

AR file - 12

232911

29TH DISTRICT  
JAMES J. RHOADES

PLEASE REPLY TO:

SENATE RO. BOX 203029  
THE STATE CAPITOL  
HARRISBURG, PA 17120-3029  
PHONE: (717) 787-2627  
FAX: (717) 783-0148

32 E. CENTRE STREET  
MAHANOCY CITY, PA 17048  
PHONE: (870) 773-0891  
(870) 821-3413  
FAX: (870) 459-2821



Senate of Pennsylvania

COMMITTEES

EDUCATION, CHAIRMAN  
AGING AND YOUTH  
APPROPRIATIONS  
ENVIRONMENTAL RESOURCES AND ENERGY  
TRANSPORTATION

PHEAA BOARD OF DIRECTORS  
EDUCATION COMMITTEE OF NCSL  
COMMISSIONER, EDUCATION COMMISSION OF  
THE STATES  
SPECIAL COMMITTEE ON  
INTERSCHOLASTIC ATHLETICS, CHAIRMAN

November 19, 1999

Mr. Thomas C. Voltaggio  
Acting Regional Administrator  
U.S. Environmental Protection Agency  
1650 Arch Street  
Philadelphia, PA 19103

Dear Mr. Voltaggio:

I was recently contacted by Mr. Daniel A. Pinkey, Rush Township Environmental Advisory Council, regarding the Diversified Metals Superfund Site in Hometown, Schuylkill County. Enclosed are copies of a letter and related correspondence, along with a Fluff sample for your review.

As you can see by the enclosed correspondence, Mr. Pinkey has been working toward a resolution to this problem for many years. Mr. Pinkey feels it is a matter of the health and safety of the citizens versus the company saving money.

I would greatly appreciate your advising me of the latest developments concerning this most vital regard.

Sincerely,

JAMES J. RHOADES  
State Senator

JJR/mah

Enclosures

cc: Mr. Daniel Pinkey, Chairman

AR500043

**RUSH TOWNSHIP ENVIRONMENTAL ADVISORY COUNCIL  
SCHUYLKILL COUNTY**

R.D. 1, Box 1326, Tamaqua, Pennsylvania 18252  
717-668-2938

November 8, 1999

State Senator James Rhodes  
32 East Center Street  
Mahanoy City, Pa. 17948

Dear Senator Rhodes:

Once again I am writing to you about a long-standing environmental problem in our area  
- The Diversified Metals Superfund Site in Hometown.

As you can see from the enclosed material, numerous agencies were informed of this environmental threat starting in 1968. The initial alarms went unheeded and before long a huge problem developed. In the enclosures are some very helpful letters from your office; had others been as concerned, perhaps the mess would not have grown to its present size. We now face the possibility that the toxic pile will remain here forever.

Please use your good offices to compel Lucent Technologies, the responsible party to have this material disposed of safely. It must not remain as a perpetual threat to the Little Schuylkill River and the Pennsylvania State Game Lands #227.

Almost every week Lucent announces big communications technology breakthroughs. They should not be allowed to underwrite that progress by pushing their environmental costs onto the public. Sweeping the Diversified Metals Dump under a high-tech rug is not an acceptable solution.

Thank you for your continuing efforts for a better environment,

  
Daniel A. Pinkey, Chairman

enclosures

AR500044

**Enclosures:**

- **Fluff Sample**
- **Site Location Map**
- **Site Status Report - EPA**
- **Initial Report to Pa. Dept. of Health (and Response)**
- **Report to Schuylkill County Commissioners (and Response)**
- **Report of Meeting - Tamaqua Industrial Development Enterprises (T.I.D.E.)**
- **Report to DRBC (and Response)**
- **Report to Pa. Game Commission (and Response)**
- **Report to Pa. Fish Commission (and Response)**
- **DER Response to Pa. Fish Commission**
- **Report to EPA (Initial)**
- **Report to Pa. Dept. of Mines (and Response)**
- **DER Referral to Strike Force**
- **Rush Twp. Environmental Advisory Council - Site Tour Arrangements**
- **Theodore Sall - Site Study (and Comments)**
- **State Senator Rhoades - Response to Inquiry**
- **Tech Law and EPA - Site Information Requests**
- **Article: "PCB's - Prevalent and Persistent" - Environmental Science and Technology**
- **Article: "New Pollutant Stirs Fears of DDT Crisis" - Philadelphia Inquirer**
- **Article: "A New Horatio Alger Tale" - New York Times**
- **"Under the Rug" - Washington Post**

AR500045

**RUSH TOWNSHIP ENVIRONMENTAL ADVISORY COUNCIL  
SCHUYLKILL COUNTY**

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717-668-2938

November 8, 1999

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32 East Center Street  
Mahanoy City, Pa. 17948

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Thank you for your continuing efforts for a better environment,

  
Daniel A. Pinkey, Chairman

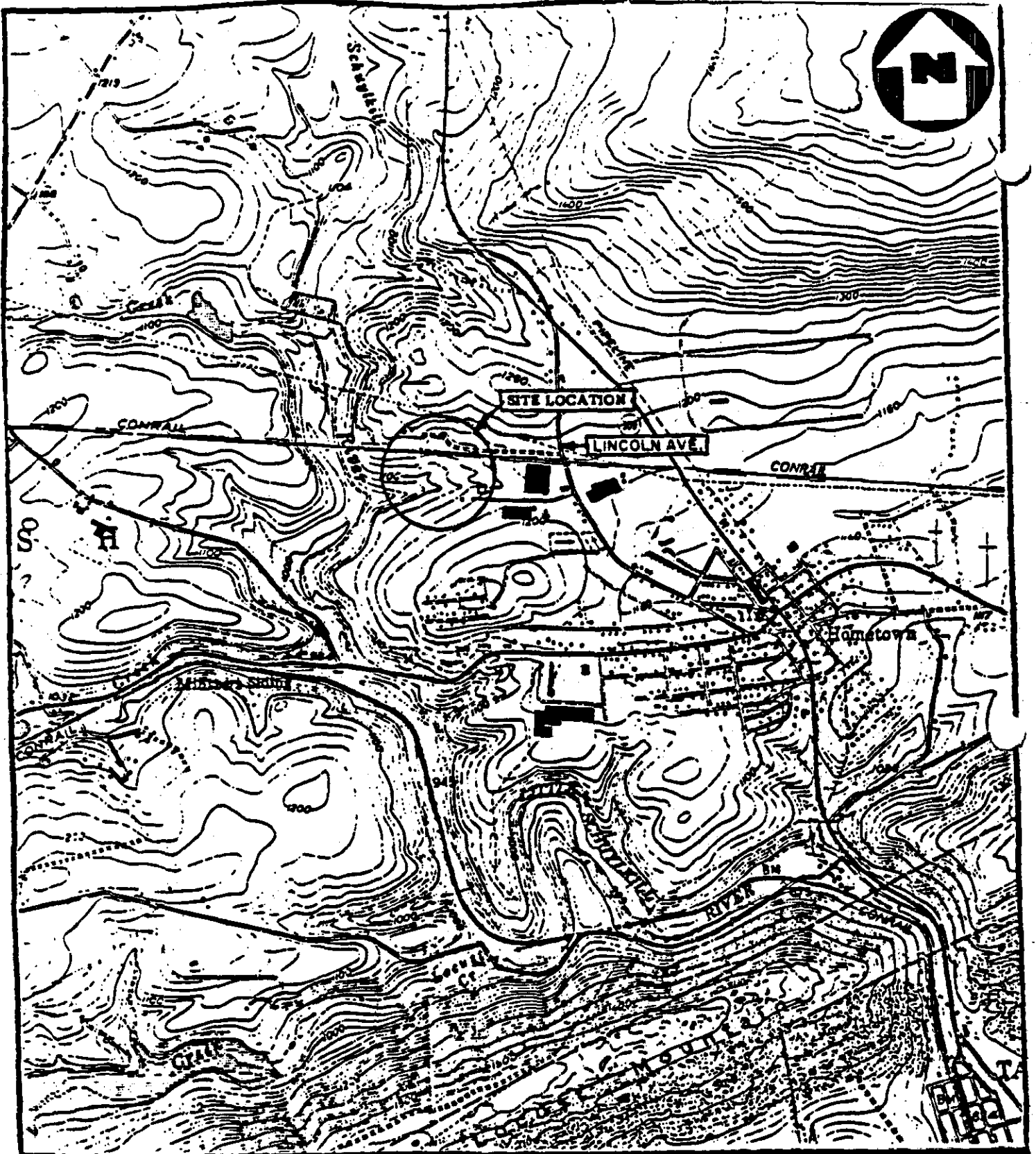
enclosures

AR500046

**Enclosures:**

- **Fluff Sample**
- **Site Location Map**
- **Site Status Report - EPA**
- **Initial Report to Pa. Dept. of Health (and Response)**
- **Report to Schuylkill County Commissioners (and Response)**
- **Report of Meeting - Tamaqua Industrial Development Enterprises (T.I.D.E.)**
- **Report to DRBC (and Response)**
- **Report to Pa. Game Commission (and Response)**
- **Report to Pa. Fish Commission (and Response)**
- **DER Response to Pa. Fish Commission**
- **Report to EPA (Initial)**
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- **"Under the Rug" - Washington Post**

AR500047



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

**EASTERN DIVERSIFIED METALS**  
**Site Location Map**  
 ( no scale )

Figure # 1



AR500048

44

# **EASTERN DIVERSIFIED METALS**

**PENNSYLVANIA**  
EPA ID# PAD980830533

**EPA REGION 3**

Schuylkill County  
Rush Township

**6th Congressional District**

Last Updated: May 1999

## **Current Site Status**

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Work to control and contain leachate as well as stormwater runoff is already finished. The site treatment plant (for leachate and stormwater) has been upgraded and expanded. A biological treatment system was added to this plant. A new stormwater treatment system has been built. Contaminated debris was removed.

Work to remove hot spots of contamination from the waste pile is nearing completion. Remaining work involves deciding how to address the main waste pile and removing the sediments at the Site.

## **Site Description**

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The 25-acre Eastern Diversified Metals site is a former wire recycling facility. From 1966 to 1977, the company disposed of approximately 350 million pounds of "fluff" (waste insulation material) in an open pile. This fluff comes from stripping the coverings off of copper wire. The fluff disposal pile is approximately 40 feet high, 250 feet wide, and 1,500 feet long. In 1974, the company installed a wastewater treatment plant, diversion ditches, retention basins, and an interceptor trench that diverts shallow groundwater to the treatment plant. The surface impoundments associated with the wastewater treatment plant had overflowed at times into a tributary to the Little Schuylkill River. Three miles downstream of the site, the Little Schuylkill River is used for trout fishing and other recreational activities. The site is underlain by the Mauch Chunk Formation, one of the most important water-bearing formations in Northeastern Pennsylvania. Approximately 1,400 people are served by wells that are within 3 miles of the site and draw on the Mauch Chunk Formation for their water supply. There are about 1,600 people living within a 1-mile radius of the site. The distance from the site to the nearest residence is approximately 1,000 feet.

### **Site Responsibility:**

Cleanup of this site is the responsibility of Federal and State governments, and parties potentially responsible for site contamination (PRPs).

### **NPL Listing History:**

This site was proposed to the National Priorities List of the most serious uncontrolled or abandoned hazardous waste sites requiring long-term cleanup action on June 1, 1986. The site was formally added to the list on October 4, 1989, making it eligible for federal cleanup funds.

AR500049

**Remainder of the Site:** The final remedy for the remainder of the site was selected in July 1992. EPA's decision called for recycling the fluff. The fluff consists of polyvinyl chloride and polyethylene (plastic chips) metal, fibrous material, paper, soil and clay. A pre-design study was completed in November of 1994. Treatment tests and a pilot study on fluff separation and recycling were finished in late 1995 and early 1996. Some of the fluff fractions separated during the treatment tests contained PCBs at levels of concern. On June 17, 1997 the PRP signed an agreement with EPA, consenting to carry out a study (Focused Feasibility Study, or FFS) to determine other ways to address the fluff pile. The draft FFS was submitted to EPA in August 1998. The draft FFS evaluated options including onsite excavation, treatment and offsite disposal of the fluff. In late August 1998 the PRP submitted a second document to EPA that outlined a remedy of in-place closure or capping of the main fluff pile at the Site. EPA is currently reviewing and evaluating the FFS and the second document submitted by the PRP. In response to EPA's technical concerns regarding the feasibility of onsite closure, the PRP conducted studies in the Spring of 1999 which showed that onsite closure is technically viable. During this timeframe, several elected officials have expressed opposition to onsite closure. EPA plans to issue a new Record of Decision before the end of this year.

## **Contacts**

---

### **Remedial Project Manager**

**Frank Vavra**  
215-814-3221  
vavra.frank@epa.gov

### **Community Involvement Coordinator**

**Lisa Brown**  
215-814-5528  
brown.lisa@epa.gov

Detailed public files (Administrative Record) on EPA's involvement and decisions at this site can be examined at the following locations:

**Rush Township Municipal Building**  
Route 54  
Hometown, PA 18252

**U.S. EPA Region III**  
Superfund Docket Room  
1650 Arch Street  
Philadelphia, PA 19103-2029  
(215) 814-3157

**AR500050**



DRAFT

R. D. 2, Hometown  
Tamaqua, Pa. 18252  
October 24th, 1968

Regional Sanitary Engineer  
Pennsylvania Department of Health  
401 Buttonwood Street  
West Reading, Pa, 19602

Sir:

I wish to report the pollution of an unnamed tributary of the Little Schuylkill River at Hometown in Schuylkill County. The stream enters the Little Schuylkill about 0.2 miles below the bridge of the Central Railroad of New Jersey at an elevation of about 1020 feet. This stream is not shown on the Tamaqua and Delano Quadrangle maps of the U.S.G.S.; it drains a small valley bounded by L.R. 53217, the Central Railroad of New Jersey, State Game Lands No. 227 and Tidewood Industrial Park.

The source of the pollution is the open dump of the Eastern Diversified Metals Corp. located just off L.R. 53217 at an elevation of about 1160 feet. (See enclosed slides.) The pollutants are the waste from a copper salvage operation and consist of shredded paper, rubber, plastic, copper and aluminum. (see enclosed samples.)

The Rush Township Supervisors have attempted to stop this open dumping. Their efforts ended with the Eastern Diversified assertion that they are conducting a sanitary landfill operation and would continue to do so. This open dump not only causes stream pollution, but also constitutes a fire hazard. In the spring of 1967 the dump was ignited by burning trash and we had a preview of possible future disaster. The noxious fumes and melting tendency of the burning material made fire suppression difficult. The melting resulted in a burning effect similar to that of an oil fire. (See enclosed slide.) This is especially dangerous because the dump is up slope from the woods of State Game Lands No. 227.

