

01742412

*Necessity for
permit due to BLD
2 years or so.
Agreement. status.*

A CONCEPTUAL PROPOSAL ON

PLANT IMPROVEMENTS AND POLLUTION INCIDENT PREVENTION

BY

PAUL GYRSTING,
PRESIDENT

BISHOP TUBE CO.

A DIVISION OF
CHRISTIANA METALS CORP.

01742413

On or before May 1, 1975, Bishop Tube Company proposes:

I. A Reduction in Open Hearth Annealing

The new bright annealing furnace ordered on May 2, 1974 is expected to be on line. This new furnace will have an immediate impact on reducing, by at least two-thirds, the amount of material which is annealed in our open hearth furnace. The open hearth furnace produces tubing with surface scale and oxidation products which must be removed in a chemically active solution prior to cold drawing.

II. A Closed Circuit Acid System

The new bright annealing furnace will reduce the amount of tubing requiring a pickling step in its manufacturing process. This reduced activity will allow Bishop Tube to change the way the pickling facilities have been operated. The cascade water rinse will be eliminated and replaced by a series of stagnant rinse tanks, which will be emptied into our used acid storage tank for disposal by Gray Brothers, Inc., an approved disposal service. The floor drain will either be sealed off or connected to its own holding tank which will have its contents emptied by Gray Brothers, Inc. The above two steps (the elimination of a cascade rinse and the sealing off or re-routing of the area floor drain) will keep any diluted acid getting into the ground.

III. A Re-Cycled Cooling Water System

The cooling water requirements of the new furnace, and all of the other pieces of equipment in Plant 8 which use cooling water will be connected to a new cooling tower system. This system which is currently under design will collect all the warm water discharges, cycle them through the tower and return them to the cool water inputs where required. The system will be charged with Springfield water and will probably have a water conditioning station in the Springfield water make-up line. At the present time an exact bleed off rate for the cooling water system is not known; many operation factors will have to be considered before the exact value can be determined. A calculated value of between

*Calgon
softening
only*

*No chemical
additives
planned*

*Cleaning on annual
basis - contractor*

4 and 8 G.P.M. has been arrived at using theoretical values. This Springfield bleed off water can be routed to our septic system.

IV. Human Waste System

01742414

The human waste system is emptied and cleaned a minimum of once a year by Gray Brothers, Inc. A chemical by Medallion Chemical Co. is added by our plant maintenance department to our system two times a week. This procedure has proven satisfactory in the past.

V. East Whiteland Township Sewer System

A portion of our property was deeded as a right of way to East Whiteland Township in July 1972, for their new sewer system. As soon as it is available, Bishop Tube Co. will make a permanent hook up to that system thereby eliminating our dependence on a septic system.

VI. Grounds Clean-Up

As an ongoing project, plans are under way to provide centralized concrete pads at various places around the buildings for oil and lubricant drum storage. Additional concrete work will be performed when needed. The above plans are a part of an overall plant beautification program whose accomplishments will be reported in our monthly Pollution Incident Prevention reports beginning December 1, 1974.

Report due November 1, 1974

Don Manigault
sampled of discharge

chromium
direct cooling with open
hearth annealing → all
other is non-contact
cooling

"Digest"
Compound

Bishop Tube Co.

ROUTE 30 AND MALIN ROAD
FRAZER, PENNSYLVANIA 19355

01742434

PHONE: (215) 647-3450 TWX 510-668-5428 TELEX 83-4511

November 1, 1974

NOV 6 1974

Mr. Richard Hinkle, P.E.
Facilities Section

Commonwealth of Pennsylvania
Department of Environmental Resources
Norristown Regional Office
1875 New Hope Street
Norristown, Pa. 19401

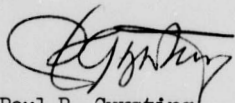
WATER
NORRISTOWN REGIONAL OFFICE

Dear Mr. Hinkle:

Per your request at our meeting of September 24, 1974, we are
submitting herewith our Plant Improvements and Pollution Incident
and Prevention Reports dated November 1, 1974.

Sincerely,

BISHOP TUBE COMPANY


Paul P. Gyrsting
President

All discharges stop by May 1st.

PPG/dk

Steve P has agreement - must amend agreement since no discharge of BTD to septic system noted?

→ BTD chemical additives + quality to septic system + chemical cleaning periodically

→ Is Gray Brothers O.K. for acid wastes? No.

Softening BTD or rinse for grinding tower makeup.

No permit necessary if agreement states well

~~He has to have permit~~

~~Boiler BTD~~ chemical additives to septic system.

01742425

NOV 6 1974

HISTORICAL RECORDS OFFICE

PLANT IMPROVEMENTS

BY

PAUL GYRSTING,
PRESIDENT

BISHOP TUBE COMPANY

A DIVISION OF
CHRISTIANA METALS CORP.

NOVEMBER 1, 1974

On or before May 1, 1975, Bishop Tube Company proposes:

I. A Reduction in Open Hearth Annealing

The new bright annealing furnace ordered on May 2, 1974 is expected to be on line. This new furnace will have an immediate impact on reducing, by at least two-thirds, the amount of material which is annealed in our open hearth furnace. The open hearth furnace produces tubing with surface scale and oxidation products which must be removed in a chemically active solution prior to cold drawing.

