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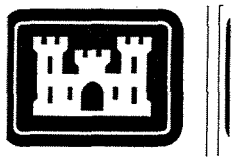

United States Environmental Protection Agency, Region III
Corrective Action Program

Environmental Indicator Inspection Report

for

Pennsylvania Transformer Technology, Inc.
Canonsburg, Pennsylvania
EPA ID# PAD 004 339 297

Prepared By

United States Army Corps of Engineers
Pittsburgh District
October 21, 1999

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ENVIRONMENTAL INDICATOR INSPECTION REPORT
PENNSYLVANIA TRANSFORMER TECHNOLOGY, INC.
26 MAY 1999

Purpose: To gather relevant information from high priority RCRA facilities in order to determine whether or not human exposures and groundwater releases are controlled.

Documentation Review: An extensive record search took place at the Pennsylvania Department of Environmental Protection (PADEP), Southwest Regional Office in Pittsburgh, Pennsylvania. The record search included the review of available documents for RCRA permit applications, historical spills and releases, closure documents, correspondence between USEPA, PADER/PADEP and facility owners, and documentation of previous environmental investigations or studies. Documents obtained during the document review are included in Appendix A through C. Mr. Gale Campbell of the Southwest Regional Office has extensive knowledge of the facility and was contacted prior to the site visit. Mr. Campbell provided his insight regarding the history of the facility as well as his environmental concerns.

Meeting Summary: The environmental indicator meeting and site visit commenced at 9:00 a.m. on Wednesday, May 26, 1999. Mr. Marcos Aquino of USEPA Region III began the meeting by stating the purpose of the inspection and verifying that the facility had received the letter dated November 19, 1998 from Mr. Paul Gotthold of EPA Region III. Facility's history, products, changes in the plant operation, historical releases, waste management practices, and previous environmental investigations were discussed. Upon completion of the meeting, an inspection of the facility was conducted. Photographs taken during the inspection are included in Attachment 2. A list of attendees is provided below.

Attendees:

NAME	AGENCY/COMPANY	POSITION	PHONE NO.
Corey Alexander	PA Transformer Technology Inc.	Plant Chemist	724-873-2222
Richard L. Pacilla	PA Transformer Technology Inc.	Plant Manager	724-873-2360
Dilip J. Kothari	USACE, Pittsburgh District	Environmental Engineer	412-395-7314
Nancy L. Taylor	USACE, Pittsburgh District	Environmental Specialist	412-395-7320
Marcos Aquino	US EPA, Region III	Remedial Project Manager	215-814-3422
Hilary Livingston	US EPA, Region III	Remedial Project Manager	215-814-3449
Shawn Staley	PADEP, Southwest Region	Waste Management Specialist	724-942-7245

A. Location and operational history of the facility, including all wastes generated at the facility and their management.

The Pennsylvania Transformer Technology, Inc. (PATT) facility is located on Adams Avenue approximately one mile northeast of Canonsburg, Pennsylvania along Chartiers Creek (Figure 1). Several industrial buildings were constructed at the present location in the early 1900's. Subsequently, several manufacturing companies occupied the location. During the 1940's, elimination of a meander loop and subsequent rechannelization of the stream changed the course of Chartiers Creek in the vicinity of the plant. The plant's newest construction presently overlies a section of this inactive stream. Figure 2 shows the layout of the facility.

Between 1946 and 1985, the facility was operated by McGraw-Edison Power Systems (McGraw-Edison). McGraw-Edison operated the facility as an electrical transformer manufacturing/reconditioning center. The main products produced at the McGraw-Edison Facility were power transformers of both standard voltages and extra high voltages, load tap charger transformers, oil filled bushings of many types, oil circuit breakers, and special electrical products designed to exacting requirements. Askarel-containing dielectric fluids were used in limited (less than one percent) production of transformers at this site from approximately 1946 through mid-1967 when the last unit containing Askarel oil was completed on May 5, 1967. (Askarel is a brand name for a dielectric fluid containing PCBs while Aroclor 1260 is a commercial name for a form of PCBs.)

