboratory TCLP results of the filter cake sample were received. Analysis revealed heavy metals orders of magnitude less than RCRA waste regulatory levels. This is most likely because Carville Leather did not engage in leather tanning, it was a *finisher* of already-tanned leather. The low concentrations of heavy metals is probably an artifact of residual tanning chemicals that were eventually removed during the washing/finishing processes at Carville. Consequently the filter cake is non-hazardous and will be left in-place inside the WWTP.

On 10/5 the OSC and RM entered the former WWTP building to search for gas cylinders/reservoirs. One vertical pressure tank was identified as a possible chlorine tank and it will be investigated when a chlorine monitor arrives on the Site.

During the recon in the WWTP 6 process tanks were identified, including the possible chlorine tank mentioned above. Three tanks contained chemicals: one tank contained an unknown liquid, another contained a crystallized material, and a third tank, a "pH control" tank, has some sludge and liquid inside. The contents of these three vessels will be removed and bulked for T & D. The suspected chlorine tank will be tested during the week of 10/10.

On 10/7 bids came in for PPE disposal in landfill. OSC asked ERRS to rebid this non-haz waste stream to *include* disposal other than in a landfill.

Also on 10/7 ERRS emptied 3 of 6 process tanks in the WWTP. The contents will be haz-catted and bulked according hazardous constituents. Ten lab pack containers, including one marked "sulfuric acid", were also removed from the WWTP and bulked.

As of 10/8 all of the liquid storage tanks in the former WWTP have been cleared, the A/C system has been cleared, and about 90% of the chemical containers have been bulked and/or (some) retrieved by original suppliers or local users.

On 10/13 ERRS completed set up of empty drum wash station and processing of empty poly drums has commenced. After being washed and drained, the poly drums are cut in half and bulked in a lined roll-off.

As of 10/13 ERRS continues sampling of containers for T & D profiling.

As of 10/14 all chemicals inside the former WWTP have been bulked for T & D.

Tannin Corp. continues to determine if it can reuse their chemicals as returned goods.

Twenty boxes of old papers and cardboard have been recycled to reduce the fire-load inside the main building.

City of Johnstown served foreclosure papers on Carville National Leather, Inc. Copy forwarded to ORC.

On 10/19 Tannin Corp., a chemical supplier, retrieved almost 1,000 gallons of unused leather processing chemicals from the Site at no cost to the Government. Chemicals were transported to Tannin in Peabody MA for reuse.

On 10/21 samples from each container were shipped to the lab for analysis for T & D profiling.

Removal activities are heading to completion. During the week of 10/24 ERRS continued to rinse and cut poly and metal drums for T & D and performed general housekeeping activities. Subcontract awarded for T & D of the used PPE. Ironically the cost of incinerating the PPE is \$1,400 less than land disposal, so the choice of incineration is cost-effective and permanent, as per the NCP.

Also during the week of 10/24 ERRS began over-packing fluorescent light bulbs in padded shipping boxes. This is practically a free means of recycling. Fluorescent light bulbs contain mercury and are considered to be a Universal (hazardous) Waste by both the EPA and NYSDEC.

During the week of Nov 1 ERRS completed rinsing and bulking poly drums into a 30 yard roll-off for T & D. ERRS continued collecting fluorescent light bulbs for recycling and bulked two roll-offs of used PPE and poly sheeting which will also be sent to Wheelabrator in Hudson Falls NY for waste-to-energy disposal.

On 11/7 ERRS received Part I (solids) of the analytical report for the 8 bulked samples sent to the lab for TCLP analysis. With the exception of three samples that tested positive for Reactive Sulfides and some ppb levels of heavy metals, all TCLP parameters were non-detects.

On 11/8 Part II (liquids) analytical report on 17 samples was received from lab. Results somewhat consistent with original haz-cat testing from August, 2016. Results show RCRA waste Corrosives (pH less than 1; greater than 13), Reactive Sulfides, TCLP Metals (Cr), and Ignitables. Other waste streams are Combustibles liquids. This data, together with Part I analytical and the haz-cat results, will be used to work-up an RFP for Transportation and Disposal of all chemical waste streams.

