

DEP - RECEIVED  
SOUTHEAST REGION

3826 Old Easton Road  
Doylestown, PA 18902

AUG 07 2019

August 05, 2019

PA DEP  
2 East Main Street  
Norristown, PA 19401-4915

Attn: Joshua Crooks  
Re: Easton Road PFC Site

Dear Mr. Crooks,

Relative to your letter of July 05, 2018, please be advised that Arbonite Corporation has been defunct for over 26 years. Peter Fritchman has never been associated with Arbonite Corporation.

P&R Industries operated a coating and lining facility at this location under the trade name "Arbonite" during the time period noted in your letter. P&R Industries sold the ongoing operations to Valjon Industries and P&R Industries ceased operations on March 1<sup>st</sup>, 2018. As such, much of the information/documentation that you are asking for is not available anymore.

1): Substances. I would suggest that you contact David Smith of the PA DEP in Norristown (484-250-5064) who has in his possession a rolling spread sheet that delineates the use of hazardous (VOC and HAP containing) materials used at this site. David has been overseeing this site for some 10-15 years, at least until March 01 2018, and can provide you with an accurate depiction of the way these materials were handled and stored. I have attached a list of typical paints stored. I want to stress that these materials were NOT stored in the building that had the fire.

None of these materials were ever released into the environment. All waste materials were held and disposed of according to PA DEP regulations. The "paint waste", which consisted of clean up solvents and paint residue from cleaning spray lines, was drummed in proper containers, stored on proper retainment skids, and hauled away by Philips Services in Hatfield every six months or sooner.

Arbonite did not formulate or make coatings on site, rather these materials were purchased on the open market and subsequently applied by Arbonite/P&R to customer property.

The company was billed \$3215.69 by County of Bucks HazMat for 90 gallons of National Universal Gold Foam Concentrate 1/3%. Per the attached data sheet, this material contains no PFOS. I want to stress that the vast majority of the firefighting efforts involved the use of water as both hydrants and several tanker trucks were used.

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2) Coating materials have been in use at this site from the late 70s. The storage, disposal and use of the specified coating materials has been ongoing since 1993 through till March 01 2018. The current owner/operators continue this good industrial material handling.

3) Materials were stored in dedicated paint storage units located outside of the building(s). Any materials stored inside were kept in flammable storage lockers overnight. Waste materials, such as spent solvents from cleaning paint lines, were collected in appropriate drums and stored per DEP regulations. This operation was routinely inspected by the PA DEP.

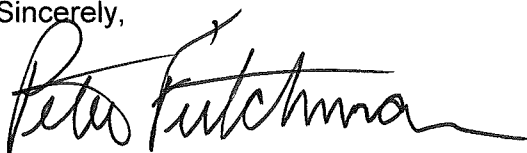
4) Routine liquid waste remediation was performed by Phillips Services in Hatfield, PA. Copies of waste manifests are not readily available. Waste from the fire was disposed of by Phillips Services.

5) There are two capped wells on the property. The site went to city water several years before the fire in 11/2012. My recollection is that the switch to city water was due to the presence of TCE and MBTE anti-knock gasoline additives in the groundwater/wells. The sampling and sampling results were performed by the DEP. There may be a sampling well nearby from that situation.

6) P&R Industries, the operator of Arbonite during this time frame, sold the ongoing business to Valjon Industries. P&R Industries ceased operations on March 01, 2018. P&R Industries has no assets or liabilities.

7) Please see the attached incident report which I believe that you already have. The fire was confined to what is known as "Building One". The use of the foam was confined to the rubber storage area (not a trailer as noted in the report) but in a back room of building one which did not actually burn. Due to the heat of the combustion, the rubber started to smolder and smoke so the foam was applied. This was all determined and directed by the firefighting team, not Arbonite. The liquid was absorbed into the uncured rubber which was subsequently hauled away by Philipis Services.

