

Appendix G

DEP File Records

61103
York Co.

HAZARDOUS WASTE INSPECTION REPORT
Generators - Part A

Date of inspection 2-24-81 Time start 1:00pm Time finish 2:50pm
Name of inspector JOSEPH A. KOTLOSKY
Company, installation name KEYSTONE COLOR WORKS, INC.
Location 151 W. GAY AVENUE
County YORK, Pa. 17403 Municipality CITY OF YORK
Identification number PAD # 003018256
Name of responsible official ROBERT E. HAMME #854-9541
Title Manager
Mailing address 151 W GAY AVE YORK, Pa. 17403
Area code and phone no. 717-854-9541
Name of person interviewed ROBERT E. HAMME
Title Manager
Mailing address (if different from above) Same as above
Area code and phone no. 717-854-9541

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. 2735 kg./mo.
b. 29,800 kg./yr.

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

K002, Generated prior to 11/19/80. Recent Sludge
Under going Analysis, to be submitted to DER

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

10 drums of K002 generated prior to 11/19/80
presently stored onsite pending location of
proper disposal site.

1- NON-COMPLIANCE, 2- COMPLIANCE, 3- NOT APPLICABLE, 4- NOT DETERMINED

COMPLIANCE STATUS				REQUIREMENT	CHAPTER CITATION
1	2	3	4		75.262
	X			Identification number	(c) (1)
		X		Hazardous waste shipments offered only to licensed transporters	(c) (4)
		X		Authorization received from TSD facility for wastes shipped off-site	(d)
		X		PA manifest used for intrastate shipments	(e) (1) (i)
		X		Disposer state manifest or EPA format manifest used for out-of-state shipments	(e) (1) (i)
		X		Manifests filled out properly and completely	(e) (2) (i)
		X		Manifests routed properly and within time limits (24 hours)	(e) (2)
X				Proper U.S. DOT shipping containers or packages	(f) (1) (i)
X				Shipping containers marked and labeled according to U.S. DOT	(f) (1) (i)
X				Containers of 100 gal. or less marked with required PA label	(f) (1) (i)
		X		Placards offered to transporter	(f) (2)
X				Wastes accumulated on-site for less than 90 days	(g) (1)
X				Wastes stored in proper containers and properly marked and labeled	(g) (1) (i)
X				Containers managed in accordance with 75.265(g)	(g) (1) (i)
X				Containers clearly marked with accumulation date and visible for inspection	(g) (1) (i)
		X		Records retained at designated location for 20 years	(h)
		X		Quarterly reports submitted to the Department	(i)
		X		Exception reporting procedures followed	(j)
		X		Hazardous waste disposal plan, if required	(l)
		X		Spill reporting procedures followed	(m) (1)
		X		Preparedness, Prevention and Contingency Plan approved and implemented	(m) (5)
		X		Special requirements followed for international shipments	(o)

HAZARDOUS WASTE INSPECTION REPORT
Part C - Comments

Date of inspection 2/24/91 Identification number PAD # 005018256
Company, Installation name Kingsman Color Works, Inc.
County York Municipality CITY OF YORK

Kingsman Color Eliminated The Hazardous (K-002) Constituents (Lead, Chromium) Used In producing Yellow Pigments Just Before 11/17/89. Organic pigments which are now being used; However, 10 drums of K-002 sludge were generated before 11/17/89, but still are primarily stored inside. The waste in these drums will be analyzed and disposed of, requiring DEP approval. Kingsman Color Works intends to send the new pigment waste to the same place to show that it is not hazardous. Results will be sent to DEP for Review and Decision. This Report Is Concerned primarily with the hazardous waste in the 10 drums generated before 11/17/89. These drums should be properly labeled, and this date of Accumulation marked on each drum.

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 forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) _____ Date _____

Inspector (signature) [Signature] Date 2/24/91

PAD 003018256

INDUSTRIAL WASTE REPORT

Generator Information
Form No. 1

County: York

Facility Name & Address: L.Y. ZIMMER WORKS Inspector: [Signature]

151 W. Gay Avenue

Date: 10/1/07

York, Pa. 17403

Location:

83 South 70 Street, Cross Codorus Creek, 3rd St.
Down Alley to End, on Right.

Individual Contacted & Position:

Robert F. Homan

Number of Employees:

Manufactured Products:

SIL 2865 - Organic pigments

SIL 286 - Inorganic pigments

Number of Waste Streams: 3, Quantity is Phenols & Nitrocellulose Industrial
Waste.

Types of Wastes Produced (Use Form No. 2):

K-002 - Industrial Waste 1-15 - Industrial

K-004 - Industrial Waste

Waste Storage Methods:

all stored all K-001 waste in 10' x 10' x 10' storage area. Waste is not stored in
 10' x 10' x 10' storage area. Waste is not stored in
 10' x 10' x 10' storage area. Waste is not stored in
 Area appears to be adequate.

Frequency of Disposal:

K-001

5,000 lbs/yr

U-100

K-002

100 lbs (Industrial Waste)

(Industrial Waste)

Earliest Information (If Applicable):

Date 10/1/07

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF SOLID WASTE MANAGEMENT

Yach City
Cory, in the

INSPECTION REPORT

Site ID # F4D.CC.XD.8256 License # _____
 Site Name: Kaylene's Auto Works, Inc. Phone # (717) 651-7541
 Address P.O. Box 1744
 City York State PA Zip Code 17404
 Municipality York City County York
 Responsible Official Robert S. Ruppel Title Criminal Manager
 Person Interviewed Robert S. Ruppel, ~~Richard Peters~~ Title "
Kimmy Massenhauer Chief Chemist
 Inspector S. Love

Inspection Type

(Generator Only)

- | | | | | |
|-----------------|-----------------|---------------|---|---|
| 01 Routine | 11 Part B | 51 Routine | Hazardous <input checked="" type="checkbox"/> | Treatment <input type="checkbox"/> |
| 04 Follow Up | 12 Complaint | 54 Follow Up | Residual <input type="checkbox"/> | Storage <input type="checkbox"/> |
| 05 Crit Stage | 13 Withdrawn | 56 Sample | Municipal <input type="checkbox"/> | Disposal <input type="checkbox"/> |
| 06 Sample Only | 14 Closure | 60 Survey | | Generator <input checked="" type="checkbox"/> |
| 07 Permitting | 15 Post Closure | 62 Complaint | | Processing <input type="checkbox"/> |
| 08 Superfund | 50 Record Rev | 70 Record Rev | | Surface App <input type="checkbox"/> |
| 09 Ground Water | 99 Other | 98 Other | | Transporter <input type="checkbox"/> |
| 10 Survey | | | | |

Site ID #		PAD003018256		On-Site Start Time _____	
				On-Site End Time _____	
				On-Site Total Time _____	
Due Date	Inspection Date	Type	Inspector ID #	# Violation	Enforcement
11/1/00	05/25/06	SIG	2325		
Comment Dechlorination Technology					
Sample # Low		Sample # High			
Monitoring Points Sampled					

HAZARDOUS WASTE INSPECTION REPORT
Generators - Part A

Date of inspection May 22, 1986 Time start 9:30 am Time finish 12:30 pm
Name of inspector S. L. Nye
Company, installation name Keystone Color Works
Location 151 W. Gay Avenue
County York Municipality York City
Identification number PAD 003018256
Name of responsible official Robert C. Rehner
Title Research & Development
Mailing address 151 W. Gay Ave.
Area code and phone no. (717) 854-9541
Name of person interviewed Robert C. Rehner and Randy Masenheimer
Title General Manager + Chief Chemist
Mailing address (if different from above) Same
Area code and phone no. _____

2. 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

3. Amount of hazardous waste produced:

- a. _____ kg./mo.
b. _____ kg./yr.

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

possibly none--are in the process of determining if these wastes are non-haz.

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

Comments:

The sludge tanks are cleaned once a year and ~ 4,000 lbs of sludge will be produced. They no longer use pigment that contain lead and chromium, therefore will have more or very little amounts of lead & chrome. (since 1974)

K002 } no longer do this w/w treatment sludge from production of chrome yellow & nitro-pigment
K007 } w/w treatment ^{sludge} from production of iron blue pigments
~~P077~~ - paracitronalene → is recycled in the process and never will end up in the waste sludge

U188 - phenols - not used as a preservative anymore
a type of preservative called Dowicide - A is used now - contains some type of phenolic but not straight phenol.

There are about 16,53 gal. drums of sludge from the treatment process stored since Oct. of 1985.
~~August of 1985~~: these analysis of this sludge will be examined by an chemist to determine if the sludge can be disposed of as a residual non hazardous waste.

Last shipment of waste ^{sludge} Radiols ~~from~~ was in Oct. 1984 to Geo International, Inc. in New York by DLT Transportation Specialists, Inc.

DLT will contact you soon to let you know if you can be considered exempt from our hazardous waste generator, MSD requirements & regulations soon.

Note: Sent 4 samples of sludge + other info to Paul P. Smith to make a determination on 8-7-86.

Person Interviewed: Robert C. Johnson

Date: 5-22-86

Interviewer's Signature: Thomas Lane



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES

Bureau of Waste Management

P.O. Box 8550
Harrisburg, PA 17105-8550
July 1, 1992

(717) 783-9258 *Linda Polk*

Certified Mail No. *7089523 848*

PAD003018256
KEYSTONE COLOR WORKS INC
151 W GAY AVENUE
YORK, PA 17403

RE: 1991 BIENNIAL HAZARDOUS WASTE REPORT

NOTICE OF VIOLATION

Dear Sir/Madam:

The site identified by the above EPA ID Number is on record as a Large Quantity Generator (LQG) of hazardous waste. As a result of the LQG status of your site the Department of Environmental Resources mailed the "1991 Hazardous Waste Report; Instructions and Forms" to the above address in December 1991.

A site receiving the reporting booklet was instructed to complete the report even if the site was not an LQG in 1991. A public notice also appeared in the Pennsylvania Bulletin on February 15, 1992 (Volume 22, No. 7) with the same instruction.

To date the Department has not received a response from your site. The Department thus considers the above site in violation of Section 403 (b)(7) of the Solid Waste Management Act, 35 P.S. Section 6018.403 (b)(7) and Section 262.43 of the Rules and Regulations of the Environmental Quality Board promulgated thereunder, 25 PA Code Section 262.43.

In order to abate the violation, it is recommended that the above site forward the required report to the Department as soon as possible, but in no case later than July 15, 1992.

Failure to abate the above cited violation could subject the above site to additional enforcement action by the Department.

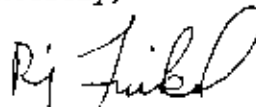
This Notice of Violation does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of the law arising prior to or after the issuance of this Notice or the conditions upon which this Notice is based. This Notice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



Resources.

Should you have any questions regarding this Notice, please contact Linda Polk at the above number.

Sincerely,

A handwritten signature in dark ink, appearing to read "R. J. Finkel". The signature is fluid and cursive, with the first name "R. J." and the last name "Finkel" clearly distinguishable.

Robert J. Finkel
Solid Waste Program Specialist
Information Management Section
Division of Waste Minimization
and Planning



KEYSTONE COLOR WORKS, INC.

151 WEST GAY AVENUE

P.O. BOX 1984

YORK, PA.

17405

July 14, 1992

Ms. Linda Polk
PA Department of Environmental Resources
Bureau of Waste Management
P.O. Box 8550
Harrisburg, PA 17105-8550

RE: PAD003018256 1991
Biennial Hazardous Waste Report

Dear Ms Polk:

We are not a Large Quantity Generator (LQG) of hazardous waste and have not been for over 14 (fourteen) years.

All our plant waste water and residues including, off grade material and that from our laboratory all flow into a central collection tank and then are pumped to three large waste water treatment tanks. The suspended solids are precipitated out using alum and the pH adjusted to 6.5 - 8.0 range. After separation via settling the liquid portion is run into the city waste water system (monitored by the city monthly), and the processed as normal at their treatment facility.

The remaining sludge is pumped out once or twice a year by Eldredge Inc. and treated at DuPont's Deepwater New Jersey plant. Only sanitary waste goes directly to the city system without treatment.

As you are no doubt aware, DuPont will not accept material for treatment at the Deepwater unit unless it is low in organic and heavy metals content. DuPont has been accepting our waste water sludge for over three years with no problems.

I hope this letter clarifies our waste handling and treatment process but should you have any questions or need further information please contact me

I am enclosing my card for this purpose.

Very Truly Yours,

KEYSTONE COLOR WORKS, INC.

Robert C. Rohrer - Gen. Mgr.

RCR:ss

York Boro
inspect
H.W.