II. A Closed Circuit Acid System

The new bright annealing furnace will reduce the amount of tubing requiring a pickling step in its manufacturing process. This reduced activity will allow Bishop Tube to change the way the pickling facilities have been operated. The cascade water rinse will be eliminated and replaced by a series of stagnant rinse tanks, which will be emptied into our used acid storage tank for disposal by Gray Brothers, Inc., an approved disposal service. The floor drain will either be sealed off or connected to its own holding tank which will have its contents emptied by Gray Brothers, Inc. The above two steps (the elimination of a cascade rinse and the sealing off or re-routing of the area floor drain) will keep any diluted acid getting into the ground. → N/O

III. A Re-Cycled Cooling Water System

The cooling water requirements of the new furnace, and all of the other pieces of equipment in Plant 8 which use cooling water will be connected to a new cooling tower system. This system which is currently under design will collect all the warm water discharges, cycle them through the tower and return them to the cool water inputs where required. The system will be charged with Springfield water and will probably have a water conditioning station in the Springfield water make-up line. At the present time an exact bleed off rate for the cooling water system is not known, many operation factors will have to be considered before the exact value can be determined. A calculated value of between

EFFORT TO PREVENT
LOSS CONNECTION

4 and 8 G.P.M. has been arrived at using theoretical values. This Springfield bleed off water can be routed to our septic system.

IV. Human Waste System

The human waste system is emptied and cleaned a minimum of once a year by Gray Brothers, Inc. "Digest-TD", a chemical made by Medallion Chemical Co. is added by our plant maintenance department to our system weekly. This procedure has proven satisfactory in the past.

V. East Whiteland Township Sewer System

O.K.

A portion of our property was deeded as a right of way to East Whiteland Township in July 1972, for their new sewer system. As soon as it is available, Bishop Tube Co. will make a permanent hook up to that system thereby eliminating our dependence on a septic system.

Sworn to and subscribed before me
this 15th day of Nov., 1974

Harry Eckman

HARRY ECKMAN
Notary Public, East Whiteland Twp., Chester Co.
My Commission Expires March 27, 1978

P.I.P.P. CHECKLIST

01742428

Use this checklist in place of the written summary of the PIPP. Place before each item on the list one of the following letters:

Y - Means the Plan provides adequately for prevention of pollution at the point mentioned.
N - Means the Plan does not provide adequately for prevention at the point mentioned.
N.A. - Means not applicable.

Section 44.

The Plan should consider the consequences of and provide for the prevention of accidental discharges that might occur in connection with the following:

- ☒ Y Storage of raw materials, products and fuels
- ☒ ~~N.A.~~ Storage of intermediate materials
- ☒ ~~N.A.~~ Storage of finished materials
- ☒ Y Location of floor drains
- ☒ Y Need for curbing
- ☒ ~~N.A.~~ Valving of outside dikes
- ☒ ~~N.A.~~ Procedure for operating valves
- ☒ ~~N.A.~~ Danger from flooding
- ☒ ~~N.A.~~ Inspection of tanks and curbs
- ☒ ~~N.A.~~ Monitoring contents of underground tanks
- ☒ Y Are diked areas impermeable? Do they provide adequate volume?
- ☒ Y Transportation of raw materials
- ☒ ~~N.A.~~ Transportation of intermediate materials
- ☒ ~~N.A.~~ Transportation of finished materials
- ☒ ~~N.A.~~ Location of drains and streams along transport route
- ☒ ~~N.A.~~ Monitoring of underground pipelines
- ☒ ~~N.A.~~ Processing of materials
- ☒ Y Floor drains?
- ☒ Y Routine maintenance of pipes and tanks
- ☒ ~~N.A.~~ Availability of clean up materials and equipment
- ☒ Y Effects of ruptures or leaks
- ☒ Y Cross connections? Does or has company checked for them?

44.2

- ☒ Y Effects of breakdown of equipment
- ☒ Y Availability of critical spare parts
- ☒ Y Effects of shutdown
- ☒ Y Maintenance and inspection of equipment
- ☒ Y Training of personnel for pollution prevention and control
- ☒ Y Chain of communication within the company
- ☒ Y List of contacts with outside agency and downstream water users in the event of a spill.
- ☒ Y Does company know that Department must be notified

45 External Factors

- ☒ Effects of power failure
- ☒ Effects of flooding
- ☒ Effects of strikes
- ☒ Effects of vandals

46 Past Incidents

- ☒ Have all past incidents and near misses been reviewed?
- ☒ Has corrective action been implemented
- ☒ Check files on company
- ☒ If a new plant, has the history of a similar type plant been studied

48 Clean up Services

- ☒ Have arrangements been made to obtain outside assistance if needed.
- ☒ Is list of outside assistance provided.

Serious deficiencies in the PIPP will necessitate a revision letter. Minor corrections may be documented in the inspection report made during the field review, and in the "Internal Review".

If the PIPP is adequate, prepare an internal review. Review will be for the Pollution Incident Prevention Plan, and will say:

This PIPP has been reviewed and found to provide adequately for prevention of potential pollution (with the following additions and/or revision, insert if needed, along with statements of revisions). Accordingly, it is recommended that it be (a) made a part of Application # _____
(b) made a part of Permit # _____
(c) accepted

*I assure that Don was satisfied
with all except disposal.*

01742430

sw dis in front of bldg -

chloroethane tank - spill
storage pads - curled?

01742431

NOV 6 1974

NORRISTOWN POLICE

POLLUTION INCIDENT AND PREVENTION REPORT

BY

PAUL GYRSTING,
PRESIDENT

BISHOP TUBE COMPANY

A DIVISION OF
CHRISTINA METALS CORP.

