orig

NUS CORPORATION
A Halliburton Company

SEMS DocID 2334328

8701-63-28

ORIGINAL (Red)

[redacted]

FIELD INVESTIGATION TEAM ACTIVITIES AT UNCONTROLLED HAZARDOUS SUBSTANCES FACILITIES — ZONE I

NUS CORPORATION
SUPERFUND DIVISION

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R-585 -7-17

PRELIMINARY ASSESSMENT OF WETHERILL AND COMPANY, INCORPORATED/BIL DRY CORPORATION PREPARED UNDER

TDD NO. F3-8701-63
EPA NO. PA-1219
CONTRACT NO. 68-01-7346

FOR THE

HAZARDOUS SITE CONTROL DIVISION
U.S. ENVIRONMENTAL PROTECTION AGENCY

JUNE 12, 1987

NUS CORPORATION
SUPERFUND DIVISION

SUBMITTED BY	REVIEWED BY	APPROVED BY
[redacted]		
ENVIRON. SCIENTIST	ASSISTANT MANAGER	REG. OPERATIONS MANAGER, FIT 3

(b) (4)

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SECTION 1

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1.0 INTRODUCTION

1.1 Authorization

NUS Corporation performed this work under Environmental Protection Agency Contract No. 68-01-7346. This specific report was prepared in accordance with Technical Directive Document No. F3-8701-63 for the Wetherill and Company, Incorporated property, located in Philadelphia, Pennsylvania. For the purposes of this report, the actual name of the company, Bil Dry Corporation, will be used.

1.2 Scope of Work

NUS FIT 3 was tasked to conduct a preliminary assessment of the Wetherill and Company, Incorporated property in Philadelphia, Pennsylvania.

1.3 Summary

Bil Dry Corporation is the present occupant at the site, located at 5525 Grays Avenue in Philadelphia, Pennsylvania; the company presently possesses equitable ownership of the property. Bil Dry makes glue, wall coatings, wall plasters, and various other concrete products and generates no hazardous wastes from the processes. Bil Dry bought the facility from Chemical Compounds, Limited in October 1985.[1]

Chemical Compounds, Limited made paints at the facility.[1] Paint, paint sludge, other unknowns, and drums were left on an embankment at the rear of the property. In addition, about 160, almost all dry, 55-gallon drums were left in a vacant lot just north of the plant buildings.[2,3] The city of Philadelphia cited Bil Dry with a health and nuisance violation and ordered cleanup of the property by June 10, 1987.[1] In addition, a notice of violation was served by the Pennsylvania Department of Environmental Resources (PA DER). A proposal and schedule for removal of all wastes on site was requested.[2] Accordingly, a plan by the company has been submitted to PA DER.[1]

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SECTION 2

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2.0 THE SITE

2.1 Location

The site is located at 5525 Grays Avenue in Philadelphia, Pennsylvania. Using the Philadelphia topographic quadrangle map, the site's map coordinates are 39° 56' 54" north latitude and 75° 13' 36" west longitude. Measuring from the lower right-hand corner of the map, the site may be found 13 inches west and 10-1/2 inches north.[4]

2.2 Site Layout

The site is approximately four acres in size and is bounded by railroad tracks to the west, the Fisher Belting Company to the north, Grays Avenue to the east, and Cornell Iron Company, Incorporated to the south. The main waste area is located between the railroad tracks and the loading dock of the production buildings. A number of mostly empty drums were left in a vacant lot just north of the production buildings. Access to the property from Grays Avenue is restricted by a cyclone fence. Amtrak has an easement through the vacant lot, and the gate to the lot is not always kept locked. There is no fence along the western edge of the property and access from this side of the property is open (see appendix B, figure 2).

2.3 Ownership History

Bil Dry now owns the facility. They bought the property from Chemical Compounds, Limited in October 1985.[1]

2.4 Site Use History

Bil Dry presently uses the facility to make various concrete products. No hazardous wastes are generated in any of Bil Dry's processes. Chemical Compounds, Limited made paints at the facility.[1]

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2.5 Permit and Regulatory Action History

The city of Philadelphia cited Bil Dry with a health and nuisance violation and ordered cleanup of the property by June 10, 1987.[1] PA DER inspected the property on January 28, 1987 and served Bil Dry with a notice of violation of the Department Act 97, Solid Waste Management Act (1980).[2]

