

✓ C.R. C... 5/28/88

PA-1243



Bureau of Waste Management

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
Post Office Box 2063
Harrisburg, Pennsylvania 17120



SDMS DocID 2096357

Preliminary Assessment

FOR

CHEM-FAB CORPORATION

DOYLESTOWN BOROUGH
BUCKS COUNTY
PENNSYLVANIA

Preliminary Assessment - Chem-Fab Corporation PA-1243

Chem-Fab is an electroforming and etching operation which has had a history of pollution incidents dating to at least 1967. The site is located in the borough of Doylestown, Bucks County, Pennsylvania at 300 N. Broad Street.

In addition to the present operation, the company also electroplated until approximately 1978. Trichloroethylene (TCE) was used for degreasing until 1973. Wastes currently generated include ferric chloride, mineral spirits, and sludge from treatment of chromic acid rinse water. Materials used in the etching processes or for waste treatment include concentrated chromic acid, sulfuric acid, sodium bisulfate, sodium hydroxide, and lime.

A joint inspection was conducted at Chem-Fab by this writer and Peter Noll, Bucks County Health Department, in May 1982. No imminent environmental hazards were noted. Waste treatment and storage tanks were on a concrete pad surrounded by a block and concrete dike four feet high. However, Chem-Fab was apparently storing sludge beyond ninety (90) days without RCRA interim status. Shortly thereafter, the company president, Mr. Becker, was charged by Pennsylvania DER with hauling chrome waste from the Chem-Fab plant and disposing it in the sanitary sewer system via the plumbing in his residence in Upper Merion Township, Montgomery County.

Previous problems included several incidences of chrome wastes seeping from the Chem-Fab parking lot into a drainage ditch along Broad Street and into Cook's Run, and a December 1971 spill which also reached Cook's Run. The seepage problems were apparently the result of leaking underground waste storage tanks, which were removed in April 1967 by the company. Waste continued to surface for several years, however. The attached inspection reports and correspondence outline these problems in more detail.

The site is in close proximity (approximately 1500 feet) to a Doylestown Borough public water supply well (locations on map). Runoff from the site leads to Cook's Run, approximately 1500 feet away. This stream is a tributary to Neshaminy Creek. Some nearby residences just outside the borough line might have private water supplies.

Contamination of several borough wells with TCE has been observed. Based on its history, Chem-Fab could be contributing to this contamination.

A site inspection is recommended to determine whether off site migration of contaminants is continuing.

ORIGINAL
(Red)

		POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT PART 1 - SITE INFORMATION AND ASSESSMENT		I. IDENTIFICATION	
		01 STATE PA	02 SITE NUMBER 1243		
II. SITE NAME AND LOCATION					
01 SITE NAME (Legal, common, or descriptive name of site) Chem-Fab Corporation		02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER 300 N. Broad Street			
03 CITY Doylestown		04 STATE PA	05 ZIP CODE 18901	06 COUNTY Bucks	07 COUNTY CODE 08 CONG DIST
09 COORDINATES LATITUDE 40° 18' 54" N LONGITUDE 75° 8' 6" W					
10 DIRECTIONS TO SITE (Starting from nearest public road) See Topo Map					
III. RESPONSIBLE PARTIES					
01 OWNER (if known) H. R. Becker		02 STREET (Business, mailing, residential) Same as Above			
03 CITY		04 STATE	05 ZIP CODE	06 TELEPHONE NUMBER (215) 345-6789	
07 OPERATOR (if known and different from owner)		08 STREET (Business, mailing, residential)			
09 CITY		10 STATE	11 ZIP CODE	12 TELEPHONE NUMBER ()	
13 TYPE OF OWNERSHIP (Check one) ☒ A. PRIVATE ☐ B. FEDERAL: _____ (Agency name) ☐ C. STATE ☐ D. COUNTY ☐ E. MUNICIPAL ☐ F. OTHER: _____ (Specify) ☐ G. UNKNOWN					
14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply) ☒ A. RCRA 3001 DATE RECEIVED: ____/____/____ MONTH DAY YEAR ☐ B. UNCONTROLLED WASTE SITE (CERCLA 103 G) DATE RECEIVED: ____/____/____ MONTH DAY YEAR ☐ C. NONE					
IV. CHARACTERIZATION OF POTENTIAL HAZARD					
01 ON SITE INSPECTION ☒ YES DATE 05 / 27 / 82 MONTH DAY YEAR ☐ NO		BY (Check all that apply) ☐ A. EPA ☐ B. EPA CONTRACTOR ☒ C. STATE ☐ D. OTHER CONTRACTOR ☒ E. LOCAL HEALTH OFFICIAL ☐ F. OTHER: _____ (Specify) CONTRACTOR NAME(S): _____			
02 SITE STATUS (Check one) ☒ A. ACTIVE ☐ B. INACTIVE ☐ C. UNKNOWN		03 YEARS OF OPERATION 1965 Present ☐ UNKNOWN BEGINNING YEAR ENDING YEAR			
04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED Spill residues from plant operations including TCE, Chromium, Caustics, and electroplating wastes.					
05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION Contamination of surface and ground water.					
V. PRIORITY ASSESSMENT					
01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents) ☐ A. HIGH (Inspection required promptly) ☒ B. MEDIUM (Inspection required) ☐ C. LOW (Inspect on time available basis) ☐ D. NONE (No further action needed, complete current disposition form)					
VI. INFORMATION AVAILABLE FROM					
01 CONTACT Robert Allen		02 OF (Agency/Organization) PADER		03 TELEPHONE NUMBER ()	
04 PERSON RESPONSIBLE FOR ASSESSMENT Same as Above		05 AGENCY	06 ORGANIZATION	07 TELEPHONE NUMBER (215) 565-1687	08 DATE 01 / 23 / 86 MONTH DAY YEAR



POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT PART 2 - WASTE INFORMATION