NOVEMBER 1, 1974

I. Past History

The holding tank located behind Plant 8 is used to receive rinse cooling water from our pickling facilities. The water is pumped to our septic system. This holding tank has overflowed due to heavy rains and a defective pump.

II. Corrections

In order to prevent the holding tank from overflowing again the pump house is being re-built to keep rain water out and the original pump is being replaced with a new ^{OK} highly efficient pump.

III. Areas for Caution

- A) Holding tank water overflow -
- B) Leaks from acid storage tanks ^{OK}
- C) Oil drum storage leaks ^{OK}
- D) In Process acid leaks ^{OK}
- E) Waste solids handling

IV. Possible Incidents

All items mentioned under Section III are potential pollution incidents. Serious efforts are under way to reduce the extensive use of costly acids in our manufacturing processes.

V. Preventive Programs

A) Holding tank for rinse and cooling water as outlined in Section II.
Concrete work and the installation of a new pump will prevent the overflow problem.

^{OK} B) Leaks from acid storage tanks
Dikes will be constructed around these tanks which will be capable of retaining the tank contents if an accident should occur. ^{CONSTRUCTION - DRAINAGE}

^{OK} C) Oil drum leaks ^D
Concrete pads and concrete storage areas will be provided for drum placements.

D) In Process acid leaks

Under Section II in our Plant Improvement Report, we will be restricting the movements of all the acids. Any leaks or spills will find their way to a holding tank for proper disposition.

WHERE?

E) Waste solids handling

On an infrequent basis, the acid tanks are cleaned of solids. These dried materials will be stored indoors until they can be carried off by our disposal service.

Problem with Tanks + Containers
55.942 drums
CONTAINER

VI.

Implementation Schedule

Section III

A) Pump House

Concrete Work	11/11/74	begin	Done
	12/2/74	complete	
Pump Installation	12/9/74	begin	
	1/1/75	complete	2 way

B) Dike Network Construction

Layout	11/29/74	
Design Done	12/16/74	complete
Fabrication	3/3/75	begin
	5/1/75	complete

C) Pad Fabrication

Layout	11/19/74	
Fabrication Done	12/9/74	(weather permitting)

D) In Process Leaks

Layout	2/17/75	
Design complete	3/3/75	
Fabrication	4/1/75	begin
	5/1/75	complete

E) Solids Handling

Currently being done when necessary.

Sworn to and subscribed before me
this 11th day of March, 1974

Harry Eckman
HARRY ECKMAN

Notary Public, East Windsor and Town, Chester Co.
My Commission Expires March 27, 1978

Bishop Tube Co.

01742437
ROUTE 30 AND MALIN ROAD
FRAZER, PENNSYLVANIA 19355

PHONE: (215) 647-3450 TWX 510-668-5428 TELEX 83-4511

November 27, 1974

Mr. Donald Mangialardi
Environmental Protection Technician II

Commonwealth of Pennsylvania
Department of Environmental Resources
Norristown Regional Office
1875 New Hope Street
Norristown, Pa. 19401

RECEIVED
NOV 29 1974
L. J. ...
WATER ...
NORRISTOWN

Reference: Pollution Incident and Prevention Report (P.I.P.) 11/1/74
Plant Improvements Report- 11/1/74.

Subject: Monthly Update

Dear Mr. Mangialardi:

We are pleased to report our progress on our Plant Improvements and Pollution Incident and Prevention Programs.

The following paragraph refers to our P.I.P. report, Section IV--
We are expecting to have the pump house restoration complete in early December(A). We have had some preliminary conversations regarding our approach to the dike construction(B). We expect to have our layouts complete on schedule for the oil storage pads(C). The careful and conservative handling of our liquid and solid acids is a topic we are trying to educate our employees on daily, through their supervisors. These topics are also being discussed in our engineering meetings (D & E).

Through bi-weekly contact with our furnace supplier we are assured that the new bright annealing furnace will ship on time. Much work is under way by our various departments. They are working to assure that the speedy realization of benefits from this additional bright annealing furnace will be available as soon as possible. The area where this new furnace will go is being cleared now. The area where components of our recycled cooling water system will go is also being cleared. Much detail work is being done on all phases of this combined installation.

In an effort to install our new cooling tower in its place as soon as possible we have enlisted the services of a helicopter and crew.

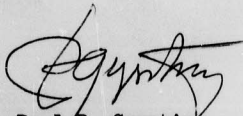
01742438

They will lower the cooling tower through a hole in our roof in a matter of hours to expedite this installation. This procedure is costly, but we feel it is money well spent to hasten the overall program.

If you have any further questions on any aspect of this program, please contact our Senior Project Engineer-Mr. Robert Holt.

Sincerely,

BISHOP TUBE COMPANY

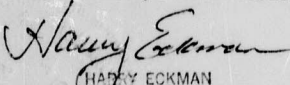


Paul P. Gyrsting
President

PPG/dk

Notary

Sworn to and subscribed before me
this 27 day of Nov, 1977



HARRY ECKMAN

Notary Public, East Whiteland Twp., Chester Co.

My Commission Expires March 27, 1978

Date 12/23/74

Subject: Industrial Waste Application

PRELIM

01742441

BISHOP TUBE, INC
E. WHITELAND TWP
CHESTER

To:

~~Watt Stanley~~
Chief - Operations

Richard L. Binkle
Chief - Facilities

From:

Sanitary Engineer

Attached is a Pollution Incident Prevention Program (PIPP) for the subject Company. ~~Since the subject permit application is pending,~~ Please arrange to have the PIPP given a prompt review and any comments returned to me, through the Section Chief, within ten (10) working days so we can in turn reply to the affected parties.

