

April 6, 2010

92-002-202

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

RE: March 31, 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 March 30 and 31, 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.

Sequence of Events

March 30, 2010: Prior to the rain event, SCE had pumped water from the basin into Areas A and B in order to prepare for basin sediment removal. There was approximately 1.5 to 2 feet of water in the basin prior to the rain event. Rain began first thing in the morning and was steady throughout the day. Rainfall totaled approximately 1.6 inches for the storm event (see attached weather information). Advanced GeoServices monitored the basin throughout the day, and the continued pumping removed more water than was flowing into the basin. Advanced GeoServices was offsite at 1615.

Later that evening, Advanced GeoServices received notification from SCE that the water elevation in the basin had risen rapidly and was approaching the top of the baffle. Advanced GeoServices mobilized to the Site at 1925 to assess the situation. At this time, the skimmer was rotated to prevent flow out of the basin. However, Advanced GeoServices observed a slight flow through the discharge channel and obtained a turbidity reading at the discharge point of 77 NTUs. Advanced GeoServices performed additional turbidity readings within the basin and proximate to the skimmer. The results are provided below.

- 241 NTUs
- 253 NTUs
- 236 NTUS
- 245 NTUS
- 249 NTUS
- 257 NTUS



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- 305 NTUS
- 296 NTUS
- 268 NTUS
- 317 NTUS

Due to the readings being near the performance standard of 250 NTUs, Advanced GeoServices requested that SCE apply Pond Clear to the area surrounding the skimmer. At 2035, the skimmer was rotated to allow flow, and another turbidity reading was taken at the discharge point at 2045. The result was 330 NTUs. Advanced GeoServices immediately rotated the skimmer to prevent flow. No additional activities were performed as the basin pumping kept pace with the flow into the basin.

March 31, 2010: Advanced GeoServices returned to the Site at 0800 and inspected the discharge channel. A slight flow was present and a turbidity reading of 330 NTUs was obtained. Advanced GeoServices requested SCE install a line of hay bales at the perimeter fence in the discharge channel to filter sediment and apply Pond Clear in the channel. At 0930, an additional turbidity reading was taken and the result was 324 NTUs. Samples were collected at that time for total and dissolved lead as per the Sampling and Analysis Plan and shipped to Test America-Pittsburgh for analysis on a two-week turnaround time.

In order to stop the discharge, Advanced GeoServices requested that SCE plug the skimmer orifice inside the outlet structure using a rubber well plug. SCE observed that there was still a small leak entering the outlet structure around the skimmer orifice plate. Once the plug was in place, the flow into the discharge channel was reduced by approximately 90%.

Additional turbidity readings were obtained at 0900 in the basin on the western side of the baffle and are provided below.

- 352 NTUs
- 289 NTUs
- 268 NTUs
- 324 NTUs
- 319 NTUS
- 257 NTUs
- 301 NTUs
- 296 NTUs
- 285 NTUs
- 310 NTUs

Based on the readings obtained, the skimmer remained in the position to prevent flow. As the water elevation in Area B was approaching overflow conditions, SCE relocated the filter bag so that all the pumped water would be sent to Area A.

At 1100, Advanced GeoServices reviewed the discharge at the confluence of the Site discharge channel and Sulphur Creek. Two turbidity readings were taken and the results were 152 and 158 NTUs. Additional hay bales were placed outside the perimeter fence. SCE continued to pump water from the



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basin into Area A. At approximately 1300, Advanced GeoServices observed that all flow in the discharge channel had ceased.

Follow-Up

Based on observations, it was determined that the leak into the outlet structure was coming from the skimmer arm and orifice. Once the water has been pumped below the orifice elevation, the skimmer and orifice will be repaired to prevent further leaks into the structure.

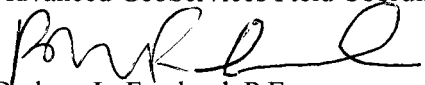
In order to prevent turbid flow through the discharge channel, the sediment in the basin will be removed and flow will be prevented until turbidity readings show surface water levels below the performance standard.

