

United States Environmental Protection Agency
Region III
POLLUTION REPORT

Date: Monday, October 1, 2007

From: Gregory Ham

Subject: Reinspection of facility

Consolidated Pharmaceutical Group

6110 Robinwood Road, Brooklyn Park, MD

Latitude: 39.2083000

Longitude: -76.6278000

POLREP No.: 2

Reporting Period: July 5, 2007 - September 28, 2007

Start Date:

Mob Date:

Demob Date:

Completion Date:

CERCLIS ID #:

RCRIS ID #:

Site #: A3JH

D.O. #:

Response Authority:

Response Type:

NPL Status:

Incident Category:

Contract #

Site Description

The Consolidated Pharmaceutical Group (CPG) is a facility just south of Baltimore, Maryland, that facility formerly manufactured various antibiotics, and had shut down approximately eight years ago. The facility contains a tank farm of 20 tanks (ranging from 5,000 to 20,000 gallons), some of which still contain hazardous substances. In addition, over 100 drums of various substances, including alcohols, solvents, acids, and basic solutions, are stored inside the building. A laboratory on the second floor of the building contained lab bottles of numerous chemicals, most of which were in very poor condition (these have been removed). Also, hundreds of containers of antibiotics (mostly off specification or quarantined) in pill and powder form are stored throughout the building. Roof leaks have resulted in many of these containers being in deteriorated condition.

Current Activities

The company continues to make efforts to sell the materials, but to date has only had minimal success. Lab and maintenance shop wastes have been shipped offsite for disposal, but over 50,000 gallons of hazardous substances, pollutants, and contaminants remain onsite.

On Friday, September 28, 2007, EPA and MDE conducted a followup inspection of the facility. Much work has been done by CPG to organize the waste materials onsite, inventory the materials, and address the general safety issues at the plant (stacks of pallets up to five high in warehouse aisles, presenting a serious safety hazard, and preventing full inspection of materials onsite). However, several of the tanks in the tank farm area continue to be in poor condition. The scrubber on the Hydrochloric acid tank (which based on EPA samples also contains a small amount of sulfuric acid) is not working properly and is venting an acid mist. The scrubber is also leaking acid with a pH of 1 all over itself. The tank adjacent to the HCL tank contains triethylamine. The pumping and piping on the top of this tank is significantly corroded, most likely from the HCL scrubber discharge that vents beside the TEA tank. The pump servicing the TEA tank is corroded and non-functional, and there is a vent line coming from the top of this tank that feeds into a five gallon plastic bucket. This bucket contains liquid with a pH of 11 in it. During a past inspection vapor levels as high as 700 parts per million were observed near the acetone tank, indicating a possible leak. Several of the tanks in the tank farm area had oil-dry material and/or drip pans placed under areas of the tank or piping associated with the tanks to collect leaks. 115 drums of hazardous substances, pollutants, and contaminants remain stored inside the building, along with hundreds of containers of antibiotics and feed materials for antibiotics.

Planned Removal Actions

The Maryland Department of the Environment (MDE) has issued an order to the facility to remove all the hazardous substances. The company has appealed the order. EPA will continue to support MDE in this matter, and will evaluate the situation to determine whether additional EPA action is warranted.

Next Steps

Continue overseeing actions at the facility. Take action as needed.

