

EXECUTIVE SUMMARY

SITE: Catskill Chrome Plating

LOCATION: Catskill, Greene County, New York

PROJECT DATES: September 26, 1994 - December 9, 1994

INCIDENT DESCRIPTION: Catskill Chrome Plating, Inc., is a former electroplating facility located at 370 W. Bridge Street in the Village of Catskill, Greene County, New York.

On January 13, 1994, an air release of caustic vapors occurred; the owner was reportedly evaporating liquids in an effort to consolidate remaining solutions in the plating baths. As the vapor was exiting the exhaust fans, it condensed, due to the cold weather and settled on the snow, causing a yellow discoloration. The New York State Department of Environmental Conservation (NYSDEC) responded to the site and ordered the owner to collect the contaminated snow in drums. During the week of March 7, 1994, a NYSDEC official noted that one of the drums in which the contaminated snow had been placed was leaking.

On March 9, 1994, the NYSDEC requested that the Removal and Emergency Preparedness Programs (REPP) conduct an evaluation of the facility for Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Removal Action consideration.

ACTIONS: On March 23, 1994, an EPA On-Scene Coordinator (OSC) and members of the Technical Assistance Team (TAT) conducted a site evaluation of the facility. Based on the obtained information, a CERCLA Removal Action was warranted.

OHM Remediation Corp., the Emergency Response Cleanup Services (ERCS) contractor, mobilized on September 26, 1994. The vats and drums in the facility were sampled for compatibility and disposal analyses were conducted.

Hazardous and non-hazardous debris were segregated and staged in the building in preparation for removal and subsequent disposal. Disposal of all wastes was completed on December 9, 1994.

Jack Harmon, OSC
U.S. EPA, Region II
Edison, NJ

I. SUMMARY OF EVENTS

A. Site Conditions and Background

1. Initial Situation

Catskill Chrome Plating, Inc. is an abandoned electroplating facility. The facility is comprised of a one story building, the electroplating operation building, and a two story attached office building. Large quantities of hazardous electroplating solutions were found in deteriorating vats and drums throughout the plant. Approximately 11,532 gallons of waste liquids were in the vats. A release of a vapor cloud which, due to the cold weather, condensed and contaminated the snow prompted the NYSDEC to investigate the facility. NYSDEC referred the facility to United States Environmental Protection Agency (USEPA) for site evaluation and CERCLA Removal Action consideration. (For a site location and site map, refer to Figures 1 and 2.)

2. Location of Hazardous Substances

Abandoned vats and drums of electroplating chemicals were located throughout the electroplating building. Additionally, there were several dozen containers, including one-gallon, and smaller plastic containers, and 25-gallon carboys stored throughout the building.