EVALUATION - VIOLATION - ENFORCEMENT FORM

Handler ID Number		Handler Type	
P: A D O 0 3 0 1 8 2 5 6		LDF [] TSF [] INC [] LGG [] SQG [] CEG [] TRA []	
Handler Name		Contact Name	Date Submitted
Keystone Color Works		David Cramer	
Street	City		
West Gay Ave	York		

EVALUATION	Add <input checked="" type="checkbox"/>	Change <input type="checkbox"/>	Delete <input type="checkbox"/>
Date	Number	Agency	Type
0830914		S	CEI

AREAS OF EVALUATION (E - Evaluated NE - Not Evaluated NA - Not Applicable)

GER	GPT	GBF	TWD	DGS	DLT	DPB	DWP
GGR	GRR	TGR	DCH	DGW	DMC	DPP	DBF
GLB	GSC	TMR	DCL	DIN	DMR	DSI	CAS
GMR	GSQ	TOR	DCP	DLB	DOR	DTR	FEA
GOR	GEX	TRR	DFR	DLF	DOT	DTT	CSS

Comments: Facility NO LONGER GENERATES HAZARDOUS WASTE

OUTSTANDING VIOLATIONS COVERED BY ABOVE EVALUATION

Agency	Number	Area	Date Determined	Agency	Number	Area	Date Determined

VIOLATION		Add <input type="checkbox"/>	Change <input type="checkbox"/>	Delete <input type="checkbox"/>	Link to Above Evaluation? (Y/N)	
Agency	Number	Area	Class	Regulation Type	Regulation Citation	
Date Determined		Priority	Branch	Person	Returned to Compliance Scheduled Actual	
Comments						

VIOLATION		Add <input type="checkbox"/>	Change <input type="checkbox"/>	Delete <input type="checkbox"/>	Link to Above Evaluation? (Y/N)	
Agency	Number	Area	Class	Regulation Type	Regulation Citation	
Date Determined		Priority	Branch	Person	Returned to Compliance Scheduled Actual	
Comments						

☐ Required ☐ Required if pertinent ☐ Required only for previously reported data ☐ Not Required by EPA

Handler ID Number				Handler Name			
<div style="display: flex; justify-content: space-between;"> VIOLATION Add Change Delete Link to Above Evaluation? (Y/N) </div>							
Agency	Number	Area	Class	Regulation Type	Regulation Citation		
<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>		
Date Determined		Priority	Branch	Person	Returned to Compliance Scheduled		Actual
<input type="text"/>		<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>		<input type="text"/>
Comments							

<div style="display: flex; justify-content: space-between;"> VIOLATION Add Change Delete Link to Above Evaluation? (Y/N) </div>							
Agency	Number	Area	Class	Regulation Type	Regulation Citation		
<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>		
Date Determined		Priority	Branch	Person	Returned to Compliance Scheduled		Actual
<input type="text"/>		<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>		<input type="text"/>
Comments							

<div style="display: flex; justify-content: space-between;"> VIOLATION Add Change Delete Link to Above Evaluation? (Y/N) </div>							
Agency	Number	Area	Class	Regulation Type	Regulation Citation		
<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>		
Date Determined		Priority	Branch	Person	Returned to Compliance Scheduled		Actual
<input type="text"/>		<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>		<input type="text"/>
Comments							

<div style="display: flex; justify-content: space-between;"> ENFORCEMENT Add Change Delete </div>							
Date	Number	Agency	Type	Branch	Person	Attorney Initials	
<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	
Penalty Assessed \$				Settled \$			
<input type="text"/>				<input type="text"/>			

POLLUTION PREVENTION ENFORCEMENT COMPONENTS COVERED BY THIS ACTION

PPE - Pollution Prevention <input type="checkbox"/>	EAE - Environmental Auditing <input type="checkbox"/>
PRE - Pollution Reduction <input type="checkbox"/>	EPE - Environmental Public Awareness <input type="checkbox"/>
ERE - Environmental Restoration <input type="checkbox"/>	

VIOLATIONS COVERED BY ABOVE ENFORCEMENT ACTION

Agency	Number	Area	Date Determined	Agency	Number	Area	Date Determined
<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

PENALTY PAYMENTS

Date	Amount	Date	Amount
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

Comments

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART A

Date of Inspection Aug 30, 1994 Time start 1:00 pm Time finish 3:00 pm
Name of Inspector Crystal Swook
Company, installation name Keystone Color Works, Inc.
Location 151 West Gay Ave, York PA
County York Municipality York Boro
Identification number PAD603018236
Name of responsible official DAVID CRAMER
Title GENERAL MANAGER
Mailing Address 151 West Gay Ave, York PA 17403
Area code and telephone number (717) 854-9541
Name of person interviewed Ed Mecier
Title Superintendent
Mailing address (if different from above) SAME
Area code and telephone number _____

1. Current waste handling method: N/A

- a. ☐ On-site ☐ treatment, ☐ storage, ☐ disposal ☐ PBR
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. N/A (NONE) kg./mo.
b. _____ kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
<u>N/A</u>	<u>N/A</u>	<u>N/A</u>

4. Source Reduction: ☐ accomplished, ☐ proposed, ☐ not proposed N/A

Commonwealth of Pennsylvania
Department of Environmental Resources
Bureau of Waste Management

Inspection Report Comments

The Department conducted a hazardous waste inspection of Keystone Color Works. Present during the inspection were Crystal Snook (DER) and David Cramer (Keystone.)

The Department inspected the facility. According to Cramer, the facility does not and has not generated hazardous waste since October 1990. The Department reviewed the MSDS sheets for material used and current analysis on the sludge produce on site. According to this paperwork, Keystone Color Works does not generate hazardous waste.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements. This inspection report is official notification that a representative of the Department of Environmental Resources, Waste Management Program, inspected the facility installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations. This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from any action for any violation noted herein. Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (Signature) _____

Date _____

Inspector (Signature) Crystal Snook

Date 9/30/94



24 Hour Service
1604 Bush Street
Baltimore, MD 21230
(410) 685-3910
Fax (410) 244-8210

BEVERLY O'CONNOR
Account Manager

"People and Technology Creating a Better Environment"

ANALYSIS OF SAMPLE ACCEPTED INTO CLEVELAND FACILITY

GENERATOR: KEYSTONE COLOR WORKS
Profile#: U06113 CUSTOMER: KEYSTONE COLOR WORKS
VOLUME: 4000 GALLON/QUARTER
DESCRIPTION: INDUSTRIAL WASTE (PIGMENT MFG.)
DATE: 09/14/93

ANTIMONY, as mg Sb/L:	N/A
ARSENIC, as mg As/L:	<0.20
BARIUM, as mg Ba/L:	45.76
BERYLLIUM, as mg Be/L:	<0.20
CADMIUM, as mg Cd/L:	<0.01
CHROMIUM, Hexavalent, as mg Cr+6/L:	N/D
CHROMIUM, Total, as mg Cr/L:	<0.20
COPPER, as mg Cu/L:	170.3
IRON, as mg Fe/L:	9037.0
LEAD, as mg Pb/L:	81.96
MERCURY, as mg Hg/L:	<0.005
NICKEL, as mg Ni/L:	<0.20
SELENIUM, as mg Se/L:	<0.20
SILVER, as mg Ag/L:	<0.20
THALLIUM, as mg Tl/L:	<0.3
ZINC, as mg Zn/L:	109.7
FLASHPOINT:	>140F
CHLORIDES, as mg Cl/L:	N/A
CYANIDES, Total, as mg CN/L:	<5.0
CYANIDES, Amenable, as mg CN/L:	N/A
pH, in S.U.:	7.7
SULFIDES, as mg S=/L:	<50.00
ALDEHYDES, as mg ALD/L:	Neg
FORMALDEHYDES, as mg FORM/L:	N/A
C.O.D., as mg COD/L:UPON TREATMENT	4800.00
M.B.A.S., as mg L.A.S./L:	N/A
PHENOLS & CRESOLS, as mg C6H5OH/L:	<10.0
OIL & GREASE, as mg/L:	N/A
SOLIDS, Total, as mg/L:UPON TREATMENT	N/A
SOLIDS, Suspended, as mg/L:UPON TREATMENT	132.05
AMMONIA, as mg NH3/L:	<100.0

EVALUATION - VIOLATION - ENFORCEMENT FORM

04/95 VERSION

Handler ID Number Page 3

P: A: D: 0: 0: 3: 0: 1: 8: 2: 5: 6

Contact Name

DAVID CRAMER

RESERVED FOR
EPA USE

Handler Name

Keystone Color Works

Street

151 West Gay Ave

City

York

UNIVERSE CHANGE REQUIRED Page 4 YES ☒ NO ☐

I. Indicate the facility's current universe(s):

TSD

II. Indicate the new transporter status (Mark here only if the facility requires a transporter status change):

II. Indicate the new RCRIS Generator Universe (mark only one):

LQG ☐ CEG ☐ NON-HANDLER ☒
SQG ☐ CLOSED ☐

NOTE: All TSD activity changes must be handled by the state data coordinator and cannot be made using this form

Transporter ☐

If the transporter box is checked, you must check at least one of the boxes below:

Mark Mode of Transportation

☐ Air ☐ Water
☐ Rail ☐ Other
☐ HighwayNon-Transporter ☐

Check this box if the facility is currently listed in RCRIS as a transporter and no longer transports hazardous waste.

EVALUATION Add ☒ Change ☐ Delete ☐ Page 5

Date	Number	Agency	Type	Reason	Branch	Person
09/27/96		S	CEI			

AREAS OF EVALUATION (E - Evaluated NE - Not Evaluated NA - Not Applicable)

GGR	GSC	TWD	DGW	DOR	DWP	BRR	FEA
GLB	GSQ	DCH	DLB	DPB	DIN	BPS	CSS
GMR	GEX	DCL	DLF	DPP	DIA	BIS	
GOR	TGR	DCP	DLT	DSI	DPS	BCE	
GPT	TMR	DFR	DMC	DTR	DOP	BDT	
GRR	TOR	DGS	DMR	DTT	DMI	CAS	

Comments Facility no longer generates HAZARDOUS waste, never a TSD

OUTSTANDING VIOLATIONS COVERED BY ABOVE EVALUATION Page 5

Agency	Number	Area	Date Determined	Agency	Number	Area	Date Determined

VIOLATION Add ☐ Change ☐ Delete ☐ Link to Above Evaluation? (Y/N)

Agency	Number	Area	Class	Regulation Type	Regulation Citation	Date Determined	Priority	Branch	Person	Returned to Compliance Scheduled	Returned to Compliance Actual

Comments

☐ Required ☐ Required if pertinent ☐ Required only for previously reported data ☐ Not Required by EPA

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT - RESIDUAL WASTE GENERATOR

Generator I.D. # P A D O C 3 0 1 5 2 5 6Telephone # (717) 854-1541Site Name Keystone Color WorksOperator Name Keystone Color WorksSite Address 151 West Gay Ave.
York, PAAddress (same)Municipality York BoroCounty YorkResponsible Official DAVID CRAMERTitle Gen. ManagerPerson Interviewed DAVID CRAMERTitle Gen. ManagerInspector DERRICK HAVICETime 2:00 pm

Inspection Date

Inspection Type

Inspector I.D. #

Violation

0 1 2 6 9 60 12 3 0 4

INSPECTION TYPE

01 Routine

04 Follow Up

07 Complaint

02 Spill Response

05 Sampling Only

08 Record Rev

03 Remedial Action

06 Ground Water

09 Other

Comment Routine InspectionWaste Description: NON HAZ/NOT REGULATED WATER INKWaste Code: Treatment ☐ Yes ☒ No Type Type of Storage: Containers Tanks Piles ☒ ImpoundmentsDisposition: Destination Facility Location Type Amount Generated: 5000 g/year ~~lb./mo.~~Waste Description: Waste Code: Treatment ☐ Yes ☐ No Type Type of Storage: Containers Tanks Piles ImpoundmentsDisposition: Destination Facility Location Type Amount Generated: lb./mo.Waste Description: Waste Code: Treatment ☐ Yes ☐ No Type Type of Storage: Containers Tanks Piles ImpoundmentsDisposition: Destination Facility Location Type Amount Generated: lb./mo.

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Generator Name Keystone Color Works
Date 9/26/96

INSPECTION REPORT - RESIDUAL WASTE GENERATOR

1 = No Violation Observed 2 = Not Applicable 3 = Not Determined 4 = Non-Compliance

Chapter Citation	Requirement	Status				Line Number
		1	2	3	4	
25 Pa Code	GENERAL PROVISIONS					
87.6	Designated facility: valid permit? Permit Number (PA) _____	1				3001
287.52(a)	Biennial report submitted by March 1 of each odd numbered year.			3		3002
87.53	Written source reduction strategy on file and in effect.				4	3003
87.53(b)	Waste reduction strategy covers all waste streams.				4	3004
287.53(c)	Reduction strategy updated every five years or when waste or manufacturing process changes.				4	3005
87.54	Waste analysis performed: copy on file.				4	3006
287.54(b, f)	Annual analysis or certification of waste submitted to Department and designated facility.				4	3007
87.55	Small quantity generator record keeping requirements.		2			3008
287.101(a)	Operation of disposal or processing facility without a permit.	1				3009
	STORAGE REQUIREMENTS					
299.111(1)	Residual waste not mixed with hazardous waste.	1				3010
99.111(2)	Waste stored as not to create a safety risk.	1				3011
99.111(3)	Residual waste not mixed with special handling waste.	1				3012
299.111(4)	Waste not blown or otherwise deposited outside storage area.	1				3013
99.112(c)	Storage area inspected; records available.			3		3014
299.113(a)	All waste stored less than one year.			3		3015
299.114(a)	Equipment maintained in operable condition.	1				3016
99.114(c)	Equipment cleaning frequencies maintained.	1				3017
299.115	Vectors controlled and public nuisances prevented.	1				3018
99.116(a)(b)	Run on, runoff minimized; storage areas managed in accordance with Clean Streams Law.	1				3019
299.116(c)	Waste stored to prevent groundwater degradation.	1				3020
99.121	Sufficient number of properly constructed storage containers.	1				3021
99.122	Storage tank design standards.	1				3022
299.112(d), 99.131(b)	No putrescible waste or liquid waste stored in piles.	1				3023
299.131	Waste storage pile area properly designed, constructed and maintained.	1				3024
99.132	Storage pad or liner system properly designed and maintained.	1				3025
299.133	Proper design and maintenance of leachate and runoff control systems.	1				3026
99.151	Proper storage and containment of incinerator ash residue.		2			3027
299.152	Proper storage and containment of friable asbestos containing waste.		2			3028
99.153	Proper storage and containment of coal ash.		2			3029
299.154	Proper storage and containment of PCB containing waste material.		2			3030

Commonwealth of Pennsylvania
Department of Environmental Protection
Bureau of Waste Management
Inspection Report Comments

The Department conducted a routine hazardous and residual waste inspection at Keystone Color Works. Present for the Department was Derrick Havice, Tom Hanlon, and John Lundsted. Present for Keystone Color Works was David Cramer the General Manager. Keystone Color Works produces pigment and dispersions for the printing industry.

Mr. Cramer at the beginning of the inspection stated that Keystone Color Works no longer produces hazardous waste since the early 1980's when Keystone switched manufacturing processes (see attached). Mr. Cramer stated also that Keystone Color Works was never a TSD facility.

The Department inspected the mixing tanks, presses, and water treatment system. David Cramer considers Keystone Color Works as a Small Quantity Generator of residual waste. According to Keystone's records they produces approximately 5500gal of sludge per year and ship sludge offsite at least once a year from the water treatment system.

The Department observed that the amounts of waste generated by Keystone Color Works places Keystone Color Works into the Large Quantity Generator status for residual waste. As a Large Quantity Generator Keystone Color Works needs to complete a written Source Reduction Strategy for all waste streams per Chapter 287.53 of the Rules and Regulations of the Department. Keystone Color Works also needs to perform and submit to

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily implicate concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (signature) mailed

Date 10/5/96

Inspector (signature) Derrick Havice

Date 10/2/96

Commonwealth of Pennsylvania
Department of Environmental Protection
Bureau of Waste Management
Inspection Report Comments

the Department detailed chemical analysis of the waste per Chapter 287.54 of the Rules and Regulations of the Department. A copy of this chemical analysis needs to be maintained on site and available to the Department for inspection. Keystone Color Works needs to submit to the Department the 1994 Biennial Report due March 1, 1995 per 287.52(a) of the Rules and Regulations of the Department.