It seems that your agency is the only one that can compel Eastern Diversified to run a sanitary landfill instead of an open dump. It is very discouraging to see a new industry following in the footsteps of our old industry here in the Anthracite Region. We have not yet cleaned up the long-standing mine drainage and municipal sewage pollution of the Little Schuylkill and already additional burdens are being placed on this ravaged stream. Tolerance of this added biological insult can only prolong and complicate the task of stream restoration.

If you should require any further information or assistance in solving this problem, please feel free to contact me.

Very truly yours,

Daniel A. Pinkney

AR500051

## COMMONWEALTH OF PENNSYLVANIA



## DEPARTMENT OF HEALTH

THOMAS W. GEORGES, JR., M.D.  
SECRETARY OF HEALTH

401 Battenwood Street  
West Reading, Pennsylvania 19607  
October 29, 1968

Industrial Wastes  
Rush Township  
Schuylkill County  
Eastern Diversified Metals

H. S. Region II  
West Reading Office

Mr. Daniel A. Pinkey  
R. D. #2, Hometown  
Tamaqua, Pennsylvania 18252

Dear Mr. Pinkey:

Acknowledgment is made of receipt of your letter of October 24, 1968, concerning pollution of a tributary to the Little Schuylkill River and also the operation of a dump by the Eastern Diversified Metals Plant located in Hometown. Your letter also transmitted a sample of the waste product from this plant as well as five 2" x 2" color slides.

This office had been aware of the location of this plant at Hometown and inspections had been made over a year ago at which time there was no evidence of stream pollution from their operation. However, since they were piling the waste material which was removed from the wire on their property and this practice could be a source of possible stream pollution in the future from seepage or runoff from the stock pile, a letter had been sent to the Company requesting that they provide some other means of disposal for this material. Since receipt of this new letter of complaint we will conduct a reinspection at the plant for the purpose of determining whether or not stream pollution exists and whether the operation of the dump is satisfactory. Upon completion of our investigation, we will give you a further report on the results of our investigation.

Very truly yours,

Charles H. Kuder  
Assistant Regional Sanitary Engineer  
Operations

CHK:rd

AR500052

## COMMONWEALTH OF PENNSYLVANIA



## DEPARTMENT OF HEALTH

THOMAS W. GEORGES, JR., M.D.  
SECRETARY OF HEALTH

401 Buttonwood Street  
West Reading, Pennsylvania 19602  
November 22, 1968

Industrial Wastes  
Rush Township  
Schuylkill County  
Eastern Diversified Metals

H. S. Region II  
West Reading Office

Mr. Daniel A. Pinkey  
R. D. #2, Hometown  
Tamaqua, Pennsylvania 18252

Dear Mr. Pinkey:

This letter is a follow-up to my letter of October 29, 1968, to you concerning your complaint letter of pollution on a tributary to the Little Schuylkill River from the operation of a dump by the Eastern Diversified Metals plant located in Hometown.

A reinspection of this plant and the waste pile was made on November 6, 1968. At the time of this inspection, it was found that this Company has no liquid waste water originating from its plant to be disposed of which would create stream pollution. The Company operates a dry process for the removal of the insulation from the used copper wire. This fluff material which is removed is disposed on the Company property on a long pile. The Company is attempting to place a cover over this material to prevent it from blowing around since most of this material is a light fluff material.

Our inspection around the disposal pile revealed that there is no seepage of water through the pile which would carry contaminants to the Little Schuylkill River. Our one inspection was the day following a heavy rainfall and no gullies or washouts were observed, however, there were several small puddles of water below the pile.

At the present time, the Pennsylvania Department of Health has no control over the operation of existing landfills or refuse piles so long as they do not directly pollute waters of the Commonwealth. The Company is again being cautioned by this office to cover this material to prevent rainfall from entering the pile

AR500053

Mr. Daniel A. Pinkey


- 2 -

November 22, 1968

and also to prevent winds from blowing the fluffy material. The Company is also being cautioned to take all possible steps to prevent the possibility of any runoff of water from the pile or the surrounding area which might contaminate any stream.

I am returning the five colored slides which you had forwarded along with your letter of October 24, 1968. You did not specifically request for their return, however, I assume that these are the only copies which you have. If you should in the future see any evidence or have any proof there is direct pollution to waters of the Commonwealth from this operation, then it would be appreciated if you would immediately recontact this office. We will, however, continue to make reinspections at this plant as time and conditions warrant.

Very truly yours,



Charles H. Kuder  
Assistant Regional Sanitary Engineer  
Operations

CHK:rd

Enclosures

AR500054

(copy)

R.D.2  
Tamaqua, Pa. 18252  
December 5th, 1970

Mr. Charles H. Kuder  
Assistant Regional Sanitary Engineer  
Pennsylvania Department of Health  
1401 Arch Street, Room 51  
Reading, Pennsylvania 19602

Dear Mr. Kuder:

I am writing to you in regard to continued pollution of the Little Schuylkill River through an unnamed tributary that drains the property of the Diversified Metals Corporation at Hometown, Rush Township, Schuylkill County.

Shredded insulation, a waste from this copper wire salvage operation, is washing into the stream as a result of improper dumping. The material is very evident as one follows the stream from the eastern boundary of State Game Lands #227 to the Little Schuylkill River. One can see bits of insulation in the stream bed, along the stream and floating on the surface of the water. Another small stream is conducted across and beneath the dump through an unsupported ditch covered with the ends of cable spools, about four inches of untreated wood; this is not an adequate, long-term, pollution-free method.

In addition to the sedimentation, there is the possibility of chemical pollution by constituents of electrical insulation, polychlorinated biphenyls. Dr. Carl G. Gustafson has discussed these compounds and their hazards at some length in the October issue of "Environmental Science and Technology". The high persistence and chronic toxicity of the polychlorinated biphenyls which are similar to that of DDT are a serious problem. The possibility that this dump may be a source of these compounds warrants further investigation.

Diversified should be stopped from allowing their wastes from entering the river in any quantity. A recent contract let by the Department of Mines and Mineral Industries (to Martin Associates of King of Prussia) for a survey to determine the location and extent of pollution caused by mine drainage in the Upper Little Schuylkill River is a giant step in the restoration of this long-blighted stream. We should not permit new industries to operate in the same manner as the Anthracite Industry. There must be continuing concern for the environment and realization and assignment of the true costs involved in preserving or restoring it.

Very truly yours,

Daniel A. Pinkey

Enclosure: Sketch

PCB Article Delivered personally  
Dec 4th, 1970

AR500055

9

PIPELINE  
Tongue Water Authority

CATTESCHUNK RIVER

STATE GAME LANDS  
II  
927

SHIPPED INDUSTRIAL  
DEBRIS HERE

Dump Fall

Plant

PRIVATE ROAD

MINI STORAGE  
WOOD-CORRODED  
DRAINAGE  
DITCH

Diversified Metals  
Plant and Dump  
Homebun, Rush Run  
Schuylkill County, Pa.  
(NOT TO SCALE)

Intersection Rts 304 & 54

LR 53217

AR500056

R.D. 2, Hometown  
Tamaqua, Pa. 18252  
October 14th, 1970

Schuylkill County Commissioners  
Pottsville, Pa.

Gentlemen:

If you have not yet inspected the dumps at the Speedspace and Diversified Metals plants at Hometown, please do so.

Speedspace piles up their wastes and periodically burns them. This is not a suitable means of solid waste disposal.

Diversified has their wastes piled up in such a way that particles of shredded plastic are going into the Little Schuylkill via a small unnamed tributary. Pallets, steel drums, cable spools, and <sup>cardboard</sup> shredded plastics are piled together ~~in~~ <sup>in a</sup> <sup>way</sup> ~~in a manner~~ that makes it difficult to fight the fires that break out periodically. If your inspector looks at the manner in which water is conducted across and beneath the dump he will see an unsupported trench covered with the ends of old cable spools - about four inches of untreated wood; this is not a permanent solution. The dump is advancing toward State Game lands #227; prospects of a fire reaching this tract are frightening.

AR500057

It appears that Diversified does not find it necessary to conduct a proper landfill. If they are not compelled to clean up they will eventually present us with problems similar to those following in the wake of our declining Anthracite industry.

Massive pollution and destruction of our landscape were justified on the grounds that they were part of the price of creating jobs. The ~~was~~ Anthracite Industry has collapsed, the jobs have disappeared and we are left with a massive cleanup job. The corporations which did the damage have vanished and the public treasury must supply the funds for restoration.

Please use your <sup>authority</sup> ~~power~~ to prevent the new industries from wrecking our <sup>land</sup> ~~country~~ the way the old one did.

Yours for a cleaner, safer, <sup>schuylkill</sup> county.

Daniel A. Pinkney



ELMER JOHNSON, CHAIRMAN  
LEONARD THOMAS  
JOSEPH HOLDEN



WILLIAM D. HUTCHINSON, SOLICITOR  
JOHN A. KASALES, CHIEF CLERK

**COMMISSIONERS OF SCHUYLKILL COUNTY**  
POTTSVILLE, PENNSYLVANIA

October 15, 1970

*Daniel A. Pinkey  
R. D. 2, Hometown  
Tamaqua, Penna. 18252*

*Dear Mr. Pinkey:*

*We have received your letter of October 14, 1970 concerning  
the dumps at the Speedspace and Diversified Metal Plants at Hometown.*

*A copy of your letter has been sent to the Rush Township  
Supervisors, who may be able to help you with this problem.*

*Very truly yours,*

**BOARD OF COUNTY COMMISSIONERS**

**JOHN A. KASALES**  
*Chief Clerk*

*JAK/mr*



AR500059

**RUSH TOWNSHIP ENVIRONMENTAL ADVISORY COUNCIL  
SCHUYLKILL COUNTY**

R.D. 1, Box 1326, Tamaqua, Pennsylvania 18252  
717-668-2938

November 8, 1999

State Senator James Rhodes  
32 East Center Street  
Mahanoy City, Pa. 17948

Dear Senator Rhodes:

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- The Diversified Metals Superfund Site in Hometown.

As you can see from the enclosed material, numerous agencies were informed of this environmental threat starting in 1968. The initial alarms went unheeded and before long a huge problem developed. In the enclosures are some very helpful letters from your office; had others been as concerned, perhaps the mess would not have grown to its present size. We now face the possibility that the toxic pile will remain here forever.

Please use your good offices to compel Lucent Technologies, the responsible party to have this material disposed of safely. It must not remain as a perpetual threat to the Little Schuylkill River and the Pennsylvania State Game Lands #227.

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Thank you for your continuing efforts for a better environment,

  
Daniel A. Pinkey, Chairman

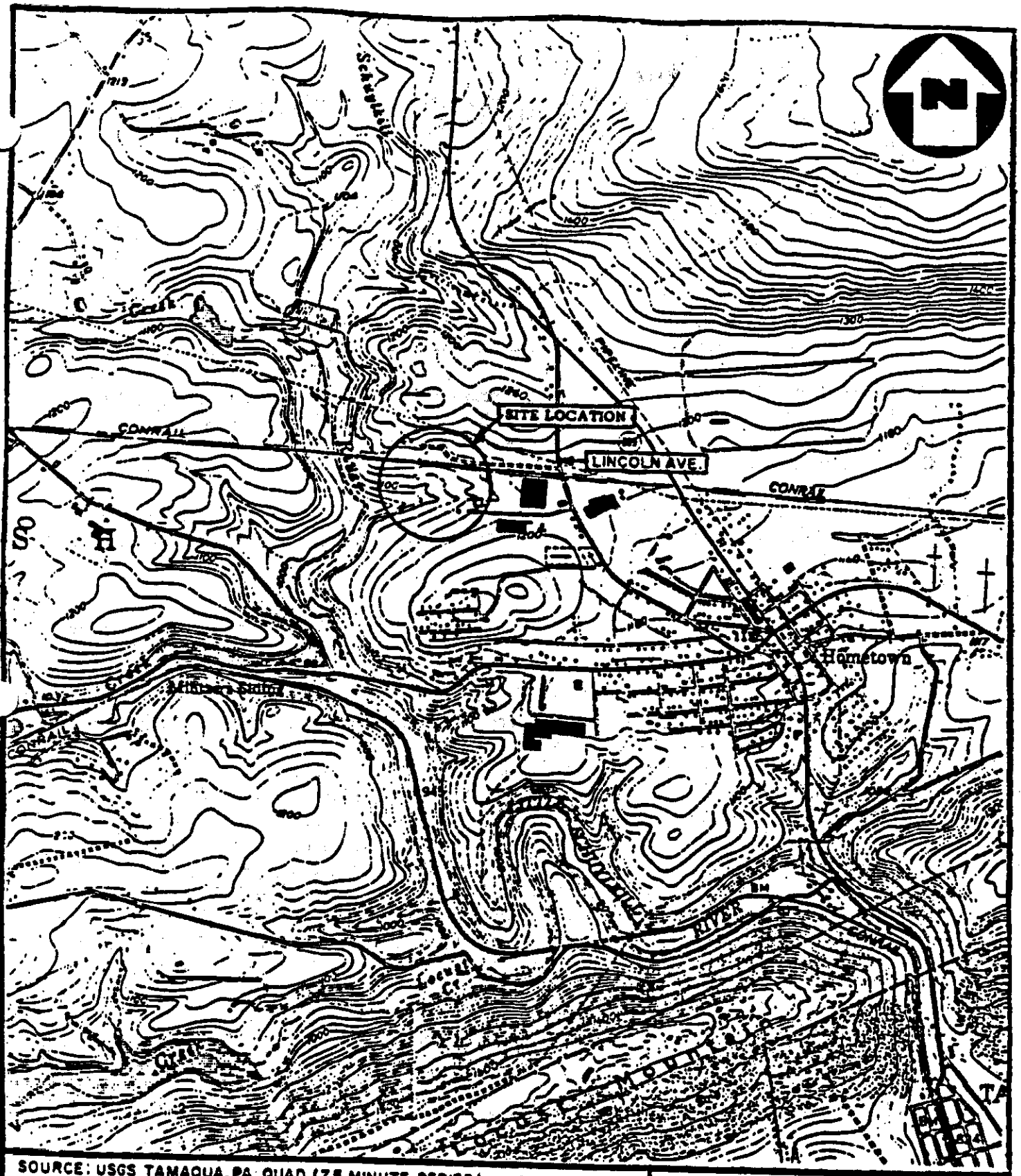
enclosures

AR500060

**Enclosures:**

- **Fluff Sample**
- **Site Location Map**
- **Site Status Report - EPA**
- **Initial Report to Pa. Dept. of Health (and Response)**
- **Report to Schuylkill County Commissioners (and Response)**
- **Report of Meeting - Tamaqua Industrial Development Enterprises (T.I.D.E.)**
- **Report to DRBC (and Response)**
- **Report to Pa. Game Commission (and Response)**
- **Report to Pa. Fish Commission (and Response)**
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- **Article: "New Pollutant Stirs Fears of DDT Crisis" - Philadelphia Inquirer**
- **Article: "A New Horatio Alger Tale" - New York Times**
- **"Under the Rug" - Washington Post**

**AR500061**



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

**EASTERN DIVERSIFIED METALS**

Site Location Map

(no scale)

Figure # 1

**NUS**  
CORPORATION

A Halliburton Company

AR500062

44

# EASTERN DIVERSIFIED METALS

PENNSYLVANIA  
EPA ID# PAD980830533

EPA REGION 3

Schuylkill County  
Rush Township

6th Congressional District

Last Updated: May 1999

## Current Site Status

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Work to control and contain leachate as well as stormwater runoff is already finished. The site treatment plant (for leachate and stormwater) has been upgraded and expanded. A biological treatment system was added to this plant. A new stormwater treatment system has been built. Contaminated debris was removed.

