ENVIROPLAN CONSULTING

ENVIRONMENTAL AUDIT OF DAMASCUS/BISHOP FRAZER, PA FACILITY

PREPARED BY:
ENVIROPLAN CONSULTING

PERFORMED FOR:
DAMASCUS/BISHOP TUBE

November 19, 1997
Reference No. 1668-15

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1.0 INTRODUCTION

On October 13 & 14, 1997 Walter Fridley and Allen Dittenhoefer of Enviroplan Consulting (EC) performed a limited environmental audit of the Damascus-Bishop Tube (DBT) facility in Frazer, PA. DBT personnel to whom EC spoke included Messrs. Bruce Johnson, James Wollard, Kent Lulewich, Russell Levering, and representatives of DBT's electrical contractor. The primary DBT participants were Messrs. Johnson and Levering. In addition to meetings, there was a reconnaissance of the facility and a review of environmental records. DBT requested that the audit focus on the period of time that the Marcegaglia Group (Marcegaglia - DBT's parent company) had operated the facility.

According to information provided to EC, Marcegaglia purchased the assets of Christiana Metals in late 1991 or early 1992. Christiana Metals continues as the property owner. DBT occupies the property as a tenant of Christiana Metals. Prior to Marcegaglia, the plant reportedly was operated by Alloy Steel, which filed for bankruptcy in January 1991. Christiana Metals acquired the assets of Alloy Steel as a result of the bankruptcy. The plant did not operate between January 1991 and May 1993. In this period, the equipment and materials, including chemicals, associated with acid pickling and Trichloroethylene (TCE) degreasing activities, were removed from the site and disposed. Operations under the ownership of Marcegaglia began in mid-1993 and under this ownership neither acid pickling nor TCE degreasing operations have been conducted at the facility.

DBT is aware of certain environmental concerns (e.g., groundwater contamination) that may have been associated with the prior operation of on-site acid pickling and TCE degreasing activities. EC was advised by DBT that they were in no way involved with those past activities; therefore, they were not included in EC's investigation. DBT's on-site ownership is limited to production, mobile, and office equipment, plant inventory, etc. Christiana Metals owns the property including the on-site electrical transformers and distribution system; however, it is EC's understanding that DBT is responsible for routine maintenance of electrical equipment.

2.0 PCBs

EC's PCB investigation included a review of records and a plant reconnaissance. During the plant walk-through, two electrical substations were observed. One of the substations (main substation) is connected to the power company's distribution system. The other substation (secondary substation) is used to further step-down the voltage for in-plant usage. Both substations are located out-of-doors. The main substation consists of four (4) transformers (three (3) 500 KVA single-phase transformers and one (1) 1000 KVA three-phase transformer). The switchgear for this substation is contained in an adjacent concrete block powerhouse. According to DBT's electrical contractor, there is one (1) oil switch inside the powerhouse. There are nine (9) single-phase 100 KVA transformers in the distribution substation. In addition to the transformers and oil switch, information provided to EC by BDT's electrical contractor indicated the presence of eleven (11) liquid-filled capacitors. Neither information on the physical size nor liquid capacity of the capacitors was provided.
The four (4) transformers in the main substation have been tested for the presence of PCBs. The PCBs levels, as indicated by information provided to EC, are as follows:

- American Brown Boveri 500 KVA SN C-114947 - 4.0 ppm PCBs
- General Electric 500 KVA SN 6821373 - 193 ppm PCBs
- General Electric 500 KVA SN 6821374 - 206 ppm PCBs
- Westinghouse 1000 KVA SN 5064214 - <1 ppm PCBs

EC observed that the above listed transformers were labeled as to PCB content.

EC's investigation did not reveal any information to indicate that the oil switch in the main substation powerhouse, the nine (9) transformers in the distribution substation, or the eleven (11) capacitors had been tested for the presence of PCBs. EC has reviewed the PCB regulations at 40 CFR 761 and discussed the regulations with DBT's outside environmental counsel Robert Thomson. It is the shared opinion of EC and DBT's counsel that DBT assume all liquid filled electrical equipment to be "PCB Contaminated Electrical Equipment"

(i.e., greater than 50 ppm PCBs but less than 500 ppm PCBs), as defined by the regulations, until such time as the equipment is sampled and found to be otherwise.