Keystone Color Works is currently in violation of Chapters 287.52, 287.53, and 287.54 of the Rules and Regulations of the Department. In order to achieve compliance, with the Rules and Regulations of the Department, the Department recommends: 1) within 30 days a written Source Reduction Strategy be completed for all waste streams 2) within 30 days detailed chemical analysis be performed on all waste streams 3) within 30 days complete the 1994 Biennial Report due March 1, 1995 and send a copy to PADEP, Bureau of Waste Management, P.O. Box 8550, Harrisburg, PA 17105-8550 4) within 45 days copies of the Source Reduction Strategies, chemical analysis, and the 1994 Biennial Report be forwarded to PADEP, ATTN: Derrick Flavice, 1 Ararat Blvd., Harrisburg, PA 17110.

The time frames stated above are only suggested. Please contact the Department if additional time is needed.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning other violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (signature) mailed

Date 10/8/96

Inspector (signature) [Signature]

Date 10/8/96

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT



GENERAL INSPECTION REPORT

Type of Inspection Survey	WM Identification Number NA	Entry Time/Date 2:00 PM/5-29-2002	Exit Time/Date 2:45 PM/5-29-2002
Facility/Incident Name and Location Keystone Color Works, Inc., 151 West Gay Ave. York, PA 17403			Municipality York City
			County York
Name, Address of Responsible Official Mr. David A. Cramer P.O. Box 1984 York, PA 17405		Title General Manager Telephone/Fax 717-854-9541/5867 Interviewed <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

REMARKS:

The Department conducted an announced inspection and the following were noted:

1. This facility has been operational for 80 years in color pigmentation production.
2. Observed inside the facility on the third floor were nearly 300 hundred various-sized containers from 5 gallon pails to 55 gallon drums of solid waste materials related to paint pigment production. Mr. Cramer noted that the drums of waste had been at the facility for more than one year. Consequently it was explained that the storage of a solid waste beyond one year constitutes disposal and therefore requires a permit from the Department.
3. Mr. Cramer explained that all of the waste had been recently profiled and a list of the materials was provided. Some of the wastes proved to be hazardous waste. Disposal options such as landfilling or incineration were discussed with Mr. Cramer for the residual type wastes.
4. It was recommended that all of the drums of waste be disposed of at a permitted disposal facility and copies of the disposal manifests/receipts be forwarded to this Program within 120 days.
5. It was recommended that the York City Fire Department be notified of the presence of the drums inside the facility. Further recommend that the building be secured when no one is present.
6. A re-inspection will be conducted to ensure compliance with Department regulations.

VIOLATIONS: PA Solid Waste Management Act, Section 6018.610 (2): Operation of a solid waste disposal facility without a permit from the Department.

Sample Collected <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Sample Numbers	Analyses	
Inspector Name David Hrobuchak and John Spang		Inspector Signature <i>D. M. Hrobuchak</i>	Headquarters SCRO Harrisburg Date 5/29/2002 Telephone 717.705.4954
Person Interviewed Name David Cramer		Signature of Person Interviewed Mailed	Title G.M. Date NA Telephone Above

This document is official notification that a representative of the Department of Environmental Protection inspected the above-mentioned facility. The findings of the inspection are shown above and on any attached pages. Violations discovered as a result of this inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses, review of pertinent documents and further investigation. Notification will be forthcoming if such violations are discovered.

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT



GENERAL INSPECTION REPORT

Type of Inspection Follow-up	WM Identification Number PAD003018256	Entry Time/Date 2:00 PM/10-17-2002	Exit Time/Date 2:30 PM/10-17-2002
Facility/Incident Name and Location Keystone Color Works, Inc., 151 West Gay Ave, York, PA 17403			Municipality York City
			County York
Name, Address of Responsible Official Mr. David A. Cramer P.O. Box 1984 York, PA 17405		Title General Manager Telephone/Fax 717-854-9541/5867	
		Interviewed <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

REMARKS:

The Department conducted an unannounced re-inspection and the following were noted:

1. This facility has been operational for 80 years in color pigmentation production.
2. Previously observed on the third floor of the building were nearly 300 hundred various-sized containers from 5 gallon pails to 55 gallon drums of out-dated materials related to paint pigment production.
3. On 9/20/02 a summary was provided to the Department that detailed the disposition of the containers of waste materials.
4. On 10/17/02 a walk through of the third floor showed that no obvious waste materials were left behind.
5. Case closed this date. No further action required.

VIOLATIONS: None

Sample Collected <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Sample Numbers	Analyses	
Inspector Name D.M. Hrobuchak and S. Martin	Inspector Signature 	Headquarters SCRO Harrisburg	Date 10/24/2002 Telephone 717.705.4954
Person Interviewed Name Warehouse manager	Signature of Person Interviewed Mailed	Title Warehouse mgr.	Date NA Telephone Above

This document is official notification that a representative of the Department of Environmental Protection inspected the above-mentioned facility. The findings of the inspection are shown above and on any attached pages. Violations discovered as a result of this inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses, review of pertinent documents and further investigation. Notification will be forthcoming if such violations are discovered.

R-585-6-9-28

ENVIRONMENTAL PRIORITIES INITIATIVE
PRELIMINARY ASSESSMENT OF
KEYSTONE COLOR WORKS, INCORPORATED
PREPARED UNDER

TDD NO. F3-8903-53
EPA NO. PA-2423
CONTRACT NO. 68-01-7346

DER
WASTE MANAGEMENT

OCT 02 1989
HARRISBURG REGION

FOR THE

HAZARDOUS SITE CONTROL DIVISION
U.S. ENVIRONMENTAL PROTECTION AGENCY

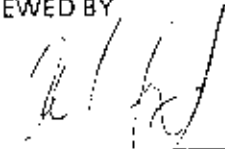
SEPTEMBER 1, 1989

NUS CORPORATION
SUPERFUND DIVISION

SUBMITTED BY


MICHAEL MCCARTHY
PROJECT MANAGER

REVIEWED BY


ANDREW FREBOWITZ
SECTION SUPERVISOR

APPROVED BY


GARTH GLENN
REGIONAL OPERATIONS
MANAGER, F1T 3

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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. F3-8903-53 for the Keystone Color Works, Incorporated site, located in York, York County, Pennsylvania.

1.2 Scope of Work

NUS FIT 3 was tasked to conduct an Environmental Priorities Initiative (EPI) preliminary assessment of the subject site.

1.3 Summary

The site is the location of a three-story warehouse, located on approximately one acre of land in York, York County, Pennsylvania. Keystone Color Works has been in operation since the early 1920s, manufacturing organic and inorganic pulp pigments for the wallpaper and surface-coating trades. However, from the 1940s through the 1970s, Keystone produced, in addition to various other colors, a chrome yellow and molybdate orange colorants. These pigments contained both lead and chromium, elements considered to be hazardous. This material appeared in Keystone's wastewater sludge in excess of the maximum allowable limits permitted by EPA. As a result, Keystone was classified as a hazardous waste generator. These materials are no longer utilized by the facility.

Keystone's processes consist of blending and mixing raw materials in numerous 300-gallon wooden barrels located on the second floor of the warehouse. The material is allowed to settle out into two phases. Clear water is drawn off the top of the various tanks and pumped into one of four large settling tanks. This water contains sodium sulfate and sodium chloride. The lower product is gravity fed into additional tanks on the lower floor for further processes. Wastewater is treated using alum, and the pH is balanced between 6.0 and 9.0. The material is allowed to settle out once again. The liquid phase is pumped directly into the city sewer system upon settlement. Before 1986, the solid phase was pumped into filter press machines; residue was disposed into 55-gallon drums. This sludge contained the hazardous wastes that Keystone reported in its permit applications.

Keystone reportedly produced approximately 5,000 pounds of sludge per year. The drums were disposed at the Old York County Landfill between 1961 and 1974. After 1974, the drums were disposed at York Landfill until November 1980. No Pennsylvania Department of Environmental Resources (PA DER) approval was granted for such disposal. Keystone was requested to cease the disposal and have the sludge analyzed.

Because of the problems with the hazardous nature of the chrome and orange pigment, Keystone ceased manufacturing these pigments in the early 1980s. Wastewater is still treated the same; however, the filter press is no longer used and has been dismantled.

Wastewater sludge generated between 1981 and mid-1987 was sent to CECOS International, Incorporated in New York for treatment and disposal. Currently (since mid-1987), Keystone utilizes Eldredge, Incorporated to transport the sludge to a DuPont treatment facility in Deepwater, New Jersey, where it is treated and disposed.

In June 1987, an unauthorized discharge of untreated wastewater was released to Codorus Creek as a result of a malfunctioning float bulb. For a detailed description of this incident, please refer to sections 2.5 and 2.6 of this report.

NUS FIT 3 conducted an EPI preliminary assessment at Keystone Color Works, Incorporated, on April 26, 1989. During this visit, four solid waste management units (SWMUs) were identified: the wastewater treatment storage tanks, the former waste drum storage area, an empty raw materials drum storage area, and the wastewater collection pit. For a detailed description of each of the above-mentioned SWMUs and the wastes managed, please refer to section 4.0 of the report.

The population of the three-mile-radius study area obtains potable water supplies from York Water Company and private domestic wells. Potable water is supplied by surface water and groundwater. York Water Company utilizes an intake along Codorus Creek, 3.3 miles upstream. The nearest private well is located 2-1/2 miles northwest of the site.

2.0 THE SITE

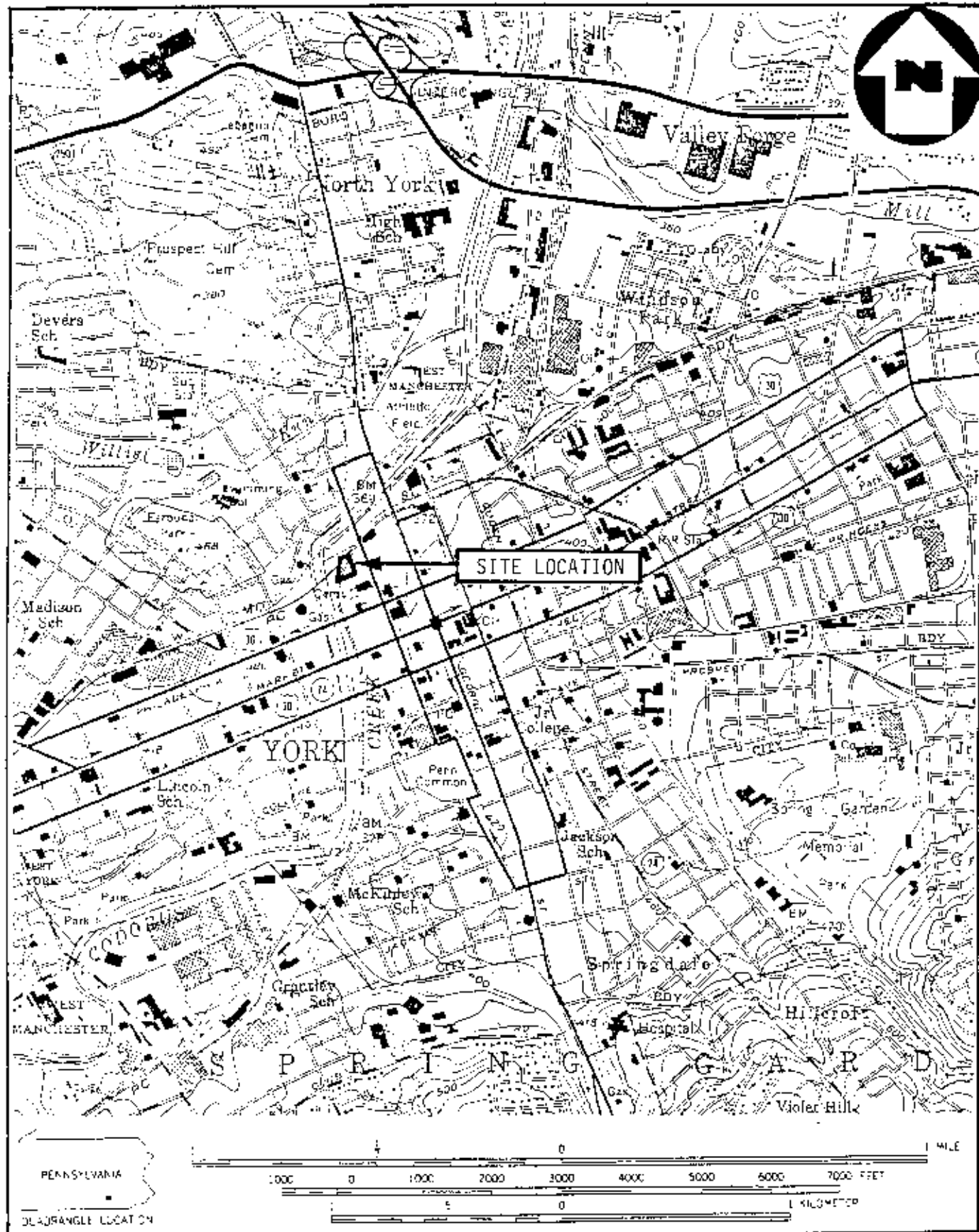
2.1 Location

The Keystone Color Works, Incorporated site is located in York, Pennsylvania, within the York city boundaries, just north of Philadelphia Street along West Gay Street (see figure 2.1, page 2-2). The coordinates of the site are north 39° 57' 56" latitude and west 76° 44' 10" longitude. The site may be located on the United States Geological Survey (U.S.G.S.) York, Pennsylvania quadrangle topographic map by measuring 6-1/4 inches south and 2-1/2 inches east from the northwestern corner of the quadrangle.¹

2.2 Site Layout

The facility is a three-story building located on one acre of land. The property is bordered on the west and north by railroad tracks, on the south by West Gay Avenue and businesses, and on the east by an apartment building and Beaver Street. Codorus Creek, which parallels the railroad tracks, is approximately 100 yards from the facility at its closest point. A storm water drain from the facility flows northwardly to Codorus Creek.^{1,2}

The facility comprises six main areas (see figure 2.2, page 2-3). Area no. 1, in the southwestern corner of the facility, is approximately 129 by 76 feet in size and contains offices and some raw material storage on the upper floor. The lower floors of this area are utilized for shipping and receiving. Area nos. 2 and 3 are the production areas: they are located in the central portion of the western wing of the facility. Area no. 2 is approximately 100 by 48 feet in size, and area no. 3 is approximately 70 by 38 feet in size. Approximately 15 to seventeen 300-gallon, wooden mixing tanks, used to blend and mix products, are located on the second floor of area nos. 2 and 3. A six-inch metal drainage collection system runs beneath the series of tanks. This system would contain any accidental spill or overflow during mixing and blending of raw materials. The drainage system will drain any spilled material through a series of hosing to the next phase of processing tanks, located on the lower floor. No harm to the product would arise because of the continuous blending and mixing in the next series of processes. Final product lines are located on the lower floor in these areas.^{1,2}