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:vm

Enclosures

cc: L. Ayers
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J. DiJoseph
M. Essenthier
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T. Matechak
B. Mackowski
C. Reitman
T. Rich
L. Zelinka
Throop Borough Council



RAINFALL INFORMATION

DATE	HOUR	Outside Temp.	Out Humidity	Pressure	Rainfall	Wind Dir	Wind Speed
3/30/2010	0:00	42	83		0.05	0	4
3/30/2010	0:20	41	83		0	0	5
3/30/2010	0:40	40	83		0	30	4
3/30/2010	1:00	40	83		0	135	4
3/30/2010	1:20	40	83		0	315	3
3/30/2010	1:40	39	83		0	315	3
3/30/2010	2:00	39	83		0	315	3
3/30/2010	2:20	39	83		0	315	3
3/30/2010	2:40	39	83		0	150	4
3/30/2010	3:00	39	83		0	45	4
3/30/2010	3:20	39	83		0	0	3
3/30/2010	3:40	39	83		0	165	3
3/30/2010	4:00	39	83		0	180	3
3/30/2010	4:20	39	83		0	45	3
3/30/2010	4:40	39	83		0	60	2
3/30/2010	5:00	39	83		0	150	3
3/30/2010	5:20	39	83		0	315	4
3/30/2010	5:40	39	83		0	105	3
3/30/2010	6:00	39	83		0	7	3
3/30/2010	6:20	39	83		0	22	2
3/30/2010	6:40	38	83		0	37	3
3/30/2010	7:00	38	83		0	45	3
3/30/2010	7:20	38	83		0.01	45	2
3/30/2010	7:40	38	83		0.01	240	3
3/30/2010	8:00	38	83		0.01	330	3
3/30/2010	8:20	37	84		0.02	315	3
3/30/2010	8:40	37	84		0.02	150	4
3/30/2010	9:00	37	84		0.03	52	4
3/30/2010	9:20	37	84		0.04	22	4
3/30/2010	9:40	37	83		0.05	232	3
3/30/2010	10:00	37	83		0.08	330	3
3/30/2010	10:20	37	83		0.11	315	3
3/30/2010	10:40	37	83		0.14	330	3
3/30/2010	11:00	37	83		0.17	313	5
3/30/2010	11:20	37	83		0.2	315	3
3/30/2010	11:40	37	83		0.21	281	2
3/30/2010	12:00	37	83		0.22	247	1
3/30/2010	12:20	37	83		0.22	212	1
3/30/2010	12:40	37	83	17.16	0.23	247	0
3/30/2010	13:00	37	83	29.07	0.29	259	1
3/30/2010	13:20	37	83		0.35	0	4
3/30/2010	13:40	36	83		0.43	0	3
3/30/2010	14:00	36	83		0.5	37	4
3/30/2010	14:20	37	83		0.57	112	5
3/30/2010	14:40	37	83		0.62	127	4
3/30/2010	15:00	37	83		0.69	202	4
3/30/2010	15:20	37	83		0.76	337	3
3/30/2010	15:40	37	83		0.81	217	4
3/30/2010	16:00	37	83		0.86	120	3
3/30/2010	16:20	36	83		0.9	45	2
3/30/2010	16:40	36	83		0.95	225	3
3/30/2010	17:00	36	83		1.01	225	2
3/30/2010	17:20	35	82		1.07	45	1

3/30/2010	17:40	34	82		1.12	195	2
3/30/2010	18:00	34	82		1.16	285	2
3/30/2010	18:20	35	82		1.19	315	2
3/30/2010	18:40	34	82		1.22	105	2
3/30/2010	19:00	33	82		1.26	15	2
3/30/2010	19:20	34	82		1.31	45	3
3/30/2010	19:40	34	82		1.36	105	2
3/30/2010	20:00	34	82		1.41	195	2
3/30/2010	20:20	34	82		1.44	315	2
3/30/2010	20:40	35	82		1.46	105	2
3/30/2010	21:00	35	82		1.48	0	2
3/30/2010	21:20	36	82		1.5	0	2
3/30/2010	21:40	36	82		1.51	150	1
3/30/2010	22:00	36	82		1.53	262	1
3/30/2010	22:20	37	82		1.54	337	2
3/30/2010	22:40	37	82		1.55	112	2
3/30/2010	23:00	37	82		1.57	15	2
3/30/2010	23:20	37	82		1.59	45	1
3/30/2010	23:40	37	82		1.6	30	2