United States Environmental Protection Agency
Region II
POLLUTION REPORT

Date: Monday, November 5, 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.:	10	**Site #:**	YH
Reporting Period:	10/06/07 to 11/04/07	**D.O. #:**	EP-W-04-054-044
Start Date:	1/10/2007	**Response Authority:**	CERCLA
Mob Date:		**Response Type:**	Time-Critical
Demob Date:		**NPL Status:**	Non NPL
Completion Date:		**Incident Category:**	Removal Action
CERCLIS ID #:	NYN000205908	**Contract #**	EP-W-06-072
RCRIS ID #:			

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

buildings are estimated at 367,000 ft2.

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

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

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

Current Activities
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 October 8, 2007, the ERRS contractor concentrated their efforts on accessing and removing contents from two more bulk storage tanks, containing sodium hydroxide and ferric chloride. A vacuum truck with vacuum boxes is being used to remove the solids. In addition, two of the three

clarifiers in the waste water treatment were cleaned-out. An additional 19,800 gallons were discharged to the POTW, bringing the total to 306,800 gallons.

Representatives from both the NYSDOH and Cortland County HD were on site for a site tour and to discuss the status of the removal action. A Public Information Officer from the USCG was on site for the purpose of developing a story for their monthly Coast Guard magazine.

During the week of October 15, 2007, the ERRS contractor continued their efforts on accessing and removing contents the two bulk storage tanks, containing sodium hydroxide and ferric chloride. A vacuum truck with vacuum boxes is being used to remove the solids. The last of three clarifiers in the waste water treatment was cleaned-out. On Wednesday, 3,025 gallons of nitric acid was vacuumed and shipped for off-site treatment/disposal. On Friday, October 19, 2007, Mike Basile from EPA's Buffalo Public Information Office, was on-site for a brief tour of the buildings and to deliver a fact sheet to residents in the surrounding neighborhood.

During the week of October 22, 2007, the ERRS contractor completed the removal of compacted solids remaining in a sodium hydroxide and a ferric chloride tank. The tanks are in the process of being dismantled. On Wednesday, the last remaining 1,774 gallons of nitric acid was vacuumed-out and shipped for off-site treatment/disposal. Over the weekend, ferric chloride contained inside a vacuum box ate through a weld and leaked approximately 200 gallons onto the ground. The ERRS crew applied sodium bicarbonate to neutralize the acid. The impacted soil was excavated and placed into a roll-off box.

During the week of October 29, 2007, the ERRS contractor moved their tank cleaning/dismantling operation from building #1 to building #5. Four chemical bulk storage tanks, three containing sodium hydroxide and one containing ferric chloride have minimal residual materials that require removal. Concurrently, the ERRS contractor along with Clean Harbors recovered approximately 2,500 gallons from purging/vacuuming ferric chloride piping in building #1. One roll-off box of waste sodium hydroxide was shipped off-site.

The AST continues to monitor work zone safety and provide air monitoring. The RST contractor continues to provide oversight and administrative support.

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.

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 Nitric Acid	4,799 gallons	002058355/002058059	Reserve Environmental 4633 Middle Road Ashtabula, OH 44004
Waste Ferric Chloride	1,475 gallons	001573356	EQ Detroit, Inc. 1923 Frederick St. Detroit, MI 48211
Waste Sodium Hydroxide	17 tons	001104937	Clean Harbors of Ct.

			51 Broderick Rd Bristol, CT 06010

www.epaosc.org/BuckbeeMears