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DOCUMENTS CONCERNING JOHN J. RILEY LEATHER COMPANY

METROPOLITAN DISTRICT COMMISSION

INDEX

- TAB 1            Summary - May 18, 1973 thru December 2, 1981
- TAB 2            Correspondence Regarding Process Wastewater  
Discharges  
December 9, 1980
- TAB 3            Industrial Investigation Report  
October 11, 1978



JOHN J. RILEY COMPANY - WOBURN - SUMMARY

- 5/18/73 Original permit application.
- 10/11/78 Inspection C. Lombardi, R. Dunn
- 11/10/78 Permit application
- 12/19/78 Letter to Mr. Riley requesting analysis: pH, heavy metal concentrations, grease/oil, data to be submitted by 2/2/79
- 12/22/78 Extension request from Mr. Riley until 4/2/79
- 1/2/79 Extension granted.
- 4/13/79 Letter from Burton Segall, Burton Segall Environmental Engineering samples being taken for COD, sulfides, TKN, total and soluble chromium, pH, alkalinity, and flow.
- 5/25/79 Report from engineering firm on COD, BOD, pH, grease, T.S., T.S.S., sulfides chromium, Pb, Cd - hourly composite samples for average working days of April 20,22,24,25, May 2
- 8/23/79 Permit Application
- 11/12/80 Inspection J. Vetere, R. Kubit
- 11/17/80 Request for inspection summary from Mr. Riley
- 11/26/80 Letter to Lori Fucarile of Ecology and Environment, Inc. forwarding analytical data for wastewater effluent and permit application to assist her in research of company.
- 12/4/80 Letter of thank you.
- 12/9/80 Division requiring (as a result of 11/12/80 inspection)  
-uncontaminated cooling A<sup>2</sup>O be eliminated from sanitary sewer  
-analysis of pH, COD, BOD, oil/grease, TDS, TSS, TSeS sulphates, chlorides, chromium (total and hexavalent), lead, Cd.
- 12/26/80 Memorandum - meeting to clarify what is required by MDC on cooling H<sup>2</sup>O and limits on Gr, Pb, oil, grease.
- 1/21/81 Letter restating conclusions of meeting requested analysis by 1/31/81 cooling H<sup>2</sup>O eliminated from sanitary sewer.
- 5/18/81 Analysis submitted
- 6/18/81 Sampling by L. O'Shea
- 9/2/81 Telephone call concerning permit attachment C (Cr+6) should be (Cr+3) should really be (Cr total) request for 12/16/80 memo

JOHN J. RILEY COMPANY - WOBURN - SUMMARY

- 9/3/81 Request for DEQE limits for discharge to a stream.
- 9/3/81 Request for 12/16/80 memo, still disagrees with permit conditions.
- 9/4/81 Permit
- 9/11/81 Telephone call to ask who at Beatrice Foods, of which the company is a subsidiary, would the MDC discuss waste problems with. Mr. Riley 's memo will not be sent.
- 10/30/81 Revision of Attachment C to User Permit.
- 12/23/81 Revision alters expiration date to 10/29/83.
- 12/2/81 Letter from Mr. Riley once again requesting specific limitations for pollutants, as of 4/81 no contaminated cooling H<sub>2</sub>O has entered the sanitary sewer.





# *The Commonwealth of Massachusetts*

## *Metropolitan District Commission*

*20 Somerset Street, Boston 02108*

SEWERAGE DIVISION

December 9, 1980

JOHN J. RILEY COMPANY  
228 Salem Street  
Woburn, MA 01801

ATTENTION: John J. Riley, Jr.

Dear Mr. Riley:

SUBJECT: Process Wastewater Discharges

As a result of the inspection of your facility by J. Vetere and R. Kubit of this office, it was revealed that John J. Riley Company was purchased by Beatrice Foods Company of Chicago, IL. It was also learned that despite the change in ownership operations at this location have remained the same.