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
PA	1243

II. WASTE STATES, QUANTITIES, AND CHARACTERISTICS

01 PHYSICAL STATES <i>(Check all that apply)</i> ☐ A. SOLID ☐ B. POWDER, FINES ☒ C. SLUDGE ☐ D. OTHER _____ <i>(Specify)</i>	02 WASTE QUANTITY AT SITE <i>(Measure of waste quantities must be independent)</i> ☐ E. SLURRY ☒ F. LIQUID ☐ G. GAS TONS _____ CUBIC YARDS _____ NO. OF DRUMS _____	03 WASTE CHARACTERISTICS <i>(Check all that apply)</i> ☒ A. TOXIC ☒ B. CORROSIVE ☐ C. RADIOACTIVE ☐ D. PERSISTENT ☐ E. SOLUBLE ☐ F. INFECTIOUS ☐ G. FLAMMABLE ☐ H. IGNITABLE ☐ I. HIGHLY VOLATILE ☐ J. EXPLOSIVE ☐ K. REACTIVE ☐ L. INCOMPATIBLE ☐ M. NOT APPLICABLE
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III. WASTE TYPE

CATEGORY	SUBSTANCE NAME	01 GROSS AMOUNT	02 UNIT OF MEASURE	03 COMMENTS
SLU	SLUDGE			
OLW	OILY WASTE			
SOL	SOLVENTS			
PSD	PESTICIDES			
OCC	OTHER ORGANIC CHEMICALS			
IOC	INORGANIC CHEMICALS			
ACD	ACIDS			
BAS	BASES			
MES	HEAVY METALS			

IV. HAZARDOUS SUBSTANCES (See Appendix for most frequently cited CAS Numbers)

[illegible]

V. FEEDSTOCKS (See Appendix for CAS Numbers)

CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER	CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER
FDS			FDS		
FDS			FDS		
FDS			FDS		
FDS			FDS		

VI. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, reports.)

State Files
Bucks Co. Health Dept. Files

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE 02 SITE NUMBER
PA 1243

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☒ A. GROUNDWATER CONTAMINATION 02 ☐ OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: > 1000 04 NARRATIVE DESCRIPTION

01 ☒ B. SURFACE WATER CONTAMINATION 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

04/24/67 - Seepage from parking lot discharged to Cooks Run - High Chromium
12/03/71 - Chromic Acid rinsewater spill discharged to Cooks Run

01 ☐ C. CONTAMINATION OF AIR 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

01 ☐ D. FIRE/EXPLOSIVE CONDITIONS 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

01 ☐ E. DIRECT CONTACT 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

01 ☒ F. CONTAMINATION OF SOIL 02 ☒ OBSERVED (DATE: 04/24/67) ☐ POTENTIAL ☐ ALLEGED
03 AREA POTENTIALLY AFFECTED: 1-2 04 NARRATIVE DESCRIPTION
(Acres)

Seepage from parking lot (underground tanks)

01 ☒ G. DRINKING WATER CONTAMINATION 02 ☐ OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: > 1000 04 NARRATIVE DESCRIPTION

01 ☐ H. WORKER EXPOSURE/INJURY 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 WORKERS POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

01 ☐ I. POPULATION EXPOSURE/INJURY 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

 POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS		I. IDENTIFICATION	
		01 STATE PA	02 SITE NUMBER 1243
II. HAZARDOUS CONDITIONS AND INCIDENTS <i>(Continued)</i>			
01 ☐ J. DAMAGE TO FLORA 04 NARRATIVE DESCRIPTION		02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED	
01 ☒ K. DAMAGE TO FAUNA 04 NARRATIVE DESCRIPTION <i>(Include names of species)</i>		02 ☐ OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED	
Contamination of Cooks Run could result in fish kill.			
01 ☐ L. CONTAMINATION OF FOOD CHAIN 04 NARRATIVE DESCRIPTION		02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED	
01 ☐ M. UNSTABLE CONTAINMENT OF WASTES <i>(Spills/runoff/standing liquids/leaking drums)</i> 03 POPULATION POTENTIALLY AFFECTED: _____		02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED 04 NARRATIVE DESCRIPTION	
01 ☐ N. DAMAGE TO OFFSITE PROPERTY 04 NARRATIVE DESCRIPTION		02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED	
01 ☐ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPs 04 NARRATIVE DESCRIPTION		02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED	
01 ☐ P. ILLEGAL/UNAUTHORIZED DUMPING 04 NARRATIVE DESCRIPTION		02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED	
05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS			
III. TOTAL POPULATION POTENTIALLY AFFECTED: <u>> 1000</u>			
IV. COMMENTS			
V. SOURCES OF INFORMATION <i>(Cite specific references, e. g., state files, sample analysis, reports)</i>			
DER Files and Inspections Bucks Co. Health Dept. Files			

FIELD TRIP SUMMARY REPORT

ORIGINAL
(Red)

This summary should be prepared in conjunction with the Preliminary Assessment, EPA Form 2070-12.

EPA Case Number PA-1243 Site Name Chem-Fab Corporation

Site Description Small electroforming and etching operation.	
Area of site (acres) Approx. 1/2 to 1 acre	Hazardous portion, if not entire site
Description of processes/operations which took place at the site Vapor Degreasing with TCE Electroplating Etching	
Waste handling/disposal practices Wastes were stored in underground tank which leaked, causing contamination. Wastes currently stored in tanks above ground. Storage area is paved and diked.	
Site topography and runoff drainage pathways Lot is paved - runoff to drainage ditch leading to Cooks Run.	
Surface or subsurface drainage areas (leachate) noted? None at present - see narrative	Odors/stains noted? Stressed vegetation noted?
Location and description of streams or receiving waters adjacent to site. Include flow direction and observations. Note location on attached map. Drainage ditch leads to Cooks Run (1500' away)	
Monitoring wells on site or in vicinity. Note location on attached map. Doylestown Borough Wells - see map.	

Population within 1/2 mile of site:

- ☐ 0-10
☐ 10-100
☒ greater than 100

Population within 1 mile of site:

- ☐ 0-10
☐ 10-100
☐ 100-1000
☒ greater than 1000

Surrounding land use (woodlot, agricultural, recreation, industrial, etc.)

