United States Environmental Protection Agency
Region III
POLLUTION REPORT

Date: Wednesday, September 30, 2009
From: Mike Towle

Subject: Stoney Creek Technologies
3300 4th Street, Trainer, PA
Latitude: 39.8300000
Longitude: -75.3975000

POLREP No.:	17	**Site #:**	
Reporting Period:		**D.O. #:**	
Start Date:	4/19/2007	**Response Authority:**	CERCLA
Mob Date:	4/19/2007	**Response 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.

Currently, no production or manufacturing activity is occurring at the Site and employees are not present. EPA has substantially completed the consolidation of the solvents, solvent-containing mixtures, and acids remaining at the Site. These materials have been removed from 45 tanks and consolidated into 15 tanks now being prepared for off-Site disposal. An additional eight tanks of former products or intermediates or raw materials are also prepared for disposal. 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. Over 472,000 gallons of material are now prepared for disposal.

EPA estimates that 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, pipelines, and sewers found throughout the Site.

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; therefore, EPA is using its own contractor resources to conduct actions at the Site.

On July 8, 2009, EPA Region 3 approved a modification to the scope of the Removal Action to include the removal of small containers (e.g., laboratory containers) and materials in the trenches and drains and other locations found throughout the Site. The modification also included activities to prevent the discharge of oily material or hazardous substances from the Site into Stoney Creek via discharges presently occurring outside of the Site boundary.

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 contractors (which include former SCT employees) are supporting the removal action. Removal activities currently involve the removal and consolidation of tank liquids and the drumming of tank sludges in preparation of disposal of acids and solvents. The OSC and START contactor are examining the tank inventory at the Site and determining if and when the tanks are no longer pose a threat (e.g., cleaned by EPA such that liquids and/or vapors are no longer present or at elevated concentrations). To date, 50 tanks have been cleaned or determined that no further action is needed to reduce the threat.

EPA is re-initiating disposal operations focused on solvent and acid materials. Fifteen tanks, used as consolidation tanks, are ready for disposal. An additional eight tanks, containing former products or intermediates or raw materials, are also ready for disposal. The 23 tanks ready for disposal contain a

combined (approximate) 472,000 gallons of materials. The materials consist of chemicals such as oleum, spent sulfuric acid, sulfonic acid, methanol, mineral spirits, and mixtures containing these materials. Disposal operations are expected to begin the week of September 28, 2009.

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). The flammable materials were then 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 also directed that sulfuric (non-fuming) and sulfonic acid sample containers also be consolidated. The sample consolidations are now completed. The contents have been consolidated into Tank 515 (sulfonate or oil or alkylate) or drums (acids), and the other containers have been crushed and prepared for disposal in cubic yard boxes.

EPA modified Site 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 is now ready to be removed from the Site. The OSC hopes to substantially reduce the potential fire threat at the conclusion of the disposal operations over the upcoming weeks.

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

The OSC continues to work 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. Based upon the results, a collection trench is proposed for installation alongside the Site boundary in the area of the oily material discharge.

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. The OSC is now implementing steps to disconnect all electricity from the Site and to re-establish power needs specifically for the waste water plant and a limited amount of security lighting.

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

Complete consolidation of acid and solvent-containing material into a limited number of tanks. Prepare consolidated materials for disposal.

Conduct disposal of 23 tank contents (totaling about 472,000 gallons) and consolidated laboratory containers.

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

Complete remaining response actions relating to the laboratory; small containers of acids, solvents, and other chemicals used to operate the lab need to be packaged for disposal

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

public roadway.

Complete air monitoring of tanks to examine the current fire threat posed by the Site.

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