SOURCE: (17.5 MINUTE SERIES) U.S.G.S. YORK, PA. QUAD

SITE LOCATION MAP
KEYSTONE COLOR WORKS INC
 SCALE 1:24000

FIGURE 2.1



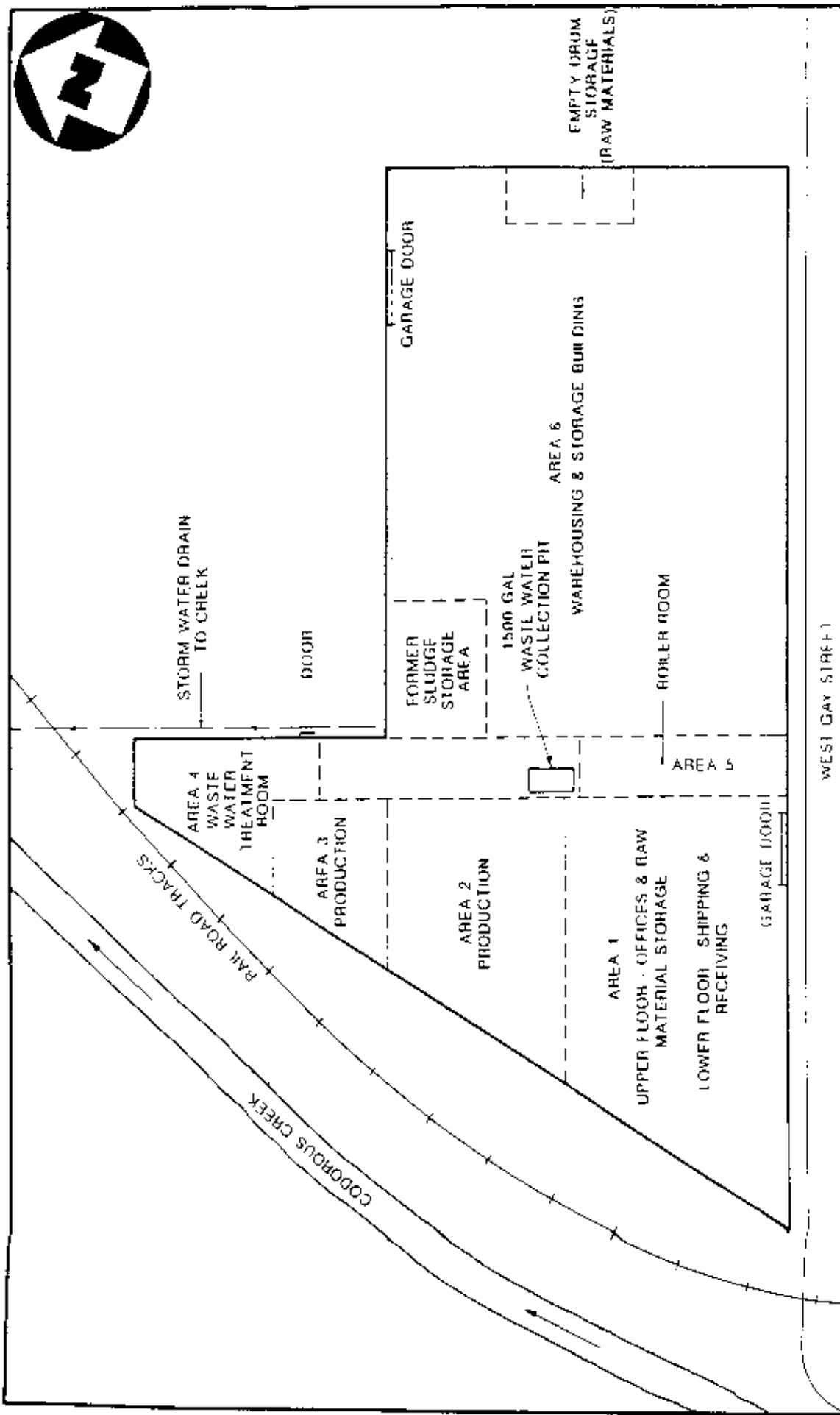


FIGURE 2.2

SITE SKETCH
 KEYSTONE COLOH WORKS INC.
 (NO SCALE)



The facility's wastewater treatment plant is located in area no. 4, in the building's far northern end. This portion of the facility was added in the early 1980s. Area no. 4 contains one 8,000-gallon fiberglass storage tank, two 12,000-gallon fiberglass tanks, and one 2,000-gallon wooden tank. All four tanks have open tops and are placed on a concrete floor with a three-feet-high dike. Wastewater is piped through a series of open trench drains located on the first floor into a collection pit located just north of the boiler room. This concrete-lined collection pit holds 1,000 to 1,500 gallons of wastewater. Wastewater is automatically pumped into one of the four treatment tanks. A boiler room (area no. 5) is located east of the shipping/receiving area. The facility's eastern wing, approximately 141 by 115.5 feet in size, contains area no. 6. The majority of the area is used for warehousing finished products and raw materials. Empty product drums are stored in the southeastern corner of this area. From the 1960s until the 1980s, the drums of sludge, from the wastewater treatment operation, were stored in the northwestern corner of this area.^{1,2}

2.3 Ownership History

The current owner, Herbert R. Euley, purchased the property and began operations in the early 1920s. Keystone Color Works is a family-owned business.³

2.4 Site Use History

The history of the property dates back to the mid-to-late 1850s. According to one long-time factory worker, the property once housed a factory that manufactured the Conestoga wagon. When the train industry evolved, the factory was redeveloped to build box cars. During the early 1900s, the building housed an automobile assembly line. In approximately 1920, Keystone Color Works, Incorporated purchased the building for the purpose of manufacturing paint pigments. Keystone Color remains active today, manufacturing pulp pigments for the wallpaper and surface-coating trades and a small variety of other surface-coating companies.³

2.5 Permit and Regulatory Action History

On July 16, 1980, Keystone Color Works, Incorporated filed a Notification of Hazardous Waste Activity Form with EPA and was assigned EPA Identification No. PAD003018256 on October 9, 1980. The facility also filed a Part A Permit Application and began storing wastes under interim status. Identified wastes that the facility could handle were classified as K002 (chrome pigment sludge), P077 (p-nitroaniline), and U188 (phenol). The process code that the facility could use was identified as S01.^{4,5,6,7,8}

In October 1980, Keystone ceased manufacturing the hazardous waste chrome yellow and molybdate orange colorants. An attempt was made by Keystone to be reclassified from a hazardous waste generator to an industrial waste generator. In February 1984, after determining that the facility would only need to store waste for less than 90 days, Keystone Color Products withdrew its Part A application and remained a small generator.^{4,5,6,7,8,9,10,11,12} (Related correspondence may be found in appendix A.) The facility is also permitted by the York County Sewer Authority to discharge to the sanitary sewer. Only the plant's sanitary wastes and treated wastewater effluent are discharged to the sewer. There have been no reported violations of this permit.³

PA DER file information indicates that the facility has been subject to periodic inspections since at least February 24, 1981. Notices of Violation were issued by PA DER to Keystone Color Works at several of these inspections. These Notices of Violation generally concerned the failure to notify PA DER of the disposal of waste sludge, the failure to use proper manifests, and the failure to properly label drums. During the PA DER inspection on February 24, 1981, it was also reported that the hazardous constituents (lead and chromium) were eliminated from Keystone's processes but that storage of wastes had continued. Waste sludge had been disposed at the Old York County Landfill (1961 to 1974) and York Landfill (1974 to 1980). This was done without PA DER approval. Keystone was ordered to cease disposal, analyze the sludge, and find alternative disposal methods.^{13,14}

On July 29, 1981, Keystone submitted its quarterly report for March 31, 1981 with all the requested information. Samples were taken from drums of sludge stored on site. The report indicates levels below the recommended EPA limits. Keystone accepted the services of CECOS International, Incorporated, located in New York, to treat and dispose the sludge (used from 1981 through mid-1987).^{1,14,15}

In February 1986, Keystone submitted a Notification of Hazardous Waste Activity, requesting that the facility be removed from the hazardous waste generator list and be reclassified as an industrial waste generator. PA DER followed this request on May 22, 1986 with an inspection of the facility. PA DER's findings revealed that K002 and P077 wastes were no longer manufactured. Sludge was still stored on site. Analysis of sludge would be reviewed and a determination made to exempt Keystone from its status as a hazardous waste generator and from the treatment, storage, and disposal (TSO) requirements and regulations (see appendix B for inspection report and related correspondence).^{16,17,18}

The most recent inspection by PA DER, on June 25, 1987, was a result of a reported spill/discharge into Codorus Creek. An inspection of the spill was conducted on June 26, 1987 and a Notice of Violation was issued on August 7, 1987 (see appendix C for inspection report and related correspondence) 19.20

2.6 Remedial Action to Date

One spill has been documented for the site. On June 25, 1987, a floatball clogged, causing an alarm system to malfunction in one of the pretreatment tanks. This malfunction caused the tank to overflow into a floor drain and a floor trench, both of which connect to the storm sewer that carries the flow to Codorus Creek. An unknown quantity of wastewater was discharged. PA DER was informed of the spill and conducted an inspection on June 26, 1987. At the time of their inspection, the problem was resolved and the plant area had been cleaned up. PA DER proceeded to obtain a sample of Codorus Creek at the discharge point into the creek.^{19,20} Sample results can be found in appendix C.

Keystone Color Works has taken the following steps to prevent a recurrence of this problem in the future. All float system alarms have been checked to ensure proper function. Visual inspection of the tank during wastewater collection has been implemented. A containment wall has been constructed around the wastewater treatment tanks. A six-inch line with a vertical three-foot extension was incorporated at the floor drain, and the open trench was cemented shut.²¹ As a result of the discharge, Keystone payed a penalty of \$250.00.²²

3.0 ENVIRONMENTAL SETTING

3.1 Water Supply

Potable water is supplied by surface water and groundwater. One municipal water company and private domestic wells service the area within three miles of the site.²³

The York Water Company services the city of York and the surrounding area. The system obtains its water supply from a surface water intake on the South Branch of Codorus Creek. The intake is located about 3.3 miles southwest of the site. Two impound dams, Lake Williams and Lake Redman, located on the East Branch of Codorus Creek, are utilized in case a water shortage occurs on the South Branch. The lakes are approximately 4.75 miles southeast of the site. They have a combined capacity of 2.5 billion gallons. The York Water Company serves an estimated 130,500 people.^{23,24,25}

The remainder of the population within three miles of the site obtains its potable water from private wells. The majority of the wells are less than 200 feet in depth. All of the formations in the area have aquifer potential.²⁶

3.2 Surface Waters

Codorus Creek, which parallels the railroad tracks, is approximately 100 yards west of the facility at its closest point. A storm water drain from the facility, in the building's far northern end, carries storm water drainage northwardly to Codorus Creek from the facility's roof. At one time, this drain also carried noncontact cooling water and boiler blowdown water; however, because of an accidental spill from the wastewater treatment room, wastewater entered an open trench that carried water to a floor drain, which in turn discharges into Codorus Creek. New construction was undertaken to raise the floor drain above the treatment room's containment wall and to cement the open trench shut. The new construction now accomodates the roof drain only.^{1,2,3}

The nearest surface water intake has been identified outside the study area, 3.3 miles southwest of the site. This intake is along Codorus Creek, which flows in a northward direction through the city of York. Codorus Creek meets Pennsylvania Water Quality Criteria for the protection of warm water and the passage of migratory fish.²⁷

3.3 Hydrogeology

The geologic and hydrogeologic conditions in the study area were researched as part of the site investigation. A preliminary literature review was conducted to determine surface and subsurface geologic conditions, soil character, and the status of groundwater transport and storage.

3.3.1 Geology

The Keystone Color Works, Incorporated site is located in the Conestoga Valley Section of the Piedmont Physiographic Province. The section is underlain chiefly by Cambrian and Ordovician age carbonate rocks and shale that are complexly folded and faulted. Several northeast-southwest-trending thrust faults cut through the study area. The Gnatstown Overthrust cuts through the site. The area is gently rolling, with rounded hills and broad valleys.^{28,29}

The site is underlain by the Ordovician age Conestoga Formation south of the Gnatstown Overthrust and by the Cambrian age Kinzers Formation north of the fault (see figure 3.1, page 3-3). The Conestoga Formation is a gray, thin- to medium-bedded, sandy, impure limestone with thin shale partings and a limestone conglomerate at the base. Its thickness is unknown. The middle, pure limestone member of the Kinzers Formation is present at the site. It is a dark blue to blue-gray crystalline limestone of variable composition. The upper earthy buff limestone member consists of gray-brown to tan, sandy, porous, leached limestone containing dark, argillaceous, and shaly interbeds. The lower shale member of the Kinzers Formation is a dark gray, buff-weathering, iron-stained, fissile shale. The thickness of the Kinzers Formation varies, but it averages about 200 feet.^{28,30}

The Cambrian age Ledger Dolomite underlies the Conestoga Formation and overlies the Kinzers Formation. The formation is composed of light gray to pink, coarsely crystalline, thick-bedded, pure dolomite that has a chert horizon near the top. The thickness is estimated to be about 1,000 feet.³⁰

The Cambrian age Vintage Formation underlies the Kinzers Formation and consists of blue-gray, knotty dolomite, gray, fine-grained, interbedded dolomite and limestone, massive gray dolomite, and some laminated marble. Its thickness averages about 500 feet.³⁰

Underlying the Vintage Formation is the Cambrian age Antietam Formation, which is a gray, fine- to medium-grained, hard, vitreous quartzite. The lower portion is laminated, phyllitic, and micaceous. Its estimated thickness is approximately 200 feet.³¹

The Cambrian age Harpers phyllite is a greenish-gray, argillaceous, quartzite phyllite that has interlayered quartz zones parallel to a well-developed cleavage. Mica flakes are outstanding on cleavage surfaces. Its thickness is estimated to be about 800 feet.^{28,30}

The Cambrian age Chickies Formation, which underlies the Harpers phyllite, has two distinct units. One unit is a light gray, hard, massive, well-bedded quartzite containing some thin black slate partings. The Hellam Conglomerate, a hard quartz-pebble conglomerate, is present at the base. The second unit is a dark brown to black, micaceous, phyllitic slate containing numerous quartz veins. The thickness of the total formation is 900 to 1,000 feet.³⁰

The Triassic age New Oxford Formation unconformably overlies the older formations along the northwestern edge of the study area. The New Oxford Formation consists of red shale and mudstone with interbedded red and gray sandstone and some conglomerate. Its thickness is approximately 6,000 feet.³⁰

A Triassic age diabase dike cuts through the western half of the study area. The dike consists of hard, fine- to medium-crystalline, gray diabase that is composed of plagioclase, feldspar, and augite.³⁰