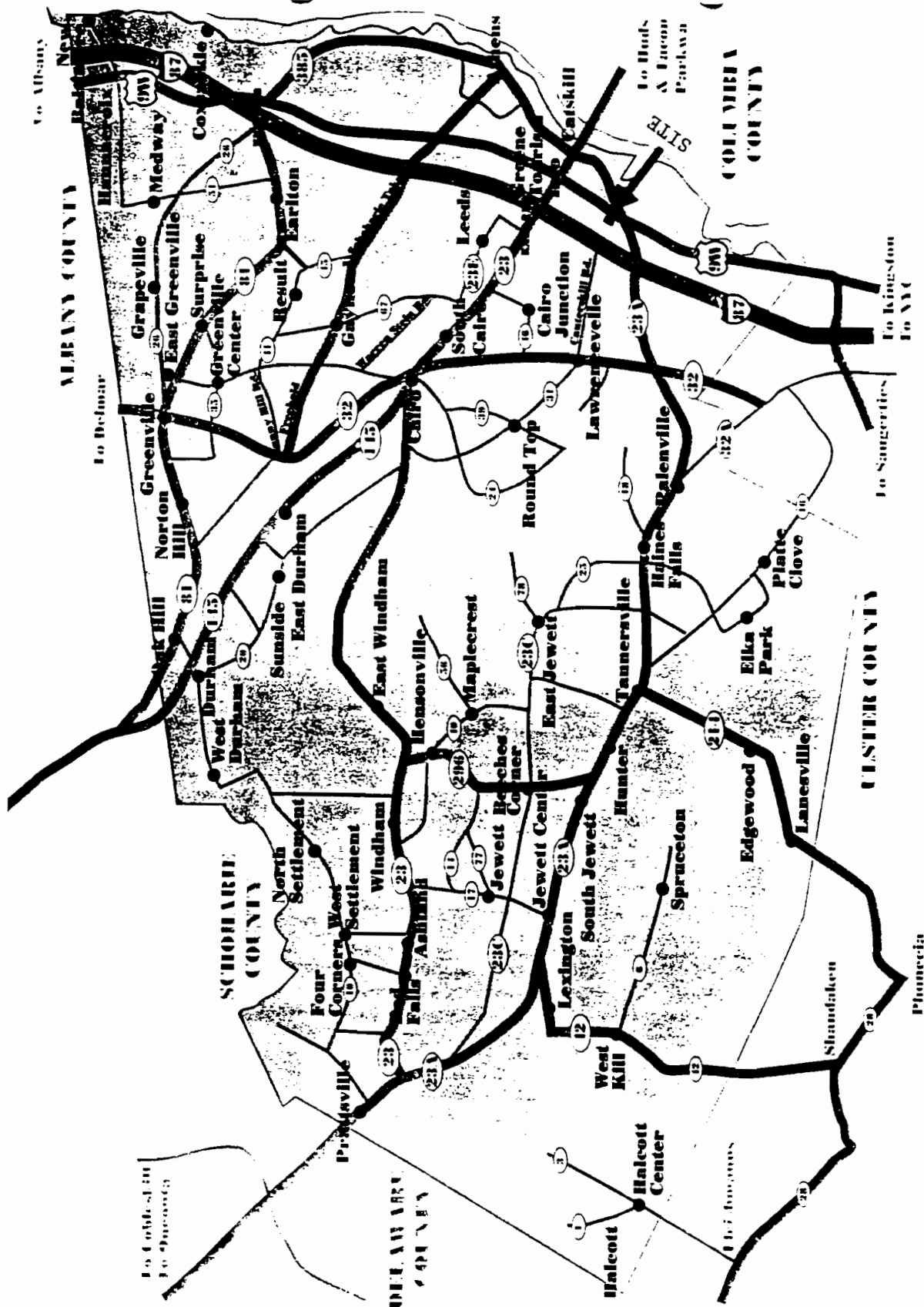
3. Cause of Release or Discharge

Reportedly, in an attempt to reduce the waste, a release occurred while the owner was evaporating liquids. Once the vapors exited from the building, they condensed and contaminated the snow outside. The release was investigated by the NYSDEC.