In 1985, Cooper Power Systems (Cooper) bought the Facility from McGraw-Edison and continued to manufacture switchgear and transformers. Cooper also operated an electroplating line which used silver, tin, zinc and zinc phosphate in the process. Wastewater from electroplating operations was treated at the permitted onsite wastewater treatment plant. The wastewater treatment plant is located in Building 20 and is not currently used by the Facility.

In 1996, PATT purchased the Facility from Cooper and began operations in 1997. PATT continues to manufacture transformers, however, current hazardous waste generated from processes at the facility is limited to paint related waste and parts cleaning solutions. No electroplating takes place at this Facility under PATT ownership.

B. Description of all Solid Waste Management Units (SWMUs) and/or Areas of Concern (AOCs) as well as description of known and/or potential releases.

SOLID WASTE MANAGEMENT UNITS

Above ground Storage Tanks: The facility maintains thirteen registered above ground tanks. These include one 150,000-gallon transformer oil tank, one 150,000-gallon heating oil tank (currently not in use), one 3,000-gallon diesel fuel tank and one 8,000-gallon kerosene tank located behind Building 65. One 3,000-gallon scrap oil tank is located outside Building 20, which is currently not used. In addition, there are eight tanks located in an indoor tank farm behind Building 65. These include six 20,000-gallon transformer oil tanks, one 10,000-gallon transformer oil tank and one 10,000-gallon scrap oil tank. These tanks all have secondary containment and are inspected on a regular basis.

Former Askarel Storage Tank Outside Building 20: From approximately 1946 through mid-1967, McGraw-Edison used Askarel-containing dielectric fluids in limited (less than one percent) production of transformers at the Facility. Use of the material ceased in 1966, and a quantity of Askarel on hand was contained in a 9,500-gallon storage tank located just outside Building 20 until 1967, when the company was advised to dispose of it. Historical records indicate that this tank was located to the south of Building 20 in the southwest corner of the facility. Arrangements were then made to remove the material from the tank. In mid-1967, the Askarel tank was linked to soil contamination resulting from historic spills or leaks and removal of the storage tank followed shortly thereafter.

McGraw-Edison conducted limited investigation activities in 1977 to assess potential environmental impacts associated with the Askarel storage tank. Aroclor 1260 was detected in soil samples at varying concentrations up to 1916 parts per million (ppm) in soils in the immediate vicinity of the former Askarel tank. In January 1978, McGraw-Edison implemented a Pennsylvania Department of Environmental Resources (PADER) approved closure plan to address soil contamination associated with the tank. The closure plan included installation of a subsurface concrete barrier wall (Photograph 4) on the west side of the facility to prevent possible leakage into the nearby Chartiers Creek and an asphalt cap. The cap was designed to entomb the contaminated soil in former Askarel tank area (Photograph 3). The soil beneath the asphalt was stabilized to form a base for the pavement cover without removing any contaminated soil and the pavement cover sloped to allow surface water drainage to existing sewers.

Subsequent to its acquisition of McGraw-Edison in 1985, Cooper initiated a second site investigation to further define the extent of Aroclor 1260 in soils that was identified in the previous McGraw-Edison investigation. Soil samples were collected at four depth intervals. Varying levels of polychlorinated biphenyl's (PCBs) up to 6400 ppm were detected in soil samples collected from the southwestern portion of the facility.

Between November 1986 and April 1989, additional investigatory activities were conducted at the site by Fred C. Hart Associates, Inc. (Hart) to delineate the horizontal and vertical extent of PCBs in site soils based on the results of the McGraw-Edison/Cooper investigations. These activities confirmed that a major source of PCBs in the soil appeared to be the former Askarel storage tank. Stream sediments and surface water samples from Chartiers Creek were also collected as part of these evaluation activities. Further site investigations were conducted to evaluate groundwater quality and aquifer characteristics. Overburden and shallow bedrock groundwater exhibited varying concentrations of PCBs. However, the extent of the affected groundwater was found to be limited to a localized area in the southwestern portion of the facility.