NORTH

Industrial

EAST

Industrial/Commercial/Residential

SOUTH

Residential

WEST

Industrial

Municipal water supply within 3-mile radius (note use of surface water and/or wells)

Approx. 6 public wells

Reference: Bucks Co. Health Dept.

Domestic wells. Approximate number within 1/2 mile: Unknown

List nearest wells below and show locations on attached map.

Owner/Resident

Address

Phone

Groundwater flow direction, if known

Unknown

Description of odor/taste problems

None

State inspection activity (including permits held)

RCRA Inspection 05/27/82

State/Federal/Private remedial activities

06/67 - Leaking underground tanks removed.

Additional comments--Further description of site

See narrative and attachments.

SITE CONTACTS

Name and Title	Affiliation	Phone
H. R. Becker	President	(215) 343-0810

INSPECTION INFORMATION

Name and title of inspector(s) Robert Allen

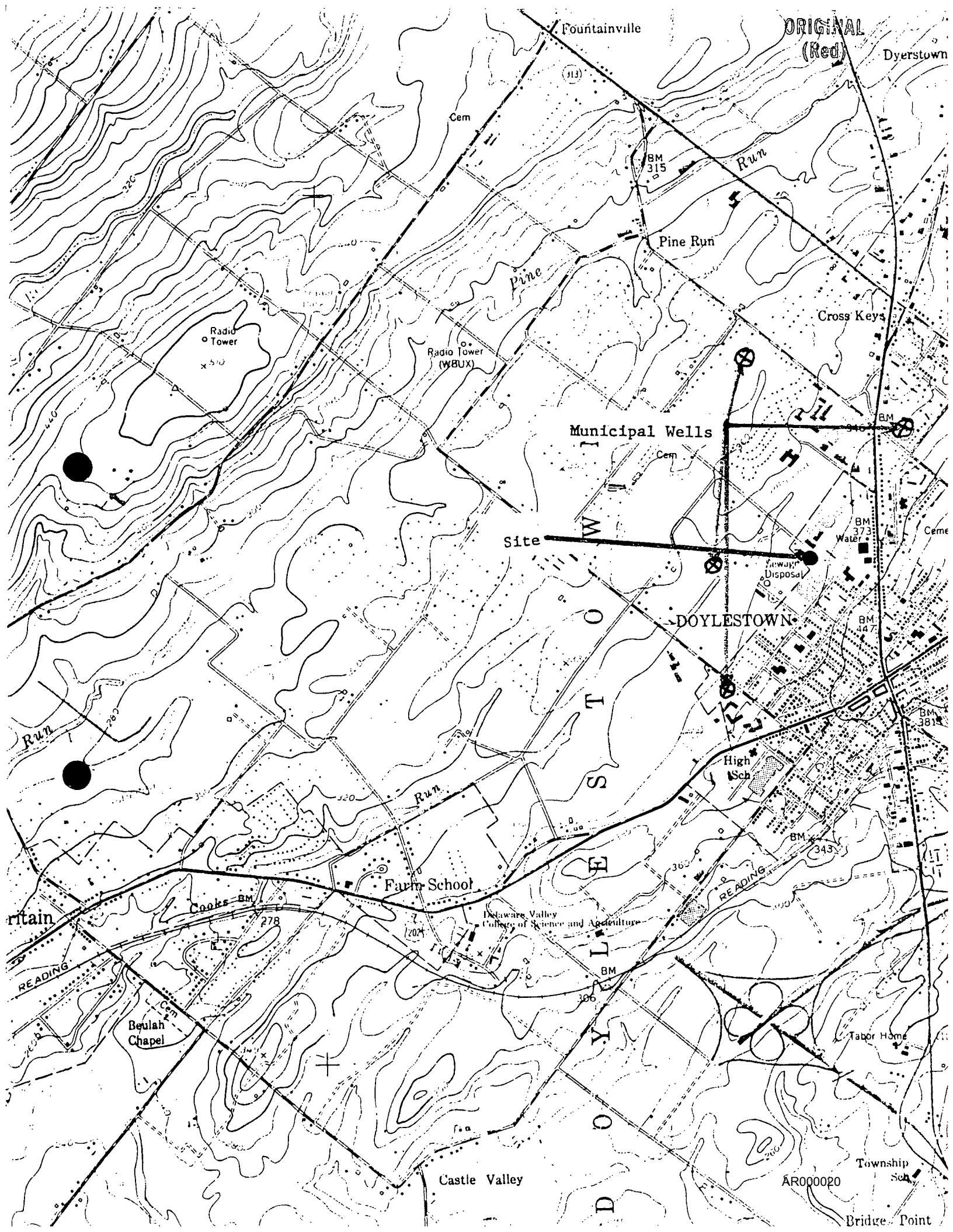
Agency PADER Phone number (215) 565-1687

Date 01/21/86 Time on site 2 Hrs.

Weather conditions:

ATTACHMENTS

- o Topographic map identifying site location. Include name of quadrangle map.
- o Site sketch map showing location of monitoring wells, domestic wells, municipal water supplies, and areas of concern (lagoons, leachate seeps, drums, etc.)
- o Any available sampling results or state monitoring data with map showing sample locations.