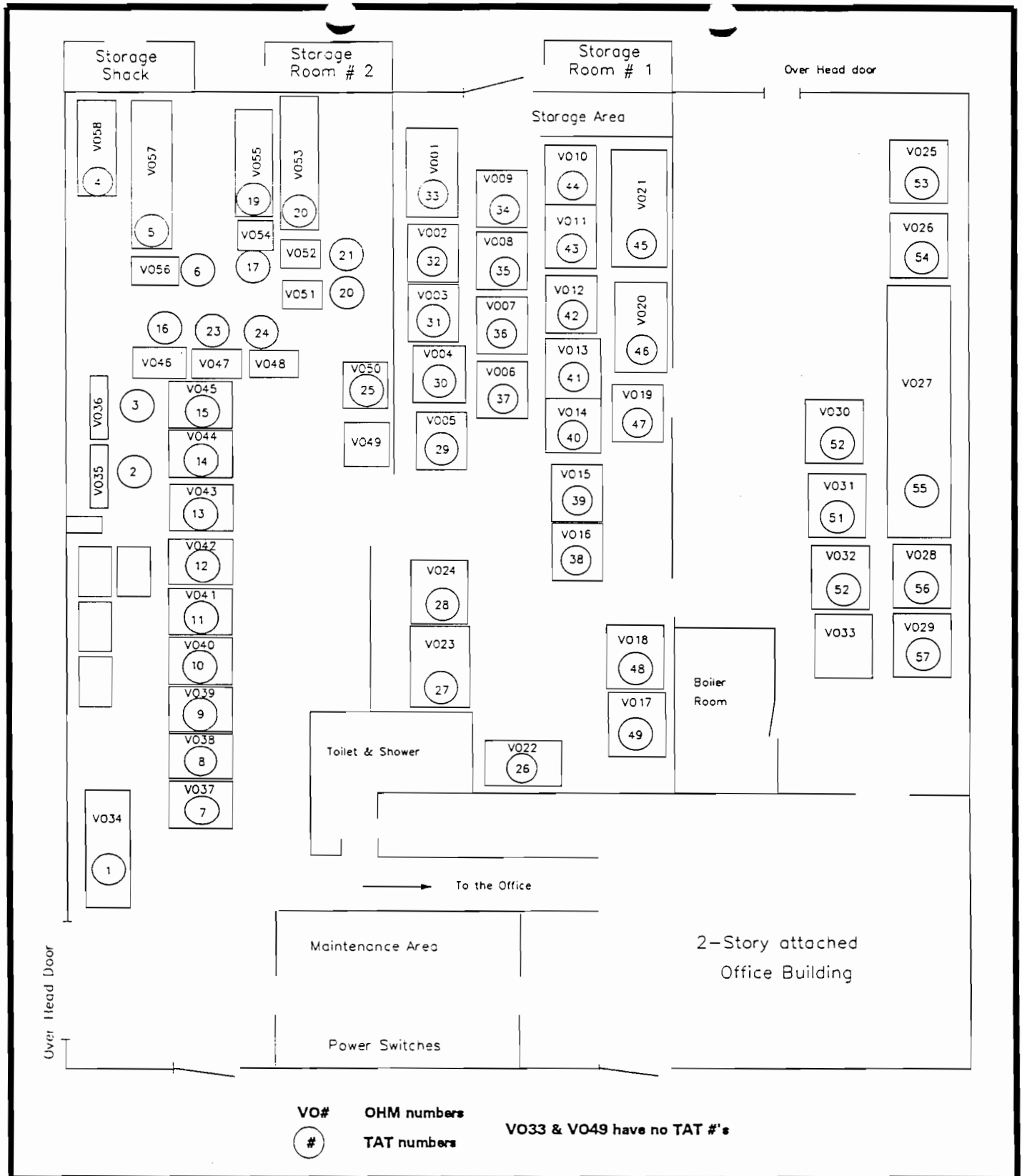
During the removal action, releases and discharges of plating solutions from sloppy operational practices were evident.

4. Efforts to Obtain Response from Responsible Parties (RP)

Attempts at contacting the responsible parties (the owners), resulted in noncommittal responses.



<p>WESTON MANAGING</p> <p>DESIGN/CONSULTANTS</p> <p>IN ASSOCIATION WITH FOSTER WHEELER CORP., C.C. JOHNSON & MALHOTRA, P.C., RESOURCE APPLICATIONS, INC. AND R.E. SARRIERA ASSOCIATES</p>	<p>Roy F. Weston, Inc. MAJOR PROGRAMS DIVISION</p>	<p>EPA PM JACK HARMON</p> <p>TAT PM ADLY MICHAEL</p>	<p>SITE LOCATION Figure 1</p> <p>CATSKILL CHROME PLATING SITE</p>
--	--	--	---



WESTON
 MANAGERS DESIGNERS/CONSULTANTS

Ray F. Weston, Inc.
 MAJOR PROGRAMS DIVISION

IN ASSOCIATION WITH FOSTER WHEELER CORP.,
 C.C JOHNSON & MALHOTRA, P.C., RESOURCE
 APPLICATIONS, INC. AND R.E. SARRIERA ASSOCIATES