On 11/10 one 30-yard roll-off containing approximately 4 tons of rinsed poly drums was shipped from the Site to Wheelabrator (Hudson Falls NY) for energy recovery. ERRS shipped 8 liquid samples from the poly drum rinse water to the lab for analysis.

On 11/16 the second roll-off of used PPE (30 cu. yds.) was shipped to Wheelabrator in Hudson Falls, NY for waste-to-energy recovery. Total amount of used PPE sent for recycling is 60 cubic yards.

Also on this date two reps from the Johnstown FD visited the Site at the invitation of the OSC. The OSC showed them where the chemicals are staged in the main building and explained that a significant amount of fire load in the main building, such as wood pallets, plastic drums, and paper files has been removed and recycled. This information was duly noted and appreciated by FD reps.

As of COB 11/16 the crew is temporarily demobed for the Thanksgiving holiday. The last few samples from the waste streams and from the 8 totes of drum rinse-water are being analyzed at the lab. ERRS has removed the string lights and packed unused PPE/supplies; the generator will be stowed inside the main building. Crew remobe to the Site will occur after a subcontract for T & D is awarded and a date for shipping all waste streams for disposal is determined. It is anticipated that the remobe will occur within 2 to 3 weeks from today.

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. Access to the Site was granted verbally to both the OSC and EPA Site attorney. The OSC obtained a copy of the current property deed from the Fulton County Clerk and has given copies to the EPA attorney.

A reduced ERRS crew mobilized to the Site on 12/12 to plow snow from access road and around the main building, and to prepare for T & D of all remaining waste streams. On 12/14 the OSC met with the manager of the Johnstown-Gloversville POTW to arrange for a one-time discharge of rinse water into the sanitary sewer. The OSC hand-delivered a letter to the POTW outlining the plan to discharge 2,400 gallons of rinse water to the sanitary sewer.

On 12/15 approval was granted by the POTW to discharge the rinse water at a cost of 10 cents a gallon. Discharging 4 totes was completed on 12/15. Also on 12/15 the remaining chemical wastes were loaded onto a common carrier and transported to Cycle-Chem in NJ for disposal. The remaining 4 totes of rinse water will be discharged into the POTW on 12/16.

This removal action is scheduled to conclude at COB on 12/16.

On 12/16 all removal response activities as specified in the Scope-of-Work described in the Action Memorandum signed on 9/21/2016 have been completed. The City Engineer who was the POC with EPA throughout the removal action has been notified by telephone, and a close-out letter to the City as well as the NYSDEC will be forthcoming.

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
e-Waste	Solid	325 lbs	n/a	recycled	Evolution Recycling, G-ville NY
Fluorescent bulbs	Solid	300+	n/a	recycled	Cycle-Chem, Elizabeth, NJ
Poly drums	Solid	4 tons	n/a	waste-to-energy	Wheelabrator, Hudson Falls NY

Used PPE & poly sheeting	Solid	60 cu yds	n/a	waste-to-energy	Wheelabrator, Hudson Falls NY
Metal drums	Solid	350 lbs	n/a	recycled	Evolution Recycling, G-ville NY
Tote	Liquid	300 gals	n/a	reused	Tannin Corp, Peabody, MA
Misc. chemicals	Liquid	500 gals	n/a	reused	Tannin Corp. Peabody, MA
Misc. chemicals	Liquid	120 gals	n/a	reused	Tannin Corp. Peabody, MA
Wood pallets	Solid	30 cu yds	n/a	mulch	Fulton County LF
Drum rinse water	Liquid	2,400 gals	n/a	discharged to POTW	Johnstown-Gloversville Waste Water Treatment Plant
Misc.chemical wastes	Liq. & solid	32 containers	016114028JJK	various treatment methods	Cycle-Chem, Elizabeth, NJ and others

2.2 Planning Section

2.2.1 Anticipated Activities.

Send close-out letter to City of Johnstown

2.2.1.1 Planned Response Activities

See above.

2.2.1.2 Next Steps

See above.

2.2.2 Issues

None.

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.

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

No information available at this time.