3.3.2 Soils

The soils mapped at the site are the Conestoga silt loam, three to eight percent slopes, moderately eroded, and the Lindside silt loam. The Conestoga soils are deep and well drained and developed in material weathered from calcareous schist. The soil is a yellowish-brown silt loam to silty clay loam, with a pH between 5.8 and 6.5. Permeability is moderately rapid. The Lindside soils are deep and moderately well drained. The soil is a brown to yellowish-brown silt loam with a pH between 5.8 and 6.0. Permeability is moderately rapid.³¹

3.3.3 Groundwater

In the bedrock, groundwater is stored and transmitted principally along solution channels, fractures, joints, and bedding-plane separations. Solution channels are the main influence on water movement in carbonate rocks. *These channels allow the storage and transmission of large quantities of water, sometimes several miles before discharging.*^{28,30}

All of the formations in the study area have aquifer potential. The Conestoga Formation is capable of yielding moderate to large quantities of water to wells with yields ranging between 0 and 250 gallons per minute (gpm). The Kinzers Formation yields small to moderate amounts of water to wells. The Vintage Formation, New Oxford Formation, and Chickies Formation are capable of sufficient yields for small public and some industrial suppliers. Well yields range from less than 1 to 300 gpm, with median yields of 7 to 11 gpm. The Ledger dolomite is one of the most productive aquifers in the Conestoga Valley Section, with yields from 3 to 800 gpm and a median yield of 65 gpm. The Antietam Formation and Harpers phyllite generally yield sufficient groundwater for domestic supplies. Well yields range from 1 to 250 gpm, with median yields of 6 to 8 gpm.^{28,30}

The groundwater is under water-table conditions, with local areas of artesian conditions. The bedrock units are hydraulically interconnected through fractures. Depth to groundwater at the site is unknown but is expected to be less than 20 feet. The direction of shallow groundwater flow at the site is expected to be to the north-northwest, toward Codorus Creek.^{28,30}

3.4 Climate and Meteorology

The average daily maximum temperature in the York area is 64.8° F, and the average daily minimum is 41.5° F. The average monthly temperatures range from 30.0°F in January to 74.7°F in July. The average annual precipitation for the area is 40.1 inches, and the mean annual lake evaporation is approximately 33 inches. This results in a net precipitation of 7.1 inches. A 1-year, 24-hour rainfall will provide approximately 2.5 inches.³²

3.5 Land Use

Keystone Color Works, Incorporated is located in the north-central section of the city of York. The area is composed of various commercial and residential dwellings and is six blocks from the center of town. In the immediate vicinity of the plant, Fostner Company is located across West Gay Avenue, and an apartment house is east of the plant. Railroad tracks and Codorus Creek are west of the plant.¹

3.6 Population Distribution

The estimated population within a 0- to 1-mile radius of the subject site is 10,055 persons; within a 1- to 2-mile radius of the subject site, the population is 46,400 people; and within a 2- to 3-mile radius of the site, the population is 16,922 people. These figures are based on a count of homes in the area multiplied by 3.8 people and on the Rand McNally census guide.^{1,33}

3.7 Critical Environments

The bald eagle (Haliaeetus leucocephalus) and the peregrine falcon (Falco peregrinus) are two federally listed endangered birds that are expected to be found as transient species in the project area. There is no listed critical habitat for these species in the project area. There is no information to indicate that any endangered species under the jurisdiction of the Fish and Wildlife Service reside within a three-mile radius of the site.³⁴

4.0 WASTE TYPES AND QUANTITIES

Hazardous wastes generated on site have been classified by the facility as including the following EPA RCRA waste identification numbers: K002, P077, and U188. The waste codes presented were derived from the facility's Part A Hazardous Waste Application.⁸

Changes in the facility's manufacturing operations in early 1980 eliminated the generation of chrome yellow and molybdate orange colorants. These pigments contained both lead and chromium. These pigments were manufactured between 1961 and 1980. Disposal of wastes generated from such products were stored in 55-gallon drums located in area no. 6 (the northwestern corner of the storage warehouse) until they could be shipped off site for disposal. The exact quantities of wastes generated during this time are unknown. Sludge wastes were disposed at the Old York County Landfill (1961 until 1974) and York Landfill (1974 until 1980).^{3,6,8,13,14}

From 1980 through 1987, with the exception of about 10 drums of K002 generated prior to 1980, waste sludge was transported to CECOS International, Incorporated, in New York, for treatment and disposal. Wastes were considered industrial and not hazardous. Currently (since 1987), sludge is pumped directly from the treatment tank into a tank truck by Eldredge, Incorporated and is transported to the DuPont treatment facility, in Deepwater, New Jersey, for disposal.^{3,6,8,13,14,34}

4.1 Solid Waste Management Units

Four SWMUS have been identified for the site: the wastewater treatment tanks, the former waste drum storage area, the wastewater collection pit, and the empty raw materials drum storage area. The wastewater treatment tanks are currently in operation. Tanks are used to store and treat wastewater. After disposal of wastewater into the York sewage system, sludge is pumped into a tank truck for treatment and disposal at a DuPont treatment facility. The waste drum storage area was used for the storage of waste sludge during the manufacture of chrome yellow and molybdate orange colorants. This SWMU was closed in 1980 and is now occupied by empty product drums. The wastewater collection pit is where all wastewater is collected and pumped into one of the treatment tanks. The fourth SWMU is utilized for the storage of empty drums of raw materials. Drums are stored until the products' manufacturer picks them up for reuse or disposal.^{2,3}

4.1.1 SWMU No. 1

Wastewater Treatment Tanks

The wastewater treatment tanks, located in the building's far northern end, comprise 3 large, fiberglass, open-top tanks and one 2,000-gallon wooden tank. The tanks are placed on a concrete floor and are surrounded by a three-feet-high cement dike.^{2,3}

The three fiberglass tanks each had a release valve near the bottom that was interconnected to a single outflow valve that would be utilized when emptying the sludge from the tank. No HNU readings above background were recorded at or near the vicinity of the tank.^{2,3}

Date of Start-Up

From the 1960s through the 1970s, the plant used the one 2,000-gallon wooden tank. Because of increased production, one 8,000-gallon and two 12,000-gallon fiberglass storage tanks were added in the mid-to-late 1970s.³

Date of Closure

This area is still utilized by the facility.^{2,3}

Waste Managed

The wastes that were stored in these units were wastewater from the production of various colors and pigments. Wastewater was drawn off the top of the production tanks, put into one of the large treatment tanks, allowed to settle over night, after being treated with alum, and pH balanced. The top water contains sodium sulfate and sodium chrome, which is pumped into the city sewer. The sludge was pumped into the wooden tank and filter-pressed (1961 until 1980), and the residual was deposited into 55-gallon drums. The drums were sent to the Old York County Landfill from 1961 through 1974 and the York County Landfill from 1974 through 1980.^{3,6}

From 1980 through 1987, waste sludge was transported to CECOS International, Incorporated, in New York, for treatment and disposal. Wastes were considered industrial and not hazardous. Currently, any sludge generated is pumped directly from the treatment tanks into a tank truck by Eldredge, Incorporated. Eldredge transports the sludge to a DuPont treatment facility in New Jersey for treatment and disposal.^{2,3}

Release Controls

Wastes were stored in sealed 55-gallon drums on a concrete floor in area no. 6 (the warehouse storage area), in the northwestern corner.³

History of Releases

On June 25, 1987, an overflow from one of the treatment tanks caused an unauthorized release of untreated wastewater into a storm sewer. Keystone ceased manufacturing hazardous constituents in 1980. No evidence of a spill was observed during the FIT 3 visit.^{2,3}

4.1.2 SWMU No. 2

Former Waste Drum Storage Area

The former hazardous waste drum storage area was a 15- by 30-foot concrete-lined floor inside the northwestern corner of the warehouse storage area. No HNU readings above background were recorded, and no evidence of spills was observed during the site visit.^{2,3}

Date of Start-Up

This storage area has always been utilized as a drum storage area. However, from the 1960s through 1980, Keystone stored its sludge waste (K002) in 55-gallon drums in this area until it was disposed.³

Date of Closure

This area was closed after the remaining 100 drums of sludge waste (generated before 1980) were disposed through CECOS. This area now is occupied by product storage containers.³

Wastes Managed

Waste sludge (K002) was contained in sealed 55-gallon drums and stored until disposal in a nearby landfill. PA DER was not aware of this disposal of waste into the landfill.^{2,3,13,14}

Release Controls

Drums were stored in area no. 6 (warehouse) on the concrete-lined floor. No containment measures were known to exist. There was no evidence of spills during the NUS site visit.^{2,3}

History of Releases

No releases from this area have been reported. No evidence of spills or releases was observed during the site visit.^{2,3}

4.1.3 SWMU No. 3

Wastewater Collection Pit

The wastewater collection pit is located just outside the boiler room (area no. 5). The pit is concrete-lined, with a capacity of 1,500 gallons. A series of open-trench floor drains running throughout the first floor of the plant leads to this pit. From there, the wastewater is automatically pumped via a hose into one of the designated treatment tanks.³

Date of Start-Up

The wastewater collection pit was constructed in the early 1930s. Open-trench floor drains located on the first floor all drain to the pit. In mid-1987, boiler blowdown water and noncontact cooling water were rerouted to the drain to the collection pit. This was incorporated because of the newly constructed concrete diking around the treatment tank.³

Date of Closure

There are no plans for closure of the wastewater collection pit.³

Wastes Managed

Wastewater is collected and automatically fed into one of four designated treatment tanks (SWMU no. 1). The level of the pit is monitored on a daily basis to ensure proper float operation.³

Release Controls

No releases from this area have been reported. No evidences of spills or overflows was observed during the F/T 3 visit.^{2,3}

History of Releases

No releases from this area have been reported. No evidence of spills or releases was observed during the site visit.^{2,3}

4.1.4 SWMU No. 4

Empty Raw Materials Drum Storage Area

Empty raw material drums are stored against the eastern portion of the interior wall located in the warehouse. The drums are stacked upright on pallets and on the concrete-lined floor. The drums are stored until they can be crushed or picked up by the producer of the materials. No HNU readings above background were recorded in or near the vicinity of the drums.^{2,3}

Date of Start-Up

Available information indicates that this area has always been used by Keystone for empty drum storage.³

Date of Closure

There are no plans for discontinuing the storage of empty drums.³

Wastes Managed

The empty raw material drums contained various materials that are used as start-up and as intermediates in some quantity in the manufacturing processes.³

Release Controls

All drums in this area are empty and stacked in an upright position.^{2,3}

History of Releases

No releases from this area have been reported. No evidence of spills or releases was observed during the site visit.^{2,3}

5.0 FIELD TRIP REPORT

5.1 Summary

On April 25, 1989, NUS FIT 3 members Michael McCarthy and Thomas Bachovchin visited the Keystone Color Works, Incorporated facility in the city of York, York County, Pennsylvania. Keystone's general manager, Robert Rohrer, granted site access and accompanied the FIT during the site visit. Weather conditions were mostly sunny, with temperatures in the mid-50s. Photographs were taken on site (see figure 5.1, page 5-3, and the photograph log, section 5.4).

5.2 Persons Contacted

5.2.1 Prior to Field Trip

Robert Rohrer
General Manager
Keystone Color Works
151 West Gay Avenue
P.O. Box 1984
York, PA 17405
(717) 854-9541

M. Shawn Rosenberger
PA DER
Harrisburg Regional Offices
One Ararat Boulevard
Harrisburg, PA 17110
(717) 657-4588

5.2.2 At the Site

Robert Rohrer
General Manager
Keystone Color Works
151 West Gay Avenue
P.O. Box 1984
York, PA 17405
(717) 854-9541

M. Shawn Rosenberger
PA DER
Harrisburg Regional Offices
One Ararat Boulevard
Harrisburg, PA 17110
(717) 657-4588

5.2.3 Water Supply Well Information

The water supply for the site vicinity is provided by municipal surface water sources and private wells. The majority of the population within three miles of the site obtains its potable water from York Water Company. York Water Company serves an estimated 130,500 people. The nearest private well is located between two to three miles southeast of the facility.

5.3 Site Observations

- The HNU background reading was 0.1 ppm. No readings above background were recorded throughout the facility.
- The mini-alert was set on the X1 scale. No readings above background were recorded.
- All plant processes and the storage of materials are contained within the building. No storage of any sort is conducted outside the plant's walls.
- Keystone rents a small parking lot across from the building's main entrance. The paved parking lot can hold approximately 12 to 15 cars.
- Open-trench floor drains were observed on the facility's first floor. These drains handled the wastewater generated from the plant process. A floor drain led from each of the various color rooms and was gravity-fed to a collection pit located outside the boiler room. From there, the wastewater was automatically piped via hosing into one of four collection tanks.
- The wastewater treatment room contained four large tanks (three fiberglass and one wooden). These tanks were on a concrete-lined floor surrounded by a three-foot-high cement dike. The cement dike was located just inside what was once an open-trench floor drain that carried noncontact cooling water, boiler blowdown water, and rain water from the plant's roof. An accidental overflow from one of the treatment tanks flowed into this drain and into Codorus Creek. This drain has been redesigned to raise above the floor of the treatment room (three to four feet riser placed on drain). A pipe has been placed within the trench, and the trench has been cemented over. This drain now accepts rain water runoff from the roof. Cooling water and boiler water are now rerouted to the collecting pit.
- Rain water drainage from the building flows to the north, toward Codorus Creek.
- Keystone Color employs approximately 10 people.
- The various color rooms contained dye and stained walls, depending upon the color manufactured. The following pigments are observed being manufacturing at Keystone: burnt umber, red iron oxide, yellow iron oxide, and ultramarine blue, none of which contain lead or chromium.

