

November 2003



Supplement to Site Investigation  
Report-Volume I  
EPA Pollution Reports

Environmental Restoration Project  
Clean Water/Clean Air Bond Act of  
1996

Independent Leather  
321-333 South Main Street  
City of Gloversville  
Fulton County, New York

*Prepared for:*

**CITY OF GLOVERSVILLE**  
CITY HALL  
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Gloversville, New York 12078

*Prepared by:*

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ENVIRONMENTAL RESTORATION PROJECT  
SUPPLEMENT TO SITE INVESTIGATION REPORT  
VOLUME I - EPA POLLUTION REPORTS  
INDEPENDENT LEATHER  
321-333 SOUTH MAIN STREET  
GLOVERSVILLE, NEW YORK

DOCUMENT OVERVIEW

This volume presents the Pollution Reports prepared by EPA for the CERCLA Emergency Removal Action. During the time C.T. Male was completing the site investigation at the project site, EPA was concurrently conducting a CERCLA Emergency Removal Action. The removal action was deemed necessary by the EPA as there was a threat that abandoned drums and other containers of chemicals in a defunct tannery could be released into the environment if the building collapsed. EPA, specifically Mr. Paul Kahn (on-scene coordinator), prepared the pollution reports generally on a weekly or as needed basis to detail current site information (site description and description of threat), response information (current situation, actions taken, key issues, and next steps), cost information and disposition of the waste.

This document presents the EPA Pollution Reports in chronological order. The table of contents lists each Pollution Report number and the associated date it was prepared by EPA. The pages refer to the total number of pages within that Pollution Report. The content of the EPA reports are summarized and discussed within the appropriate sections of the Draft Site Investigation Report. It should be noted that there are duplicate Pollution Report numbers.

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- AUGUST 1, 2002 EARTH TECH MEMO 1

C.T. MALE ASSOCIATES, P.C.

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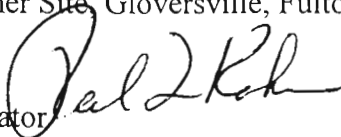
**APRIL 17, 2002 EPA POLLUTION REPORT NO. 1**

U. S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION REPORT

DATE: 4/17/01

SUBJECT: Independent Leather Site, Gloversville, Fulton County, NY

FROM: Paul L. Kahn  
On-Scene Coordinator  
Response and Prevention Branch



TO: B. Sprague, 2 ERRD-RPB  
J. LaPadula, 2ERRD-NYRB  
P. Simon, 2ORC-NYCSFB  
R. Byrnes, 2OIG  
C. Kelley, 2RST  
Chf. M. Shafer, GFD  
J. Higgins, 2ERRD-RPB  
M. H. Cervantes-Gross, 2CD  
R. Cahill, 2CD-PAT  
J. Daloia, 2RPB-ER  
M. McClean, NYSDEC R-5  
R. Ellis, Dir. GDPW

**POLREP No.:** One (1)

**I. BACKGROUND:**

SITE NO.:	QW
Delivery Order No:	040
Response Authority:	CERCLA
NPL Status:	Non-NPL
Action Memo Approval Date	N/A
Start Date:	4/5/01
Mobilization Date :	4/6/01
Demobilization Date:	4/10/01
Completion Date:	TBD

**II. SITE INFORMATION:**

**A. Incident Category:** CERCLA Emergency removal action

**1. Site Description**

The Site consists of a defunct 4-story leather tannery and various out-buildings, located in mixed residential/commercial area. Tannery was abandoned 7 years ago with hundreds of drums of chemicals left inside, including corrosives, metallic pigments, resins, acids, laboratory-type chemicals and water-reactive solids and chromium solutions. City officials and representatives from the NY State Department of Environmental Conservation (NYSDEC) requested that EPA conduct an assessment of the tannery to determine if it was eligible for a CERCLA removal action. A preliminary assessment was conducted in March, 2001 and although the Site was

believed to be eligible, before EPA could mobilize a removal crew to the Site, heavy snowfall in the area where Site is located resulted in a partial collapse of roof and the buckling of outer wall. City officials were afraid that strain on intact floors and walls might result in total collapse of roof into basement area where abandoned chemicals were stored, resulting in a release of chemicals and a possible fire situation. EPA assistance was requested to address this threat.

## **2. Description of Threat**

Threat was from abandoned drums and other containers of chemicals in the basement of defunct tannery being involved in a collapse of the building in which they were stored, and a possible resulting release to the environment or from a fire.

## **III. RESPONSE INFORMATION:**

### **A. Current Situation**

More than 200 containers of chemicals moved from the partially collapsed side of the building to a more secure location in the building approximately 100 yards away. Deteriorated containers were overpacked or bulked into sound containers, staged on sound wooden pallets, and moved by forklift to more stable part of basement. If further collapse occurs no chemicals will be involved in the event.

### **B. Actions Taken**

While moving chemical containers an open 30-gallon drum of sodium hydrosulfite (hydro), a water-reactive solid was discovered. Since this material could ignite spontaneously in high humidity, the container was covered, overpacked and segregated. The OSC contacted the manufacturer through CHEMTREC, and arrangements were made for the manufacturer to have a disposal company remove this material from the site and transport it for disposal. Prior to the arrival of this truck, an additional gallon can of hydro was discovered and this was placed in the overpack drum with the other hydro.

Prior to demobing the Site, Gloversville Fire Chief and Deputy Building Inspector were given a briefing and tour of the new drum staging area.

### **C. Key Issues**

The two key issues were 1) the possibility that the building was too unstable to safely put a cleanup crew into the basement area to work, and 2) the possibility of initiating further collapse of the building if supporting columns in basement were accidentally damaged by workers moving drums with a forklift.



ERRS brought a structural engineer to the Site, and he inspected the collapsed portion of the building and supporting columns in the basement. Engineer opined that there was a small chance that additional collapse of damaged area would occur within the 3 or 4 days that was thought necessary to complete the work. There was some short term concern about one column in the basement that had been actually partially dislodged from its support footing, and the overhead roof was observed to have dropped approximately 4 inches as a result. Immediate recommendation was to install screw jacks on either side of damaged column to provide supplemental, temporary support for the cross beam. This was done immediately. Further recommendation was to have a guide accompany forklift driver to assist in negotiating movement around other supporting columns, this was initiated as movement of drums began.

#### **D. Next Steps**

Since this Site was deemed eligible for a CERCLA removal action immediately prior to the roof collapse, the next step will be to write an action memo for approval and additional funding so the Site can be cleaned up.

#### **IV. COST INFORMATION**

The following table presents information on estimated costs for the removal action:

	<u>Ceiling</u>	<u>Costs to Date</u>	<u>Remaining Project Funds</u>
ERRS	\$50,000	\$33,000	\$ n/a
RST	\$ n/a	\$ n/a	\$ n/a
EPA	-----	-----	-----
TOTAL	\$50,000	\$33,000	\$ n/a

**Percent of Ceiling Utilized to Date: 64%**

**Note: The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The costs provided in this report are an estimate and do not reflect a monetary figure that EPA may include in any claims for cost recovery.**

#### **V. DISPOSITION OF WASTES:**

Drum of hydro shipped to haz-waste broker for subsequent disposal. Supplier signed manifest as generator.

**Final POLREP \_\_\_\_\_ Further POLREPS Forthcoming XXX**



**JUNE 11, 2001 EPA POLLUTION REPORT NO. 2**

U. S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION REPORT

DATE: 6/11/01

SUBJECT: Independent Leather Site, Gloversville, Fulton County, NY

FROM: Paul L. Kahn  
On-Scene Coordinator  
Response and Prevention Branch

TO:	B. Sprague, 2 ERRD-RPB	J. Higgins, 2ERRD-RPB
	J. LaPadula, 2ERRD-NYRB	M. H. Cervantes-Gross, 2CD
	P. Simon, 2ORC-NYCSFB	R. Cahill, 2CD-PAT
	R. Byrnes, 2OIG	J. Daloia, 2RPB-ER
	C. Kelley, 2RST	M. McClean, NYSDEC R-5
	Chf. M. Shafer, GFD	R. Ellis, Dir. GDPW ✓

**POLREP No.:** Two (2)

**I. BACKGROUND:**

SITE NO:	QW
Delivery Order No:	040
Response Authority:	CERCLA
NPL Status:	Non-NPL
Action Memo Approval Date	5/16/01
Start Date:	4/5/01
Mobilization Date :	4/6/01
Demobilization Date:	4/10/01
Remobilization Date	6/5/01
Completion Date:	TBD

**II. SITE INFORMATION:**

**A. Incident Category: CERCLA Emergency removal action**

**1. Site Description**

The Site consists of a defunct 4-story leather tannery and various out-buildings, located in mixed residential/commercial area. Tannery was abandoned 7 years ago with hundreds of drums of chemicals left inside, including corrosives, metallic pigments, resins, acids, laboratory-type chemicals and water-reactive solids, chromium solutions, and bio waste consisting of animal hair, skin fleshings, and small body parts..

In April 2001, heavy snowfall resulted in partial collapse of roof and buckling of outer wall, threatening collapse of roof into basement area containing hundreds of chemical containers. EPA mobilized removal crew to site for 6 days and restaged chemicals to a more secure area of building.

## **2. Description of Threat**

Primary threat is from fire or public access to abandoned drums, other chemical containers, and biological waste in basement and other areas of defunct tannery.

## **III. RESPONSE INFORMATION:**

### **A. Current Situation**

More than 200 containers of chemicals moved from the partially collapsed side of the building to a more secure location in the building approximately 100 yards away. Deteriorated containers were overpacked or bulked into sound containers, staged on wooden pallets, and moved by forklift to more stable part of basement.

Partial crew remobed to site on 6/5/01 to prepare site for completion of removal action. Office trailer set up, electricity and phones operational. Brush and trees cleared from site to improve visibility. Further site assessment identified additional areas of bio-/chemical waste, including one UST, a crate of asbestos containing insulation, two bricked bunkers containing bulk crystalline material, additional drums and bags of chemicals, more animal skins, and a fourth holding pond in the WWTP area.

Full crew mobed to site on 6/11/01 to complete removal action.

### **B. Actions Taken**

A 30-gallon drum of sodium hydrosulfite (hydro), a water-reactive solid that could ignite spontaneously in high humidity, was discovered. OSC contacted the manufacturer through CHEMTREC, and material was disposed of by original supplier at no cost to EPA.

ERRS brought licensed PE to site to evaluate condition of wood bridge over Cayadutta Creek to second process building where considerable amounts of bio and chemical wastes are located.. Engineer determined supporting beams are sound, and recommended that the decking be replaced in order for bridge to accommodate weight of Bobcat.

ERRS set up hi-vis fencing to delineate walkways, established evac, routes, installed exit signs in hot zone, and set up emergency shower.

RST set up admin file at Gloversville Public Library; public notice sent to local newspaper and will be published for three days.

Health and Safety Plan approved, read, and signed by all members of crew.

OSC met with principal of local elementary school (pre-K thru 5) and requested his teachers read notice to students warning them to stay away from site, a request to which he readily agreed.

CD completed and released public fact sheet.

ORC working on draft of 104(e) /Notice letter to PRP.

### C. Key Issues

Key issue is the safe handling of bio waste located in both process buildings. CDC is sending two IHS to visit site to evaluate bio waste with respect to possible contagious organisms and potential exposure pathways. CDC will make recommendations as to PPE and handling/packing procedures. ERRS will most likely subcontract removal of biowaste streams to a certified biowaste remediation company.

### D. Next Steps

ERRS will clear areas of basement in Building #1 to make room for restaging chemical containers in other buildings. Hazcating will begin when all chemical containers are consolidated. ERRS/RST will begin sampling electrical transformers for PCBs, sampling liquid and sludge phases of each of four settling ponds in WWTP, and further secure areas where bio waste is located. ERRS will attempt to locate possible second UST.

## IV. COST INFORMATION

The following table presents information on estimated costs for the removal action:

	<u>Ceiling</u>	<u>Costs to Date</u>	<u>Remaining Project Funds</u>
ERRS	\$600,000	\$45,000	\$555,000
RST	---	(\$20,000)*	---
EPA	---	---	---
	<hr/>	<hr/>	<hr/>
<b>TOTAL</b>	<b>\$600,000</b>	<b>\$45,000</b>	<b>\$555,000</b>

**Percent of Ceiling Utilized to Date: 9%**

\*RST costs are level-of-effort and do not actually come out of total project ceiling, and as such RST costs are not deducted from available removal project funds

**Note: The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The costs provided in this report are an estimate and do not reflect a monetary figure that EPA may include in any claims for cost recovery.**

**V. DISPOSITION OF WASTES:**

Drum of sodiumhydrosulfite shipped to haz-waste broker for subsequent disposal. Supplier signed manifest as generator. Disposition of other waste streams TBD.

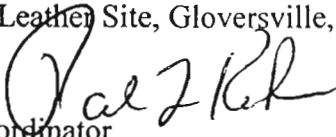
**Final POLREP \_\_\_\_\_ Further POLREPS Forthcoming XXX**

**JUNE 19, 2001 EPA POLLUTION REPORT NO. 3**

U. S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION REPORT

DATE: 6/19/01

SUBJECT: Independent Leather Site, Gloversville, Fulton County, NY

FROM: Paul L. Kahn   
On-Scene Coordinator  
Response and Prevention Branch

TO: B. Sprague, 2 ERRD-RPB J. Higgins, 2ERRD-RPB  
J. LaPadula, 2ERRD-NYRB M. H. Cervantes-Gross, 2CD  
P. Simon, 2ORC-NYCSFB R. Cahill, 2CD-PAT  
R. Byrnes, 2OIG J. Daloia, 2RPB-ER  
C. Kelley, 2RST M. McClean, NYSDEC R-5  
Chf. M. Shafer, GFD R. Ellis, Dir. GDPW

**POLREP No.:** Three (3)

**I. BACKGROUND:**

SITE NO:	QW
Delivery Order No:	040
Response Authority:	CERCLA
NPL Status:	Non-NPL
Action Memo Approval Date	5/16/01
Start Date:	4/5/01
Mobilization Date :	4/6/01
Demobilization Date:	4/10/01
Remobilization Date	6/5/01
Completion Date:	TBD

**II. SITE INFORMATION:**

**A. Incident Category: CERCLA time-critical removal action**

**1. Site Description**

The Site consists of a defunct 4-story leather tannery and various out-buildings, located in mixed residential/commercial area. Tannery was abandoned 7 years ago with hundreds of drums of chemicals left inside, including corrosives, metallic pigments, resins, acids, laboratory-type chemicals and water-reactive solids, chromium solutions, and bio waste consisting of animal hair, skin fleshings, and small body parts..



In April 2001, heavy snowfall resulted in partial collapse of roof and buckling of outer wall, threatening collapse of roof into basement area containing hundreds of chemical containers. EPA mobilized removal crew to site and restaged chemicals to a more secure area of building .

## **2. Description of Threat**

Primary threat is from fire or public access to abandoned drums, other chemical containers, and biological waste in basement and other areas of defunct tannery.

## **III. RESPONSE INFORMATION:**

### **A. Current Situation**

Command post fully operational. Regular site activities underway. Fire Chief advised of current situation and EPA's intention to demolish building; city officials concur and welcome decision.

### **B. Actions Taken**

A 30-gallon drum of sodium hydrosulfite (hydro), a water-reactive solid that could ignite spontaneously in high humidity, was discovered. OSC contacted the manufacturer through CHEMTREC, and material was disposed of by original supplier at no cost to EPA.

ERRS brought licensed PE to site to evaluate condition of main building. Engineer determined supporting beams in basement are too deteriorated to use heavy equipment in their proximity, and the clearance is too close as well. As such, it will be necessary to demolish the entire structure to gain access to basement for removal activities.

Drums of contaminated water transferred to 4,000 gal holding tank.

Access to site limited by hi-vis fencing and warning signs..

Admin file at Gloversville Public Library; public notice sent to local newspaper and will be published for 3 days.

Chemical containers in processing building overpacked and staged for removal as soon as bridge is repaired.

104(e) /Notice letter to PRP circulating for concurrence in ORC.

Second UST located adjacent to first tank.

General Electric Co. contacted regarding the two transformers on site. GE has a commercial removal service and will provide a quote for one-stop shopping that includes removal and disposal of the PCB fluid, decon of the transformer carcass and it's removal to a TOSCA certified storage area. Quote for this service to be submitted to ERRS.

Disposal samples from in-plant drains, basement floor, and wood process equipment sent to lab by courier.

ERRS walked creek bed, removed empty drum, junk objects and debris.

Modification to SOW to include building demolition, outfall excavation, and recontouring terrain submitted to GCMB.

### **C. Key Issues**

Key issue remains the safe handling of bio waste located in both process buildings. CDC is sending two IHs to visit site on 6/25-26 to evaluate bio waste with respect to possible contagious organisms and potential exposure pathways. CDC will make recommendations for PPE and handling/packing procedures, and evaluate biowaste remediation subcontractor's work plan.

Second, but minor issue is the demolition of the main building, which will involve Davis-Bacon Act labor rates. GCMB contacted and provided with labor categories. GCMB will send request to DOL for labor rate determination so bids for the demolition can be solicited.

### **D. Next Steps**

Overpacked chemicals to be restaged outside of main building for ease of sampling and to provide access to other areas of basement.

Bridge decking to be installed week of 6/18.

Chemical containers to be moved from processing building to staging area for sampling.

Asbestos pipe insulation from around site to be collected and staged for on-site treatment.

ERRS mobing chemist to site on 6/21 to begin preparing drums with identifiable contents and lab pack items for disposal.

