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COOPER INDUSTRIES

Robert W. Teets
Director
Risk Management
and Environmental Affairs

December 6, 1989

Frank Vavra
Osborne Superfund Site Project Manager
U.S. Environmental Protection Agency
841 Chestnut Street
Philadelphia, PA 19107

Re: Request for Information
November 16, 1989

Dear Mr. Vavra:

This is Cooper Industries' response to the information request dated November 16, 1989, from Abraham Ferdas relating to the Osborne Landfill CERCLA site in Grove City, Pennsylvania ("the Osborne site"). The date by which Mr. Ferdas' letter asked that this information be submitted was November 30, 1989, (ten days after Cooper Industries received the letter). That due date was extended to December 7, 1989, by agreement between you and our counsel, Jeffrey Cerar.

In response to your information request, we have conducted another investigation, having conducted an investigation in 1983 when a similar request was received regarding the Osborne site. We are enclosing the following documents that contain information which may lead to a conclusion that listed hazardous wastes were transported to, treated, stored or disposed of by Cooper Industries at the Osborne site:

1. Handwritten notes, "Meeting 11/4/82"
2. Letter, R. Davis to F. Kocovar, 11/18/67
3. Letter, R. Davis to N. Straub, 1/23/73
4. Memo, R. Davis to D. Winship, 6/14/83
5. Cooper Energy Services "Meeting Notes" 11/8/82
6. Handwritten note, R. Davis to D. Seikkonen, 3/23/67

In response to the specific questions on page two of your November 16, 1989, information request, Cooper Industries provides the following information:

1. In a letter dated January 23, 1973, from Rudy L. Davis to Norman Straub, P.E., a copy of which Cooper Industries supplied to the U.S. Environmental Protection Agency on November 8, 1983, it was stated that 35 gallons per day of waste solvents were disposed of at the Osborne site, referred to in that letter as "the landfill area of the Jim Osborne farm". That letter also stated that "Liquid wastes go into a sump hole in the field behind the landfill for drying and the solids collected are handled as necessary after drying is completed".

In an effort to obtain further clarification, we interviewed Rudy L. Davis, the author of the January 23, 1973, letter quoted above. Mr. Davis, who retired from Cooper Industries in 1986, was first employed by Cooper Industries in 1957. He came to the plant in Grove City in 1966. He was Plant Engineer in 1967 and became Facilities Engineer in 1978.

Mr. Davis stated that the "sump" referred to in his January 23, 1973, letter was not a permanent single location. Rather, this statement referred to the practice for neutralizing and disposing of waste acid from the tin plate and chrome plate operations. When these liquid wastes were taken out to the Osborne site, a pit would be dug within the landfill, the waste acids poured in the pit, and solid carbide wastes, a lime material, poured on top to dry and neutralize the acid. Once dry, the material would be covered over as the remainder of the landfill.

Mr. Davis said that he was not aware of any sump that was permanent in nature. Nor was he aware that this practice ever occurred outside the landfill area at the Osborne site. Nor was he aware that solvents were ever poured into sumps at the site. It should be noted that Mr. Davis' letter did not say that solvents were so managed.

The carbide waste used for neutralization of the acids was spent nuggets of carbide. Carbide nuggets were used to generate acetylene, which was given off when water was metered onto these nuggets. It was a gray lime-like solid that, after neutralization of the waste acids, left a white residue.

2. The electroplating wastes referred to in Mr. Davis' letter were the spent baths from tin plating and chrome plating operations. Cyanide was not used in the chrome plating operation. Nor was there any wastewater treatment sludge from any of the chrome plating operations, according to Mr. Davis. The electroplating wastes were not still bottoms. This understanding is based on Mr. Davis' statements, and on the recollection of current employees at Cooper Industries.

Mr. Davis stated that the waste solvents referred to in the January 23, 1973, letter consisted principally of the solid sludge from the trichloroethylene degreaser tank. Mr. Davis stated that, although it was not Cooper Industries' practice to send spent trichloroethylene solvent to the Osborne site, it was likely that the sludge from the tank contained liquid trichloroethylene. The solution used in the degreaser operation was greater than a ten percent (10%) solution of trichloroethylene, according to Mr. Davis.

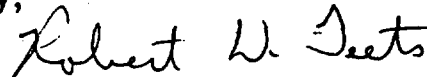
Mr. Davis stated that the other solvent that was occasionally sent to the Osborne site was spent "Stoddard Solvent", also known as "Sunoco Spirits". This material is mineral spirits, and is not a chlorinated solvent. "Kleer-Flo Cleaning Fluid" mentioned in one of the enclosed documents appears from our investigation to have contained mineral spirits and no ingredients that would make it a listed waste.

Based on discussions with current plant and division personnel, we have determined that the Grove City facility currently generates one hazardous waste stream, the cleanout of the 1,1,1-trichloroethane degreaser tank. This waste stream is currently manifested and shipped on a periodic basis to Waste Management Material Control (WMMC) of Pittsburgh. WMMC characterizes the waste and disposes of it at an appropriate facility. WMMC assigns this waste the hazardous waste codes F001, F003, and F005.

We have discussed above the prior handling of trichloroethylene wastes. The Grove City facility no longer uses this degreasing solvent, having switched to 1,1,1-trichloroethane in 1982.

The enclosed information was obtained at my direction and is the result of a diligent attempt to respond fully to your information request of November 16, 1989. Cooper Industries does not claim confidentiality for the enclosed documents, and you may disregard the indications of confidentiality on those documents.

Sincerely,



Robert W. Teets

RWT/os/u:ja

Attachments

cc: Jeffrey Cerar, Esq.
Bruce Stolba
C.J. Plesnicher