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TELECOPIER COMMUNICATIONS SHEET

TO TELECOPIER NUMBER: 215-597-7906

The following page(s) are for:

NAME: Mr. Christopher P. Thomas, Environmental Engineer

LOCATIONS: EPA - Region III, CERCLA Removal Enforcement Section

COMMENTS: Attached is the workplan for removal of glycol and the 2 tanks. Please call me upon receipt of this fax, at 718-387-2100. In any event, I plan to be in Phil. on Tuesday 5/9/89. See if you can have this resolved by then.

FROM: Eugene Petreiches - AAA Warehousing FAX: (718) 387-1220

DATE: May 8, '89 TIME: _____

TOTAL NUMBER OF PAGES 3 INCLUDING COVER SHEET

IF YOU HAVE NOT RECEIVED ALL THE PAGES THAT ARE INDICATED,
OR ARE HAVING A PROBLEM WITH THE RECEPTION OF THE MATERIAL,
PLEASE CONTACT OUR OFFICE AT (718) 387-2100

100128

AAA WAREHOUSING, INC.
527 BEDFORD AVENUE
BROOKLYN, N.Y. 11211

3.31.88

TO DIRECTOR OF OPERATIONS
2300 S. DELAWARE AVE

In the course of events and the change in ownership of facilities bordering on East Shoreline of Delaware ave (S.2300), Bigler st on the north, Delaware River on the East and Packer ave on the south, a undetermined amount of liquid ethylene glycol was left in Sphere tanks #70, #71, #72, #75, #76 and associated pipe lines at tanks and leading to Dock on Pier 96

Tanks and pipe lines were dedicated to ethylene glycol and no connections to any other pipes or tanks exist. Tanks and Pipelines are of welded steel construction and in good condition.

It is our intent to pursue the removal of all ethylene glycol that can be recovered by connecting to low spots point #1 & Point #2 with heavy duty hoses with leak proof evertite fittings in 2" & 3" size to a 8HP, gasoline fueled Homelite 300 Pump and Pump to tank truck till all recoverable material is removed and put back all connections to their original state. It is not expected that any liquids will be spilled or lost. all considerations and efforts will be made to Preserve the integrity and safety of the facility.

100129

REVISED WORK PLAN TO REMOVE (2) 150,000 GAL. TANKS
TRIPLE C RAILCAR SERVICE, INC.

1. Sign in at main gate and coordinate work plan etc., with authorities.

2. Disconnect the walkway from each of the tanks.

3. We would then load the (2) tanks onto a barge at pier 108 and remove them as follows :

A. Load each tank (individually) by using a 100 ton rubber tired crane with approved (3) way chain and hook assembly, and lift them on to a barge. The (2) 150,000 gallon tanks have hooks on the top which were used to erect them. We intend to use these existing hooks for their removal.

B. Secure the tanks to the barge by using approved tie down chain, hooks, and boaming tools.

C. The tanks would be inspected by the supervisor on hand to assure that they are safe for movement.

4. When the barge has cleared pier 108 the area will be secured to the satisfaction of the plant authorities and sub-contract workers will sign out at the main gate.

5. The barge company will check out pier 108, and will certify before loading that the pier is safe for passing.

Work Plan to Remove Railcars
Triple C Railcar Service, Inc.

1. Sign in at gate and coordinate work plan etc. with authorities.

2. All employees to be suited with full protective clothing including rubber boots, gloves and full face cartridge respirator.

3. Before any work is started the immediate area(s) will have an explosion meter and toxicity meter check to be certain that there are no explosive or toxic fumes in the work area.

4. Clean rail tracks using care not to create sparks etc. Workmen will have fire extinguisher.

5. All wood, debris, etc. on rail tracks will be moved aside but <u>will not</u> be removed from the job site since, it is not the responsibility of AAA Warehousing to remove this material. Care will be taken with any asbestos present on the rail tracks to assure its safe handling. If any is found, it will be wet down with water from a low pressure sprayer, packaged in approved plastic bags and disposed of in on-site EPA supplied containers.

At <u>all</u> times <u>all</u> employees will be sure not to enter the "unsafe structure" here after referred to as structure.