If you would like to see any further documents ~~(plans, etc.)~~, please see me.

Don M. handled this case previously.

Is Gray Brothers, Inc an acceptable disposal agency for sewage wastes and for used acid rinses? - Permit From C.C.H.D. TO HAUL BUT NOT TO DUMP

If Gray Brothers will not disclose disposal site, PIPP is unacceptable. ^{Approved} Disposal site must be supplied before PIPP will be approved. JEP 4/10/75

Bishop Tube Co.

ROUTE 30 AND MALIN ROAD
FRAZER, PENNSYLVANIA 19355

01742442

PHONE: (215) 647-3450 TWX 510-668-5428 TELEX 83-4511

December 30, 1974

Mr. Donald Mangialardi
Environmental Protection Technician II
Commonwealth of Pennsylvania
Department of Environmental Resources
Norristown Regional Office
1375 New Hope Street
Norristown, Pa. 19401

RECEIVED
JAN 2 1975
ENVIRONMENTAL PROTECTION
WATER POLLUTION CONTROL
NORRISTOWN REGIONAL OFFICE

Reference: Pollution Incident and Prevention Report (P.I.P.) 11/1/74
Plant Improvements Report - 11/1/74

Subject: Monthly Update

Dear Mr. Mangialardi:

We are pleased to report our progress on our Plant Improvements and Pollution Incident and Prevention Programs.

The following paragraph refers to our P.I.P. report, Section IV - We are expecting to have the pump installed by the end of January. The restoration to the pump house is complete less the painting (A). We have begun to make layouts of the area and terrain where the dikes will have to be installed (B). The layout work for the oil storage pads are nearing completion (C). The education process on handling dangerous materials is ongoing with an effort through our first line supervisors (D&E). S F E

OK Supplier problems have troubled our furnace manufacturer. Delivery of the furnace is expected on January 15 and January 29, 1975. The foundation for the new furnace is being prepared now and an electrical contractor has also been selected.

The helicopter and crew were used to install our cooling tower on December 21, 1974. The installation went remarkably smooth. A contractor has been selected to do the piping work on the cooling tower, this work will begin shortly. The duct work on the cooling tower is also under way. Every

01742443

Mr. Donald Mangialardi

-2-

December 30, 1974

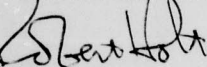
effort is being made to move all these projects along as quickly as possible.

Enclosed is our third check in the amount of \$1,000.00 as our contribution to your Pennsylvania Clean Water Fund.

If you have any further questions on any aspect of this program, please contact our Senior Project Engineer, Mr. Robert Holt.

Sincerely,

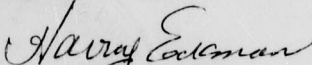
BISHOP TUBE COMPANY



Robert Holt for Paul P. Gyrsting
Senior Project Engineer

Enc.

Sworn to and subscribed before me
this ~~30th~~ day of ~~Dec.~~ 1974



HARRY ECKMAN

Notary Public, East Whiteland Twp., Chester Co.
My Commission Expires March 27, 1978

Don Mangialardi

Bishop Tube Co.

ROUTE 30 AND MALIN ROAD
FRAZER, PENNSYLVANIA 19355

01742443A



PHONE: (215) 647-3450 TWX 510-668-5428 TELEX 83-4511

No check

January 31, 1975

FEB 3 1975

Mr. Donald Mangialardi
Environmental Protection Technician II
Commonwealth of Pennsylvania
Department of Environmental Resources
Norristown Regional Office
1875 New Hope Street
Norristown, Pa. 19401

Reference: Pollution and Prevention Report (P.I.P.) 11/1/74
Plant Improvements Report 11/1/74

Subject: Monthly Update

Dear Mr. Mangialardi:

We are pleased to report our progress on our Plant Improvements and Pollution Incident and Prevention Programs.

The following paragraph refers to our P.I.P. report, Section IV- The new pump is installed. The wiring and piping will be complete mid February (A). The dike design is out for quote (B). The oil storage pad designs are also out for quote (C). The education process on handling dangerous materials is ongoing, with an effort through our first line supervisors (D&E).

As reported last month, the furnace was shipped on its revised schedule. A Bickley Furnace Company representative is on site directing the efforts of a crew on the assembly of the furnace. An electrical contractor is on site working on the furnace also. Another contractor is also on site working on our cooling tower piping and pumping system.

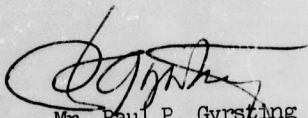
Enclosed is our 4th check in the amount of \$1,000.00 as our contribution to your Pennsylvania Clean Water Fund.

01742444

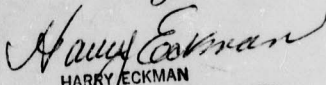
If you have any further questions on any aspect of this program, please
contact our Senior Project Engineer, Mr. Robert Holt.

Sincerely,

BISHOP TUBE COMPANY


Mr. Paul P. Gyrstling
President

Sworn to and subscribed before me
this ~~31st~~ day of *Jan.* 1975


HARRY ECKMAN
Notary Public, East Whiteland Twp., Chester Co.
My Commission Expires March 27, 1978

Don M.
Check with
Hsec. 9-18h5

01743445

24
E. Whitehead T
Chestn County

Bishop Tube Co.