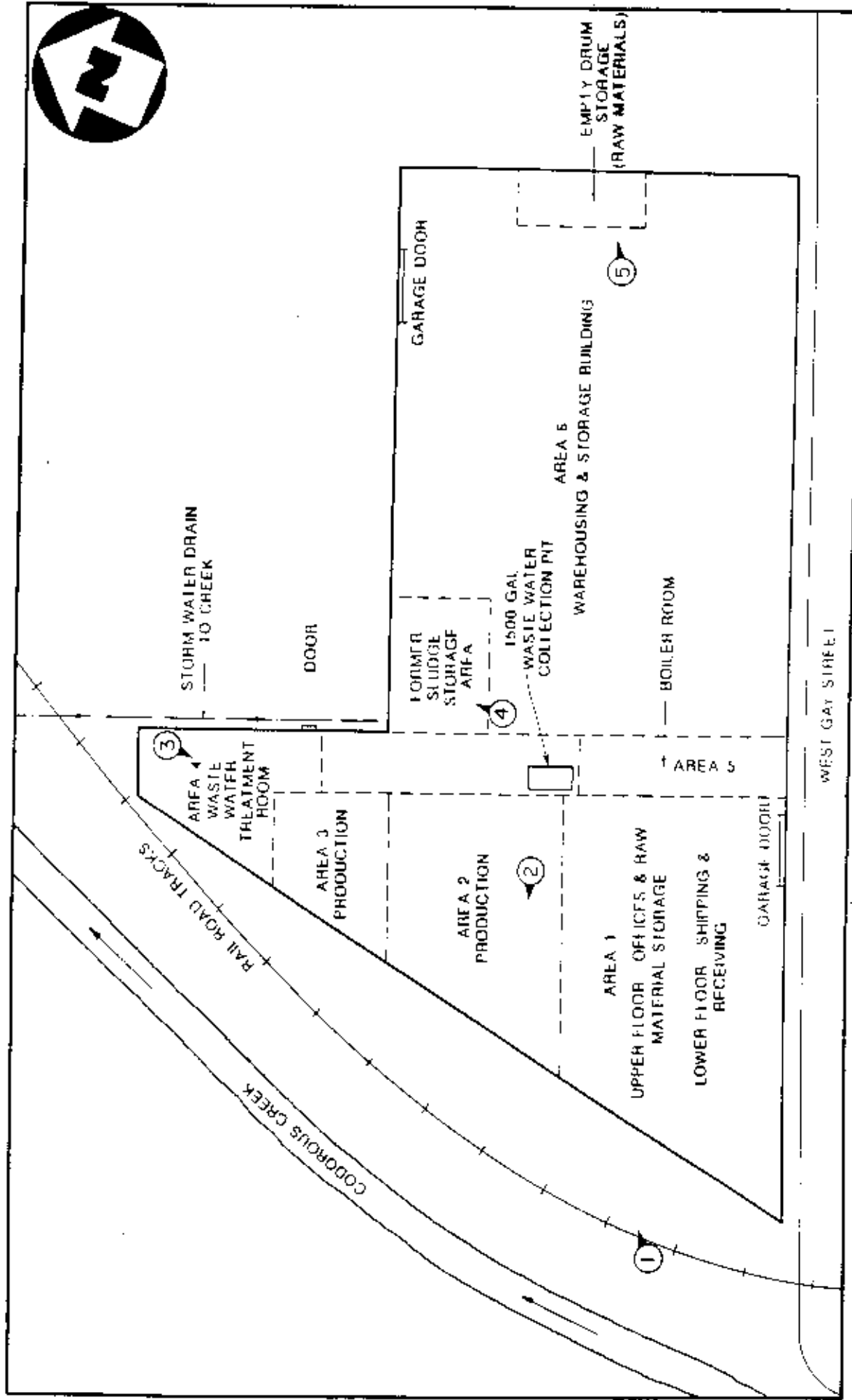


FIGURE 5.1

PHOTO LOCATION MAP
KEYSTONE COLOR WORKS INC.

(NO SCALE)



LEACHATE ANALYSIS

10/01/85

- analytical
- consulting
- research

KEYSTONE COLOR WORKS, INC
BOX 1984
131 341 AVENUE
YORK, PA 17405

REPORT OF ANALYSIS

SAMPLE: 6008

SAMPLE MARKINGS: WASTE WATER SLUDGE RECD 8/19/85
WASTE WTR SLUDGE

ARSENIC	0.0002	MG/L
BARIUM	0.32	MG/L
CADMIUM	0.012	MG/L
CHROMIUM	0.3	MG/L
LEAD	1.018	MG/L
MERCURY	0.0002	MG/L
SELENIUM	0.4	MG/L
SILVER	0.007	MG/L
RESIDUE, TOTAL	888	MG/L
RESIDUE, VOLATILE	141	MG/L
SPECIFIC CONDUCTANCE	518.5	CMH/L
PH	5.4	
HEXICAL OXYGEN DEMAND	107.75	MG/L
TOC	0.12	MG/L

RESPECTFULLY SUBMITTED,

EASTERN LABORATORY SERVICE

75 10 1985



Photo 1 Outside view of Keystone Color Works, Inc.

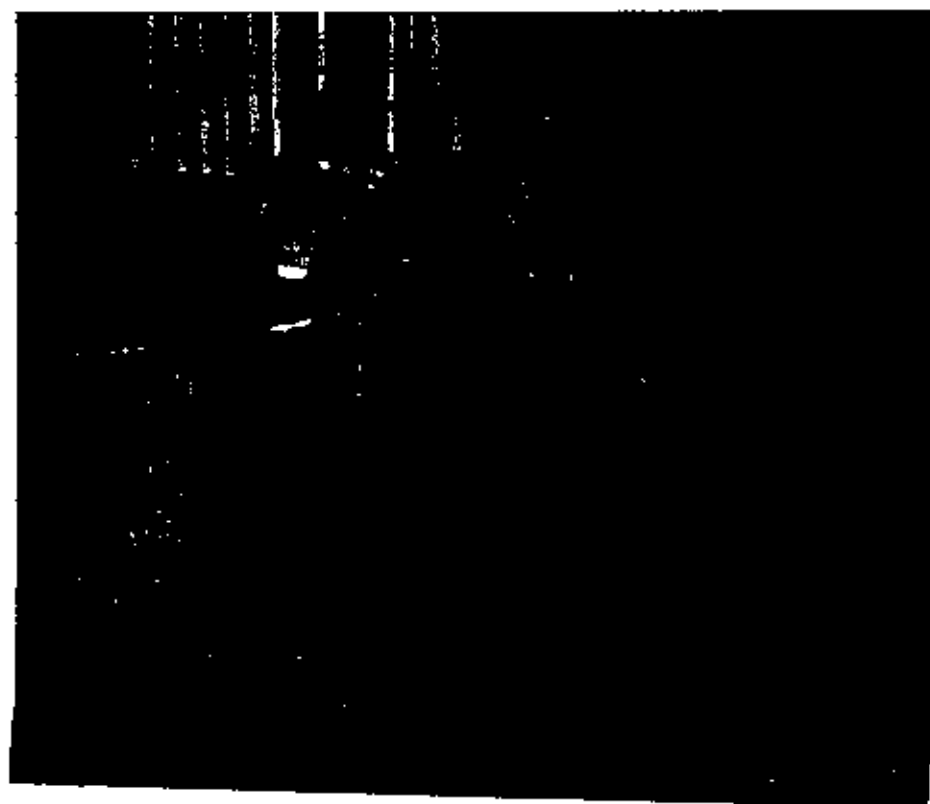


Photo 2 500 gallon mixing/blending tank.

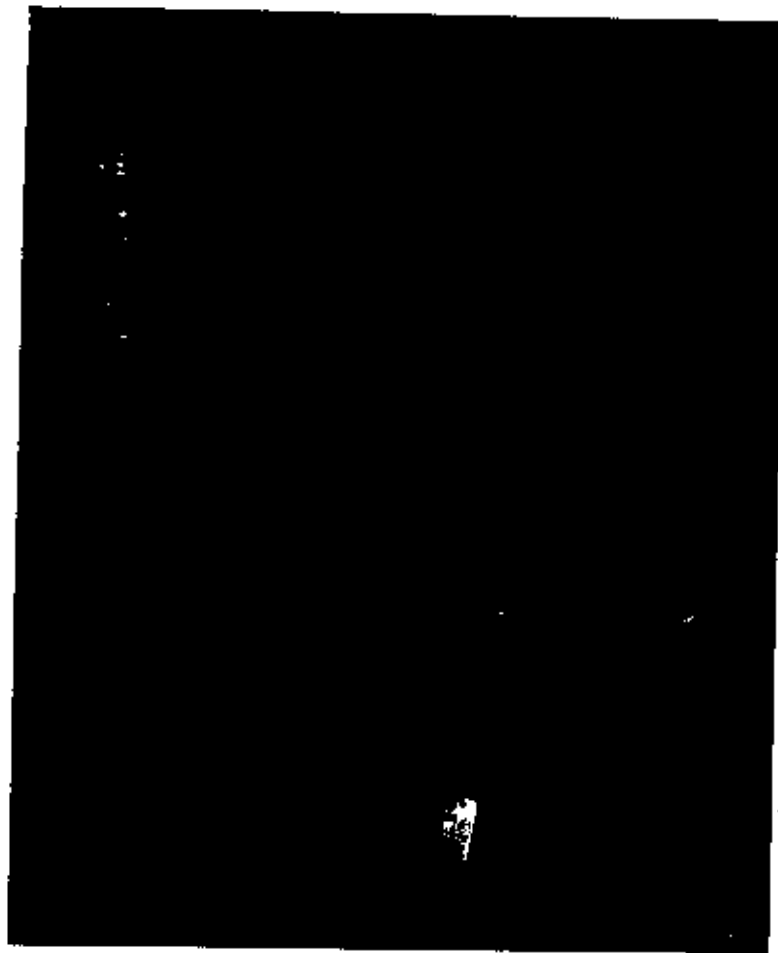


Photo 3 treatment tanks valves

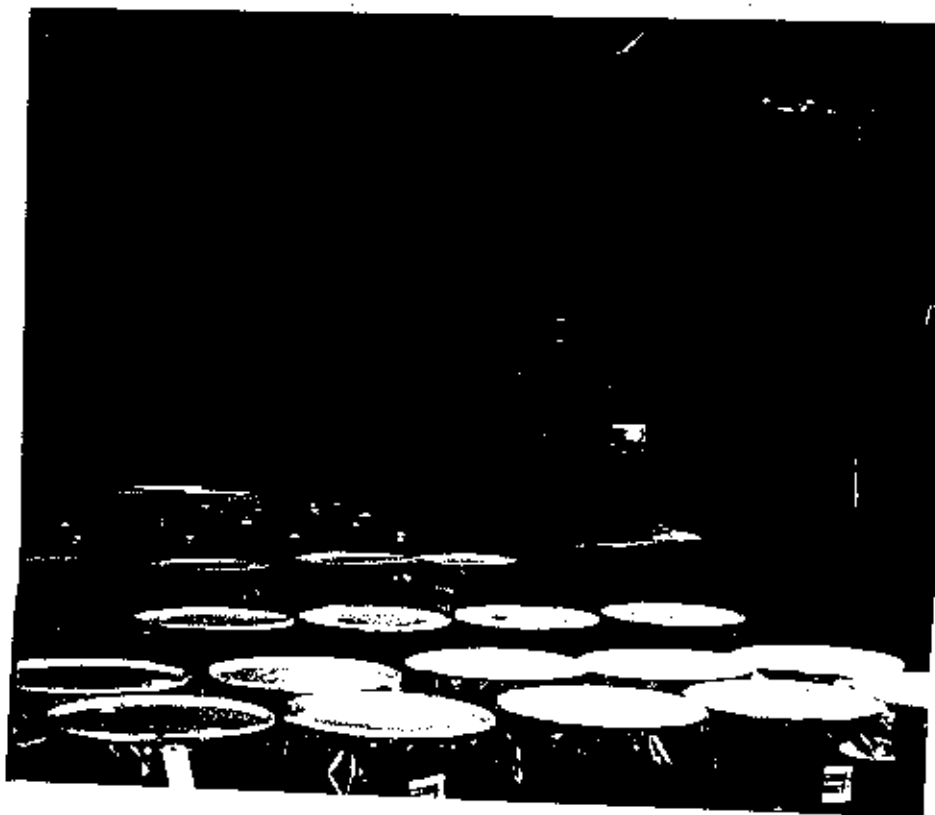


Photo 4 Filter Pressed Sludge Drum
storage area.



Photo 5 Empty Drum Storage (Raw Materials)



**POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT**

I. IDENTIFICATION
01 STATE 02 SITE NUMBER
PA 2423

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site) Keystone Color Works, Incorporated		02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER 151 West Gay Avenue			
03 CITY York		04 STATE PA	05 ZIP CODE 17405	06 COUNTY York	07 COUNTY CODE 133
09 COORDINATES LATITUDE 39° 57' 56.0"		LONGITUDE 76° 44' 10.0"			

10 DIRECTIONS TO SITE (Starting from nearest public road)

From the Pennsylvania Turnpike, take exit 18, follow the State Route 83 South to interchange 9. Follow State Route 250 West to George Street exit, follow George Street to Philadelphia Street. Turn right on Philadelphia Street, right on Beaver Street, and left on West Gay Street.

III. RESPONSIBLE PARTIES

01 OWNER (if known) Herbert R. Ehler		02 STREET (Business, mailing, residential) 470 County Club Road			
03 CITY York		04 STATE PA	05 ZIP CODE 17403	06 TELEPHONE NUMBER () - ()	
07 OPERATOR (if known and different from owner) Robert C. Rohrey (General Manager)		08 STREET (Business, mailing, residential) 151 West Gay Avenue			
09 CITY York		10 STATE PA	11 ZIP CODE 17405	12 TELEPHONE NUMBER (717) 854-9541	
13 TYPE OF OWNERSHIP (Check one) <input checked="" type="checkbox"/> A PRIVATE <input type="checkbox"/> B. FEDERAL <input type="checkbox"/> C STATE <input type="checkbox"/> D. COUNTY <input type="checkbox"/> E MUNICIPAL <input type="checkbox"/> F OTHER: _____ <input type="checkbox"/> G. UNKNOWN					

14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)

☐ A RCRA 3001 DATE RECEIVED _____ ☐ B UNCONTROLLED WASTE SITE (RCRA 102(c)) DATE RECEIVED _____ ☐ C NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION <input checked="" type="checkbox"/> YES DATE <u>4/26/89</u> <input type="checkbox"/> NO MONTH DAY YEAR		02 BY (Check all that apply) <input type="checkbox"/> A EPA <input type="checkbox"/> B EPA CONTRACTOR <input type="checkbox"/> C STATE <input type="checkbox"/> D OTHER CONTRACTOR <input type="checkbox"/> E LOCAL HEALTH OFFICIAL <input type="checkbox"/> F OTHER _____	
03 SITE STATUS (Check one) <input checked="" type="checkbox"/> A ACTIVE <input type="checkbox"/> B INACTIVE <input type="checkbox"/> C UNKNOWN		04 YEARS OF OPERATION BEGINNING YEAR <u>1920s</u> ENDING YEAR <u>Present</u> <input type="checkbox"/> UNKNOWN	

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN OR ALLEGED

Keystone Color Works, Incorporated manufactured chrome yellow and molybdate orange colorants between the years 1940 through 1980. These pigments contain lead and chromium elements considered to be hazardous.

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

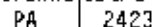
Waste sludge was disposed in two area landfills (Old York County landfill and York landfill). This was done without the knowledge of PA DER. Keystone Color ceased manufacturing these two particular colorants in late 1980.