Fountainville

ORIGINAL
(Red)

Dyerstown

Cem

BM
315

Run

Pine Run

Pine

Cross Keys

Radio
Tower

Radio Tower
(WBUX)

Municipal Wells

Cem

Site

DOYLESTOWN

BM
373

Water

Disposal

BM
447

BM
381

High
Sch

BM
343

READING

Farm School

Delaware Valley
College of Science and Agriculture

Cooks - BM
278

Beulah
Chapel

ritain

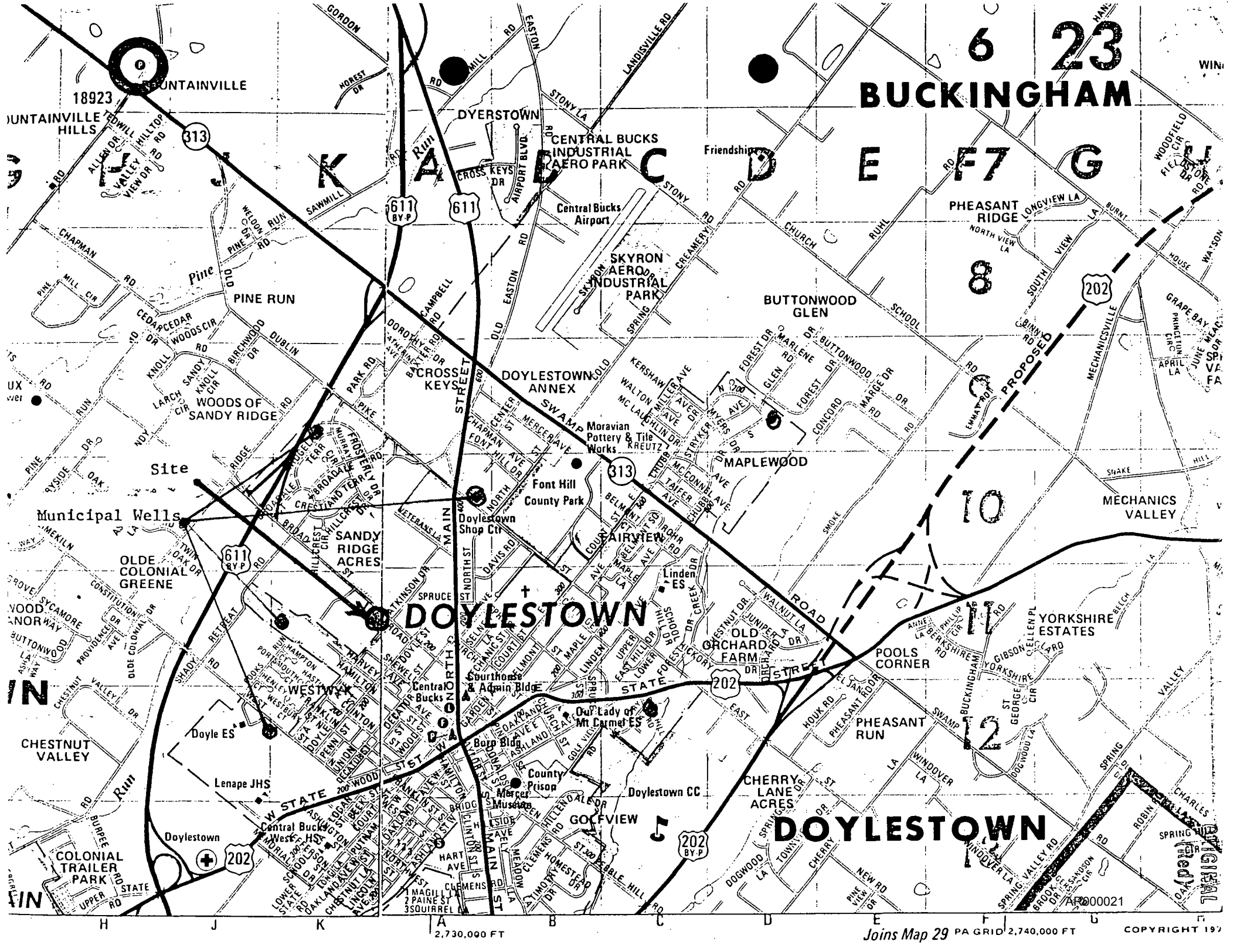
READING

Castle Valley

AR000020

Township
Sch

Bridge Point



BUCKINGHAM

DOYLESTOWN

DOYLESTOWN

2,730,000 FT

Joins Map 29 PA GRID 2,740,000 FT

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COUNTY OF BUCKS

DEPARTMENT OF HEALTH

Neshaminy Manor Center, Doylestown, Pa. 18901 - 215-343-2800

FIELD OFFICES

410 Bath Road, Bristol, Pa. 19007 - 788-0491

515 West End Blvd., County North Annex Bldg., Quakertown, Pa. 18951 - 536-6500

County Commissioners

ANDREW L. WARREN, *Chairman*
ELAINE P. ZETTICK
CARL F. FONASH

Edmund K. Lindemuth, M.D., M.P.H.
Director

Board of Health

Paul W. McIlvaine, M.D., *Chairman*
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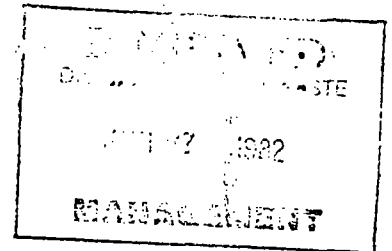
June 3, 1982

MEMORANDUM

TO: Walter E. Stanley, Jr., Chief
Operations Section
Norristown Regional Office - DER

FROM: Peter G. Noll *P.G.N.*
Division of Environmental Engineering

SUBJECT: Chem-Fab Corporation
Doylestown Borough, Bucks County



In accordance with your request, an inspection of this company was conducted with Rob Allen of your office on May 27, 1982. The Company President, Mr. H. Richard Becker, was interviewed (See attached inspection report).

The company ceased trichloroethylene vapor degreasing in 1973 and ceased electroplating over four years ago. The current etching operation, chemicals used, and waste generation are outlined below. All outside tanks are inside a block and concrete dike.

1. Metals are cleaned with water only. This is discharged to the sanitary sewer.
2. Metals are treated with photo sensitive lacquer and printed. No liquid wastes are generated.
3. Prints are developed with mineral spirits. Waste mineral spirits (50 gallons every two weeks) are mixed with number two fuel oil and used to heat the building.
4. Ferric Chloride is used to etch the prints. Waste ferric chloride is pumped to two outside tanks for recycling by the supplier, Gulbrandsen Co., Inc. (See attached invoice). He removes an amount of waste equal to the fresh solution delivered. Rinse water and any spillage is pumped to the waste treatment tank. The pH of the ferric chloride is two or less.