#### **IV. COST INFORMATION**

The following table presents information on estimated costs for the removal action:

	<u>Ceiling</u>	<u>Costs to Date</u>	<u>Remaining Project Funds</u>
ERRS	\$600,000	\$59,000	\$ 541,000
RST	-----	(\$25,000 )*	-----
EPA	-----	-----	-----
	-----	-----	-----
<b>TOTAL</b>	<b>\$600,000</b>	<b>\$59,000</b>	<b>\$ 541,000</b>

**Percent of Ceiling Utilized to Date: 10%**

\*RST costs are level-of-effort and do not actually come out of total project ceiling, and as such RST costs are not deducted from available removal project funds

**Note: The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The costs provided in this report are an estimate and do not reflect a monetary figure that EPA may include in any claims for cost recovery.**

#### **V. DISPOSITION OF WASTES:**

Disposition of other waste streams TBD

**Final POLREP \_\_\_\_\_ Further POLREPS Forthcoming XXX**

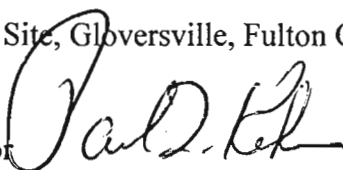
**JUNE 25, 2001 EPA POLLUTION REPORT NO. 4**

U. S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION REPORT

DATE: 6/25/01

SUBJECT: Independent Leather Site, Gloversville, Fulton County, NY

FROM: Paul L. Kahn  
On-Scene Coordinator  
Response and Prevention Branch



TO: B. Sprague, 2 ERRD-RPB  
J. LaPadula, 2ERRD-NYRB  
P. Simon, 2ORC-NYCSFB  
R. Byrnes, 2OIG  
C. Kelley, 2RST  
Chf. M. Shafer, GFD  
J. Higgins, 2ERRD-RPB  
M. H. Cervantes-Gross, 2CD  
R. Cahill, 2CD-PAT  
J. Daloia, 2RPB-ER  
M. McClean, NYSDEC R-5  
R. Ellis, Dir. GDPW

**POLREP No.:** Four (4)

**I. BACKGROUND:**

SITE NO:	QW
Delivery Order No:	040
Response Authority:	CERCLA
NPL Status:	Non-NPL
Action Memo Approval Date	5/16/01
Start Date:	4/5/01
Mobilization Date :	4/6/01
Demobilization Date:	4/10/01
Remobilization Date	6/5/01
Completion Date:	TBD

**II. SITE INFORMATION:**

**A. Incident Category:** CERCLA time-critical removal action

**1. Site Description**

The Site is a defunct leather tannery consisting of two processing buildings and various out-buildings, located in mixed residential/commercial area. Tannery abandoned 7 years ago along with hundreds of drums of chemicals, including corrosives, metallic pigments, resins, acids, lab chemicals, water-reactive solids, chromium solutions, and bio-waste consisting of animal hair, skin fleshings, and small body parts..

Main building in very poor physical condition; the roof has collapsed in 4 places. Portions of first floor fell through to the basement, and the floors are sagging in many places. Bearing columns in the basement are deflected and split. Building has been condemned by the City, and it is unsafe to use motorized equipment inside.

## **2. Description of Threat**

Primary threat is from fire, or public access to chemicals and biological waste in basement and other areas of Site. Secondary threat is from additional collapse of roof and/or floors.

## **III. RESPONSE INFORMATION:**

### **A. Current Situation**

Site stabilized; access limited by signs and fencing. Chemical containers being overpacked and moved to central staging area for sampling. Chemist on site setting up lab and preparing for disposal studies. Chemicals moved from Bldg.#1 first floor to outside area.

### **B. Actions Taken**

46 chemical containers from Building #1 restaged outside due to partial collapse of first floor. Area deemed too dangerous for crew to work in; containers will be moved to new staging area as soon as area is prepared with visqueen and berms.

Loose pieces of asbestos-containing material collected from around site and bulked into drum.

Former maintenance supervisor of IL visited site and provided valuable insight regarding USTs and certain pieces of process equipment that had been unidentifiable prior to his visit. As a result, it was determined that there are no USTs at the site, and there is a solvent storage tank and a solvent still in the processing area of Building #2. It was also confirmed that the bulk crystalline material found in the bunkers in Building #2 is sodium chloride used to make brine solution.

Bridge spanning creek bisecting site redecked, allowing full access to chemicals containers and bio-waste in Building #2.

ERRS began bulking non-contaminated wood debris and old pallets in to roll-offs for disposal.

ERRS provided Labor Categories to GCMB for D.B.A. labor rate determinations for demolition of Building #1.

T&D Coordinator preparing bids for disposal of empty metal, fiber, and poly drums.

Liquid waste in on-site WWTP to be sampled for possible one-time discharge to POTW.

Entire crew visited operating tannery across town to gain insight into tannery ops and how chemicals are used in tanning industry.

Rep from bio-waste remediation company visited site to review waste stream and provide cost estimate and description of work to be done. Information will be used to work-up RFP for bidding purposes.

### **C. Key Issues**

Key issue remains the safe handling of bio waste located in both process buildings. CDC is sending two IHs to visit site on 6/26-27 to evaluate bio-waste with respect to possible contagious organisms and potential exposure pathways. CDC will make recommendations for PPE and handling/packing procedures, and evaluate bio-waste remediation subcontractor's work plan.

Second, but minor issue, is the demolition of the main building, which will involve Davis-Bacon Act labor rates. GCMB will send request to DOL for labor rate determination so RFP for the demolition can be sent.

### **D. Next Steps**

Set up outside staging area for chemical containers and begin sampling for disposal.

Continue bulking non-contaminated wood debris and old pallets.

Begin moving overpacked chemicals from Building #2 across creek to new staging area.

Set up on-site lab for bulking studies and sample storage.

Meet with CDC reps to discuss bio-waste stream handling and disposal.

## **IV. COST INFORMATION**

The following table presents information on estimated costs for the removal action:

	<u>Ceiling</u>	<u>Costs to Date</u>	<u>Remaining Project Funds</u>
<b>ERRS</b>	\$600,000	\$84,000	\$ 516,000
<b>RST</b>	-----	(\$29,000 )*	-----
<b>EPA</b>	-----	-----	-----
	-----	-----	-----
<b>TOTAL</b>	<b>\$600,000</b>	<b>\$113,000</b>	<b>\$ 516,000</b>



**Percent of Ceiling Utilized to Date: 14%**

\*RST costs are level-of-effort and do not actually come out of total project ceiling, and as such RST costs are not deducted from available removal project funds

**Note: The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The costs provided in this report are an estimate and do not reflect a monetary figure that EPA may include in any claims for cost recovery.**

**V. DISPOSITION OF WASTES:**

Disposition of waste streams TBD

**Final POLREP \_\_\_\_\_ Further POLREPS Forthcoming XXX**

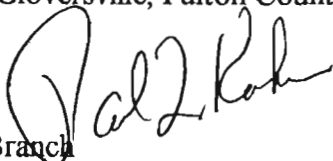
**JULY 3, 2001 EPA POLLUTION REPORT NO. 5**

U. S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION REPORT

DATE: 7/3/01

SUBJECT: Independent Leather Site, Gloversville, Fulton County, NY

FROM: Paul L. Kahn  
On-Scene Coordinator  
Response and Prevention Branch



TO: B. Sprague, 2 ERRD-RPB  
J. LaPadula, 2ERRD-NYRB  
P. Simon, 2ORC-NYCSFB  
R. Byrnes, 2OIG  
C. Kelley, 2RST  
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R. Cahill, 2CD-PAT  
J. Daloia, 2RPB-ER  
M. McClean, NYSDEC R-5  
R. Ellis, Dir. GDPW

**POLREP No.:** Five (5)

**I. BACKGROUND:**

SITE NO:	QW
Delivery Order No:	040
Response Authority:	CERCLA
NPL Status:	Non-NPL
Action Memo Approval Date	5/16/01
Start Date:	4/5/01
Mobilization Date :	4/6/01
Demobilization Date:	4/10/01
Remobilization Date	6/5/01
Completion Date:	TBD

**II. SITE INFORMATION:**

**A. Incident Category: CERCLA time-critical removal action**

**1. Site Description**

The Site is a defunct leather tannery consisting of two processing buildings and various out-buildings, located in mixed residential/commercial area. It was abandoned in 1994 along with hundreds of drums of chemicals, including corrosives, metallic pigments, resins, acids, lab chemicals, water-reactive solids, chromium solutions, and bio-waste consisting of animal hair, skin fleshings, and small body parts..

The main building is in poor physical condition; the roof has collapsed in 4 places. Portions of first floor fell through to the basement, the floors are sagging in many places, and bearing columns in the basement are deflected and split. Building has been condemned by the City, and it is unsafe to use motorized equipment inside.

## **2. Description of Threat**

Primary threat is from fire, or public access to chemicals and biological waste in basement and other areas of Site. Secondary threat is from additional collapse of roof and/or floors.

## **III. RESPONSE INFORMATION:**

### **A. Current Situation**

Site stabilized; access limited by signs and fencing. Chemical containers all overpacked and moved to central staging area for sampling. Chemist has set up on-site lab and is preparing disposal studies. Chemicals moved from Bldg.#1 first floor and Bldg.#2 second floor to outside bermed staging area.

### **B. Actions Taken**

More than 150 chemical containers from Bldg. #1 and Building #2 restaged in outside bermed area.

Landfill contacted regarding acceptance of composition siding, possibly containing non-friable asbestos. Response Manager advised to have material analyzed to rule out presence of asbestos.

To make room for staging drums and site supplies, ERRS continues to bulk non-contaminated wood debris and old pallets into roll-offs for disposal.

T&D Coordinator issued bids for disposal of empty metal, fiber, and poly drums for recycling.

Analytical results received for samples acquired from basement floor drains, sludge on basement floor, and wooden process equipment. Total chromium concentrations ranged from 86 ppm to 27,000 ppm. Liquid and sludge samples taken from on-site WWTP and sent to lab for analysis.

Two IHs from CDC/NIOSH visited site to review bio-waste stream and provide OSC with recommendations for handling, packaging, and disposing of the hair, fleshings, and animal body parts. Written report with recommendations due to OSC during week of 7/9.

Bids for the demolition of the main processing building issued by ERRS. OSC making inquiries about possible free, or reduced-cost for building demolition by individuals other than demolition contractors.

Discussion opened between ERRS and property owner near Site regarding access to reduced cost, clean dirt for backfilling excavation after all remnants of main processing building has been removed.

Additional 300 feet of fencing erected parallel to Bldg. #2 between building and jogging/bike trail to prevent access to rear of site by youths on bikes and motorcycles.

ERRS began construction of CRZ and airlock in Bldg. #2 for access/egress to area where the roll-off of bio-waste is staged. Entry and exit to area will be controlled by using air-lock/CRZ combination and sealing main entrance. Work area will be put under filtered, negative pressure during handling and bagging of bio-waste to minimize release of fugitive emissions possibly contaminated with microbiological organisms.

RST contacting companies in effort to recycle or dispose of waste chemicals found on-site. Most success achieved in recycling pH-adjusting chemicals to local tannery.

### **C. Key Issues**

Key issue remains the safe handling of bio-waste located in both process buildings. CDC sent personnel to site to evaluate bio-waste with respect to possible contagious organisms and potential exposure pathways. CDC will make recommendations to OSC for PPE and handling/packing procedures, and evaluate bio-waste remediation work plan.

Secondary issue is the demolition of the main building (possibly involving Davis-Bacon Act labor rates) and the increasing instability of the main processing building. Over the past weekend there was another partial roof collapse due to high winds in the area, further justifying the need to demolish this structure prior to remediation of basement.

### **D. Next Steps**

Prepare analytical samples for profiling for disposal. Conduct compatibility studies for bulking chemicals for disposal.

Continue bulking non-contaminated wood debris and old pallets.

Review CDC/NIOSH report and recommendations.

Continue efforts to locate possible sources to accept waste chemicals for reuse or disposal.

Prepare draft procedures for entering bio-waste area and the removal of this waste stream. Final procedures will take into account recommendations from CDC/NIOSH, will be considered as an amendment to the Site HASP, and will be included in the Site Work Plan.

Prepare draft demolition plan for Main Building.

#### **IV. COST INFORMATION**

The following table presents information on estimated costs for the removal action:

	<u>Ceiling</u>	<u>Costs to Date</u>	<u>Remaining Project Funds</u>
<b>ERRS</b>	\$600,000	\$110,000	\$ 493,000
<b>RST</b>	----	(\$ 35,000 )*	----
<b>EPA</b>	----	----	----
	-----	-----	-----
<b>TOTAL</b>	<b>\$600,000</b>	<b>\$145,000</b>	<b>\$ 493,000</b>

**Percent of Ceiling Utilized to Date: 20%**

\*RST costs are level-of-effort and do not actually come out of total project ceiling, and as such RST costs are not deducted from available removal project funds

**Note: The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The costs provided in this report are an estimate and do not reflect a monetary figure that EPA may include in any claims for cost recovery.**

#### **V. DISPOSITION OF WASTES:**

Disposition of waste streams TBD

**Final POLREP \_\_\_\_\_ Further POLREPS Forthcoming XXX**

**JULY 9, 2001 EPA POLLUTION REPORT NO. 6**

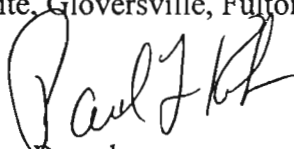


U. S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION REPORT

DATE: 7/9/01

SUBJECT: Independent Leather Site, Gloversville, Fulton County, NY

FROM: Paul L. Kahn  
On-Scene Coordinator  
Response and Prevention Branch



TO: B. Sprague, 2 ERRD-RPB  
J. LaPadula, 2ERRD-NYRB  
P. Simon, 2ORC-NYCSFB  
R. Byrnes, 2OIG  
C. Kelley, 2RST  
Chf. M. Shafer, GFD  
J. Higgins, 2ERRD-RPB  
M. H. Cervantes-Gross, 2CD  
R. Cahill, 2CD-PAT  
J. Daloia, 2RPB-ER  
M. McClean, NYSDEC R-5  
R. Ellis, Dir. GDPW

**POLREP No.:** Six (6)

**I. BACKGROUND:**

SITE NO:	QW
Delivery Order No:	040
Response Authority:	CERCLA
NPL Status:	Non-NPL
Action Memo Approval Date	5/16/01
Start Date:	4/5/01
Mobilization Date :	4/6/01
Demobilization Date:	4/10/01
Remobilization Date	6/5/01
Completion Date:	TBD

**II. SITE INFORMATION:**

**A. Incident Category: CERCLA time-critical removal action**

**1. Site Description**

The Site is a defunct leather tannery consisting of two processing buildings and various out-buildings, located in mixed residential/commercial area. It was abandoned in 1994 along with hundreds of drums of chemicals, including corrosives, metallic pigments, resins, acids, lab chemicals, water-reactive solids, chromium solutions, and bio-waste consisting of animal hair, skin fleshings, and small body parts.

The main building is in poor physical condition; the roof has collapsed in 4 places. Portions of first floor fell through to the basement, the floors are sagging in many places, and bearing columns in the basement are deflected and split.

## **2. Description of Threat**

Primary threat is from fire, or public access to chemicals and biological waste in basement and other areas of Site. Secondary threat is from additional collapse of roof and/or floors.

## **III. RESPONSE INFORMATION:**

### **A. Current Situation**

Chemist continues to acquire waste samples for disposal profiling. ERRS continues to bulk-out non-haz wood debris to enlarge area for staging overpacked drums. CRZ/airlock area prepared in biowaste area to allow for Level B entry to video and inventory chemical containers. Pickup of empty fiber, metal and poly drums for recycling/disposal scheduled for this week. ERRS will begin using shovels to remove contaminated sludge from drainage system in basement of Bldg. #1.

### **B. Actions Taken**

ERRS continues to bulk non-contaminated wood debris and old pallets into roll-offs for disposal.

OSC located a leather recycler who will take scrap leather and pay freight costs to NC. OSC will coordinate with OSC Solecki at Karg Tannery to make joint shipment. Three wood recyclers have also been contacted and have indicated interest in buying surplus uncontaminated wood from demolition of building. It is anticipated that sufficient wood can be recycled to significantly reduce need and cost of disposal.

Additional fencing strung parallel to the jogging trail has been successful in preventing access to rear of site by youths on bikes and motorcycles.

Siding from building #1 was collected and sent for asbestos analysis (198.1 PLM). The siding from the building is Chrysotile, which contains 8.8% asbestos.

RST continues to contact companies in effort to recycle or dispose of waste chemicals found on-site.

### **C. Key Issues**

Key issue remains the safe handling of bio-waste located in both process buildings. OSC awaiting report from CDC with recommendations for biowaste handling/packing procedures.

Secondary issue of possible applicability of Davis-Bacon Act to the demolition has been resolved. OCMB has issued memo to OSC stating that DBA rates will not apply in this instance.

#### **D. Next Steps**

Prepare analytical samples for profiling for disposal. Continue conducting compatibility studies for bulking chemicals for disposal.

Continue bulking non-contaminated wood debris and old pallets.

Review CDC/NIOSH report and recommendations..

Continue efforts to locate possible sources to accept waste chemicals for reuse or disposal.

Continue preparation of draft procedures for entering bio-waste area and the removal of this waste stream. Final procedures will take into account recommendations from CDC/NIOSH, will be considered as an amendment to the Site HASP, and will be included in the Site Work Plan.

Prepare draft demolition plan for Main Building.

#### **IV. COST INFORMATION**

The following table presents information on estimated costs for the removal action:

	<u>Ceiling</u>	<u>Costs to Date</u>	<u>Remaining Project Funds</u>
ERRS	\$600,000	\$127,000	\$ 473,000
RST	-----	(\$ 38,500 )*	-----
EPA	-----	-----	-----
<b>TOTAL</b>	<b>\$600,000</b>	<b>\$165,500</b>	<b>\$ 473,000</b>

**Percent of Ceiling Utilized to Date: 22%**

\*RST costs are level-of-effort and do not actually come out of total project ceiling, and as such RST costs are not deducted from available removal project funds

**Note: The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The costs provided in this report are an estimate and do not reflect a monetary figure that EPA may include in any claims for cost recovery.**

**V. DISPOSITION OF WASTES:**

Disposition of waste streams TBD

**Final POLREP \_\_\_\_\_ Further POLREPS Forthcoming XXX**

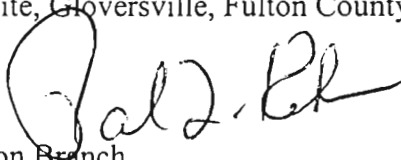
**JULY 16, 2001 EPA POLLUTION REPORT NO. 7**

U. S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION REPORT

DATE: 7/16/01

SUBJECT: Independent Leather Site, Gloversville, Fulton County, NY

FROM: Paul L. Kahn  
On-Scene Coordinator  
Response and Prevention Branch



TO: B. Sprague, 2 ERRD-RPB  
J. LaPadula, 2ERRD-NYRB  
P. Simon, 2ORC-NYCSFB  
R. Byrnes, 2OIG  
C. Kelley, 2RST  
Chf. M. Shafer, GFD  
J. Higgins, 2ERRD-RPB  
M. H. Cervantes-Gross, 2CD  
R. Cahill, 2CD-PAT  
J. Daloia, 2RPB-ER  
M. McClean, NYSDEC R-5  
R. Ellis, Dir. GDPW

**POLREP No.:** Seven (7)

**I. BACKGROUND:**

SITE NO:	QW
Delivery Order No:	040
Response Authority:	CERCLA
NPL Status:	Non-NPL
Action Memo Approval Date	5/16/01
Start Date:	4/5/01
Mobilization Date :	4/6/01
Demobilization Date:	4/10/01
Remobilization Date	6/5/01
Completion Date:	TBD

**II. SITE INFORMATION:**

~~A. Incident Category: CERCLA time-critical removal action~~

**1. Site Description**

The Site is a defunct leather tannery consisting of two processing buildings and various out-buildings, located in a mixed residential/commercial area. It was abandoned in 1994 along with hundreds of drums of chemicals, including corrosives, metallic pigments, resins, acids, lab chemicals, water-reactive solids, chromium solutions, and biowaste consisting of animal hair, skin fleshings, and small body parts.