EC's review of the regulations at 40 CFR 761 did not indicate any requirement to sample liquid filled electrical equipment; however, the equipment must be assumed to be PCB contaminated (until sampling indicates otherwise). The regulations at 40 CFR 761.30 (Authorizations); 40 CFR 761.40 (Marking of PCBs and PCB Items); and 40 CFR 761.180 (Subpart J - Records and Monitoring), are applicable to PCBs, PCB Items, PCB Transformers, and PCB Capacitors (500 ppm PCBs or greater, by definition). The regulations at 40 CFR 761.40 specifically state that "marking of PCB-Contaminated Electrical Equipment is not required".

Two (2) of the 100 KVA transformers had indications of staining around the bottom of the units; however, the confines of the substation and the transformers being energized prevented a physical investigation. It is EC's recommendation that all of the 100 KVA transformers and other liquid filled items of electrical equipment (capacitors and oil switch) be investigated for leaks and repaired or removed from service in accordance with the 40 CFR 761 regulations. The regulations at 40 CFR 761 (Subpart G - PCB Spill Cleanup Policy) apply to spills of PCBs of 50 ppm or greater; therefore, since it is assumed, as set-forth above, that the 100 KVA transformers contain PCBs greater than 50 ppm, the cleanup regulations are applicable. The 40 CFR 761 regulations, especially Subpart B (Manufacturing, Processing, Distribution in Commerce, and Use of PCBs and PCB Items), Subpart D (Storage and Disposal), and Subpart K (PCB Waste Disposal Records and Reports) would apply to any transformers removed from service. The regulations at 40 CFR 761 Subpart B and Subpart G would apply to areas in the secondary substation where the transformers are located, if there have been spills of materials containing PCBs at concentrations of 50 ppm or greater.

Discussions with DBT's electrical contractor, indicated that it may be possible to remove three of the 100 KVA transformers from service. It is EC's recommendation that, if either of

the 100 KVA transformers with indications of staining have leaked, they be removed from service. If permitted by the regulations, the third transformer removed from service would be
used as a spare for the six (6) transformers that are to remain in service. EC's investigation did not determine if there are fluorescent light ballasts in the plant that are subject to 40 CFR 761; however, according to BDT, there are no hydraulic units in the plant to which the PCB regulations apply.

Should future PCB testing and investigation indicate the presence of PCBs, at levels that make any items of equipment (transformers, capacitors, oil switch, or fluorescence light ballast) subject to the regulations at 40CFR 761, it is EC's recommendation that BDT initiate the required actions to comply (with the PCB regulations at 40 CFR 761). As indicated herein in the section entitled "Waste Storage and Disposal", EC's review of DBT's manifest records indicates that light ballasts have been shipped off-site for disposal since Marcegaglia has operated the facility. "Fluorescent light ballast" is defined in Subpart A of the regulations.

The PCB regulations at 761.30(a)(1)(xv) set-forth the requirements for when a transformer that has been assumed to contain less than 500 ppm PCBs is found to contain greater than 500 ppm PCBs. The requirements include, but are not limited to:

- Immediate reporting of fire related events
- Marking within 7 days of discovery
- Registering with fire response personnel within 30 days of discovery

The recordkeeping and monitoring provisions of 40 CFR 761.160 (Subpart J) would be applicable to any equipment where testing indicated a PCB concentration at 500 ppm or greater.

3.0 ASBESTOS

On July 11 and 21, 1995, Smith Environmental Technologies Corporation (Smith) conducted
a Phase I Environmental Assessment of the DBT facility in Frazer, PA. A draft of the report was transmitted to David Lewis of DBT under cover of a letter dated August 21, 1995. Section 5.1 of the report is entitled "Hazardous Substances In Connection With Identified Uses". A sub-heading of Section 5.1 is labeled "Asbestos". A table in this section identifies 13 assessable areas that were visually inspected by Smith for potential asbestos-containing materials (PACM). The pipe wrap (insulation) in both Plant 8 and Plant 5 (two locations in each plant) was identified as being friable and in poor condition. All other PACM was indicated to be non-friable.