6. A mobil car mover is a gasoline powered vehicle similar to a tractor used for pulling highway trailers with the exception that it is supplied with retractable pneumatic tires and metal rail track wheels.

The mobil car mover will be driven by a trained operator. All "ground" operations in moving the rail cars will be performed by a trained switchman. This "switch crew" will be in constant two way radio contact with each other.

After the debris has been removed and it has been determined that the rail tracks are safe for rail car movement. The mobil car mover will be moved by the switch crew, on its pneumatic tires around the structure to the opposite end of the rail cars, that is, to the rail car furthest away from the structure, here after referred to as "end car".

The mobil car mover will be placed on the rail tracks, coupled to the end car and air brakes hooked up. This entails raising the pneumatic tires, locking the couplers together and physically hooking together the air hoses from the mobil car mover to the end car. If the other rail cars are not coupled to the end car, they will be at this time and air brakes hooked up. This group of rail cars will form a "cut".

An air brake application will be made to assure air brakes work on all cars and a visual inspection performed on all cars to assure they are safe for movement prior to moving the cut.

The cut will be pushed at a speed of not more than three (3) M.P.H., into and through the structure, being sure the switch crew does not physically enter the structure. The cut will be stopped when the rail car at the opposite end

from the mobil car mover, here after referred to as the "head car" is pushed completely through and out the other end of the structure.

At this time the mobil car mover will apply the air brakes on the cut, uncouple from the end car and derail itself from the rail track. The brakes will remain applied on the cut with the mobil car mover uncoupled and the air brake hoses unhooked from the cut.

The mobil car mover will then move around the structure on its pneumatic tires to the head car placed on the rail tracks, coupled to the head car and the air brakes hooked up. The air brakes on the cut will be released, the cut pulled through and out of the structure to just outside the front gate.

When the cut is safely out of the plant each car will receive an Association of American Railroad inspection to assure a safe transfer by Conrail from Philadelphia to Triple C Railcar.

Mr. Bruce Turek, Conrail's Terminal Superintendent, will be notified of any defects so that they can be repaired at Conrail's repair track which is approximately 1/2 mile from the plant. Conrail inspectors will also inspect for defects.

7. When the rail cars have been removed, the area will be secured to the satisfaction of the plant authorities and sub-contract workers will sign out at the main gate.

REVISED WORK PLAN TO REMOVE (2) PUMPS, MOTORS AND AGITATOR @
#9476 BLENDING TANKS
TRIPLE C RAILCAR SERVICE, INC.

1. Sign in at main gate and coordinate work plan etc..with authorities.

2. All employees to be suited with full protective clothing including rubber boots, gloves, safety glasses and cartridge respirator.

3. Before any work is started the tanks must be inspected to determine if they are safe to move as follows:
   A. Check interiors with explosion meter
   B. Check interiors with toxicity meter
   C. All employees involved would be provided a copy of the M.D.S. on Ethylene Glycol.

4. The equipment would be removed as follows:
   A. Any residue would be drained from the pumps, motors and agitator as well as any pipes and fittings related to the equipment into a bulk tank trailer using a vac truck for removal. The Glycol will be loaded onto a tanker that is owned by MacArthur Petroleum & Solvent, Inc. of 126 Passaic Street, Newark, New Jersey, and will be stored in an extra tank of theirs. As the sample taken from the pipeline indicates, the Glycol is not contaminated, and Macarthur Petroleum will be responsible for the material. Any washwater mixed with the Ethylene Glycol will not be disposed of but will instead be sold by the MacArthur Petroleum & Solvent Co. to be used as prediluted industrial coolant.
(We would need a temporary E.P.A. ID number for disposal and handling purposes.)

   B. We would use care to prevent any spills however, we would cover the immediate area surrounding the equipment including the pump hose and directly below the connection to the bulk trailer with polyethylene material. Any polyethylene material contaminated with Ethylene Glycol will be drummed, and then transported by and to Delaware Container US EPA ID Number PAD 064375470 for disposal.

100133

   1. Disconnect all fittings from the equipment and plug any pipe or valves that would be otherwise left open.
   2. Plug the drainage opening and close any openings at the #9476 blender tank.
   3. Make certain the area is secured and cleaned of any materials we used in removal of the equipment.