The main building is in poor physical condition; the roof has collapsed in 4 places. Portions of first floor fell through to the basement, the floors are sagging in many places, and bearing columns in the basement are deflected and split.

## **2. Description of Threat**

Primary threat is from fire, or contact with chemicals and biological waste. Secondary threat is from additional collapse of roof and/or floors.

### **III. RESPONSE INFORMATION:**

#### **A. Current Situation**

Chemist continues to acquire waste samples for disposal profiling. ERRS continues to bulk-out non-haz wood debris to enlarge area for staging overpacked drums. CRZ/airlock area prepared in biowaste area to allow for Level B entry to video, inventory chemical containers, and take samples. Pickup of 385 empty fiber, metal and poly drums for recycling/disposal accomplished. ERRS has begun shoveling contaminated sludge from drainage system in basement of Bldg. #1. All chemical containers overpacked and moved to central staging area and secured.

#### **B. Actions Taken**

ERRS continues to bulk non-contaminated wood debris and old pallets into roll-offs for disposal.

Leather recycler visited site, agreed to accept all leather items, and will ship prepaid to his factory. OSC will coordinate with OSC Solecki at Karg Tannery to make joint shipment. Wood recyclers visited site and expressed an interest in buying surplus, uncontaminated wood from demolition of building. It is anticipated that sufficient wood can be recycled to reduce need for and cost of disposal, and save landfill capacity.

RST continues to contact companies in effort to recycle or dispose of waste chemicals found on-site.

Based on verbal information from CDC, interim procedures for entering biowaste room, ensuring capture of fugitive dust, and decon of personnel have been devised and incorporated into the Site HASP. Procedures will be modified as necessary after receipt of formal CDC report. Under HEPA-filtered, negative air pressure, biowaste in roll-off, other containers, and from other surfaces will be wetted with a soap/bleach solution, poly-bagged, and bulked into poly drums. Drums will be deconed with bleach and shipped for disposal as non-chemical tannery waste.



Bids for building demolition issued, demo subcontractors toured site with RM, and indicated that the demo will take 3-4 weeks, with disposal occurring concurrently. Depending on bid replies, ERRS could instead be undertaking the demolition. Demo anticipated to commence on or about August 1, 2001.

Approx. 35 wooden leather processing drums will be tested for metallic contamination. Any non-contaminated drums will be disassembled and staged for sale with other usable wood.

With the exception of a few bags of unknown powdered materials, all chemical containers have been moved from both buildings and staged in the drum consolidation area pending profiling for disposal.

Analytical results of samples from on-site WWTP lagoons shows sludge layer to be non-hazardous. 15,000 gallons of liquid out of 40,000 gallons total is high for Cr, Zn and Cu. Local POTW stated that if levels of these metals can be reduced to 14, 2, and 0.2 ppm respectively, EPA will be granted approval for a one-time discharge into the sewer. ERRS has devised a chemical procedure that will reduce levels of above metals well below discharge limits, and will feed-in liquid wastes over a 3 to 4 day period. Sludge layer, approx. 200 cubic yards, will be dewatered, mixed with clean soil, and used on-site as backfill.

Issue of DBA applicability to the demolition has been resolved by EPA OCMB and DOL. DBA does not apply to this type of activity because there will not be any reconstruction (under the ERRS contract) after the demolition is completed, and as such SCA rates will apply.

385 empty metal, plastic, and fiber chemical containers shipped off-site for disposal.

TV reporter from W49BA-TV (Gloversville) interviewed OSC and aired a 30 minute special covering the removal action. OSC will request copy of taped broadcast for site files.

### **C. Key Issues**

Key issue remains the safe handling of bio-waste located in both process buildings. OSC still awaiting report from CDC with recommendations for biowaste handling/packing procedures.

### **D. Next Steps**

Continue preparing samples for profiling for disposal. Continue conducting compatibility studies for bulking chemicals for disposal.

Continue bulking non-contaminated wood debris and old pallets.

Review CDC/NIOSH report and recommendations..

Continue efforts to locate possible sources to accept waste chemicals for reuse or disposal.

Begin manual removal of gross sludge contamination from basement floor drains in Bldg. #1.

#### IV. COST INFORMATION

The following table presents information on estimated costs for the removal action:

	<u>Ceiling</u>	<u>Costs to Date</u>	<u>Remaining Project Funds</u>
ERRS	\$600,000	\$145,000	\$ 455,000
RST	----	(\$ 38,500 )*	----
EPA	----	----	----
	-----	-----	-----
TOTAL	\$600,000	\$165,500	\$ 455,000

Percent of Ceiling Utilized to Date: 25%

\*RST costs are level-of-effort and do not actually come out of total project ceiling, and as such RST costs are not deducted from available removal project funds

**Note: The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The costs provided in this report are an estimate and do not reflect a monetary figure that EPA may include in any claims for cost recovery.**

#### V. DISPOSITION OF WASTES:

Disposition of waste streams TBD

Final POLREP \_\_\_\_\_ Further POLREPS Forthcoming XXX

**JULY 24, 2001 EPA POLLUTION REPORT NO. 8**

U. S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION REPORT

DATE: 7/24/01

SUBJECT: Independent Leather Site, Gloversville, Fulton County, NY

FROM: Paul L. Kahn  
On-Scene Coordinator  
Response and Prevention Branch

TO: B. Sprague, 2 ERRD-RPB  
J. LaPadula, 2ERRD-NYRB  
J. Regna, 2ORC-NYCSFB  
R. Byrnes, 2OIG  
C. Kelley, 2RST  
Chf. M. Shafer, GFD

J. Higgins, 2ERRD-RPB  
M. H. Cervantes-Gross, 2CD  
R. Cahill, 2CD-PAT  
J. Daloia, 2RPB-ER  
M. McClean, NYSDEC R-5  
✓ R. Ellis, Dir. GDPW

**POLREP No.:** Eight (8)

**I. BACKGROUND:**

SITE NO:	QW
Delivery Order No:	040
Response Authority:	CERCLA
NPL Status:	Non-NPL
Action Memo Approval Date	5/16/01
Start Date:	4/5/01
Mobilization Date :	4/6/01
Demobilization Date:	4/10/01
Remobilization Date	6/5/01
Completion Date:	TBD

**II. SITE INFORMATION:**

**A. Incident Category:** CERCLA time-critical removal action

**1. Site Description**

The Site is a defunct leather tannery consisting of two processing buildings and various out-buildings, located in a mixed residential/commercial area. It was abandoned in 1994 along with hundreds of drums of chemicals, including corrosives, metallic pigments, resins, acids, lab chemicals, water-reactive solids, chromium solutions, and biowaste consisting of animal hair, skin fleshings, and small body parts.

The main building is in poor physical condition, the roof has collapsed in 4 places. Portions of first floor fell through to the basement, the floors are sagging in many places, and bearing columns in the basement are deflected and split.

## **2. Description of Threat**

Primary threat is from fire, or contact with chemicals and biological waste. Secondary threat is from additional collapse of roof and/or floors.

## **III. RESPONSE INFORMATION:**

### **A. Current Situation**

Chemist completed sampling for disposal profiling. ERRS continues to bulk-out non-haz wood debris to enlarge area for staging overpacked drums. Level B PPE entry into biowaste area in Bldg #2 performed to videotape conditions, inventory chemical containers, and acquire samples. ERRS completed hand-shoveling of contaminated sludge from drain system in basement of Bldg. #1. All chemical containers overpacked and moved to central staging area.

### **B. Actions Taken**

ERRS continues to bulk non-contaminated wood debris and old pallets into roll-offs for disposal.

Floor drains in Bldg.#1 were hand-shoveled to remove gross contamination, generating 3 cu. yards of contaminated sludge. Some areas of drainage system are not accessible for various physical reasons, and will be addressed after building is demolished.

ERRS completed bulking chemical containers from both buildings, consolidating 368 containers into 256 drums for disposal.

Leather for recycling has been collected and staged for pickup. OSC will coordinate with OSC Solecki at Karg Tannery to try to make combined shipment.

Based on verbal information from CDC, interim procedures for entering biowaste room, ensuring capture of fugitive dust, and decon of personnel have been implemented. Under negative air pressure and using a HEPA filter, ERRS moved chemical drums away from biowaste roll-off and sampled contents for analysis. Visual observation of contents indicated that most likely it is roofing tar. ERRS bulked 40 poly drums of biowaste from floor and smaller containers, including animal hair, body parts (tails/feet), and fleshings.

- 3 -

Prior to handling, all biowaste is sprayed with bleach/soap solution. Empty drums are individually covered with shrink-wrap to minimize surface area exposed to potential biological contamination. The full drums are moved to a decon area where the shrink wrap is removed, the drums are wiped with decon solution, and then moved to a clean staging area pending disposal.

ORC finalized Section Notice/Section 104(e) letter which was sent to PRP on 7/6/01. No reply received as of this date.

Bids for building demolition returned from prospective subcontractors. Depending on bid replies, ERRS could be used to perform the demolition, which is planned to begin on or about August 1, 2001.

Samples of contents of storage tanks and wood leather processing drums acquired and sent to lab for analysis.

RST mapped the basement area in Bldg.#1 to show the location and ID# of all wooden process equipment and storage tanks.

Local tannery politely refused offer to take surplus but usable chemicals found on the Site. These chemicals will be included with the other 256 drums of waste slated for disposal.

Fire Department was notified that all chemical containers have been moved from Building #1 and staged in the drum consolidation area.

RST sampled and haz-cated oily fluids from two partially filled storage tanks in Bldg.#1.

Analytical results due back for tank and wood samples for reuse or disposal purposes.

W49BA-TV (Gloversville) aired a 30-minute special (third time) covering the removal action. OSC has requested a copy of the broadcast for the site file

Additional RST member on-site for training in Level B PPE.

Bids were sent out for disposal of 180 gallons of >50 ppm PCB-transformer fluid.

Chemicals ordered for the on-site treatment of 15,000 gallons of contaminated process water.

RST videotaped the interior areas of the Site and gave tape to W49BA-TV to be edited into the tape made during the TV video.

### C. Key Issues

Key issue remains the safe handling of biowaste located in both process buildings. OSC has verbal report from CDC with recommendations for biowaste handling/packing procedures. CDC has seemingly rethought the situation and determined that the biowaste does not require any extraordinary protective measures, but OSC has decided to continue working with negative air and HEPA filter. Based on CDC recommendation and manufacturer's product information that the PM-100 respirator cartridges, used by the crew in Level C, are equipped with HEPA filters, OSC and RM decided to downgrade respiratory protection from Level B to C.

### D. Next Steps

Begin removal of biowaste and debris from roll-off container in Bldg. #2.

Begin manual removal of gross sludge contamination from basement floor drains in Bldg. #2.

Begin collecting and bulking animal hair from floors inside Bldg. #2..

Send out composite samples from chemical containers for disposal profiling.

Continue bulking non-contaminated wood debris and old pallets for disposal.

Perform on-site treatment of contaminated process wastewater, resubmit for analysis, and dispose via sewer to WWTP.

Review building demolition bid responses with RM.

## IV. COST INFORMATION

The following table presents information on estimated costs for the removal action:

	<u>Ceiling</u>	<u>Costs to Date</u>	<u>Remaining Project Funds</u>
ERRS	\$600,000	\$188,000	\$402,000
RST	—	(\$ 43,500)*	—
EPA	—	—	—
<b>TOTAL</b>	<b>\$600,000</b>	<b>\$231,500</b>	<b>\$ 402,000</b>

Percent of Ceiling Utilized to Date: 32%

- 5 -

\*RST costs are level-of-effort and do not actually come out of total project ceiling; as such RST costs are not deducted from available removal project funds

**Note:** The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The costs provided in this report are an estimate and do not reflect a monetary figure that EPA may include in any claims for cost recovery.

#### **V. DISPOSITION OF WASTES:**

All biowaste material to be shipped for incineration.

Disposal of chemical containers TBD depending on individual chemical profiles.

Liquid waste stream from on-site WWTP will be treated on-site and discharged to local WWTP in a one-time event..

Disposal of contaminated soil/sludge/wood TBD.

Non-contaminated leather goods will be given to recycler for reuse or introduction into commerce.

Approximately 6 cubic yards of baghouse dust/fines from leather buffing processes may be sent to landfill, pending results of lab analysis for chromium.

The few items of asbestos-containing material will be solidified to a monolith with cement in a 55-gallon drum and disposed of in local landfill.

All empty glass chemical containers will be put into crush-drum and shipped for disposal TBD.

Final POLREP \_\_\_\_\_

Further POLREPS Forthcoming **XXX**



U. S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION REPORT

DATE: 7/16/01

SUBJECT: Independent Leather Site, Gloversville, Fulton County, NY

FROM: Paul L. Kahn  
On-Scene Coordinator  
Response and Prevention Branch

TO: B. Sprague, 2 ERRD-RPB  
J. LaPadula, 2ERRD-NYRB  
P. Simon, 2ORC-NYCSFB  
R. Byrnes, 2OIG  
C. Kelley, 2RST  
Chf. M. Shafer, GFD

J. Higgins, 2ERRD-RPB  
M. H. Cervantes-Gross, 2CD  
R. Cahill, 2CD-PAT  
J. Daloia, 2RPB-ER  
M. McClean, NYSDEC R-5  
R. Ellis, Dir. GDPW

**POLREP No.:** Seven (7)

**I. BACKGROUND:**

SITE NO:	QW
Delivery Order No:	040
Response Authority:	CERCLA
NPL Status:	Non-NPL
Action Memo Approval Date	5/16/01
Start Date:	4/5/01
Mobilization Date :	4/6/01
Demobilization Date:	4/10/01
Remobilization Date	6/5/01
Completion Date:	TBD

**II. SITE INFORMATION:**

**A. Incident Category:** CERCLA time-critical removal action

**1. Site Description**

The Site is a defunct leather tannery consisting of two processing buildings and various out-buildings, located in a mixed residential/commercial area. It was abandoned in 1994 along with hundreds of drums of chemicals, including corrosives, metallic pigments, resins, acids, lab chemicals, water-reactive solids, chromium solutions, and biowaste consisting of animal hair, skin fleshings, and small body parts.

The main building is in poor physical condition; the roof has collapsed in 4 places. Portions of first floor fell through to the basement, the floors are sagging in many places, and bearing columns in the basement are deflected and split.

## **2. Description of Threat**

Primary threat is from fire, or contact with chemicals and biological waste. Secondary threat is from additional collapse of roof and/or floors.

## **III. RESPONSE INFORMATION:**

### **A. Current Situation**

Chemist continues to acquire waste samples for disposal profiling. ERRS continues to bulk-out non-haz wood debris to enlarge area for staging overpacked drums. CRZ/airlock area prepared in biowaste area to allow for Level B entry to video, inventory chemical containers, and take samples. Pickup of 385 empty fiber, metal and poly drums for recycling/disposal accomplished. ERRS has begun shoveling contaminated sludge from drainage system in basement of Bldg. #1. All chemical containers overpacked and moved to central staging area and secured.

### **B. Actions Taken**

ERRS continues to bulk non-contaminated wood debris and old pallets into roll-offs for disposal.

Leather recycler visited site, agreed to accept all leather items, and will ship prepaid to his factory. OSC will coordinate with OSC Solecki at Karg Tannery to make joint shipment. Wood recyclers visited site and expressed an interest in buying surplus, uncontaminated wood from demolition of building. It is anticipated that sufficient wood can be recycled to reduce need for and cost of disposal, and save landfill capacity.

RST continues to contact companies in effort to recycle or dispose of waste chemicals found on-site.

Based on verbal information from CDC, interim procedures for entering biowaste room, ensuring capture of fugitive dust, and decon of personnel have been devised and incorporated into the Site HASP. Procedures will be modified as necessary after receipt of formal CDC report. Under HEPA-filtered, negative air pressure, biowaste in roll-off, other containers, and from other surfaces will be wetted with a soap/bleach solution, poly-bagged, and bulked into poly drums. Drums will be deconed with bleach and shipped for disposal as non-chemical tannery waste.

- 3 -

Bids for building demolition issued, demo subcontractors toured site with RM, and indicated that the demo will take 3-4 weeks, with disposal occurring concurrently. Depending on bid replies, ERRS could instead be undertaking the demolition. Demo anticipated to commence on or about August 1, 2001.

Approx. 35 wooden leather processing drums will be tested for metallic contamination. Any non-contaminated drums will be disassembled and staged for sale with other usable wood.

With the exception of a few bags of unknown powdered materials, all chemical containers have been moved from both buildings and staged in the drum consolidation area pending profiling for disposal.

Analytical results of samples from on-site WWTP lagoons shows sludge layer to be non-hazardous. 15,000 gallons of liquid out of 40,000 gallons total is high for Cr, Zn and Cu. Local POTW stated that if levels of these metals can be reduced to 14, 2, and 0.2 ppm respectively, EPA will be granted approval for a one-time discharge into the sewer. ERRS has devised a chemical procedure that will reduce levels of above metals well below discharge limits, and will feed-in liquid wastes over a 3 to 4 day period. Sludge layer, approx. 200 cubic yards, will be dewatered, mixed with clean soil, and used on-site as backfill.

Issue of DBA applicability to the demolition has been resolved by EPA OCMB and DOL. DBA does not apply to this type of activity because there will not be any reconstruction (under the ERRS contract) after the demolition is completed, and as such SCA rates will apply.

385 empty metal, plastic, and fiber chemical containers shipped off-site for disposal.

TV reporter from W49BA-TV (Gloversville) interviewed OSC and aired a 30 minute special covering the removal action. OSC will request copy of taped broadcast for site files.

#### C. Key Issues

Key issue remains the safe handling of bio-waste located in both process buildings. OSC still awaiting report from CDC with recommendations for biowaste handling/packing procedures.

#### D. Next Steps

Continue preparing samples for profiling for disposal. Continue conducting compatibility studies for bulking chemicals for disposal.

Continue bulking non-contaminated wood debris and old pallets.

Review CDC/NIOSH report and recommendations..

Continue efforts to locate possible sources to accept waste chemicals for reuse or disposal.

Begin manual removal of gross sludge contamination from basement floor drains in Bldg. #1.