2.6 Remedial Action To Date

The waste material on the embankment and the soil immediately beneath it will be scraped and shoveled into drums by company personnel. These drums and any others left on the property that contain material will be stored in an enclosed storage shack indoors until the contents can be analyzed to determine proper disposal methods. The exposed soil remaining on the embankment will be analyzed.[1] The empty drums at the vacant lot north of the building have been stacked neatly on pallets at the lot.[5] Plans call for these drums to be sold to a drum reconditioning company.[6]

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SECTION 3

3.0 ENVIRONMENTAL SETTING

3.1 Water Supply

The Philadelphia Water Company serves approximately 500,000 customers and operates 3 water treatment plants in the city. The Torresdale Water Treatment Plant is located on the Delaware River, approximately 14 miles northeast of the site. The Belmont Water Treatment Plant is located on the Schuylkill River between the Falls Bridge and Wissahickon Creek. The intake is approximately [redacted] (b) (9) [redacted] of the site. The Queen Lane Water Treatment Plant is located near the intersection of West River Drive and Montgomery Drive. This intake is also approximately [redacted] (b) (9) [redacted] of the site.[7,8] Bil Dry and residents within a three-mile radius of the site utilize this public water supply.

3.2 Surface Waters

Bil Dry is located less than 1/2 mile west of the Schuylkill River. The portion of the river within three miles downstream of the site is heavily industrialized and there is little boating or fishing. There are no surface water intakes along this portion of the river.[9]

3.3 Hydrogeology

3.3.1 Geology

The site is situated in the Fall Zone, which separates the Piedmont Uplands Section of the Piedmont Physiographic Province from the Coastal Plain Physiographic Province. The Coastal Plain is characterized as a wedge of unconsolidated sediments that dip and thicken to the southeast. The Piedmont is characterized by igneous and metamorphic rocks which form a series of northeast-southwest trending uplands of rounded hills dissected by relatively narrow valleys.[10,11]

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The site is underlain by the Tertiary age Pennsauken and Bridgeton Formations (undifferentiated) and the Precambrian age Wissahickon Formation. The Pennsauken and Bridgeton Formations consist of dark reddish-brown, cross-stratified, feldspathic, quartz sand with some thin bands of fine gravel and rare clay and silt layers. The Coastal Plain sediments are thin at the site, ranging in thickness from 0 to 10 feet. The Wissahickon Formation, which underlies the Pennsauken and Bridgeton Formations and subcrops at the site, is mapped as oligoclase-mica schist. This unit also contains some hornblende gneiss, some auger gneiss, and some quartz-rich and feldspar-rich members due to varying degrees of granitization. Blanketing the Wissahickon is a layer of highly weathered and fractured parent material termed saprolite.[10,11]

3.3.2 Soils

The site is mapped as urban land, zero to eight percent slope. Urban land is found in highly built up areas with highly variable soils and foundation materials. Original soils have been disturbed, filled over, or otherwise destroyed prior to construction.[12]

3.3.3 Groundwaters

Groundwater movement and storage occurs in primary or intergranular porosity in the unconsolidated sediments of the Pennsauken and Bridgeton Formations. Secondary porosity, such as fractures, joints, and separation along cleavage planes, provides the Wissahickon Formation with space for groundwater movement and storage. Groundwater in the saprolite zone will generally occur in both primary and secondary openings. The unconsolidated sediments and saprolite provide the best aquifers in the area. Groundwater will occur under water-table conditions (unconfined) in both the Coastal Plain sediments and the Wissahickon Formation at the site. The direction of groundwater flow at the site is expected to be east toward the Schuylkill River.[10,11]

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3.4 Climate and Meteorology

The average annual temperature in the area is 54.6 inches. The average annual precipitation is 41.38 inches. Net precipitation is 7.38 inches. The 1-year, 24-hour rainfall is 2.5 inches.[13]

3.5 Land Use

The site is located within the city limits. Light industry, as well as row homes, surround the site.[3]

3.6 Population Distribution

The population within a three-mile radius of the site is densely distributed. The number of people in the 3-mile radius is approximately 500,000 persons.[14]

3.8 Critical Environments

There is no wetland-coastal area within two miles of the site. The Schuylkill River is less than 1/2 mile east of the site. The United States Department of the Interior, Fish and Wildlife Service, has no information to indicate that any endangered species under its jurisdiction resides within a three-mile radius of the subject site.[15]

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SECTION 4

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4.0 WASTE TYPES AND QUANTITIES

Paint, paint sludge, other unknowns, and drums were left on a small hill behind the loading dock at the facility. Some of the drums left on the loading dock as well as at the vacant lot had some material in them.[2] Information regarding the quantity of waste at the facility was unavailable.