Sincerely,



Peter Fritchman  
Former President of P&R Industires

**PAINT STORAGE ROOM CONTENTS:**

**ARBON382**

<u>Material</u>	<u>Supplier</u>	<u>Type/Category</u>	<u>Container Size</u> (gal)	<u>No. of Containers</u>	<u>Total Gallons</u>
Plasite 4100/4110 Part A	Carboline	1C, Flammable	3	6	18.00
Plasite 4100/4110 Part C	Carboline	1B, Flammable	3	6	18.00
Plasite 4100/4110 Part D	Carboline	2, Combustible	0.125	6	0.75
Plasite 7122 VOC Part A	Carboline	1B, Flammable	4	2	8.00
Plasite 7122 VOC Part B	Carboline	2, Combustible	1	2	2.00
Plasite 71 thinner	Carboline	1B, Flammable	5	1	5.00
Plasite 20 thinner	Carboline	1B, Flammable, (?)	5	2	10.00
Heresite P-403L	Heresite	1A, Flammable, (?)	5	2	10.00
S-276 thinner	Heresite	1A, Flammable, (?)	5	1	5.00
Macropoxy 646 Part A	Sherwin-Williams	1C, Flammable	5	1	5.00
Macropoxy 646 Part B	Sherwin-Williams	1C, Flammable	5	1	5.00
Hi-Solids Polyurethane Part S	Sherwin-Williams	2, Combustible	4	2	8.00
Hi-Solids Polyurethane Part T	Sherwin-Williams	2, Combustible	1	2	2.00
Fast-Clad DTM Urethane Part A	Sherwin-Williams	1B, Flammable	3	12	36.00
Fast-Clad DTM Urethane Part B	Sherwin-Williams	1C, Flammable	1	12	12.00
Chemlock 289 primer	Lord	1B, Flammable	5	6	30.00
Chemlok 290 intermediate	Lord	1B, Flammable	5	6	30.00
Chemlok 286 tack cement	Lord	1B, Flammable	5	12	60.00
Blair P-100 primer	Blair Rubber	1A, Flammable, (?)	1	5	5.00
Blair I-100 intermediate	Blair Rubber	1B, Flammable	1	5	5.00
Blair 600EP tack cement	Blair Rubber	1B, Flammable	1	5	5.00
C-600 Activator	Polycorp	1B, Flammable	5	1	5.00
021052 Neoprene Tack	Polycorp	1B, Flammable	5	2	10.00

**Totals By Type:**

Type 1A	11	8	20.00
Type 1B & 1C	61	80	262.00
Type 2	6.125	12	12.75

**Room Grand Total:**

<b>100</b>	<b>294.75</b>
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County Commissioners

CHARLES H. MARTIN, *Chairman*  
JAMES F. CAWLEY, ESQ.  
DIANE M. ELLIS-MARSEGLIA, L.C.S.W.

John D. Dougherty, Jr.  
EMA Coordinator

Raymond H. Hackman  
HIRT Coordinator

November 21, 2012

Arbonite  
3826 Old Easton Rd  
Doylestown, PA 18901  
Attn: Peter Fritchman

To Whom It May Concern:

In accordance with PA State Law Act 165-1990 section 210, recovery of response cost, we are requesting reimbursement for the response to an incident at your facility on November 20<sup>th</sup> 2012.

Make check payable to "**Bucks County Hazardous Materials Emergency Response**", and mail to the Bucks County Emergency Management Agency, 911 Freedom Way, Ivyland, PA 18974. We request that you act on this reimbursement **within 30 business days**.

We are invoicing for the following items:

	<u>Total</u>
1 Team Member Man Hours ( 11 members @ \$10.00/hr for 4 Hrs.)	\$ 440.00
1 Team Coordinator ( 1.5 hrs @ \$ 43.90)	\$ 65.85
1 EMA Specialist ( 2 hrs @ \$ 40.47)	\$ 80.94
90 Gallons National Universal Gold Foam Concentrate 1/3% @ \$ 29.21 / Gallon	\$ 2628.90
	<hr/> Total \$ 3215.69

Thank you and if you have any questions feel free to contact my office.

