

TSCA Section 6(a) PCB Inspection

Custom Leather Services, Inc.  
1027 North American Street  
Philadelphia, PA 19123

Date of Inspection: September 7, 1989

EPA Representative:

Charles Hufnagel  
Environmental Engineer

Facility Representative:  
(Not in Attendance)

Charles Eisenfelder  
Plant Operations

City of Philadelphia Representatives:  
(Dept. of Licenses and Inspections)

Tom Patterson  
Fire Inspector

Bill Wolstenholme  
Fire Inspector

Realtor Representative:

Jay Goldenberg  
Corporate Real Estate  
Services

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### Background

The purpose of this inspection was to document and verify the compliance status of the Custom Leather Services, Inc., (Philadelphia, PA) site with federal TSCA regulations concerning the handling, storage and disposal of PCBs and PCB items (PCB Rule 40 CFR Part 761). This facility was added by EPA Region III to the FY 1989 Administrative Inspection Scheme as a referral by Superfund which had performed an emergency removal at the site in 1987.

### Opening Conference

On September 7, 1989 at about 1315, the EPA representative met with Messrs Tom Patterson and Bill Wolstenholme, City Fire Inspectors and Mr. Jay Goldenberg, Realtor, at the subject site. The EPA representative presented his credentials to them. Custom Leather Services had no representative(s) in attendance.

Region III had previously sent the Custom Leather Services representative, Mr. Charles Eisenfelder a certified letter (5/9/89) which included and explained the TSCA Notice of Inspection and TSCA Inspection Confidentiality forms. On September 1, 1989, the EPA representative contacted Mr. Eisenfelder by telephone to notify him of the date and time of the subject inspection. Mr. Eisenfelder indicated that neither he nor any other representative would be present for the subject inspection. He acknowledged receiving the TSCA forms and indicated he would return them to Region III. At the time of this report, the forms had not yet been returned.

### Facility Description

Custom Leather Services (CLS) had been a leather tanning operation prior to it's shutdown in 1986. The facility site

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consists of a building which essentially occupies an entire block. CLS had purchased the facility from Trans-Continental Leather, Inc. in 1981. At the time of the subject inspection, the facility had no electricity. Corporate Real Estate Services is handling the CLS property sale and had access to the building at the time of the subject inspection.

#### Physical Inspection

Corporate Real Estate Services' representative Mr. Goldenberg had access to the building and initially led the EPA and City inspectors to an electrical room located on the first floor. Mr. Goldenberg indicated that he was not aware of any other electrical equipment in the building.

The electrical room included six oil-filled transformers and 10 large capacitors. The 6 transformers were mounted in three sets of 2 transformers each. Some of these transformers had been tampered with, possibly for salvaging internal parts.

The first set of transformers noted were located along the north wall of the room. The nameplate data for each read: Pittsburgh Transformer, 55 gal. oil (SNs 1202565, 1202566). One of the transformer's (SN1202565) top had been removed and had been essentially drained of oil. Two drain valves had been removed and oil was noted to be slowly dripping from the transformer. The other transformer appeared to be intact; no leaks were noted. A sample (CLS-1) of the oil from the leaking transformer was collected. CRL detected no PCBs in this analysis.

The second set of transformers noted were located along the east wall of the room. The nameplate data for each read: GE, 32

gal. 10c oil (SNs 5426725, 5426726). The lids had been removed from both transformers and both transformers had essentially been drained of oil. Since the transformers had apparently been drained onto the floor, an oil sample (CLS-2) was collected from puddled oil on the floor between the 2 transformers. CRL detected 2330 mg/kg PCB (Aroclor 1260) in this analysis.

The third set of transformers noted were located along the south wall of the room. The nameplate data for each read: Marcus Askarel Transformer, 120 gal. M-2 oil, 1800 lbs. (SNs could not be read). One transformer top had been removed and the transformer had essentially been drained of oil. An open drain valve was noted to be slowly dripping oil onto the floor. The other transformer appeared to be intact; no leaks were noted. An oil sample (CLS-3) was collected at the drain valve and from an oil puddle on the floor under the drain valve. CRL detected 38,392 mg/kg PCB (Aroclor 1260) in this analysis. Also, an oily solids sample (CLS-4) was collected from the floor in front of the other transformer. This material, which appeared to have the consistency of soil, may have been some type of absorbent. CRL detected 15,646,657 ug/kg (Aroclor 1260) PCB in this analysis.

The 10 large capacitors were located in two banks of 5 capacitors each. One bank was located just off the floor along the east wall. It consisted of 5 PCB capacitors: 2-Sprague Power Factor Converter Capacitors, .6 gal. Chlorinol each and 3-Westinghouse 15KVA, 460 V, 1.7 gal. Inerteen Capacitors. The other bank was located on a rack along the west wall. Although their nameplates could not be read in detail, they could be identified

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as Westinghouse and appeared to be the same as the Westinghouse Inerteen Capacitors, previously noted. One of these capacitors was found to have leaked. Although it did not appear to be leaking at this time, its front face was covered with oil which also had dripped below onto an electric meter and the floor.

The electrical room floor was essentially covered with oil and oil soaked debris (trash, wood, dirt, etc.) There was no apparent leakage noted outside the room although with the debris covered floor it could not be determined if there were floor drains or other possible floor openings. Otherwise, the room consisted of four brick walls, a curbed (about 1') entrance and a concrete floor.

There were no PCB M<sub>1</sub> labels noted at the room's entrance or on any of the above noted electrical equipment.

