

United States Environmental Protection Agency
Region III
POLLUTION REPORT

Date: Thursday, July 8, 2010

From: Mike Towle

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

POLREP No.:	23	Site #:	
Reporting Period:	2/1/10- 7/7/10	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.

Neither Stoney Creek Technologies nor any other Respondent to EPA's Orders or Potentially Responsible Party is conducting response actions due to bankruptcy, financial inability, or other reasons; therefore, EPA continues to use its own contractor resources to conduct response actions at the Site. EPA is securing the Site with guards, operating the waste water treatment plant to minimize the potential for a discharge of hazardous substances to the Stoney Creek, paying for critical utilities, and conducting cleanup operations at this sulfonate manufacturing facility in Trainer, Delaware County, PA.

EPA and its contractors have completed disposal of bulk liquid chemicals from the site. In June 2010, the bulk oleum in Tank 105 (estimated at approximately 6,500 gallons) was removed and disposed. EPA is currently conducting disposal of the drum inventory at the Site including disposal of drums generated by operations relating to the removal of chemicals from within the piping systems at the Site. The OSC continues to estimate that the remaining chemical inventory within the tanks at the Site is approximately 200,000 gallons and consists primarily of lower viscosity materials and tank heels in about 80 tanks.

The Removal Action has resulted in the removal of approximately 2,094,658 gallons of bulk chemical inventory. EPA has removed approximately 907,785 gallons. SCT has removed about 484,756 gallons. Chemtura has removed approximately 661,286 gallons, Soltex has removed approximately 40,851 gallons. Bulk disposal activities are now concluded. Only tank heels, some of which are significant (e.g., over 2000 gallons) and residuals remain.

The remaining Site threats include the chemical inventory residuals remaining in about 80 tanks, the trenches and drainage system leading to the on-Site waste water treatment plant, the piping systems and equipment and process vessels at the Site, and in numerous small containers,

Current Activities

The OSC and START completed an evaluation of the remaining tanks at the Site to determine potential threats posed by these tanks. Approximately 200,000 gallons of chemical residuals remain. EPA has directed the START contractor (now Weston) to assist in evaluation of the material consistency and vapor readings from the remaining tank contents to enable the OSC and ERRS contractor to develop strategies for prioritization and removal of remaining residuals.

EPA contractors have continued and still continue to break and drain lines and equipment and process vessels containing chemical inventory. Recent elevated temperatures have revealed additional leaks and drips of chemicals from piping systems and equipment into the Site's drainage system leading to the waste water treatment plant. The materials drained from the pipes are placed into drums. Since operations have included steaming of limited pipe segments, the OSC has directed that decontamination waters generated

by the operation are stored in Tank 460. Approximately 50,000 gallons of water is now in the tank from these and other decontamination operations (e.g., cleaning of certain trenches).

In June, ERRS added 93.8% sulfuric acid into the oleum tank in order to dilute the oleum and make it suitable for transportation as a waste. The OSC was unable to move the oleum off-Site as a product (due to organic contamination and its black color). Additionally, no entity was identified that would transport the fuming acid as a waste. After addition of the sulfuric acid, the tank contents were mixed using the facility's pump and a piping system installed by the ERRS contractor. Sufficient acid was added, approximately 5800 gallons, to render the oleum non-fuming. The acid mixture was subsequently disposed from the Site. Approximately 500 gallons of oleum sludge remains in the tank. This sludge fumes mildly upon contact with air.

Additional activities continue to include monitoring and operation of the on-Site waste water pre-treatment facility. The accumulated waters (storm water and commingled chemical residuals) are skimmed of oil and discharged to the nearby Stoney Creek from Tank 200. Sampling of the discharge verifies that proposed NPDES permit limits developed for SCT for the protection of Stoney Creek are met.

EPA is now paying for electricity and water service (through the fire protection system) required to keep the plant safe, operate the on-Site waste water treatment plant, and support decontamination activities. 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.

Planned Removal Actions

Treat (neutralize) oleum sludge and continue off-Site disposal of drummed wastes.

Evaluate next steps for wastes within roll off boxes and within the trenches and drains leading to the waste water treatment plant. Additionally, evaluate priorities for response actions to address the remaining wastes within tanks (e.g., low viscosity materials and tank heels). These activities must await approval of additional funding requested in a modification to the Action Memoranda for the Site presently awaiting headquarters approval.

Continue to clear pipelines of remaining chemical inventory, consolidate and prepare materials for disposal.

Continue to monitor, treat, and discharge excess waters from the Site into Stoney Creek and prevent oily material from migrating from the Site into Stoney Creek via discharges onto the adjacent public roadway.