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SECTION 5

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5.0 FIELD TRIP REPORT

5.1 Summary

On Tuesday, February 24, 1987, FIT 3 members [redacted] (b) (4) and [redacted] (b) (4) conducted a preliminary assessment of the subject site. FIT 3 was accompanied by Patrick Bolling, plant supervisor.

The weather was sunny, with temperatures of 35°F to 40°F. There were approximately four inches of snow on the ground.

5.2 Persons Contacted

5.2.1 Prior to Field Trip

Patrick Bolling
Plant Supervisor
Bil Dry Corporation
5525 Grays Avenue
Philadelphia, PA 19143
(215) 724-1000

Frank Holmes
Supervisor
PA DER
Ridley Creek State Park
Sycamore Mills Road
Media, PA 19063
(215) 565-1687

Daniel J. Garber, Esquire
Corporate Counsel
Bil Dry Corporation
3505 West Grand River Avenue
Howell, MI 48843
(517) 546-8330

Lorie Acker
Site Inspection Officer
U.S. EPA
841 Chestnut Building
Ninth and Chestnut Streets
Philadelphia, PA 19107
(215) 597-3165

5.2.2 At The Site

Patrick Bolling
Plant Supervisor
Bil Dry Corporation
5525 Grays Avenue
Philadelphia, PA 19143
(215) 724-1000

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5.2.3 Post Site Visit

Patrick Bolling
Plant Supervisor
Bil Dry Corporation
5525 Grays Avenue
Philadelphia, PA 19143
(215) 724-1000

Mark Bonenberger
Waste Management Specialist
PA DER
Ridley Creek State Park
Sycamore Mills Road
Media, PA 19063
(215) 565-1687

Daniel J. Garber, Esquire
Corporate Counsel
Bil Dry Corporation
3505 West Grand River Avenue
Howell, MI 48843
(517) 546-8330

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5.3 Site Observations

- One drum on the loading dock had an HNU reading of up to 50 ppm. No HNU readings above the 0.5 ppm background level were recorded anywhere else on the property.

- No mini-alert soundings above the X1 background level were recorded.

- Approximately 16 drums were located on a small hill behind the loading dock.

- There were approximately 60 drums located in the northwestern corner of the vacant lot (see appendix B, figure 2). There was no evidence that these drums contained anything.

- There were approximately 100 drums stacked and piled up in the northeastern corner of the vacant lot (see appendix B, figure 2). At least three of these drums had some liquid in them but were observed to be intact with no evidence of leakage and no HNU readings.

- Amtrak has an easement through the vacant drum lot, so the gate to this lot is not always locked.

- Most drums were marked "Mirasol" or "resin solution."

- A number of drums were left on the loading dock.

- Some of the drums on the loading dock were marked "synthetic resin solution," "resins," "Rhoplex," or "mineral spirits."

- The drums on the loading dock were in good condition and most were on pallets. No spillage was observed.

Bil Dry
F3-8701-63
PA-1219

RIPS
Photo No. 3

Drums on embankment

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2/24/87

Bil Dury
F3-8701-63
PA-1219

RIP4
Photo No. 2

Drums on embankment

(b) (4)

1000
2/24/87

Bil Drug
F3- 8701-63
PA- 1219

RIP3
Photo No. 1

Drums on embankment

1000

(b) (4)

2/24/87

Bil Dry
; -8701-63
PA-1219

RIP16
Photo No. 4

Drums on loading dock

(b) (4)

1000
2/24/87

Bil Stung
F3-8701-63
-1-1219

RIP15
Photo No. 5

Drums on loading dock

(b) (4)

1000
2/24/87

Bil Dry
F3-8701-63
PA-1219

R1P14
Photo No. 6

Drums on loading dock

(b) (4)

1000
2/24/87

Bil Drug
F3-8701-63
PA-1219

R1P6
~~Pho~~
Photo No. 7

Northeast corner of vacant lot

(b) (4)

1000
2/24/87

Bil Dry
F3-8701-63
PA-1219

R1P7
Photo No. 8

Northeast corner of lot
looking northwest.