Sincerely,

Raymond H. Hackman  
HIRT Coordinator



## Universal<sup>®</sup> Gold<sup>C6</sup>

1%/3%

Alcohol Resistant Aqueous Film-Forming Foam

NFC420



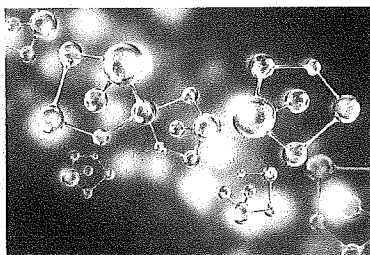
### Assurance

*Firefighting and environmental performance you can rely on*

National Foam prides itself on the open and honest way in which we conduct our business throughout the world. Our foams are an extension of our ethical beliefs and we pride ourselves in being the responsible foam manufacturer, balancing high performance with minimal environmental impact.

### C6 Technology

Environmentally Responsible Universal<sup>®</sup> Gold<sup>C6</sup> 1%/3% alcohol-resistant aqueous film forming foam (AR-AFFF) is used at 1% or 3% concentration to extinguish hydrocarbon fires, and 3% for polar-solvent (water miscible) fires. The C6 Fluorosurfactants have been developed and refined specifically to lower the environmental impact without reducing performance. This new formulation demonstrates National Foam's commitment to superior flexibility, firefighting performance, and environmental responsibility. It is suitable for use with most types of proportioning and discharge equipment.



- ☑ Environmentally responsible foam concentrate.
- ☑ Suitable for use with fresh or sea water.
- ☑ Compatible with a wide range of proportioning and foam making devices.
- ☑ Suitable for use with foam compatible dry powder extinguishing agents.
- ☑ Listed for use on hydrocarbons at 1% or 3% proportioning.
- ☑ Listed for use on a wide variety of polar solvent fuels at 3% proportioning.
- ☑ Underwriters Laboratories, Inc.
- ☑ Underwriters Laboratories of Canada (ULC).
- ☑ United States Coast Guard (USCG) for 3% only.

Universal Gold<sup>C6</sup> 1%/3% is an AR-AFFF concentrate with a special biosynthesized polymer. This polymer is designed to fulfill two functions. The first is to form a protective membrane between the fuel and the foam as it contacts the water-miscible fuel, making extinguishment possible. The second function is to make the foam more stable and heat-resistant, resulting in better burnback resistance and sealability compared to conventional AFFFs. The unique state-of-the-art Universal Gold<sup>C6</sup> 1%/3% concentrate formulation is recognized by United States Patents 4,999,119 and 5,207,932.

Universal Gold<sup>C6</sup> 1%/3% is used in fire suppression systems and manual applications to fight the broadest range of Class B fires. Its versatility simplifies the extinguishment of unknown Class B fuels. Typical applications include storage tanks, loading racks, docks, process areas, warehouses, spills, etc.

### Typical Physical Properties

Appearance.....	Amber-Colored Viscous Liquid
Specific Gravity at 77°F(25°C).....	1.03
pH.....	8.2
Viscosity.....	2,800 cP*
Freezing Point.....	26°F(-3°C)
Min Usable Temperature.....	35°F(2°C)
Max Usable Temperature.....	120°F(49°C)

\*Brookfield #4 Spindle @ 60 rpm. Viscosity measured under different shear conditions will vary because of pseudoplastic rheology of this non-Newtonian product.

### Storage and Handling

Universal Gold<sup>C6</sup> 1%/3% is ideally stored in its original shipping container or in tanks or other containers which have been designed for such foam storage. Recommended construction materials are stainless steel (Type 304L or 316), high density cross-linked polyethylene, or reinforced fiberglass polyester (isophthalic polyester resin) with a vinyl ester resin internal layer coating (50-100 mils). Refer to National Foam Technical Bulletin NFTB100 for further information.

# Universal<sup>®</sup> Gold<sup>C6</sup> 1%/3%

## Alcohol Resistant Aqueous Film-Forming Foam

Universal Gold<sup>C6</sup> 1%/3% foam concentrate is freeze/thaw stable. Should the product freeze during shipment or storage, no performance loss is expected upon thawing.

Foam concentrates are subject to evaporation which accelerates when the product is exposed to air. Storage tanks should be sealed and fitted with a pressure vacuum vent to prevent free exchange of air. The recommended storage environment should be within the UL listed temperature range of 35°F to 120°F (2°C to 49°C). When product is stored in atmospheric storage tanks, contents must be covered with 1/4-inch (6.35mm) of National Foam Seal Oil to ensure prevention of air coming into contact with the foam concentrate. Use of Seal Oil is only recommended in stationary storage tanks. Refer to National Foam Technical Bulletin NFTB100 or National Foam product data sheet NFC950 for further information.