On May 25, 1979 an analysis of this company's process waste was submitted to this office. The analysis of this waste indicated concentrations of chromium (Cr), lead (Pb), and oil and grease which are considered excessive to discharge to the sanitary sewer system. These above mentioned concentrations are in direct violation of Article III, Sections 2f and 2h of the Metropolitan District Commission's Rules and Regulations. (See enclosed copy) In addition, the pH of the process waste was at times outside the 5.5 to 9.5 pH units range required by the Metropolitan District Commission's Rules and Regulations.

The Division is requiring at this time that:

1. All uncontaminated cooling water be immediately eliminated from entering the sanitary sewer system and an alternate method of disposal be implemented.
2. Your company contact an approved testing laboratory to conduct an analysis program on samples collected while all processes are in full operation. The analysis should include flow measurements, pH readings, chemical oxygen demand (COD), biochemical oxygen demand (BOD<sub>5</sub>), grease, oil, total dissolved solids, total suspended solids, total settleable solids, sulphates, chlorides, chromium, both total and hexavalent, lead and cadmium. These analyses should be performed on samples of process wastewater only, excluding dilution by any other wastewater (e.g.; domestic and/or uncontaminated cooling water). This data should be submitted to this office prior to January 12, 1981.

December 9, 1980

As per your request, a summary of the November 12, 1980 inspection of your facility is enclosed.

The Division of Water Pollution Control has a list of concentration limits for certain pollutants which this office uses as a guideline, for a general indication as to Metropolitan District Commission limitations. (See Metropolitan District Commission Rules and Regulations, Article III, Section 2h). However, this office may be more stringent on certain concentrations. The Division of Water Pollution Control can be contacted at 110 Tremont Street, Boston, MA to discuss their "Concentration Limits For Certain Pollutants January 1980".

Notification as to your intended action is anticipated prior to December 31, 1980.

If this office can be of any further assistance, please do not hesitate to contact Steven J. Kruger at 727-5260.

Very truly yours,



WAYNE T. GRANDIN

Associate Sanitary Engineer

*JPV*  
JPV/kw

Enclosures

## SUMMARY

The John J. Riley Company is a full scale tannery with the final product being the tanned hide and not the leather product.

The following operations produce liquid industrial waste:

- 1) dehairing, 2) fleshing, 3) bating, 4) pickling, 5) tanning
- 6) coloring, and 7) fat liquoring.

All liquid wastes generated are discharged to a sedimentation tank (38,000 gallons) via floor drains, except for the fleshing waste which flows to a holding tank where the fatty substances and flesh are skimmed off then sold, the tank return is discharged to the sedimentation tank.

Mr. John J. Riley, Jr. knows that some of the wastewater parameters are in excess of the Metropolitan District Commission Rules and Regulations. He wanted to know the exact limits so that Beatrice Foods could get underway to start a pretreatment system which would create an acceptable discharge.

Points of interest:

1. Sanitary and process wastes are not segregated.
2. At the time of inspection, the racks before the sedimentation tank were not cleaned.
3. In the sedimentation tank, solids were seen floating directly to the sanitary sewer. Scum removal is not practiced.
4. The sludge generated is disposed of on the company's property.
5. One water cooled air compressor was present. A once through type. The cooling water discharges to either the sanitary or the storm sewers. (The City Engineer of Woburn had no records on the connection but assumed it discharges to the storm sewer). Amount of cooling water was visually estimated at approximately 720 gpd.
6. Three paint booths with water curtains also discharge to the sedimentation tank.

JPV/kw



METROPOLITAN DISTRICT COMMISSION  
INDUSTRIAL INVESTIGATION REPORT

Investigation Date 10/14/77

Municipality WOBURN  
Zip Code 01801

Investigators:  
MDC C. W. HARRIS  
B&V R. J. PINE

Industry Name: JOHN BILEY Co

Billing Address: 210 SALEM ST

Address: 210 SALEM ST  
WOBURN CITY

WOBURN CITY

Muni. Customer Acct. NO.: \_\_\_\_\_

Contact: JOHN BILEY

Weekly Hrs. of Operation: 40-50

Title: OWNER

No. of Employees: 125 people

Telephone: \_\_\_\_\_ Ext. \_\_\_\_\_

Service Utility: \_\_\_\_\_ ICR Code: \_\_\_\_\_

SIC NO: P 3 1 1 1

Raw Materials: COGNAC

Products: LEATHER

Industrial Category: MANUFACTURER

Pretreatment Present: SEDIMENTATION

Water Source: MDC \_\_\_\_\_ Surface \_\_\_\_\_ Wells  Other  CITY WELLS

(Check all that apply)  
Left: Permit application  Rules & Regulations  Scavenger List