(b) (4)

1000
2/24/87

Bil Dwy
F3-8701-63
PA-1219

RIP8
Photo No. 9

Northeast corner of lot looking towards second area.

(b) (4)

1000
2/24/87

Bil Dry
F3-8701-63
PA-1219

RIP10
Photo No. 10

Second drum area

(b) (4)

1000
2/24/87

Bil Dry
F3-8701-63
PA-1219

R1P9
Photo No. 12

Looking south towards open gate and production building

(b) (4)

1000
2/24/87

DO

Bil Dry
F3-8701-63
PA-1219

R1P13
Photo No. 11

Close up of second drum area

(b) (4)

1000
2/24/87

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APPENDIX A

FIT ZONE I CONTRACT
CONTRACT NO. 68-01-7346
TECHNICAL DIRECTIVE DOCUMENT (TDD)

1.A. COST CENTER: Region 3

1.B. ACCOUNT NO.: S575PAH4PA

2. NO.: F3-8701-63 ORIGINAL (Red)

2.A.: [X] NEW ASSIGNMENT [ ] AMENDMENT

3.A. PRIORITY: [X] HIGH [ ] MEDIUM [ ] LOW

4.A. ESTIMATE OF TECHNICAL HOURS: ~~60~~ 80

5.A. SSID NO.:

5.B. EPA SITE NAME: PA-1219 Wetherill & Co. Inc

6. DESIRED REPORT FORM: [X] FORMAL REPORT [ ] FORMAL BRIEFING [ ] LETTER REPORT [ ] OTHER (SPECIFY):

3.B. KEY EPA CONTACT: NAME: L. Acker PHONE: 597-3165

4.B. ESTIMATE OF SUBCONTRACT COST:

5.C. CITY/COUNTY/STATE: Philadelphia, Philadelphia, PA

7.A. START DATE: 2/87

7.B. ESTIMATED COMPLETION DATE: 4/10/87 DRAFT

8. TYPE OF ACTIVITY:
[X] PA [ ] SI [ ] ESI [ ] HRS SUPPORT [ ] QA SUPPORT [ ] SPECIAL STUDIES
[ ] ENFORCEMENT SUPPORT [ ] TRAINING [ ] EQUIPMENT MAINTENANCE
[ ] GENERAL TECHNICAL ASSISTANCE [ ] PROGRAM MANAGEMENT

GENERAL TASK DESCRIPTION:
Conduct a Preliminary Assessment of the subject site.

10. SPECIFIC ELEMENTS:
1.) Review background information.
2.) Contact state and local agencies for relevant information.
3.) Arrange for site access.
4.) Conduct a brief on and off site inspection to determine potential sample locations.
5.) Prepare and submit preliminary assessment report including proposed sampling plan and rationale, if applicable.
6.) All work on this project to be performed according to: WP-PA-1, Rev. 1.