In response to issues identified during a March 1989 meeting among Cooper, PADER, and U. S. Environmental Protection Agency (USEPA) personnel, additional work activities were initiated by Earth Sciences Consultants, Inc. (ESC). These work activities were conducted in accordance with PADER-approved work plan. These activities included installation of additional monitoring wells within Buildings Nos. 20 and 25, groundwater sampling to evaluate the presence or absence of dense nonaqueous phase liquids (DNAPL), and collection of stream water and sediment samples. Varying concentrations of PCBs were detected in groundwater and sediment samples from the overburden and shallow bedrock well. No PCBs were detected in any deep bedrock monitoring wells. Field observations and analytical data indicated that no DNAPL had accumulated on the surface of the bedrock beneath the overburden.

The 1990 Earth Sciences Report concluded that the general flow of the overburden groundwater in this area is in a southeasterly direction towards Chartiers Creek. Groundwater flow through the shallow bedrock zone appears to be influenced by the relic stream channels, which transect the site. The shallow aquifer appears to be discharging to the relatively high permeability overburden aquifer in the area of these relic streams. However, historical data have not provided any indication of the relic stream channel acting as a conduit for PCB migration to other areas of the facility. Aroclor 1260 was detected at varying concentrations in localized areas of the southern portion of the facility ranging from less than 1 µg/l to 200 µg/l. No liquid hydrocarbons have been detected in groundwater samples from any of the deep bedrock monitoring wells. Low levels of volatile organic compounds (VOCs) have also been detected in localized areas of the southern portion of the facility. No point source of VOCs was identified. Additionally, the VOCs were detected in area that has not historically included manufacturing process or operations. Affected groundwater is vertically and horizontally limited in extent and available data do not indicate significant migration of contaminated groundwater from the affected area.

From 1989 to 1990 Earth Science Consultants evaluated the existing data and compiled additional information required to design a groundwater recovery system for remediation of groundwater contamination linked to the former Askarel Tank. A design proposal was made to PADER in late 1989. In February 1992, PADER and Cooper signed a Consent Order and Agreement (CO&A). This agreement bound Cooper to install and operate a groundwater recovery and treatment system in the 20/25 Building area (Photographs 4-8).

The collection system in Building 20/25 area consists of a 502-foot long groundwater interceptor trench located adjacent to the railroad tracks with three active recovery sumps which collects total fluids migrating within the soil from the Building 25 area towards Chartiers Creek. In addition, two modified recovery sumps collect total fluids from the soil beneath the Building 25. One modified soil recovery well collects total fluids from the soil beneath Building 25. One recovery point within the steam tunnel located beneath Building 25 serves to remove total fluids from the steam tunnel network. Three bedrock recovery wells with total depths constructed approximately into the upper 15 feet of bedrock and recovers total fluids present in the shallow bedrock. An underground conveyance system connects each recovery location with control and treatment system located in Building 90. This groundwater treatment system was later modified and used to treat groundwater collected from the Tank Farm Area in addition to the Askarel Tank Area. The purpose of both collection systems is to recover and control the downgradient migration of dissolved and free-phase petroleum, chlorinated organic hydrocarbons, and PCB compounds towards Chartiers Creek. The system will be operated until clean-up standards are met as defined in the CO&A. This phase did not involve any soil remediation.

Tank farm Area: Until October, 1992, Cooper maintained an oil tank farm (the "Tank Farm") at the facility in an area north of Buildings 65 and 84. The Tank Farm is elevated on a 30 to 40 foot high embarkment consisting of all fill material. A storm sewer, approximately 6 feet underground, channels the nearby unnamed tributary just south of the Tank Farm near the base of the fill material.