#### **IV. COST INFORMATION**

The following table presents information on estimated costs for the removal action:

	<u>Ceiling</u>	<u>Costs to Date</u>	<u>Remaining Project Funds</u>
ERRS	\$600,000	\$145,000	\$ 455,000
RST	----	(\$ 38,500 )*	----
EPA	----	----	----
<b>TOTAL</b>	<b>\$600,000</b>	<b>\$165,500</b>	<b>\$ 455,000</b>

Percent of Ceiling Utilized to Date: 25%

\*RST costs are level-of-effort and do not actually come out of total project ceiling, and as such RST costs are not deducted from available removal project funds

**Note: The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The costs provided in this report are an estimate and do not reflect a monetary figure that EPA may include in any claims for cost recovery.**

#### **V. DISPOSITION OF WASTES:**

Disposition of waste streams TBD

Final POLREP \_\_\_\_\_

Further POLREPS Forthcoming XXX

**JULY 30, 2001 EPA POLLUTION REPORT NO. 9**

U. S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION REPORT

DATE: 7/30/01

SUBJECT: Independent Leather Site, Gloversville, Fulton County, NY

FROM: Paul L. Kahn  
On-Scene Coordinator  
Response and Prevention Branch

TO: B. Sprague, 2 ERRD-RPB  
J. LaPadula, 2ERRD-NYRB  
J. Regna, 2ORC-NYCSFB  
R. Byrnes, 2OIG  
C. Kelley, 2RST  
Chf. M. Shafer, GFD  
J. Higgins, 2ERRD-RPB  
M. H. Cervantes-Gross, 2CD  
R. Cahill, 2CD-PAT  
J. Daloia, 2RPB-ER  
M. McClean, NYSDEC R-5  
R. Ellis, Dir. GDPW

**POLREP No.:** Nine (9)

**I. BACKGROUND:**

SITE NO:	QW
Delivery Order No:	040
Response Authority:	CERCLA
NPL Status:	Non-NPL
Action Memo Approval Date	5/16/01
Start Date:	4/5/01
Mobilization Date :	4/6/01
Demobilization Date:	4/10/01
Remobilization Date	6/5/01
Completion Date:	TBD

**II. SITE INFORMATION:**

**A. Incident Category:** CERCLA time-critical removal action

**1. Site Description**

The Site is a defunct leather tannery consisting of two processing buildings and various out-buildings, located in a mixed residential/commercial area. It was abandoned in 1994 along with hundreds of drums of chemicals, including corrosives, metallic pigments, resins, acids, lab chemicals, water-reactive solids, chromium solutions, and biowaste consisting of animal hair, skin fleshings, and small body parts.

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The main building is in poor physical condition; the roof has collapsed in 4 places. Portions of first floor fell through to the basement, the floors are sagging in many places, and bearing columns in the basement are deflected and split.

## **2. Description of Threat**

Primary threat is from fire or contact with chemicals and biological waste. Secondary threat is from additional collapse of roof and/or floors.

## **III. RESPONSE INFORMATION:**

### **A. Current Situation**

Samples for disposal profiling sent to lab.. ERRS continues to bulk-out non-haz wood debris to enlarge area for staging overpacked drums. Level C PPE entry into biowaste area in Bldg #2 on-going to bulk biowaste. ERRS began dismantling portion of Bldg. #1 in order to access two vertical storage tanks filled with process sludge and liquids..

### **B. Actions Taken**

ERRS continues to bulk non-contaminated wood debris and old pallets into roll-offs for disposal.

30 pallets of scrap leather collected and staged for recycling. Coordinated with OSC Solecki at Karg Tannery for combined truck shipment on 8/1.

Section 107 Notice/Section 104(e) letter was thought to have been sent to PRP on 7/6/01. Indications are that it was not mailed. Copy of same letter with new cover letter sent to PRP 7/25.

Bids for building demolition returned from prospective subcontractors. After reviewing bids and conferring with RM, OSC determined that it was less expensive to have ERRS perform the demolition instead of subcontracting the work. Start of demo tentatively scheduled for week of 8/6. CD contacted for possible media event on day of demolition. Staging of some kind of media event under consideration by CD. City of Gloversville also indicated a desire to have public officials and local press attend event to mark the demolition of the old tannery.

Analytical results of sampling 28 wood tumblers revealed only one contaminated with chromium. The remainders will be dismantled and shipped to recycler for reuse.

Free ads placed on *Recycler World* Web site for 3,000-5,000 used red bricks and two 150 HP steam generators for sale.

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ERRS removed windows from main building and cut piping loose in preparation for building demolition.

Wooden beams in basement area sampled for possible chromium contamination. These beams are intended to be recycled with other wood from the building.

ERRS removed approximately 200 linear feet of asbestos-containing pipe insulation in preparation for demolition. Additional ACM in boiler room will remain in-place until after the demolition, as it is currently inaccessible.

ERRS crushed empty drums for disposal during week of 7/30.

Analytical results of 6 cubic yards of leather dust in baghouse show waste is not contaminated.

OSC, RM, RST, and principal equipment operator met with Gloversville DPW, FD, and PD to discuss logistics for building demolition. Items discussed were draft demolition plan, traffic control, dust suppression, public notification, adjacent power lines, and debris entering Cayadutta Creek.

### **C. Key Issues**

Key issues are the safe handling of biowaste located in both process buildings, and the upcoming demolition activities.

### **D. Next Steps**

Continue removal of biowaste and debris from roll-off container in Bldg.#2.

Begin manual removal of gross sludge contamination from basement floor drains in Bldg. #2.

Continue collecting and bulking animal hair from floors inside Bldg.#2..

Continue bulking non-contaminated wood debris and old pallets for disposal.

Begin on-site treatment of contaminated process wastewater, resubmit for analysis, and dispose via sewer to WWTP.



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**IV. COST INFORMATION**

The following table presents information on estimated costs for the removal action:

	<u>Ceiling</u>	<u>Costs to Date</u>	<u>Remaining Project Funds</u>
ERRS	\$600,000	\$234,000	\$366,000
RST	-----	(\$ 46,000 )*	-----
	-----	-----	-----
TOTAL	\$600,000	\$234,000	\$ 366,000

Percent of Ceiling Utilized to Date: 39%

\*RST costs are level-of-effort and do not actually come out of total project ceiling; as such RST costs are not deducted from available removal project funds

**Note: The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The costs provided in this report are an estimate and do not reflect a monetary figure that EPA may include in any claims for cost recovery.**

**V. DISPOSITION OF WASTES**

All biowaste material to be shipped for incineration.

Disposal of chemical containers TBD depending on individual chemical profiles.

Liquid waste stream from on-site WWTP will be treated on-site and discharged to local WWTP in a one-time event.

Disposal of contaminated soil/sludge/wood TBD.

Non-contaminated leather goods to be given to recycler for reuse or introduction into commerce.

Approximately 6 cubic yards of baghouse dust/fines from leather buffing processes will be sent to landfill for disposal as non-hazardous solid waste.

Asbestos-containing material will be solidified into monoliths with cement in 55-gallon drums and disposed of in county lined landfill.

All empty glass chemical containers will be shipped for disposal TBD.

Final POLREP \_\_\_\_\_ Further POLREPs Forthcoming XXX

**AUGUST 8, 2001 EPA POLLUTION REPORT NO. 9**

U. S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION REPORT

DATE: 8/8/01

SUBJECT: Independent Leather Site, Gloversville, Fulton County, NY

FROM: Paul L. Kahn  
On-Scene Coordinator  
Response and Prevention Branch

TO: B. Sprague, 2 ERRD-RPB  
J. LaPadula, 2ERRD-NYRB  
J. Regna, 2ORC-NYCSFB  
R. Byrnes, 2OIG  
C. Kelley, 2RST  
Chf. M. Shafer, GFD  
J. Higgins, 2ERRD-RPB  
M. H. Cervantes-Gross, 2CD  
R. Cahill, 2CD-PAT  
J. Daloia, 2RPB-ER  
M. McClean, NYSDEC R-5  
R. Ellis, Dir. GDPW

**POLREP No.:** Nine (9)

**I. BACKGROUND:**

SITE NO.	QW
Delivery Order No.	040
Response Authority.	CERCLA
NPL Status:	Non-NPL
Action Memo Approval Date	5/16/01
Start Date:	4/5/01
Mobilization Date :	4/6/01
Demobilization Date:	4/10/01
Remobilization Date	6/5/01
Completion Date:	TBD

**II. SITE INFORMATION:**

**A. Incident Category:** CERCLA time-critical removal action

**1. Site Description**

The Site is a defunct leather tannery consisting of two processing buildings and various out-buildings, located in a mixed residential/commercial area. It was abandoned in 1994 along with hundreds of drums of chemicals, including corrosives, metallic pigments, resins, acids, lab chemicals, water-reactive solids, chromium solutions, and biowaste consisting of animal hair, skin fleshings, and small body parts.

The main building is in poor physical condition, the roof has collapsed in 4 places. Portions of first floor fell through to the basement, the floors are sagging in many places, and bearing columns in the basement are deflected and split.

## **2. Description of Threat**

Primary threat is from fire, or contact with chemicals and biological waste.

## **III. RESPONSE INFORMATION:**

### **A. Current Situation**

Bids sent out for disposal of drummed wastes. ERRS continues to bulk-out non-haz wood debris. Removal activities in Bldg #2 continue on upper floor, consisting of gathering hair and spilled chemicals and bulking same for disposal. Preparations completed for demolition of Main building on 8/9. In preparation for the demolition activities, ERRS took down the machine shop building and the pigment room attached to the Main building.

### **B. Actions Taken**

ERRS continues to bulk non-contaminated wood debris and old pallets into roll-offs for disposal.

Civil Investigator Coakley on-site for 2 days reviewing records in office area of site.

ERRS bulked 14 55-gallon drums of hydraulic oil from elevator oil reservoir for disposal.

ERRS loaded 26 pallets of scrap leather onto truck for recycling.

ERRS bulked a total of 59 poly drums of biowaste from floor and smaller containers, including animal hair, body parts (tails/feet), and fleshings.

ORC Attorney Regna mailed Section Notice/Section 104(e) letter to PRP the week of 7/22/01.

Bids for building demolition returned from prospective reviewed. OSC determined that it would be less costly for ERRS to do the demolition, and as such subcontracting was not pursued.

Analytical results of sampling selected wood beams sold to recycler revealed no contamination.

Chemicals for on-site treatment of 15,000 gallons of contaminated process water arrived. Work will commence during week of 8/13.

Fiber and grain analysis of wood tumblers revealed the wood to be Redwood, and connecting bolts are made from Monel, a corrosion-resistant alloy of nickel and copper with a recycling value.

OSC, RM, and principal excavator operator met with City officials to review Demolition Plan and to ensure that all City concerns were addressed regarding demolition procedures, traffic control, dust control, etc.

Preparations completed for demolition of Main building. OSC worked with CD personnel on press release for event. City officials will be on-site for ceremonial removal of first section of building.

Analytical results of sampling 120' of pipe insulation revealed it to be 50% Chrysotile form asbestos.

One roll-off (= 10 tons) of scrap metal sent for recycling.

Analytical results of leather dust in baghouse revealed the material to be non-contaminated.

#### **C. Key Issues**

Key issues are the safe handling of biowaste located in both process buildings and the upcoming building demolition.

#### **D. Next Steps**

Continue removal of biowaste and debris from roll-off container in Bldg. #2.

Begin demolition of Main building on 8/9/01.

Begin manual removal of gross sludge contamination from basement floor drains in Bldg. #2.

Continue collecting and bulking animal hair from floors inside Bldg. #2..

Continue bulking non-contaminated wood debris and old pallets for disposal.

Begin on-site treatment of contaminated process wastewater, resubmit for analysis, and dispose via sewer to WWTP.

Begin paperwork to request additional funding for removal action.

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**IV. COST INFORMATION**

The following table presents information on estimated costs for the removal action:

	<u>Ceiling</u>	<u>Costs to Date</u>	<u>Remaining Project Funds</u>
<b>ERRS</b>	\$600,000	\$325,000	\$275,000
<b>RST</b>	-----	(\$ 46,000 )*	-----
<b>EPA</b>	-----	-----	-----
<b>TOTAL</b>	\$600,000	\$325,000	\$275,000

Percent of Ceiling Utilized to Date: 46%

\*RST costs are level-of-effort and do not actually come out of total project ceiling; as such RST costs are not deducted from available removal project funds

**Note:** The above accounting of expenditure is an estimate based on figures known to the OSC at the time this report was written. The costs provided in this report are an estimate only and do not reflect a monetary figure that EPA may include in any claims for cost recovery.

**V. DISPOSITION OF WASTES:**

All biowaste material to be shipped for incineration.

Disposal of chemical containers TBD depending on individual chemical profiles.

Liquid wastes in on-site WWTP will be treated on-site and discharged to local WWTP in a one-time event..

Disposal of contaminated soil/sludge/wood TBD.

Non-contaminated leather goods being given to recycler for reuse.

Approximately 6 cubic yards of baghouse dust from leather buffing processes to be sent to landfill as non-hazardous solid waste.

The asbestos-containing material may be solidified to a monolith with cement or disposed of in an approved landfill.

**Final POLREP \_\_\_\_\_**

**Further POLREPS Forthcoming XXX**

**AUGUST 18, 2001 EPA POLLUTION REPORT NO. SPECIAL**

U. S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION REPORT

**SPECIAL POLREP**

DATE: 8/18/01

SUBJECT: Independent Leather Site, Gloversville, Fulton County, NY

FROM: Paul L. Kahn  
On-Scene Coordinator  
Response and Prevention Branch

TO: B. Sprague, 2 ERRD-RPB  
J. LaPadula, 2ERRD-NYRB  
J. Regna, 2ORC-NYCSFB  
R. Byrnes, 2OIG  
C. Kelley, 2RST  
Chf. M. Shafer, GFD  
T. Rivero, 2OPM/GCMB  
S. Fitz-James, Hdqts.5202G

J. Higgins, 2ERRD-RPB  
M Cervantes-Gross, 2CD  
R. Cahill, 2CD-PAT  
J. Daloia, 2RPB-ER  
M. McClean, NYSDEC R-5  
R. Ellis, Dir. GDPW  
R. Manna, 2OPM/FMB

**POLREP No.:** SPECIAL

**I. BACKGROUND:**

SITE NO:	QW
Delivery Order No:	040
Response Authority:	CERCLA
NPL Status:	Non-NPL
Action Memo Approval Date	5/16/01
Start Date:	4/5/01
Mobilization Date :	4/6/01
Demobilization Date:	4/10/01
Remobilization Date	6/5/01
Completion Date:	TBD

**II. SITE INFORMATION:**

**A. Incident Category:** CERCLA time-critical removal action

**1. Site Description**

The Site is a defunct leather tannery consisting of two processing buildings and various out-buildings, located in a mixed residential/commercial area. It was abandoned in 1994 along with hundreds of drums of chemicals, including corrosives, metallic pigments, resins, acids,



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lab chemicals, water-reactive solids, chromium solutions, and biowaste consisting of animal hair, skin fleshings, and small body parts.

The main building is in poor physical condition; the roof has collapsed in 4 places. Portions of first floor fell through to the basement, the floors are sagging in many places, and bearing columns in the basement are deflected and split.

## **2. Description of Threat**

Primary threat is from fire, or contact with chemicals and biological waste.

## **III. RESPONSE INFORMATION:**

### **A. Current Situation**

Bids sent out for disposal of drummed wastes. ERRS continues to bulk-out non-haz wood debris. Removal activities in Bldg #2 continue on upper floor, consisting of gathering hair and spilled chemicals and bulking same for disposal. Demolition of out-buildings and the entire Main Building completed on 8/14. Disposal of scrap metal for recycling began on 8/15.

### **B. Actions Taken**

ERRS continues to bulk non-contaminated wood debris and old pallets into roll-offs for disposal.

Civil Investigator Coakley (PSB) on-site for 2 days reviewing records in office area of site.

ERRS bulked 14 55-gallon drums of hydraulic oil from elevator oil reservoir for disposal

ERRS loaded 26 pallets of scrap leather onto truck for recycling,

ERRS bulked a total of 107 poly drums of biowaste from floor and smaller containers, including animal hair, body parts (tails/feet), and fleshings. Roll-off that was filled with biowaste is now empty, will be deconed with bleach solution prior to filling with wood debris and returned to the carter.

ERRS bulked 187 drums of animal hair from biowaste area.

Bids for building demolition returned from subcontractors reviewed. OSC determined that it would be less costly for ERRS to do the demolition, and as such subcontracting was not pursued.

Analytical results of sampling selected wood beams sold to recycler revealed no contamination.

- 3 -

Chemicals for on-site treatment of 15,000 gallons of contaminated process water arrived. Work will commence during week of 8/20.

Fiber and grain analysis of wood tumblers revealed the wood to be Redwood, and connecting bolts are made from Monel, a corrosion-resistant alloy of nickel and copper with a recycling value.

OSC, RM, and principal excavator operator met with City officials to review Demolition Plan and to ensure that all City concerns were addressed regarding demolition procedures, traffic control, dust control, etc.

Demolition of Main Building completed on 8/14. OSC worked with CD personnel on press release for event. Mayor and other City officials were on-site for brief ceremonial removal of first section of building. Also in attendance was an AP photographer, two TV stations, and two local newspaper reporters.

Analytical results of sampling approx. 100 linear feet of pipe insulation revealed it to be 50% Chrysotile form asbestos. Insulation was covered in plastic, wetted with surfactant, gently removed and double bagged for disposal.

Three roll-offs ( 30 tons) of scrap metal sent off site for recycling.

Analytical results of leather dust in baghouse revealed the material to be non-contaminated.

After cleaning debris from basement area in Bldg. #2, ERRS discovered sump pump connected to floor drain system. This was traced to a connection to the municipal sewer system below grade so it could not be seen from the outside. Discharge through connecting pipe was not monitored, so it is likely that untreated chromium residue is in the pipe.

### C. Key Issues

Key issues are the safe handling of biowaste located in both process buildings and the need for additional funding for the removal action. This **Special POLREP** will serve to document that the OSC is transferring funds from the Extramural Contingency costs to the RST and ERRS as follows: \$45,000 to RST and \$79,000 to ERRS for site mitigation.

### D. Next Steps

Continue removal of biowaste and debris from roll-off container in Bldg.#2.

Continue manual removal of gross contamination from basement floor drains in Bldg.#2.

Continue bulking non-contaminated wood debris and old pallets for disposal.

Begin on-site treatment of contaminated process wastewater, resubmit for analysis, and dispose via sewer to WWTP.

Prepare documentation for change to SOW and to request mitigation ceiling increase,

#### **IV. COST INFORMATION**

The following table presents information on estimated costs for the removal action:

	<u>Ceiling</u>	<u>Costs to Date</u>	<u>Remaining Project Funds</u>
ERRS	\$679,000	\$390,000	\$289,000
RST	\$ 59,000	\$ 40,000	\$ 19,000
EPA	-----	-----	-----
TOTAL	\$748,000	\$430,000	\$298,000

Percent of Ceiling Utilized to Date: 40%

Note: The above accounting of expenditure is an estimate based on figures known to the OSC at the time this report was written. The costs provided in this report are an estimate only and do not reflect a monetary figure that EPA may include in any claims for cost recovery.

#### **V. DISPOSITION OF WASTES:**

All biowaste material to be shipped for incineration.

Disposal of chemical containers TBD depending on individual chemical profiles.

Liquid wastes in on-site WWTP will be treated on-site and discharged to local WWTP in a one-time event..