Work to remove hot spots of contamination from the waste pile is nearing completion. Remaining work involves deciding how to address the main waste pile and removing the sediments at the Site.

## Site Description

---

The 25-acre Eastern Diversified Metals site is a former wire recycling facility. From 1966 to 1977, the company disposed of approximately 350 million pounds of "fluff" (waste insulation material) in an open pile. This fluff comes from stripping the coverings off of copper wire. The fluff disposal pile is approximately 40 feet high, 250 feet wide, and 1,500 feet long. In 1974, the company installed a wastewater treatment plant, diversion ditches, retention basins, and an interceptor trench that diverts shallow groundwater to the treatment plant. The surface impoundments associated with the wastewater treatment plant had overflowed at times into a tributary to the Little Schuylkill River. Three miles downstream of the site, the Little Schuylkill River is used for trout fishing and other recreational activities. The site is underlain by the Mauch Chunk Formation, one of the most important water-bearing formations in Northeastern Pennsylvania. Approximately 1,400 people are served by wells that are within 3 miles of the site and draw on the Mauch Chunk Formation for their water supply. There are about 1,600 people living within a 1-mile radius of the site. The distance from the site to the nearest residence is approximately 1,000 feet.

### Site Responsibility:

Cleanup of this site is the responsibility of Federal and State governments, and parties potentially responsible for site contamination (PRPs).

### NPL Listing History:

This site was proposed to the National Priorities List of the most serious uncontrolled or abandoned hazardous waste sites requiring long-term cleanup action on June 1, 1986. The site was formally added to the list on October 4, 1989, making it eligible for federal cleanup funds.

AR500063

**Remainder of the Site:** The final remedy for the remainder of the site was selected in July 1992. EPA's decision called for recycling the fluff. The fluff consists of polyvinyl chloride and polyethylene (plastic chips) metal, fibrous material, paper, soil and clay. A pre-design study was completed in November of 1994. Treatment tests and a pilot study on fluff separation and recycling were finished in late 1995 and early 1996. Some of the fluff fractions separated during the treatment tests contained PCBs at levels of concern. On June 17, 1997 the PRP signed an agreement with EPA, consenting to carry out a study (Focused Feasibility Study, or FFS) to determine other ways to address the fluff pile. The draft FFS was submitted to EPA in August 1998. The draft FFS evaluated options including onsite excavation, treatment and offsite disposal of the fluff. In late August 1998 the PRP submitted a second document to EPA that outlined a remedy of in-place closure or capping of the main fluff pile at the Site. EPA is currently reviewing and evaluating the FFS and the second document submitted by the PRP. In response to EPA's technical concerns regarding the feasibility of onsite closure, the PRP conducted studies in the Spring of 1999 which showed that onsite closure is technically viable. During this timeframe, several elected officials have expressed opposition to onsite closure. EPA plans to issue a new Record of Decision before the end of this year.

## **Contacts**

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### **Remedial Project Manager**

**Frank Vavra**

**215-814-3221**

**vavra.frank@epa.gov**

### **Community Involvement Coordinator**

**Lisa Brown**

**215-814-5528**

**brown.lisa@epa.gov**

**Detailed public files (Administrative Record) on EPA's involvement and decisions at this site can be examined at the following locations:**

### **Rush Township Municipal Building**

**Route 54**

**Hometown, PA 18252**

### **U.S. EPA Region III**

**Superfund Docket Room**

**1650 Arch Street**

**Philadelphia, PA 19103-2029**

**(215) 814-3157**

**AR500064**

DRAFT

R. D. 2, Hometown  
Tamaqua, Pa. 18252  
October 24th, 1968

Regional Sanitary Engineer  
Pennsylvania Department of Health  
401 Buttonwood Street  
West Reading, Pa, 19602

Sir:

I wish to report the pollution of an unnamed tributary of the Little Schuylkill River at Hometown in Schuylkill County. The stream enters the Little Schuylkill about 0.2 miles below the bridge of the Central Railroad of New Jersey at an elevation of about 1020 feet. This stream is not shown on the Tamaqua and Delano Quadrangle maps of the U.S.G.S.; it drains a small valley bounded by L.R. 53217, the Central Railroad of New Jersey, State Game Lands No. 227 and Tidewood Industrial Park.

The source of the pollution is the open dump of the Eastern Diversified Metals Corp. located just off L.R. 53217 at an elevation of about 1160 feet. (See enclosed slides.) The pollutants are the waste from a copper salvage operation and consist of shredded paper, rubber, plastic, copper and aluminum. (see enclosed samples.)

The Rush Township Supervisors have attempted to stop this open dumping. Their efforts ended with the Eastern Diversified assertion that they are conducting a sanitary landfill operation and would continue to do so. This open dump not only causes stream pollution, but also constitutes a fire hazard. In the spring of 1967 the dump was ignited by burning trash and we had a preview of possible future disaster. The noxious fumes and melting tendency of the burning material made fire suppression difficult. The melting resulted in a burning effect similar to that of an oil fire. (See enclosed slide.) This is especially dangerous because the dump is up slope from the woods of State Game Lands No. 227.

It seems that your agency is the only one that can compel Eastern Diversified to run a sanitary landfill instead of an open dump. It is very discouraging to see a new industry following in the footsteps of our old industry here in the Anthracite Region. We have not yet cleaned up the long-standing mine drainage and municipal sewage pollution of the Little Schuylkill and already additional burdens are being placed on this ravaged stream. Tolerance of this added biological insult can only prolong and complicate the task of stream restoration.

If you should require any further information or assistance in solving this problem, please feel free to contact me.

Very truly yours,

Daniel A. Pinkey

AR500065

# COMMONWEALTH of PENNSYLVANIA



## DEPARTMENT OF HEALTH

THOMAS W. GEORGES, JR., M.D.  
SECRETARY OF HEALTH

401 Buttonwood Street  
West Reading, Pennsylvania 19602  
October 29, 1968

Industrial Wastes  
Rush Township  
Schuylkill County  
Eastern Diversified Metals

H. S. Region II  
West Reading Office

Mr. Daniel A. Pinkey  
R. D. #2, Hometown  
Tamaqua, Pennsylvania 18252

Dear Mr. Pinkey:

Acknowledgment is made of receipt of your letter of October 24, 1968, concerning pollution of a tributary to the Little Schuylkill River and also the operation of a dump by the Eastern Diversified Metals Plant located in Hometown. Your letter also transmitted a sample of the waste product from this plant as well as five 2" x 2" color slides.

This office had been aware of the location of this plant at Hometown and inspections had been made over a year ago at which time there was no evidence of stream pollution from their operation. However, since they were piling the waste material which was removed from the wire on their property and this practice could be a source of possible stream pollution in the future from seepage or runoff from the stock pile, a letter had been sent to the Company requesting that they provide some other means of disposal for this material. Since receipt of this new letter of complaint we will conduct a reinspection at the plant for the purpose of determining whether or not stream pollution exists and whether the operation of the dump is satisfactory. Upon completion of our investigation, we will give you a further report on the results of our investigation.

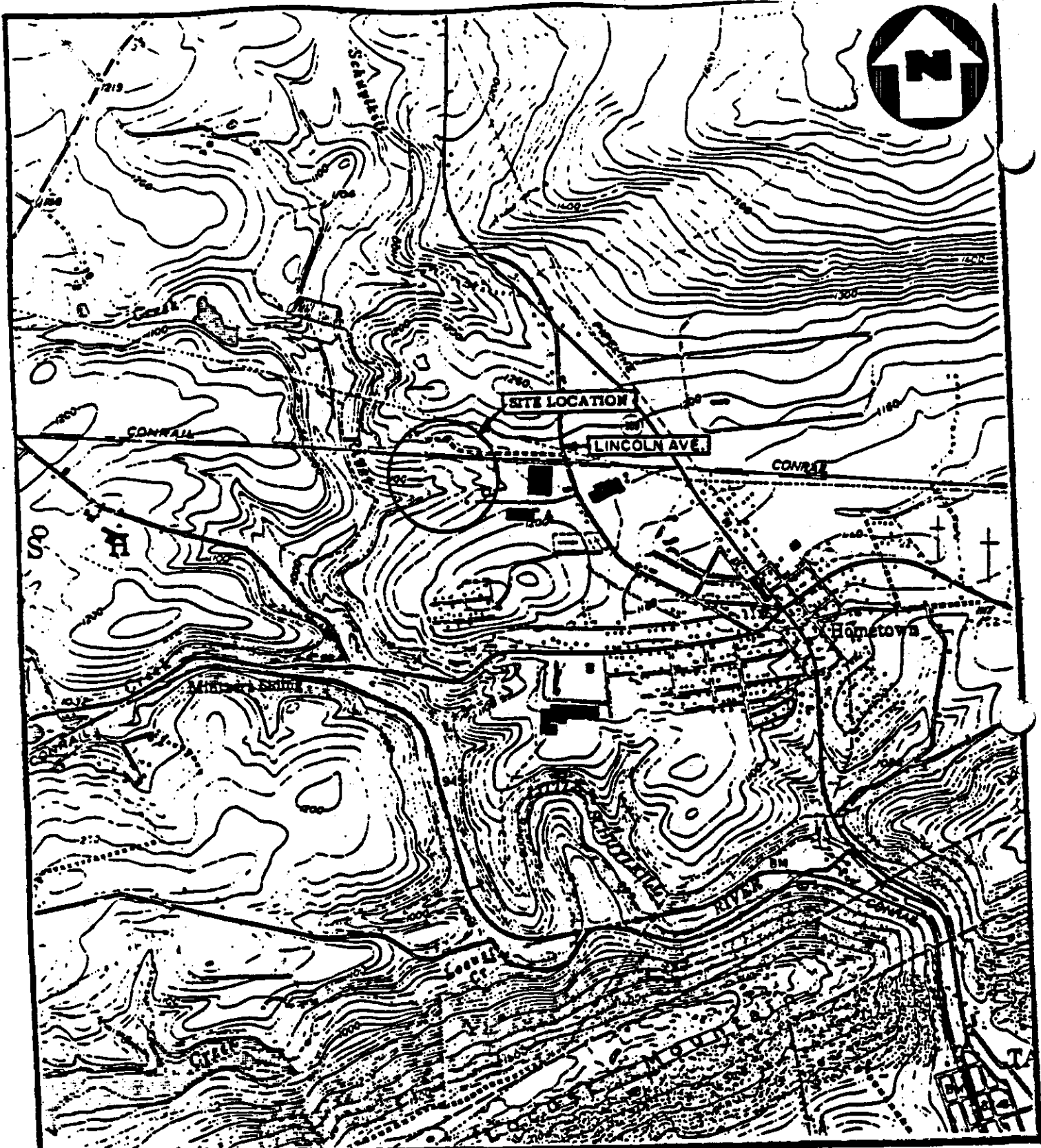
Very truly yours,

Charles H. Kuder  
Assistant Regional Sanitary Engineer  
Operations

CHF:rd

AR500066





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

**EASTERN DIVERSIFIED METALS**  
**Site Location Map**  
 (no scale)

Figure # 1

**NUS**  
 CORPORATION

**H** A Halliburton Company

AR500067

44

# **EASTERN DIVERSIFIED METALS**

**PENNSYLVANIA**

EPA ID# PAD980830533

**EPA REGION 3**

Schuylkill County  
Rush Township

**6th Congressional District**

Last Updated: May 1999

## **Current Site Status**

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Work to control and contain leachate as well as stormwater runoff is already finished. The site treatment plant (for leachate and stormwater) has been upgraded and expanded. A biological treatment system was added to this plant. A new stormwater treatment system has been built. Contaminated debris was removed.

Work to remove hot spots of contamination from the waste pile is nearing completion. Remaining work involves deciding how to address the main waste pile and removing the sediments at the Site.

## **Site Description**

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The 25-acre Eastern Diversified Metals site is a former wire recycling facility. From 1966 to 1977, the company disposed of approximately 350 million pounds of "fluff" (waste insulation material) in an open pile. This fluff comes from stripping the coverings off of copper wire. The fluff disposal pile is approximately 40 feet high, 250 feet wide, and 1,500 feet long. In 1974, the company installed a wastewater treatment plant, diversion ditches, retention basins, and an interceptor trench that diverts shallow groundwater to the treatment plant. The surface impoundments associated with the wastewater treatment plant had overflowed at times into a tributary to the Little Schuylkill River. Three miles downstream of the site, the Little Schuylkill River is used for trout fishing and other recreational activities. The site is underlain by the Mauch Chunk Formation, one of the most important water-bearing formations in Northeastern Pennsylvania. Approximately 1,400 people are served by wells that are within 3 miles of the site and draw on the Mauch Chunk Formation for their water supply. There are about 1,600 people living within a 1-mile radius of the site. The distance from the site to the nearest residence is approximately 1,000 feet.

### **Site Responsibility:**

Cleanup of this site is the responsibility of Federal and State governments, and parties potentially responsible for site contamination (PRPs).

### **NPL Listing History:**

This site was proposed to the National Priorities List of the most serious uncontrolled or abandoned hazardous waste sites requiring long-term cleanup action on June 1, 1986. The site was formally added to the list on October 4, 1989, making it eligible for federal cleanup funds.

AR500068

**Remainder of the Site:** The final remedy for the remainder of the site was selected in July 1992. EPA's decision called for recycling the fluff. The fluff consists of polyvinyl chloride and polyethylene (plastic chips) metal, fibrous material, paper, soil and clay. A pre-design study was completed in November of 1994. Treatment tests and a pilot study on fluff separation and recycling were finished in late 1995 and early 1996. Some of the fluff fractions separated during the treatment tests contained PCBs at levels of concern. On June 17, 1997 the PRP signed an agreement with EPA, consenting to carry out a study (Focused Feasibility Study, or FFS) to determine other ways to address the fluff pile. The draft FFS was submitted to EPA in August 1998. The draft FFS evaluated options including onsite excavation, treatment and offsite disposal of the fluff. In late August 1998 the PRP submitted a second document to EPA that outlined a remedy of in-place closure or capping of the main fluff pile at the Site. EPA is currently reviewing and evaluating the FFS and the second document submitted by the PRP. In response to EPA's technical concerns regarding the feasibility of onsite closure, the PRP conducted studies in the Spring of 1999 which showed that onsite closure is technically viable. During this timeframe, several elected officials have expressed opposition to onsite closure. EPA plans to issue a new Record of Decision before the end of this year.