On December 1, 1973, McGraw-Edison experienced a transformer oil spill of approximately 9,000 gallons, of which all but 550 gallons was reported as recovered to the PADER. The spilled transformer oil did not contain PCB's. This spill originated from a ruptured 20, 000-gallon capacity oil tank located in the diked Tank Farm area. The dike was originally installed in August of 1971 and included a bentonite clay seal as oil spill prevention measure. A new tank was installed in late November of 1973.

When the foundations for the new tank were installed, the clay was penetrated and not re-established. As a result, when the oil storage tank ruptured, the oil was not retained. The oil leaked through the bottom of the diked area and into the fill on which the tank farm is built. The water table, at that time, was nearly the same level as the 72" concrete storm sewer located south of the diked area. The oil seeped through the joints of the sewer and was carried into Chartiers Creek by the constant flow of water in the storm sewer.

An indication of a potential contamination at the facility was observed during August 1990 when elevated concentrations of both oil and grease and PCBs were detected in water discharging from the 72-inch storm sewer located on-site. Further investigation revealed that a black oil-like substance was seeping into the storm sewer along the joints. In response to this discovery, Cooper personnel excavated a trench adjacent to the storm sewer and installed a 24-inch corrugated metal vertical sump with a wicking-type skimmer recovery system to collect the floating product as it accumulated in the sump. This section of the 72-inch storm sewer was slip-lined with an inner pipe and grouted to prevent seepage of oil and contaminated groundwater into the pipe.

Earth Sciences Consultants, Inc. (ESC) was contracted by Cooper Industries to further investigate the source and extent of the contamination observed at the site. ESC completed both a Phase I and Phase II Investigation of the Tank Farm Area to determine the source and vertical and horizontal extent of contamination. During these investigations, ESC completed a site reconnaissance and completed 18 soil borings to characterize soil conditions at depth. Ten of these soil borings were completed as piezometers and one was completed as a pumping well. The results of water and soil sampling completed by ESC showed that petroleum hydrocarbons were present in one or more samples collected from eleven of the twelve borings sampled. Furthermore, free product was observed in three piezometers and three borings, which were later abandoned. Free product was also observed in two existing wells and an existing recovery sump.

Results of soil analyses indicated that, at most locations, maximum total petroleum hydrocarbons (TPH) concentrations were generally observed in the fill material at depths ranging from 24 feet to 32 feet below ground surface (bgs). TPH concentrations within this depth interval ranged from non detect to 21,000 ppm. These depths are fairly consistent with observed depth to the water table and its range of fluctuation. A light non-aqueous phase liquid (LNAPL) as thick as 3.75 feet was observed floating on the groundwater table. The source of PCBs in the subsurface remains unknown. From 1967 until at least 1980, McGraw Edison repaired transformers at the facility, some of which contained oil contaminated with PCBs. Such oil had been handled and stored at the Tank Farm.

On June 15, 1993, a CO&A between Cooper Industries, Inc. and PADER was completed to address historical PCB contamination in the groundwater in the tank farm area. This agreement also addressed the exceedence of Cooper's NPDES permit effluent limitations for PCB-1260 to Chartiers Creek. Earth Sciences Consultants, Inc. was retained by Cooper Industries to implement a Phase III Groundwater Cleanup Plan (GCP) for the Tank Farm Area to comply with the requirements of the CO&A. Earth Sciences implemented the GCP activities during June through August 1993.

The collection system at Tank Farm Area consists of 4-inch diameter 650-foot long slightly inclined horizontal groundwater total fluids recovery well installed in the vicinity of the former tank farm area. A fluid conveyance system conveys the recovered well fluids to the treatment plant located in Building 90.