EPA PM
 JACK HARMON

TAT PM
 ADLY MICHAEL

Site Map
Figure 2

CATSKILL CHROME
 PLATING

B. Organization of Response

Table I

Agencies or Parties Involved	Contact	Description of Duties
USEPA - Region II Removal Action Branch 2890 Woodbridge Ave. Edison, NJ 08837 (908) 906-6841	Jack D. Harmon, OSC	Responsible for oversight of the removal action.
USEPA- Technical Assistance Team Roy F. Weston, Inc. 1090 King George Post Rd. Suite 201 Edison, NJ 08837 (908) 225-6116	Adly A. Michael, TAT Project Manager	Provided EPA with technical assistance, administrative support, coordination of sampling activities, site safety, photo and site documentation and report preparation .
OHM Remediation Corporation 200 Horizon center Blvd. Trenton, NJ 08691 1904 (609) 584-8900	Ronald Chasney, ERCS Response Manager	Provided cleanup services for implementation of the removal action.

C. Injury/Possible Injury to Natural Resources

1. **Content and Time of Notice to Natural Resource Trustees**
N/A
2. **Trustee Damage Assessment and Restoration Activities**
N/A

D. Chronological Narrative of Response Actions

1. **Threat Abatement Actions Taken**

On March 9, 1994, the REPP received a request from the NYSDEC to evaluate the Catskill Chrome Plating site for CERCLA removal action consideration.

On March 23, 1994, the USEPA and the TAT contractor conducted a Removal Site Evaluation (RSE) and sampled 57 plating vats; a total of 57 liquid and 13 sludge samples were collected and analyzed for Target Analyte List (TAL) metals, cyanide and pH analyses. The analytical results indicated the existence of CERCLA designated hazardous substances as listed in 40 CFR Table 302.4.

On September 16, 1994, the EPA OSC met with the response manager (RM) from the ERCS contractor to discuss personnel and equipment requirements for the proposed removal action. In addition, information was obtained for the development of a site-specific health and safety plan and work plan.

On September 26, 1994, the ERCS contractor and TAT mobilized and commenced site preparation for removal activities.

On September 27, 1994, the ERCS contractor began sampling all vats and drums containing material and conducted hazard characterization. By September 29, 1994, all sampling and hazard categorization was completed and the results were compiled in preparation for placing the wastes into compatible wastestreams. On September 30, 1994, the ERCS contractor's transportation and disposal (T&D) coordinator was on site to review the hazard categorization results, as well as RSE sampling data.

Bulking schemes were developed and compatibility testing of the wastestream design was completed on October 3, 1994. The compatibility testing resulted in three main wastestreams and ten other individual wastestreams that were not compatible with any other. The three main waste streams were transported by tank trailers on November 4, 7, and 8, 1994.

All wooden platforms running between the vats, and cinder blocks underneath the vats were found to be contaminated. All platforms were demolished and the cinder blocks were crushed and loaded into two 40-cubic yard capacity roll-offs. These roll-offs were shipped off site for disposal to a RCRA-approved facility on December 9, 1994.

The EPA OSC, TAT, and the ERCS contractor's personnel demobilized on November 9, 1994.

2. Treatment/Disposal/Alternative Technology Approaches Pursued and Followed

The various waste streams were either incinerated, chemically treated, or landfilled at RCRA approved facilities. On-site stabilization was performed on November 7, 1994, to solidify an aqueous waste by mixing it with cement; the resulting cement mixture was transported for disposal to an approved landfill.