Memo to Walt Stanley
Re: Chem-Fab Corporation

Page 2

5. Chromic acid hot bath is an oxidizer used to clean the metals. Rinse water goes to the waste treatment tank. Mr. Becker indicates that while the chrome bath is added to and adjusted, he never has to change the bath or dispose of waste concentrate chrome solution.
6. All rinse waters are pumped to an outside holding tank. Sulfuric Acid is added to lower the pH. Sodium bisulfate is used to reduce the chrome to the trivalent state. Lime or Caustic raises the pH. After sludge settles, clean liquid is sampled then discharged to the sanitary sewer. One batch is treated daily (every other day when business is slow). Sludge is pumped to one of two 6,000 gallon holding tanks. Clear liquid is periodically discharged to the sanitary sewers.

Mr. Becker indicated to us that he had not removed sludge from the pretreatment tanks for a year, but that only one of the two 6,000 gallon tanks were full. He feels he has another year of holding capacity. He has a sludge centrifuge at the site but cannot presently afford to install it.

After our joint inspection, I phoned Mark Johnston, operator of the Harvey Avenue Sewage Treatment Plant, and Charles Ott, Supervisor of the Doylestown Borough Authority treatment plants. They feel there is a problem with metals in the digested sludge. The Borough has just enacted an industrial waste ordinance. They feel that certain industries, including Chem-Fab, will not be able to comply. Listed below is the February, 1982 analysis of the digested sludge done by the Borough's lab.

	<u>Parts per Million Dry Weight</u>	<u>Pounds per Dry Ton</u>
Potassium	2359.7	
Magnesium	4201.4	
Sodium	4877.3	
Calcium	31448.7	
Aluminum	7373.3	
Manganese	307.4	
Iron	21477.5	
Nickel	1222.0	2.44
Copper	3600.0	7.2
Zinc	2964.3	5.93
Cadmium	264.7	0.53
Lead	225.6	0.45
Chromium	672.8	1.35
Phosphate	22901.1	
Ammonia-Nitrogen	432.1	
Organic Nitrogen	46180.8	
Total Nitrogen	46612.9	
2.8% Solids		

PGN/rad
cc: Rob Allen

AR000023

HAZARDOUS WASTE INSPECTION REPORT
Generators - Part ADate of inspection 5-27-82 Time start 1000 Time finish 1100Name of inspector R. ALLENCompany, installation name CHEM-FAB CORP. INC.Location 300 N. BROAD ST. DOYLESTOWN 18901County BUCKS Municipality DOYLESTOWN BOROIdentification number PAD002323848Name of responsible official H. RICHARD BELKERTitle PRESIDENTMailing address SAMEArea code and phone no. 215-343-0810Name of person interviewed H. RICHARD BELKERTitle PRESIDENT

Mailing address (if different from above) _____

Area code and phone no. _____

1. Current waste handling method:

- a. ☒ On-site ☒ treatment, ☐ storage, ☐ disposal
- b. ☒ On-site ☐ use, ☐ reuse, ☒ recycle, ☐ reclaim
- c. ☒ Off-site ☐ treatment, ☐ storage, ☒ disposal
- d. ☐ Off-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim

2. Amount of hazardous waste produced:

a. ~ 1500 - 2000 kg./mo.

b. _____ kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number:

D007D0024. Are hazardous wastes transported off-site by the generator? ☐ Yes ☒ No

ORIGINAL
(Red)

[illegible]

AR000025

HAZARDOUS WASTE INSPECTION REPORT
Part C - Comments

ORIGINAL
(Red)

Date of inspection 5-27-82 Identification number PAD002323848
Company, Installation name CHEM-FAB CORP.
County BUCKS Municipality DOYLESTOWN BORO

WASTES ARE $FeCl_2$ SOLUTION + CR SLUDGE FROM ETCHING
OPERATION - $FeCl_2$ HAULED + RECLAIMED BY GULBRANDSEN -
CR SLUDGE IS HELD IN TANKS UNTIL SHIPMENT - LAST SHIPMENT
WAS 5-18-81 BY WARREN DISPOSAL SERVICE (NOW DEFUNCT).

VIOLATIONS:

- 1) THE SHIPMENT BY WARREN DISPOSAL SHOULD HAVE BEEN
MANIFESTED AS PER SEC. 75.262(e) - THERE IS NO RECORD
OF THE DISPOSAL SITE FOR THIS MATERIAL - NO AUTHO-
RIZATION FROM ANY APPROVED TSD FACILITY.
- 2) WASTE CAN NOT BE ACCUMULATED ON SITE > 90 DAYS
SINCE CHEM-FAB DOESN'T ^{HAVE} INTERIM STATUS AS STORAGE
FACILITY.
- 3) NO QUARTERLY REPORTS SUBMITTED AS PER 75.262(i).
- 4) NO CONTINGENCY PLAN FOR SPILLS + OTHER EMERGENCIES
AS PER 75.262(m)(5).

This inspection report is official notification that a representative of the Department of
Environmental Resources, Bureau of Solid Waste Management, inspected the above installation.
The findings of this inspection are shown in this report. Any violations which were uncovered
during the inspection are indicated. Violations may also be discovered upon examination of the
results of laboratory analyses and review of Department records. Notification will be forth-
coming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) MAILED TO H.R. BECKER Date _____
Inspector (signature) Robert A. De Date 6-24-82

BP
CRed
La

BUCKS COUNTY DEPARTMENT OF HEALTH

Board of Health

John L. Jacoby, Chairman
John L. Stover, Jr., Vice Chairman
Mrs. Charles Benhayon
Paul W. McIlvaine, M.D.
Walter R. Tice, M.D.

Administrative Offices

Neshaminy Manor Center
Doylestown, Pennsylvania 18901
343-2800

Field Offices

143 South 11th Street
Quakertown, Pennsylvania 18951
536-6500

410 Bath Road
Bristol, Pennsylvania 19007
788-0491

Neshaminy Manor Center
Doylestown, Pennsylvania 18901
343-2800

Director

Edmund K. Lindemuth, M.D., M.P.H.



