RILEY LEATHER CO., INC.

LEATHER MANUFACTURERS

228 SALEM STREET
P.O. BOX 316
WOBURN, MA 01801

TEL. (617) 933-5900

Wells G&H
11.9
Riley Leather

May 25, 1988

Barbara Newman
United States Environmental Protection Agency
Region 1
J. F. Kennedy Federal Building
Boston, MA. 02203-2211

Dear Barbara:

The following is a response to your May 16, 1988 inquiry. As we discussed I have not answered question no. 4 at this time as monitoring reports are available in response to question no. 2.

Question 1. Where, during the tannery operations, is water that is extracted from the well on the Wildwood Conservation Corp. property used. Please describe the locations, what it is used for, and how it is used.

Answer: Water from the well on the Wildwood Conservation Corp. property is used in the wet end processing at the tannery. Specifically the well is the source of water for the Hide House, Tan Room, Color Room, Chrome Room and Chrome Recovery. It is the source of hot water for the Beam House and Rendering Room. It is also used to water the lawn.

The tannery uses water as the medium in which the chemical treatment of the hides and leather is accomplished. It is used for washing the hides and leather and for washing the floors. The vessels holding the water and hides or leather are of two types: wooden drums up to 10' x 10' in size which rotate to provide mechanical agitation and wooden paddle vats (similar in shape to half a drum) having a reel or paddle suspended in them to provide agitation (much as a river boat is propelled by the movement of a paddle reel).

SDMS Doc ID 546185

Barbara Newman
U.S. Environmental Protection Agency

Question 2. Submit all air monitoring reports you have of the air quality inside the facility.

Answer: We have only monitored the air in the wet processing area for the volatile organics found in the well on the Wildwood Conservation Corp. property. Air monitoring in other parts of the plant did not involve these compounds. Therefore, only the results of the air monitoring in the wet processing area is attached. The monitor used to collect the air sample for this analysis was purposely fixed to a paddle vat which received all of its water from the Wildwood well and was fixed to the paddle vat during a period of time when water was running into the paddle vat with the paddle reel running to agitate the water. We tried to maximize the exposure to get a worst case result. Since the analysis indicated a non-detectable level of the compounds of interest we performed no further tests. The attached notes on the exposure limits indicate that the detection levels of these chemicals are at least 150 times less than the allowable time weighted average exposure levels recommended by The American Conference of Governmental Industrial Hygienists.

Question 3. The flow rate and quantity of the water used at the facility. Please quantify only that water that is taken from the Aberjona River aquifer and that is exposed to the indoor environment, i.e., used for washing, not run through pipes.

Answer: As indicated in the answer to question No. 1, water is used for purposes other than washing in the making of the leather. None of the water is just "run through pipes" as for example in a cooling system. I am assuming that you're interested in the amount of water used from the well on the Wildwood Conservation Corp. property. We estimate

that our consumption varies between 250,000 and 350,000 gals/day. The flow varies throughout the day but most of the water is used between 2:00 AM and 6:00 PM.

I hope that these answers will be helpful to you.

Very truly yours,
RILEY LEATHER CO., INC.

Charles J. Sheehan

Charles J. Sheehan

From: RICHARD N. JONES
RILEY LEATHER Co., INC.
228 SALEM STREET
WOBURN, MA 01801

✓ CC: GJS

Check Monitor Enclosed:
X 3510 [ ] 3550 [ ] 3600
[ ] 3600A [ ] 3750

To: Occupational Health &
Safety Products Division/3M
230-B 3M Center
P.O. Box 33125
St. Paul, MN 55133

Test Location: Monitor placed over Paddle #22
Exposed during the wash after Lairburn drain
and during time paddle was pulled: Total 3 hrs. 15 mins.

Organic Vapor Monitor No. 3510
Analysis Service Request
(Pre-paid for 3 compounds)

Monitor Number: AD 5996	
Customer Name (Print): RICHARD N. JONES	Date: 1/16/86
Company: RILEY LEATHER Co., INC.	
Address: 228 SALEM STREET	
City · State · Zip: WOBURN, MA 01801	Telephone: 617-933-5900

Important — Please record all sampling information on outside of each exposed monitor package and return in mailer with this form.

Please circle up to three (3) compounds from the list below.