During EC's site reconnaissance of October 13 and 14, 1997, pipe insulation in several locations in Plant 5 was observed to be friable and in poor condition. EC concurs with the Smith report that the material is PACM. In addition, EC observed an inactive boiler room in Plant 5. The boiler and much of the equipment and piping is in-place and insulated with
friable PACM.

DBT did not provide any information as to whether there had been any effort to ascertain whether the material identified by Smith was PACM or ACM; however, Russell Levering stated that there was no asbestos pipe wrap in the present Plant 8. EC was provided with a copy of a manifest indicating that 85 bags of asbestos were shipped off-site for disposal on May 17, 1996. None of the PACM observed by EC in Plant 5 was labeled as PACM or ACM and access to areas was not restricted. Not observed by EC were several sealed boxes containing asbestos pipe wrap that are reportedly stored in the plant. EC does not know if the alleged material belongs to DBT or the property owner.

EC has reviewed the asbestos regulations at 29 CFR 1910.1001 (General Industry Standards) and believes them to be applicable to the DBT Frazer, PA facility. It is EC's recommendation that all friable asbestos be treated in accordance with the regulations.

The old boiler room should be locked and all entrances identified with the appropriate warning signs. DBT should review the asbestos regulations as relate to warning signs and labels (29 CFR 1910.001 (j)(3) and (j)(4) and employee information and training (j)(7), and
recordkeeping (m). The notification and training should be extended to non-DBT employees who may be employed to perform maintenance and housekeeping activities [29 CFR 1910.1001 (k)] where both friable and non-friable asbestos materials are located. Prior to engaging in asbestos remediation, labeling, and training activities, EC recommends that DBT review the asbestos regulations with their environmental legal counsel to determine the applicability of the regulations, the extent of the work required to comply with the regulations, and who (DBT and/or the property owner) is the responsible party.

4.0 WATER POLLUTION CONTROL

4.1 NPDES Permit & PPC Plan

According to Russell Levering, he began work at the facility in 1975. Prior to his employment, all plant waste water was discharged without treatment into an unnamed tributary of Little Valley Creek. (The stream is located on the east side of the facility and flow is northerly.) According to Levering, this practice was discontinued in the late 1970's. The plant has a current NPDES permit for the discharge of non-contact cooling water from operations such as the cooling towers, air compressors, and heat exchangers. Waste emulsion water used in roll lubrication is recirculated, collected, and disposed off-site. There is an off-site reservoir with in-place piping for fire protection. City water and wells are the water source. This system is not in use.

The NPDES permit was transferred to BDT under cover of a January 5, 1993 letter from the Pennsylvania Department of Environmental Resources (PADER - The agency is presently know as the Pennsylvania Department of Environmental Protection (PADEP) and will be referred to by that acronym elsewhere herein). The request to transfer the permit was made

on July 17, 1992. The January 5, 1993 letter advised that the expiration date of the permit was March 20, 1994.

The PADEP issued DBT a NPDES Permit (PA 0013641) dated July 29, 1994. In a letter dated February 23, 1995, the PADEP issued Permit Amendment No. 1. The effective date of the amendment was March 1, 1995. The expiration date of the permit (July 29, 1999) was unchanged. The permit identifies three (3) outfalls (001, 002, and 003). Outfall 001 is for non-contact cooling water. Outfalls 002 and 003 are for storm water runoff. Weekly monitoring is required at Outfall 001. Outfall 002 is required to be monitored once every six months. There are no monitoring requirements at Outfall 003.

Apparently, DBT has filed discharge monitoring reports (DMRs) for Outfall 001, since the permit was issued. The flow was indicated as zero in all of the DMRs that EC reviewed.

