United States Environmental Protection Agency
Region II
POLLUTION REPORT

Date: Thursday, January 26, 2006
From: Dilshad Perera

Subject: Westwood Chemical
46 Tower Road, Middletown, NY
Latitude: 41.4687500
Longitude: -74.3772800

POLREP No.:	10	**Site #:**	WN
Reporting Period:		**D.O. #:**	13
Start Date:	3/3/2005	**Response Authority:**	CERCLA
Mob Date:	3/8/2005	**Response Type:**	Time-Critical
Demob Date:		**NPL Status:**	Non NPL
Completion Date:		**Incident Category:**	Removal Action
CERCLIS ID #:		**Contract #**	EP-W-04-055
RCRIS ID #:	NYD072710502		

Site Description

See PolRep No.1

Current Activities

September 30th Through December 14th, 2005

As of November 17th, 2005 EPA had completed the removal from the Site of the hazardous substances and other waste materials as contemplated by the Action Memoranda dated April 15, 2005 and October 31, 2005, and had shipped such materials off-Site for disposal.

Summary of the wastes shipped are as follows:

- **Wastewater:** 353,035 gallons shipped via 73 tanker trailers 6,000 gallon capacity each) to Onyx Greentree, Kersey, PA for disposal.

- **Silver Bearing Wastewater:**38,775 gallons shipped via 8 tanker trailers (6,000 gallon capacity each) to Chambers Works DuPont, Deepwater, NJ. This waste stream was shipped as hazardous waste as D011, RCRA Toxicity Characteristic for silver.

- **Labpacks:** 23 drums totaling 987 pounds were shipped to Cycle Chem, Lewisberry, PA for disposal. 21 drums totaling 687 pounds were shipped as RCRA designated hazardous waste. Examples of some of the RCRA codes include Characteristic of Ignitibility, Corrosivity and Reactivity, Toxicity Characteristics for arsenic, barium, lead and mercury.

- **Selenium Totes:** 27 tons of gel like material found in some of the totes that were designated as RCRA Toxicity Characteristic for Selenium were shipped to Max Environmental Technologies, Yukon, PA for disposal.

- **RCRA Hazardous Containers:** 212 drums (55 gallon capacity each) totaling 11,660 gallons of RCRA designated hazardous waste were shipped to: Environmental Enterprises, Inc., Cincinnati, OH; EQ Detroit, Inc., Detroit, MI; Michigan Disposal Waste Treatment Plant, Belleville, MI; and Petro-Chem Processing, Inc., Detroit, MI for disposal.

- **Debris Roll-Offs:** 1,680 tons of debris generated from polyethylene and fiberglass tank disassembly, Polyvinyl chloride process lines, spent Personal Protective Equipment, dry in-process and raw chemicals were shipped to Onyx Greentree, Kersey, PA for disposal.

Empty Totes: 277 empty totes were shipped to Recycling Inc. East, South

Plainfield, NJ for recycling of the polyethylene bladder and metal cage.
- **Soda Ash:** 38,750 pounds were shipped to Chemical Distributors, Inc., Buffalo, NY for reuse.

Reusable In-Process and Raw Chemicals: 199,600 pounds and 32,108 gallons of raw and in-process chemicals were shipped to Summit Research Labs, Huguenot, NY for re-use.
- **Non-RCRA Hazardous Waste:** 126 drums (55 gallon capacity each) totaling 7,150 gallons were shipped to General Environmental Management, Cleveland, OH for disposal.

See Disposal Tracking See Disposal Tracking document for a detailed accounting of the disposition of waste generated at this site. During the course of the removal action 73 polyethylene and fiberglass tanks were disassembled, chopped up and placed into debris roll-offs that were sent for disposal as discussed above. Four glass lined steel tanks; (3 of which were approximately 10,000 gallon capacity and 1 was approximately 100 gallon capacity) were not disassembled; however, they were thoroughly rinsed out with a pressure washer to remove residual material. All rinse water generated from this operation was consolidated into the frac tanks and disposed of as part of the wastewater waste stream. Three dryers, referred to as #8, #15 and #14 dryers (the number designates the diameter of the dryer as measured in feet) were cleaned with a pressure washer, with the rinse water collected and disposed of with the wastewater discussed above (EPA had determined that pressure cleaning would remove from these dryers contaminants that could pose a threat and EPA had been advised that these dryers could not be disassembled, cleaned and reassembled by EPA in an economically feasible manner).

All building walls and floors were pressure washed to remove settled aluminum chlorohydrate and aluminum zirconium chlorohydrex powder. The rinse water from this operation was collected and disposed of with the wastewater discussed above.

