

February 1, 2010

92-002-202

Mr. Robert Lewis  
Pennsylvania Department of Environmental Protection  
2 Public Square  
Wilkes-Barre, PA 18711-0770

RE: January 25, 2010 Non-Compliance Report  
NPDES Permit No. PAI023508001  
Marjol Battery Site, Throop, Pennsylvania

Dear Mr. Lewis:

Advanced GeoServices, on behalf of Gould Electronics, submits the enclosed Non-Compliance Report for discharge activities that occurred on January 25, 2010 at the Marjol Battery Site (Site) in Throop, Pennsylvania. Gould Electronics and SCE Environmental Group, the Contractor, are co-permittees for NPDES Permit No. PAI023508001. This report was prepared as required by Part A, Section 2.b of the permit. Corrective Measures at the Site are being conducted as required by the Final Administrative Order on Consent between U.S. Environmental Protection Agency (USEPA), Pennsylvania Department of Environmental Protection (PADEP) and Gould Electronics. Work activities are conducted in accordance with the Final (100%) Remedial Design approved by USEPA and PADEP on June 9, 2008 and NPDES Permit No. PAI023508001.

#### Non-Compliant Discharge Event

During a rain event on January 25, 2010, an erosion and sediment control (E&S) inspection was performed at the Marjol site by Advanced GeoServices and SCE. At approximately 1445 Advanced GeoServices performed a daily discharge turbidity reading at the discharge point (perimeter fence at the sediment basin discharge channel) and observed a turbidity reading of 1,785 NTUs, which is in excess of the 250 NTU performance standard. Based on this reading, Advanced GeoServices and SCE reviewed the outlet structure and skimmer in the basin and observed that the skimmer head had separated from the skimmer arm. The skimmer arm had submerged below the surface and was discharging water from the lower portions of the basin. SCE raised the skimmer arm to prevent further discharge from the basin. The level of water within the basin at this time was approximately 3 feet above the skimmer orifice. Attached are pictures of the discharge, Sulphur Creek and Lackawanna River during the time of the event.

During a site inspection on January 22, 2010, Advanced GeoServices observed the skimmer was intact. The water in the basin was frozen and the water level was approximately 12 to 16 inches below the outlet structure /skimmer orifice. It is assumed that the skimmer head and skimmer arm separated due to thawing and movement of ice within the basin.

Advanced GeoServices collected two water samples on January 25, 2010 at approximately 1540 from the discharge point for total and dissolved lead analysis. The samples were sent to Test America Pittsburgh for analysis and the results were received on January 29, 2010. An additional turbidity reading was performed at the time of sampling and the reading was 2,183 NTUs. The total

Mr. Robert Lewis  
92-002-202  
February 1, 2010  
Page 2 of 3



lead results are provided below. The dissolved lead result is also provided and is less than the NPDES permit standard for maximum dissolved lead (650 µg/L). Preliminary laboratory results are attached. Data validation is not yet complete.

Dissolved lead – 0.096 µg/L

Total lead – 64.4 µg/L

At approximately 1725 Additional turbidity readings were performed in the discharge channel, Sulphur Creek and Lackawanna River on January 25, 2010. These readings are provided below.

- Discharge Channel at Sulphur Creek (rip rap apron) – 1,840 NTUs, 1,918 NTUs
- Sulphur Creek approximately 25 feet downstream of discharge channel – 168 NTUs, 145 NTUs, 112 NTUs
- Sulphur Creek approximately 15 feet upstream of discharge channel – 93.9 NTUs, 90 NTUs
- Confluence of Sulphur Creek and Lackawanna River – 119 NTUs, 116 NTUs
- Lackawanna River Approximately 15 feet downstream of confluence of Sulphur Creek – 132 NTUs

#### Verbal Notifications

John Mellow of PADEP and Joe Hollshwander of U.S. Army Corps of Engineers (USACE) were notified on January 25, 2010 during the discharge. The notification to Mr. Mellow happened at approximately 1500 on the site and he in turn notified Mr. Hollshwander by telephone. Mr. Tim Matechak of Lackawanna County Conservation District was notified by telephone on January 26, 2010.

#### Follow-Up Repair

On January 26, 2010, SCE repaired the skimmer by reattaching the skimmer arm to the skimmer head and gluing with PVC bonding material in order for the skimmer to remain functional until basin conversion. Additionally, SCE tied a rope to the skimmer arm to allow a quick retrieval if similar circumstances arise. Following the repair, SCE tested the skimmer to ensure it was functioning properly. Advanced GeoServices was present to observe the resumed discharge. As the discharge was observed to be in compliance with the 250 NTU turbidity limit, the skimmer was allowed to continue operating.

Advanced GeoServices performed additional turbidity readings on January 26, 2010 at the surface of the basin and at the discharge point during continued discharge from the repaired skimmer. These readings are provided below:

#### Basin Readings

50.9 NTUs	39.6 NTUs	40.3 NTUs	41.6 NTUs
52.2 NTUs	38.4 NTUs	35.8 NTUs	57.0 NTUs
40.9 NTUs	37.2 NTUs	40.7 NTUs	84.5 NTUs

Mr. Robert Lewis  
92-002-202  
February 1, 2010  
Page 3 of 3



Discharge at Pipe Reading – 59.9 NTUs

Site Perimeter Discharge – 65.1 NTUs

Conclusions

As the turbidity readings indicate, the repaired skimmer is functioning properly and discharge is in compliance with the 250 NTU project performance standard. SCE and Advanced GeoServices will continue to monitor the system to confirm continued compliance.


We anticipate this letter will address PADEP's concerns. If there are any questions, please contact Kevin O'Rourke at (610) 840-9159 or Barb Forslund at (610) 840-9145.

Sincerely,

ADVANCED GEOSERVICES



Kevin O'Rourke  
Advanced GeoServices Field Coordinator



Barbara L. Forslund, P.E.  
Advanced GeoServices Project Coordinator

KO:BLF:kk

Enclosure

cc: L. Ayers  
M. Baltrusaitus  
R. Collings  
J. Cordaro  
J. Cronmiller  
J. DiJoseph  
M. Essenthier  
R. Hivner  
T. Matechak  
B. Mackowski  
C. Reitman  
T. Rich  
L. Zelinka  
Throop Borough Council

# **PRELIMINARY LABORATORY RESULTS**



# PICTURES



Skimmer arm above water surface 01-25-10



Sulphur Creek downstream of discharge channel 01-25-10



Confluence of Sulphur Creek and Lackawanna River 01-25-10



Basin discharge into discharge channel 01-25-10



Basin discharge channel 01-25-10