ROUTE 30 AND MALIN ROAD
FRAZER, PENNSYLVANIA 19355



PHONE: (215) 647-3450 TWX 510-668-5428 TELEX 83-4511

February 27, 1975

RECEIVED
5FF
FEB 27 1975

Mr. Donald Mangialardi
Environmental Protection Technician II
Commonwealth of Pennsylvania
Department of Environmental Resources
Norristown Regional Office
1875 New Hope Street
Norristown, Pa. 19401

NORRISTOWN REGIONAL OFFICE

Reference: Pollution and Prevention Report (P.I.P.) 11/1/74
Plant Improvements Report 11/1/74.

Subject: Monthly Update

Dear Mr. Mangialardi:

We are pleased to report our progress on our Plant Improvements and Pollution Incident and Prevention Programs.

The following paragraph refers to our P.I.P. Report, Section IV-as reported the new pump is installed. The completion of the wiring is waiting for the liquid level controls. The delivery of these controls has been delayed twice. We have been assured that the controls were shipped 2/25/75. The installation of these controls will require one day and will be done upon receipt of the equipment (A). The dike designs are still out for quote, the initial quotes were so high that we have called more people in to get additional ideas and more quotes (B). The oil storage pad designs like the dike designs are out for additional quotes (C). The personnel instruction efforts are still continuing (D&E)

The erection of the furnace is still progressing satisfactorily, much electrical work still remains and some engineering debugging will be done prior to our initial test run. The closed circuit cooling water system is proceeding in parallel to the furnace erection.

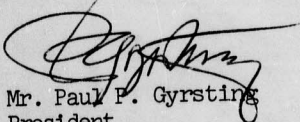
01742446

Enclosed is our 5th check in the amount of \$1,000.00 as our contribution to your Pennsylvania Clean Water Fund.

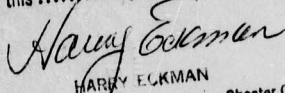
If you have any further questions on any aspect of this program, please contact our Senior Project Engineer, Mr. Robert Holt.

Sincerely,

BISHOP TUBE COMPANY


Mr. Paul P. Gyrsting
President

Sworn to and subscribed before me -
this 26th day of Feb. 1978


HARRY ECKMAN
Notary Public, East Whiteland Twp., Chester Co.
My Commission Expires March 27, 1978

Wait
Payment sent
To Hsac - 4 P.
4/16/75
skc

Bishop Tube Co.

ROUTE 30 AND MALIN ROAD
FRAZER, PENNSYLVANIA 19355

01742449



PHONE: (215) 647-3450 TWX 510-668-5428 TELEX 83-4511

April 2, 1975

Mr. Donald Mangialardi
Environmental Protection Technician II
Commonwealth of Pennsylvania
Department of Environmental Resources
Norristown Regional Office
1875 New Hope Street
Norristown, Pa. 19401

RECEIVED
APR 3 1975
WATER CONTROL
NORRISTOWN REGIONAL OFFICE

Reference: Pollution and Prevention Report (P.I.P.) 11/1/74
Plant Improvements Report 11/1/74

Subject: Monthly Update

Dear Mr. Mangialardi:

We are pleased to report our progress on our Plant Improvements and Pollution Incident and Prevention Programs.

The following paragraph refers to our P.I.P. Report, Section IV-
The new pump and its controls are now working (A). The dike design has been settled, and new quotes were received. The contract should be awarded by 4/8/75 with work to begin immediately (B). The oil storage pad designs were also settled and new quotes were received. The contract should be awarded by 4/8/75 with work to begin immediately (C). The personnel instruction efforts are still continuing (D&E).

The new furnace is entering its check-out period. Initial results of the test material that was annealed are most encouraging. Our tentative plans call for the shut down of the open hearth furnace towards the end of April. The closed circuit cooling water system is complete. At this point it is operable but not by automatic controls, due to some supplier problems. It is however able to achieve our objective of reusing our cooling water.

4/10
Problem with seal on cooling section of furnace - may delay shutting down of open hearth. Can operate new furnace at 1/3 capacity. Furnace can be restored in 3 weeks to a month.
Open hearth at half of previous capacity
Cooling Tower operating as closed system NOW.-
Acid storage tanks (3) - need to install basin around tanks. Dependence on acid on open hearth. Will reduce need in future.

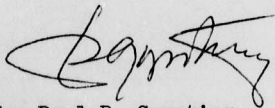
01742450

Enclosed is our 6th check in the amount of \$1,000.00 as our contribution to your Pennsylvania Clean Water Fund.

If you have any further questions on any aspect of this program, please contact our Senior Project Engineer, Mr. Robert Holt.

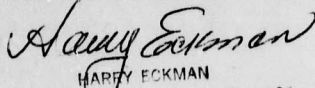
Sincerely,

BISHOP TUBE COMPANY



Mr. Paul P. Gyrsting
President

Sworn to and subscribed before me
this 2nd day of April, 1975



HARRY ECKMAN
Notary Public, East Whiteland Twp., Chester Co.
My Commission Expires March 27, 1978

Would as temporary device - old acid resistant
brick + ~~brick~~ ties & earthen embankments.

Will address in next letter → report. & beginning of May.
and expand upon in June Report. (will include ^{time table})

Company doesn't know where Gray Brothers
takes material. Gray Brothers assured Company
they are handling properly.

Electrostatic Water Treatment or Chemical
Treatment system will likely be provided
to control scaling, etc. - closed system

Any discharge to septic system.

Concrete pads to be installed (4 areas) - all
drainage to center of pad - evaporation.