It is recommended that Universal Gold<sup>C6</sup> 1%/3% not be mixed with any other type of foam concentrate in long-term storage. Such mixing could lead to chemical changes in the product and a possible reduction in or loss of its firefighting capability. Most expanded foams are compatible for side-by-side application during an incident.

### **Shelf Life, Inspection, and Testing**

The shelf life of any foam concentrate is maximized by proper storage conditions and maintenance. Factors affecting shelf life are wide temperature changes, extreme high or low temperatures, evaporation, dilution, and contamination by foreign materials. Properly stored National Foam AR-AFFF foam concentrates have been tested and shown no significant loss of firefighting performance, even after 25 years.

Annual testing of all firefighting foams is recommended by the National Fire Protection Association (NFPA). National Foam provides a Technical Service Program to conduct such tests. Refer to National Foam product data sheet NFC960 for further details on Technical Service Program.

### **Environmental and Toxicological Information**

Universal Gold<sup>C6</sup> 1%/3% contains no ingredients reportable under the Superfund Amendments and Reauthorization Act (SARA) Title III, Section 313 of 40 CFR-372 or the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) as of July 1, 1995. National Foam Concentrates do not contain PFOS in accordance with USEPA Stewardship Program 2010/2015.

Prevent foam concentrate and foam solution from entering ground water, surface water, or storm drains. Discharge and disposal of Universal Gold<sup>C6</sup> 1%/3% concentrate or foam solution should be made in accordance with federal, state, and local regulations. Refer to National Foam Technical Bulletin NFTB110 for further information.

Universal Gold<sup>C6</sup> 1%/3% has not been tested for acute oral toxicity, primary skin irritation or primary eye irritation. Repeated skin contact will remove oils from the skin and cause dryness. Universal Gold<sup>C6</sup> 1%/3% is a primary eye irritant, and contact with the eyes should be avoided. Users are advised to wear protective equipment. If Universal Gold<sup>C6</sup> 1%/3% enters the eyes, flush them well with water and seek immediate medical attention. For further details, see the Universal Gold<sup>C6</sup> 1%/3% Safety Data Sheet NMS420.

# Universal<sup>®</sup> Gold<sup>C6</sup> 1%/3%

## Alcohol Resistant Aqueous Film-Forming Foam

### Underwriters Laboratories-Listed Application Rates for Universal Gold<sup>C6</sup> 1%/3%

#### Type III Application Rates

Fuel Group	Proportioning %	UL-Listed Rate gpm/ft <sup>2</sup> (lpm/m <sup>2</sup> )
Hydrocarbons	1%	0.16 (6.5)*
Hydrocarbons	3%	0.16 (6.5)*
MTBE/Gasoline Blends (up to 30% MTBE)	3%	0.15 (6.1)
Ethanol/Gasoline Blends (up to 15.6% ethanol)	3%	0.15 (6.1)
Biodiesel (methyl ester from lipid sources)	3%	0.10 (4.1)

#### Type II Application Rates

Fuel Group	Proportioning %	UL-Listed Rate gpm/ft <sup>2</sup> (lpm/m <sup>2</sup> )
Alcohols	3%	0.13 (5.3)
Ethanol	3%	0.10 (4.1)
Methanol	3%	0.10 (4.1)
Aldehydes	3%	0.24 (9.8)
Amines	3%	0.15 (6.1)
Carboxylic Acids	3%	0.15 (6.1)
Esters	3%	0.10 (4.1)
Ethers	3%	0.15 (6.1)
ETBE	3%	0.14 (5.7)
MTBE	3%	0.13 (5.3)
TAME	3%	0.13 (5.3)
Hydrocarbons	3%	0.10 (4.1)
Ketones	3%	0.16 (6.5)
Methyl Ethyl Ketone	3%	0.12 (4.9)
MTBE/Gasoline Blends (up to 17.5% MTBE)	3%	0.10 (4.1)
Biodiesel (ME) Methyl Ester from Lipid Sources	3%	0.10 (4.1)