All hazardous substances shipped offsite for disposal were sampled for proper disposal characterization. Prior to shipment for treatment and disposal, EPA consolidated waste water into 5 frac tanks (21,000 gallon capacity each) that it brought to the Site. As each frac tank was filled, and prior to arranging for transport to an offsite disposal facility, a sample was submitted for analysis to ensure that the wastewater waste stream met the profile established for disposal. As the wastewater stream diminished, the frac tanks were cleaned and returned to the rental facility.

On October 28, 2005, analytical results were received for the wastewater that had been contained in two of the frac tanks (FT-4 and FT-5). Both exceeded RCRA Toxicity Characteristic for silver. The waste stream was shipped offsite for disposal at an approved RCRA facility (second bullet above). EPA believes that certain of the totes at the Site were the source of the silver in this waste stream.

As part of the removal action, EPA conducted soil sampling at 58 locations and conducted water sampling at the three monitoring wells that were installed in the late 1980s. Some of the soil samples were composited with one another based on proximity of the locations. In total, 89 soil samples were submitted for analyses: these include discrete and composite samples taken at the surface, 6 inch and 1 foot intervals. The sampling was concentrated in the non-vegetative areas to the west of the production building where there appeared to be obvious discharge areas, and south eastern paved parking area, where gelatinous seep was noted in late winter through early summer. Since there had been no indications that Westwood used large quantities of organic raw material in its manufacturing process. The analytical parameters selected were heavy metals, soil pH, chlorides and Zirconium. The analytical results are below the New York State Department Environmental Conservation (NYSDEC), Division of Environmental Remediation's (DER) Technical and Administrative Guidance Memorandum (TAGM) 4046, Table 4 - Heavy Metals. However, since extensive areas of dead vegetation have been noted, the data and accompanying map has been forwarded to a scientist within US EPA's Environmental Response Team (ERT) and US EPA, Region II's Pre-Remedial program as well as NYSDEC-DER for final evaluation and recommendations.

On October 31, 2005, a $2 Million Statutory Exemption and Ceiling Increase Action Memorandum was approved by the Regional Administrator of EPA Region 2, approving a Total Project Ceiling of $2,450,000. The increase in funds authorized by the October 31 decision document had been recommended by EPA Region 2's Response and Prevention Branch in the event that analysis of the soil data is to lead to a future decision to address soils at the Site. On November 21, 2005 a site tour was conducted by the on-scene coordinator ("OSC") and the Earth-Tech response manager. Persons present at the tour included counsel to the bankruptcy trustee, a representative from each of New York State Department of Health and NYSDEC-DER, as well as personnel from EPA's Office of Regional Counsel and from the United States Attorneys Office. The purpose of the tour was to describe the status in which EPA was leaving the Site at the conclusion of the removal action. In addition to describing the work performed and the types of data available, the OSC identified locations of the soil sampling activities and noted that EPA was still awaiting determination from the EPA scientist concerning recommendations as to possible soil action.

On November 22, 2005 a site tour was conducted by EPA for the Assistant Building Inspector, Town of Wallkill. EPA informed him that the water lines have been purged using air, and that EPA was discontinuing further site security.

In November 2005, the OSC reviewed the soil data with members of EPA's Environmental Response Team ("ERT") to determine whether further soil action was warranted for ecological protectiveness. ERT's determination was that the lack of vegetation cover in parts of the site was attributable to the low pH and high chloride content in the soils. ERT recommended that although no soil removal was necessary, that it would be advisable to elevate the soil pH to near neutral and add organic material to the soil to enhance vegetative growth. The OSC agreed with this recommendation.

As part of its activities to demobilize from the Site, the OSC, after consultation with the trustee in bankruptcy and counsel for the trustee, met on-Site on December 14th, 2006 with a licensed sprinkler system contractor in order to attempt to drain the sprinkler system lines and prevent the freezing and possible bursting of the lines, since the building would be unheated after EPA's demobilization. The contractor was unable to close the on-Site valve to the sprinkler system which appeared to be frozen in the on position. Upon the contractor's recommendation, EPA contacted the Wallkill Water Company which sent a technician who turned off the valve at the street (Enterprise Place). The contractor estimated that the sprinkler system lines likely contained more than 1,000 gallons of water but that there was no practical way to empty those lines at that time.

Next Steps

EPA plans to return to the Site starting in late January 2006 to begin to buffer the soils and add organics in areas of the Site that may have been impacted by acidic or other waste streams, and that exhibit stressed vegetation. EPA anticipates that this final phase of the removal action will address approximaltely 65,000 square feet of soils, will take several weeks, and will be completed by February 2006.