## **Contacts**

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### **Remedial Project Manager**

Frank Vavra  
215-814-3221  
vavra.frank@epa.gov

### **Community Involvement Coordinator**

Lisa Brown  
215-814-5528  
brown.lisa@epa.gov

Detailed public files (Administrative Record) on EPA's involvement and decisions at this site can be examined at the following locations:

Rush Township Municipal Building  
Route 54  
Hometown, PA 18252

U.S. EPA Region III  
Superfund Docket Room  
1650 Arch Street  
Philadelphia, PA 19103-2029  
(215) 814-3157

AR500069

DRAFT

R. D. 2, Homestown  
Tamaqua, Pa. 18252  
October 24th, 1968

Regional Sanitary Engineer  
Pennsylvania Department of Health  
401 Buttonwood Street  
West Reading, Pa, 19602

Sir:

I wish to report the pollution of an unnamed tributary of the Little Schuylkill River at Homestown in Schuylkill County. The stream enters the Little Schuylkill about 0.2 miles below the bridge of the Central Railroad of New Jersey at an elevation of about 1020 feet. This stream is not shown on the Tamaqua and Delano Quadrangle maps of the U.S.G.S.; it drains a small valley bounded by L.R. 53217, the Central Railroad of New Jersey, State Game Lands No. 227 and Tidewood Industrial Park.

The source of the pollution is the open dump of the Eastern Diversified Metals Corp. located just off L.R. 53217 at an elevation of about 1160 feet. (See enclosed slides.) The pollutants are the waste from a copper salvage operation and consist of shredded paper, rubber, plastic, copper and aluminum. (see enclosed samples.)

The Rush Township Supervisors have attempted to stop this open dumping. Their efforts ended with the Eastern Diversified assertion that they are conducting a sanitary landfill operation and would continue to do so. This open dump not only causes stream pollution, but also constitutes a fire hazard. In the spring of 1967 the dump was ignited by burning trash and we had a preview of possible future disaster. The noxious fumes and melting tendency of the burning material made fire suppression difficult. The melting resulted in a burning effect similar to that of an oil fire. (See enclosed slide.) This is especially dangerous because the dump is up slope from the woods of State Game Lands No. 227.

It seems that your agency is the only one that can compel Eastern Diversified to run a sanitary landfill instead of an open dump. It is very discouraging to see a new industry following in the footsteps of our old industry here in the Anthracite Region. We have not yet cleaned up the long-standing mine drainage and municipal sewage pollution of the Little Schuylkill and already additional burdens are being placed on this ravaged stream. Tolerance of this added biological insult can only prolong and complicate the task of stream restoration.

If you should require any further information or assistance in solving this problem, please feel free to contact me.

Very truly yours,

Daniel A. Pinkey

AR500070

# COMMONWEALTH OF PENNSYLVANIA



## DEPARTMENT OF HEALTH

THOMAS W. GEORGES, JR., M.D.  
SECRETARY OF HEALTH

401 Buttermilk Street  
West Reading, Pennsylvania 19602  
October 29, 1968

Industrial Wastes  
Rush Township  
Schuylkill County  
Eastern Diversified Metals

R. S. Region II  
West Reading Office

Mr. Daniel A. Pinkey  
R. D. #2, Hometown  
Tamaqua, Pennsylvania 18252

Dear Mr. Pinkey:

Acknowledgment is made of receipt of your letter of October 24, 1968, concerning pollution of a tributary to the Little Schuylkill River and also the operation of a dump by the Eastern Diversified Metals Plant located in Hometown. Your letter also transmitted a sample of the waste product from this plant as well as five 2" x 2" color slides.

This office had been aware of the location of this plant at Hometown and inspections had been made over a year ago at which time there was no evidence of stream pollution from their operation. However, since they were piling the waste material which was removed from the wire on their property and this practice could be a source of possible stream pollution in the future from seepage or runoff from the stock pile, a letter had been sent to the Company requesting that they provide some other means of disposal for this material. Since receipt of this new letter of complaint we will conduct a reinspection at the plant for the purpose of determining whether or not stream pollution exists and whether the operation of the dump is satisfactory. Upon completion of our investigation, we will give you a further report on the results of our investigation.

Very truly yours,

Charles H. Kuder  
Assistant Regional Sanitary Engineer  
Operations

CHF:rd

AR500071

## COMMONWEALTH of PENNSYLVANIA



## DEPARTMENT OF HEALTH

THOMAS W. GEORGES, JR., M.D.  
SECRETARY OF HEALTH

Industrial Wastes  
Rush Township  
Schuylkill County  
Eastern Diversified Metals

401 Buttonwood Street  
West Reading, Pennsylvania 19602  
November 22, 1968

H. S. Region II  
West Reading Office

Mr. Daniel A. Pinkey  
R. D. #2, Hometown  
Tamaqua, Pennsylvania 18252

Dear Mr. Pinkey:

This letter is a follow-up to my letter of October 29, 1968, to you concerning your complaint letter of pollution on a tributary to the Little Schuylkill River from the operation of a dump by the Eastern Diversified Metals plant located in Hometown.

A reinspection of this plant and the waste pile was made on November 6, 1968. At the time of this inspection, it was found that this Company has no liquid waste water originating from its plant to be disposed of which would create stream pollution. The Company operates a dry process for the removal of the insulation from the used copper wire. This fluff material which is removed is disposed on the Company property on a long pile. The Company is attempting to place a cover over this material to prevent it from blowing around since most of this material is a light fluff material.

Our inspection around the disposal pile revealed that there is no seepage of water through the pile which would carry contaminants to the Little Schuylkill River. Our one inspection was the day following a heavy rainfall and no gullies or washouts were observed, however, there were several small puddles of water below the pile.

At the present time, the Pennsylvania Department of Health has no control over the operation of existing landfills or refuse piles so long as they do not directly pollute waters of the Commonwealth. The Company is again being cautioned by this office to cover this material to prevent rainfall from entering the pile

AR500072

Mr. Daniel A. Pinkey


- 2 -

November 22, 1968

and also to prevent winds from blowing the fluffy material. The Company is also being cautioned to take all possible steps to prevent the possibility of any runoff of water from the pile or the surrounding area which might contaminate any stream.

I am returning the five colored slides which you had forwarded along with your letter of October 24, 1968. You did not specifically request for their return, however, I assume that these are the only copies which you have. If you should in the future see any evidence or have any proof there is direct pollution to waters of the Commonwealth from this operation, then it would be appreciated if you would immediately recontact this office. We will, however, continue to make reinspections at this plant as time and conditions warrant.

Very truly yours,



Charles H. Kuder  
Assistant Regional Sanitary Engineer  
Operations

CHK:rd

Enclosures

AR500073

(copy)

R.D.2  
Tamaqua, Pa. 18252  
December 5th, 1970

Mr. Charles H. Kuder  
Assistant Regional Sanitary Engineer  
Pennsylvania Department of Health  
Reading, Pennsylvania 19602

Dear Mr. Kuder:

I am writing to you in regard to continued pollution of the Little Schuylkill River through an unnamed tributary that crosses the property of the Diversified Metals Corporation at Homstown, Rush Township, Schuylkill County.

Shredded insulation, a waste from the copper wire salvage operation, is washing into the stream as a result of improper dumping. The material is very evident as one follows the stream from the eastern boundary of State Game Lands #227 to the Little Schuylkill River. One can see bits of insulation in the stream bed, along the stream and floating on the surface of the water. Another small stream is conducted across and beneath the dump through an unsupported ditch covered with the ends of cable spools, about four inches of untreated wood; this is not an adequate, long-term, pollution-free method.

In addition to the sedimentation, there is the possibility of chemical pollution by constituents of electrical insulation, polychlorinated biphenyls. Dr. Carl G. Gustafson has discussed these compounds and their hazards at some length in the October issue of "Environmental Science and Technology". The high persistence and chronic toxicity of the polychlorinated biphenyls which are similar to that of DDT are a serious problem. The possibility that this dump may be a source of these compounds warrants further investigation.

Diversified should be stopped from allowing their wastes from entering the river in any quantity. A recent contract let by the Department of Mines and Mineral Industries (to Martin Associates of King of Prussia) for a survey to determine the location and extent of pollution caused by mine drainage in the Upper Little Schuylkill River is a giant step in the restoration of this long-blighted stream. We should not permit new industries to operate in the same manner as the Anthracite Industry. There must be continuing concern for the environment and realization and assignment of the true costs involved in preserving or restoring it.

Very truly yours,

Daniel A. Finkey

Enclosure: Sketch

PCB Article Delwood personally  
Dec 4th 1970

AR500074

9



Pipe line  
Lampson Water Authority

UNESCHUNKUL RIVER

CRANK

STATE GAME LANDS  
# 227

SUSSEX TOWNSHIP  
DRAINAGE AREA

Diversified Metals  
Plant and Dump  
Hometown, Schuylkill County, Pa.  
(Not to scale)

Dump  
Dump Fall

MAN SHEDS,  
WOOD-COVERED  
DRAINAGE  
DITCH

Plant

PRIVATE ROAD

Intersection Rts 304 & 54

LR 53217

AR500075

R.D. 2, Hometown  
Tamaqua, Pa. 18262  
October 14th, 1970

Schuylkill County Commissioners  
Pottsville, Pa.

Gentlemen:

If you have not yet inspected the dumps at the Speedspace and Diversified Metals plants at Hometown, please do so.

Speedspace piles up their wastes and periodically burns them. This is not a suitable means of solid waste disposal.

Diversified has their wastes piled up in such a way that particles of shredded plastic are going into the Little Schuylkill via a small unnamed tributary. Pallets, steel drums, cable spools and shredded plastics are piled together ~~in a~~ <sup>way</sup> ~~in a manner~~ that makes it difficult to fight the fires that break out periodically. If your inspector looks at the manner in which water is conducted across and beneath the dump he will see an unsupported trench covered with the ends of old cable spools - about four inches of untreated wood; this is not a permanent solution. The dump is advancing toward State Game lands #227; prospects of a fire reaching this point are frightening.

AR500076

It appears that Diversified does not find it necessary to conduct a proper landfill. If they are not compelled to clean up they will eventually present us with problems similar to those following in the wake of our declining Anthracite industry.

Massive pollution and destruction of our landscape were justified on the grounds that they were part of the price of creating jobs. The ~~jobs~~ Anthracite Industry has collapsed, the jobs have disappeared and we are left with a massive cleanup job. The corporations which did the damage have vanished and the public treasury must supply the funds for restoration.

Please use your <sup>authority</sup> ~~power~~ to prevent the new industries from wrecking our <sup>land</sup> ~~country~~ the way the old one did.

Yours for a cleaner, safer, <sup>schuylkill</sup> county.

Daniel A. Penhoy

ELMER JOHNSON, CHAIRMAN  
LEONARD THOMAS  
JOSEPH HOLDEN



WILLIAM D. HUTCHINSON, SOLICITOR  
JOHN A. KSALES, CHIEF CLERK

**COMMISSIONERS OF SCHUYLKILL COUNTY**  
**POTTSVILLE, PENNSYLVANIA**

*October 15, 1970*

*Daniel A. Pinkey  
R. D. 2, Hometown  
Tamaqua, Penna. 18252*

*Dear Mr. Pinkey:*

*We have received your letter of October 14, 1970 concerning  
the dumps at the Speedspace and Diversified Metal Plants at Hometown.*

*A copy of your letter has been sent to the Rush Township  
Supervisors, who may be able to help you with this problem.*

*Very truly yours,*

**BOARD OF COUNTY COMMISSIONERS**

**JOHN A. KSALES**  
*Chief Clerk*

*JAK/mr*



AR500078

Riskey (From Sparks Reese)

Hush Township Supervisors: Request that Eastern Diversified Metals Corporation correct their land-fill operations to satisfy complaints by Township Residents.

A meeting was held in the office of Homer Hayes, Plant Manager of Eastern Diversified Metals Corporation on Tuesday, November 26, 1968 with the following in attendance:

Eastern Diversified Metals Corp.--Homer Hayes  
Hush Township--Supervisors Mrs. Henry Blackwell, Sam Kellet,  
Clarence Hartracht  
Solicitor Sparks Reese  
D.E.--Carl Beran, W. M. Gillespie

Mr. Gillespie explained that the meeting was being held in a family discussion group with the purpose being to assure the Hush Township Supervisors that the Diversified people are doing everything possible to prevent air and stream pollution in the disposal of the waste material. Mr. Hayes stated that the disposal operations at the plant were being checked quite frequently by the Commonwealth of Pennsylvania. He said that most of the reports following these inspections are verbal, so one could not find any evidence of the State's approval of their methods.

Mr. Hayes stated that they had, as recently as several weeks ago, made some further enclosures around their refuse truck loading facilities to further prevent air pollution and that the results were most favorable to the State people in charge of air pollution inspection.

With regard to land-fill operations, he assured the group that earth-fill-covering of the spongy refuse was being done frequently enough to prevent objections; either by its washing into the stream or blowing into the atmosphere, and that in his opinion there was no basis for complaints by residents of the Township or by the Commonwealth. Mr. Hayes said with regard to stream pollution that the report in this case was in writing dated November 22, 1968 and while it was not entirely favorable, it certainly did not warrant being classed as a serious problem, since it involved only small deposits of the light refuse material being washed into the stream at times of heavy rainfall.

In order to correct this, Diversified will construct a dry dam between their land-fill and the stream to serve as a settling basin to trap the material which could wash into the stream otherwise. This construction will be done in the very near future.

The discussions were held without friction and assurances were made by all concerned that an amicable solution to any refuse problems will be found.

The group made a brief tour of the plant and the site of the handling of waste material. It was agreed at the conclusion of the tour that the Township Supervisors will be in a position to advise any future complainants that Diversified is in the process of making further corrections and the Supervisors will be in closer touch with Diversified should there be further complaints.

AR500879

BeDarker  
Tamaqua, Pa. 18252  
December 17th, 1970

Delaware River Basin Commission  
25 Scotch Road, P.O. Box 360  
Trenton, New Jersey 08603

Gentlemen:

I am writing to you in regard to pollution of the Little Schuylkill River which may have significance beyond the local damage that it causes.

The pollutants are wastes from a copper salvage operation conducted by the Diversified Metals Corporation at Hometown, Rush Township, Schuylkill County, Pa. Sediments consisting of shredded paper, rubber and plastics are washing from the dump of this company into an unnamed tributary of the Little Schuylkill River about 0.8 miles below the bridge of the Jersey Central Railroad at an elevation of about 1020 feet. This stream is not shown on the Tamaqua and Delano Quadrangle maps of the U.S.G.S.; it drains a small valley bounded by Leggett's Route 58217, the Jersey Central Railroad, State Game lands #227 and Tidewood Industrial Park.