The treatment system consists of equipment to separate free-phase floating product from the recovered groundwater and to remove any VOCs or PCBs or oil and grease which may be present in the recovered groundwater to below established National Pollutant Discharge Elimination System (NPDES) permit limits. The treatment equipment consists of an equalization tank, an oil/water separator, a batch tank to hold water from the oil/water separator, a product drum for the separated free-phase product, an air powered transfer pump, and a multi-filter/multi-stage sediment filtration system to remove emulsified oils and sediment larger than one micron from the water. Three ozone injection units are utilized to control microbial growth. The groundwater recovery system is designed to produce an average daily flow of 1,600 gpd. Spent carbon is regenerated or disposed per a vendor agreement. Effluent from the treatment plant is discharged through a 2-inch pipeline that is routed through a 48-inch pipe that terminates at Chartiers Creek at Outfall 001. Sludge that accumulates in surge tank is drawn from the tank bottom by an air-driven diaphragm pump. Water from filtration operation is returned to head of the surge tank for reprocessing.

Cooper also maintains and operates a separate storm water treatment system inside Building 25 (Photographs 1 and 2). This treatment plant is used to treat storm water separately from the groundwater. This treatment system consists of a collection tank, which is also used to settle particulates and skim floating oil followed by sand filters to remove fine particulates followed by activated carbon filters to remove PCBs and any other organic contaminants. This treatment system was installed in late-1980s to prevent discharge of contaminants seeping into the sewer lines to the creek. Cooper disposes of sediments and spent carbon generated in this treatment plant off site.

Underground Storage Tank: On January 28, 1994, a 1,000 gallon underground steel tank was uncovered, removed and transported to United Environmental Group Inc's. (U.E.G) tank processing facility in Sewickley, Pennsylvania. The tank was used to store gasoline. The date of installation of the tank is unknown. The tank had approximately 80 gallons of liquid prior to removal. The liquids were pumped into a tank trailer and hauled to U.E.G's facility for proper disposal. Visual inspection of the excavated tank indicated that there were no holes or corrosion pits present in the tank. Once the tank arrived at U.E.G's tank processing facility, it was carefully unloaded, cleaned out, cut up and disposed of as scrap. The piping was also disposed of as scrap. All fluids used to clean the interior of the tank was contained and processed at U.E.G's wastewater processing facility. Groundwater was encountered below the tank at a depth of 7 feet, just below the tank. A total of five (one water sample and four soil samples) confirmatory samples were taken from the gasoline tankfield area to characterize the existing soil and water. All soil samples fell within the PADER Cleanup Standards for contaminated soils, however one water sample taken from the excavation pit detected Total Petroleum Hydrocarbons (PHC), Benzene, Toluene, Ethylbenzene, o-Xylenes and m, p-Xylenes. Soil and gravel surrounding the tank was used to backfill the excavation. On February 11, 1994 soil and gravel was again removed from the excavation. Water present in the excavation (342 gallons) was pumped out and allowed to regenerate. One additional water sample was taken from the tankfield area to characterize the existing water. This water sample fell within the acceptable cleanup standards and no additional soil samples were taken. Prior to backfilling, one monitoring well was installed in the center of the excavation. Soil and gravel from the excavation area and clean fill material were used as backfill and compacted. All available documentation that is related to this underground tank removal is included in Appendix B.

Non PCB Drum Storage Area: A less than 90-day drum storage area is located inside Building 56. This area is used to store miscellaneous hazardous waste generated at the facility such as part cleaning solvent

solutions (isopropyl alcohol) and paint related waste (filters and waste paint). Waste drums are disposed of off site at a licensed off site facility.

PCB Waste Storage Area: PCB related waste is stored in 55-gallon drums in a separate less than 90 day storage area in Building 57. A satellite PCB waste area is located near the groundwater treatment plant. This waste consists of waste oil from the oil water separator, used filter bags, used rags and spent activated carbon. Waste in this area is disposed off site at a licensed off site facility.

PAST HAZARDOUS MATERIAL RELEASES

In addition to the two major spills associated with the former Askarel tank and the oil spill in the tank farm area as described in the previous section of this report, there have been several other minor spills reported at the facility.