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)			
<input type="checkbox"/> A HIGH (Inspection required immediately)	<input type="checkbox"/> B MEDIUM (Inspection required)	<input type="checkbox"/> C LOW (Inspected on time available basis)	<input checked="" type="checkbox"/> D NONE (No further action needed, complete current disposition form)

VI. INFORMATION AVAILABLE FROM

01 CONTACT James Harper		02 OF (Agency, Organization) U.S. EPA		03 TELEPHONE NUMBER (215) 597-0823	
04 PERSON RESPONSIBLE FOR ASSESSMENT Michael McCarthy		05 AGENCY NUS	06 ORGANIZATION FIT 3	07 TELEPHONE NUMBER (215) 877-1882	08 DATE 6/22/89 MONTH DAY YEAR



X A TOXIC	E SOLUBLE	- HIGHLY VOLATILE
- B CORROSIVE	- F INFECTIOUS	- J EXPLOSIVE
- C RADIOACTIVE	- G FLAMMABLE	- K REACTIVE
X D PERSISTENT	- H INSTABLE	- L INCOMPATIBLE
		- M NOT APPLICABLE



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT

PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

1. IDENTIFICATION

01 STATE 02 SITE NUMBER
PA 2423

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☐ A GROUNDWATER CONTAMINATION
03 POPULATION POTENTIALLY AFFECTED _____

02 ☐ OBSERVED / DATE _____
04 NARRATIVE DESCRIPTION

☐ POTENTIAL ☐ ALLEGED

None reported or observed.

01 ☐ B SURFACE WATER CONTAMINATION
03 POPULATION POTENTIALLY AFFECTED unknown

02 ☒ OBSERVED / DATE 6/25/87
04 NARRATIVE DESCRIPTION

☐ POTENTIAL ☐ ALLEGED

There was an unauthorized discharge of wastewater into Codorus Creek. The spill was a result of a malfunctioning float bulb on treatment tank.

01 ☐ C CONTAMINATION OF AIR
03 POPULATION POTENTIALLY AFFECTED _____

02 ☐ OBSERVED / DATE _____
04 NARRATIVE DESCRIPTION

☐ POTENTIAL ☐ ALLEGED

None reported or observed.

01 ☐ D FIRE EXPLOSIVE CONDITIONS
03 POPULATION POTENTIALLY AFFECTED _____

02 ☐ OBSERVED / DATE _____
04 NARRATIVE DESCRIPTION

☐ POTENTIAL ☐ ALLEGED

None reported or observed.

01 ☐ E DIRECT CONTACT
03 POPULATION POTENTIALLY AFFECTED _____

02 ☐ OBSERVED / DATE _____
04 NARRATIVE DESCRIPTION

☐ POTENTIAL ☐ ALLEGED

None reported or observed.

01 ☐ F CONTAMINATION OF SOIL
03 AREA POTENTIALLY AFFECTED _____
(ACRES)

02 ☐ OBSERVED / DATE _____
04 NARRATIVE DESCRIPTION

☐ POTENTIAL ☐ ALLEGED

None reported or observed.

01 ☐ G DRINKING WATER CONTAMINATION
03 POPULATION POTENTIALLY AFFECTED _____

02 ☐ OBSERVED / DATE _____
04 NARRATIVE DESCRIPTION

☐ POTENTIAL ☐ ALLEGED

None reported or observed.

01 ☐ H WORKER EXPOSURE/INJURY
03 WORKERS POTENTIALLY AFFECTED _____

02 ☐ OBSERVED / DATE _____
04 NARRATIVE DESCRIPTION

☐ POTENTIAL ☐ ALLEGED

None reported or observed.

01 ☐ I POPULATION EXPOSURE/INJURY
03 POPULATION POTENTIALLY AFFECTED _____

02 ☐ OBSERVED / DATE _____
04 NARRATIVE DESCRIPTION

☐ POTENTIAL ☐ ALLEGED

None reported or observed.



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT

PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE 02 SITE NUMBER
PA 2423

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ☐ J. DAMAGE TO FLORA
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE _____)

☐ POTENTIAL ☐ ALLEGED

None reported or observed.

01 ☐ K. DAMAGE TO FAUNA
04 NARRATIVE DESCRIPTION (include number of species)

02 ☐ OBSERVED (DATE _____)

☐ POTENTIAL ☐ ALLEGED

None reported or observed.

01 ☐ L. CONTAMINATION OF FOOD CHAIN
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE _____)

☐ POTENTIAL ☐ ALLEGED

None reported or observed.

01 ☐ M. UNSTABLE CONTAINMENT OF WASTES
(Soils, runoff, seeping liquids, rising drums)

02 ☐ OBSERVED (DATE _____)

☐ POTENTIAL ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

None reported or observed.

01 ☐ N. DAMAGE TO OFFSITE PROPERTY
04 NARRATIVE DESCRIPTION

02 ☒ OBSERVED (DATE 6/26/87)

☐ POTENTIAL ☐ ALLEGED

PA DER inspection upon report of the spill revealed a yellow pigment residual along the storm drain outlet. During the NUS site visit on September 26, 1989, no residual was observed along the outlet pipe.

01 ☐ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPs 02 ☒ OBSERVED (DATE 6/25/87)

☐ POTENTIAL ☐ ALLEGED

04 NARRATIVE DESCRIPTION

A malfunctioning float bulb on the treatment tank allowed wastewater to overflow the tank and drain into a floor drain, which connected to the storm sewer and discharged into Codorus Creek.

01 ☐ P. ILLEGAL, UNAUTHORIZED DUMPING
04 NARRATIVE DESCRIPTION

02 ☒ OBSERVED (DATE 6/25/87)

☐ POTENTIAL ☐ ALLEGED

There was an unauthorized discharge of wastewater onto Codorus Creek.

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

None reported or observed.

III. TOTAL POPULATION POTENTIALLY AFFECTED: _____

IV. COMMENTS

V. SOURCES OF INFORMATION (List agency references, e.g., State Dept. Sanitary Analysis Reports)

NUS FIT 3. Preliminary assessment; site visit. April 26, 1989.
EPA File Information.
PA DER File Information.

6.0 REFERENCES FOR SECTIONS 1.0 THROUGH 5.0

1. United States Geological Survey. York, Pennsylvania Quadrangle, 7.5 Minute Series. Topographic Map. 1954, photorevised 1973. Combined with West York, Pennsylvania Quadrangle, 7.5 Minute Series. Topographic Map. 1954, photorevised 1973; Dover, Pennsylvania Quadrangle, 7.5 Minute Series. Topographic Map. 1963, photorevised 1973; and York Haven, Pennsylvania Quadrangle, 7.5 Minute Series. Topographic Map. 1964, photorevised 1972.
2. NUS Corporation, FIT 3. Preliminary assessment; site visit. TDD No. F3-8903-53, April 25, 1989.
3. Rohrer, Robert C., General Manager, Keystone Color Works, Incorporated, with Michael McCarthy, NUS FIT 3. Meeting. April 26, 1989.
4. United States Environmental Protection Agency. Notification of Hazardous Waste Activity. EPA Form 8700-12, OMB Approved No. 158-5790.6, July 16, 1980.
5. United States Environmental Protection Agency. Acknowledgement of Notification of Hazardous Waste Activity, EPA Form 8700-12B (4-80). October 9, 1980.
6. United States Environmental Protection Agency. Application for a Hazardous Waste Permit, Consolidated Permits Program. EPA Form 3510-1, Form Approved OMB No. 158-R0175. October 21, 1980.
7. United States Environmental Protection Agency. Acknowledgement of Application for a Hazardous Waste Permit. December 11, 1980.
8. United States Environmental Protection Agency. Conditions of Operation during Interim Status. August 5, 1981.
9. Budd, William, Pennsylvania Department of Environmental Resources, to Robert Hamme, General Manager, Keystone Color Works. Telephone Communication. April 30, 1981.

10. Walsh, William, Pennsylvania Department of Environmental Resources, with Robert Hamme, Manager, Keystone Color Works. Record of Communication. December 9, 1981.
11. Henry, Joan, United States Environmental Protection Agency, with Paul Eyster, Keystone Color Works. Status of TSD Facility; Record of Communication. February 6, 1984.
12. Eyster, Paul, Jr., Chemist, Keystone Color Works, to Joan Henry, United States Environmental Protection Agency. Correspondence. February 6, 1984.
13. Pennsylvania Department of Environmental Resources. Acknowledgement of Application for a Hazardous Waste Permit. December 11, 1980.
14. Pennsylvania Department of Environmental Resources. Industrial Waste Report - Generator Information. Form No. 1, February 24, 1987.
15. Hamme, Robert E., Vice President and General Manager, Keystone Color Works, to Commonwealth of Pennsylvania. Quarterly Report. July 29, 1981.
16. Rohrer, Robert, General Manager, Keystone Color Works, to Ken Beard, Pennsylvania Department of Environmental Resources. Correspondence. February 20, 1986. (Removal of Keystone Color Works, Incorporated from the Hazardous Waste Generator List).
17. Pennsylvania Department of Environmental Resources, Bureau of Solid Waste Management. Notification of Hazardous Waste Activity. PA DER Form ER-SWM-53, Rev. March 1982. February 20, 1986.
18. Pennsylvania Department of Environmental Resources, Bureau of Solid Waste Management. Inspection Report, Denotification Inquiry. May 22, 1986.
20. Pennsylvania Department of Environmental Resources, Bureau of Solid Waste Management, to Keystone Color Works, Incorporated. Notice of Violation. August 7, 1987.

21. Rohrer, Robert, General Manager, Keystone Color Works, to Janice Gutkowski, Pennsylvania Department of Environmental Resources. Response to Unauthorized Discharge of Wastewater into Codorus Creek.
22. Rudisili, Stanley E., Water Quality Compliance Specialist, Pennsylvania Department of Environmental Resources, to Keystone Color Works, Incorporated. Settlement of Violation Notification. October 9, 1987.
23. York Water Company. Gravity and Repumped System; Water Distribution Map. 1983.
24. Bissley, Robert, York Water Company, with Thomas Pearce, NUS FIT 3. Telecon. February 21, 1986.
25. Barnhart, Dale, York Water Company, with James Criswell, NUS FIT 3. Telecon. April 21, 1988.
26. Pennsylvania Department of Environmental Resources, Bureau of Topographic and Geologic Survey. Groundwater Inventory System. 1984.
27. Pennsylvania Department of Environmental Resources, Title 25 Rules and Regulations Part 1, Department of Environmental Resources, Subpart C. Protection of Natural Resources Article II. Water Resources Chapter 93. Water Quality Standards p. 93.28.
28. Lloyd, O.B. Jr., and D.C. Growitze, Pennsylvania Geological Survey. Groundwater Resources of the Central and Southern York County, Pennsylvania. Water Resource Report 42, 1977.
29. Taylor, L.E., and W.H. Werkheiser, Pennsylvania Geological Survey. Groundwater Resources of the Lower Susquehanna River Basin, Pennsylvania. Water Resource Report 57, 1984.
30. Wilshusen, J.P., Pennsylvania Geological Survey. Environmental Geology of the Greater York Area, York County, Pennsylvania. Environmental Geology Report 6, 1979.
31. United States Department of Agriculture, Soil Conservation Service. Soil Survey of York County, Pennsylvania. 1963.

32. National Oceanic and Atmospheric Administration. Climatology of the United States. Local Climatological Data, Annual Summary with Comparative Data. York, Pennsylvania. 1983.
33. Rand McNally Commercial Reference Map and Guide. Pennsylvania. 1983.
34. Kulp, Charles, United States Department of the Interior, Fish and Wildlife Service, to Garth Glenn, NUS FIT 3. Correspondence. May 11, 1987.
35. Rohrer, Robert C., General Manager, Keystone Color Works, Incorporated, to William L. Walsh, United States Environmental Protection Agency. Correspondence. April 10, 1989.

**PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF AIR QUALITY**

SCL REGION ✓

NATURAL MINOR (STATE ONLY) OPERATING PERMIT APPLICATION

Section 1: General Information**1.1 Application Type**

Type of permit for which application is made:

- ☒ Initial
☐ Renewal
☐ Modification

FOR OFFICIAL USE ONLYState Only OP #: 67-03092Reviewed By: Dave AllenDate: 05-30-00

Comments: _____

\$600.00 fee paid**1.2 Plant Information**

- a) Firm Name: Ohio Blenders of PA, Inc. b) Federal Tax ID: 23-2229112
c) Plant Name: Ohio Blenders York
d) Permit Contact: Jeffery Turnow e) Telephone: (717) 848-2537
f) SIC Code: 2048 g) Description of SIC Code: Prepared Food & Feed Ingredients for Animals and Poultry Except Dogs and Cats
h) County: York i) Municipality: City of York

1.3 Mailing Information

Name: Jeffery Turnow Title: Manager
Address: PO Box 1306 York PA 17405
Telephone Number: 717 848-2537

1.4 Certification of Truth, Accuracy and Completeness

This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete.

Subject to the penalties of Title 18 Pa. C.S. Section 4904 and 35 P.S. Section 4009 (b) (2), I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate, and complete.

(Signed) Jeffery TurnowDate 5/5/2000Name (Typed) Jeffery TurnowTitle: Manager

[illegible]

Section 3: Source Information

Complete this section for each source at this site.

3.1 General Source Information

- a) Unit ID Number: EL 1 b) Company Designation: Big L-29
- c) Source Type (check one): ☐ Combustion ☐ Incinerator ☒ Process
- d) Plan Approval or Operating Permit Number: (old number 67-317-030)
- e) Manufacturer: Sprout Waldron f) Model Number: N.A.
- g) Unit Description: 90' bucket elevator leg
- h) Rated ~~Heat Input~~ Thruput: 90 ton/hr. i) Installation Date: 1955
- j) Type of Fuel: electric k) Annual Fuel Usage: N.A.
- l) Sulfur Content of Fuel (%): - 0 -

Incinerators: Complete the following additional information

- a) Incinerator Capacity: Lbs/Hr
- b) Waste Type:
- c) Primary Burner Heat Input: Units:
- d) Secondary Burner Heat Input: Units:
- e) Incinerator Class:

3.2 Actual Emission Estimates:

Pollutants	Quantity (lb/hr)	Quantity (tons per year)
<u>fugitive feed ingredients</u>		
<u>primarily dehydrated alfalfa</u>		

Section 3: Source Information

Complete this section for each source at this site.

3.1 General Source Information

- a) Unit ID Number: EL2 b) Company Designation: Small Leg
- c) Source Type (check one): ☐ Combustion ☐ Incinerator ☒ Process
- d) Plan Approval or Operating Permit Number: (old number 67-317-030)
- e) Manufacturer: York f) Model Number: NA
- g) Unit Description: 70' bucket elevator leg
- h) Rated ~~Heat Input~~ Thruput: 90 ton/hr i) Installation Date: 1994
- j) Type of Fuel: electric k) Annual Fuel Usage: NA
- l) Sulfur Content of Fuel (%): -0-

Incinerators: Complete the following additional information

- a) Incinerator Capacity: NA Lbs/Hr b) Waste Type: NA
- c) Primary Burner Heat Input: NA Units: NA
- d) Secondary Burner Heat Input: NA Units: NA
- e) Incinerator Class: NA

3.2 Actual Emission Estimates:

Pollutants	Quantity (lb/hr)	Quantity (tons per year)
<u>negative feed ingredients</u>		
<u>primarily dehydrated alfalfa</u>		

Section 3: Source Information

Complete this section for each source at this site.

