United States Environmental Protection Agency Region III POLLUTION REPORT

Date: Saturday, July 4, 2009

From: Mike Towle

Subject: Stoney Creek Technologies

3300 4th Street, Trainer, PA Latitude: 39.8300000 Longitude: -75.3975000

POLREP No.: 15 Site #: Reporting Period: D.O. #:

Start Date:4/19/2007Response Authority:CERCLAMob Date:4/19/2007Response Type:Emergency

Demob Date: NPL Status:

Completion Date: Incident Category: Removal Action

CERCLIS ID #: Contract #

RCRIS ID #:

Site Description

See previous POLREPs for Site description information.

Since April 2007, the inventory at the Site contributing to the threats at the Site was steadily reduced. Currently, no production activity is occurring. EPA actions at the Site have added to the tracked chemical inventory through consolidation of material not previously tracked (e.g., tank bottoms) or otherwise identified. Additionally, over 100,000 gallons of oily material from the on-Site waste water pre-treatment system was consolidated into the tankage at the Site.

Approximately 5 million pounds of chemical inventory is consolidated into or remains in the on-Site storage tanks. An additional estimated 2 million pounds of chemicals are believed to remain in tank bottoms, equipment items, process vessels, and small containers. An unknown amount of chemical is located within the trenches, drains, and sewers.

Initially, approximately 18 million pounds of hazardous substances, oils, and contaminated waste waters were believed to be located at the Site. The waste waters were treated in the on-Site waste water pretreatment system and discharged. Stoney Creek Technologies and other Respondents to Unilateral Administrative Orders arranged for the removal of additional materials from the Site and over 3000 tons of contaminated ash.

Stoney Creek Technologies (SCT) is presently no longer able to assure that safety systems are operating at the Site. Neither SCT nor other Respondents are conducting response actions and EPA is using its own contractor resources to conduct actions at the Site.

Current Activities

Respondents to the EPA Orders still are not removing the remaining chemical inventory at the Site pursuant to the assigned Order requirements. EPA is now conducting removal actions.

EPA has conducted disposal activities resulting in the removal and off-site disposal of approximately 478,905 gallons of chemical inventory from 22 tanks. Disposal operations have been temporarily suspended as action priorities shift to consolidation of solvent-containing materials remaining at the Site.

EPA contractors (which still include some former SCT employees)support the removal action. Activities currently involve the intertank tansfer of chemical inventory and line clearing operations as part of an overall effort to consolidate solvent-containing materials on the Site. The solvents contribute to the potential for fire at the Site and the necessity of an inert atmosphere in tanks and vent systems.

EPA modified operations such that the on-Site nitrogen inerting system (which supplies nitrogen to all tanks) is no longer needed. Instead, the OSC directed actions such that solvent-containing materials are

consolidated into a limited number of tanks which can be dealt with on an individual basis. To this end, solvent-containing material has been removed from 25 tanks and the consolidating activies continue.

Additional activities continue to include monitorig and operation of the waste water pre-treatment facility. Periodic discharges of oily material into the pre-treatment plant continue even though no chemical manufacturing operations are occurring. Rainfall events appear to dislodge oily material from within the drainage system which courses throughout the facility. The oily material is separated and skimmed. The accumulated water is discharged to the nearby Stoney Creek from Tank 200. Two sampling events indicate that the discharge meets parameters which are lised in a potential NPDES permit which the PADEP previously calculated for the Site's discharge.

The OSC inspected the laboratory complex on the Site and found thousands of small containers (jars, cans, buckets) of various hazardous substances (e.g., oleum) and oils (e.g., alkylate). A preliminary evaluation of the chemicals intended to reduce the risk of fire identified numerous flammable materials (e.g., heptane, ether) which were segregated and returned to appropriate on-Site storage where possible. The OSC directed that thousands of containers of flammable or combustible chemical samples be consolidated into the on-Site tanks.

The OSC is now working with the EPA Environmental Response Team (ERT)to evaluate the source of an observed oily material discharging from the sidewalk outside of the facility onto the public roadway and then into the storm system which discharges to Stoney Creek. The oily material discharged from cracks in the sidewalk. The oily material was also observed discharging from cracks in the concrete and asphalt pavement within the site as well in the SACI area of the plant. The OSC has requested ERT install exploratory borings in an effort to locate a recovery system to prevent the discharge of oily material into the surface water.

A drum of oily material was found leaking on the exterior drum pad. The OSC directed that liquids be removed from the drums on the pad and placed into on-Site tanks. Additionally, drums containing heptane and alcohols or other materials were placed into structures with un-compromised roofing.

PADEP continues paying for electricity required to keep the plant safe. SCT has been unable to meet the conditions of the DEP Consent Order and, as such, it never became effective.

SCT is no longer able to demonstrate its viability pursuant to the EPA Order. Part of the demonstration requires SCT to have plans with critical utilities and to have regained its operating permits with PADEP. SCT continues to work towards financing.

The OSC continues to maintain a routine presence at the facility and is directing response activities relating to the on-Site waste water pre-treatment plant. EPA will remove oil and other contaminants from the tanks and basins associated with the on-Site waste water pre-treatment plant to assure that a release or discharge from this facility will not impact the nearby Stoney Creek.

Planned Removal Actions

Continue to consolidate solvent-containing material into a limited number of tanks. Complete operations in the calcium area of the Site.

Continue to monitor, treat, and discharge excess waters from the Site into Stoney Creek.

Evaluate response actions for the lab, small containers, and oily material discharge which threatens Stoney Creek. Modify the scope of the Action to include removal of these items.

Prevent oily material from migrating from the Site into Stoney Creek via discharges onto the adjacent public roadway.

Key Issues

Inadequate funding is available to the OSC to complete response actions.

response.epa.gov/stoneycreek