

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

Date: Monday, January 28, 2008

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.:	12	Site #:	YH
Reporting Period:		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 December 10, 2007, WRS personnel continued purging and cutting chemical process piping. Residual materials contained inside the piping is being placed into drums. 10,055 feet of ferric chloride, nitric and hydrochloric acid process lines were addressed. Twelve roll-offs, 320 cubic yards of

C & D debris and ferric chloride solids were shipped off-site for disposal.

During the week of December 17, 2007, WRS personnel continued purging and cutting chemical process piping. Residual materials contained inside the piping is being placed into drums. 3,802 feet of ferric chloride, nitric and hydrochloric acid process lines were addressed, bringing the total to date to 21,967 feet. Three roll-offs, 85 cubic yards of C & D debris and ferric chloride solids were shipped off-site for disposal. Temporary electric service was installed to the decon area which terminated the need for the generator.

Operations resumed on Monday, January 7th after the observance of the Christmas and New Years Holidays. WRS personnel resumed operations on purging and cutting chemical process piping. 1,470 gallons of ferric chloride and hydrochloric acid were recovered. 8,560 feet of ferric chloride and hydrochloric acid process lines were addressed, bringing the total to date to 30,527 feet. One 20 CY roll-off of C&D debris was shipped off-site.

During the week of January 14, 2008, WRS personnel continued operations on purging and cutting chemical process piping. 3,175 gallons of ferric chloride and caustic liquids were recovered. 8,000 feet of ferric chloride, hydrochloric acid, and other caustic process lines were addressed, bringing the total to date to 38,527 feet. Two 25 CY roll-off of C&D debris was shipped off-site.

During the week of January 21, 2008, WRS personnel continued operations during the reporting period by purging and cutting chemical process piping. During the reporting period, 6,855 feet of various chemical feed lines were addressed, bringing the total to date to 45,382 feet. One 20 CY roll-off of C&D debris 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
Non-hazardous C&D	330 CY	various	Waste Management - High Acres Landfill
Non-hazardous debris (ferric chloride)	210 CY	various	Seneca Meadows Landfill