

ER BWO 32 REV. 4-77
NOTE: SEE COPY 2
BEFORE SIGNING

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WATER QUALITY MANAGEMENT
WASTE DISCHARGE INSPECTION REPORT

DATE 6-9-81
TIME 8:00 AM

01742735

ESTABLISHMENT BISHOP TUBE CO.	CASE	LOCATION (STREET/STATE ROUTE) MARLIN RD.	COUNTY CHESION	MUNICIPALITY E. WHITELAND	PROGRAM 1W
OPERATOR NAME MR. MICHAEL 14364700	VALID CERTIFICATE POSTED YES <input type="checkbox"/> NO <input type="checkbox"/>	TELEPHONE NO.	POP SERVED	ACRES UNDER PERMIT	ACRES ALREADY MINED
RESPONSIBLE OFFICIAL VICTOR A. BARBATO, MESIDOC.	ADDRESS BISHOP TUBE CO. MARLIN, PA 19355	TELEPHONE NO. 647 3450	INDUSTRIAL PRODUCTS 1 TURBINE 2 PIPE		
PERSON INTERVIEWED C. CHARLES M. THOMPSON	ADDRESS	TELEPHONE NO.	VIOLATIONS		

TREATMENT PROCESS	NUMBER OF UNITS		REMARKS	VIOLATIONS
	TOT	IN OP.		
			<p>① EMPLOYEES CHARGING PICKLING TANK WITH HF 690 AND HNO₃ 1290 LBS LAST NIGHT 6-8-81.</p> <p>② HEAVY FUMING FROM 3500 3500 GAL ABOVE GROUND HF TANK VENT PIPE NOTICED EARLY A.M. 6-9-81.</p> <p>③ FIRE COMPANIES CALLED IN HOSE KODL TANK DOWN.</p> <p>④ 700 GAL OF HF IN TANK DRAINED INTO A LIQUID WASTE ACID TANK, PLANT TO ADD LINE AND HAD WASTE UNLAWFUL OF HATFIELD, PA. HALL A WAY.</p> <p>⑤ NO DISCHARGE OF HF TO GROUND SURFACE OR SURFACE WATERS.</p> <p>⑥ SOME FUMES COMING FROM HNO₃ TANK VENT PIPE DURING INSPECTION.</p> <p>⑦ RESIDUE WHAT CAUSED HF TANK TO FUME WILL INVESTIGATE, WILL USE DILUTION HF IN OPERATION.</p> <p>⑧ RACED WATERS FROM HOSEING DOWN TANK, RAN DOWN CIRCUMFERENCE INTO SINKHOLE.</p> <p>⑨ WILL BE PREPARING A DDGP PLAN FOR LINES PARTICIPATING IN PAPER 3641.</p>	

SAMPLING POINT	W&W QUALITY REPORT NUMBER	pH	CHLOR RES	COLOR	ODOR	TEMP	D.O.	SPEC COND.	AVG. DAILY FLOW (MGD)	RECEIVING STREAM APPEARANCE		
										NAME	ABOVE DIS APP	BELOW DIS APP
NO SAMPLES										TRIBUTARY TO LITTLE VALLEY CREEK	CLEAN	CLEAR

IDENTIFICATION						FAC NO. 1	FAC NO. 2	FAC NO. 3	FAC NO. 4	DATE OF INSPECTION	INSPECTING AGENCY
1	C	CO	MUN	T	EST	CASE	14-16	14-16	14-16	17-22	23-25
2	A	4-5	6-8	9	10-11	12-13				060981	WQ
3	X										

FACILITY NAME	DIS. VOL. (MGD)	COMPLIANCE				PERMIT COMP	OPER STAT
		FED	INT	FAC	OP		
	49-52	66	67	68	69	70	71-72

PERSON INTERVIEWED (SIGNATURE)		TITLE AND DATE
Charles M. Thompson		Project Engr. 6/9/81
Michael C. Harris		INVESTIGATOR (SIGNATURE)
		TITLE AND DATE
		WQ 569-81

CENTRAL OFFICE

(USE BLACK INK ONLY)

3WQ-32 REV. 1-73
TE: SEE COPY 2
ORE SIGNING

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WATER QUALITY MANAGEMENT
WASTE DISCHARGE INSPECTION REPORT

01742736

DATE 6-10-81
TIME 5:50

ESTABLISHMENT Bishop Tube Co	CASE 1W	LOCATION (STREET/STATE ROUTE) Malin Rd	COUNTY Chester	MUNICIPALITY E White	PROGRAM 1W
REPORTER NAME Chuck Thompson	VALID CERTIFICATE POSTED YES <input type="checkbox"/> NO <input type="checkbox"/>	TELEPHONE NO.	POP SERVED	ACRES UNDER PERMIT	ACRES ALREADY MINED
RESPONSIBLE OFFICIAL Victor Barbato	ADDRESS same as above	TELEPHONE NO.	INDUSTRIAL PRODUCTS		
PERSON INTERVIEWED Barbato, Levenson, Thompson	ADDRESS	TELEPHONE NO.	1 tubes	2	