December 6, 1971

CERTIFIED MAIL

Mr. H. R. Becker, General Manager
Chem-Fab Corporation
300 North Broad Street
Doylestown, Pennsylvania 18901

Subject: Violation Notice

Industrial Waste Discharge to Cooks Runs
Chem-Fab Corporation
Doylestown Borough, Bucks County

Dear Mr. Becker:

In response to a stream pollution complaint, an inspection of the subject industry was conducted on December 3, 1971, by C. Barry Passmore, Environmental Protection Specialist with this Department. It was learned that industrial wastes had been discharged into the waters of the Commonwealth. We understand that the discharge occurred as a result of a broken valve on a drawoff line from a tank which is used to pretreat industrial waste prior to discharge to the public sewer system. The Chem-Fab Corporation did not notify the Department of the discharge.

This is to notify you that the discharge of industrial wastes into the waters of the Commonwealth as described above is a violation of the Clean Streams Law, the Act of June 22, 1937, P.L. 1987, as amended and Chapter 101 of the State's Rules and Regulations concerning incidents causing or threatening pollution.

Accordingly, immediate steps must be taken to prevent a recurrence of this violation. We expect a clear-cut statement from you within seven (7) days from receipt of this letter setting forth the methods taken to eliminate future discharges, and procedures established to comply with Chapter 101 Para. 101.2 (a) and (b) (copy enclosed).

BUCKS COUNTY DEPARTMENT OF HEALTH

Board of Health

John L. Jacoby, Chairman
John L. Stover, Jr., Vice Chairman
Mrs. Charles Benbayon
Paul W. McIlvaine, M.D.
Walter R. Tice, M.D.

Administrative Offices

Neshaminy Manor Center
Doylestown, Pennsylvania 18901
343-2800

Field Offices

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Neshaminy Manor Center
Doylestown, Pennsylvania 18901
343-2800

Director

Edmund K. Lindemuth, M.D., M.P.H.



December 28, 1971

MEMORANDUM

TO: C. T. Beechwood
Regional Sanitary Engineer

FROM: Albert W. Wills, Chief
Division of Sanitary Engineering

SUBJECT: Request for Legal Action
Industrial Waste Pollution
Chem-Fab Corporation
Doylestown Borough, Bucks County, Pa.

On December 3, 1971, C. Barry Passmore, Environmental Protection Specialist with this Department, investigated and confirmed that approximately 500 gallons of chromic acid rinse waste water from the subject company had spilled into the waters of the Commonwealth. The spill occurred as a result of a broken valve on a pre-treatment tank, and was initially reported to us by the State Department of Transportation. Samples of the spill and creek were collected with the results as follows:

	<u>Cooks Run Upstream</u>	<u>Spill on Driveway</u>	<u>Ditch to Cooks Run</u>	<u>Cooks Run Below Ditch</u>
pH	6.4	2.8	3.3	5.3
Alkalinity	60 mg/l	0	0	20 mg/l
pH ₈	0	4120	1670	66
Total Solids	160 mg/l	14,950 mg/l	7500 mg/l	1420 mg/l
Cr (Hex.)	none	1100 mg/l	600 mg/l	15 mg/l
Cr. (Total)	0.03 mg/l	3000 mg/l	1200 mg/l	55 mg/l
pH ₄		1280	130	

As can be seen, the spill caused severe degradation of the water quality in Cooks Run.

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF HEALTH
SANITARY ENGINEERING

INSPECTION
DATE 12-3-71
FROM 145 A.M. TO 1535 P.M.

WASTE INSPECTION REPORT

CODE

CASE NAME <u>Chem Fab— Corp.</u>		LOCATION—STREET OR STATE ROUTE <u>300 N. Broad St.</u>		COUNTY <u>Bucks</u>		POPULATION <u>Doylestown</u>		MUNICIPALITY NO. <u>Thp</u>		TYPE CASE <u>5</u>					
RESPONSIBLE OFFICIAL <u>H. R. Becker</u>		TITLE <u>Exec. Vice President</u>		PHONE NO. <u>345-6789</u>		IND. WASTES & SEW. TYPE CASE NO. <u>03</u>		PERMIT COVERAGE <u>3</u>		FACILITIES COMPLIANCE <u>3</u>					
TYPE DISCHARGE OR INDUSTRY <u>Chemical</u>	NO. OF EMPLOYEES OR POPULATION SERVED <u>25</u>	ACRES UNDER PERMIT		ACRES ALREADY MINED		OPERATION STATUS <u>5</u>		LAST VIOLATION <u>1</u>		VIOLATION HISTORY <u>3</u>					
INDUSTRIAL PRODUCTS <u>etching metal parts</u>	1.	2.		3.		MINE DRAINAGE OPERATOR NO.		PERMIT NO.		MINE OPERATION STATUS <u>58</u>					
TREATMENT PROCESS		NO. OF UNITS TOTAL IN OPERATION		REMARKS											
<u>On afternoon of 12-3-71 at approx. 2:00 P.M., a valve broke on a draw-off line from a 2000 gal waste pre-treatment tank. Approximately "500 gals." of liquid waste escaped from tank thru the bottom when the line gave way. The pre-treatment tank holds & treats chromic acid rinse water for discharge to sanitary sewers in town. Prior to the spill, the pre-treatment tank contained approx. half untreated and half treated (acid) rinse water. The spilled wastes splashed onto concrete pad allowing it to flow in all directions - a large quantity flowing down company driveway to the curb-ditch hence to</u>															
LOCATION OF DISCHARGE	pH	CHOR. RES.	ODOR	TEMP.	D.O.	SPEC. COND.	QTY. M.G.D.	MINE DRAINAGE OPERATOR NO.				PERMIT NO.			
<u>A 300 N. Broad St.</u>	<u>—</u>	<u>—</u>	<u>Very pungent</u>	<u>—</u>	<u>—</u>	<u>—</u>	<u>Est. 500 gals.</u>	MINE DRAINAGE OPERATOR NO.				PERMIT NO.			
<u>B</u>				<u>AMBER COLORED</u>				MINE DRAINAGE OPERATOR NO.				PERMIT NO.			
<u>C</u>								MINE DRAINAGE OPERATOR NO.				PERMIT NO.			
RECEIVING STREAM APPEARANCE				WATER & WASTE QUALITY REPORT											
NAME	ABOVE DIST. APP.	BELOW DIST. APP.	LOCATION		NUMBER										
<u>Cooks Run Creek</u>	<u>25' - G</u>	<u>100' - P</u>	<u>Driveway at Chem Fab</u>		<u>67 3 3 99</u>										
	<u>(AMBER) Yellow, BANK-TO-BANK</u>		<u>Road ditch at creek</u>		<u>67 3 3 9 6</u>										
			<u>Cooks Run Creek, below</u>		<u>67 3 3 9 7</u>										
			<u>Cooks Run Creek, above</u>		<u>67 3 3 9 8</u>										
VIOLATIONS: <u>Discharge of Industrial Wastes Without a Permit</u>				LAW, REGULATION OR PERMIT COND. NOS. <u>Clean Streams Law</u>											
REMARKS: <u>(CONT.) the Cooks Run Creek. The creek was turned amber-colored bank to bank for hundreds of yards during inspection. Company spread "Lyko-pen", sodium hydrosulfide, on driveway to attempt to neutralize the wastes. Chem Fab is responsible for cleaning up wastes in driveway & along road ditch down to stream.</u>															
FIELD INVESTIGATOR <u>Barry Passmore</u>				TITLE <u>EPS</u>				PERSON INTERVIEWED <u>[Signature]</u>				TITLE <u>AR000029</u>			