In addition to the sedimentation, there is the possibility of chemical pollution by constituents of electrical insulation, polychlorinated biphenyls. The high persistence and chronic toxicity of these compounds which are similar to DDT warrant further investigation. Would it be in order for your organization to look into this problem or can you suggest some other agency which could do it?

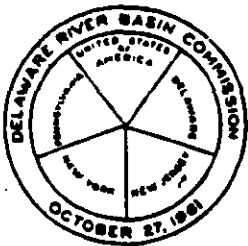
Gradually the cleanup of the Little Schuylkill is proceeding. As you probably know, a mine drainage survey is underway. Sewage plants are being built and upgraded. Possibly, the new problems could overwhelm us before the old ones are taken care of.

Very truly yours,

Daniel A. Pinkey

Enclosures: Sketch  
Article - PCB's

AR500080



JAMES F. WRIGHT  
EXECUTIVE DIRECTOR

DELAWARE RIVER BASIN COMMISSION

~~XXXXXXXXXXXX~~

P. O. BOX 380

TRENTON, NEW JERSEY 08603

(609) 883-8500

December 30, 1970

Mr. Daniel A. Pinkey  
RD #2  
Tamaqua, Pennsylvania 18252

Dear Mr. Pinkey:

Your letter of December 17th reporting the possibility of pollution of an unnamed tributary on the Little Schuylkill River has been forwarded to me for an investigation. This matter has been discussed with Mr. Charles Kudder of the Pennsylvania Department of Health in the West Reading Office. He has requested that his field people make an inspection of the premises and to develop a report of their findings. I have asked Mr. Kudder forward a copy of their report and findings to me. Based on the results of their investigation, the State will take whatever action appears necessary.

I would like to thank you for your writing to us and informing us of the situation. If we can be of additional service to you, please feel free to call on me.

Very truly yours,

*David P. Pollison*

David P. Pollison  
Water Resources Engineer

cc: Mr. Chas Kudder  
Penna. Dept. of Health

Locations:  
25 State Police Drive  
West Trenton, N.J.

AR500081

R.D.2

Tamaqua, Pa. 18252

December 7th, 1970

Pennsylvania Game Commission  
Harvey A. Roberts, Chief - Division of Land Management  
P. O. Box 1587  
South Office Building, State Capitol  
Harrisburg, Pa. 17120

Dear Sir:

I am writing to you about a pollution condition on State Game Lands #227 which you have probably not yet heard about.

The pollutants are wastes from a copper salvage operation operated by the Diversified Metals Corporation at Homelown. They are wastes that wash from the dump of this company into an unnamed tributary of the Little Schuylkill River. The sediments consist of shredded paper, metal and plastics; they are deposited in the stream and along the edges of the stream on Game Commission property. The stream enters the Little Schuylkill about 0.2 miles below the bridge of the Jersey Central Railroad at an elevation of about 1020 feet. This stream is not shown on the Delano and Tamaqua Quadrangle maps of the U.S.G.S.; I think a small one is bounded by Lehighville Route #2217, the Jersey Central Railroad, the Eddie boundary of State Game Lands #227 and the Tidewood Industrial Park.

This dump causes not only water and land pollution but periodically burns. The noxious fumes and melting tendency of the burning materials make fire suppression difficult. The melting results in a burning effect similar to that of an oil fire.

In addition, there is the possibility of chemical pollution caused by constituents of electrical insulation, polychlorinated biphenyls. The high persistence and chronic toxicity of these compounds which are similar to that of DDT warrant further investigation.

With the existing hunting pressure, the importance of tracts like State Game Lands #227 is increasing. We should not allow their game-carrying capacity to be jeopardized by irresponsible industrial waste disposal. Can the Game Commission work toward stopping Diversified Metals from continuing this pollution? Shouldn't Diversified at least be compelled to leave a buffer zone between their dump and the gamelands boundary?

Very truly yours,

Daniel A. Pinkey

Enclosures: Sketch

Article - PCB's

" - "Inquirer"

" - "Times"

AR500082





OFFICE OF  
EXECUTIVE DIRECTOR  
TELEPHONE  
AREA CODE 717 - 787-3632

COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA GAME COMMISSION

P. O. BOX 1567  
HARRISBURG, PA. 17120  
January 7, 1971

ADMINISTRATIVE DIVISIONS:

ACCOUNTING	787-3876
ADMINISTRATION	787-3870
INFORMATION & EDUCATION	787-8286
LAW ENFORCEMENT	787-8748
LAND MANAGEMENT	787-8818
REAL ESTATE	787-8888
MINERALS	787-2182
PROPAGATION	787-8711
RESEARCH	787-8828

Mr. Daniel A. Pinkey  
R.D.#2  
Tamaqua, Pennsylvania 18252

Dear Mr. Pinkey:

The following information is being sent in response to your recent complaint concerning dumping of industrial wastes by the Diversified Metals Corporation on its property at Hometown, Schuylkill County and the washing of this material on our adjoining State Game Lands No. 227.

The Division of Land Management conducted a field investigation on Wednesday, December 23, 1970, to determine the extent of this intrusion.

They were hampered somewhat in their efforts by a recent snow coverage, but were able to find evidence of these deposits, even though heavy rain had flushed the streambed apparently just prior of the snowfall.

However, they were surprised at the extent of Diversified's operation and realized that if allowed to continue unchecked, it will at the least pose a real threat to the Game Lands. In fact it is hard to understand how an operation of this nature was ever permitted on a watershed regardless of size.

AR500083

Mr. Daniel A. Pinkey

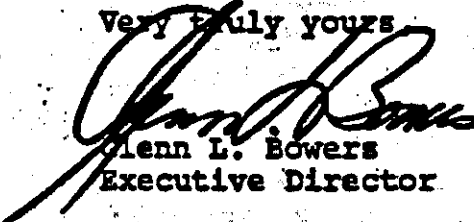
2

January 7, 1971

In view of these circumstances and particularly because of the questionable noxious nature of these materials, we are referring this to the Environmental Control Board through the Department of Health for further investigation and intend to keep abreast of developments.

We appreciate the thorough manner in which you have analyzed this situation and brought it to our attention. We trust you will have been instrumental in remedying one of the many pollution problems existing in our Commonwealth today.

Very truly yours,



Glenn L. Bowers  
Executive Director

AR500084

R.D.2

Tamaqua, Pa. 18252

December 17th, 1970

Pennsylvania Fish Commission  
Robert J. Etelo, Executive Director  
Box 1673  
Harrisburg, Pa. 17120

Dear Sir:

I am writing to you about pollution of an unnamed tributary of the Little Schuylkill River at Homelown, Rush Township, Schuylkill County. The stream enters the Little Schuylkill about 0.3 miles below the bridge of the Jersey Central Railroad at an elevation of about 1020 feet. The stream is not shown on the Tamaqua and Delano Quadrangle maps of the U.S.G.S.; it drains a small valley bounded by Legislative Route 53217 the Jersey Central Railroad, State Game Lands #227 and Tidewood Industrial Park.

The source of the pollution is the open dump of the Diversified Metals Corporation located just off L. R. 53217 at an elevation of about 1160 feet. The pollutants are waste from a copper salvage operation and consist mainly of shredded paper, rubber and plastic which are deposited in the stream and along the course of the stream.

In addition to the sedimentation, there is the possibility of chemical pollution by constituents of electrical insulations, polychlorinated biphenyls. The high persistence and chronic toxicity of these compounds which are similar to that of DDT warrant further investigation.

At this time, the consequences of further polluting the already-dead Little Schuylkill are not too great. However, the Department of Mines and Mineral Industries has recently contracted with Martin Associates to survey the stream in regard to mine drainage pollution. The first of many long steps toward restoration of the Little Schuylkill has been taken. Wouldn't it be shortsighted to solve the problems caused by the old and dying anthracite mining industry and permit the ones caused by the new industries to go unchecked? The recreation potential of a restored Little Schuylkill River is very great. We must not permit it to be sacrificed to irresponsible industrial opportunism.

Very truly yours,

Daniel A. Pinkey

Enclosures: Sketch  
Article - PCB's  
" -- "Inquirer"  
" - "Times"

AR500085



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA FISH COMMISSION  
HARRISBURG 17120

Rec'd  
1/22/71

January 20, 1971

Mr. Daniel A. Pinkey  
R. D. #2  
Tamaqua, Pennsylvania 18252

Dear Mr. Pinkey:

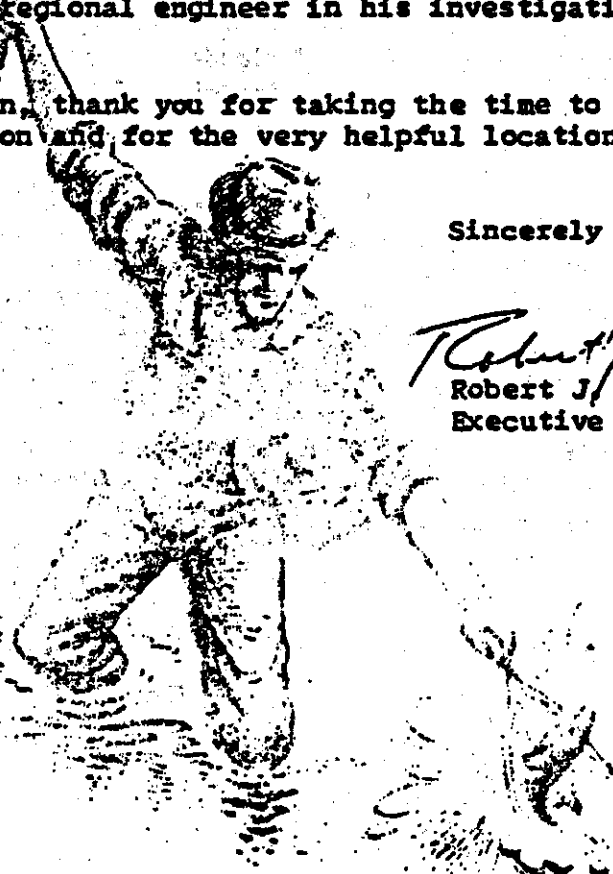
Thank you very much for your letter of December 17, 1970 and the many clippings attached to it, along with the map indicating where the reported pollution can be located. I have forwarded this material directly to Dr. Ellsworth R. Browneller, Secretary of the Department of Health, requesting that he have the matter investigated and that suitable action can be taken to prevent further discharges.

I have also advised we will be pleased to have our field officer, Mr. James Hazen, assist the Department of Health's regional engineer in his investigation of this matter.

Again, thank you for taking the time to send us the information and for the very helpful location map which you provided.

Sincerely yours,

*Robert J. Bielo*  
Robert J. Bielo  
Executive Director



AR500086

R.D.2

Tamaqua, Pa. 18252

December 17th, 1970

Federal Water Quality Administration  
Pollution Control Analysis Branch  
Washington D.D. 20242

Gentlemen:

I am writing to you in regard to pollution of the Little Schuylkill River which may have significance beyond the local damage that it causes.

The pollutants are wastes from a copper salvage operation conducted by the Diversified Metals Corporation at Homelown, Rush Township, Schuylkill County, Pa. (This firm also has plants at St. Louis, Mo. and Cucamonga, Cal.) Sediments consisting of shredded paper, rubber and plastics are washing from the dump of this company into an unnamed tributary of the Little Schuylkill River. The stream enters the Little Schuylkill about 0.5 miles below the bridge of the Jersey Central Railroad at an elevation of about 1020 feet. This stream is not shown on the Tamaqua and Delano Quadrangle's maps of the U.S.G.S.; it drains a small valley bounded by Legislative Route 53217, the Jersey Central Railroad, State Game Lands 5227 and Tidewood Industrial Park.

In addition to the sedimentation, there is the possibility of chemical pollution caused by constituents of electrical insulation, polychlorinated biphenyls. The high persistence and chronic toxicity of these compounds warrant further investigation.

Since these compounds have been identified as sources of environmental problems only recently, wouldn't it be in order for your agency to look at the runoff from this dump and see if it is a source of PCB's? The water quality standards for the Little Schuylkill River call for upgrading it to trout waters; would this be possible with PCB's draining into it? Is the state of technology such that PCB's can be adequately monitored? The tonnage of shredded insulation being dumped at this site is quite large since Diversified Metals serves quite a wide area in the East. Wouldn't it be wise to detect any less-than-obvious pollution problems associated with the operation of this plant as soon as possible?

Very truly yours,

Daniel A. Finkey

Enclosures: Sketch  
Article on PCB's

AR500087

20

RCUD 1/25/71



ENVIRONMENTAL PROTECTION AGENCY  
~~United States Department of the Interior~~  
Water Quality Office  
~~FEDERAL WATER POLLUTION CONTROL ADMINISTRATION~~  
WASHINGTON, D.C. 20242

JAN 21 1971

Mr. Daniel A. Pinkey  
R. D. 2  
Tamaqua, Pennsylvania 18252

Dear Mr. Pinkey:

Your letter dealing with the potential hazardous substance discharge from Diversified Metals Corporation, Hometown, Pennsylvania, has been referred to me. We appreciate the time you took to prepare a descriptive account of the situation.

The State of Pennsylvania has jurisdiction for the unnamed tributary you mentioned in your letter, and therefore I have referred your letter and enclosures to:

Mr. Edward Geismar, Chief (phone: 215-597-4360)  
Philadelphia Field Office  
Environmental Protection Agency  
Water Quality Office  
U. S. Customs House  
2nd and Chestnut Streets, Room 10004  
Philadelphia, Pennsylvania 19106

Mr. Geismar will coordinate with the appropriate State official who should answer your questions regarding water quality standards and pollution detection associated with the operation of the company plant.

Although the PCB pollution danger is recognized by our office, and the current state of technology is such that PCB's can be detected, monitoring devices (pollution surveillance instruments) are, as of now, unavailable, with little likelihood of availability in the very near future. The best detection method of which we are aware were described by Dr. Gustafson.

May I take this opportunity to thank you for your letter and for your concern for the environment. If I can be of further service to you, please contact me.

Sincerely yours,

Dr. C. Hugh Thompson  
Acting Chief

Hazardous Materials Branch  
Division of Oil & Hazardous Materials  
Water Quality Office

(phone: 703-557-7660)

AR500088

R.D.2

Tamaqua, Pa. 18252

December 17th, 1970

Department of Mines and Mineral Industries  
Br. H. B. Charnbury, Secretary  
680 Boas Street  
Harrisburg, Pa. 17102

Dear Sir:

It was good to hear that the restoration of the Little Schuylkill River has begun. Your award of the mine drainage survey contract to Matka Associates is a giant step. However, the mine drainage problem is not the only one that we face along the Little Schuylkill.