TREATMENT PROCESS	NUMBER OF UNITS		REMARKS	VIOLATIONS							
	TOT	IN OP.									
<p>bottom of HF tank. Nitric acid flowed into adjacent hydro- fluoric acid tank (steel) leaving a hole in floor of HF tank. A bin was constructed above grade, by an existing tank of H₂O, added limestone & then lime also added to collected liquid, upon which tanks are undiked, are sitting on 3' base crushed stone & shale. As last diminished tank was shipped, a rubber pad placed over tank vapor depressant foam added that of nitric which flowed into HF tank. unknown, few inches of sludge after HF tank. Clean up crew lost gear Bishop Tube - been unable to locate a 55-gal vacuum truck. Material behind permit needs to be removed immediately & disposed of in a manner acceptable to DEP - may be possible to add enough lime to create a thick slurry which could be loaded into drums. If needed can empty a tank in the mill (Hawthorn) & discharge contents of HF tank into mill tank knot connections contacted - due out at 10 PM. to leave permit & then tel tomorrow</p>			<p>into adjacent hydro- fluoric acid tank (steel) leaving a hole in floor of HF tank. A bin was constructed above grade, by an existing tank of H₂O, added limestone & then lime also added to collected liquid, upon which tanks are undiked, are sitting on 3' base crushed stone & shale. As last diminished tank was shipped, a rubber pad placed over tank vapor depressant foam added that of nitric which flowed into HF tank. unknown, few inches of sludge after HF tank. Clean up crew lost gear Bishop Tube - been unable to locate a 55-gal vacuum truck. Material behind permit needs to be removed immediately & disposed of in a manner acceptable to DEP - may be possible to add enough lime to create a thick slurry which could be loaded into drums. If needed can empty a tank in the mill (Hawthorn) & discharge contents of HF tank into mill tank knot connections contacted - due out at 10 PM. to leave permit & then tel tomorrow</p>	<p>unpermitted discharge of industrial waste</p>							
SAMPLING POINT	W&W QUALITY REPORT NUMBER	pH	CHLOR RES	COLOR	ODOR	TEMP	D.O.	SPEC COND.	AVG. DAILY FLOW (MGD)	RECEIVING STEAM APPEARANCE	
none										NAME	ABOVE DIS APP
											BELOW DIS APP

IDENTIFICATION						FAC NO.				DATE OF INSPECTION		INSPECTING AGENCY	
1	C	CO	MUN	T	EST	CASE	NO. 1	NO. 2	NO. 3	NO. 4	17 22	23 25	
2	A	45	68	9	10 11	12 13	14 16	14 16	14 16	14 16	06/10/81	WQS	
3	X	not for works											

FACILITY NAME	DIS. VOL. (MGD)	COMPLIANCE				PERMIT COMP	OPER STAT
		FED	INT	FAC	OP		
	49.52	66	67	68	69	70	71 72
1							
2							
3							
4							

PERSON INTERVIEWED (SIGNATURE)	
Chuck M Thompson	TITLE AND DATE Project Engineer 6/10/81
Nash SLS	TITLE AND DATE WQS 6/10/81

REGIONAL OFFICE

NOTE: SEE COPY 2
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DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WATER QUALITY MANAGEMENT
WASTE DISCHARGE INSPECTION REPORT

01742737

DATE 6-10-81

TIME

ESTABLISHMENT <i>Bishop Tube Co</i>	CASE	LOCATION (STREET/STATE ROUTE)	COUNTY <i>Clinton</i>	MUNICIPALITY <i>E White</i>	PROGRAM <i>14</i>
OPERATOR NAME	VALID CERTIFICATE POSTED YES <input type="checkbox"/> NO <input type="checkbox"/>	TELEPHONE NO.	POP SERVED	ACRES UNDER PERMIT	ACRES ALREADY MINED
RESPONSIBLE OFFICIAL	ADDRESS	TELEPHONE NO.	INDUSTRIAL PRODUCTS		
PERSON INTERVIEWED	ADDRESS	TELEPHONE NO.	1.	2.	

TREATMENT PROCESS	NUMBER OF UNITS		REMARKS	VIOLATIONS
	TOT	IN OP		
<i>tank forite (due to thickness of benzene or improper equipment) Bishop personnel will make sure tanks collecting leaking material in drums liquid behind them should be unvented tanks subject to ground + tanks can stay until tomorrow - provided that permit is maintained + wastewater water is collected + hauled out to an appropriate disposal site.</i>				
<i>Surfactant on ground + tanks is the vapor represent foam that might get into the tank.</i>				
<i>It does not appear that any material pollutant reached stream.</i>				

SAMPLING POINT	W&W QUALITY REPORT NUMBER	pH	CHLOR RES	COLOR	ODOR	TEMP	D.O.	SPEC COND	AVG. DAILY FLOW (MGD)	RECEIVING STREAM APPEARANCE	
										NAME	ABOVE DIS APP