3.1 General Source Information

- a) Unit ID Number: HM 1 b) Company Designation: Hammer mill
- c) Source Type (check one): ☐ Combustion ☐ Incinerator ☒ Process
- d) Plan Approval or Operating Permit Number: (old number 67-317-030)
- e) Manufacturer: Jacobson f) Model Number: 8-D universal
- g) Unit Description: Hammer mill
- h) Rated ~~Heat Input~~ Thruput: 15 ton/hr i) Installation Date: 1982
- j) Type of Fuel: electric k) Annual Fuel Usage: NA
- l) Sulfur Content of Fuel (%): -0-

Incinerators: Complete the following additional information

- a) Incinerator Capacity: Lbs/Hr
- b) Waste Type:
- c) Primary Burner Heat Input: Units:
- d) Secondary Burner Heat Input: Units:
- e) Incinerator Class:

3.2 Actual Emission Estimates:

Pollutants	Quantity (lb/hr)	Quantity (tons per year)
<u>fugitive feed ingredients</u>		
<u>primarily dehydrated alfalfa</u>		

Section 3: Source Information

Complete this section for each source at this site.

3.1 General Source Information

- a) Unit ID Number: L01 b) Company Designation: Load Out
- c) Source Type (check one): ☐ Combustion ☐ Incinerator ☒ Process
- d) Plan Approval or Operating Permit Number: (old number 67-317-030)
- e) Manufacturer: Ohio Blenders f) Model Number: NA
- g) Unit Description: articulated truck loader
- h) Rated ~~Heat Input~~ Thruput: 60 ton/hr i) Installation Date: 1987
- j) Type of Fuel: electric k) Annual Fuel Usage: NA
- l) Sulfur Content of Fuel (%): -0-

Incinerators: Complete the following additional information

- a) Incinerator Capacity: NA Lbs/Hr b) Waste Type: NA
- c) Primary Burner Heat Input: NA Units
- d) Secondary Burner Heat Input: NA Units
- e) Incinerator Class: NA

3.2 Actual Emission Estimates:

Pollutants	Quantity (lb/hr)	Quantity (tons per year)
<i>negative feed ingredients</i>		
<i>primarily dehydrated alfalfa</i>		

Section 3: Source Information

Complete this section for each source at this site.

3.1 General Source Information

- a) Unit ID Number: S 1 b) Company Designation: SCRAPER
- c) Source Type (check one): ☐ Combustion ☐ Incinerator ☒ Process
- d) Plan Approval or Operating Permit Number: _____
- e) Manufacturer: Rotex f) Model Number: NA
- g) Unit Description: 4'x10' reciprocating scraper
- h) Rated Heat Input/Thruput: 10 Ton/hr i) Installation Date: June, 2000
- j) Type of Fuel: electric k) Annual Fuel Usage: N.A.
- l) Sulfur Content of Fuel (%): 0

Incinerators: Complete the following additional information

- a) Incinerator Capacity: _____ Lbs/Hr
- b) Waste Type: _____
- c) Primary Burner Heat Input: _____ Units: _____
- d) Secondary Burner Heat Input: _____ Units: _____
- e) Incinerator Class: _____

3.2 Actual Emission Estimates:

Pollutants	Quantity (lb/hr)	Quantity (tons per year)
<u>fugitive feed ingredients</u>		

Section 3: Source Information

Complete this section for each source at this site.

3.1 General Source Information

- a) Unit ID Number: TA 1 b) Company Designation: Track auger
- c) Source Type (check one): ☐ Combustion ☐ Incinerator ☒ Process
- d) Plan Approval or Operating Permit Number: (old number 67-317-030)
- e) Manufacturer: Ohio Blenders f) Model Number: NA
- g) Unit Description: below grade screw conveyor system
- h) Rated Heat Input/Throughput: _____ i) Installation Date: 1982
- j) Type of Fuel: electric k) Annual Fuel Usage: NA
- l) Sulfur Content of Fuel (%): -0-

Incinerators: Complete the following additional information

- a) Incinerator Capacity: _____ Lbs/Hr
- b) Waste Type: _____
- c) Primary Burner Heat Input: _____ Units: _____
- d) Secondary Burner Heat Input: _____ Units: _____
- e) Incinerator Class: _____

3.2 Actual Emission Estimates:

Pollutants	Quantity (lb/hr)	Quantity (tons per year)
<u>fugitive feed ingredients</u>		
<u>primarily dehydrated alfalfa</u>		

Section 3: Source Information

Complete this section for each source at this site.

3.1 General Source Information

- a) Unit ID Number: B1 b) Company Designation: Bagger
- c) Source Type (check one): ☐ Combustion ☐ Incinerator ☒ Process
- d) Plan Approval or Operating Permit Number: (old number 67-317-030)
- e) Manufacturer: St. Regis Paper f) Model Number: 718
- g) Unit Description: Force Flow Packer
- h) Rated Heat Input/Thruput: 5-5000 bags/min i) Installation Date: 1985
- j) Type of Fuel: electric k) Annual Fuel Usage: NA
- l) Sulfur Content of Fuel (%): -0-

Incinerators: Complete the following additional information

- a) Incinerator Capacity: NA Lbs/Hr b) Waste Type: NA
- c) Primary Burner Heat Input: NA Units: NA
- d) Secondary Burner Heat Input: NA Units: NA
- e) Incinerator Class: NA

3.2 Actual Emission Estimates:

Pollutants	Quantity (lb/hr)	Quantity (tons per year)
<u>fugitive feed ingredients</u>		
<u>primarily dehydrated alfalfa</u>		

Section 3: Source Information

Complete this section for each source at this site.

3.1 General Source Information

- a) Unit ID Number: EL 3 b) Company Designation: Drag Loader
- c) Source Type (check one): ☐ Combustion ☐ Incinerator ☒ Process
- d) Plan Approval or Operating Permit Number: (old number 67-317-029)
- e) Manufacturer: Essmuller Co. f) Model Number: 1824 HF 88
- g) Unit Description: High-Flite Incline Conveyor
- h) Rated ~~Heat Input~~ Thruput: 12.0 ton/hr i) Installation Date: 1996
- j) Type of Fuel: electric k) Annual Fuel Usage: NA
- l) Sulfur Content of Fuel (%): -0-

Incinerators: Complete the following additional information

- a) Incinerator Capacity: Lbs/Hr b) Waste Type:
- c) Primary Burner Heat Input: Units:
- d) Secondary Burner Heat Input: Units:
- e) Incinerator Class:

3.2 Actual Emission Estimates:

Pollutants	Quantity (lb/hr)	Quantity (tons per year)
<u>fugitive feed ingredients</u>		

4.1 General Control Device Information

- a) Unit ID Number: DC 1 b) Company Designation: Big dust collector
- c) Used By Sources: EL1, EL2, HM1, LO1, TA1, S1
- d) Type: Fabric Collector
- e) Pressure Drop in H2O: Lin wg f) Estimated Capture Efficiency: 99,999%
- g) Scrubber Fluid Flow Rate (GPM): NA
- h) Manufacturer: Carter Day i) Model Number: 72 RJ 48
- j) Installation Date: 1992

[illegible]

4.1 General Control Device Information

a) Unit ID Number: DC 2 b) Company Designation: Small dust Collector

c) Used By Sources: B1

d) Type: Fabric collector

e) Pressure Drop in H₂O: 1 in. wg. f) Estimated Capture Efficiency: 99.999%

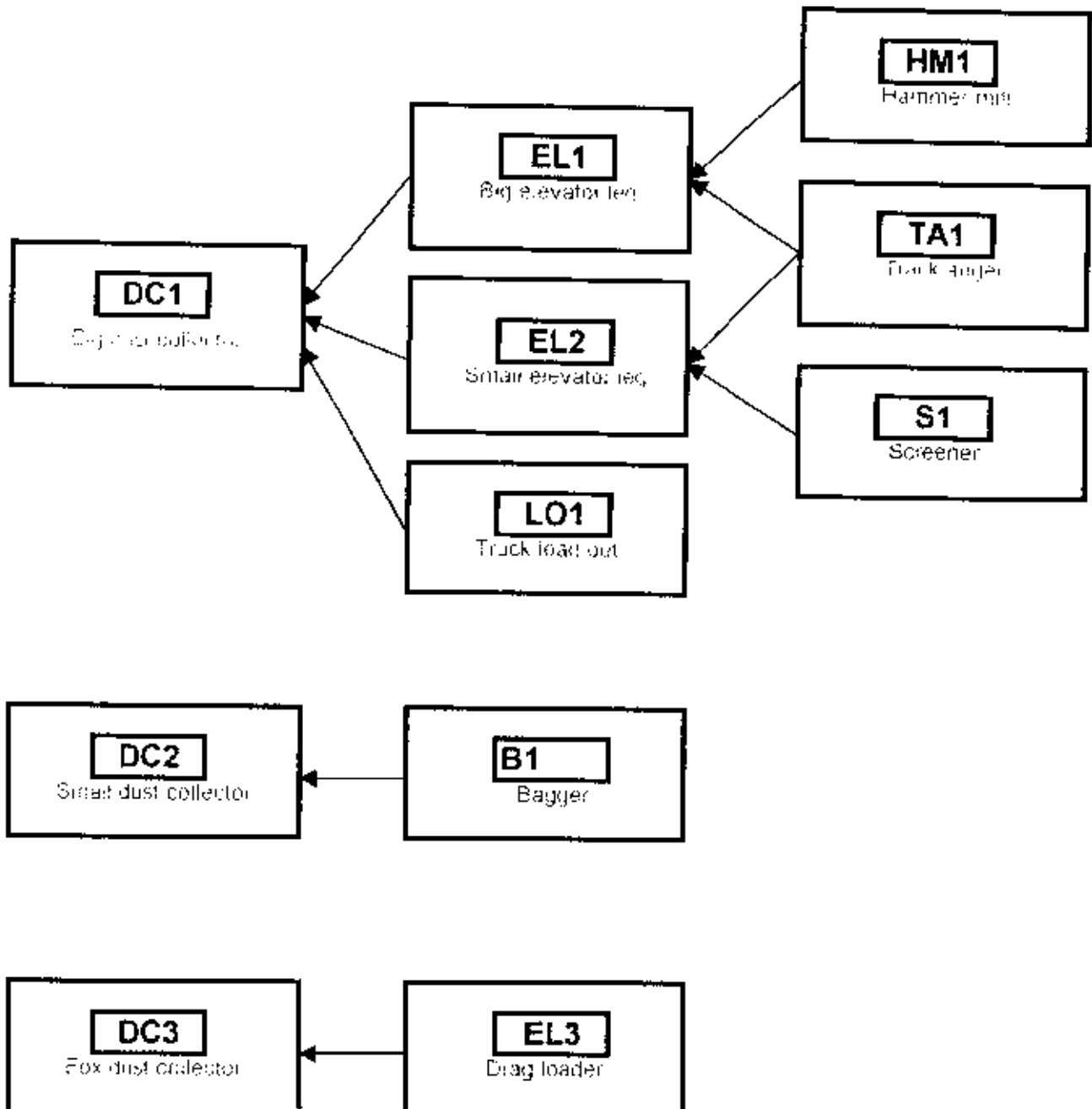
g) Scrubber Fluid Flow Rate (GPM): NA

h) Manufacturer: Carter Day i) Model Number: 12 LRV 24

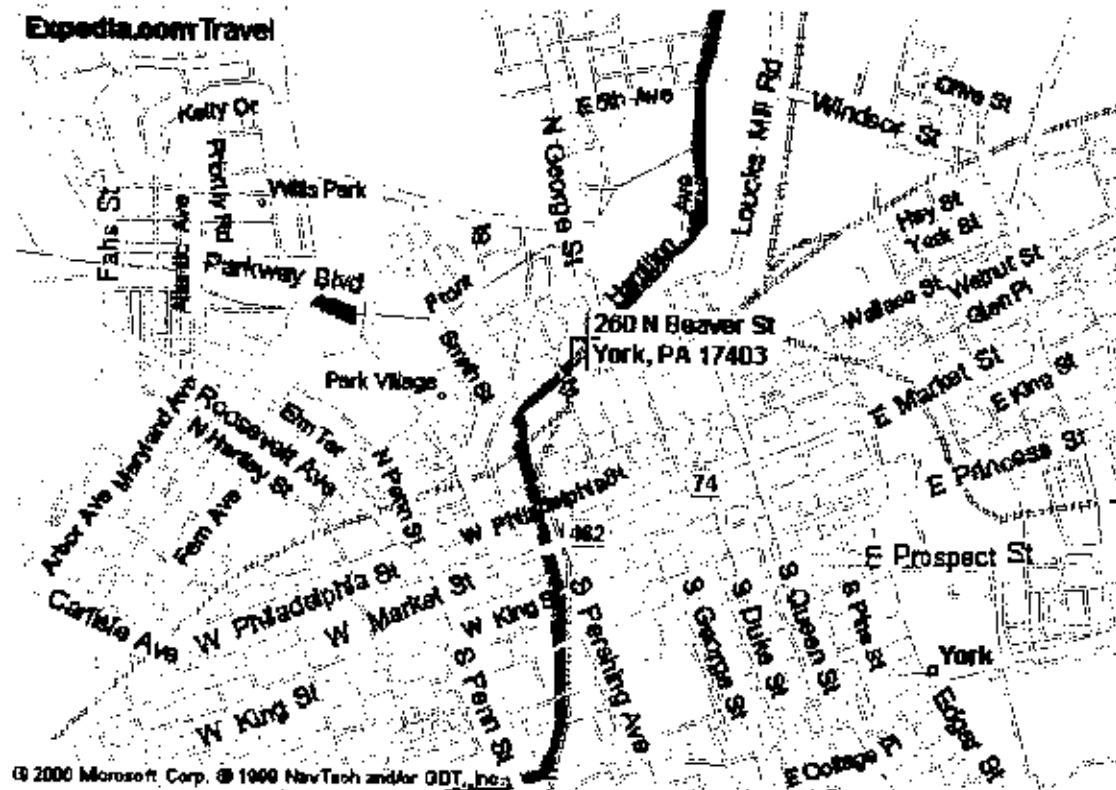
j) Installation Date: 1988

[illegible]

Flow Chart



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