Disposal of contaminated soil/sludge/wood TBD.

Approximately 6 cubic yards of baghouse dust from leather buffing processes to be sent to landfill as non-hazardous solid waste.

The asbestos-containing material may be solidified to a monolith with cement or disposed of in an approved landfill.

Final POLREP \_\_\_\_\_ Further POLREPS Forthcoming **XXX**

**AUGUST 23, 2001 EPA POLLUTION REPORT NO. 10**

U. S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION REPORT

DATE: 8/23/01

SUBJECT: Independent Leather Site, Gloversville, Fulton County, NY

FROM: Paul L. Kahn  
On-Scene Coordinator  
Response and Prevention Branch

TO: B. Sprague, 2 ERRD-RPB  
J. LaPadula, 2ERRD-NYRB  
J. Regna, 2ORC-NYCSFB  
R. Byrnes, 2OIG  
C. Kelley, 2RST  
Chf. M. Shafer, GFD  
S. Fitz-James, Hdqts. 5202G

J. Higgins, 2ERRD-RPB  
M Cervantes-Gross, 2CD  
R. Cahill, 2CD-PAT  
J. Daloia, 2RPB-ER  
M. McClean, NYSDEC R-5  
R. Ellis, Dir. GDPW

**POLREP No.:** Ten (10)

**I. BACKGROUND:**

SITE NO:	QW
Delivery Order No:	040
Response Authority:	CERCLA
NPL Status:	Non-NPL
Action Memo Approval Date	5/16/01
Start Date:	4/5/01
Mobilization Date :	4/6/01
Demobilization Date:	4/10/01
Remobilization Date	6/5/01
Completion Date:	TBD

**II. SITE INFORMATION:**

**A. Incident Category: CERCLA time-critical removal action**


**1. Site Description**

The Site is a defunct leather tannery consisting of two processing buildings and various out-buildings, located in a mixed residential/commercial area. It was abandoned in 1994 along with hundreds of drums of chemicals, including corrosives, metallic pigments, resins, acids,

U. S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION REPORT

DATE: 8/23/01

SUBJECT: Independent Leather Site, Gloversville, Fulton County, NY

FROM: Paul L. Kahn   
On-Scene Coordinator  
Response and Prevention Branch

TO: B. Sprague, 2 ERRD-RPB J. Higgins, 2ERRD-RPB  
J. LaPadula, 2ERRD-NYRB M Cervantes-Gross, 2CD  
J. Regna, 2ORC-NYCSFB R. Cahill, 2CD-PAT  
R. Byrnes, 2OIG J. Daloia, 2RPB-ER  
C. Kelley, 2RST M. McClean, NYSDEC R-5  
Chf. M. Shafer, GFD R. Ellis, Dir. GDPW  
S. Fitz-James, Hdqts.5202G

**POLREP No.:** Ten (10)

**I. BACKGROUND:**

SITE NO:	QW
Delivery Order No:	040
Response Authority:	CERCLA
NPL Status:	Non-NPL
Action Memo Approval Date	5/16/01
Start Date:	4/5/01
Mobilization Date :	4/6/01
Demobilization Date:	4/10/01
Remobilization Date	6/5/01
Completion Date:	TBD

**II. SITE INFORMATION:**

**A. Incident Category: CERCLA time-critical removal action**

**1. Site Description**

The Site is a defunct leather tannery consisting of two processing buildings and various out-buildings, located in a mixed residential/commercial area. It was abandoned in 1994 along with hundreds of drums of chemicals, including corrosives, metallic pigments, resins, acids,

lab chemicals, water-reactive solids, chromium solutions, and biowaste consisting of animal hair, skin fleshings, and small body parts.

The main building was in poor physical condition; the roof had collapsed in four places. Portions of first floor fell through to the basement, floors were sagging in many places, and bearing columns in the basement were deflected and split.

## **2. Description of Threat**

Primary threat now is chemical contamination and biological waste.

### **III. RESPONSE INFORMATION:**

#### **A. Current Situation**

Demolition of Main Building completed 8/14/01. ERRS continues to bulk-out non-haz wood debris. Removal activities in Bldg #2 on upper floor almost complete. Gross contamination and debris have been removed. Power washing of all surface to commence soon. Removal work continues on first floor and in the sealed biowaste room, consisting of gathering hair, animal parts, and chemicals. Disposal of scrap metal for recycling began on 8/15. Two additional areas of possible contamination were discovered by Bldg. #2. Former owner had discontinued use of Cayadutta Creek for disposal of tannery wastes with the advent of the CWA. However, rather than install a second WWTP for wastes from Bldg. #2, he apparently installed a sump system and illegally pumped floor drain wastes directly to main sewer lines from Gloversville to the County WWTP. Dilution factor was so great that the discharge was never detected in the WWTP. OSC and ERRS inspected the interior of sewer access manway and saw the illegal discharge point and as gross (chromium) contamination of manway to a depth of about 10 feet. Also discovered was the former underground settling chamber and outfall to the creek. The chamber was a device where the solid material settled and the liquid phase flowed over a weir and through the outfall into the creek. Samples have been taken of both areas for analysis.

#### **B. Actions Taken**

ERRS continues to bulk non-contaminated wood debris and old pallets into roll-offs for disposal.

ERRS bulked a total of 3 cubic yard boxes of biowaste from floors, including animal hair, body parts (tails/feet), and fleshings. Roll-off that was filled with biowaste was emptied onto floor and is now empty and decontaminated with bleach solution.

ERRS bulked a total of 187 drums of animal hair from biowaste area.

Board of Directors of County WWTP approved EPA request for one-time discharge of up to 15,000 gallons of contaminated wastewater, treated on-site to County discharge limits. An additional 25,000 gallons of non-contaminated water will be part of the discharge, for a total of 40,000 gallons of wastewater.

### **C. Key Issues**

Key issues are the safe handling of biowaste, contamination in sludge and dirt on basement floor of Main Bldg., the need for additional funding for the removal action, and the demolition of the boiler stack.

### **D. Next Steps**

Bulk biowaste and debris from roll-off, now staged on floor in Bldg.#2.

Continue manual removal of gross contamination from basement floor drains in Bldg.#2.

Removal of demolition debris to County landfill.

Power wash upper floor in Bldg. #2.

Begin on-site treatment of contaminated process wastewater, resubmit for analysis, and dispose via sewer to WWTP.

Prepare documentation for change to SOW and to request mitigation ceiling increase,

Investigate contamination of illegal sewer connection from Bldg. #2, and old settling tank near the creek.

Seal old settling tank outfall (5" dia. metal pipe) with hydraulic cement.

Sample interior of brick boiler stack for presence of dioxin prior to demolition.

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#### **IV. COST INFORMATION**

The following table presents information on estimated costs for the removal action:

	<u>Ceiling</u>	<u>Costs to Date</u>	<u>Remaining Project Funds</u>
ERRS	\$679,000	\$396,000	\$283,000
RST	\$ 59,000	\$ 41,000	\$ 18,000
EPA	-----	-----	-----
TOTAL	\$748,000	\$437,000	\$301,000

Percent of Ceiling Utilized to Date: 58%

**Note: The above accounting of expenditure is an estimate based on figures known to the OSC at the time this report was written. The costs provided in this report are an estimate only and do not reflect a monetary figure that EPA may include in any claims for cost recovery.**

#### **V. DISPOSITION OF WASTES:**

All biowaste material to be shipped for incineration.

Disposal of chemical containers TBD depending on individual chemical profiles.

Liquid wastes in on-site WWTP will be treated on-site and discharged to local WWTP in a one-time event..

Disposal of contaminated soil/sludge/wood TBD.

Approximately 6 cubic yards of baghouse dust from leather buffing processes to be sent to landfill as non-hazardous solid waste.

The asbestos-containing material may be solidified to a monolith with cement or disposed of in an approved landfill.

**Final POLREP \_\_\_\_\_ Further POLREPS Forthcoming XXX**

C.T. MALE ASSOCIATES, P.C.

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**SEPTEMBER 10, 2001 EPA POLLUTION REPORT NO. 11**

U. S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION REPORT

DATE: 9/10/01

SUBJECT: Independent Leather Site, Gloversville, Fulton County, NY

FROM: Paul L. Kahn  
On-Scene Coordinator  
Response and Prevention Branch

TO: B. Sprague, 2 ERRD-RPB  
J. LaPadula, 2ERRD-NYRB  
J. Regna, 2ORC-NYCSFB  
R. Byrnes, 2OIG  
C. Kelley, 2RST  
Chf. M. Shafer, GFD  
S. Fitz-James, Hdqts.5202G  
J. Higgins, 2ERRD-RPB  
M Cervantes-Gross, 2CD  
R. Cahill, 2CD-PAT  
J. Daloia, 2RPB-ER  
M. McClean, NYSDEC R-5  
R. Ellis, Dir. GDPW

**POLREP No.:** Eleven (11)

**I. BACKGROUND:**

SITE NO:	QW
Delivery Order No:	040
Response Authority:	CERCLA
NPL Status:	Non-NPL
Action Memo Approval Date	5/16/01
Start Date:	4/5/01
Mobilization Date :	4/6/01
Demobilization Date:	4/10/01
Remobilization Date	6/5/01
Completion Date:	TBD

**II. SITE INFORMATION:**

**A. Incident Category: CERCLA time-critical removal action**

**1. Site Description**

The Site is a defunct leather tannery consisting of two processing buildings and various out-buildings, located in a mixed residential/commercial area. It was abandoned in 1994 along with hundreds of drums of chemicals, including corrosives, metallic pigments, resins, acids,

lab chemicals, water-reactive solids, chromium solutions, and biowaste consisting of animal hair, skin fleshings, and small body parts. The main building was in poor physical condition and the roof had collapsed in four places. Portions of first floor fell through to the basement, floors were sagging in many places, and bearing columns in the basement were deflected and split.

## **2. Description of Threat**

Primary threat now is chemical contamination in basement where the Main Building was, and the underlying soil. Newly discovered threat is possible coal tar contamination from a adjacent property that was a former Niagara-Mohawk coal-gas plant and is now a State remedial site.

### **III. RESPONSE INFORMATION:**

#### **A. Current Situation**

Bldg #2 about 95% completed. As of 9/7 all drums of bio-waste (347) were shipped for disposal. The roll-off that contained biowaste was deconed and returned to its owner. The floors and walls have been power-washed with a disinfectant. The illegal sewer discharge from the in-plant sump has been disconnected and blind-flanged pending back-washing contamination from the sewer manhole and connecting pipe. Additional work remaining includes power washing floor drains, removal of sludge from an outside catch-basin, and disposal of sump/catchbasin/floor sweepings. Analytical of material suspected of coming from adjacent Ni-Mo coal-gas site has been received but not yet evaluated. OSC will contact ORC for advice on how to proceed if analytical data are consistent with constituents of coal gas residue found at the Gloversville Ni-Mo site.

Disposal of debris that was the Main Building began on 9/10. It is anticipated that debris removal will take 7-10 days.

Action memo changing SOW and increasing project ceiling approved. PR signed on 9/10 for additional \$700,000 in ERRS mitigation funding.

Liquid chromium wastes in the on-site treatment plant have been treated to precipitate Cr<sup>+</sup>, Zn and Cu<sup>+</sup> in preparation for a one-time discharge to the county WWTP.

Samples of soot from boiler stack acquired for metals and dioxins analysis in preparation for stack demolition; analytical due back week of 9/10.

#### **B. Actions Taken**

ERRS bulking non-haz building debris into 65 cu. yd. trucks.

ERRS bulked total of 347 drums of animal hair, body parts, and fleshings. Biowaste roll-off was emptied, deconed with bleach solution, and returned to owner.

ERRS treated 15,000 gallons of contaminated wastewater on-site to County discharge limits. ✓ An additional 25,000 gallons of non-contaminated water will be part of the discharge to the county WWTP, for a total of 40,000 gallons of wastewater. After discharge the precipitated sludge will be dried with lime and bulked for disposal. The remaining non-contaminated sludge will be mixed with lime and clean dirt and used to backfill excavation during site restoration.

RST generated detailed site maps of both Bldg. #1 and #2 which documented the location of the sump/floor drain systems in both buildings, as well as other areas/objects that were contaminated

Waste profiles and RFPs completed for the 256 drums of chemicals bulked from both buildings and PCB-fluids in two on-site transformers.

REAC completed draft sampling plan for Main Building basement and surrounding soil, and for soil on east side of Cayadutta Creek.

Site digital images and selected site records transferred to CDs.

### **C. Key Issues**

Key issues are the disposal of demolition debris, clearing basement floor to begin accessing floor drains, drilling core samples in sub-soil, and demolition of boiler stack (possible dioxin contamination). If dioxin levels are too dangerous to allow for the stack to be demolished using a crane and wrecking ball, OSC will review options for a less violent method for bringing down the stack.

### **D. Next Steps**

Continue bulking demolition debris for disposal at county landfill

Complete power washing basement floor drains in Bldg. #2.

Begin one-time discharge of treated process wastewater to county WWTP.

Remove gross contamination from sewer manhole behind Bldg. #2 and back-wash connecting discharge pipe from building.

Remove sludge/liquid from catch-basin between Cayadutta Creek and Bldg. #2..

Bulk-out and ship for disposal contents of two remaining storage tanks that were part of the in-plant process waste treatment system..

Review all outstanding analytical data and continue site ops according to results.

#### IV. COST INFORMATION

The following table presents information on estimated costs for the removal action:

	<u>Ceiling</u>	<u>Costs to Date</u>	<u>Remaining Project Funds</u>
ERRS	\$679,000	\$529,000	\$ 70,000
RST	\$ 59,000	\$ 53,000	\$ 6,000
EPA	-----	-----	-----
TOTAL	\$748,000	\$582,000	\$ 76,000

Percent of Ceiling Utilized to Date: 85%

Note: The above accounting of expenditure is an estimate based on figures known to the OSC at the time this report was written. The costs provided in this report are an estimate only and do not reflect a monetary figure that EPA may include in any claims for cost recovery.

#### V. DISPOSITION OF WASTES:

All biowaste was shipped for incineration.

Disposal of chemical containers TBD depending on individual chemical profiles.

Liquid wastes in on-site WWTP will be treated on-site and discharged to local WWTP in a one-time event..

Disposal of contaminated soil/sludge/wood TBD.

Approximately 6 cubic yards of baghouse dust from leather buffing processes to be sent to landfill as non-hazardous solid waste.

The asbestos-containing material may be solidified to a monolith with cement or disposed of in an approved landfill.

Final POLREP \_\_\_\_\_ Further POLREPS Forthcoming XXX

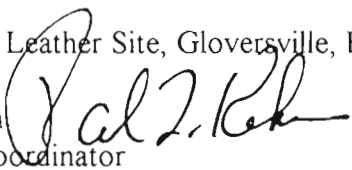
**SEPTEMBER 28, 2001 EPA POLLUTION REPORT NO. 12**

RST

U. S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION REPORT

DATE: 9/28/01

SUBJECT: Independent Leather Site, Gloversville, Fulton County, NY

FROM: Paul L. Kahn   
On-Scene Coordinator  
Response and Prevention Branch

TO: B. Sprague, 2 ERRD-RPB J. Higgins, 2ERRD-RPB  
J. LaPadula, 2ERRD-NYRB M Cervantes-Gross, 2CD  
J. Regna, 2ORC-NYCSFB R. Cahill, 2CD-PAT  
R. Byrnes, 2OIG J. Daloia, 2RPB-ER  
C. Kelley, 2RST M. McClean, NYSDEC R-5  
Chf. M. Shafer, GFD R. Ellis, Dir. GDPW  
S. Fitz-James, Hdqts.5202G

POLREP No.: Twelve (12)

**I. BACKGROUND:**

SITE NO:	QW
Delivery Order No:	040
Response Authority:	CERCLA
NPL Status:	Non-NPL
Action Memo Approval Date	5/16/01
Start Date:	4/5/01
Mobilization Date :	4/6/01
Demobilization Date:	4/10/01
Remobilization Date	6/5/01
Completion Date:	TBD

**II. SITE INFORMATION:**

**A. Incident Category: CERCLA time-critical removal action**

**1. Site Description**

The Site is a defunct leather tannery consisting of two processing buildings and various out-buildings, located in a mixed residential/commercial area. It was abandoned in 1994 along with hundreds of drums of chemicals, including corrosives, metallic pigments, resins, acids,



lab chemicals, water-reactive solids, chromium solutions, and biowaste consisting of animal hair, skin fleshings, and small body parts. The main building was in poor physical condition and the roof had collapsed in four places. Portions of first floor fell through to the basement. floors were sagging in many places, and bearing columns in the basement were deflected and split.

## **2. Description of Threat**

Primary threat now is chemical contamination in the basement where the Main Building was, and the underlying soil. Newly discovered threat is possible coal tar contamination from a adjacent property that was a former Niagara-Mohawk coal-gas plant and is now a State remedial site.

## **III. RESPONSE INFORMATION**

### **A. Current Situation**

Bldg #2 is 99% completed. Remaining work includes removal of sludge from an outside catch-basin and disposal of floor sweepings. Analytical of material suspected of coming from adjacent Ni-Mo coal-gas site has been received and appears to be chemically similar to the polycyclic aromatics typically in coal tar-like material (anthracene, pyrene etc.). OSC will contact ORC for advice on how to proceed with regards to contacting the adjacent Niagara Mohawk coal-gas remedial site, the suspected source of this contamination.

Disposal of debris that was the Main Building completed; 147 tandem trucks were loaded with C & D debris which was disposed of at the county landfill.

Procurement Request for ceiling increase and change in SOW approved, additional \$700,000 obligated mitigation funding.

Liquid chromium wastes in the on-site treatment plant treated to reduce levels of heavy metals, were discharged to the sanitary sewer at a controlled rate at <150 GPM. Approx. 25,000 gallons have been discharged.; the remaining 15,000 gallons are high in Se and have been re-tested to confirm Se levels. If Se level is too high for on-site treatment, this waste stream will be pumped out with the underlying sludge layer for disposal.

Samples of soot from boiler stack acquired for metals analysis shows no elevated levels of regulated metals, VOAs or SVOAs. Dioxin test was inadvertently not run, but lab has sufficient sample left to do low resolution scan (ppb range) for dioxin. Contingency plans in place to decon stack lining if dioxins are present. Absent any dioxins, stack demolition and removal of boilers scheduled for week of 10/5.

## **B. Actions Taken**

ERRS bulked total of 147 trucks of building debris.

ERRS discharged 25,000 gallons of non-contaminated water to county sanitary sewer. Remaining contaminated sludge will be dewatered and bulked for disposal.

RST generated updated site maps of both Bldg. #1 and #2, and worked with ERT/REAC on a draft site sampling plan for soil and sub-floor in Main Bldg.. RST forwarded copy of draft plan to C.T. Male, technical consultants to the DEC/City of Gloversville.

ERRS cleared trees and brush from banks of Cayadutta Creek to locate hidden outfalls.

