

United States Environmental Protection Agency
Region III
POLLUTION REPORT

Date: Thursday, May 10, 2007

From: Mike Towle

Subject: Stoney Creek Technologies
3300 4th Street, Trainer, PA
Latitude: 39.8300000
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POLREP No.:	3	Site #:	
Reporting Period:	4/26/07 to 5/10/07	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

The On-Scene Coordinator (OSC) initiated a response action at the Stoney Creek Technologies Site on April 17, 2007. The conditions at the Site, the threats posed by the Site, and the response actions taken by the OSC are documented in POLREP 01 and Special Bulletin A. POLREP 02 and Special Bulletin B were issued on April 26, 2007 and provided additional information related to the threats posed by the Site and identified and clarified actions that may be taken to minimize the threat of a release of hazardous substances from the Site. The OSC continues to conduct a removal site evaluation pursuant to the National Oil and Hazardous Substances Pollution Contingency Plan (NCP).

The Site is the location of Stoney Creek Technologies' chemical manufacturing facility. The removal site evaluation identified the existence of a threatened release of hazardous substances posing a significant threat to public health or welfare or the environment. Stoney Creek Technologies is experiencing serious financial difficulties and may not be able to safely operate its facility and/or maintain the safety of the chemicals therein for much longer. The OSC evaluated Site conditions against the factors contained in Section 300.415 of the NCP and determined on April 17, 2007, that immediate response activities pursuant to Section 104 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended, were necessary to begin to mitigate the immediate threats posed by the Site. Pursuant to Delegation of Authority 14-2, the OSC authorized the expenditure of CERCLA funding in an amount not to exceed \$250,000 to initiate an emergency Removal Action to prevent a release of hazardous substances stemming from tanks and containers of flammable chemicals, combustible chemicals, acid chemicals, and combinations of these and other chemicals as well as from these same types of chemicals located within trenches, pipes, equipment, and other locations throughout the facility. The OSC must take actions especially in the event that the current operator of the facility is unable to continue to do so.

In POLREP 01 and Special Bulletin A, the OSC identified actions to take to minimize the threat of release of hazardous substances. Among those actions was the need to identify, evaluate, and arrange for or operate facility systems (e.g., nitrogen system), or take other similar actions, to minimize the potential for fire or chemical reaction or release. POLREP 02 and Special Bulletin B clarified this action item to include the removal of chemical product inventory or operation of facility systems that result in the removal of chemical product inventory from the Site as a means to minimize the potential for release of hazardous substances from the Site. The OSC determines that removal of chemical product inventory from the Site, or safe operation of the facility systems by the Company that result in a reduction of on-Site inventory, will facilitate the reduction of threat by removing the chemicals that contribute to the threat of a release. As such, the OSC may consider limited activities by the Company as it manufactures chemicals to be consistent with the overall intent and scope to reduce the threats posed by the Site provided that the Company operates consistent with the direction of the OSC and operates the facility's safety systems (e.g., nitrogen system). The OSC communicated this potential action item to the Pennsylvania Department of Environmental Protection which acknowledged its benefit provided it is directed by the decision of the OSC.

Current Activities

(A) Following issuance of Special Bulletins A and B, the OSC or OSC representative has maintained a daily presence at the facility during production timeframes. The OSC/OSC rep routinely meets with production and environmental, health and safety management personnel to discuss projected and completed activities for the day per the requirements outlined in Special Bulletin B.

(B) An activities log is prepared and maintained which describes production activities, incoming and outgoing materials, systems operation status and any maintenance incidents/issues of importance. The facility is currently engaged in several production operations, including tank transfers, milling, sulfonation, degassing, and stripping. Several products were shipped to customers. Materials critical for facility safety (nitrogen) and production materials needed to reduce the chemical inventory contributing to threat (fuel oil, CO₂ and CaOH) were brought into the plant.

(C) The OSC issued a Task Assignment and obtained START services during the week of April 26. The START contractor (Tetra Tech) will provide technical evaluation to the OSC.

(D) The OSC, OSC rep and START contractor conducted several site walkthroughs during this period to observe and gain a greater understanding of facility treatment operations, storage areas and production processes. Specific attention was focused on the facility's solvent recovery unit (SRU), co-product/fly ash piles, drum staging area and wastewater treatment system.

(E) A business confidentiality and site access form was prepared and agreed to by EPA and Stoney Creek Technologies. Essentially, all site visitors, including government and contractor personnel, will be required to sign this form upon initial entry to the facility to ensure that confidential material is controlled.

(F) The OSC awaits responses to the three notice of potential CERCLA liability letters issued on April 27. The deadline for response is May 11.

(G) The OSC continues to provide routine status updates to PADEP SE Regional Office personnel.

(H) On May 3, the OSC attended an Environmental Advisory Council meeting to explain EPA's role at the facility. The meeting is attended by a representative of each facility working in the local area.

(I) On May 7, EPA's Community Relations Coordinator and PADEP's Environmental Advocate were onsite to obtain a briefing from the OSC.

The discussion focused on community outreach issues including community interest to date and future efforts to keep residents informed.

Planned Removal Actions

(A) At this time, the OSC is continuing to work through the facility to continue production in an effort to reduce the inventory while preparing to work with PRPs to develop a longer-term plan to mitigate the threats posed by the Site.

Next Steps

(A) For the immediate future, the OSC plans to allow the Company to remove existing inventory from the facility through approved production processes. The OSC plans to maintain a site presence during chemical production activities.

(B) Pending receipt of a response(s) and proposal(s) by site PRPs on May 11, the OSC is working to determine what additional measures are needed at the facility to mitigate site threats.

(C) The OSC will evaluate potential releases from the Solvent Recovery Unit possibly through the performance of testing intended to help determine if ongoing production activities pose a release outside of anticipated (e.g., permitted) levels.

Key Issues

(A) The facility continues to operate in a limited capacity.

(B) Potentially Responsible Parties are responding to EPA's Notice of Potential CERCLA Liability on May 11, 2007.