Table II - Material Disposition

Material	Amount	Method	Location
Inorganic Plating Liquids	330 Gal	Incineration	Ensco Environmental Services, Dalton, GA
Caustic/Alkali Liquids + Cyanide	2,280 Gal	Wastewater Treatment	Ensco Environmental Services, Dalton, GA Heritage Environmental Services Indianapolis, IN
Inorganic Solids + Cyanide	12,000 lbs	Incineration	Ensco Environmental Services, Dalton, GA
Waste Sodium Cyanide Solid	100 lbs	Treatment	Ensco Environmental Services, Dalton, GA
Waste Poisonous Liquid + Cyanide	220 Gal	Wastewater Treatment	Ensco Environmental Services, Dalton, GA
Waste Oxidizer Liquid + Cyanide	220 Gal	Wastewater Treatment	Ensco Environmental Services, Dalton, GA
Waste Zinc Cyanide Liquid	16 Gal	Wastewater Treatment	Ensco Environmental Services, Dalton, GA
Waste Corrosive Solid + Cyanide	1,955 lbs	Treatment	Ensco Environmental Services, Dalton, GA
Various Waste Labpacks	1,086 lbs	Incineration/ Treatment	Ensco Environmental Services, Dalton, GA
Waste Corrosive Liquid	1,650 Gal	Incineration	Ensco Environmental Services, Dalton, GA
Waste Hydrogen Peroxide Liquid	16 Gal	Treatment	Ensco Environmental Services, Dalton, GA
Hazardous Waste Liquid	6,800 Gal	Wastewater Treatment	Clean Harbor of Connecticut Bristol, CT
Hazardous Waste Solid	80 cy	Landfill	Chem Waste Adams Center, IN

3. Public Information and Community Relations Activities Taken

An Administrative Record was prepared and placed in the Catskill Public Library as an information document for the public on 16 December, 1994.

E. Resources Committed

A summary of estimated costs for this action are presented below.

Extramural Costs:	
Total Removal Contractor Costs	\$ 275,000
Total TAT Costs	\$ 22,815
EXTRAMURAL SUBTOTAL	\$ 297,815
INTRAMURAL COSTS:	
EPA Direct and Indirect Costs	\$ 24,950
INTRAMURAL SUBTOTAL	\$ 24,950
ESTIMATED TOTAL PROJECT COSTS	\$ 322,765
PROJECT CEILING	\$ 670,000

II. EFFECTIVENESS OF REMOVAL ACTIONS

A. Actions Taken By Potentially Responsible Parties (PRPs)

The PRP for this site was not involved in the removal action.

B. Actions Taken By State and Local Forces

The NYSDEC provided historical information concerning the site prior to the site assessment. A property boundary survey was provided by the Department of Real Property of the NYSDEC.

C. Actions Taken By Federal Agencies and Special Teams

No federal agency, or special teams, other than EPA, were involved in the removal action.

D. Actions Taken By Contractors, Private Groups, and Volunteers

The EPA ERCS contractor, OHM Remediation Corporation conducted the cleanup of the site. In addition to performing waste stream bulking and drum sampling, OHM Remediation Corporation coordinated the transportation and disposal of the hazardous materials. The EPA TAT contractor, Roy F. Weston, Inc., provided technical assistance during the preliminary assessment. Additionally, TAT provided documentation of on-site activities, air monitoring and health and safety monitoring throughout the removal action. Private groups and volunteers did not participate in any aspect of this removal action.

III. DIFFICULTIES ENCOUNTERED

A. Items that Affected the Response

No major difficulties were encountered during this Removal Action.

B. Issues of Intergovernmental Coordination

Intergovernmental coordination efforts between Federal, State, and local parties were successful for this Removal Action.

C. Difficulties Interpreting, Complying With, or Implementing Polices and Regulations

No difficulties in interpreting, complying with or implementing policies, and regulations were encountered during this Removal Action.

IV. RECOMMENDATIONS

A. Means to Prevent a Recurrence of the Discharge or Release

There are no recommendation other than frequent auditing.

B. Means to Improve Response Actions

There are no recommendations to improve response action at this site.

C. Proposals for Changes in Regulations and Response Plans

There are no proposals for change in regulations and response plans as it pertains to this site.

ATTACHMENT
LIST OF SUPPLEMENTAL DOCUMENTS

LIST OF SUPPLEMENTAL DOCUMENTS

The following list contains titles of additional reports and documents concerning the Catskill Chrome Plating site Removal Action.

Contact Jack Harmon, On-Scene Coordinator for the Catskill Chrome Plating site at (908) 321-6666, to request access to these supplemental documents.