IDENTIFICATION							FAC NO. 1	FAC NO. 2	FAC NO. 3	FAC NO. 4	DATE OF INSPECTION	INSPECTING AGENCY
CO	MUN	T	EST	CASE								
1 C	4-5	6-8	9	10-11	12-13	14-16	14-16	14-16	14-16	17-22	23-25	
2 A												
3 X												

FACILITY NAME	DIS. VOL (MGD)	COMPLIANCE				PERMIT COMP	OPER STAT	PERSON INTERVIEWED (SIGNATURE) <i>Charles M. Thompson</i>	TITLE AND DATE <i>Project Engineer 6/10/81</i>
		FED	INT	FAC	OP				
	49-52	66	67	68	69	70	71-72		
1									
2									
3									
4									

REGIONAL OFFICE

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BEFORE SIGNINGCOMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WATER QUALITY MANAGEMENT
WASTE DISCHARGE INSPECTION REPORT

01742738

DATE 6-11-81

TIME 8-

ESTABLISHMENT Bishop Tube	CASE Co - HNO₃	LOCATION (STREET/STATE ROUTE) Malin Rd.	COUNTY Chester	MUNICIPALITY E. White	PROGRAM 1W
OPERATOR NAME C. Thompson	VALID CERTIFICATE POSTED YES <input type="checkbox"/> NO <input type="checkbox"/>	TELEPHONE NO. 647-3450	POP SERVED <input checked="" type="checkbox"/>	ACRES UNDER PERMIT <input checked="" type="checkbox"/>	ACRES ALREADY MINED <input checked="" type="checkbox"/>
RESPONSIBLE OFFICIAL V. Barbato	ADDRESS Malin Rd.	TELEPHONE NO. 647-3450	INDUSTRIAL PRODUCTS SS tubes		
PERSON INTERVIEWED C. Thompson	ADDRESS	TELEPHONE NO.			

TREATMENT PROCESS	NUMBER OF UNITS		REMARKS	VIOLATIONS
	TOT	IN OP		
<p>Cool are discharge</p> <p>Line between 2 tanks has been disconnected so that tank is isolated.</p> <p>Initial leak before containment ~ 10-20 gallons; still small drip-bucket underneath. White Corrosives pumped what they could from containment; residue will be absorbed & buried. Did not pump sludge out of HF tank - pump not adequate. HF tank & 6 yds Rd - now tank should be in for August (will have top discharge)</p> <p>Cooling water discharge & downstream should be sampled tested pH several times a day - any changes in pH should be immediately reported to D.R. Down slope monitoring well (water ~ 20' deep) should also be checked for pH & ground water monitoring program should be initiated ASAP. Bishop's pH meter fluctuates widely & not accurate, meter should be used, unless Bishop's can be calibrated. Not yet sure how HF will be emptied & removed. Flood tank down once, will again before being relocated (to collect sewage from under tank farm)</p>				<p>Continuing</p> <p>Hot</p>
LAW, REGULATIONS OR PERMIT NO. & COND.				
<p>Clear</p> <p>Shoreline</p>				

SAMPLING POINT	W&W QUALITY REPORT NUMBER	PH	CHLOR RES	COLOR	ODOR	TEMP	D.O.	SPEC COND.	AVG. DAILY FLOW (MGD)	RECEIVING STREAM APPEARANCE		
										NAME	ABOVE DIS APP	BELOW DIS APP
Little Valley	117142	6.8								Little Valley		
effluent	117143	5.70										

IDENTIFICATION							FAC NO.				DATE OF INSPECTION		INSPECTING AGENCY	
1	C	CO	MUN	T	EST	CASE	NO. 1	NO. 2	NO. 3	NO. 4	17 22		23 25	
2	A	4-5	68	9	10 11	12 13	14 16	14 16	14 16	14 16	06/11/81		WQI	
3	X													

15-15925-002832-30278-00071212
FACILITY NAME

	DIS VOL (MGD)	COMPLIANCE				PERMIT COMP	OPER STAT
		FED	INT	FAC	OP		
1	49.52	66	67	68	69	70	71 72
2							
3							

PERSON INTERVIEWED (SIGNATURE)	
Chas M Thompson	
TITLE AND DATE	
Project Engineer 6/11/81	
INVESTIGATOR (SIGNATURE)	
Marilyn Shroyer	
TITLE AND DATE	
WQI 6/11/81	

REGIONAL OFFICE

COMMONWEALTH OF PENNSYLVANIA
 Department of Environmental Resources
 Bureau of Laboratories
WATER OR WASTE QUALITY REPORT
 ALL CHEMICAL ANALYSES EXPRESSED IN
 MG/L UNLESS OTHERWISE SPECIFIED