ERRS T & D department continues to work on disposal arrangements for 256 drums of chemicals staged on site. Arrangements finalized for shipping two PCB-containing transformers off site for disposal during week of 10/1.

Approx. 5,000 gallons of chrom-contaminated liquid removed from Tanks 16 & 17 and shipped to DuPont (NJ) for disposal. Remaining sludge will be tested and if non-haz will be bulked with other non-haz sludge, mixed with clean dirt, and used as backfill.

## **C. Key Issues**

Key issues now are the demolition of the smoke stack, clearing the basement floor to begin accessing floor drains and sumps, and drilling core samples in sub-soil. If dioxin levels in stack are too dangerous, ERRS will decon interior of stack with commercial treatment product.

## **D. Next Steps**

Continue bulking small amounts of demolition debris for disposal at county landfill

Dewater sludge in WWTP and remove; power-wash empty chambers.

Remove gross contamination from sewer manhole behind Bldg. #2 and back-wash connecting discharge pipe from building.

Remove sludge/liquid from catch-basin between Cayadutta Creek and Bldg. #2.

Demolish smoke stack.

Bulk-out and ship for disposal remaining sludge in two remaining storage tanks that were part of the in-plant process waste treatment system.

Review all outstanding analytical data and continue site ops according to results.

#### IV. COST INFORMATION

The following table presents information on estimated costs for the removal action:

	<u>Ceiling</u>	<u>Costs to Date</u>	<u>Remaining Project Funds</u>
ERRS	\$1,300,000	\$666,000	\$634,000
RST	\$ 56,000	\$ 55,000	\$ 1,000
EPA	-----	-----	-----
TOTAL	\$1,356,000	\$721,000	\$635,000

Percent of Ceiling Utilized to Date: 51%

Note: The above accounting of expenditure is an estimate based on figures known to the OSC at the time this report was written. The costs provided in this report are an estimate only and do not reflect a monetary figure that EPA may include in any claims for cost recovery.

#### V. DISPOSITION OF WASTES:

All biowaste was incinerated.

Disposal of chemical containers TBD depending on individual chemical profiles.

Liquid wastes in on-site WWTP have been treated to applicable standards and discharged to county sanitary sewer in a one-time event.

Disposal of contaminated soil/sludge/wood TBD.

Approximately 6 cubic yards of baghouse dust from leather buffing processes sent to landfill as non-hazardous solid waste.

Asbestos-containing material may be solidified to a monolith with cement or disposed of in an approved landfill.

Final POLREP \_\_\_\_\_

Further POLREPS Forthcoming XXX

**DECEMBER 7, 2001 EPA POLLUTION REPORT NO. 13**

U. S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION REPORT

DATE: 12/7/01

SUBJECT: Independent Leather Site, Gloversville, Fulton County, NY

FROM: Paul L. Kahn  
On-Scene Coordinator  
Response and Prevention Branch

TO:	B. Sprague, 2 ERRD-RPB	J. Higgins, 2ERRD-RPB
	J. LaPadula, 2ERRD-NYRB	M Cervantes-Gross, 2CD
	J. Regna, 2ORC-NYCSFB	R. Cahill, 2CD-PAT
	R. Byrnes, 2OIG	J. Daloia, 2RPB-ER
	C. Kelley, 2RST	M. McClean, NYSDEC R-5
	Chf. M. Shafer, GFD	R. Ellis, Dir. GDPW
	S. Fitz-James, Hdqts.5202G	

**POLREP No.:** Thirteen (13)

**I. BACKGROUND:**

SITE NO:	QW
Delivery Order No:	040
Response Authority:	CERCLA
NPL Status:	Non-NPL
Action Memo Approval Date	5/16/01
Start Date:	4/5/01
Mobilization Date :	4/6/01
Demobilization Date:	11/30/01
Remobilization Date	TBD
Completion Date:	TBD

**II. SITE INFORMATION:**

**A. Incident Category: CERCLA time-critical removal action**

**1. Site Description**

The Site is a defunct leather tannery consisting of two processing buildings and various out-buildings, located in a mixed residential/commercial area. It was abandoned in 1994 along with hundreds of drums of chemicals, including corrosives, metallic pigments, resins, acids,

lab chemicals, water-reactive solids, chromium solutions, and biowaste consisting of animal hair, skin fleshings, and small body parts. The main building was in poor physical condition and the roof had collapsed in four places. Portions of first floor fell through to the basement, floors were sagging in many places, and bearing columns in the basement were deflected and split.

## **2. Description of Threat**

Primary threat is from residual contamination in soil.

### **III. RESPONSE INFORMATION:**

#### **A. Current Situation**

Site is now demobed for the winter. All chemicals have been transported off site for disposal. The on-site waste water treatment plant has been emptied and residual sludge bulked and transported off site for disposal.

Remaining building has been secured with plywood sheeting over doors and lower windows.

OSC has met with Dir. of the DPW and briefed him on the status of the Site.

#### **B. Actions Taken**

ERRS disposed of all remaining demolition debris at landfill and shipped the last 86 drums of bulked waste off-site for disposal.

All lower windows and doorways in remaining building have been secured with plywood.

Entire floor area of basement of main manufacturing building and remaining foundation walls were covered with visqueen to prevent snow melt from carrying contamination into Cayadutta Creek.

Gloversville PD agreed to make rounds by the Site on periodic basis.

#### **C. Key Issues**

Key issue is remediation of soil at the site. Based on sampling results, the extent of any remediation effort will be determined and appropriate measures undertaken when ERRS crew remobes to Site in the Spring.

#### **D. Next Steps**

Remobe crew in Spring and remediate soil to appropriate levels to be determined by OSC.  
Excavate soil to the extent necessary, remove remaining concrete walls and basement floor,  
and back-fill excavated area with clean fill.

#### **IV. COST INFORMATION**

The following table presents information on estimated costs for the removal action:

	<u>Ceiling</u>	<u>Costs to Date</u>	<u>Remaining Project Funds</u>
<b>ERRS</b>	\$1,800,000	\$950,000	\$750,000
<b>RST</b>	\$ 56, 000	\$ 56,000	\$ —
<b>EPA</b>	-----	-----	-----
	-----	-----	-----
<b>TOTAL</b>	\$1,856,000	\$1,006,000	\$750,000

Percent of Ceiling Utilized to Date: 42%

**Note: The above accounting of expenditure is an estimate based on figures known to the OSC at the time this report was written. The costs provided in this report are an estimate only and do not reflect a monetary figure that EPA may include in any claims for cost recovery.**

#### **V. DISPOSITION OF WASTES:**

All biowaste disposed of by incineration.

Disposal of chemical waste streams by incineration.

Liquid wastes in on-site WWTP have been treated to applicable standards and discharged to county sanitary sewer in a one-time event.

Disposal of contaminated soil/sludge/wood sent to Fulton County Landfill.

Approximately 6 cubic yards of baghouse dust from leather buffing processes sent to Fulton County Landfill as non-hazardous solid waste.

Asbestos-containing material sent to permitted Fulton County Landfill.

**Final POLREP \_\_\_\_\_ Further POLREPS Forthcoming XXX**

C.T. MALE ASSOCIATES, P.C.

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**MAY 17, 2002 EPA POLLUTION REPORT NO. 14**



**U. S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION REPORT**

**DATE:** 5/17/02

**SUBJECT:** Independent Leather Site, Gloversville, Fulton County, NY

**FROM:** Paul L. Kahn, On-Scene Coordinator *Bruce Berguelet*  
Response and Prevention Branch

**TO:**

B. Sprague, 2 ERRD-RPB	J. Higgins, 2ERRD-RPB
J. LaPadula, 2ERRD-NYRB	P. Carr 2CD-POB
J. Regna, 2ORC-NYCSFB	R. Cahill, 2CD-PAT
R. Byrnes, 2OIG	J. Daloia, 2ERRD-RPB
C. Kelley, 2RST	McClean, NYSDEC R-5
Chf. M. Shafer, GFD	R. Ellis, Dir. GDPW
T. Riverso, 2OPM-GCMB	R. Manna, 2OPM-FMB
R. Worley, Hdqts.5202G	

**POLREP No.:** 14

**I. BACKGROUND:**

SITE NO:	QW
Delivery Order No:	040
Response Authority:	CERCLA
NPL Status:	Non-NPL
Action Memo Approval Date	5/16/01
Start Date:	4/5/01
Mobilization Date :	4/6/01
Demobilization Date:	4/10/01
Remobilization Date	5/13/02
Completion Date:	TBD

**II. SITE INFORMATION:**

**A. Incident Category: CERCLA time-critical removal action**

**1. Site Description:**

The Site is a defunct leather tannery consisting of two processing buildings and various out-buildings, located in a mixed residential/commercial area. It was abandoned in 1994, along with hundreds of drums of chemicals, including corrosives, metallic pigments, resins, acids, lab chemicals, water-reactive solids, chromium solutions and biowaste consisting of animal hair, skin fleshings and small body parts.

The main building was in poor physical condition and the roof had collapsed in four places. Portions of the first floor fell through to the basement, the floors were sagging in many places and bearing columns in the basement were deflected and split. The building was demolished over the summer of 2001.

**2. Description of Threat:**

Primary threat was from fire, contact with chemicals and biological waste.

**III. RESPONSE INFORMATION:**

**A. Current Situation:**

ERRS crew remobilized to Site on 5/13/02 to complete removal action.

**B. Actions Taken:**

ERRS power-washed interior of former WWTP and began final demolition of the remnants of the WWTP and concrete foundation walls. Accumulated chromium deposits scraped off foundation wall and bagged for disposal. Roll-off delivered to the Site for collection of remaining scrap metal and wood debris, old pallets, etc. Efforts underway to contact recyclers for the remaining approximately 300 tons of concrete on-site.

**C. Key Issues:**

Key issues are the removal of remaining concrete WWTP and foundation walls, remaining scrap metal and restoration of the banks of Cayadutta Creek which were inadvertently damaged during the removal action and digging exploratory trenches where GPR indicated anomaly that could be buried drums.

**D. Next Steps:**

Continue removal of concrete, scrap metal and wood debris.

Obtain information on soil profile and compaction densities and begin to order appropriate types of back-fill for excavated area.

Issue RFP for reconstruction of damaged areas of creek banks.

**IV. COST INFORMATION:**

The following table presents information on estimated costs for the removal action:

	<u>Ceiling</u>	<u>Costs to Date</u>	<u>Remaining Project Funds</u>
ERRS	\$ 679,000	\$390,000	\$289,000
RST	\$ 59,000	\$ 40,000	\$ 19,000
EPA	-----	-----	-----
	-----	-----	-----
<b>TOTAL</b>	<b>\$748,000</b>	<b>\$430,000</b>	<b>\$298,000</b>

Percent of Ceiling Utilized to Date: 40%

**Note: The above accounting of expenditure is an estimate based on figures known to the OSC at the time this report was written. The costs provided in this report are an estimate only and do not reflect a monetary figure that EPA may include in any claims for cost recovery.**

**V. DISPOSITION OF WASTES:**

TBD

Final POLREP \_\_\_\_\_ Further POLREPS Forthcoming XXX

C.T. MALE ASSOCIATES, P.C.


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**MAY 24, 2002 EPA POLLUTION REPORT NO. 15**

U. S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION REPORT

DATE: 5/24/02

SUBJECT: Independent Leather Site, Gloversville, Fulton County, NY

FROM:  Paul L. Kahn  
On-Scene Coordinator  
Response and Prevention Branch



TO: B. Sprague, 2 ERRD-RPB  
J. LaPadula, 2ERRD-NYRB  
J. Regna, 2ORC-NYCSFB  
R. Byrnes, 2OIG  
C. Kelley, 2RST  
Chf. M. Shafer, GFD  
T. Rivero, 2OPM/GCMB  
R. Worley, HQ, 5202G

J. Higgins, 2ERRD-RPB  
P. Carr, 2CD-POB  
R. Cahill, 2CD-PAT  
J. Daloia, 2RPB-ER  
M. McClean, NYSDEC R-5  
R. Ellis, Dir. GDPW  
R. Manna, 2OPM/FMB

**POLREP No.: 15**

**I. BACKGROUND:**

SITE NO:	QW
Delivery Order No:	040
Response Authority:	CERCLA
NPL Status:	Non-NPL
Action Memo Approval Date	5/16/01
Start Date:	4/05/01
Mobilization Date :	4/06/01
Demobilization Date:	4/10/01
Remobilization Date	5/13/02
Completion Date:	TBD

**II. SITE INFORMATION:**

**A. Incident Category: CERCLA time-critical removal action**

**1. Site Description**

The Site is a defunct leather tannery, consisting of two processing buildings and various out-buildings, located in a mixed residential/commercial area. It was abandoned in 1994 along with hundreds of drums of chemicals, including corrosives, metallic pigments,

resins, acids, lab chemicals, water-reactive solids, chromium solutions, and biowaste consisting of animal hair, skin fleshings, and small body parts.

The main building was in poor physical condition; the roof had collapsed in four places. Portions of first floor fell into the basement, the floors were sagging in many places, and wooden load-bearing columns in the basement were deflected and split.

## **2. Description of Threat**

Primary threat was from fire, contact with chemicals, and biological waste.

### **III. RESPONSE INFORMATION:**

#### **A. Current Situation**

ERRS crew remobilized to Site on 5/13/02 to complete removal action.

#### **B. Actions Taken**

ERRS completed demolition of the remnants of the WWTP and concrete foundation walls. Approximately 400 tons of clean concrete will be sent to local firm which will use it for construction fill at a cost to EPA of \$110 per roll-off, instead of it going to the County landfill at a cost of \$46 a ton (tipping fee) + shipping.

Three roll-offs for the remaining scrap metal, including the two former above-ground storage tanks and "I" beams from the remains of two old bridges across the Cayadutta Creek, have been shipped off-site for recycling.

City of Gloversville has kindly provided dump trucks and drivers (at no cost to EPA) to haul wood debris cleared from the Site. This material will be chipped at the County landfill and used for mulch.

ERRS has contracted with a local supplier of clean dirt for delivery of 13,000 cubic yards of backfill from a natural land formation being cleared for a cemetery. The cost to EPA will be about \$20,000 less than the deal offered by the County landfill to provide us with clean fill.

A small (300 gallon) UST was discovered buried in the ground behind the foundation wall. This tank extended about 8 feet towards S. Main St., and its removal may have compromised the integrity of a section of the adjacent sidewalk. After conferring with the DPW Director, it was decided to remove the tank and the City would repair the sidewalk if it collapsed. Removal of the tank will occur after 1) its contents have been removed, and 2) when the dirt arrives so the void can be immediately backfilled.

C. Key Issues

Key issues are the disposal of stockpiles of concrete, stones, and remaining C & D debris, removal of the UST, placement/compaction of backfill, excavation of small area of contaminated soil, repairs to creek banks, and exploratory trenching in delineated areas where there may be buried drums.

D. Next Steps

Continue disposal of concrete, scrap metal, C & D and wood debris in preparation for backfilling excavated area.

Excavate small area of contaminated soil and send out RFPs for disposal.

Clearing off the concrete floor (cap) and commence back-fill of excavated area.

Begin reconstruction of damaged areas of creek banks.

Move \$200 K from Contingency account into Mitigation Account

Run exploratory trenches in designated areas.

Complete survey of Site by C.T. Male, Inc.

IV. COST INFORMATION

The following table presents information on estimated costs for the removal action:

	<u>Ceiling</u>	<u>Costs to Date</u>	<u>Remaining Project Funds</u>
ERRS	\$1,379,000	\$1,135,000	\$165,000
RST	\$ 59,000	\$ 48,000	\$ 11,000
EPA	----	----	----
TOTAL	<u>\$1,438,000</u>	<u>\$1,183,000</u>	<u>\$176,000</u>

Percent of Ceiling Utilized to Date: 86%

**Note: The above accounting of expenditure is an estimate based on figures known to the OSC at the time this report was written. Costs provided in this report are an estimate only and do not reflect a monetary figure that EPA may include in any claims for cost recovery.**

V. DISPOSITION OF WASTES:

Scrap metal.....recycling  
Concrete.....construction fill  
Clean wood, tree.....chipping for mulch  
Contaminated soil.....TBD  
C & D debris.....Landfill

Final POLREP \_\_\_\_\_ Further POLREPS Forthcoming XXX



**JUNE 1, 2002 EPA POLLUTION REPORT NO. 16**

**U. S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION REPORT**

**DATE:** 6/1/02

**SUBJECT:** Independent Leather Site, Gloversville, Fulton County, NY

**FROM:** Paul L. Kahn  
On-Scene Coordinator  
Response and Prevention Branch

**TO:** B. Sprague, 2 ERRD-RPB  
J. LaPadula, 2ERRD-NYRB  
J. Regna, 2ORC-NYCSFB  
R. Byrnes, 2OIG  
C. Kelley, 2RST  
Chf. M. Shafer, GFD  
T. Rivero, 2OPM/GCMB  
S. Fitz-James, Hdqts.5202G

J. Higgins, 2ERRD-RPB  
P. Carr 2CD-POB  
R. Cahill, 2CD-PAT  
J. Daloia, 2RPB-ER  
M. McClean, NYSDEC R-5  
R. Ellis, Dir. GDPW  
R. Manna, 2OPM/FMB

**POLREP No.:** 16

**I. BACKGROUND:**

SITE NO:	QW
Delivery Order No:	040
Response Authority:	CERCLA
NPL Status:	Non-NPL
Action Memo Approval Date	5/16/01
Start Date:	4/5/01
Mobilization Date :	4/6/01
Demobilization Date:	4/10/01
Remobilization Date	5/13/02
Completion Date:	TBD

**II. SITE INFORMATION:**

**A. Incident Category:** CERCLA time-critical removal action

**1. Site Description**

The Site is a defunct leather tannery, consisting of two processing buildings and various out-buildings, located in a mixed residential/commercial area. It was abandoned in 1994 along with hundreds of drums of chemicals, including corrosives, metallic pigments, resins, acids,

- 2 -

lab chemicals, water-reactive solids, chromium solutions, and biowaste consisting of animal hair, skin fleshings, and small body parts.

The main building was in poor physical condition; the roof had collapsed in four places. Portions of first floor fell into the basement, the floors were sagging in many places, and wooden load-bearing columns in the basement were deflected and split.

## **2. Description of Threat**

Primary threat was from fire, contact with chemicals, and biological waste.

## **III. RESPONSE INFORMATION:**

### **A. Current Situation**

ERRS crew remobilized to Site on 5/13/02 to complete removal action.

### **B. Actions Taken**

ERRS completed demolition of the remnants of the WWTP and concrete foundation walls. To date almost 500 tons of clean concrete has been sent to local firm which will use it for construction fill.

Total of five roll-offs of scrap metal been shipped off-site for recycling.

All brush, downed trees, and clean wood pallets taken to County landfill and chipped for mulch.

