

**United States Environmental Protection Agency
Region II
POLLUTION REPORT**

Date: Monday, August 6, 2007

From: Jack D. Harmon

To: Jack Harmon, USEPA, 2ERRD-RAB Mike Basile, USEPA Region II

Subject: Buckbee-Mears
30 Kellogg Road, Cortland, NY
Latitude: 42.5920000
Longitude: -76.1581800

POLREP No.:	8	Site #:	YH
Reporting Period:	06/16/07 to 08/03/07	D.O. #:	EP-W-04-054-044
Start Date:	1/10/2007	Response Authority:	CERCLA
Mob Date:		Response Type:	Time-Critical
Demob Date:		NPL Status:	Non NPL
Completion Date:		Incident Category:	Removal Action
CERCLIS ID #:	NYN000205908	Contract #	EP-W-06-072
RCRIS ID #:			

Site Description

The facility is located at 30 Kellogg Road, City of Cortland, Cortland County, New York, 13045. The property is approximately 50 acres in size and contains a large main production building, interconnected with several smaller production buildings, an office building and several support buildings, including a flammable storage building and a hazardous waste storage garage. The size of the facility

buildings are estimated at 367,000 ft².

The Buckbee-Mears facility was purchased by International Electron Devices (IED) on October 26, 2004. IED operated the facility until May, 2005, when they closed due to a lack of funding. A large number of the bulk chemicals used in production and the chemical wastes from past operations were abandoned on Site. These materials included: strong acids and caustics in large tanks, drums, process piping and numerous small containers throughout the facility. Approximately 7 cylinders of chlorine gas were also abandoned on Site.

During the summer of 2006, the Cortland Police Department responded to a report of vandalism and became concerned when they discovered the large amount of chemicals which had been abandoned at the Site. The Cortland Police subsequently notified the New York State Department of Environmental Conservation (NYSDEC) of their findings. On July 27, 2006, representatives from the NYSDEC, the Cortland Police and Fire Departments and the Environmental Protection Agency (EPA) conducted a Site visit. The visit confirmed the presence of numerous hazardous substances in drums, tanks and cylinders throughout the facility. The potential for a chemical release was deemed serious because the facility was idle with no security and all utilities had been terminated. On August 1, 2006, the NYSDEC formally requested the EPA to conduct a removal action under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) at this Site.

Negotiations with the PRP to perform the required clean up actions resulted in EPA issuing an Administrative Order on September 29, 2006. The PRP initially complied with the Order, but ceased correspondence with EPA in early November, 2006. Following several acts of vandalism at the facility, EPA initiated a Removal Action on January 10, 2007.

Current Activities

EPA initiated a removal action at this Site on January 10, 2007. Site continues doing non-work hours. This period, ERRS concentrated their efforts on pumping out water and sludge from sumps and discharging this collected material to the City of Cortland POTW.

Site security was in place during all non working hours this period. No incidents were reported. One hallway where mold is multiplying was secured and entry prohibited. The two areas that have been damaged by water leaking from the roof continue to be off-limits.

During the week of June 18, 2007, the City of Cortland POTW approved the discharge of accumulated waste water that is being stored within the on-site water treatment clarifiers. Also during the week,, Clean Harbors began vacuuming sludge from sumps in Building 5 with a total of 1,850 gallons being vacuumed. After vacuuming, the sludge is transferred into roll-offs where it'll be solidified.

During the week of June 25, 2007, after a plug was removed from the sewer line, discharging of waste water to the POTW was initiated. The City of Cortland POTW approved 10,000 gpd as the rate of discharge. Clean Harbors continued to vacuum sludge from sumps in Building 5 with a total of 8,800 gallons being vacuumed.

During the week of July 2, 2007, the ERRS contractor continued discharging accumulated waste water in the site's clarifier to the POTW. A total of 80,000 gallons were discharged during the week. Clean Harbors continues to vacuum sludge from sumps in Building 1 with a total of approximately 14,000 gallons being vacuumed.

During the week of July 9, 2007, the ERRS contractor completed discharging accumulated water in the site's clarifier to the POTW. 51,500 gallons were discharge during the reporting period with a total of 131,500 gallons being discharged to date. Pumping 8,000 gallons of water from sumps in building four was also accomplished. In addition 80 empty 55-gallon drums were crushed and placed into a roll-off.

During the week of July 16, 2007, the ERRS contractor concentrated their efforts on pumping water/sludge from sumps in building two and sludge from sumps in building five. A total of 14,000 gallons was pumped and discharged into the on-site clarifier. The office trailers were connected to a public source of power and the generator was returned to the vendor. ERRS drained approximately 270 gallons of chromic acid from a tank inside Building 5 into a portable tank for disposal. The room containing the tank was heavily stained and the area was deconned before the transfer was completed.

During the week of July 23, 2007, the ERRS contractor continued their efforts on pumping sludge from sumps in building two and four and water from a sump in building five. A total of 15,000 gallons was pumped and discharged into the on-site clarifier. Accumulated sludge in one of the clarifiers was agitated and sampled in preparation for discharge to the POTW.

During the week of July 30, 2007, the ERRS contractor continued their efforts on pumping water/sludge from sumps in building five. A total of 7,000 gallons was pumped and discharged into the on-site clarifier. Sample results from the clarifier were received and forwarded to the POTW in preparation for discharge. In addition, the ERRS contractor initiated the cutting and removal of process line piping. In total, 1,735 linear feet of piping, containing non-hazardous materials, were addressed.

An additional \$241,000 was committed that brings the total for the ERRS contractor to \$891,000. The \$126,150 for contingency has been allocated to the RST contractor.

The RST contractor continued to perform air monitoring prior to and during site operations.

Planned Removal Actions

The winter of 2006-2007 was the first winter season without maintenance oversight and as a result, building conditions have deteriorated brought on by the winter weather, i.e., extensive roof leaks, burst water and chemical feed pipes and significant mold growth. Leaking acid feed pipes will only accelerate the deterioration process. These worsening conditions significantly change the level of clean-up the EPA must complete. In addition, the information that has been offered by a former maintenance person at the facility has been inaccurate which has resulted in much more contamination remaining in the process piping than originally thought.

An action memorandum that requests a ceiling increase, a change in scope and exemptions from the 12-month and \$2 million statutes has been drafted and is currently in review prior to concurrence.

Next Steps

Until the approval of a new action memorandum is received, EPA will continue Site security during all non working hours. ERRS will pursue disposal and recycling options for the waste material remaining on Site. RST will continue to perform air monitoring and photo-document field activities.

After approval of a new action memorandum is received, field activities will be increased to address the extensive contamination within the buildings' interior. In association with this, a site assessment by the RST contractor will identify the extent of contamination throughout the interior of the buildings.

Key Issues

Since there has been a worsening condition of the buildings, EPA will increase its scope of work to include removal and disposal of process piping, cleaning and dismantling of tanks, decontamination of building interiors, salvaging equipment, and may include limited demolition. A draft change in scope, ceiling increase and exemptions from the \$2 million and 12-month statutes was developed and is under review in preparation for concurrence.

Disposition of Wastes

Waste Stream	Quantity	Manifest #	Disposal Facility
Waste water	131,500 gals	n/a	Cortland POTW

response.epa.gov/BuckbeeMears