[ ] ADDITIONAL SCOPE ATTACHED

11. INTERIM DEADLINES:

12. COMMENTS: State Code 042 County Code 101

13. AUTHORIZING: [ ] RPO [ ] DPO [ ] PO
(SIGNATURE)

14. DATE:

15. RECEIVED BY: [ ] ACCEPTED [ ] ACCEPTED WITH EXCEPTIONS (ATTACH) [ ] REJECTED
(CONTRACTOR FITOM SIGNATURE)

16. DATE:

SHEET 1 WHITE-FITOM COPY

SHEET 3 CANARY-RPO COPY

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APPENDIX B

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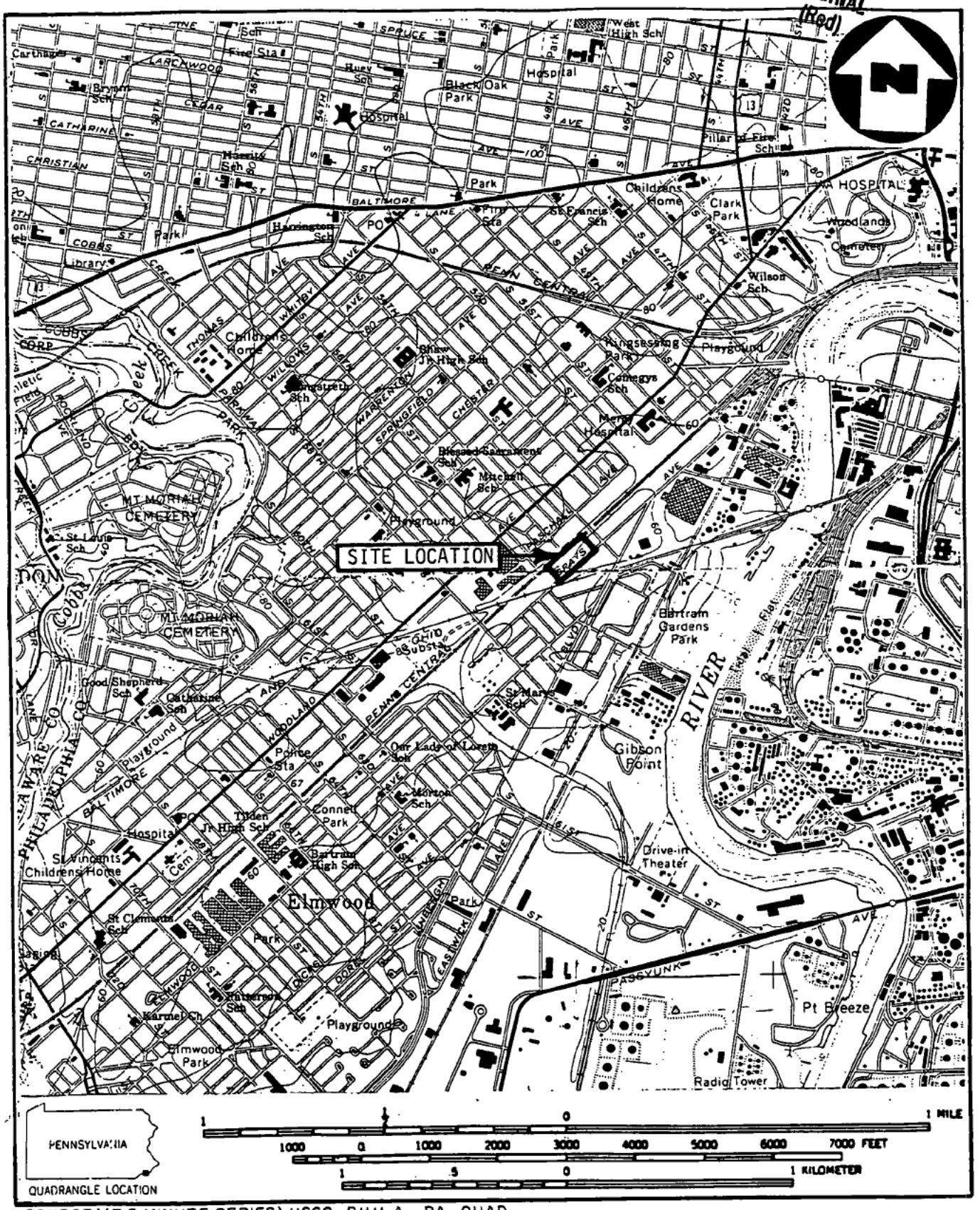


SOURCE: (7.5 MINUTE SERIES) USGS PHILA., PA QUAD.