It is not known if DBT has filed DMRs for Outfall 002. A communication entitled "April 6, 1995 Strategy Meeting - Draft Meeting Agenda", which appears to have been prepared by BCM Engineers, Inc., addresses the NPDES Permit and PPC Plan compliance. (It is not known if the meeting was held.) The agenda covers monitoring at Outfalls 001 and 002, an annual inspection of Outfall 003, and an annual "comprehensive site compliance evaluation". The agenda indicates that BDT is "currently performing weekly sampling and monthly reporting." The agenda states that BCM will perform semi-annual sampling and lab analyses for Outfall 002.

EC was provided with a copy of DBT's Preparedness, Prevention, and Contingency Plan (PPC Plan) dated June 24, 1994, which was prepared by BCM Engineers Inc. (BCM). In a letter dated January 25, 1997, the PADEP acknowledged that the PPC Plan had been found to "provide adequately for the prevention of potential pollution" (i.e., it had been approved by the agency).

In a letter dated August 17, 1995, from Smith, there is a proposal to conduct an annual

inspection of Outfall 003 and a comprehensive site compliance evaluation. It is assumed that this proposal, or a revision thereof was approved by DBT since, in a letter dated January 29, 1996, there is a report of Smith having performed the "Storm Water Outfall Inspection" project, including Outfall 003, on October 31, 1995. The letter was addressed to David J. Lewis who at the time was the DBT's Assistant Plant Manager.

It is not known if BCM currently is performing the sampling and analyses for Outfall 002 (as specified in the NPDES Permit), or the inspections at Outfall 003 and the annual site compliance evaluation (as specified in the PPC Plan). And, it is not known if the information contained in Smith's letter of January 29, 1997 was transmitted to the PADEP.

As indicated above, Amendment No. 1 to DBT's NPDES Permit was issued on July 29, 1994 and their PPC Plan was approved, and made a part of the facility's NPDES file, on January 25, 1995. EC's review of these documents indicates that DMR's for Outfall 001 are required to be submitted monthly, beginning with August 1994 and monthly thereafter. EC observed copies of several DRMs but did not ascertain if DMRs had been filed monthly from August 1994 to date. Other than as stated above, EC found no reference to sampling and/or inspections of Outfalls 002 and 003. EC's review indicates that as of the date of EC's records audit (October 1997), semi-annual monitoring of Outfall 002 should have been performed once in 1994 and twice in 1995 and 1996. In regard to 1997, monitoring should have been performed one time during the first six months of the year with an additional monitoring to be conducted before year's end.

EC spoke with Kent L. Lulewich, Plant Manager, who joined DBT in the Spring of 1997, concerning the submission of the DMRs. Mr. Lulewich was unaware of the Outfall 002 (NPDES monitoring) and Outfall 003 (PPC Plan) requirements; however, he acknowledged that the Outfall 001 DMRs were being filed. It is EC's opinion that Mr. Lulewich was not made aware of the Outfall 002 and Outfall 003 reporting requirements by his predecessor. DBT needs to ascertain if there has been any reporting to the PADEP relative to Outfalls 002 and 003. And, if Smith has performed monitoring of Outfall 002 and inspections of 003 other than as set-forth in their communication of January 29, 1996.

EC recommends that the PPC Plan be reviewed, revised and implemented by DBT. The revised plan should be sent to the PADEP for approval. Section 12.0 of the PPC Plan sets-forth an inspection and monitoring program which includes recordkeeping provisions. EC was not provided information relative to the program's implementation nor were any records of inspections provided.

This audit is not intended to be a critique of the PPC Plan; however, in its review, in addition to the aforementioned Section 12.0 provisions, EC found incidents where the Plan may not be current (e.g., the status of chemicals on-site, reporting requirements, responsibilities assigned to persons who are former employees).

According to Russell Levering, all waste water is discharged to the Valley Forge Sewer Authority (VFSA). The discharge consists of:

- Oil/water separator waste water
- Air compressor waste water
- Cooling tower blowdown
- Sanitary waste water

EC was provided with a letter from the VFSA dated September 16, 1994. The letter, addressed to Russell Levering, requested that VFSA be provided with analyses of cooling tower and air compressor condensate for a list of parameters. Mr. Levering recalled that DBT had complied with VFSA's request; however, there was no confirming information in the files.