Backfilling of site will commence on 6/1 when the first of approx. 300 trucks of fill will arrive.

Consultants for City, C.T. Male, completed engineering survey of site in order to document location and depth of concrete pad, WWTP walls, and other prominent physical features of Site for use in subsequent commercial development activities.

Exploratory trenching of areas where GPR identified metallic anomalies revealed no buried drums or tanks. Efforts uncovered numerous metallic objects, including the remains of wooden tank straps, chain-links from a conveyor, liquid valves, and old fuel oil advertising signs. In addition it was noted that there are layers of what appears to be metal-bearing boiler slag from a coal-fired boiler, indicating that the area in question was a dump for previous businesses that operated at the Site.

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Deposits of white and red/brown chemicals uncovered during exploratory trenching have been sampled and bulked into ploy two drums. Disposal pending results of sample analysis.

The 750 gallon, riveted UST that was discovered buried behind the foundation wall was air-monitored for LEL, perforated, sampled, drained, and power-washed into a poly drum. Tank was crushed and bulked for recycling; disposal of contents pending results of sample analysis.

ERRS cleared dirt and rocks from areas of the Cayadutta Creek where mason will be repairing damage to creek banks.

M. McLean, DEC Region 5 Spill Response, visited Site with rep. from C.T. Male to view progress.

During the clearing of brush a pile of pulverized coal was discovered underneath. Efforts in progress to give coal away; absent any takers it will be sent to landfill for disposal.

#### **C. Key Issues**

Key issues are the disposal of remaining piles of concrete, rock and coal, placement/compaction of backfill, excavation of small area of contaminated soil, and repairs to creek banks.

#### **D. Next Steps**

Continue disposal of concrete.

Excavate small area of contaminated soil (50' X 100') and send out RFPs for disposal.

Clearing debris from concrete floor (cap) and commence back-fill and compaction of excavated area.

Begin reconstruction of damaged areas of creek banks.

Move \$200 K from Contingency account into Mitigation Account.

Prepare drainage system for underground spring located in middle of concrete floor (cap) to prevent subsequent undermining of backfill.

Issue bids for hydro-seeding of back-fill.

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**IV. COST INFORMATION**

The following table presents information on estimated costs for the removal action:

	<u>Ceiling</u>	<u>Costs to Date</u>	<u>Remaining Project Funds</u>
ERRS	\$1,300,000	\$1,164,000	\$136,000
RST	\$ 59,000	\$ 48,000	\$ 11,000
EPA	-----	-----	-----
TOTAL	\$1,359,000	\$1,212,000	\$147,000

Percent of Ceiling Utilized to Date: 90%

Note: The above accounting of expenditure is an estimate based on figures known to the OSC at the time this report was written. Costs provided in this report are an estimate only and do not reflect a monetary figure that EPA may include in any claims for cost recovery.

**V. DISPOSITION OF WASTES:**

Scrap metal.....recycling  
Concrete.....construction fill  
Clean wood, trees.....chipping for mulch  
Contaminated soil.....TBD  
C & D debris.....Landfill  
Chemicals.....TBD

Final POLREP \_\_\_\_\_

Further POLREPS Forthcoming XXX

C.T. MALE ASSOCIATES, P.C.

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**JUNE 8, 2002 EPA POLLUTION REPORT NO. SPECIAL #2**

U. S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION REPORT

**DATE:** 6/8/02

**SUBJECT:** Independent Leather Site, Gloversville, Fulton County, NY

**FROM:** Paul L. Kahn *B. Sprague/fnl*  
On-Scene Coordinator  
Response and Prevention Branch

**TO:** B. Sprague, 2 ERRD-RPB J. Higgins, 2ERRD-RPB  
J. LaPadula, 2ERRD-NYRB P. Carr 2CD-POB  
J. Regna, 2ORC-NYCSFB R. Cahill, 2CD-PAT  
R. Byrnes, 2OIG J. Daloia, 2ERRD-RPB  
C. Kelley, 2RST M. McClean, NYSDEC R-5  
Chf. M. Shafer, GFD R. Ellis, Dir. GDPW  
T. Rivero, 2OPM/GCMB R. Manna, 2OPM/FMB  
R. Worley, Hdqts.5202G

**POLREP No.:** SPECIAL #2

**I. BACKGROUND:**

SITE NO:	QW
Delivery Order No:	040
Response Authority:	CERCLA
NPL Status:	Non-NPL
Action Memo Approval Date	5/16/01
Start Date:	4/5/01
Mobilization Date :	4/6/01
Demobilization Date:	4/10/01
Remobilization Date	5/13/02
Completion Date:	TBD

**II. SITE INFORMATION:**

**A. Incident Category:** CERCLA time-critical removal action

**1. Site Description**

The Site is a defunct leather tannery, consisting of two processing buildings and various out-buildings, located in a mixed residential/commercial area. It was abandoned in 1994 with

-2-

hundreds of drums of chemicals, including corrosives, metallic pigments, resins, acids, lab chemicals, water-reactive solids, chromium solutions, and biowaste consisting of animal hair, skin fleshings, and small body parts.

The main building was in poor physical condition; the roof had collapsed in four places. Portions of first floor fell into the basement, floors were sagging in many places, and wooden load-bearing columns in the basement were deflected and split.

## **2. Description of Threat:**

Primary threat was from fire, contact with chemicals, and biological waste.

## **III. RESPONSE INFORMATION:**

### **A. Current Situation:**

ERRS crew remobilized to Site on 5/13/02 to complete removal action.

### **B. Actions Taken:**

675 tons of clean concrete has been sent to local firm for use as construction fill.

Back-filling Site began on 6/1 and concluded on 6/7. Total of 7,900 cu. yds. of fill were delivered and compacted with vibrating roller.

ERRS received bid for repairs to banks of the Cayadutta Creek. Cost is higher than expected; civil engineer to be mobed to site to provide EA/cost estimate for ERRS to do the repairs.

Consultants to the City have identified areas of the Site where arsenic was detected in percentage amounts. These appear to be "hot spots" and not widespread contamination over the entire 2+ acres of the Site. Meeting held on 6/7 with consultants to clarify situation with respect to future remedial activities.

After a meeting with the DPW Director, ERRS constructed a device to collect and channel water from a natural spring on the Site to the Cayadutta Creek. A septic system distribution box was placed over the head of the spring and then connected to 4" PVC pipe with a flexible elbow joint. This was laid on a 75' bed of crushed rock running to the creek. This should minimize under-erosion and possible slumping of back-fill.



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ERRS excavated a Cr "hot spot" area approx. 25' X 25' X 18", which was bulked into a lined roll-off pending disposal.

Two metal/porcelain Standard Oil Company of New York (SOCONY) advertising signs, circa 1920, were uncovered during exploratory trenching activities. Signs were cleaned and given to the Gloversville Historian. One sign will remain in Gloversville and the other will be given to the Fulton County Historical Society.

**C. Key Issues:**

Key issues are the disposal of remaining pile of coal, placement of top soil, hydro-seeding, excavation of small area of As contaminated soil, and repairs to creek banks.

This Special POLREP #2 will serve to document that the OSC is transferring \$200,000 of funds from Extramural Contingency costs to ERRS for site mitigation.

**D. Next Steps:**

Excavate "hot spot" area of As contaminated soil (50' X 50' X 2') and send out RFPs for disposal.

Begin reconstruction of damaged areas of creek banks.

Process PR to move \$200 K from Contingency funds to Mitigation funds.

Apply and compact 6 inches of top soil to back-filled area

Issue bids for hydro-seeding of back-fill.

Ship last roll-off of scrap metal for recycling.

Removal close-out meeting and walk-thru with City officials and other interested parties.

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**IV. COST INFORMATION:**

The following table presents information on estimated costs for the removal action:

	<u>Ceiling</u>	<u>Costs to Date</u>	<u>Remaining Project Funds</u>
ERRS	\$1,300,000	\$1,231,000	\$ 69,000
RST	\$ 59,000	\$ 48,000	\$ 11,000
EPA	----	----	----
	-----	-----	-----
TOTAL	\$1,359,000	\$1,279,000	\$ 80,000

Percent of Ceiling Utilized to Date: 95%

**Note:** The above accounting of expenditure is an estimate based on figures known to the OSC at the time this report was written. Costs provided in this report are an estimate only and do not reflect a monetary figure that EPA may include in any claims for cost recovery.

**V. DISPOSITION OF WASTES:**

Scrap metal.....recycled  
 Concrete.....construction fill  
 Clean wood, trees.....chipped for mulch  
 Cr contaminated soil.....land filled  
 As contaminated soil.....TBD  
 C & D debris.....land filled  
 Chemicals.....incinerated; neutralized  
 Used PPE, poly drums.....fuels blending

Final POLREP \_\_\_\_\_

Further POLREPS Forthcoming XXX

**JUNE 19, 2002 EPA POLLUTION REPORT NO. 17**

**U. S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION REPORT**

**DATE:** 6/19/02

**SUBJECT:** Independent Leather Site, Gloversville, Fulton County, NY

**FROM:** Paul L. Kahn  
On-Scene Coordinator  
Response and Prevention Branch

**TO:** B. Sprague, 2 ERRD-RPB  
J. LaPadula, 2ERRD-NYRB  
J. Regna, 2ORC-NYCSFB  
R. Byrnes, 2OIG  
C. Kelley, 2RST  
Chf. M. Shafer, GFD  
T. Rivero, 2OPM-GCMB  
R. Worley, Hdqts.5202G

J. Higgins, 2ERRD-RPB  
P. Carr 2CD-POB  
R. Cahill, 2CD-PAT  
J. Daloia, 2ERR-RPB-ERT  
M. McClean, NYSDEC R-5  
R. Ellis, Dir. GDPW  
R. Manna, 2OPM-FMB

**POLREP No.:** Seventeen (17)

**I. BACKGROUND:**

SITE NO:	QW
Delivery Order No:	040
Response Authority:	CERCLA
NPL Status:	Non-NPL
Action Memo Approval Date	5/16/01
Start Date:	4/5/01
Mobilization Date :	4/6/01
Demobilization Date:	4/10/01
Remobilization Date	5/13/02
Completion Date:	TBD

**II. SITE INFORMATION:**

**A. Incident Category:** CERCLA time-critical removal action

**1. Site Description:**

The Site is a defunct leather tannery, consisting of two processing buildings and various out-buildings, located in a mixed residential/commercial area. It was abandoned in 1994 with

-2-

hundreds of drums of chemicals, including corrosives, metallic pigments, resins, acids, lab chemicals, water-reactive solids, chromium solutions, and biowaste consisting of animal hair, skin fleshings, and small body parts.

The main building was in poor physical condition; the roof had collapsed in four places. Portions of first floor fell into the basement, floors were sagging in many places, and wooden load-bearing columns in the basement were deflected and split.

2. **Description of Threat:**

Primary threat was from fire, contact with chemicals and biological waste.

III. **RESPONSE INFORMATION:**

A. **Current Situation:**

ERRS crew remobilized to Site on 5/13/02 to complete removal action.

B. **Actions Taken:**

ERRS civil engineer designed simple cantilever-style repair for concrete/stone walls of creek. ERRS will undertake the actual repairs for 1/8th the cost quoted by mason subcontractor.

ERRS began removal of one arsenic "hot spot" in the soil on the east side of the Site. Approx. 40 cu. yds. of contaminated soil will be excavated and bulked for disposal as haz-waste. Composite samples will be sent for TCLP, and disposal options will be determined based on analytical results.

Non-haz Cr contaminated soil, previously bulked into a lined roll-off, was sent off-site for disposal at landfill.

Defunct outfalls from tannery were cut flush with walls of creek and filled with cement.

Coal pile prepared for bulking and disposal at landfill.

PR for additional \$200,000 for mitigation funding signed and hand-carried to NYC for processing.

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In lieu of subcontracting for hydroseeding, ERRS applied 50 bags of grass seed to top soil and covered it with straw used earlier in removal action as berm for drummed chemicals. For additional erosion control ERRS planted thirty 7' red maple trees.

**C. Key Issues:**

Key issues are the disposal As-contaminated soil and repairs to walls of creek banks.

**D. Next Steps:**

Begin reconstruction of damaged areas of walls of creek banks..

Disposal of As-contaminated soil

Removal close-out meeting and walk-thru with City officials and other interested parties.

**IV. COST INFORMATION:**

The following table presents information on estimated costs for the removal action:

	<u>Ceiling</u>	<u>Costs to Date</u>	<u>Remaining Project Funds</u>
ERRS	\$1,300,000	\$1,265,000	\$ 35,000
RST	\$ 59,000	\$ 48,000	\$ 11,000
EPA	-----	-----	-----
TOTAL	\$1,359,000	\$1,313,000	\$ 46,000

Percent of Ceiling Utilized to Date: 97%

**Note: The above accounting of expenditure is an estimate based on figures known to the OSC at the time this report was written. Costs provided in this report are an estimate only and do not reflect a monetary figure that EPA may include in any claims for cost recovery.**

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**V. DISPOSITION OF WASTES:**

Scrap metal.....recycled  
Concrete.....construction fill  
Clean wood, trees.....chipped for mulch  
Cr contaminated soil.....landfilled  
As contaminated soil.....TBD  
C & D debris.....landfilled  
Chemicals.....incinerated; neutralized  
Used PPE, poly drums.....fuels blending

**Final POLREP \_\_\_\_\_****Further POLREPS Forthcoming XXX**

C.T. MALE ASSOCIATES, P.C.

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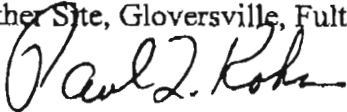
**JUNE 30, 2002 EPA POLLUTION REPORT NO. 18**



U. S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION REPORT

DATE: 6/30/02

SUBJECT: Independent Leather Site, Gloversville, Fulton County, NY

FROM: Paul L. Kahn   
On-Scene Coordinator  
Response and Prevention Branch

TO: B. Sprague, 2 ERRD-RPB J. Higgins, 2ERRD-RPB  
J. LaPadula, 2ERRD-NYRB P. Carr 2CD-POB  
J. Regna, 2ORC-NYCSFB R. Cahill, 2CD-PAT  
R. Byrnes, 2OIG J. Daloia, 2RPB-ER  
C. Kelley, 2RST M. McClean, NYSDEC R-5  
Chf. M. Shafer, GFD R. Ellis, Dir. GDPW  
T. Rivero, 2OPM/GCMB R. Manna, 2OPM/FMB  
S. Fitz-James, Hdqts.5202G

**POLREP No.:** Eighteen (18)

**I. BACKGROUND:**

SITE NO:	QW
Delivery Order No:	040
Response Authority:	CERCLA
NPL Status:	Non-NPL
Action Memo Approval Date	5/16/01
Start Date:	4/5/01
Mobilization Date :	4/6/01
Demobilization Date:	4/10/01
Remobilization Date	5/13/02
Completion Date:	TBD

**II. SITE INFORMATION:**

**A. Incident Category: CERCLA time-critical removal action**

**1. Site Description**

The Site is a defunct leather tannery, consisting of two processing buildings and various out-buildings, located in a mixed residential/commercial area. It was abandoned in 1994 with

hundreds of drums of chemicals, including corrosives, metallic pigments, resins, acids, lab chemicals, water-reactive solids, chromium solutions, and biowaste consisting of animal hair, skin fleshings, and small body parts.

The main building was in poor physical condition; the roof had collapsed in four places. Portions of first floor fell into the basement, floors were sagging in many places, and wooden load-bearing columns in the basement were deflected and split.

## **2. Description of Threat**

Primary threat was from fire, contact with chemicals and biological waste.

## **III. RESPONSE INFORMATION:**

### **A. Current Situation**

ERRS crew remobilized to Site on 5/13/02 to complete removal action.

### **B. Actions Taken**

ERRS civil engineer revisited Site to confer on design of footings and rebar configuration for concrete wall reconstruction along sections of Cayadutta Creek. Determination was made that plywood and dimensional lumber would suffice for footing forms, but it will be necessary to rent metal forms with metal bracing for pouring the walls. Rebar has been fabricated off-site. Decision was made to add a dye to the concrete to impart color to new sections so they will blend with weathered look of existing walls.

Analytical results from composite sampling of 40 yards of soil excavated from arsenic "hot spot" on the east side of the Site revealed ppm levels for arsenic at or below TAGM. Soil will be redeposited on-site and additional excavated soil, from deeper into the "hot spot" area, will replace that soil for disposal after TCLP is re-run.

Coal pile (approx. 35 cu yds) bulked and transported to Fulton County landfill.

As a result of diligent effort on the part of Lisa Guarneiri, ERRS DPO, additional \$135,000 for mitigation funding was transferred from Contingency to Mitigation.

### C. Key Issues

Key issues are the disposal As-contaminated soil and repairs to walls of creek banks.

### D. Next Steps

Continue reconstruction of damaged areas of walls of Cayadutta Creek.

Disposal of As-contaminated soil from "hot spot".

Removal close-out meeting and walk-thru with City officials and other interested parties.

## IV. COST INFORMATION

The following table presents information on estimated costs for the removal action:

	<u>Ceiling</u>	<u>Costs to Date</u>	<u>Remaining Project Funds</u>
ERRS	\$1,435,000*	\$1,320,000	\$ 115,000
RST	\$ 59,000	\$ 48,000	\$ 11,000
EPA	-----	-----	-----
TOTAL	\$1,494,000	\$1,313,000	\$ 126,000

Percent of Ceiling Utilized to Date: 92%\*

\*This number includes the additional \$135,000 just added to mitigation ceiling.

**Note: The above accounting of expenditure is an estimate based on figures known to the OSC at the time this report was written. Costs provided in this report are an estimate only and do not reflect a monetary figure that EPA may include in any claims for cost recovery.**

**V. DISPOSITION OF WASTES:**

Scrap metal.....recycled  
Concrete.....construction fill  
Clean wood, trees.....chipped for mulch  
Cr+3 contaminated soil ..landfilled  
As contaminated soil.....TBD  
C & D debris.....landfilled  
Chemicals.....incinerated; neutralized  
Used PPE, poly drums.....fuels blending  
Coal pile.....landfill

**Final POLREP \_\_\_\_\_**

**Further POLREPS Forthcoming XXX**

**JULY 23, 2002 EPA POLLUTION REPORT NO. 18**

U. S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION REPORT

DATE: 7/23/02

SUBJECT: Independent Leather Site, Gloversville, Fulton County, NY

FROM: Ellen Banner *Ellen Banner*  
On-Scene Coordinator  
Response and Prevention Branch

TO: B. Sprague, 2 ERRD-RPB J. Higgins, 2ERRD-RPB  
J. LaPadula, 2ERRD-NYRB P. Carr 2CD-POB  
J. Regna, 2ORC-NYCSFB R. Cahill, 2CD-PAT  
R. Byrnes, 2OIG J. Daloia, 2RPB-ER  
C. Kelley, 2RST M. McClean, NYSDEC R-5  
Chf. M. Shafer, GFD R. Ellis, Dir. GDPW  
T. Rivero, 2OPM/GCMB R. Manna, 2OPM/FMB  
S. Fitz-James, Hdqts.5202G

**POLREP No.:** Eighteen (18)

**I. BACKGROUND:**

SITE NO:	QW
Delivery Order No:	040
Response Authority:	CERCLA
NPL Status:	Non-NPL
Action Memo Approval Date	5/16/01
Start Date:	4/5/01
Mobilization Date :	4/6/01
Demobilization Date:	4/10/01
Remobilization Date	5/13/02
Completion Date:	TBD

**II. SITE INFORMATION:**

**A. Incident Category:** CERCLA time-critical removal action

**1. Site Description**

The Site is a defunct leather tannery, consisting of two processing buildings and various out-buildings, located in a mixed residential/commercial area. It was abandoned in 1994 with

hundreds of drums of chemicals, including corrosives, metallic pigments, resins, acids, lab chemicals, water-reactive solids, chromium solutions, and biowaste consisting of animal hair, skin fleshings, and small body parts.