Mr. Patterson pointed out the basement access which was noted during a joint Region III/City visit to the facility in March 1989. As was noted then, the basement contained water at this time, also. The EPA representative toured the basement and found the depth of water to vary from about 1/2' to about 2' above the floor. No electrical equipment was noted here. A water sample (CLS-5) was collected in the basement. CRL detected no PCBs in this analysis.

The EPA representative also took a general tour of the facility with Mr. Goldenberg. Although the facility contained various equipment and machinery, no other electrical equipment was noted. Two hydraulic presses (Wilburn SP126, SP49) were noted on the 2nd floor. A bucket of hydraulic oil at this location was sampled (CLS-6) at this time. CRL detected no PCBs in this sample.

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Photographs of the transformers and capacitors and the CRL  
sample analyses are included with this report.

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### Summary of Findings

Custom Leather Services, Inc., a leather tanning facility, has been out of operation since 1986. The site is essentially a building which covers about 1 block.

The building contained an electrical room which included 6 oil-filled transformers, 2 of which were PCB as identified by their nameplates (Marcus Askarel Transformers). The debris covered floor was saturated with oil as 4 of the transformers, including one of the identified PCB transformers, had been drained. An oil sample collected from the floor near a set of 2 drained mineral oil transformers (GE transformers) indicated a PCB concentration of 2330 mg/kg. However, due to the possible cross-contamination from the drained PCB transformer's Askarel on the floor nearby, the PCB status of either mineral oil transformer cannot be determined with any certainty. A sample of oil that had leaked onto the floor from the drained PCB transformer showed 38,392 mg/kg PCB. An oily solids (possibly absorbent) sample collected near the PCB transformer was found to contain 15,646,657 ug/kg PCB. An oil sample collected at the drained transformer from another set of 2 transformers (Pittsburgh Transformers) contained no PCBs.

The room also contained 10 large low voltage PCB capacitors, one of which had previously leaked.

Neither the entrance to the electrical room nor any of the PCB electrical equipment found therein was marked with a PCB M<sub>1</sub> label.

The EPA representative advised the realtor that the electrical room should be considered contaminated with PCBs and no one should enter it.

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III  
CENTRAL REGIONAL LABORATORY  
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DATE : November 29, 1989  
SUBJECT: PCB Analysis of Custom Leather Services  
TSCA, (9/14/89 - 10/10/89), 890908-18 - 23  
FROM : George E. Bagley <sup>LS</sup>  
Chemist  
TO : Daniel K. Donnelly  
Acting Chief, Laboratory Branch

The subject samples were analyzed for PCBs listed on the priority pollutants compounds list. The oil samples were weighed to the nearest 0.1 gram and made to a volume of 10 mL. The water sample (1000 mL) was extracted with methylene chloride, reduced to 3 mL with Kuderna-Danish, then hexane exchange. The soil sample was air dried in laboratory hood, weighed to the nearest 0.1 gram and extracted with hexane/acetone on Soxhlet apparatus.

Results of samples along with appropriate QC analyses are shown below.

A chronology of sample activities follows:

1. Sampling date 9/7/89
2. Extraction date 9/19/89
3. Analysis date 9/26/89

Laboratory Description:

<u>Lab No.</u>	<u>Description</u>
890908-18	Custom Leather Services, Electrical Room (1st Floor), Sta. CLS-1
-19	Custom Leather Services, Electrical Room (1st Floor), Sta. CLS-2
-20	Custom Leather Services, Electrical Room (1st Floor), Sta. CLS-3
-21	Custom Leather Services, Electrical Room (1st Floor), Sta. CLS-4
-22	Custom Leather Services, Basement, Sta. CLS-5
-23	Custom Leather Services, 2nd Floor, Sta. CLS-6

GEB:ad

cc: Jim Jerpe <sup>JK</sup>  
Peggy Zawodny, QCO

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PCB Analysis of Custom Leather Services  
TSCA, 890908-18 - 23

Results:	PCB (mg/kg) (Oil)	PCB (ug/kg) (Soil)	PCB (ug/L) (Water)
890908-18	None Detected	---	---
-19	2,330 (Aroclor 1260)	---	---
-20	38,392 (Aroclor 1260)	---	---
-21	---	15,646,657 (Aroclor 1260)	---
-22	---	---	None Detected
-23	None Detected	---	---

QC Samples:	True Value (mg/kg)	Observed Value (mg/kg)	Acceptance Interval (mg/kg)
WP-978, Conc. 2 - Aroclor 1254	2.34	3.1	MDL* - 5.37
WP-978, Conc. 2 - Aroclor 1254 (Dup)	2.34	1.73	MDL* - 5.37
Blank	None Detected	None Detected	
Surrogate, DCBP	100%	108%	40-120

\*Because the lower limit is at or near zero for these samples, it is more practical to provide the lower limit based upon the Minimum Detection Limit (MDL) for any given method and/or instrument. Therefore, the interval is not strictly the 95% confidence limit.

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## PCBS PRIORITY POLLUTANT COMPOUND QUANTITATION LIMITS

<u>Parameter</u>	<u>Cas Number</u>	<u>Oil</u> (mg/kg)	<u>Low Soil/Sediment</u> (ug/kg)	<u>Water</u> (ug/L)
PCB 1016	12674-11-2	5.0	20.0	0.5
PCB 1221	11104-28-2	5.0	20.0	0.5
PCB 1232	11141-16-5	5.0	20.0	0.5
PCB 1242	53469-21-1	5.0	20.0	0.5
PCB 1248	12672-29-6	5.0	20.0	0.5
PCB 1254	11097-69-1	10.0	40.0	1.0
PCB 1260	11096-82-5	10.0	40.0	1.0

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