Bishop Tube Co.

ROUTE 30 AND MALIN ROAD
FRAZER, PENNSYLVANIA 19355

01743451

PHONE: (215) 647-3450 TWX 510-668-5428 TELEX 83-4511

April 30, 1975

MAY 5 1975

Mr. Donald Mangialardi
Environmental Protection Technician II
Commonwealth of Pennsylvania
Department of Environmental Resources
Norristown Regional Office
1875 New Hope Street
Norristown, Pa. 19401

WATER
NORRISTOWN REGIONAL OFFICE

Reference: Pollution and Prevention Report (P.I.P.) 11/1/74
Plant Improvements Report 11/1/74.

Subject: Monthly Update

Dear Mr. Mangialardi:

We are pleased to report our progress on our Plant Improvements and Pollution Incident and Prevention Programs.

The following paragraph refers to our P.I.P. Report, Section IV-
A) Complete. B) The revised dike network as discussed between Robert Holt and Richard Hinkle will be complete by 5/16/75. C) The closed circuit system is under construction. The requirement for special materials and the uncertainty of the physical strength of various joints and seals continues to make the end date unpredictable. E) Complete.

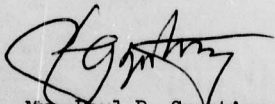
The new furnace is running but some design problems have kept it from reaching its capacity. We have nevertheless shut down the open hearth furnace as anticipated. As of May 1, 1975 we are no longer discharging acid contaminated rinse waters into our septic tank system. Since pickling has been considerably reduced due to the shut down of the open hearth furnace, we have greatly reduced the amount of acid rinse water to be carried away.

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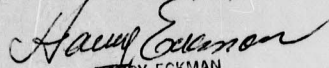
If you have any further questions on any aspect of this program, please contact our Senior Project Engineer, Mr. Robert Holt.

Sincerely,

BISHOP TUBE COMPANY


Mr. Paul P. Gyrsting
President

Sworn to and subscribed before me
this 1st day of MAY, 1975


HARRY ECKMAN
Notary Public, East Whiteland Twp., Chester Co.
My Commission Expires March 27, 1978

Bishop Tube Co.

ROUTE 30 AND MALIN ROAD
FRAZER, PENNSYLVANIA 19355

PHONE: (215) 647-3450 TWX 510-668-5428 TELEX 83-4511

01742453

June 2, 1975

Mr. Donald Mangialardi
Environmental Protection Technician II
Commonwealth of Pennsylvania
Department of Environmental Resources
Norristown Regional Office
1875 New Hope Street
Norristown, Pa. 19401

RECEIVED
JUN 3 1975

WATER QUALITY
NORRISTOWN REGIONAL OFFICE

Reference: Pollution and Prevention Report (P.I.P.) 11/1/74
Plant Improvements Report 11/1/74.

Subject: Monthly Update

Dear Mr. Mangialardi:

We are pleased to report our progress on our Plant Improvements and Pollution Incident and Prevention Programs.

The following paragraph refers to our P.I.P. Report, Section IV-
A) Complete. B) Complete (Ref. our report 4/30/75) C) Complete.
D) Complete. E) Complete.

The new furnace is running more efficiently week by week. The impact of our new furnace is having a positive effect on our pickling requirements. We are also reducing the number of our pickling tanks. We are continuing to gather data on these operations.

If you have any further questions on any aspect of this program, please contact our Senior Project Engineer, Mr. Robert Holt

Sincerely,

BISHOP TUBE COMPANY

Paul P. Gynsting
Mr. Paul P. Gynsting
President

Sworn to and subscribed before me
this 2nd day of June, 1975

Harry Eckman
HARRY ECKMAN
Notary Public, East Whiteland Twp., Chester Co.
My Commission Expires March 27, 1978

COMMONWEALTH OF PENNSYLVANIA
WATER QUALITY MANAGEMENT
1875 New Hope Street
Norristown, Pa. 19401

June 27, 1975

01742451

SUBJECT: Industrial Waste
Bishop Tube Company
East Whiteland Township, Chester County

TO: Walter E. Stanley, Jr., Chief
Operations Section

FROM: Richard L. Hinkle, Chief
Facilities Section

With reference to the above case, I was recently contacted by Mr. Bob Holt of Bishop Tube Company regarding the status of compliance at his plant near Malvern.

According to the monthly report dated June 2, 1975, apparently all of the items have been completed involving pollution abatement at the Company's plant. I, therefore, indicated to Mr. Holt that it would not be necessary to continue to submit the monthly report to this office.

The Company did submit a PIPP to us for review; I understand that an evaluation was done by Don Mangialardi, and a number of points were raised which remain to be resolved. One point that sticks in my mind was the issue of proper disposal for waste acids, which are hauled by Grey Brothers from the plant site.

With respect to the Company's discharges, I understand that the recirculation system for cooling water is in service; therefore, there should be no discharge at the Company's plant with the exception of sewage and blowdown from the cooling tower into the existing subsurface disposal system. Although the system is likely not adequate for long term use, the Company has agreed to connect to the East Whiteland Township Authority's sewerage system when it becomes available within a couple of years or so.

Due to the ground water problem, which has been created as a result of disposal of waste acids in the subsurface disposal system, I would recommend that consideration be given to requiring quarterly or semi-annual reports from the Company relative to ground water quality to see if the underground problem is clearing up with time. The Company has existing wells on its property and also a fire pond, which is fed by wells, therefore, monitoring should be no problem.