Diversified Metals Corporation has a copper wire salvage operation in Hometown, Rush Township here in Schuylkill County. As a result of improper dumping, shredded paper, rubber and plastics are washing into the Little Schuylkill through an unnamed tributary that drains Diversified's property.

In addition to the sedimentation, there is the possibility of chemical pollution by constituents of electrical insulation, polychlorinated biphenyls. The high persistence and chronic toxicity of these compounds which are similar to DDT warrant further investigation.

Does the metal reclamation industry come under the purview of your department? If so, wouldn't it be wise to suppress the pollution from an operation like Diversified Metals while it is still relatively small? Or do we have to wait and let the public treasury absorb the cost of future "Operational Scourge"? Would it be possible for the state to cooperate with Diversified in research which would be directed toward finding a use for the now-discarded waste?

It seems shortsighted to be spending so much to correct the problem caused by our old, unregulated industries while we permit the new industries to wreck the environment at will. Is there any way that we can prevent a second wave of destruction from sweeping over our region?

Very truly yours,

Daniel A. Finkey

Enclosures: Sketch  
Article - PCB's

AR500089

Pinekey (From Sparks Reese)

Rush Township Supervisors: Request that Eastern Diversified Metals Corporation correct their land-fill operations to satisfy complaints by Township Residents.

A meeting was held in the office of Homer Hayes, Plant Manager of Eastern Diversified Metals Corporation on Tuesday, November 26, 1968 with the following in attendance:

Eastern Diversified Metals Corp.--Homer Hayes  
Rush Township--Supervisors Mrs. Harry Blackwell, Sam Kellet,  
Clarence Hartcraft  
~~Solicitor Sparks Reese~~  
D.E.--Carl Baren, W. M. Gillespie

Mr. Gillespie explained that the meeting was being held as a family discussion group with the purpose being to assure the Rush Township Supervisors that the Diversified people are doing everything possible to prevent air and stream pollution in the disposal of their waste material. Mr. Hayes stated that the disposal operations at the plant are being checked quite frequently by the Commonwealth of Pennsylvania. He said that most of the reports following these inspections are verbal, so he could not show us evidence of the State's approval of their methods.

Mr. Hayes stated that they had, as recently as several weeks ago, made some further enclosures around their refuse truck loading facilities to further prevent air pollution and that the results were most favorable to the State people in charge of air pollution inspection.

With regard to land-fill operations, he assured the group that the earth-fill-covering of the spongy refuse was being done frequently enough to prevent objections; either by its washing into the streams or blowing into the atmosphere, and that in his opinion there was no basis for complaints by residents of the Township or by the Commonwealth. Mr. Hayes said with regard to stream pollution that the report in this case was in writing dated November 22, 1968 and while it was not entirely favorable, it certainly did not warrant being classed as a serious problem, since it involved only small deposits of the light refuse material being washed into the stream at times of heavy rainfall.

In order to correct this, Diversified will construct a dry dam between their land-fill and the stream to serve as a settling basin to trap the material which could wash into the stream otherwise. This construction will be done in the very near future.

The discussions were held without friction and assurances were made by all concerned that an amicable solution to any refuse problems will be found.

The group made a brief tour of the plant and the site of the handling of waste material. It was agreed at the conclusion of the tour that the Township Supervisors will be in a position to advise any future complainants that Diversified is in the process of making further corrections and the Supervisors will be in closer touch with Diversified should there be further complaints.

AR500090



BeDarker  
Tamaqua, Pa. 18252  
December 17th, 1970

Delaware River Basin Commission  
25 Scotch Road, P.O. Box 380  
Trenton, New Jersey 08603

Gentlemen:

I am writing to you in regard to pollution of the Little Schuylkill River which may have significance beyond the local damage that it causes.

The pollutants are wastes from a copper salvage operation conducted by the Diversified Metals Corporation at Homelown, Rush Township, Schuylkill County, Pa. Sediments consisting of shredded paper, rubber and plastics are washing from the dump of this company into an unnamed tributary of the Little Schuylkill River about 0.2 miles below the bridge of the Jersey Central Railroad at an elevation of about 1020 feet. This stream is not shown on the Tamaqua and Delane Quadrangle maps of the U.S.G.S.; it drains a small valley bounded by Log's Run Route 53217, the Jersey Central Railroad, State Game lands #227 and Tidewood Industrial Park.

In addition to the sedimentation, there is the possibility of chemical pollution by constituents of electrical insulation, polychlorinated biphenyls. The high persistence and chronic toxicity of these compounds which are similar to DDT warrant further investigation. Would it be in order for your organization to look into this problem or can you suggest some other agency which could do it?

Gradually the cleanup of the Little Schuylkill is proceeding. As you probably know, a mine drainage survey is underway. Sewage plants are being built and upgraded. Possibly, the new problems could overwhelm us before the old ones are taken care of.

Very truly yours,

Daniel A. Pinkey

Enclosures: Sketch  
Article - PCB's

AR500091



JAMES F. WRIGHT  
EXECUTIVE DIRECTOR

DELAWARE RIVER BASIN COMMISSION

~~XXXXXXXXXXXX~~

P. O. BOX 360

TRENTON, NEW JERSEY 08603

(609) 883-9500

December 30, 1970

Mr. Daniel A. Pinkey  
RD #2  
Tamaqua, Pennsylvania 18252

Dear Mr. Pinkey:

Your letter of December 17th reporting the possibility of pollution of an unnamed tributary on the Little Schuylkill River has been forwarded to me for an investigation. This matter has been discussed with Mr. Charles Kudder of the Pennsylvania Department of Health in the West Reading Office. He has requested that his field people make an inspection of the premises and to develop a report of their findings. I have asked Mr. Kudder forward a copy of their report and findings to me. Based on the results of their investigation, the State will take whatever action appears necessary.

I would like to thank you for your writing to us and informing us of the situation. If we can be of additional service to you, please feel free to call on me.

Very truly yours,

*David P. Pollison*

David P. Pollison  
Water Resources Engineer

cc: Mr. Chas Kudder  
Penna. Dept. of Health

Location:  
25 State Police Drive  
West Trenton, N.J.

AR500092

R.D.2  
Tamaqua, Pa. 18252  
December 27th, 1970

Pennsylvania Game Commission  
Harvey A. Roberts, Chief - Division of Land Management  
P. O. Box 1587  
South Office Building, State Capitol  
Harrisburg, Pa. 17120

Dear Sir:

I am writing to you about a pollution condition on State Game Lands #227 which you have probably not yet heard about.

The pollutants are wastes from a copper salvage operation conducted by the Diversified Metals Corporation at Homelown. They are sediments that wash from the dump of this company into an unnamed tributary of the Little Schuylkill River. The sediments consist of shredded paper, rubber and plastics; they are deposited in the stream and along the course of the stream on Game Commission property. The stream enters the Little Schuylkill about 0.2 miles below the bridge of the Jersey Central Railroad at an elevation of about 1020 feet. This stream is not shown on the Delano and Tamaqua Quadrangle maps of the U.S.G.S.; it drains a small valley bounded by Legislative Route 38217, the Jersey Central Railroad, the State boundary of State Game Lands #227 and the Tidewood Industrial Park.

The dump causes not only water and <sup>air</sup> land pollution but periodically burns. The noxious fumes and melting tendency of the burning material make fire suppression difficult. The melting results in a burning effect similar to that of an oil fire.

In addition, there is the possibility of chemical pollution caused by constituents of electrical insulation, polychlorinated biphenyls. The high persistence and chronic toxicity of these compounds which are similar to that of DDT warrant further investigation.

With the deer hunting pressure, the importance of tracts like State Game Lands #227 is increasing. We should not allow their game-carrying capacity to be jeopardized by irresponsible industrial waste disposal. Can the Game Commission work toward stopping Diversified Metals from continuing this pollution? Shouldn't Diversified at least be compelled to leave a buffer zone between their dump and the game lands boundary?

Very truly yours,

Daniel A. Pinkey

Enclosures: Sketch  
Article - PCB's  
" - "Inquirer"  
" - "Times"

AR500093



OFFICE OF SECRETARY

DEPARTMENT OF ENVIRONMENTAL RESOURCES  
COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF MINES AND MINERAL INDUSTRIES

HARRISBURG

February 2, 1971

2/6/71

Mr. Daniel A. Pinkey  
R. D. #2  
Tamaqua, Pennsylvania 18252

Dear Mr. Pinkey:

This will acknowledge receipt of your letter of December 17, 1970. We are aware of the various industrial waste problems along the Schuylkill River. As you suggest in your fourth paragraph, the legislated authority of this Department is limited to pollution abatement from problems originating from abandoned mines.

We are taking the liberty to refer your letter and accompanying attachments to Mr. Wesley Gilbertson of the Pennsylvania Department of Health for his consideration and reply.

Thank you for appraising us of this environmental pollution problem.

Yours truly,

Mrs. M. E. Gutschall  
Executive Deputy Secretary  
Department of Environmental Resources

MBG/des

cc: Mr. Wesley Gilbertson

AR500094

COMMONWEALTH of PENNSYLVANIA



DEPARTMENT OF HEALTH

P. O. BOX 18  
HARRISBURG 17120

DEPARTMENT OF ENVIRONMENTAL RESOURCES  
P. O. Box 2351

February 17, 1971

Mr. Daniel A. Pinkey  
R. D. #2  
Tamaqua, Pennsylvania 18252

Dear Mr. Pinkey:

Mrs. Gutshall has forwarded to us your letter of December 17 in which you report dumping and possible pollution of the Little Schuylkill by Diversified Metals Corporation at Hometown.

We are passing this material on to our West Reading office who will investigate the situation and contact you in regard to your findings.

Very truly yours,

*Donald A. Lazarchik*  
Donald A. Lazarchik, Director  
Division of Industrial Wastes

AR500095

Rev P  
2/19/71

COMMONWEALTH OF PENNSYLVANIA



DEPARTMENT OF ENVIRONMENTAL RESOURCES

HARRISBURG 17130

DEPARTMENT OF ENVIRONMENTAL RESOURCES  
P. O. Box 2351

March 2, 1971

Mr. Daniel A. Pinkey  
R. D. 2  
Tamaqua, Pennsylvania 18252

Dear Mr. Pinkey:

Mr. Robert J. Biele has forwarded your letter of December 17, 1970 to the Department of Environmental Resources for investigation.

Please be advised that we are entirely in accord with your position that the restoration of the Little Schuylkill, for recreation, is an important step in our Environmental improvement program. In this connection, our field personnel from the West Reading regional office, have inspected the stream to which you refer, and have found that the Diversified Metals Corporation is apparently in violation of the Clean Streams Act, inasmuch as there is definite seepage from the dump which contains phenols.

Our regional office is taking the necessary steps to insure that this discharge is not only abated, but also that necessary legal action is initiated in order to prevent any such recurrence.

Very truly yours,

*Donald A. Lazarchik*  
Donald A. Lazarchik, Director  
Division of Industrial Wastes

AR500096

245  
RCVD  
3/5/71

COMMONWEALTH OF PENNSYLVANIA



DEPARTMENT OF ENVIRONMENTAL RESOURCES

Reading Office  
18 Angelica Street  
Reading, Pennsylvania 19602  
April 2, 1974

215  
378-4366  
Call Lytle 78-4358  
at this number

Industrial Waste  
Schuylkill County

Mr. George Pinkey  
R. D. #2 - Box 268  
Tamaqua, Pennsylvania 18252

Dear Mr. Pinkey:

I understand you called Mr. Louis Berchini, Assistant Director for Development and Field Programs in our Harrisburg Office last week. You inquired about the Department's programs regarding possible pollution generated by Eastern Diversified Metals and Agmat Corporation in Schuylkill County. Please be advised that both of these cases have been referred to our Strike Force attorneys for possible legal action as required under the Clean Streams Law.

In view of these referrals to our Strike Force, further comment is not appropriate at this time. You may be sure that further action will be taken by the Department regarding these two cases.

If you have any further questions, feel free to contact this Office at any time.

Very truly yours,

R. S. Lytle, Chief  
Compliance & Administration Section

*Handwritten notes:*  
Olemond  
Call  
John

RJL:rt

AR500097

Rush Township Environmental Advisory Council  
Rush Township Municipal Building  
R. D. #2, Box 486-A  
Tamaqua, Pa. 18252  
February 11, 1981

Mr. Clifford L. Jones  
Commonwealth of Pennsylvania  
Department of Environmental Resources  
Harrisburg, Pa. 17120

Dear Mr. Jones,

Enclosed you will find a copy of the ordinance establishing the Rush Township Environmental Council. The Council members feel that it is absolutely necessary that we meet with officials of the Department of Environmental Resources. We would like to review the myriad of environmental problems that exist in our township including: McAdoo Associates, Diversified Metals, Agmet and Air Products.

If this meeting can be arranged we would like to be brought up to date on what has been done to overcome these and other problems. We feel that a tour of these sites and a discussion of each will enable us to formulate plans so that eventually we will no longer be experiencing pollution from these sites.

If at all possible we would like you personally to attend the proposed meeting. We feel that our Environmental Advisory Council is a pioneer attempt at local government solving local environmental problems. We can assure you that we will cooperate with your department whenever and wherever possible.

If you have any questions or would like to discuss the requested meeting you can call me at 717-668-0179 any day before 2:15 p.m.

Respectfully yours for a better Environment,

George A. Pinkay, Secretary  
Rush Township Environmental Advisory Council

AR500098



Rush Township Environmental Advisory Council  
Rush Township Municipal Building  
R.D. #2 Box 486-A  
Tamaqua, Pa. 18252  
April 24, 1981

Mr. Michael Krempasky  
Division of Planning Assistance  
Bureau of Environmental Planning  
Department of Environmental Resources  
Harrisburg, Pa. 17120

Dear Mr. Krempasky:

On Thursday May 14, 1981 at 9:00 am the Rush Township Advisory Council and members of the regional staff of the Department of Environmental Resources will tour several of the Environmental problems in Rush Township. The tour will begin at the Rush Twp. Municipal Building in Hometown.

The Rush Advisory Council would appreciate if you would go with us on this tour. Also, we anticipate passage of an Environmental Impact Statement ordinance in the near future. We would appreciate your assistance in developing an impact statement form suitable for use in our township.

We are looking forward to seeing you on May 14th.