 LAB Number **11134**
 Date Received **6/18/81**

 FACILITY SAMPLE
☒ W ☐ S
 STREAM/RANDOM SAMPLE
☐ 1 ☐ 2
 NETWORK SAMPLE

ESTABLISHMENT Bishop Tube Co		CASE HNO₃		FACILITY 01712739		COLL NUMBER 142	
COUNTY Chester		MUNICIPALITY E White		PROGRAM LW		COLL NAME M Ship	
CARD 131 1		ID CODE (ALL CARDS) 4-16 2		LATITUDE 4-10 0		LONGITUDE 11-18 06 11 81	
USGS-O 20-34 7103		AGENCY 35-37 0111		SAMPLE NUMBER 38-43 711412		STREAM NAME 44-57 LITTLE VALLEY	
DATE 19-24 06 11 81						TIME 25-28 08 30	
KIND 29 6						RELATIVE POINT 58	
TRIBUTARY TO: Valley						ADDITIONAL LAB ANALYSES	
FULL DESCRIPTION WHERE SAMPLE TAKEN Cherries Garden Center - below Bishop							
2 bottles Of fixed metals							

FIELD ANALYSES				LAB ANALYSES				
Type Sample	69-60	<input checked="" type="checkbox"/> 1	Chemist	JCH/Wh			Date Analyzed	6/12/81
Source of Sample	61-62	<input checked="" type="checkbox"/> 1	Color	(00080)			Total Solids	(00500)
Reason Sampled	63-64	<input checked="" type="checkbox"/> 4	Turb	(00070)			Susp Solids	(00530)
Composits Sample	Proportional Uniform	65	pH	(00403)	6.6		Sol Solids	(00545)
	Temporal Spatial	66	Spec Cond	(00095)	320		Total Diss Solids	(00515)
Aliquots	67-68	<input type="checkbox"/>	Alk	(00410)			NO ₂ -N	(00615)
Flow	Estimated Measured	69	pH4	(00436)			NO ₃ -N	(00670)
Condition	Above - 1 Normal - 2 Flood - 5 Below - 3 No Flow - 4	80	pH8	(00437)			NH ₄ -N	(00610)
Stream Flow UFS	(00081)		Hot	(00435)			Kjel-N	(00825)
Stream Flow MGD	(50051)		Cold	(00435)			Hardness	(00300)
Pipe Flow-MGD	(50050)		T O.C.	(00880)			Ca ⁺⁺ - diss	(00915)
Gage Reading Ft.	(00065)		C O.D.	(00340)			Mg ⁺⁺ - diss	(00925)
Temp (C)	(00010)		S-Day BOD	(00310)			SO ₄	(00945)
pH	(00400)		T	(00685)			Cl	(00940)
D.O.	(00300)		TO	(00688)	1.05		MBAS	(32280)
Cl (5006C)			Al-Tot ug/l	(01106)	510		Phenols ug/l	(49002)
Br (71871)			Co-Tot ug/l	(01027)	1		Cyanide	(00720)
I (71868)			Cr-Tot ug/l	(01034)	20			
Spec Cond	(00094)		Cu-Tot ug/l	(01042)	10			
Appearance	(46001)		Fe-Tot ug/l	(01045)	220			
Odor	(01330)		Mn-Tot ug/l	(01068)	80			
			Ni-Tot ug/l	(01097)	90			
			Pb-Tot ug/l	(01051)	10			
			Zn-Tot ug/l	(01092)	70			

 How Shipped **Fixed** Date **6/11**
 Legal Seal No. **52218-19**
 Received by **[Signature]**
 Condition of Seal **OK**

COMMONWEALTH OF PENNSYLVANIA
Department of Environmental Resources
Bureau of Laboratories
WATER OR WASTE QUALITY REPORT
ALL CHEMICAL ANALYSES EXPRESSED IN
MG/L UNLESS OTHERWISE SPECIFIED

LAB Number **11165**

Date Received **6/12/81**

☒ FACILITY SAMPLE
☒ STREAM/RANDOM SAMPLE
☐ NETWORK SAMPLE

ESTABLISHMENT Bishop Tube		CASE		FACILITY 01742740		COLL NUMBER 143	
COUNTY Chester		MUNICIPALITY E White		PROGRAM HW		COLL NAME m Sheep	
CARD (3)		ID CODE (ALL CARDS) 4-16		LATITUDE 4-10		LONGITUDE 11-18	
1		2		3		4	
USGS-Q 30-34		AGENCY 33-37		SAMPLE NUMBER 38-43		STREAM NAME 44-57	
7		0		3		011171143	
DATE 19-24		TIME 25-28		KIND 29		RELATIVE POINT 50	
06		11		8		110 010 2	

TRIBUTARY TO: **Little Valley**
FULL DESCRIPTION WHERE SAMPLE TAKEN: **outfall 2 bottles @ metals**
ADDITIONAL LAB ANALYSES