4.2 SPCC PLAN

The regulations at 40 CFR 112.1 require that facilities that store, transport, or handle oil that could be reasonably expected to discharge in harmful quantities into navigable waters are required to prepare a Spill Control and Countermeasure Plan (SPCC Plan) if on-site storage thresholds are exceeded. Harmful quantities and navigable waters are so defined that almost
any leak or spill to any watercourse will meet the definitions. The on-site storage thresholds are as follows:

- 42,000 gallons of underground storage

- 1,320 gallons of aboveground storage or a single container in excess of 600 gallons

The on-site storage tanks are as follows:

- A partially buried empty 20,000 tank under the floor of Building #8. According to DBT, the tank was used to store fuel oil but was drained and has been empty for several years, including the period of time that the facility has been operated by Marcegaglia.

- A 1,450 gallon tank that is used to store waste water containing emulsified oil. According to DBT, the mixture is mostly water and the quantity of oil in the tank would not exceed the 660 gallon single container threshold.

- An 8,000 gallon aboveground tank that was formerly used to store anhydrous ammonia. According to DBT, the tank was purged and has been empty for several years.

- A tank formerly used to store gasoline was removed from the site.

- An aboveground propane tank that is for forklift fuel storage.

EC was advised that total on-site oil storage did not exceed 1,320 gallons and there was no single container in excess of 660 gallons. Most oil is stored in 55 gallon drums. Based on the information provided to EC, the DBT facility does not require a SPCC Plan.

The regulations on Underground Storage Tanks (USTs) are found at 40CFR 280. BDT needs to make a determination if the regulations are applicable to the aforementioned partially-buried 20,000 gallon storage tank. Subpart G of this part addresses "Out-of-Service UST Systems and Closure". In this regard, it should be determined whether BDT or Christiana Metals is the responsible party. It is EC's understanding that the tank was in its present condition when Marcegaglia began on-site operations.

5.0 WASTE STORAGE & DISPOSAL

Prior to Marcegaglia's on-site presence, the following wastes were disposed off-site:

- Spent pickle acid and rinsewater
- Trichloroethylene sludge
- Waste oils
- Safety-Kleen (recycled)
- Grinder and polishing sludge
- Cut-off saw dust
- Pickle tank sludge

During EC's site reconnaissance, drilling cores and 75 to 80 drums (55 gallon) of drilling waste were observed in a storage area south of Building #5. According to DBT, the drummed waste and cores are from the construction of monitoring wells that were constructed as part of a Christiana Metal's subsurface investigation. DBT has no direct knowledge of the chemical composition of the drummed material.

Drums of what was reported to be process related non-hazardous waste were located east of Building #5. It is EC's understanding that the waste in these drums was generated by recent DBT operations.

EC's review of DBT's manifest file indicated the following off-site waste shipments:

- Safety-Kleen (1994)
- Non-hazardous sludge (1994)
- Groundwater containing Trichloroethylene (1996)

- Waste oil (1996)
- Light ballast (1996)
- Asbestos (85 bags) (1996)
- Waste acid (1997)
- Waste oil (1997)

EC has reviewed the hazardous waste regulations ar 40 CFR 260. None of the provisions at this part appear to be applicable to BDT's Frazer, PA facility; however, EC recommends that DBT review the Part 260 regulations, in particular the definitions contained in Subpart B.

DBT should acquaint themselves with the regulations at 40CFR 261 and determine which, if any of their waste streams are hazardous. In EC's opinion, the Hydrochloric Acid waste from the Etching Booth would be hazardous by characteristic (See Subpart C, §261.22). Hazardous waste is defined at §261.3. It should be determined if the regulations at §261.3(a)(2)(v) are applicable to any of BDT's waste oil.

In a PADEP inspection report of September 8, 1994, an apparent determination was made that the Frazer, PA facility was a Small Quantity Generator (SQG). In Subpart B, §260.10, a SQG is defined as a "generator who generates less than 1000 kg of hazardous waste in a calendar month. Also, DBT should review the regulations at §261.5 to determine if they meet the definition of a conditionally exempt SQG (one who generates no more than 100 kg per calendar month).