Respectfully yours,

George A. Pinkey  
Secretary Rush Twp. Environmental  
Advisory Council

AR500099

*For the Envr. Comm. & for the  
Planning Comm. - add a copy to both  
Chairman*

*JES*

**BLANK, ROME, COMISKY & MCCAULEY**

330 MADISON AVENUE  
NEW YORK, NEW YORK 10017  
212-687-7110

2000 PENNSYLVANIA AVE. N.W.  
WASHINGTON, DC 20006  
202-467-7700

55 HADDON AVENUE  
HADDONFIELD, NJ 08033  
609-284-1400

FOUR PENN CENTER PLAZA  
PHILADELPHIA, PENNSYLVANIA 19103  
215-569-5500  
TWX 710-670-1073 - BLARCOM  
TELECOPIER 215-564-8388

4770 BISCAYNE BOULEVARD  
MIAMI, FLORIDA 33137  
305-573-5500  
1685 PALM BEACH LAKES BLVD.  
WEST PALM BEACH, FLORIDA 33401  
305-886-8100

DIRECT DIAL NUMBER:  
215-569-5689

September 10, 1984

Mr. Joseph Svetz  
Township Supervisor  
Rush Township Municipal Building  
RD #2, Box 486A  
Tamaqua, Pennsylvania 18252

Re: Theodore Sall, Inc., Hometown, PA

Dear Mr. Svetz:

I am writing in response to your request during our telephone conversation on September 6, 1984. I am happy to confirm that Theodore Sall, Inc. (Sall) is planning to conduct an environmental assessment of the piles of wire insulation strippings located at Sall's facility in Hometown, PA.

The environmental assessment will be conducted under the supervision of Todd Giddings & Associates, Inc. of State College, Pennsylvania. The scope of the assessment was approved recently by the Pennsylvania Department of Environmental Resources (DER) after negotiations that extended over many months. The assessment will include collection and analysis of more than 50 samples of the piles. It will also include analysis of surface water and ground-water samples and samples of the wastewater treatment plant influent and effluent.

We have tentatively scheduled field work to commence during the week of September 17, 1984 and anticipate that all field work will be completed by the end of October. It will take approximately 4 to 6 weeks to receive a report of all sample analyses from the analytical laboratory. Thereafter, it will take approximately 3 to 6 weeks to complete a report that will be submitted to the DER.

Please let me know if you have any further questions in the future.

Very truly yours,

*Benjamin G. Stonelake Jr.*  
BENJAMIN G. STONELAKE, JR.

BGS/ln

cc: Leo Paradoski  
Kerry Tyson

AR500100

(DRAFT)

Rush Township Board of Supervisors  
Rush Township Municipal Bldg.  
RD. 2, Box 486A  
Tamaqua, Pa. 18252

Re: Environmental Assessment of waste dump at site of Diversified Metals, Inc. (now owned by Theodore Sall, Inc.)

Gentlemen:

We have received and reviewed the letter sent to Mr. Svotz by the law firm of Black, Rouse, Comisky & McCauley on 9/10/84 regarding the above matter.

The Rush Township Planning Commission believes that any environmental assessment of this waste dump must include (in addition to the areas mentioned in the letter) a determination of the amount of asbestos present and of the gases generated when this material burns. Despite a history of fires at this site there has never been a determination of the flammability of this material nor have the combustion products been identified.

AR500101

We believe that the nature of the material demands that it be considered as hazardous and potentially toxic unless it can be proven to be otherwise.

To properly protect the people of our community and those of neighboring communities we recommend that you take the following action:

1. Inform the owner of the pile that he must determine the total danger of the pile.
  2. Inform the Pa DER that you must be informed of the results of the survey by Todd Giddings & Associates to do our site.
  3. Put some sort of deadline on Theodore Sall, Inc regarding cleanup of the dump.
- Prepare to bring in the Federal Environmental Protection Agency if a satisfactory cleanup is not brought about.

cc. Rush Trip EAC

VTY

RTPC

30

PLA  
DER  
MFG  
COD  
023

(99-91) 2807L

AR500102

**BLANK, ROME, COMISKY & MCCAULEY**

FOUR PENN CENTER PLAZA

PHILADELPHIA, PENNSYLVANIA 19103

215-569-5500

TWR 710-678-1072 • BLARCON

TELECOMER 215-564-5308

2000 PENNSYLVANIA AVE. N. W.  
WASHINGTON, DC 20008  
202-467-7700

88 HADDON AVENUE  
HADDONFIELD, NJ 08033  
609-284-1400

4770 BISCAYNE BOULEVARD  
MIAMI, FLORIDA 33137  
305-673-8800

1401 FORUM WAY  
WEST PALM BEACH, FLORIDA 33401  
305-686-8100

DIRECT DIAL NUMBER:

215-569-5689

October 8, 1985

Joseph Svetz, Vice Chairman  
Rush Township Supervisors  
Rush Township Municipal Building  
Box 486A  
RD #2  
Tamaqua, Pennsylvania 18252

Re: Theodore Sall, Inc., Site Evaluation Report  
Rush Township, Schuylkill County, PA

Dear Mr. Svetz:

As a followup to our telephone conversation last week, I am forwarding a copy of an environmental site evaluation report by Todd Giddings & Associates, Inc. regarding the wire stripping pile of Theodore Sall, Inc. in Rush Township, Schuylkill County, PA. Most of this pile consists of plastic coverings from telephone wire that was stripped during the process of recycling copper for the telephone company. As I mentioned in our conversation, the report indicates that, among other things, the leachate collection and treatment system designed and installed at this site in the middle 1970's is effective in collecting leachate from the pile and preventing any contamination of groundwater off of the site. The company continues to operate a wastewater treatment plant to treat the leachate collected by the system and this treatment plant is currently operated in compliance with its existing wastewater discharge permit. After further consultation with the Department of Environmental Resources, Theodore Sall, Inc. intends to design and install certain erosion and sedimentation control measures to assure that none of the wire strippings will migrate from the site during periods of extreme rainfall or snow melt.

For the above reasons, and other reasons stated in the report, the company believes that it is reasonable to maintain the pile in place. Currently, the company has no immediate plans to remove the pile. However, it recognizes that some Township

AR500103

BLANK, ROME, COMISKY & McCAULEY

Joseph Svetz, Vice Chairman

October 9, 1985

Page Two  
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residents would prefer that the pile be removed. We believe this desire is based on esthetic reasons and do not believe that there is any sound environmental reason for taking such drastic measures. However, the company is continuing to explore possible uses for the wire strippings and would be happy to discuss any alternatives or suggestions that you might be able to offer. Unfortunately, it does not appear that Mr. Tonelli's company has any current interest in recycling any of the plastic in the pile.

Sincerely yours,

*Benjamin G. Stonelake, Jr.*

BENJAMIN G. STONELAKE, JR.

BGS/lh

Enclosure

cc: Leo Paradossi  
Kerry Tyson

AR500104

15TH DISTRICT  
JAMES J. RHOADES

PLEASE REPLY TO:

- SENATE POST OFFICE  
THE STATE CAPITOL  
HARRISBURG, PA. 17120
- ROOM 208, CITY HALL  
POTTSVILLE, PA. 17801
- 130 E. CENTRE STREET  
MAHANOG CITY, PA. 17948



Senate of Pennsylvania

COMMITTEES

GAME & FISHERIES, CHAIRMAN  
EDUCATION, VICE CHAIRMAN  
AGING AND YOUTH  
AGRICULTURE AND RURAL AFFAIRS  
APPROPRIATIONS  
ENVIRONMENTAL RESOURCES & ENERGY

JOINT LEGISLATIVE AIR AND WATER  
POLLUTION CONTROL AND CONSERVATION  
COMMITTEE  
LEGISLATIVE DATA PROCESSING  
COMMITTEE  
MILITARY COUNCIL  
PNEAA BOARD OF DIRECTORS

December 4, 1984

Mr. Daniel Pinkey  
R.D. #2, Box 139  
Tamaqua, PA 18252

Dear Daniel:

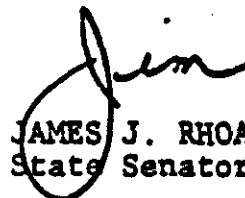
Thank you for contacting me regarding a waste pile in Hometown.

Daniel, I have forwarded the sample to a testing agency and await their response. As soon as I receive any information, I will forward it to you. Please be assured of my genuine concern in this critical matter.

In the meantime, if you hear anything or desire further action, please feel free to contact me. The services of my office are always available to you.

With warm regards,

Sincerely,

  
JAMES J. RHOADES  
State Senator

JJR:pae

AR500105



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL RESOURCES

Bureau of Solid Waste Management  
Wilkes Barre Regional Office  
90 East Union Street - 2nd Floor  
Wilkes Barre, Pennsylvania 18701 (717)826-2516



December 21, 1984

DEC 26 1984

The Honorable James J. Rhoades  
Room 205, City Hall  
Pottsville, PA 17901

Dear Senator Rhoades:

RE: Letter of December 4, 1984  
Inquiry About Theodore Sall Inc.  
Eastern Diversified Metals  
Rush Township, Schuylkill County

The sample of waste materials submitted to you and received by the Department on December 7, 1984 is from Theodore Sall Inc., also known as Eastern Diversified Metals, Rush Township, Schuylkill County. The Bureaus of Water Quality Management and Solid Waste Management have been actively working on this case since 1983. Several issues have been discussed between Theodore Sall Inc., Bureau of Water Quality Management, and the Bureau of Solid Waste Management and DER attorneys in Harrisburg, these include: violations for discharges above NPDES limits, and improper surface water management; Bureau of Solid Waste Management violations of the illegal existence of the waste pile, and the need for its proper sampling to determine its classification and regulatory status as either a residual or hazardous waste. Discussions have also included the problems of leachate seeps and groundwater monitoring. The Department has sent Notice of Violations, one dated May 27, 1983 from Paul Koval, Bureau of Water Quality Management, stating violations for discharge standards and improper surface water management, and a Notice of Violation dated March 23, 1983 from William R. Adams, Solid Waste Operations Supervisor, for illegal disposal of solid waste (the waste pile). Our legal staff has been constantly aware of the problems and has been supplying advise on Department actions and correspondence.

The Bureau of Solid Waste Management is currently pursuing a determination of the proper classification of the waste pile through a sampling and analysis plan request and this will provide the data necessary for the later development of a proper closure plan. In January 1984, a letter to Theodore Sall from Mr. Theodore Geary, Chemist, Bureau of Solid Waste Management, set forth the general requirements for a sampling and analysis plan. Theodore Sall responded by hiring Todd Giddings and Associates, Consulting Hydrogeologists, to prepare the sampling plan. On July 26, 1984, a review of the sampling plan submitted by Theodore Sall was completed and major deficiencies were noted. The plan was then amended, and drilling in the waste pile for samples began but was discontinued after difficulties and was eventually postponed due to winter weather

AR500106



The Honorable James J. Rhoades

-2-

December 21, 1984

conditions. This sampling must be conducted so the waste can be properly classified and a closure plan prepared. The Department is awaiting the completion of this sampling plan implementation and the next phase of closure planning.

In addition, EPA has been involved. The site was investigated in the preliminary assessment stage of the CERCLA (Superfund) Program on January 30, 1984. The preliminary assessment was performed by NUS, the responsible EPA consultant. A report is presently being prepared by NUS which should present an opinion on the need for further action under Superfund based on potential hazards and environmental impact.

If you have any questions, feel free to contact my office at (717) 826-2516.

Sincerely,

  
David J. Lemereaux  
Regional Solid Waste Manager

DJL:RMM:amw

cc: R. Allen (12'7'84 log)  
J. Chester  
M. Carmon  
File  
Chron.

AR500107

33



Senate of Pennsylvania

January 31, 1985

cc: Mr. Daniel Pinkey

Nicholas DeBenedictis, Secretary  
Commonwealth of Pennsylvania  
Department of Environmental Resources  
9th Floor Fulton Building  
Third and Locust Streets.  
P. O. Box 2063  
Harrisburg, PA 17120

Dear Secretary DeBenedictis:

Please find enclosed a copy of the response I received from Mr. David J. Lamereaux, Regional Solid Waste Manager, regarding the sample of material I asked to be examined.

I am very pleased to learn that the Department of Environmental Resources has been aware of this situation and has taken the necessary steps to determine the extent of contamination. However, I must respectfully request your intervention into this matter.

In my first letter to you I asked for a list of the sample's components and their environmental and health impact. Mr. Lamereaux's response did not include this.

I truly appreciate your concern in this matter and I applaud the Department's efforts.

If you have any further questions, please feel free to contact me.

Thank you very much for your time and effort.

With warm regards,

Sincerely,

JAMES J. RHOADES  
State Senator

Enc.

AR500109

36

28TH DISTRICT  
JAMES J. RHOADES

PLEASE REPLY TO:

- SENATE POST OFFICE  
THE STATE CAPITOL  
HARRISBURG, PA 17120
- 123 MAHANTONGO STREET  
POTTSVILLE, PA 17901
- 32 E. CENTER STREET  
MAHANAY CITY, PA 17948



Senate of Pennsylvania

COMMITTEES

GAME AND FISHERIES, CHAIRMAN  
EDUCATION, VICE CHAIRMAN  
AGING AND YOUTH  
AGRICULTURE AND RURAL AFFAIRS  
APPROPRIATIONS  
ENVIRONMENTAL RESOURCES AND ENERGY

JOINT LEGISLATIVE AIR AND WATER  
POLLUTION CONTROL AND CONSERVATION  
COMMITTEE  
MILRITE COUNCIL  
PNEAA BOARD OF DIRECTORS  
LOCAL GOVERNMENT COMMISSION

March 21, 1985

Mr. George Pinkey  
R.D. 2  
Hometown  
Tamaqua, PA 18252

Dear George:

Please find enclosed a copy of the letter I received from Mr. James W. Chester, Regional Environmental Protection Director, Department of Environmental Resources, regarding the sample material which was taken from the Theodore Sall, Inc./Eastern Diversified Metals waste pile.

Upon your reviewal of this letter, if you have any questions, please feel free to contact me.

Once again, thank you for bringing this matter to my attention.

With warm regards,

Sincerely,

A handwritten signature in cursive script that reads "Jim Rhoades".

JAMES J. RHOADES  
State Senator

JJR/lak

Enclosure

AR500110



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL RESOURCES

Office of Environmental Protection  
90 East Union Street - 2nd Floor  
Wilkes-Barre, Pennsylvania 18701-3296  
(717) 826-2511



March 4, 1985

MAR 5 1985

The Honorable James J. Rhoades  
Senate Of Pennsylvania  
123 Mahantongo Street  
Pottsville, PA 17901

Dear Senator Rhoades:

I have been asked to reply to your letter to Secretary DeBenedictis, dated January 31, 1985 in which you ask further clarification and detail to your initial inquiry of December 4, 1984.

I have read Dave Lamereaux's reply to your December 4 letter and I believe it to be comprehensive and to the point. However, I can understand your question on exact chemical constituents of the material in your sample. Because we are aware of the source of the material in your sample, we believe that an analysis of the sample would produce no more confirmation than we have available to us now and therefore we did not perform an analysis on the sample. Please consider the following as a description of the contents of your sample.