In 1980, there were two minor spills. The first spill occurred when a capacitor containing PCBs on the roof of Building 48 ruptured. EPA was onsite to investigate the incident. McGraw-Edison maintenance personnel collected all of the liquid waste and wiped down all structural members and rooftop. This clean up was completed the afternoon of the spill. All waste materials were collected and stored in the PCB storage area, including the ruptured capacitor.

The second spill occurred due to a capacitor failure in the Building 48 capacitor bank. A partially opened switch arced and started minor burning of the paint of the structural work. The capacitor ruptured at the top of the switch area, leaking a small amount of PCBs onto the framework. EPA was notified immediately and cleanup was implemented.

On the afternoon of July 24, 1991, contractors working on the removal of capacitors from Building 48 discovered that some oil had dripped from one of the capacitors. While removing a capacitor, the bushing/insulator was bumped on the metal bracing holding the capacitors and cracked, thereby letting a small amount of PCB oil drip on the metal bracing and onto the side of two other capacitors. It was estimated that no more than two fluid ounces of oil was exposed. The capacitor was placed on top of drip pads and then put into a 55-gallon drum. The broken capacitor, "dripped-on" capacitors and metal bracing were thoroughly cleaned with hexane to remove all PCB oil. All rags and drip pads were placed in a 55-gallon drum where they remained until proper disposal was arranged.

0n the afternoon of July 25, 1991, contractors working on the removal of capacitors from Building 48 roof located a capacitor that had a small hole at the top of the bushing. This was spotted when the capacitor was transferred to the ground on a pallet. A small amount of PCB oil dripped on the pallet and on asphalt. It was estimated that no more than 1.5 fluid ounces of oil was exposed. The leaking capacitor was placed in the 55-gallon drum containing the leaking capacitor from July 24 1991. The boards of the pallet that was exposed to PCB oil were placed in the debris accumulation drum from July 24, 1991. The materials used for clean up were also placed in the accumulation drum.

On July 26, 199, contractors working on the removal of capacitors from Building 48 roof found a capacitor that had a cracked bushing. No oil was exposed, but the capacitor was placed in the drum with the two capacitors from July 24 1991 and July 25, 1991 to avoid any potential exposure.

On July 29 1991 contractors working on the removal of capacitors from Building 48 roof found a capacitor that had been leaking while banded on a pallet on the ground. The capacitor was placed in a 55-gallon drum. The pallet, which was contaminated with PCB oil, was broken up and placed in a 55-gallon drum. A small section of asphalt was also contaminated with PCB oil. At first attempts were made to clean the asphalt with hexane, but it was decided that removing the asphalt would be more thorough clean-up method. The removed asphalt was placed in a 55-gallon drum. Approximately 20-sq. ft. of asphalt was removed. It was estimated that 8 fluid ounces of PCB oil was exposed. This did not represent a reportable quantity (1 lb).

On July 30 1991 two leaking capacitors were found while transferring pallets of capacitors to the storage area. These capacitors were put into the drum containing the capacitor from July 29 1991. Approximately 2 fluid ounces of PCB oil was exposed. The asphalt was thoroughly cleaned with hexane. All debris was placed in a 55-gallon drum.

C. Description of exposure pathways for all releases or potential releases.

Air: Nearest residence is approximately 100 feet away on west side of the facility. Surrounding community could be affected by air contamination if there is any.

Groundwater: PCBs have been detected in the overburden and shallow bedrock groundwater in localized areas of the southern portion of the facility. Source of the PCBs in groundwater is linked to historical spills and leaks from the former Askarel Tank outside Building 20. Low levels of VOCs have also been detected in localized areas of the southern portion of the facility. The source of the VOCs is unknown. The available data do not indicate significant migration of contaminated groundwater from the affected area. The Facility and the surrounding community are supplied by public water supply.

