

US EPA ARCHIVE DOCUMENT

**RILEY LEATHER CO., INC.**  
**LEATHER MANUFACTURERS**

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

Wells 674  
TEL. (617) 933-5900

May 25, 1988

11.9  
Riley Leather

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).

May 25, 1988

Page 2

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

May 25, 1988

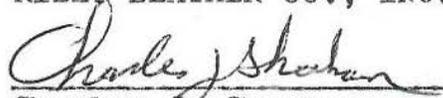
Page 3

Barbara Newman  
U.S. Environmental Protection Agency

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

FROM: RICHARD N. JONES

✓ CC: CJS

RILEY LEATHER CO., INC.

228 SALEM STREET

WOBURN, MA 01801

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 hairburn 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) <b>RICHARD N. JONES</b>	Date <b>1/16/86</b>
Company <b>RILEY LEATHER CO., INC.</b>	
Address <b>228 SALEM STREET</b>	
City-State-Zip <b>WOBURN, MA 01801</b>	Telephone <b>617-933-5900</b>

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

\* 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-35SR) for details.

Form 23118-PWO

3M "Action" 200 Paper

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



# 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

EXPOSURE TIME 3 HRS. 15 MINS

Made in the U.S.A. or More U.S.A. Additional Patents applied for.

Analytical Service  
Occupational Health and Safety  
Products Division/3M

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



AMENDED REPORT

**3M Diffusional Monitor  
Analysis Report**

Form 23121-C-PWO

Report Number	10-020-860 1 OF 1
No. of Monitors	1
Analysis Performed	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)

---

	<u>TWA</u>	<u>STEL</u>
Trichloroethylene	50 ppm	200 ppm
Perchloroethylene	50 "	200 "
Methyl Chloroform (1-1-1 Trichloroethane)	350 "	450 "

TWA = Time Weighted Average

STEL = Short Term Exposure Limit