DBT should review the regulations at 40CFR 262, Subpart B, 40CFR 262, Subpart C, and 40CFR 262, Subpart D to ensure that they are in compliance with the manifest, pre-transport, and recordkeeping and reporting requirements of the regulations. The regulations at §262.34 address accumulation times which are different for SQG's than for Large Quantity Generators (LQGs).

Since DBT periodically disposes of waste oil, the regulations at 40CFR 279 should be reviewed for applicability.

6.0 SARA TITLE III

The facility is assumed to be subject to reporting under the Superfund Amendments and Reauthorization Act, Sections, 311, 312 and 313 (SARA Title III). The SARA Section 311 and 312 regulations are set-forth at 40CFR Part 370 and the SARA Section 313 regulations are set-forth at 40CFR Part 372. There are 27 full-time employees and the facility's SIC Code is 3317; therefore, the criteria of 10 or more full-time employees and having operations identified as being in SIC Codes 20 through 39 is satisfied.

A facility that meets the employee and SIC reporting criteria is required to file under Sections 311 and 312 if there is a listed hazardous chemical present at the facility in an amount equal to or greater than 10,000 pounds, or if there is an extremely hazardous substance present at the facility in an amount greater than or equal to 500 pounds (or 55 gallons) or the threshold planning quantity (TQP) for that chemical, whichever is less.

A facility that meets the employee and SIC reporting criteria is required to file under Section 313 if the facility annually manufactures or processes 25,000 pounds or greater of a listed hazardous chemical or annually otherwise uses 10,000 pounds or greater of a listed hazardous chemical.

The criteria information on the quantity of Section 313 chemicals processed and otherwise used (the facility does not manufacture any chemicals) was not readily available; however, it is assumed that, as a minimum, the facility would exceed the threshold reporting quantity for Manganese, Nickel, and Chromium.

EC could find no information relative to the facility having filed under SARA Title III, Section 311 or 313; however, there was information relative to a 1991 SARA 312 submission for Hydrofluoric Acid, Nitric Acid, and Trichloroethylene.

7.0 AIR POLLUTION CONTROL

DBT's manufacturing processes emit minimal quantities of air pollutants. The operations, which are enclosed within Building #8, include welding, induction

annealing, band saw cutting, and tube polishing. There are four (4) small parts washers (three (3) sink type and one (1) closed unit that use Safety-Kleen mineral spirits), an etching booth (muriatic acid), 55 gallon drums of oil (primarily hydraulic), a 1,450 gallon storage tank (approximately 1% emulsified oil and water), one (1) cooling tower (non-contact cooling water), and infrared space heaters. The facility operates three (3) Torit Filter Cartridge System Dust Collectors (Torit Downflow Model 2DF4) which exhaust inside the building. These dust collectors control particulate matter emissions from tube polishing. There are no steam boilers, pickling or open-air annealing operations, and no servicing of motor vehicle air conditioners.

A general review of the facility's air regulatory compliance history revealed no existing air noncompliance or enforcement issues.

Pennsylvania Plan Approval requirements are contained in Pennsylvania Code Title 25 §125 Subchapter B. Under §127.14 9(a)(8), it is stated that plan approval is not required for the construction, modification, reactivation, or installation of sources and classes of sources determined to be of minor importance by the PADEP. The audit revealed that there were no Plan Approvals for the facility. The company files should contain a record of the formal determination by the agency that plan approvals were not required; however, no such information was provided for EC's review.

The regulations at 25 PA Code §135.2 exempt certain sources from annual air emissions reporting (AIMS Report), including sources and classes of sources determined to be of minor significance by PADEP. The audit findings indicate that the facility did not receive notification by PADEP that an annual source report was required.