DOCUMENT
General Site Safety Plan Action Memorandum Pollution Reports Disposal Sampling Plan
MISCELLANEOUS DOCUMENTS
Air Monitoring Logs Analytical Results Chain of Custody Daily Work Orders Hazardous Waste Manifests Hot Zone Entry/Exit Logs Site Entry Logs 1900-55 ERCS Forms

H-

FEDERAL ON-SCENE COORDINATOR'S REPORT

**CATSKILL CHROME PLATING SITE
CATSKILL, GREENE COUNTY, NEW YORK**

Site Identification Number: DJ

NPL Status: NON-NPL

September 26, 1994 - December 9, 1994

Prepared for:

U.S. Environmental Protection Agency
Region II
Edison, New Jersey 08837

Prepared by:

Region II Technical Assistance Team
Roy F. Weston, Inc.
Federal Programs Division
Edison, New Jersey 08837

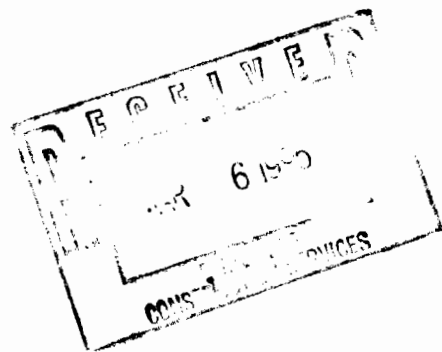


TABLE OF CONTENTS
(Continued)

	<u>Page</u>
III. DIFFICULTIES ENCOUNTERED	8
A. <u>Items that Affected the Response</u>	8
B. <u>Issues of Intergovernmental Coordination</u>	8
C. <u>Difficulties Interpreting, Complying With, or Implementing Polices and Regulations</u>	8
IV. RECOMMENDATIONS	8
A. <u>Means to Prevent a Recurrence of the Discharge or Release</u>	8
B. <u>Means to Improve Response Actions</u>	9
C. <u>Proposals for Changes in Regulations and Response Plans</u>	9

LIST OF FIGURES

		<u>Page</u>
Figure 1	Site Location	2
Figure 2	Site Map	3

LIST OF TABLES

Table I	Organization of Response	4
Table II	Material Disposition	6

EXECUTIVE SUMMARY

SITE: Catskill Chrome Plating

LOCATION: Catskill, Greene County, New York

PROJECT DATES: September 26, 1994 - December 9, 1994

INCIDENT DESCRIPTION: Catskill Chrome Plating, Inc., is a former electroplating facility located at 370 W. Bridge Street in the Village of Catskill, Greene County, New York.

On January 13, 1994, an air release of caustic vapors occurred; the owner was reportedly evaporating liquids in an effort to consolidate remaining solutions in the plating baths. As the vapor was exiting the exhaust fans, it condensed, due to the cold weather and settled on the snow, causing a yellow discoloration. The New York State Department of Environmental Conservation (NYSDEC) responded to the site and ordered the owner to collect the contaminated snow in drums. During the week of March 7, 1994, a NYSDEC official noted that one of the drums in which the contaminated snow had been placed was leaking.

On March 9, 1994, the NYSDEC requested that the Removal and Emergency Preparedness Programs (REPP) conduct an evaluation of the facility for Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Removal Action consideration.

ACTIONS: On March 23, 1994, an EPA On-Scene Coordinator (OSC) and members of the Technical Assistance Team (TAT) conducted a site evaluation of the facility. Based on the obtained information, a CERCLA Removal Action was warranted.

OHM Remediation Corp., the Emergency Response Cleanup Services (ERCS) contractor, mobilized on September 26, 1994. The vats and drums in the facility were sampled for compatibility for disposal analyses were conducted.

Hazardous and non-hazardous debris were segregated and staged in the building in preparation for removal and subsequent disposal. Disposal of all wastes was completed on December 9, 1994.

Jack Harmon, OSC
U.S. EPA, Region II
Edison, NJ