*For materials marked with an asterisk (\*), refer to NFPA 11 for additional design criteria.*

*Please refer to UL Fire Protection Online Certifications Directory for additional information on application rates and other discharge devices.*

#### Ordering Information

Container	Shipping Weight	Shipping Dimensions	Part Number
5-Gallon Pails (19 liters)	45.5 lb. (20.6 kg)	1.13 cu. ft. <sup>3</sup> (0.032 cu. m)	2130-7340-4
55-Gallon Drums (208 liters)	495 lb. (224.5 kg)	11.1 cu. ft. <sup>3</sup> (0.314 cu. m)	2130-7481-4
275-Gallon IBC Reusable Tote Tank (1041 liters)	2497 lb. (1132.6 kg)	48.2 cu. ft. <sup>3</sup> (1.365 cu. m)	2130-7725-4
330-Gallon IBC Reusable Tote Tank (1249 liters)	2990 lb. (1356.3 kg)	55.8 cu. ft. <sup>3</sup> (1.580 cu. m)	2130-7033-4
Bulk	8.59 lb./gal. (1.03 kg/l)		2130-7001-4

# Universal<sup>®</sup> Gold<sup>C6</sup> 1%/3%

Alcohol Resistant Aqueous Film-Forming Foam

**National Foam**

350 East Union Street, West Chester, PA 19382, USA  
Email: [info@nationalfoam.com](mailto:info@nationalfoam.com)  
[www.nationalfoam.com](http://www.nationalfoam.com)

National Foam operates a continuous program of product development. The right is therefore reserved to modify any specification without prior notice and National Foam should be contacted to ensure that the current issues of all technical data sheets are used.  
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07/18 NFC420 (Rev S)



Department of Environmental Protection		GENERAL INSPECTION REPORT		Bureau of Land Recycling and Waste Management	
Type of Inspection	WM Identification Number	Entry Time/Date	Exit Time/Date		
Incident Investigation	PAR000029033	November 20, 2012			
Facility/Incident Name and Location			Municipality		
Arbonite Coatings & Linings			Buckingham Twp.		
3826 Old Easton Road Doylestown, PA 18901			County Bucks		
Name, Address of Responsible Official		Title			
Peter Fritchman		President			
		Telephone	Interviewed		
		215-348-2950	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		

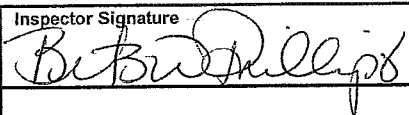
On November 20, 2012 an incident inspection was conducted at Arbonite Coatings & Linings ("Arbonite"), located at 3826 Old Easton Road in Doylestown, following a fire at the facility earlier in the day. Inspection conducted by Betsie Phillips, Solid Waste Specialist for the PA Department of Environmental Protection ("Department"). Also representing the Department was Alex Page and Kirsti Kraus, Solid Waste Specialists. Paul Jardel, Water Quality Specialist, was also on-site. Peter Fritchman, company President, provided information and a tour of the site. The following was observed:

Arbonite applies protective coatings and linings to tanks, valves, and other equipment. The facility is comprised of five separate buildings. Only the main building, which houses the boiler, warehouse space, and offices, burned in the fire. The fire was believed to have started in the boiler area. Primarily, unvulcanized rubber and steel equipment were stored in the warehouse. Mr. Fritchman stated that no chemicals were affected by the fire, as they are stored in a box trailer and shed behind the warehouse. The contents of the trailer and shed were observed and appeared undamaged by the fire.

The firefighting water and residue appeared to have discharged to a storm drain leading to a tributary of Pine Run. Mr. Jardel collected stream samples to determine if there was any impact from the runoff.

Attached to the end of this report are photographs of the site taken by Mr. Page and Mr. Jardel's incident report.

A complete hazardous waste generator inspection will be conducted at a later date.

Inspector Name	Inspector Signature	Headquarters	Date
Betsie Phillips		SERO 2 East Main Street	11-21-12
		Norristown, PA 19401	Telephone 484-250-5762
Person Interviewed Name	Signature of Person Interviewed	Title	Telephone
	Copy mailed to facility		

*This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.*

*This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.*

*Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.*