

**United States Environmental Protection Agency
Region III
POLLUTION REPORT**

Date: Tuesday, July 10, 2007

From: Mike Towle

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

POLREP No.:	5	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

The On-Scene Coordinator (OSC) initiated a response action at the Stoney Creek Technologies Site on April 17, 2007 after evaluating the threats posed by the Site. 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. Stoney Creek Technologies continues to operate its systems to safeguard the inventory and to reduce the inventory through sale of manufactured products into the stream of commerce.

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) The OSC continues to maintain a routine presence at the facility during production timeframes.

(B) An activities log is maintained which describes production activities, incoming and outgoing materials, systems operation status and any maintenance incidents/issues of importance. The facility continues limited production operations, including tank transfers, milling, sulfonation, degassing, and stripping. Products totaling approximately 972,935 pounds were shipped to customers through June 2007. 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. Additionally, oleum, methanol, and alkylates were brought to the Site to continue production activities after the OSC verified that the net result of such production would reduce overall inventory at the Site.

(C) Potentially responsible parties responded to EPA's Notice of Potential CERCLA Liability on May 11th and responded that they have chemical materials existing at the Site. The PRPs basically agreed to assist in the conduct of the removal action. Of significant concern is how much material to simply remove "as is" and how much material is best processed into chemical products before removal. Some materials have already been directly removed by one of the PRPs and this activity is ongoing.

(D) The OSC has received information from DELCORA (Regional Waste Water Treatment Authority) that they desire to remove the facility's increased wastewater discharge whenever it rains from their sewer system and have ordered SCT to do so. DELCORA informs the OSC that SCT is behind in its payments to the authority for the use of the sewer and has requested payment of the ability for continued use of the sewer system.

(E) The OSC has been contacted by PECO (local provider of electricity) that they request payment for natural gas service provided to date. There are 3 accounts that are past due. SCT indicated that it can pay the account needed for its flare, but is unable to pay other accounts (heating and production). PADEP is currently paying for electricity.

(F) The OSC arranged for the conduct of analytical testing/sampling of emissions from the solvent recovery system to document emission amounts whilst the Company's Title V permit is suspended. The data will be used to show if the substantive requirements of environmental regulations are met by the ongoing actions.

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

(H) The OSC routinely updates that Environmental Advisory Council and has briefed local elected officials and emergency managers in Trainer and the adjacent City of Chester.

Planned Removal Actions

(A) At this time, the OSC continues to work with the Company to continue production in an effort to reduce the inventory while working another PRP to remove or otherwise process inventory from the Site. The OSC is also preparing to determine the information needs for determining when sufficient inventory is removed or if conditions changed such that the threats at the Site are mitigated.

(B) The OSC is planning to collect samples of wastewaters discharged from the Site in order to document if ongoing actions meet the substantive requirements of environmental regulations relating to the discharge of the wastewater

Next Steps

(A) For the immediate future, the OSC plans to continue 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) Work with PRPs to continue reduction of inventory through removal or production.

(C) Collect samples of wastewater discharge.

Key Issues

None