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF HEALTH
SANITARY ENGINEERING

ORIGINAL
(Red)

INSPECTION
DATE 10-9-70
FROM 1:30 A.M. TO 2:45 P.M.

WASTE INSPECTION REPORT

CODE

CASE NAME Chem Fab Corp.		LOCATION—STREET OR STATE ROUTE 300 N. Broad St.		COUNTY 09	
RESPONSIBLE OFFICIAL Martin S. Toll		TITLE President		PHONE NO. 345-6789	
TYPE DISCHARGE OR INDUSTRY Chemical	NO. OF EMPLOYEES OR POPULATION SERVED 40	ACRES UNDER PERMIT	ACRES ALREADY MINED		
INDUSTRIAL PRODUCTS Etching metal parts	1.	2.	3.		
TREATMENT PROCESS		NO. OF UNITS TOTAL IN OPERATION		REMARKS	
Richard Becker, Gen. Mgr., stated that a concrete tank will be installed to collect industrial wastes which leaches from under parking lot into drainage course along N. Broad St. It will be then pumped to pretreatment unit, thence to Boro's san. sewer system. Expect to do above during week of 10/12/70					
LOCATION OF DISCHARGE	pH	CHOR. RES.	ODOR	TEMP.	D.O.
A Residual industrial wastes leaching from ground under the company's driveway into drainage ditch along N. Broad St.					
RECEIVING STREAM APPEARANCE		WATER & WASTE QUALITY REPORT			
NAME	ABOVE DIST. APP.	BELOW DIST. APP.	LOCATION	NUMBER	
Drainage ditch to Cooks Run.			NO SAMPLES COLLECTED		
VIOLATION: Illegal discharge of industrial wastes			LAW, REGULATION OR PERMIT COND. NOS. Clean Stream Law		
REMARKS:					
FIELD INVESTIGATOR Everett C. Kegg					
TITLE San. Engr.		PERSON INTERVIEWED Richard Becker		TITLE AR000030	

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF HEALTH
SANITARY ENGINEERING

ORIGINAL
(Red)

INSPECTION DATE	9-10-70
FROM 1030 A.M.	TO 1115 A.M.
P.M.	P.M.

WASTE INSPECTION REPORT

CODE

CASE NAME Chem Fab Corp.		LOCATION—STREET OR STATE ROUTE 300 N. Broad St.		COUNTY 1 0 2	
RESPONSIBLE OFFICIAL Richard Becker		TITLE Gen. Mgr.		PHONE NO. AI3-0810	
TYPE DISCHARGE OR INDUSTRY Chemical	NO. OF EMPLOYEES OR POPULATION SERVED 40	ACRES UNDER PERMIT	ACRES ADJACENT	MUNICIPALITY NO. 0 0 0	
INDUSTRIAL PRODUCTS Etching Metal Parts	1.	2.	3.	TYPE CASE 5	
TREATMENT PROCESS		NO. OF UNITS TOTAL IN OPERATION		REMARKS	
				ON 9-9-70 there was a	
				Chronic Acid Spill (red)	
				HAS appeared to be	
				Neutralized By Sodium Bisulfite.	
				Resultant compound in driveway	
				is a yellowish color.	
				AT several locations along the asphalt driveway	
				of Chemfab, there is still upward leeching to the	
				surface & drainage down the driveway to the drainage	
LOCATION OF DISCHARGE	pH	CHOR. RES.	ODOR	TEMP.	D.O.
A No observed					
B Discharge to					
C Cook's Run.					
RECEIVING STREAM APPEARANCE			WATER & WASTE QUALITY REPORT		
NAME	ABOVE DIST. APP.	BELOW DIST. APP.	LOCATION	NUMBER	
Cook's Run	15'-G	15'-F	UPWARD Leeching	6	6 4 5 8 4
			Discharge to		
			Asphalt Driveway		
VIOLATION:			LAW, REGULATION OR PERMIT COND. NOS.		
REMARKS: (CONT.) ditch along Broad St. The leeching seems to be dependent upon the rainfall. The Company plans to Re-surface the driveway in the near future. They have been instructed to immediately clean up all leeching caused by Chemfab & allow more to be cleaned up. The ditch along the					
FIELD INVESTIGATOR Benny Parnow			PERSON INTERVIEWED EPS 1		
TITLE EPS 1			TITLE AR000031		

Board of Health

Richard I. Darnell, M.D.,
Chairman

Robert F. Erhard, M.D.

