

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region II

Subject: POLREP #22
Carville National Leather
A-295
Johnstown, NY
Latitude: 42.9999750 Longitude: -74.3805440

To: Andrew Raddant, Department of Interior
Frank Csulak, National Oceanic & Atmospheric Administration
Eric Mosher, USEPA , Region 2, ERRD-RPB
Tim Grier, USEPA Headquarters 5202G
Paul Zammit , USEPA Region 2 OIG
Mary Mears, USEPA, Region 2, PAD
Andrew Frank, NYSDEC
Chris Vose, City of Johnstown
Bruce Heberer, City of Johnstown
Margo Ludmer, USEPA
Elias Rodriguez, USEPA Region 02, PAD
Shawna Hoppe, USEPA

From: Paul L. Kahn, On-Scene Coordinator

Date: 1/20/2017

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:	1/19/2017	Start Date:	1/19/2017
Demob Date:		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 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.

On 1/13/2017 the Johnstown City Engineer notified the OSC that red dye was leaking from the loading dock at the rear of the main building as a result of residual dye being washed from the building by heavy rain and snow melt. On 1/17 the City Engineer forwarded pictures of the dye released from the building.

NOTE: Bulk quantities of this dye and similar dyes were removed during the removal action last year. Based on lab analysis of the dye it is non-hazardous. The primary concern is the esthetic effect the dye may have if it discolors the Cayadutta Creek, adjacent to the Site, and the Mohawk River downstream from the Site.

Based on the available information the OSC contacted the NYSDEC Region 5 office and coordinated a response. On 1/17 the OSC notified the EPA ERRS contractor and directed the contractor to meet the OSC at the Site on 1/19 to assess the situation and mitigate the release. On 1/18 the OSC notified the EPA Region 2 Public Affairs Division (PAD) of the situation. PAD and the OSC decided that the most prudent response in terms of public information would be to issue a Press Bulletin (PB) regarding the release and the EPA response action. The PB was in fact issued on 1/18 and a copy is posted on the Site web site.

On 1/19 the ERRS contractor and OSC mobilized to the Site. ERRS removed frozen dye with shovels and bulked it into 55-gallon drums. The OSC and ERRS crew investigated the water leaks and found a cracked roof drain pipe on the 3rd floor. The water found a crack in a pipe chase and was dripping onto the 2nd floor, running across the floor to another cracked pipe chase that led to the first floor where the dye stain was located. Water got under the poly sheeting covering the stain and flowed to the loading dock where it was released to the rear of the property near the Cayadutta Creek. Low temperatures froze much of the dye-stained water that was released, but daytime thawing caused the ice to melt and spread the dye across the ground.

Johnstown City Engineer visited the Site and was briefed by the OSC. City is in accord with EPA's response efforts and offered logistical support as requested. OSC asked the City to spread salt on the ice in the immediate area of the loading dock for worker safety and the City graciously assisted EPA in this regard.

ERRS patched the cracked pipe and is using sorbents to remove as much dye from the first floor as possible. Current plan is to use shop vacs to remove as much liquid as possible and sorbets to grab the remainder. Liquid will be bulked into totes and sorbent will be bulked into cubic yard boxes. Attempts will be made to use a floor sealer to cover the dye that is not able to be remoAdditional dye has puddled in the basement and will also be removed.

The patch on the cracked roof drain failed and the leak continued. ERRS cut out the cracked section, replaced it with a flexible drain pipe, and ran the pipe out a window, diverting the water out of the building. This resulted in about a 98% decrease in water inundating the first floor where the dye is located. With the water flow essentially stopped, ERRS is drying the floor so that a sealant can be applied. Concurrently, ERRS lifted the bridge plates on the loading dock, revealing two reservoirs containing 3 inches of frozen dark red water and debris (see Images section). This is the source of the red dye being released to the ground. ERRS is using portable heaters to soften the ice which is then shoveled into drums. ERRS will continue to mitigate this 'chemical slurpee' over the weekend.

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.

2.1.4 Progress Metrics

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

2.2.1 Anticipated Activities.

Send notification to the NYSDEC reporting this new release and how it was mitigated.

2.2.1.1 Planned Response Activities

Continue clean up as detailed in Operations Section.

2.2.1.2 Next Steps

Continue response action to mitigate the release of the red dye..

2.2.2 Issues

None.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

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%
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* 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

ERRS Contractor 1 RM, 1 Operator and 4 Techs, other personnel as needed.

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.

POLREP #22 Last Updated 1/31/2019