In summary, I recommend that the PIPP evaluation be completed and a formal approval granted if such can be done. In addition, we recommend that a field investigation be conducted to confirm that the discharges have, indeed, been eliminated and that the PIPP measures proposed have been implemented.

Should you have any questions, please contact me.

RLH:jt

cc: Compliance & Administration Section

Bishop Tube Co.

01742455
ROUTE 30 AND MALIN ROAD
FRAZER, PENNSYLVANIA 19355

PHONE: (215) 647-3450 TWX 510-668-5428 TELEX 83-4511

March 5, 1976

RECEIVED
MAR 7 1976
ENVIRONMENTAL RESOURCES
WATER QUALITY MANAGEMENT
NORRISTOWN REGIONAL OFFICE

Department of Environmental Resources
Water Quality Management
1875 New Hope Street
Norristown, Pa. 19401

Attention: Mr. Stephen Pedersen

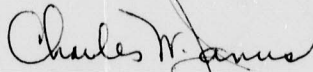
Dear Mr. Pedersen:

As per your phone request and our conversation of March 5, 1976 concerning the misplacing of reports. I am sending you copies of letters written to your office.

1. November 1, 1974 - to Mr. Hinkle - Subject: Plant Improvements and Pollution Incident and Prevention Report
2. November 27, 1974 - to Mr. Mangialardi - Subject: Monthly update
3. December 30, 1974 - to Mr. Mangialardi - Subject: Monthly update
4. January 31, 1975 - to Mr. Mangialardi - Subject: Monthly update
5. February 27, 1975 - to Mr. Mangialardi - Subject: Monthly update
6. April 2, 1975 - to Mr. Mangialardi - Subject: Monthly update

I hope that these will replace the misplaced letters, and if you need any further assistance please do not hesitate to request same.

Very truly yours,


Charles W. Janus
Project Engineer

01742456

1875 New Hope Street
Norristown, Pa. 19401
215-631-2405

March 12, 1976

Mr. Charles W. Janus, Project Engineer
Bishop Tube Company
Route 30 & Malin Road
Frazer, Pa. 19355

RE: Industrial Wastes - Pollution Incident Prevention Plan
Bishop Tube Company
East Whiteland Township, Chester County

Dear Mr. Janus:

This will confirm receipt of your letter of March 5, 1976 along with copies of several letters and reports previously submitted to this office. This material was sent to me at my request to replace material which has been misplaced.

This material has been reviewed along with the results of the inspection, which I conducted on February 25, 1976. Following is a list of items and questions which must be dealt with before Bishop Tube Company can be considered to be in compliance:

The Pollution Incident Prevention Plan and various reports which were submitted, indicate that leaks or spills from the process acid tanks would find their way to a holding tank for proper disposition. The inspection which I conducted revealed that leaks and splashes from the acid tanks are not finding their way to the holding tank, but rather are going to the pump house and being pumped up to the septic system. This must be changed so that any leaks, splashes or drippings from the rinse tanks and the acid tanks find their way into the holding tanks to be hauled away.

In reviewing the information provided, I understood that there were to be no cooling water discharges once the cooling tower for the furnaces was installed. During the inspection which I made, I observed a cooling water discharge flowing from the basement of plant 8. I was informed that this was cooling water from the compressors. Would you please clarify the status of this cooling water with respect to the concept that all cooling water was to be recycled. What is the ultimate disposition of these cooling waters? Also in the same area, a pool of oil beneath the porch at plant 8 was observed. Personnel of Bishop Tube Company were to investigate and determine a source of this oil. What is the source of this oil, and what steps were taken to prevent any further discharge of oil?

Page 2

Mr. Charles W. Janus

March 12, 1976

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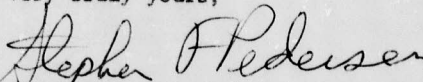
Waste acid and waste acid rinses are stored in a holding tank. When the holding tank is full, the waste discharges through a pipeline into a tank truck and are hauled away. The location of the discharge line is hazardous, particularly when the pump station to the septic tank is phased out and sewage discharged to the East Whiteland Sewage System. A leak or malfunction of the valves could easily cause a serious pollution incident. Some method of guarding against an incident resulting from this must be proposed and implemented. In addition, please inform this office of the ultimate destination of the acid waste which are hauled out.

Because acids and industrial waste have been discharged to the ground water on the Bishop Tube property for a long period of time, the ground water must be monitored for the presence of various contaminants. Please submit to this office a map or plan of the Bishop Tube property with the location of all wells used by the Company for their fire pond. A periodic sampling program should be set up for various contaminants (to be determined at a future time), and the results of these samplings should be submitted to this office.

These various closed systems which have been installed for cooling water often time requires the addition of water conditioning agents to prevent buildups of scum or minerals in the system. Please submit to this office a list of all additives which are used and which may show up in any blowdowns from the system. The information should include toxic limits for these additives.

Please submit in writing the additional information requested above. Should you have any questions on any of these items, please feel free to contact me.

Very truly yours,



Stephen F. Pedersen

Environmental Protection Specialist

SFP:jt

cc: Richard Hinkle ✓

Bishop Tube Co.

01742458

ROUTE 30 AND MALIN ROAD
FRAZER, PENNSYLVANIA 19355

APR 9 1976

PHONE: (215) 647-3450 TWX 510-668-5428 TELEX 83-4511

April 7, 1976

Department of Environmental Resources
Water Quality Management
1875 New Hope Street
Norristown, Pa. 19401

Attention: Mr. Stephen Pederson

Dear Mr. Pederson:

This will confirm our meeting of March 19, 1976, the items we discussed, plus what will be done.