FIELD ANALYSES

LAB ANALYSES

Type Sample	59-60	03	Chemist	JAL	Date Analyzed	6/12/81
Source of Sample	61-62	18	Color	(00080)	Total Solids	(00500)
Reason Sampled	63-64	4	Turb	(00070)	Susp Solids	(00530)
Composite Sample			pH	(00403)	Sol Solids	(00545)
Proportional Uniform	65		Spec. Cond	(00095)	Total Diss Solids	(00515)
Temporal Spatial	66		Alk	(00410)	NO ₂ -N	(00615)
Aliquots	67-68		pH4	(00435)	NO ₃ -N	(00620)
Flow	Estimated Measured	69	pH8	(00437)	NH ₃ -N	(00640)
Condition	Above - 1 Normal - 2 Flood - 5 Below - 3 No Flow - 4	80	Hot Cold	(00435)	Kjel-N	(00625)
Stream Flow-CFS	(00061)		T.O.C.	(00680)	Hardness	(00900)
Stream Flow-MGD	(00051)		C.O.D.	(00340)	Ca ⁺⁺ - diss	(00915)
Pipe Flow-MGD	(00050)		5-Day BOD	(00310)	Mg ⁺⁺ - diss	(00925)
Gage Reading-Ft.	(00085)		P T TO	(00685) (00668)	SO ₄	(00945)
Temp (C)	(00010)		Al-Tot ug/l	(01106)	Cl	(00940)
pH	(00400)		Co-Tot ug/l	(01027)	F	(00951)
D.O.	(00300)		Cr-Tot ug/l	(01034)	MBAS	(32280)
Hal	Cl (50060) Br (71871) I (71868)		Cu-Tot ug/l	(01042)	Phenols ug/l	Dr (46002) Ds (32730)
Spec Cond	(00094)		Fe-Tot ug/l	(01045)	Cyanide	(00720)
Appearance	(46001)		Mn-Tot ug/l	(01055)		
Odor	(01330)		Ni-Tot ug/l	(01067)		
CUSTODY LOG			Pb-Tot ug/l	(01051)		
How Shipped	Wrapped	Date	Zn-Tot ug/l	(01092)		
Legal Seal No.	322140 + 15	5/26/81				
Received by	JAL					
Condition of Seal	OK					

**NOTE: SEE COPY 2
BEFORE SIGNING**

p 2 of 2

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WATER QUALITY MANAGEMENT
WASTE DISCHARGE INSPECTION REPORT

01742741

DATE 6-11-81

TIME

[illegible]

REGIONAL OFFICE

ER BWQ-32 REV. 4-77

NOTE: SEE COPY 2

BEFORE SIGNING

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WATER QUALITY MANAGEMENT
WASTE DISCHARGE INSPECTION REPORT

DATE 6-12-81

01742742 TIME 1:15L

ESTABLISHMENT Dishop Tube Co	CASE C	LOCATION (STREET/STATE/ROUTE) Malin Rd	COUNTY Chester	MUNICIPALITY White	PROGRAM 1W
OPERATOR NAME C. Thompson	VALID CERTIFICATE POSTED YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> n/a	TELEPHONE NO. 647-3450	POP SERVED	ACRES UNDER PERMIT	ACRES ALREADY MINED
RESPONSIBLE OFFICIAL V. Barbato	ADDRESS Malin Rd, Trages	TELEPHONE NO.	INDUSTRIAL PRODUCTS		
PERSON INTERVIEWED	ADDRESS	TELEPHONE NO.	1. tubes (SS)		

TREATMENT PROCESS	NUMBER OF UNITS TOT IN OP	REMARKS	VIOLATIONS
Pickling line shut down. Locks on valves now.			
Containers (C-Steel sludge bucket) w/old emulsite for contaminated earth. Earth must be picked up today. Haven't checked pH of discharge yet - this is important. Have obtained bales for well sampling - check pH now also. Presently no see page from tank farm. Rainfall will cause further seepage from tank farm - this must be collected (prevented from entering stream). Company has proposed digging out lowest point of tank farm area, line bottom + 1' high the side with plastic sheeting, place a sump pump w/in + discharge into collection pit & waste holding tank. Macadam will be washed down again before well be removed. Sump pump must be inspected periodically over weekend (during & after rain).			

SAMPLING POINT	W&W QUALITY REPORT NUMBER	pH	CHLOR RES	COLOR	ODOR	TEMP	D.O.	SPEC COND.	AVG. DAILY FLOW (MGD)	RECEIVING STREAM APPEARANCE
										NAME Little Valley
										ABOVE DIS APP BELOW DIS APP

IDENTIFICATION						FAC NO.				DATE OF INSPECTION		INSPECTING AGENCY	
1	2	3	4	5	6	NO. 1	NO. 2	NO. 3	NO. 4	17-22	23-25		
C	CO	MUN	T	EST	CASE					06/12/81	WQI		
4-5	6-8	9	10-11	12-13		14-16	14-16	14-16	14-16				
NOT for analysis													

FACILITY NAME		DIS. VOL. (MGD)		COMPLIANCE				PERMIT COMP		OPER STAT	
				FED	INT	FAC	OP				
		49.52		66	67	68	69	70	71	72	

PERSON INTERVIEWED (SIGNATURE)		TITLE AND DATE	
Charles M. Thompson	6/12/81	Project Engineer	6/12/81
Mary S.	6/12/81	WQS	6/12/81

(USE BLACK INK ONLY)

CENTRAL OFFICE

Sim - info + then to file

LAW OFFICES

01742537

161-Bishop Tube
E. Whiteland Twp.
Chester Co.