Surface Water: Chartiers Creek is located adjacent to the eastern boundary of the facility where it flows in a generally northerly direction with discharge to the Ohio River at McKees Rocks, Pennsylvania, which is used for fishing and recreational purposes. An unnamed tributary to Chartiers Creek crosses the northern boundary of the facility and flows in a generally eastwardly direction across the facility until it joins Chartiers Creek. This unnamed tributary is channeled through a subsurface concrete tile which acts as a kind of storm sewer system in the tank farm area. Oil and grease and PCBs found in stormwater discharge in the past have been linked to a historical tank rupture incident traced back to 1973. The facility discharges treated groundwater and stormwater to the creek through a permitted outfall. This discharge is sampled on a regular basis to insure compliance with this permit.

Soil: A fence surrounds the facility, which would prevent unauthorized access to the facility. However, facility employees have direct access to any potential soil contamination at the facility.

D. Exposure pathway controls and/or releases controls instituted at the facility.

Air: The facility holds miscellaneous air permits and has adequate air pollution control equipment. In January 1978, McGraw-Edison implemented a PADER approved closure plan to address soil

contamination that resulted from historic spills and leaks associated with the Askarel tank. The closure plan included an asphalt cap. The cap was designed to entomb the contaminated soil in approximately 4,200-sq. ft. area over former Askarel tank area. The soil beneath the asphalt was stabilized to depth of 10 inches to form a base for the pavement cover without removing any contaminated soil. Asphalt cap has eliminated exposure of contaminated soil to air and thereby contaminant migration through air pathway. No exposure of PCBs or VOCs through air is expected. The cap was found to be in fair condition during the inspection. Some cracks were observed.

Groundwater: Groundwater contaminated with PCBs, VOCs, oil and grease are recovered and treated at the facility. The groundwater treatment system consists of two groundwater collection systems (one in the southwestern and one in the northern portion of the facility combined) and another system to treat contaminated storm water. All treated groundwater is discharged to Chartiers Creek. Cooper retained the responsibility to operate the groundwater recovery and treatment system until the year 2001. The system will be operated until clean-up standards are met as defined in the 1992 CO&A with PADER.

Surface Water: The PATT facility is located along the Chartiers Creek. Contaminated groundwater discharge to the creek is controlled by a groundwater recovery and treatment system. In January 1978, McGraw-Edison implemented a PADER approved closure plan to address soil and groundwater contamination. The closure plan included the installation of a 185 ft long and 5 ft deep subsurface concrete barrier wall on the west side of the facility to prevent possible leakage into the Chartiers Creek. A stormwater treatment system is also in operation at present, which controls contaminated runoff to the creek. The facility discharges treated groundwater and stormwater to the creek. These discharges are controlled and regulated under a NPDES permit.

Soil: A fence surrounds the facility thus preventing unauthorized access to the facility. Facility workers have access to the contaminated area in southern portion of the facility. In January 1978, McGraw-Edison implemented a PADER approved closure plan to address soil contamination that resulted from historic spills and leaks associated with the Askarel tank. The closure plan included an asphalt cap. The cap was designed to entomb the contaminated soil in approximately 4,200-sq. ft. area of former Askarel tank.

Observations made during visual inspection

EPA or state permitted activities

Permits and Regulatory Action History: No known solid waste permits have been issued for this site.

Areas requiring periodic inspection

Groundwater Recovery and Treatment System: Groundwater treatment system needs regular monitoring and maintenance. Cooper retained the responsibility to operate and maintain the groundwater collection and treatment system until the end of 2001. This system is operated and maintained 4 hours/day by Earth Sciences Consultants for Cooper.

Stormwater Collection and Treatment System: Stormwater treatment system is routinely monitored and maintained by Earth Sciences Consultants for Cooper.

Non PCB Drum Storage Area: This drum storage area is routinely inspected. Hazardous waste was properly labeled and containerized.

PCB Waste Storage Area: PATT personnel routinely inspect this drum storage area. Hazardous waste was properly labeled and containerized.

Above ground Storage Tanks: The aboveground tanks have adequate containment structures and are inspected routinely.

F. Follow-up action items

None identified at this time