Next Steps

The OSC is currently evaluating the threats that may remain after bulk chemicals are removed and flammable liquids and acids are drained from pipelines. The current funding level of the EPA Action does not include addressing residual materials throughout the plant (e.g., those wastes within the trenches leading to the waste water plant or seeping from on-Site soils into the waste water plant or which are low viscosity materials and existing as tank heels). The OSC revised the Action Memorandum for the Site with new scope and funding necessary to complete removal activities. That revised Action Memorandum is awaiting headquarters approval.

Disposition of Wastes

Disposal activities include disposal from individual tanks, tank consolidations, and a variety of drums. Single manifests may include wastes from multiple sources. Wastes are primarily disposed as corrosive (acids and caustics), flammable (items containing solvents), and non hazardous (primarily oil-based materials).

Waste Stream	Quantity	Manifest #	Disposal Facility
T-132	22,200 gal.	various (D002)	Vickery Env. Inc., Vickery, OH
T-134	7,900 gal.	various (D002)	Vickery Env. Inc., Vickery, OH
T-171	22,363 gal.	various (D001)	Clean Harbors, Baltimore, MD
T-172	13,816 gal.	various (D001)	Clean Harbors, Baltimore, MD
T-174	3,800 gal.	various (D001, D002)	Clean Harbors, Baltimore, MD

T-174	42,464 gal.	various (D001)	Clean Harbors, Baltimore, MD
T-176	35,621 gal.	various (D001)	Clean Harbors, Baltimore, MD
T-198	3,960 gal.	various (Non-Haz)	FCC Environmental, Wilmington, DE
T-201	10,742 gal.	various (D001)	Clean Harbors, Baltimore, MD
T-337	11,190 gal.	various (Non-Haz)	Env. Recycling Corp., Lancaster, PA
T-340	19,967 gal.	various (Non-Haz)	FCC Environmental, Wilmington, DE
T-401	5,000 gal.	various (D001, D002, D003)	Clean Harbors, El Dorado, AR
T-406	24,375 gal.	various (D001)	Heritage WTI, East Liverpool, OH
T-407	14,892 gal.	various (D001, D002)	Clean Harbors, Baltimore, MD
T-411	12,776 gal.	various (D001)	Clean Harbors, Baltimore, MD
T-420	10,004 gal.	various (D001)	Casie Protank, Vineland, NJ
T-421	9,010 gal.	various (D001)	Casie Protank, Vineland, NJ
T-422	7,661 gal.	various (D001)	Clean Harbors, Baltimore, MD
T-424	8,638 gal.	various (Non-Haz.)	FCC Environmental, Wilmington, DE
T-425	8,450 gal.	various (D001)	Clean Harbors, Baltimore, MD
T-431A	32,631 gal.	various (D001, D002, D003)	Clean Harbors, El Dorado, AR
T-437	23,470 gal.	various (D001, D002)	Clean Harbors, Baltimore, MD
T-495	3,701 gal.	various (D001)	Clean Harbors, Baltimore, MD
T-521	16,667 gal.	various (Non-Haz.)	Env. Recycling Corp., Lancaster, PA
T-525 (Mar. 09)	69,561 gal.	various (Non-Haz.)	FCC Environmental, Wilmington, DE
T-525 (Jan. 10)	45,050 gal.	various (sludge)	Republic, Hatfield, PA and Veolia ES Greentree, Kersey, PA
T-526 (Mar. 09)	46,592 gal.	various (Non-Haz.)	FCC Environmental, Wilmington, DE
T-526 (Jan. 10)	30,340 gal.	various (sludge)	Republic, Hatfield, PA
T-527 (tank bottom)	7,775 gal.	various (D001)	Clean Harbors, Baltimore, MD
T-527 (tank top)	10,287 gal.	various (Non-Haz.)	FCC Environmental, Wilmington, DE
T-539 (Feb. 09)	19,354 gal.	various (Non-Haz.)	Env. Recycling Corp., Lancaster, PA
T-539 (Oct. 09)	22,625 gal.	various (D001)	Clean Harbors, Baltimore, MD
T-640	34,208 gal.	various (Non-Haz.)	FCC Environmental, Wilmington, DE

T-641	30,609 gal.	various (Non-Haz.)	FCC Environmental, Wilmington, DE
T-660	30,750 gal.	various (D001)	Clean Harbors, Baltimore, MD
T-661	21,264 gal.	various (Non-Haz.)	Env. Recycling Corp., Lancaster, PA
T-663	41,010 gal.	various (Non-Haz.)	FCC Environmental, Wilmington, DE
T-680	17,013 gal.	various (Non-Haz.)	FCC Environmental, Wilmington, DE
T-681	20,339 gal.	various (Non-Haz.)	FCC Environmental, Wilmington, DE
T-105	12,608 gal.	various (D002)	Vickery Environmental, Vickery, OH

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