WOLF, BLOCK, SCHORR AND SOLIS-COHEN

TWELFTH FLOOR PACKARD BUILDING

PHILADELPHIA, PA. 19102

(215) LOCUST 9-4000

TELECOPIER: LO 9-1089

TWX: 710-670-1927

WOLBLORR PHA

IN WASHINGTON:

NINTH FLOOR

1100 CONNECTICUT AVENUE, N. W.

WASHINGTON, D. C. 20036

(202) 861-0870

CABLE ADDRESS

WOLBLORR WASHDC

DONALD J. CASSIDY
FAITH R. WHITTLESEY
MICHAEL J. HENRY
ALAN S. KAPLINSKY
NELSON A. DIAZ
MARC E. GOLD
HERMAN C. FALA
STEVEN B. KING
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CHAIM HELFGOTT**
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BRYNN L. MACIVER
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MICHAEL M. DEAN
MICHAEL L. TEMIN
CHARLES G. KOPP
MARVIN KATZ
LEONARD J. COOPER
STEVEN A. ARBITTER
HENRY F. MILLER
JAY L. GOLDBERG
HENRY A. GLADSTONE
H. ROBERT FIEBACH
GERALD J. MCCONOMY
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COUNSEL

ALFRED L. WOLF
HELEN SPIGEL SAX
NATHAN SILBERSTEIN

SAMUEL H. LEVY
MORRIS L. FORER
JOSEPH BRANDSCHAIN

July 10, 1981

*NOT ADMITTED IN PENNSYLVANIA
**ALSO ADMITTED TO BAR OF ISRAEL

DIRECT DIAL NUMBER:

(215) 977-2146

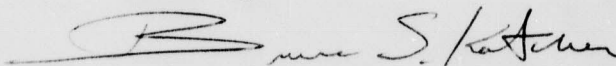
Marilyn Shup
Frank Holmes
Department of Environmental
Resources
Region I - Norristown
1875 New Hope Street
Norristown, PA 19401

Re: Bishop Tube

Dear Marilyn and Frank:

Although it is my understanding that the incidents of June 9 and 10 are being handled primarily through Dick Ruhl in the Air Quality Division, because of your interest in this matter and in order to keep you fully advised as to our progress, I enclose a copy of Vic Barbato's letter of July 10, 1981 to Harold Jeunet, Chairman of the East Whiteland Township Board of Supervisors.

Sincerely,



Bruce S. Katcher
For WOLF, BLOCK, SCHORR and SOLIS-COHEN

BSK:bam
Enclosure

cc: Victor Barbato

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TWELFTH FLOOR PACKARD BUILDING

PHILADELPHIA, PA. 19102

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July 10, 1981

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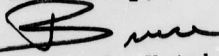
Mr. Leon T. Gonshor
Regional Director
Department of Environmental
Resources
1875 New Hope Street
Norristown, PA 19401

Re: Bishop Tube Company

Dear Leon:

The enclosed letter was sent by Vic Barbato, President of Bishop Tube Company, to Harold Jeunet, Chairman of the East Whiteland Township Board of Supervisors on July 10, 1981, in accordance with our promise to provide the Township with written notification of the steps that have been taken and will be taken to ensure that the incidents of June 9 and 10 would not reoccur. As agreed at our meeting with DER on June 17, the Company also sent copies of the letter to Ral Kona and Dick Ruhl, whom we understand are monitoring the situation directly for DER. Because you were unable to attend that meeting I wanted to make sure that you also received a copy so that you would be aware of Bishop's progress.

Sincerely,



Bruce S. Katcher

For WOLF, BLOCK, SCHORR and SOLIS-COHEN

BSK:bam
Enclosure
cc: Victor Barbato

JUL 14 1981

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sum/wll
RP
(with only)

Bishop Tube Co.

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ROUTE 30 AND MALIN ROAD
FRAZER, PENNSYLVANIA 19355



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

July 10, 1981

Harold F. E. Jeunet
Chairman, East Whiteland Township
Board of Supervisors
East Whiteland Township
Pennsylvania

Dear Mr. Jeunet:

As you are so well aware, on Tuesday, June 9, and again on Wednesday, June 10, fumes were emitted from a vent of a tank at Bishop Tube Company which caused the East Whiteland Volunteer Fire Department to decide it was appropriate to evacuate the General Warren Village for a period of time. Vents, of course, are a natural safety feature of these tanks and, fortunately, they worked well. Unfortunately, other problems arose that caused all of us to have a hectic period.

It is the purpose of this letter first and foremost to assure you of Bishop's concern for the safety of its employees and the residents of General Warren Village and, secondly, to fulfill my personal promise to you on Friday, June 12 to provide you with written notification of the steps we have taken and will be taking to insure that the problem which occurred will not reoccur.