OVM Analysis Service

*Acetone
Acetonitrile
Acrylonitrile
Allyl Alcohol
Allyl Chloride
Amyl Acetate
iso - Amyl Acetate
n - Amyl Alcohol
sec - Amyl Alcohol
Benzene
Benzyl Chloride
Bromoform
*Butadiene
Butyl Acetate
iso - Butyl Acetate
sec - Butyl Acetate
tert - Butyl Acetate
Butyl Alcohol
iso - Butyl Alcohol
sec - Butyl Alcohol
tert - Butyl Alcohol
Butyl Cellosolve
p-tert-Butyl Toluene
Camphor
Carbon Tetrachloride
Cellosolve
Cellosolve Acetate
Chlorobenzene
*Chlorobromomethane
Chloroform
Cumene
Cyclohexane
Cyclohexanol
Cyclohexanone
Cyclohexene
Diacetone Alcohol
o - Dichlorobenzene
p - Dichlorobenzene
Dichloromethane (Methylene Chloride)
Diisobutyl Ketone (DIBK)
Dimethyl Formamide (DMF)
Dioxane
Enflurane (2-Chloro-1, 1,2-Trifluoroethyl Difluoromethyl Ether)
Epichlorohydrin
*Ethanol (Ethyl Alcohol)
*Ethyl Acetate
Ethyl Acrylate
*Ethyl Alcohol
Ethyl Benzene
*Ethyl Bromide
Ethylene Chlorohydrin
*Ethylene Dibromide (1,2-Dibromoethane)
*Ethylene Dichloride (1,2-Dichloroethane)
*Ethyl Ether
Furfural
Halothane (2-Bromo-2-Chloro -1, 1, 1-Trifluoroethane)
Heptane
Hexane
Isophorone
Mesityl Oxide
Mesitylene
*Methyl Acetate
Methyl Acrylate
Methyl Butyl Ketone (MBK)
Methyl Cellosolve
Methyl Cellosolve Acetate
Methyl Chloroform (1, 1, 1-Trichloroethane)
Methyl Ethyl Ketone (MEK)
Methyl Isobutyl Ketone (MIBK)
Methyl Methacrylate
Methyl Propyl Ketone
Naphthalene
n - Octane
*Pentane
Perchloroethylene (Tetrachloroethylene)
*Phenyl Ether
Propyl Acetate
*Propylene Oxide (use No. 3550 Monitor)
Isopropyl Acetate
Propyl Alcohol
Isopropyl Alcohol
Isopropyl Ether
Propylene Dichloride
Stoddard Solvent
Styrene
1, 1,2,2,-Tetrachloroethane
Tetrahydrofuran (THF)
Toluene
*1,1-Dichloroethylene
Trichloroethylene
1, 1,2-Trichloro-1, 2,2-Trifluoroethane (Freon 113)
*Vinyl Chloride
Vinyl Toluene
Xylene

*Because of their high vapor pressure (low boiling points) the starred compounds are best sampled initially at reduced sampling times. Refer to the 3500 Sampling Guide (R-35SB) for details.

Form 23118-PWO

3M "Action" 200 Paper

Analytical Services
Occupational Health and
Safety Products Division/3M
St. Paul, Minnesota 55144

3M

3M

3510 Organic Vapor Monitor

(Includes 3M analysis up to 3 compounds)

Do not open inner pouch until ready to use. See instructions for recommended exposure time.

Monitor No. AD 5996
Date Exposed 1/16/86
Employee I.D. PADDLE #22
Vapor(s) to be Analyzed: 1) METHYL CHLOROFORM
2) PERCHLOROETHYLENE
3) TRICHLOROETHYLENE
Temperature 68°F R.H. 50%
Sampled by R.N.J.

(See Instructions) 34-7014-2757-L

Made under One or More U.S. Patent Nos. 3,500,9[illegible] 924,2[illegible] 4,0[illegible],201. Additional Patents applied for.

EXPOSURE TIME 3 HRS. 15 MINS

Analytical Service
Occupational Health and Safety
Products Division/3M

552-1E 3M Center
St. Paul, Minnesota 55144
Telephone: 800/243-4630

3M

AMENDED REPORT

3M Diffusional Monitor Analysis Report

Form 23121-C-PWO

Report Number	10-020-860 1 OF 1
No. of Monitors	1
Analysis Peformed	01/23/86
Prepared By	A.L. WELLS

RILEY LEATHER CO., INC.
228 SALEM STREET
WOBURN MA 01801

ATTN: RICHARD N. JONES

User Identification	Monitor Code	Sampling Date	Sampling Time	Weight	Concentration	
		Compounds(s)		Micrograms	$\frac{mg}{m^3}$	PPM
PADDLE #22	AD-5996	01/16/86	195 MIN.			
		TRICHLOROETHYLENE		<10.000	< 1.651	< 0.308 *1
		PERCHLOROETHYLENE		<10.000	< 1.724	< 0.254 *1
		METHYL CHLOROFORM		<10.000	< 1.613	< 0.296 *1

Comments
*1 10 MICROGRAMS IS MINIMUM DETECTABLE LIMIT

ACGIH Threshold Limit Values
(for 1987-88)

	TLVA	STEL
Trichloroethylene	50 ppm	200 ppm
Perchloroethylene	50 "	200 "
Methyl Chloroform (1-1-1 Trichloroethane)	350 "	450 "

TLVA = Time Weighted Average
STEL = Short Term Exposure Limit