The main building was in poor physical condition; the roof had collapsed in four places. Portions of first floor fell into the basement, floors were sagging in many places, and wooden load-bearing columns in the basement were deflected and split.

## **2. Description of Threat**

Primary threat was from fire, contact with chemicals and biological waste.

## **III. RESPONSE INFORMATION:**

### **A. Current Situation**

ERRS crew remobilized to Site on 5/13/02 to complete removal action.

### **B. Actions Taken**

ERRS civil engineer revisited Site to confer on design of footings and rebar configuration for concrete wall reconstruction along sections of Cayadutta Creek. Determination was made that plywood and dimensional lumber would suffice for footing forms, but it will be necessary to rent metal forms with metal bracing for pouring the walls. Rebar has been fabricated off-site. Decision was made to add a dye to the concrete to impart color to new sections so they will blend with weathered look of existing walls.

Analytical results from composite sampling of 40 yards of soil excavated from arsenic "hot spot" on the east side of the Site are currently under review. The results of two different TCLP analyses which resulted in very different results are being re-considered to determine if soil will be redeposited on-site or manifested off-site.

Coal pile (approx. 35 cu yds) bulked and transported to Fulton County landfill.

As a result of diligent effort on the part of Lisa.Guarneiri, ERRS DPO, additional \$135,000 for mitigation funding was transferred from Contingency to Mitigation.

**C. Key Issues**

Key issues are the disposal As-contaminated soil and repairs to walls of creek banks.

**D. Next Steps**

Continue reconstruction of damaged areas of walls of Cayadutta Creek.

Disposal of As-contaminated soil from "hot spot".

Removal close-out meeting and walk-thru with City officials and other interested parties.

**IV. COST INFORMATION**

The following table presents information on estimated costs for the removal action:

	<u>Ceiling</u>	<u>Costs to Date</u>	<u>Remaining Project Funds</u>
<b>ERRS</b>	\$1,435,000*	\$1,386,000	\$49,000
<b>RST</b>	\$ 59,000	\$ 48,000	\$11,000
<b>EPA</b>	—	---	—
	-----	-----	-----
<b>TOTAL</b>	\$1,494,000	\$1,434,000	\$60,000

Percent of Ceiling Utilized to Date: 96%\*

\*This number includes the additional \$135,000 just added to mitigation ceiling.

**Note: The above accounting of expenditure is an estimate based on figures known to the OSC at the time this report was written. Costs provided in this report are an estimate only and do not reflect a monetary figure that EPA may include in any claims for cost recovery.**

**On July 24, 2002, an additional \$85,000 procurement request was prepared, and with the remaining \$65,000 committed last month, the ERRS contractor will be given an additional \$150,000 to complete this removal.**



**V. DISPOSITION OF WASTES:**

Scrap metal.....recycled  
Concrete.....construction fill  
Clean wood, trees.....chipped for mulch  
Cr+3 contaminated soil ..landfilled  
As contaminated soil.....TBD  
C & D debris.....landfilled  
Chemicals.....incinerated; neutralized  
Used PPE, poly drums.....fuels blending  
Coal pile.....landfill

**Final POLREP \_\_\_\_\_ Further POLREPS Forthcoming XXX**

**AUGUST 12, 2002 EPA POLLUTION REPORT NO. 19**

U. S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION REPORT

DATE: 8/12/02

SUBJECT: Independent Leather Site, Gloversville, Fulton County, NY

FROM: Paul L. Kahn  
On-Scene Coordinator  
Response and Prevention Branch

TO: B. Sprague, 2 ERRD-RPB  
J. LaPadula, 2ERRD-NYRB  
J. Regna, 2ORC-NYCSFB  
R. Byrnes, 2OIG  
C. Kelley, 2RST  
Chf. M. Shafer, GFD  
T. Rivero, 2OPM/GCMB  
S. Fitz-James, Hdqts.5202G  
J. Higgins, 2ERRD-RPB  
P. Carr 2CD-POB  
R. Cahill, 2CD-PAT  
J. Daloia, 2RPB-ER  
M. McClean, NYSDEC R-5  
R. Ellis, Dir. GDPW  
R. Manna, 2OPM/FMB

**POLREP No.:** Ninteen (19)

**I. BACKGROUND:**

SITE NO:	QW
Delivery Order No:	040
Response Authority:	CERCLA
NPL Status:	Non-NPL
Action Memo Approval Date	5/16/01
Start Date:	4/5/01
Mobilization Date :	4/6/01
Demobilization Date:	4/10/01
Remobilization Date	5/13/02
Completion Date:	TBD

**II. SITE INFORMATION:**

**A. Incident Category:** CERCLA time-critical removal action

**1. Site Description**

The Site is a defunct leather tannery, consisting of two processing buildings and various out-buildings, located in a mixed residential/commercial area. It was abandoned in 1994 with

hundreds of drums of chemicals, including corrosives, metallic pigments, resins, acids, lab chemicals, water-reactive solids, chromium solutions, and biowaste consisting of animal hair, skin fleshings, and small body parts.

The main building was in poor physical condition; the roof had collapsed in four places. Portions of first floor fell into the basement, floors were sagging in many places, and wooden load-bearing columns in the basement were deflected and split.

## **2. Description of Threat**

Primary threat was from fire and contact with chemicals/biological waste.

## **III. RESPONSE INFORMATION:**

### **A. Current Situation**

ERRS crew on-site repairing sections of walls of Cayadutta Creek..

### **B. Actions Taken**

ERRS has completed repairs to four of seven sections of walls along Creek. Currently working on framing the footings for a 5<sup>th</sup> wall section and two bridge abutments.

Disposal approval received for two roll-offs of arsenic/lead-contaminated soil. Shipping to occur on 8/12.

Remains of a 20,000 gal. #6 oil tank were discovered when ERRS was preparing section of wall for repairs. The tank had been cut in half, longitudinally, at ground level, and the shell was filled with dirt. When ERRS attempted to remove the remains, water and oil began to seep into the shell. Spill pads and boom were deployed in the Creek as a contingency. The seepage was closely monitored, and eventually it stopped. The collected material was pumped into poly drums and sampled for disposal. The shell was then removed and staged on poly. Contaminated soil from underneath the tank was staged on poly and will be bulked into lined roll-offs for disposal. The oil-like material may be residual #6 oil, or it may be contamination migrating from the adjacent Niagara-Mohawk Coal Gasification State Superfund site. OSC notified C.T. Male, consultants to the City of Gloversville, of the situation and a rep visited the Site on 8/7 to confer with the OSC.

### C. Key Issues

Key issues are the disposal oil-contaminated soil and completing repairs to walls of Creek.

### D. Next Steps

Continue reconstruction of damaged sections of stone walls of Cayadutta Creek.

Disposal of oil-contaminated soil.

Removal close-out meeting and walk-thru with City officials and other interested parties, possible press event.

### IV. COST INFORMATION

The following table presents information on estimated costs for the removal action:

	<u>Ceiling</u>	<u>Costs to Date</u>	<u>Remaining Project Funds</u>
ERRS	\$1,585,000	\$1,444,000	\$ 141,000
RST	\$ 59,000	\$ 48,000	\$ 11,000
EPA	-----	-----	-----
TOTAL	\$1,644,000	\$1,492,000	\$ 152,000

Percent of Ceiling Utilized to Date: 92%

**Note: The above accounting of expenditure is an estimate based on figures known to the OSC at the time this report was written. Costs provided in this report are an estimate only and do not reflect a monetary figure that EPA may include in any claims for cost recovery.**

**V. DISPOSITION OF WASTES:**

Scrap metal.....recycled  
Concrete.....construction fill  
Clean wood, trees.....chipped for mulch  
Cr+3 contaminated soil ....landfilled  
As/Pb contaminated soil...stabilization/treatment/landfill  
C & D debris.....landfilled  
Chemicals.....incinerated; neutralized  
Used PPE, poly drums.....fuels blending  
Coal pile.....landfill  
Oil-contaminated soil.....TBD

**Final POLREP \_\_\_\_\_ Further POLREPS Forthcoming XXX**

**AUGUST 24, 2002 EPA POLLUTION REPORT NO. 20**

U. S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION REPORT

DATE: 8/24/02

SUBJECT: Independent Leather Site, Gloversville, Fulton County, NY

FROM: Paul L. Kahn  
On-Scene Coordinator  
Response and Prevention Branch

TO:	B. Sprague, 2 ERRD-RPB	J. Higgins, 2ERRD-RPB
	J. LaPadula, 2ERRD-NYRB	P. Carr 2CD-POB
	J. Regna, 2ORC-NYCSFB	R. Cahill, 2CD-PAT
	R. Byrnes, 2OIG	J. Daloia, 2RPB-ER
	C. Kelley, 2RST	M. McClean, NYSDEC R-5
	Chf. M. Shafer, GFD	R. Ellis, Dir. GDPW
	T. Rivero, 2OPM/GCMB	R. Manna, 2OPM/FMB
	S. Fitz-James, Hdqts.5202G	

**POLREP No.:** Twenty (20)

**I. BACKGROUND:**

SITE NO:	<b>QW</b>
Delivery Order No:	040
Response Authority:	CERCLA
NPL Status:	Non-NPL
Action Memo Approval Date	5/16/01
Start Date:	4/5/01
Mobilization Date :	4/6/01
Demobilization Date:	4/10/01
Remobilization Date	5/13/02
Completion Date:	TBD

**II. SITE INFORMATION:**

**A. Incident Category: CERCLA time-critical removal action**

**1. Site Description**

The Site is a defunct leather tannery, consisting of two processing buildings and various out-buildings, located in a mixed residential/commercial area. It was abandoned in 1994 with



hundreds of drums of chemicals, including corrosives, metallic pigments, resins, acids, lab chemicals, water-reactive solids, chromium solutions, and biowaste consisting of animal hair, skin fleshings, and small body parts.

The main building was in poor physical condition; the roof had collapsed in four places. Portions of first floor fell into the basement, floors were sagging in many places, and wooden load-bearing columns in the basement were deflected and split.

## **2. Description of Threat**

Primary threat was from fire and contact with chemicals/biological waste.

## **III. RESPONSE INFORMATION:**

### **A. Current Situation**

ERRS crew on-site repairing sections of walls of Cayadutta Creek..

### **B. Actions Taken**

ERRS has completed repairs to all wall sections Creek, and one of two abutments of the small bridge that spans the Creek.

Currently working on framing the footings for a 5<sup>th</sup> wall section and two bridge abutments.

Two roll-offs of arsenic/lead-contaminated soil sent off-site for disposal as scheduled on 8/12.

Remains of a 20,000 gal. #6 oil tank, discovered when ERRS was preparing section of wall for repairs, was cleaned, cut, and sent off site for metal recycling. New section of creek wall where tank was located was poured and excavation backfilled. Corners of UST pad were marked for future reference when redeveloping the property. Contaminated soil from underneath the tank was staged on poly and will be bulked into lined roll-offs for disposal.

Mayor of Gloversville and aide from Sen. Schumer's Albany office visited Site for brief discussion with OSC,

### **C. Key Issues**

Key issues are the disposal oil-contaminated soil and completing repairs to walls of Creek.

#### **D. Next Steps**

Complete reconstruction of remaining bridge abutment.

Disposal of oil-contaminated soil.

Final grading of a few backfilled areas and applying grass seed for erosion control.

Removal close-out meeting and walk-thru with City officials and other interested parties, possible press release to be arranged with Communications Division.

#### **IV. COST INFORMATION**

The following table presents information on estimated costs for the removal action:

	<u>Ceiling</u>	<u>Costs to Date</u>	<u>Remaining Project Funds</u>
<b>ERRS</b>	\$1,585,000	\$1,502,000	\$ 83,000
<b>RST</b>	\$ 59,000	\$ 48,000	\$ 11,000
<b>EPA</b>	-----	-----	-----
<b>TOTAL</b>	\$1,644,000	\$1,555,000	\$ 94,000

Percent of Ceiling Utilized to Date: 95%

**Note: The above accounting of expenditure is an estimate based on figures known to the OSC at the time this report was written. Costs provided in this report are an estimate only and do not reflect a monetary figure that EPA may include in any claims for cost recovery.**

**V. DISPOSITION OF WASTES:**

Scrap metal.....recycled  
Concrete.....construction fill  
Clean wood, trees.....chipped for mulch  
Cr+3 contaminated soil ....landfilled  
As/Pb contaminated soil...stabilization/treatment/landfill  
C & D debris.....construction fill/landfill  
Chemicals.....incinerated; neutralized  
Used PPE, poly drums.....fuels blending  
Coal pile.....landfill  
Oil-contaminated soil.....TBD (probably thermal desorption)  
Friable ACM.....mixed with concrete, drummed/landfilled

**Final POLREP \_\_\_\_\_ Further POLREPS Forthcoming XXX**

C.T. MALE ASSOCIATES, P.C.

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**SEPTEMBER 3, 2002 EPA POLLUTION REPORT NO. 21 AND  
FINAL**

U. S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION REPORT

DATE: 9/3/02

SUBJECT: Independent Leather Site, Gloversville, Fulton County, NY

FROM: Paul L. Kahn *Paul L. Kahn*  
On-Scene Coordinator  
Response and Prevention Branch

B. Sprague, 2 ERRD-RPB  
J. LaPadula, 2ERRD-NYRB  
J. Regna, 2ORC-NYCSFB  
R. Byrnes, 2OIG  
C. Kelley, 2RST  
Chf. M. Shafer, GFD  
T. Rivero, 2OPM/GCMB  
S. Fitz-James, Hdqts.5202G

J. Higgins, 2ERRD-RPB  
P. Carr 2CD-POB  
R. Cahill, 2CD-PAT  
J. Daloia, 2RPB-ER  
M. McClean, NYSDEC R-5  
~~REDACTED~~  
R Manna, 2OPM/FMB

**POLREP No.:** Twenty one (21) and FINAL

**I. BACKGROUND:**

SITE NO:	QW
Delivery Order No:	040
Response Authority:	CERCLA
NPL Status:	Non-NPL
Action Memo Approval Date:	5/16/01
Start Date:	4/5/01
Mobilization Date :	4/6/01
Demobilization Date:	4/10/01
Remobilization Date:	5/13/02
Completion Date:	8/30/02

**II. SITE INFORMATION:**

**A. Incident Category:** CERCLA time-critical removal action

**1. Site Description**

The Site was a defunct leather tannery, consisting of two processing buildings and various out-buildings, located in a mixed residential/commercial area.

It was abandoned in 1994 with hundreds of drums of chemicals, including corrosives, metallic pigments, resins, acids, lab chemicals, water-reactive solids, chromium solutions, and biowaste consisting of animal hair, skin fleshings, and small body parts.

The main building was in poor physical condition; the roof had collapsed in four places. Portions of first floor fell into the basement, floors were sagging in many places, and wooden load-bearing columns in the basement were deflected and split.

## **2. Description of Threat**

Primary threat was from fire and contact with chemicals/biological waste.

## **III. RESPONSE INFORMATION:**

### **A. Current Situation**

Removal action completed on 8/30/02. All crew, equipment and trailers demobilized; electrical power has been disconnected. The property has been returned to the control and jurisdiction of the City of Gloversville.

### **B. Actions Taken**

ERRS crew completed repairs to sections of walls of Cayadutta Creek where it flows through the Site, and two abutments for the small wooden bridge that spanned the Creek.

ERRS completed contouring and seeding property for erosion control.

Results of analysis of the soil and water removed from under the partial UST discovered on the east side of the Site showed no contamination above background levels; soil was backfilled onto the Site. The water exhibited no contamination, and approx. 60 gals. was discharged to the sanitary sewer.

ERRS boarded up all ground floor windows in the remaining tannery building, locked entry doors with chains and padlocks, and erected chain link gates across each end of the wooden bridge to prevent access by the general public.

Director of DPW did Site walk-thru, and was given three sets of keys to all padlocks.

**C. Key Issues**

N/A

**D. Next Steps**

N/A

**IV. COST INFORMATION**

The following table presents information on estimated costs for the removal action:

	<u>Ceiling</u>	<u>Costs to Date</u>	<u>Remaining Project Funds</u>
ERRS	\$1,585,000	\$1,532,000	\$ 53,000
RST	\$ 59,000	\$ 48,000	\$ 11,000
EPA	-----	-----	-----
TOTAL	\$1,644,000	\$1,580,000	\$ 64,000

Percent of Ceiling Utilized to Date: 97%

**Note: The above accounting of expenditure is an estimate based on figures known to the OSC at the time this report was written. Costs provided in this report are an estimate only and do not reflect a monetary figure that EPA may include in any claims for cost recovery.**

**V. DISPOSITION OF WASTES:**

Scrap metal.....recycled  
Concrete..... construction fill  
Clean wood, trees..... chipped for mulch  
Cr+3 contaminated soil .....landfilled  
As/Pb contaminated soil.....stabilization/treatment/landfill  
C & D debris.....construction fill/landfill  
Chemicals.....incinerated; neutralized  
Used PPE, poly drums.....fuels blending  
Coal pile.....landfill  
Friable ACM.....mixed with concrete, drummed/landfilled

**Final POLREP XXX      Further POLREPS Forthcoming \_\_\_\_\_**

C.T. MALE ASSOCIATES, P.C.

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**AUGUST 1, 2002 EARTH TECH MEMO**



## Memo

To: Paul Kahn, OSC, EPA Region II

CC: Site File, Jeffery Marx, C. T. Male Associates

From: Carl Duffey – RM, Earth Tech, Inc. *CWD*

Date: August 1, 2002

Re: Independent Leather Site, Excavated Arsenic area MW-11

Earth Tech completed backfill of this area on July 26, 2002. The measurements for this excavation was approx 22 ft by 22 ft by 4 ft deep with monitoring well MW-11 as the center point. Earth Tech will T & D two (02) 20 - yd rollofs of soil excavated from this area.