Comments: Definite violations exist here. Analytic data should be requested with special attention to

- 1) PH
- 2) Chrome
- 3) Solids
- 4) oil + grease

Samples could be take from the sedimentation tank, even though some domestic waste enters here.

METROPOLITAN DISTRICT COMMISSION  
INDUSTRIAL INVESTIGATION REPORT

Page 2 of 8

Investigators:

Investigation Date: 10/11/73

Municipality: WABERON

MDC: Bill BOMBARDI

Zip Code: 51781

B&V: 51781

Industry Name: Town Riley Co

The Town Riley company is a full scale tannery with the final product being the tanned hide and not the leather product. Because the tanning operation involves many different procedures I will discuss each procedure separately.

The Riley Co receives the hides with all the hair still on them. The first process they perform is called:

Dehairing = In the dehairing process the hides are placed in large paddling vats along with water, calcium hydroxide, and sodium sulfide. After the hides have all been dehaired they are removed from the vats and flaked and stamped. (\* Let me note ~~that~~ that Mr. Riley was not present @ this time but 3 of his assistants were. Ed. Folley, Charles Shea, and Ed Kane, Ed Kane did all the talking throughout the tour.) All resulting waste from

METROPOLITAN DISTRICT COMMISSION  
INDUSTRIAL INVESTIGATION REPORT

Page 3 of 8

Investigators:

Investigation Date: 10/11/78

Municipality: Woburn

MDC: CW LOMBARDI

Zip Code: 01891

B&V: BT DUNDY VA

Industry Name: JOHN RILEY CO

The deboning operation is discharged via  
pneumatics to their sedimentation tanks and  
then out to the sewer. This waste is discharged  
every 4 days and falls in the 11-13 pH range.  
There are many of these paddling units throughout  
the company and deboning operations could  
overlap which would result in discharging  
this waste @ less than 4 day intervals. This  
situation was not discussed but the possibility  
of such an occurrence definitely exists.

After the deboning and coloring for easy  
handling the hides are then sent to the fleshing  
process.

Fleshing - The hides are allowed to <sup>drain</sup> after the  
deboning and are then placed in a roller type  
machine where excess flesh and fatty sub-  
stances are removed. This waste is rendered for  
by products. Any liquid waste remaining from  
deboning or wash down is discharged via floor

METROPOLITAN DISTRICT COMMISSION  
INDUSTRIAL INVESTIGATION REPORT

Page 4 of 8

Investigators:

Investigation Date: 10/11/78

Municipality: WABURN

MDC: CU Lombardi

Zip Code: 01801

B&V: B J D'Amico JR

Industry Name: John Riley Co

to their sedimentation and then set to the  
mills.

From the previous procedure the papers are  
now ready to be tanned. The actual tanning  
process involves 3 steps: Bating, Pickling,  
Tanning.

1) Bating - The object of this process  
is to remove all impurities and conditions  
which will remain on the paper after  
the paper is placed in the mill. The same  
type of impurities are removed with the addition of  
water and other impurities such as ammonia  
chloride. The addition of these chemicals also  
adjust the acid alkaline condition to the proper  
point for reclaiming the water. The bating is  
enzyme based and those found in the digestive  
systems of animals. The bating operation is  
designed to remove various and fragments  
which may be present. All waste from  
the process is recycled.

METROPOLITAN DISTRICT COMMISSION  
INDUSTRIAL INVESTIGATION REPORT

Page 5 of 8

Investigators:

Investigation Date: 10/11/78 Municipality: WABURN  
Zip Code: 01801

MDC: CW LOMBARDI  
B&V: R J DUNN JR

Industry Name: Riley Co

The operation is discharging via flood drains →  
to sedimentation tanks → river.