General Comments

As you know, notwithstanding the fact that you had obtained a court Order without notice to us which essentially shut down our business, we willingly went forward with our previously scheduled meeting the next day with you and representatives of the various interested groups (police, fire, residents, and your expert). While a major purpose of ours at that meeting was to convince you to modify that Order, another purpose was to try to convince you that we,

too, had been very concerned about these incidents. My key personnel and I, like you, the residents, others from the township, the volunteer fire department and other governmental representatives operated on few hours of sleep during the week of June 8. We were concerned about the residents, about our employees and also about the continuation of our business, a business that has been located at the same place for thirty years and prior to almost all, if not all, of the development of the General Warren Village as a residential area.

We tried to communicate that concern to all of those at the meeting of June 12. If you recall when our attorney started that meeting, he was somewhat surrounded by an understandably unfriendly group of ten people. In addition to yourself, that group consisted of two attorneys representing the Township, the chief of police, the assistant chief of the fire department, another policeman, an expert environmental engineer and lastly, but far from least, two representatives of the residents. At that time (under very short time period restraints) we tried to forthrightly set forth the facts of what had been done to stop the problem at that time. We discussed with you our willingness to take further steps and have set forth those steps in this letter, as we agreed we would. At the meeting I think we convinced you of our bona fides and good faith -- at least it seemed that way as we all shook hands at the end of that long morning.

Our cooperation is reflected in the facts that follow in this letter. As you know, we negotiated with your counsel two court Orders after that meeting and voluntarily agreed to appear at a meeting on Wednesday, June 17 with the Commonwealth of Pennsylvania Department of Environmental Resources, you, and many of those at our Friday meeting. I am told, although I was not present that our representatives followed my instructions and again were open and forthright in answering the questions put to them. Indeed I am told that the Department person conducting the meeting sought as a guideline at the beginning of the meeting the requirement that the meeting would end if our representatives did not answer questions, and, at the end, he openly agreed that his guidelines had been met.

In addition to the steps taken by the police and volunteer fire department, both of whom operated as dedicated public servants in the line of duty, for which we are most grateful, Bishop took the following steps during these episodes or immediately thereafter.

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1. All of the acid in the hydrofluoric acid tank was drained out of that tank and into a pickling tank inside the plant itself. That pickling tank was subsequently emptied and the liquid processed without any further problems.

2. Bishop first placed a water hose into the tank in an effort to reduce the venting. It then opened the tank by ripping off a cover bolted to the tank and poured bags of limestone it acquired on an emergency basis into the tank in order to neutralize any acid that may have been in the tank. Because holes developed in the bottom of the tank allowing some of the waste water to leak out of the tank, we immediately established an earthen dam around the tank enclosure. We believe we prevented any of the liquid from entering the tributary of Little Valley Creek that runs nearby the plant. A back hoe was brought in to make that dam larger. Subsequently that dam has been removed and the dirt placed into a container certified for waste disposal; the container was then hauled away by a professional hauler for permanent disposal at an approved waste disposal land fill.

The above actions were taken to protect the environment. More importantly, Bishop acted to make sure that there would be no problem with future incidents. It is and was acutely aware of, and concerned about, the inconvenience and anxiety felt, as well as the safety of, both the residents of the nearby village and its own employees.

3. A ten-foot section of pipe connecting the two storage tanks was removed and a blind flange placed on the ends of the remaining pipes. This means that the two tanks were totally unconnected from each other and there was, and continued to be, no way to have the liquids flow from one tank to the other.

4. The one tank which became inoperative remained so with only a limestone sludge in it. This sludge had been neutralized to a pH of approximately 4, a very mildly acidic solution. We promised in the interim that this tank would not be used other than to hold the solution. As you know, we agreed to a court order with its contempt sanctions prohibiting further use, and have obeyed that order. Just last week the solution was properly disposed of and the tank was cleaned, removed and also properly disposed of.

5. Prior to our meeting on Friday, June 12, we removed the vent from one of the two tanks. (You will note that those vents had at all times for safety reasons vented, into a terra cotta stone floor for absorption.)

6. Also prior to our Friday June 12 meeting, we installed a chain lock system on the valves from each of the tanks and instituted a double check system. Henceforth, whenever either of the tanks is to be used, the pickling operator will have to obtain a key which he will not maintain and will only open the valves upon supervision of his supervisor.

7. We began using acid in drums to replace that from the tank we could no longer use. This is a more expensive procedure, since we are not able to buy and store in bulk. Absent emergencies or unusual circumstances these drums will be bought as needed and in amounts as needed so that we may avoid to the extent reasonable any storage. To the extent there is storage we have agreed to a court order subject to contempt sanctions for its violation requiring that these drums be stored inside the plant. I would also point out that this is not a new procedure to Bishop. At times of chemical shortage, we have used this method of mechanical handling in the past.