FIGURE I

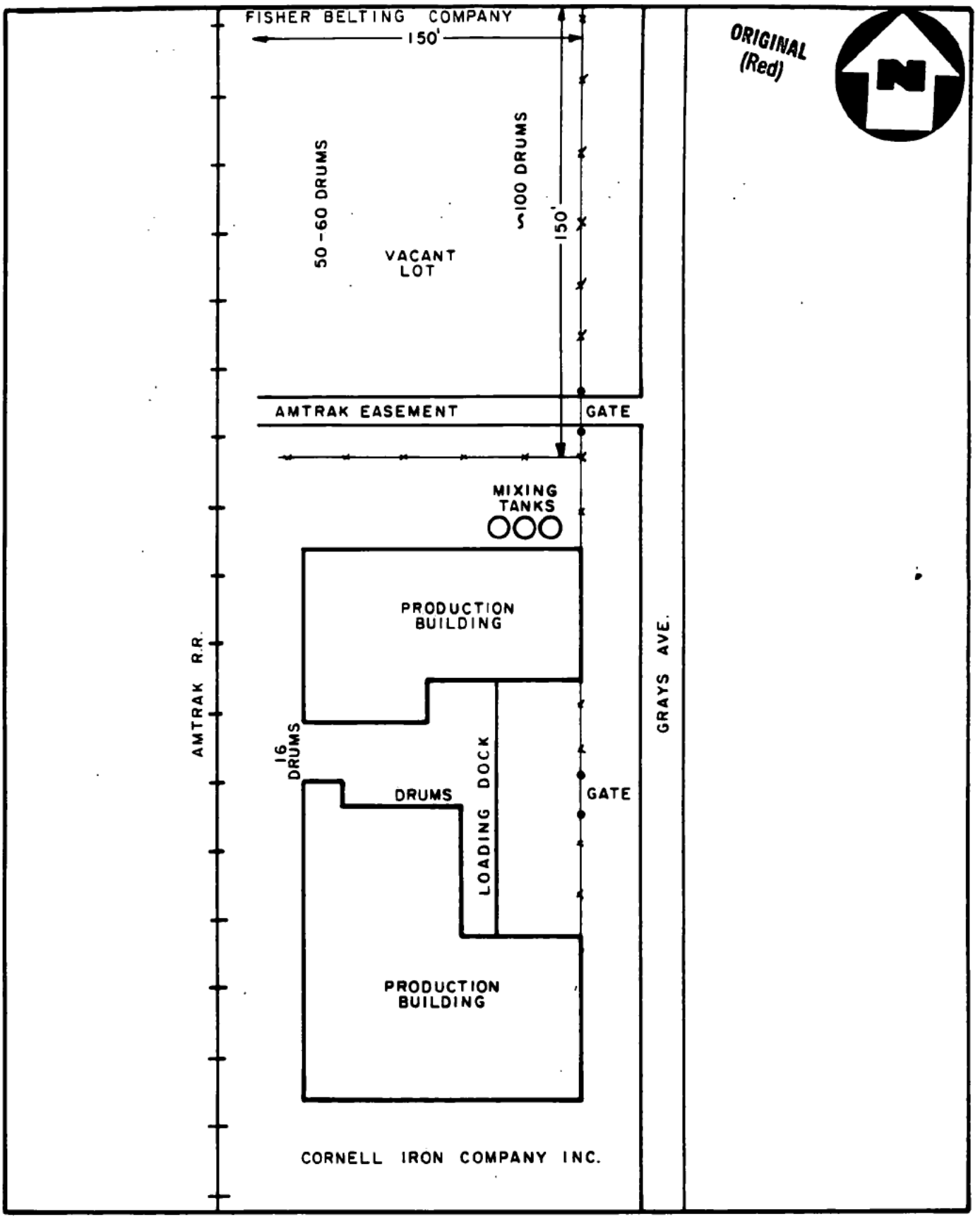
SITE LOCATION MAP

BIL DRY CORP., PHILA., PA

SCALE 1:24000

NUS CORPORATION

A Halliburton Company



SITE SKETCH

BIL DRY CORP., PHILA., PA

(NO SCALE)