The company feels we should apply for a permit to use discharge 001 as a discharge for the non-contact cooling water used to cool the aftercoolers on our air compressors. Please send me all necessary forms and information. At a later date we may use the sewer for discharge, but this will only be used as insurance.

As for the oil under the porch area, that came from the air compressors. This oil has been cleaned up, and any drippings are now piped into a tank which will be monitored.


I did talk to Gray Brothers, and I was referred to the letter their attorney wrote to Mr. Holt dated October 11, 1974. A copy is attached.

One change is being made in Plant 8 at the Open Hearth Annealing Furnace, which had to be used for increased production. Its cooling water is being filtered, then recycled through the cooling tower. This change will be completed within the next (60) sixty days. ND Sis

Somehow I was led to believe that a permit was applied for when Gilbert Associates sent in their plans and reports. Please help me to correct my thinking and tell me what did happen, for I do not have true records of this.

Should you have any questions or need any additional information, please do not hesitate to contact me.

Very truly yours,


Charles W. Janus
Project Engineer

COMMONWEALTH OF PENNSYLVANIA



01742461

DEPARTMENT OF ENVIRONMENTAL RESOURCES

1875 New Hope Street
Norristown, Pennsylvania 19401
215 631-2409

May 18, 1976

Mr. Charles W. Janus, Project Engineer
Bishop Tube Company
Route 30 and Malin Road
Frazer, PA 19355

Re: Industrial Waste Pollution
Incident Prevention Plan
Bishop Tube Company
East Whiteland Twp., Chester Co.

Dear Mr. Janus:

This will confirm receipt of your letter of April 7, 1976 in response to our meeting on March 19, 1976. I have already sent under separate cover the material which you will need to make an application for an industrial waste permit.

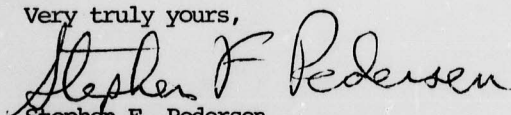
I am not exactly certain what happened when Gilbert Associates submitted their plans and reports. Apparently, somewhere along the way, the Department was led to believe that Bishop Tube was going to use a completely closed system and would not have any discharge to the waters of the Commonwealth. Consequently, this information was relayed to the Environmental Protection Agency; they, subsequently, stopped their process of requiring Bishop Tube to obtain a N.P.D.S. permit. Bishop Tube should, at the same time as it submits application to the Commonwealth, also submit or resubmit its application to EPA.

A routine sample taken by a representative of Chester County Health Department revealed that a discharge thought to be the same as Bishop Tube's discharge 001 contained a relatively high amount of fluorides. The analysis showed the discharge to contain 11.4 ppm of fluoride. The sample was taken from a 12" discharge pipe location just east of the Bishop Tube Company. Is Bishop Tube aware of the high level of fluorides in this discharge and do they know why the levels are as high as they are?

The response which you received from Gray Brothers is unsatisfactory. However, if you are unable to subsequently get better information than this, this will not be considered sufficient to prevent approval of the Pollution Incident Prevention Plan. An additional attempt should be made, however, to obtain better

information regarding the subsequent disposal of industrial wastes from your plant. Within fifteen (15) days of your receipt of this letter, please inform me, in writing, as to the date by which we may expect to receive your application and your response to any other questions asked above. Should you have any questions regarding this letter, please feel free to contact me. Any questions regarding completion of the application forms, should be referred to the Facilities Section of this Bureau which can be reached at 631-2411.

Very truly yours,


Stephen F. Pedersen
Environmental Protection Specialist

CC: 30-Day File
Regional Office File ✓
Central Office Files (WQM)

SFP:mc/mj

RLH
action

Bishop Tube Co.

ROUTE 30 AND MALIN ROAD
FRAZER, PENNSYLVANIA 19355

01742462A



PHONE: (215) 647-3450 TWX 510-668-0428 TELEX 83-4511

RECEIVED
JUN 14 1976

REGIONAL OFFICE

June 9, 1976

Department of Environmental Resources
Water Quality Management
1875 New Hope Street
Norristown, Pa. 19401

PA 0013091

Attn: Mr. Stephen Pederson

gsp

Dear Mr. Pederson:

This will confirm our meeting at Bishop Tube on May 24, 1976, and the postponement of the letter until June 15, 1976.

As I stated to you, we have engaged Gilbert Associates to prepare the forms for a D.E.R. permit for our discharge #001, to update the P.I.P. report, and the E.P.A. permit that had been sidetracked.

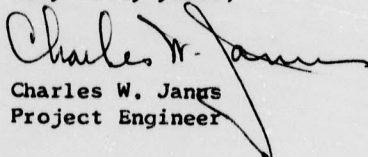
By the end of our annual shutdown August 6, 1976, we plan to have the Open Hearth Furnace cooling water filtered and returned to the recirculating system through the cooling tower. Likewise, the cooling water from the welding machines will be directed to the recirculating system. Therefore, this should eliminate the need for the application to include #002 discharge.

The rain gutter culverts have been cleaned out as per discussion.

The air compressor in the north drive way will also be relocated to the boiler room, and the aftercooler cooling water will be directed to discharge #001 together with the present air compressor aftercooler cooling water.

If you have any questions on any points or parts of this letter, please feel free to contact me.

Very truly yours,


Charles W. Jangs
Project Engineer