8. We have further agreed that the only mixing of acids will be in the pickling vat tanks on the lower level inside the plant (with the exception of laboratory use). The agreement concerning mixing acids is subject to the court Order.

As we have explained to you the pickling process is in an old, extensively used process in the steel industry and the related galvanizing industry. On a national scale the process emanates from the 1800's. It involves first placing water in a vat which serves as a diluent of any acids that are placed into the tank thereafter. Thus when acids are mixed it will only be after water is placed in the vat in accordance with the practice that has been used at Bishop for thirty years.

We did make an exception for laboratory use but that too would be done only by first using water as a diluent -- again a procedure used for many years.

9. A new tank is on order to replace the old one but will not be delivered until August. We had already determined prior to our meeting with you on June 12 that a

separate line to the pickling vats from that tank would be installed and that that line would be maintained separately from the other line. We have agreed to place that separate line installation and maintenance into a court order and further agreed in the court order to give you notice of the installation prior to affectuating its use. Although not subject to court order or other government compulsion, we have also agreed to supply drawings to the Department of Environmental Resources prior to use of the new tank and separate line. Those engineering drawings were requested by the Department at our meeting of June 17. Without even consulting me, our attorneys agreed to supply the drawings. I willingly concurred in that decision after I heard of it.

10. All claims made to us by the residents for their out of pocket expenses relating to these incidents are in the process of being investigated and paid. My last information is that eighty percent (80%) of the claims made have been paid - eighteen out of twenty-three. As to the remaining five, there are complications but we are further informed that our representatives are actively seeking to resolve the remaining ones. You will note that no releases have been sought as a condition of those payments.

In addition to the above, we will be doing the following:

11. In accordance with your idea very forcefully and convincingly made firstly at our June 12 meeting, and, then again, I am told, at the meeting with the Department of Environmental Resources on June 17, we will be investigating the possibilities of a mechanical fail safe device so that even with the separate lines there would be no introduction of acids into the pickling tanks without water first being there. However, I want you to know that the incident which this is designed to prevent has not occurred in the thirty years since Bishop has been at this location to the best of my knowledge. Certainly I recall nothing in the nine years I have been at Bishop. The vats are in full view of employees, whose own health and safety are involved in preventing this mistake. The self interest of these persons is a strong factor against its happening. Nonetheless, if your suggestion proves to be feasible on a cost benefit ratio, giving significant import to the psychological benefits as well as the actual ones, we would install such devices.

12. You also suggested for the first time at the June 17 meeting with Department of Environmental Resources that valves for the tanks be located solely inside the

plant, not outside where the tanks are located. While in the first instance this seems to be a beneficial suggestion, our present technical information is that it would not be functionally practical. However, at the same time we investigate the installation of mechanical devices we will also raise this question and explore whether it too is feasible. A potential compromise solution may develop.

13. In the event that there ever is a spill located at the storage tanks, we are investigating now the feasibility of implementing an improved catch basin so that the earthen dam proceedings used on an emergency basis will not have to be used. We will also switch the temporary chain locks to a more substantial locking system on the valves and we will investigate the feasibility and desirability of erecting a fence around the tanks to restrict access to authorized personnel.

14. As you know, we are in the process of preparing a Preparedness, Prevention, and Contingency Plan (called a PPC) to update our Pollution Incident Prevention Plan (PIP). We have already committed as of our June 12 meeting to meet with John Meyers, Assistant Chief of the Fire Department prior to the finalization of this plan. It is intended that he will have input with regard to emergency plans as well as maintenance suggestions. At the June 17 Department of Environmental Resources meeting you asked if we would also include the fire marshall of the township since Mr. Meyers is with the volunteer fire department, a separate entity neither funded nor governed by the township. We agreed to include him and will do so.

15. In order to prepare and implement an appropriate PPC plan, we have hired a registered professional environmental engineer as a consultant. He and his firm will work with us and the Department of Environmental Resources to develop that plan. We will also ask him to review the various items contained in this letter for his input as to any improvements thereon.

We hope you are satisfied that our attempts to solve these problems are genuine. While we are not legally obligated to carry out most of those steps outlined here I can assure you that Bishop will do its utmost to live by the words of this letter, and I can assure you personally that its utmost is sufficient to accomplish what it has set out to do in this letter. If there is anything further that a responsible public official or responsible resident can suggest to us as a means of further securing the safety as

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well as the emotional security of the residents and the Township, we will be happy to consider and investigate such suggestions with reasoned good faith and implement them if we can.

I hope that we have met our promise to send you a full and complete letter of what we have done and what we intend to do.

Sincerely yours,

Victor Barbato
President, Bishop Tube Company

VB/lr

cc: John F. Finn, Vice Chairman, Board of
Supervisors
Florence D. Hunt, Member, Board of
Supervisors
J. Donald Reimenschneider, Township Manager
Ral N. Kona, Air Pollution Control Engineer
Department of Environmental Resources
Richard L. Ruhl, Air Pollution Control Engineer
Department of Environmental Resources