FIGURE 2

NUS CORPORATION

A Halliburton Company

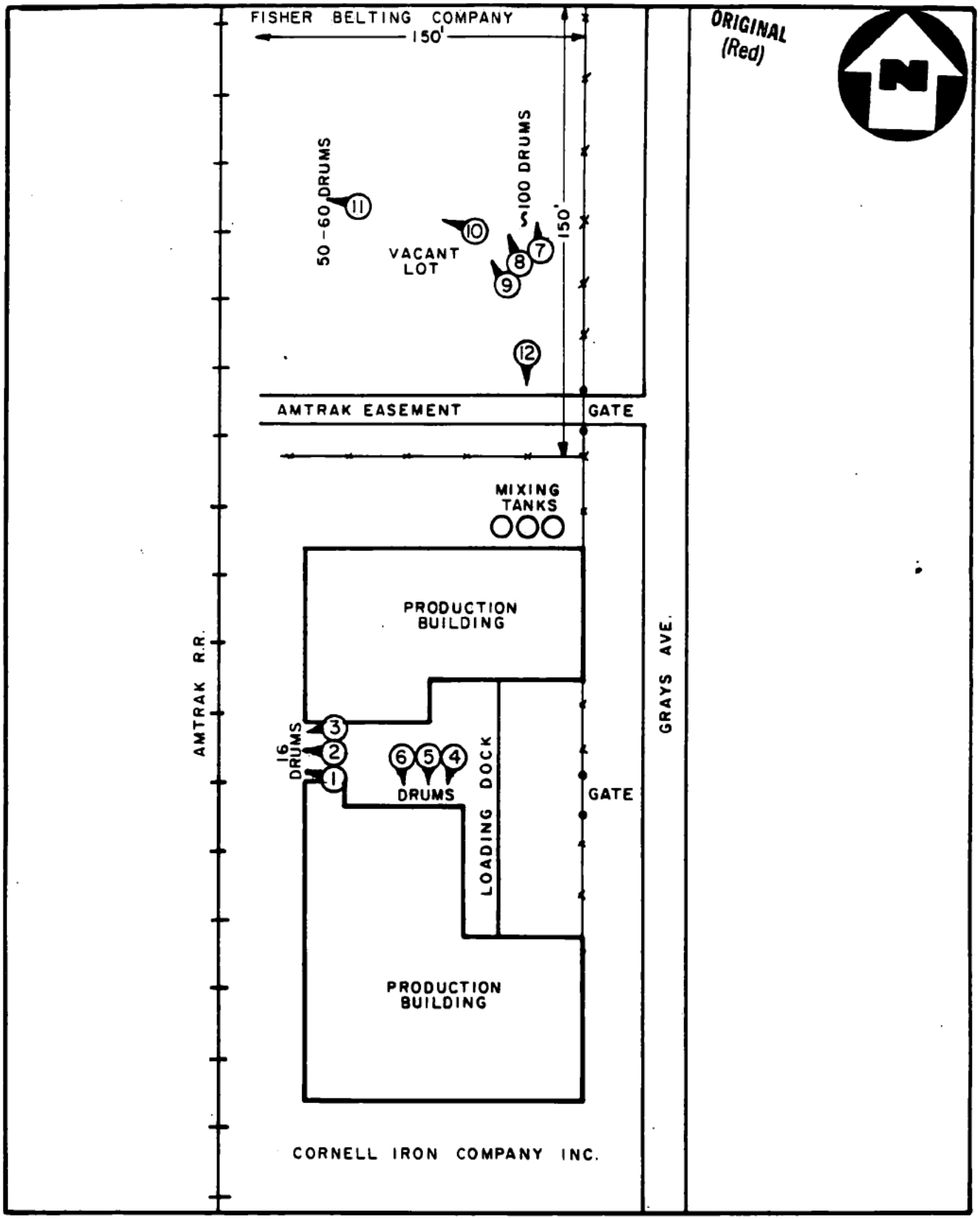


PHOTO LOCATION MAP

BIL DRY CORP., PHILA., PA

(NO SCALE)

FIGURE 3

NUS CORPORATION

A Halliburton Company

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APPENDIX C

Ridley File

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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
Ridley Creek State Park
Sycamore Mills Road
Media, PA 19063
(215) 565-1687

January 30, 1987

Mr. Dan Garber
3505 West Grand River
Howell, MI 48843

Re: Bil-Bry Chemical Compounds
5525 Grays Avenue
Philadelphia, PA 19143
Complaint II X87029114148

NOTICE OF VIOLATION

Dear Mr. Garber:

This letter is to confirm the findings of the Department's referenced inspection on January 28, 1987, which revealed that paint sludge and other unknowns were dumped on the ground along the outside embankment of your facility.

Such action is in violation of the Department's Act 97, Solid Waste Management Act (1980) Article III, Residual Waste, Section 301. Management of Residual Waste and Article IV. Hazardous Waste, Section 401. Management of Hazardous Waste.

It was also noted that there were numerous 55 gallon drums containing unknown material, a QC lab containing off-spec material, solvents,... and an adjacent lot containing numerous, presumably empty corroded 55 gallon drums.

We request that you submit to this office within (14) days a proposal and schedule for the removal of all wastes on-site, any testing done to determine disposal methods and any manifests or shipment records ofwastes shipped off-site.

This letter does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any or all violations of law arising prior to or after the issuance of this letter or the conditions upon which the letter is based. This letter shall not be construed so as to waive or impair any rights of the Department of Environmental Resources, heretofore or hereafter existing.

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This letter shall also not be construed as a final action of the Department of Environmental Resources.

If you have any questions concerning this matter, please feel free to contact me at 565-1687.

Sincerely,

Mark Bonenberger
Waste Management Specialist

cc: Gary Bonner
Regional File
Ridley File ✓
Pat Bolling