Air pollution episode standby plans, covered under 25 PA Code §137, are required for certain classes of sources located in designated counties (based on monitored exceedences of air criteria for SO_2, PM_{10}, CO, NO_2, and ozone), including manufacturing facilities which employ more than 20 employees in the primary and secondary metals industries. The audit did not reveal that such a plan was required for the facility (given the minimal air emissions, it is highly unlikely one would be required).

The audit revealed that the facility is clearly not a major source and is, therefore, not subject to the Title V permitting program (25 PA Code §127 Subchapter G, 40 CFR Part

70).

Due to the negligible air emissions originating from the facility, it is highly likely that the source complies with all PADEP standards for fugitive particulate matter emissions (25 PA Code §123.2), odor emissions (25PA Code §123.31), and visible emissions (25 PA Code §123.41).

Based on a review of facility operations, the audit has revealed that the facility is not subject to the following requirements:

- Prevention of Significant Deterioration (25 PA Code §127 Subchapter D and 40 CFR Part 52.21)
- New Source Review (25 PA Code §127 Subchapter E)
- Alternative Emission Reduction Limitations (25 PA Code §128)
- VOC limits for storage tanks (25 PA Code §129.57)
- New Source Performance Standards (40 CFR Part 60)
- National Emission Standards for Hazardous Air Pollutants (40 CFR Part 63)
- Compliance Assurance Monitoring (40 CFR Part 64)
- Chemical Accident Prevention Program (40 CFR Part 68)
- Protection of Stratospheric Ozone (40 CFR Part 82)

8.0 RECOMMENDATIONS & CONCLUSIONS

1 All liquid-filled electrical equipment should be considered to be "PCB Contaminated Electrical Equipment" (>50 ppm PCBs but <500 ppm PCBs) until the liquid is sampled and analyzed for PCBs.

2 The two (2) stained transformers should be checked and if found to be leaking either repaired or removed from service in accordance with the regulations at 40CFR 761.

3 Any PCB leaks or spills should be handled in accordance with the regulations at 40CFR 761.

4 If testing indicates PCBs at a concentration at or above 500 ppm, the equipment would be subject to the regulations at §761.30(a)(1)(xv) including marking as set-forth at Subpart C (§761.40 and §761.45).

5 The following asbestos regulations at 29CFR 1910.001 are applicable to BDTs operations:

- Warning signs & labels [(j)(3) & (j)(4)]
- Employee information & training [(j)(7)]
- Recordkeeping [(m)]
- Maintenance & housekeeping [(k)]

6 DMRs need to be submitted every six months for Outfall 002.

7 The PPC Plan needs to be revised and updated.

8 The facility does not need a SPCC Plan; however, a determination needs to be made relative to the partially buried former fuel oil tank. This includes ownership and responsibility.

9 DBT should contact Christiana Metals regarding disposal of the on-site drilling wastes. It is EC's recommendation that these wastes be disposed, in accordance with the applicable hazardous waste disposal regulations, as soon as practicable.

10 DBT should review the hazardous waste regulations at 40CFR 260, Subpart B.

11 DBT should review the waste oil regulations at 40CFR 261.3(a)(2)(v), Subpart C.

12 DBT should review the hazardous waste regulations at 40CFR 261.5 to determine if they meet the definition of a "Conditionally Exempt Small Quantity Generator" (one who generates no more than 100 kg per month).

13 It is EC's opinion that the DBT facility is required to file under Sections 311, 312, and 313 of SARA Title III.

14 EC recommends that DBT meet with the property owner to establish a policy to ensure compliance with the PCB, asbestos, underground storage tank (UST), and hazardous waste regulations.

APPENDIX A
Excerpts from PCB Regulations at 40CFR 761

APPENDIX B

Excerpts from Asbestos Regulations at 29CFR 1910.1001

APPENDIX C

Excerpts from Oil Spill Regulations at 40CFR 110 & 40CFR 112

APPENDIX D

Excerpts from Hazardous Waste Regulations at 40CFR 260

APPENDIX E

Excerpts from Hazardous Waste Regulations at 40CFR 261

APPENDIX F

Excerpts from Hazardous Waste Regulations at 40CFR 262

APPENDIX G

Excerpts from Waste Oil Regulations at 40CFR 279