John Jacoby

John L. Stover, Jr.

William J. Mackensen, Jr.

Director of Health

Edmund K. Lindemuth, M.D., M.P.H.

BUCKS COUNTY
DEPARTMENT OF HEALTH

Administrative Offices

Neshaminy Manor Center

Doylestown, Pennsylvania 18901

343-2800

Field Offices

143 S. 11th St.
Quakertown, Pa.
536-6500

410 Bath Road
Bristol, Pa.
788-0491

Neshaminy Manor Center
Doylestown, Pa.
343-2800

MEMORANDUM

January 24, 1969

TO: Charles Rehm
Assistant Regional Sanitary Engineer - Operations
Region I
FROM: Albert W. Wills
Chief Sanitary Engineer

SUBJECT: Illegal Industrial Waste Discharge
Chem Fab Corporation
Doylestown Borough, Bucks County

On January 23, 1969, E. C. Hogg, Sanitary Engineer with this Department, observed a yellow industrial waste discharge from the subject company. The discharge flowed from Chem Fab's asphalt driveway into a ditch along North Broad Street, hence to Cooks Run, a tributary of the Neshaminy Creek. Samples were collected of the industrial waste from the ditch and of Cooks Run below the point of waste discharge.

Wills made an inspection of the area on January 24 and observed a yellow discharge from Chem Fab entering Cooks Run, as described above. An interview was conducted with Martin S. Toll, President of Chem Fab, who contended the discharge was beyond his control. In his opinion, the discharge is a result of the rainfall carrying residual underground pollutants to the surface. Wills advised him that such a contention does not justify pollution and necessary steps must be taken to correct the problem.

At several locations on Chem Fab's asphalt driveway, yellow waste was observed leaching to the surface. In addition, the ground around the driveway to the east is saturated with waste.

Accordingly, this Department requests the Regional Office to take additional enforcement action in this case.

AWW/lb

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF HEALTH
DIVISION OF SANITARY ENGINEERING

ORIGINAL
(Red)

9. INSPECTION DATE	8-8-67		
10. FROM	210 PM	TO	3 PM

WASTE DISCHARGE REPORT

CODE

11. CASE NAME CHEM FAB CORP		12. LOCATION - STREET OR STATE ROUTE 300 N. BROAD ST		REGION VII		1. 7			
13. PERSON INTERVIEWED M.S. TOLL		14. TITLE PRESIDENT		15. PHONE NO. DI-30810		COUNTY DOCKS		2. A	
16. TYPE INDUSTRY CHEMICAL		17. NO. OF EMPLOYEES 40		21. POPULATION SERVED		MUNICIPALITY DOYLESTOWN		3. 0	
18. INDUSTRIAL PRODUCTS (A) ETCHING METAL PARTS (B)		(C)		TYPE BARO		5. 2			
19. PRESENT PRODUCTION (A) (B)		(C)		TYPE CASE 5		6. 5			
20. MUM PRODUCTION (A) (B)		(C)		22. NO. OF DISCHARGES A. SEWAGE B. IND. WASTE		CLD OR NEW ESTAB'MENT 1		28. 1	
23. TREATMENT PROCESS INDUSTRIAL WASTES; DOYLESTOWN S.T.M.		24. NO. OF UNITS TOTAL IN OPERATION		25. REMARKS DISCHARGE TO STREAM OBSERVED ON 4/24/67 ADJACENT BY REMOVING SEEPING ABANDONED UNDERGROUND TANKS. ADJACENT AREA REPAVED,		31. 1		32. 1	
						33. 7		34. 0	
						35. 1		36. 5	
						37. 1		38. 1	
						39. 1		40. 1	
						41. 1		42. 1	
						43. 1		44. 1	
						45. 1		46. 1	
						47. 1		48. 1	
						49. 1		50. 1	
						51. 1		52. 1	
						53. 1		54. 1	
						55. 1		56. 1	
						57. 1		58. 1	
						59. 1		60. 1	
						61. 1		62. 1	
						63. 1		64. 1	
						65. 1		66. 1	
						67. 1		68. 1	
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						71. 1		72. 1	
						73. 1		74. 1	
						75. 1		76. 1	
						77. 1		78. 1	
						79. 1		80. 1	
						81. 1		82. 1	
						83. 1		84. 1	
						85. 1		86. 1	
						87. 1		88. 1	
						89. 1		90. 1	
						91. 1		92. 1	
						93. 1		94. 1	
						95. 1		96. 1	
						97. 1		98. 1	
						99. 1		100. 1	

April 28, 1967

CERTIFIED MAIL

Subject: Industrial Wastes
Chem Fab Corporation
Doylestown Borough
Bucks County

Mr. Martin S. Toll, President
Chem Fab Corporation
300 N. Broad Street
Doylestown, Pennsylvania

RECEIVED

MAY 1 - 1967

BUCKS CO. DEPT. OF HEALTH

Dear Mr. Toll:

Complaints are being received in this office reporting that your company is discharging industrial wastes to Cooks Run, a Tributary to Neshaminy Creek.

An inspection conducted on April 24, 1967, by Mr. Samuel Katz, Chemist, revealed an illegal discharge of industrial wastes from your establishment to Cooks Run.

This is to notify you that the discharge of industrial wastes to State waters without a permit is a violation of the Clean Streams Law, the Act of June 22, 1937, P. L. 1987, as amended.

Under the circumstances, corrective measures must be taken promptly and by May 9, 1967, we expect a clear-out statement from you describing the action being taken to accomplish compliance. The statement must include the date by which compliance will be accomplished and the manner in which you intend to accomplish it in order to prevent a recurrence of the violation.

Very truly yours,

Howard G. Luley
Asst. Regional Sanitary Engineer-Operations

HGL/SK/brm

cc: Bucks County Health Dept. ✓

AR000034

CERTIFIED MAIL: Return Receipt Requested