From bating the hides go to "Pickling"  
"Pickling" → The object of the pickling operation  
is to transfer some of the fat into an acid emulsion  
mixture. The same tanks drums used for bating  
are used. The extra hides are placed in  
these drums with sulfuric acid water and  
common salt. The waste from here is dis-  
charged via flood drains → sedimentation tanks  
→ river.

From "Pickling" the next step is Tanning  
Tanning → The object of the tanning is to convert  
the skin into a stable non-perishable  
material. The hides are placed in similar  
tanks with water and chromium sulfate and  
are mixed from 4-6 hours. All waste is discharging  
via flood drains → sedimentation tanks → river

11/1/78 CWL

METROPOLITAN DISTRICT COMMISSION  
INDUSTRIAL INVESTIGATION REPORT

Page 6 of 8

Investigators:

Investigation Date: 10/11/78

Municipality: WOBURN

MDC: C. W. HEMBARD

Zip Code: 01891

B&V: R. J. DUNN JR.

Industry Name: TOHRI BUREAU Co

After tanning the hides are colored.  
Coloring - The hides are placed in drum tanks with various colored dyes. After the hides are dyed they are rinsed off (discharge) in a discharge tank - sedimentation tank - rinsed and sent to "fatliquoring" which is the last of the wet procedures.

"Fatliquoring" is the process where the leather receives tannin. There are obtained the good soft character. This process is done in drum tanks with the addition of oils + fatty substances. Any waste generated would be discharged the same day.

There are several other by-products for conditioning the tanned hides before it is shipped out, but none of them result in any discharge.

11/1/78 U. H. D.

METROPOLITAN DISTRICT COMMISSION  
INDUSTRIAL INVESTIGATION REPORT

Page 7 of 8

Investigators:

Investigation Date: 10/11/78 Municipality: WABURN  
Zip Code: 01801

MDC: CW LOMBARDI  
B&V: RT DUINN JR

Industry Name: BILEY Co.

Points of Interest:

- 1) Because this company has private wells there is no way ~~it~~ we can get an accurate discharge, but from appearance it is very large.
- 2) Although one could sample each individual wet operation the best sample point would be the sedimentation tank.
- 3) They do store chemicals @ various locations but none of these locations are necessary flow down.
- 4) No pH monitoring
- 5) Some old analytic data is available but should be updated.
- 6) Mr. Kibura not available but wants to meet with me 10/13/78
- 7) No cooling water used.
- 8) No machine shop work.
- 9) Industrial waste and domestic waste is degrease

11/17/78 CWT

METROPOLITAN DISTRICT COMMISSION  
INDUSTRIAL INVESTIGATION REPORT

Page 8 of 8

Investigators:

Investigation Date: 10/11/78

Municipality: WOBURN

MDC: C. W. Lombard

Zip Code: 01891

B&V: B. J. Duval Jr

Industry Name: RILEY Co

- 10) The sludge is cleared when necessary by a private company (name not available @ this time) and dumped onto the river.
- 11) There is no storm sewer from the sedimentation tank it goes to sewer.
- 12) All wastewater effluents are collected.
- 13) The area where the sedimentation tank is located is completely open and would collect a large amount of storm water.
- 14) All industrial wastes generated from the process are collected.
- 15) There is a dying profession but the work here has been fairly constant some 4 day weeks, some 5 day weeks.

11/1/78 CWL

INDUSTRIAL WASTE INVESTIGATION

SUMMARY REPORT ON

POSSIBLE VIOLATIONS

Industries Inspected the Week of: OCT 8-14, 19 78 Inspectors: MDC C.W. HARRIS  
B&V B.V. RUDOLPH

The City/Town of: WOBURN Zip Code: 01801

Inspection Date	NAME & ADDRESS	COMMENTS
10/11/78 10/13/78	JOHN RILEY CO 210 SALEM ST	VIOLATIONS EXSIST, LETTER REQUIRED DISCUSSED RESULTS OF insp.