

United States Environmental Protection Agency
Region II
POLLUTION REPORT

Date: Monday, October 8, 2007

From: Jack D. Harmon

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

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

POLREP No.:	9	Site #:	YH
Reporting Period:	8/07/2007 thru 10/05/2007	D.O. #:	EP-W-04-054-044
Start Date:	1/10/2007	Response Authority:	CERCLA
Mob Date:		Response Type:	Time-Critical
Demob Date:		NPL Status:	Non NPL
Completion Date:		Incident Category:	Removal Action
CERCLIS ID #:	NYN000205908	Contract #	EP-W-06-072
RCRIS ID #:			

Site Description

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

buildings are estimated at 367,000 ft².

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

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

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

Current Activities

Site security was in place during all non-working hours this period and no incidents were reported. One hallway where mold is multiplying was secured and entry prohibited. Two areas, in Building #5, that have been damaged by water leaking from the roof continue to be off-limits.

During the week of August 6, 2007, the ERRS contractor removed 840 feet of chemical piping, 350 feet of cable/wires, and ceiling tiles were removed from Room 120 in Building 1. Air monitoring, in the vicinity a sodium bisulfate tank area, indicated elevated readings for sulfur dioxide and the levels for PPE were

upgraded to “level B”. Hydrochloric acid lines were drained in Building 1 (Room 121) and the ERRS contractor began dismantling the process lines. The RST contractor collected 13 waste water samples and three sludge samples from sumps throughout the facility and shipped the samples for laboratory (Chem-Tech) analyses.

During the week of August 13, 2007, approximately 2,750 gallons of sodium bisulfate was shipped for disposal at a Clean Harbors’ facility in Bristol, CT. The ERRS contractor, along with a Clean Harbors’ crew, dismantled parts of a hydrochloric acid tank, hydrochloric acid piping, and portions of the sodium bisulfate tank in Building 1.

During the week of August 20, 2007, the ERRS contractor and Clean Harbors personnel, completed dismantling the hydrochloric acid tank in Building 1. RST contractor personnel collected 47 solid waste samples, 32 concrete samples, twelve wipe samples, four dust samples and one water sample for RCRA metals analysis; those samples were then shipped to their respective CLP laboratories.

During the week of August 27, 2007, the U.S. Coast Guard, Atlantic Strike Team (“AST”), mobilized two members and began work on-Ssite. AST will be responsible for monitoring work zone compliance with the Site-specific health and safety plan (“HASP”). AST will also be responsible for monitoring air quality within the work zone(s). The RST contractor conducted hazcat analyses on seven multi-media samples. RST personnel and the AST also conducted air monitoring in work zones with Multi Rae and ITX Multi Gas meters.

During the week of September 3, 2007, ERRS personnel continued to dismantle ferric chloride tanks and clean debris and residue from adjacent areas. These materials were placed into roll-off or 55 gallon drums pending treatment and/or disposal. RST and the AST continued to conduct air monitoring work zone areas and based upon the sources of poor air quality being removed, personal levels of protection were downgraded to “level C”. Also during the week, the Industrial Development Agency and a local newspaper were on-Site to meet with the OSC to discuss the current progress as well as future plans of the removal action.

During the week of September 10, 2007, ERRS personnel continued their efforts in dismantling the ferric chloride and sodium bisulfate tanks in Building 1. The AST finalized the HASP and was signed by all on-Site personnel. The RST contractor and the AST continued to conduct regular air monitoring in and around the work zones. During the week, a total of 25,300 gallons of waste water was discharged to the Cortland POTW from one of the on-site clarifiers.

During the week of September 17, 2007, the ERRS contractor completed demolishing the containment walls surrounding the sodium bisulfate and ferric chloride tanks and after removing overhead chemical piping, began decontaminating Room 1-122. A decontamination/CRZ area was established within a detached garage adjacent to Building 1. A total of 65,100 gallons of waste water was transferred to the Cortland POTW.

During the week of September 24, 2007, the ERRS contractor completed decontaminating Room 1-122 and initiated dismantling of the ferric chloride and sodium hydroxide tanks in Building 1. The AST continued air monitoring in and around the work zones. 3,100 gallons of sodium hydroxide was shipped for off-Site treatment. For the week, a total of 29,600 gallons of waste water was transferred to the Cortland POTW.

During the week of October 1, 2007, the ERRS contractor concentrated their efforts on accessing and removing contents from three bulk storage tanks, two containing sodium hydroxide and one containing ferric chloride. A vacuum truck with vacuum boxes is being used to remove the solids. On Monday, 1,500 gallons of sodium hydroxide was shipped off-site for treatment. An additional 38,000 gallons were discharged to the POTW, bringing the total to date to 298,000 gallons. The AST continues to monitor work zone safety and provide air monitoring.

On September 27, 2007, an Action Memorandum requesting a change in the scope of response, ceiling increase and \$2 million and 12-month exemptions was approved. An additional \$2,409,000 was committed which brings the total for the ERRS contractor to \$3,300,000.

Planned Removal Actions

The winter of 2006-2007 was the first winter season without maintenance oversight and as a result, building conditions have deteriorated due to extensive roof leaks, burst water and chemical feed pipes and significant mold growth. Leaking acid feed pipes will only accelerate the deterioration process. These worsening conditions significantly change the level of clean-up EPA must complete. In addition, the

information offered by a former maintenance person at the facility proved inaccurate; that resulted in far more contamination remaining in the process piping than originally thought.

Next Steps

EPA will continue Site security during all non-working hours. ERRS will pursue disposal and recycling options for the waste material remaining on-Site. The AST will continue to provide air monitoring and oversight of work zone health and safety and compliance to the HASP. The RST contractor will continue to perform general oversight of field activities, assist the AST in air monitoring, provide written and photo-documentation of field activities, maintain the OSC website, and prepare periodic pollution reports.

Since the action memorandum has been approved, field activities will currently be increased to address the extensive contamination within the buildings' interior.

Key Issues

Since the condition of the buildings has worsened, EPA will increase its scope of work to include removal and disposal of process piping, cleaning and dismantling of tanks, decontamination of building interiors, salvaging equipment, scrapping of metal components and, may include demolition of some buildings.

Disposition of Wastes

Waste Stream	Quantity	Manifest #	Disposal Facility
Waste water	166,500 gals	n/a	Cortland POTW
Sodium Bisulfate	2,750 gals	BOL #81935	Clean Harbors of CT Inc. 51 Broderick Road Bristol, CT 06010
Waste Sodium Hydroxide	4,600 gals	000987968 FLE & 000685937 FLE	Clean Harbors of CT Inc. 51 Broderick Road Bristol, CT 06010

www.epaossc.org/BuckbeeMears