The Theodore Sall, Inc./Eastern Diversified Metals process was simply a wire reclamation procedure which retrieved the metal component of waste utility (coated) wire. Both operators at the plant used a physical, non-chemical process to separate the metal core of the wire and stored the finely chopped plastic wire coating as a waste product on their property. This is the material in your sample.

As far as the chemical constituents of the material you submitted, consider the materials present in coated wire: a metal element (usually copper) a binder to adhere the insulating coating to one wire and the insulation itself. To reflect and monitor the environmental impact of the chemical constituents of the waste material, the Bureau of Water Quality Management has designated parameters to be monitored according to the facility's National Pollution Discharge Elimination System permit. This permit requires treatment of leachate collected from the waste pile and directs the present owner to analyze, on a weekly basis, the following:

- 1) 5-Day Biochemical Oxygen Demand - This is a measure of the demand for oxygen which this treated wastewater will exert when it enters a receiving stream;
- 2) Total Suspended Solids - A measure of the solids content of the permittee discharge;

AR500111

March 4, 1985

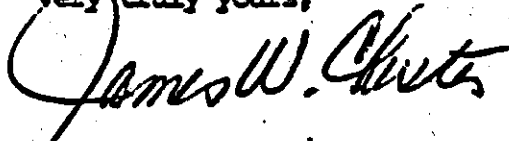
- 3) Ammonia Nitrogen - This is an organic form of nitrogen which derives from another form of nitrogen (urea) which is a component of the binder which I described before; urea is also added to the wastewater treatment plant to maintain a nutrient balance in its scheme;
- 4) Copper - This metal is the constituent of the core of the wire under processing;
- 5) Zinc - This metal is monitored only because it can significantly increase the effects of copper in the treated discharge and the receiving stream, the Little Schuylkill River.
- 6) Phenols - This is a class of organic compounds which are also a component of the binder used in the wire under reclamation.

These, then are the main chemical constituents which can be produced by the waste pile. You should also know that a complete chemical analysis of the groundwater in the area and of the leachate generated by the pile will be taken by the present owner, and have already been taken by representatives of the U. S. Environmental Protection Agency in the Spring of 1984.

This case, like many others, addresses the presence and use of several compounds and chemicals which may or may not pose any environmental problems, depending on quantities present and the existence of route for exposure to the materials. This critical question will be answered upon completion of the next phase of the Superfund process.

I hope that this information has been of some help in answering your concern.

Very truly yours,



JAMES W. CHESTER  
Regional Environmental  
Protection Director

JWC:DJL:WFM:mab

cc: R. Allen (2'4'85 Log)  
L. Ruchinski  
D. Lamereaux  
W. McDonnell  
M. Cannon  
File  
Chron.

AR500112

TechLaw, Inc.

12030 Sunrise Valley Drive  
Suite 200  
Reston, Virginia 22091  
703/476-1100

March 13, 1986

Mr. Dan Pinkey  
R.D. #2, Box 139  
Tamaqua, Pennsylvania 18252

Re: Eastern Diversified Metals Corporation Site

Dear Dan:

We enjoyed meeting with you on February 26. Hopefully progress will be made on the site as EPA becomes more actively involved. To the extent that I can, I will let you know what transpires. I urge you to consider ways of identifying additional suppliers or haulers of wire to the recycling plant.

I have enclosed the report and the jar of material which you provided to us. By the way, we made the plane with two minutes to spare. The walk along the train tracks and view from the trestle were well worth the time spent. Again, thanks for your help.

Very truly yours,



Matthew A. Low

MAL/gpb  
Enclosures

AR500113



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III

841 Chestnut Building  
Philadelphia, Pennsylvania 19107

APR 2 1989

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

In Reply Refer To: 3HW12

Daniel Pinkey  
RD2, Box 139  
Tamaqua, PA 18252

Re: Eastern Diversified Metals Site  
Hometown, Schuylkill County, PA

Dear Mr. Pinkey:

The Environmental Protection Agency (EPA) is seeking information concerning a release, or the threat of a release, of hazardous substances into the environment. Pursuant to the authority of Section 3007(a) of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. §6927(a), and Section 104(a) of CERCLA, 42 U.S.C. §9604(a), you are requested to furnish all information and documents in your possession, which concern, refer, or relate to, but not limited to, hazardous wastes and/or substances as defined by Section 101(14) of CERCLA, 42 U.S.C. § 9601(14), and any type of substances or materials which were transported to, stored, or disposed of at the Eastern Diversified Metals Site located approximately 1000 (one-thousand) feet off the Lincoln Avenue in Hometown, Schuylkill County, Pennsylvania.

The response should include, but not be limited to, information and documentation concerning:

1. The types and quantities of the substances sent to the Eastern Diversified Metals Site;
2. The date(s) such substances were sent to the Eastern Diversified Metals Site;
3. The state (i.e., liquid, solid, or gaseous) of the substances sent to the Eastern Diversified Metals Site, and the manner in which the substances were treated, stored or disposed (i.e., drummed or uncontained, placed in lagoons, landfilled, placed in piles, etc.);
4. Any correspondence between you and any regulatory agencies regarding such substances;

AR500114

5. Any correspondence between you and any third party regarding such substances;
6. The identity of, and documents relating to, any other person or company which generated, stored, treated, transported, disposed, or who arranged for the storage, treatment, disposal, or transportation of such substances to the Eastern Diversified Metals Site;
7. Copies of any deeds, rights-of-way, leases, or other real estate or property interests you have in the Eastern Diversified Metals Site;
8. A description of any dealings you may have had with Theodore Sall, Inc. and copies of any type of documents in relation to such dealings;
9. A description of any and all dealings you may have had with the Eastern Diversified Metals Corp. and/or Diversified Industries, Inc., including but not limited to any and all documents which relate to such dealings.

Please describe any documents that were maintained by you of the transactions with the Eastern Diversified Metals Site including the dates of the documents, the author of the documents, the current location of the documents and the current custodian, and all efforts that were taken to identify these documents.

All information and documents requested are due to the address listed below within ten (10) calendar days of receipt of this letter. Send all the information to:

Francisco Barba, Compliance Officer  
CERCLA Remedial Enforcement Section (3HW12)  
U.S. EPA, Region III  
841 Chestnut Building  
Philadelphia, PA 19107

As used herein, the term "documents" means writings (handwritten, typed or otherwise produced or reproduced) and includes, but is not limited to, any invoices, checks, receipts, bills of lading, weight receipts, toll receipts, correspondence, offers, contracts, agreements, deeds, leases, manifests, licenses, permits, bids, proposals, policies of insurance, logs, books of original entry, minutes of meetings, memoranda, notes, calendar or diary entries, agendas, bulletins, notices, announcements, charts, maps, photographs, brochures, drawings, manuals, reports of scientific study or investigations, schedules, price lists, telegrams, teletypes, phono-records, magnetic voice or video records, tapes, summaries, magnetic tapes, punch cards, recordings, discs, computer printouts, or other data compilation from which information can be obtained or translated.

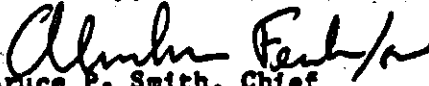


You are entitled to assert a claim of business confidentiality covering any part of the submitted information, in the manner described in 40 C.F.R. Section 2.203(b). Information subject to a claim of business confidentiality will be made available to the public only in accordance with the procedures set forth in 40 C.F.R. Part 2, Subpart B. Unless a business confidentiality claim is asserted at the time the requested information is submitted, EPA may make this information available to the public without further notice to you.

The factual and legal discussions contained in this letter are intended solely for notification purposes. They are not intended to be and can not be relied upon as a final Agency position on any matter set forth herein.

If you have any questions please contact Mr. Francisco Barba at (215) 597-8309.

Sincerely,

  
Bruce P. Smith, Chief  
Hazardous Waste Enforcement Branch

Enclosure(s): Location Map

cc: Donald A. Lazarchik, PADER  
Gene Lucero, EPA - OWPE

AR500116



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

841 Chestnut Building  
Philadelphia, Pennsylvania 19107

JUL 3 0 1988

Mr. Daniel Pinkey  
RDZ, Box 139  
Tamaqua, PA 18252

Re: Eastern Diversified Metals Site  
Hometown, Schuylkill County, PA

Dear Mr. Pinkey:

We have not received your response to our information request letter dated April 2, 1986. The information requested was due within ten (10) calendar days of receipt of that letter.

If you feel that the information that you provided to our contractor's personnel (Techlaw, Inc.) during an interview is all you have to contribute, please send us a letter indicating this and we will accept your response.

I will be expecting a written response from you within ten (10) calendar days of receipt of this letter. If you have any questions, please call me at (215) 597-8309.

Sincerely,

A handwritten signature in cursive script that reads "Francisco Barba".

Francisco Barba, Compliance Officer  
PA CERCLA Remedial Enforcement Section

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Reply  
8/10/86

485

feature

# PCB's—prevalent and persistent

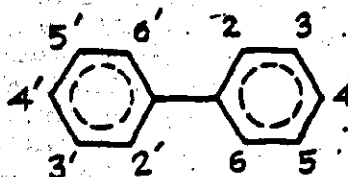
Intensified research is needed to minimize their dangers

Carl G. Gustafson, Federal Water Quality Administration, Athens, Ga.

During the past three years, a special class of compounds, called polychlorinated biphenyls (PCB's), has claimed the attention of ecologists and pesticide analysts in this country. These compounds were not discovered in the environment until 1966 in Sweden and 1967 in the U.S., despite the fact that they have been available commercially for 40 years. Interest in PCB's has arisen because they are frequently found in fish, bird, water, sediment, and other environmental samples when such samples are examined for chlorinated pesticide residues. That a wide variety of samples containing PCB's has been collected from England, Scandinavia, The Netherlands, Antarctica, Central America, and many different parts of the U.S. makes them truly ubiquitous pollutants.

Polychlorobiphenyls are made by substituting chlorine atoms for one or more of the hydrogen atoms at the

numbered positions of the biphenyl structure.



In the process of replacing hydrogen atoms with chlorine atoms, a large number of substitution combinations arise. For example, three monochlorobiphenyl isomers are possible, 12 dichlorobiphenyl isomers, 21 trichlorobiphenyl isomers, and so on. Theoretically, 210 compounds can be prepared by this substitution process; a typical example would be 2,4,6,2',4'-pentachlorobiphenyl.

Whenever aromatic hydrocarbons such as biphenyls are chlorinated, the product is a mixture of compounds, including isomers. It is quite difficult to synthesize single, specific chlorobiphenyl compounds in the laboratory unless involved procedures are employed. Consequently few of the individual compounds have been prepared in the pure form for study.

In the commercial process for PCB manufacture, biphenyl is chlorinated with anhydrous chlorine in tall cylindrical towers with either iron filings or ferric chloride as the catalyst. The by-product is hydrogen chloride; the product is a mixture of several PCB's. The degree of chlorination is determined by measuring the specific gravity of the mixture or, when the product is more viscous, the ball-and-ring softening-point test is used. The whole process takes from 12 to 36 hours.

In the U.S., the sole manufacturer of PCB's is the Monsanto Co., which markets them under the trade name

Aroclor. PCB's are also manufactured in Europe and Japan, under trade names such as Phenochlor and Clophen. The various Aroclors are differentiated by a four-digit number, with the last two digits indicating the percentage of chlorine in the mixture.

## Properties

The three most important physical properties of the PCB's are low vapor pressures (they have high boiling points), low water solubility, and high dielectric constants. They are miscible with most organic solvents and compatible with many types of polymers. Although some individual polychlorobiphenyl compounds are crystalline, the Aroclor mixtures are either liquids or resins.

The chemical properties that make PCB's desirable industrial materials are their excellent thermal stability, their strong resistance to both acidic and basic hydrolysis, and their general inertness. They are quite resistant to oxidation. Monsanto reports, in a technical bulletin on PCB's, that they can be heated to 140° C. under 360 ps.i. of oxygen pressure "without showing any evidence of oxidation as judged by development of acidity or formation of sludge."

The physiological properties of the PCB's make them potentially significant contaminants of the environment. For any pollutant, two factors are involved: acute toxicity, which is immediately evident because of a high death rate or other maiming effect; and chronic toxicity, which is the result of a slow accumulation of the poison in the body and is a sublethal effect. Whenever acute toxicity is high, a pollutant will be readily recognized and appropriate remedial actions will be introduced. If, on the other hand, acute toxicity is low,

*The Monsanto Co. stated recently in a letter to Congressman William F. Ryan of New York that as of August 30, it would no longer sell PCB's to customers for use in general plasticizer operations where disposal of the end-products cannot be controlled. After some lag period—the time it takes to eventually dispose of the products made from PCB's and currently in processor's inventories—the quantity of PCB's getting into the environment may be substantially reduced. If Monsanto's former customers look for PCB substitutes, rather than purchasing PCB's from manufacturers in Japan and Europe, the projected decrease could become a reality.*

Carl G. Gustafson

the physiological effects will go unnoticed until the chronic effects make themselves evident. When this happens, the problem may have advanced beyond immediate or easy correction.

#### Acute toxicity

All studies of PCB's in animals indicate that acute toxicity is not a significant factor. Their acute toxicities are on the order of those of other chlorinated aromatic compounds. Monsanto has sponsored two investigations of the acute toxicities of Aroclor mixtures. In the first, at the Kettering Laboratory at the University of Cincinnati, Dr. J. F. Treon and his co-workers investigated the toxicity of Aroclor vapors for guinea pigs, mice, rabbits, and rats. All animals survived a 24-day exposure to 0.83 p.p.m. of Aroclor 1242 for 7 hours per day on 17 of those days. Even after more prolonged tests, there were no severe effects from Aroclor 1242. In the second investigation, still in process, three groups of beagles are fed Aroclor 1242, 1254, and 1260, respectively, at a rate of 100 p.p.m. in their diets. After three months no significant abnormalities have been noted.

Similar studies on fish have been performed in several laboratories. Dr. Richard Schoettger of the Sport Fisheries and Wildlife Fish-Pesticide Research Laboratory in Columbia, Mo., reports that 96 hour- $TL_{50}$  toxicities of the Aroclors to trout range from 1.17 to 60 p.p.m. Compared to DDT, whose 96 hour- $TL_{50}$  toxicity is 0.002 to 0.009 p.p.m. for trout, the PCB's have a relatively low acute toxicity. With the more sensitive bluegill, the 96 hour- $TL_{50}$  for Aroclor 1248 is 0.278 p.p.m., while that of DDT is 0.008 p.p.m. Aroclor toxicities appear to be inversely proportional to the chlorine content of the mixture.

Shellfish, oysters, and shrimp are more sensitive to PCB's. Dr. Tom Duke, at the Bureau of Commercial Fisheries Pesticide Field Station, reports 100% mortality of juvenile pink shrimp exposed to 0.10 p.p.m. of Aroclor 1254 in water for 48 hours. This concentration of Aroclor 1254 will cause a 100% decrease in shell growth of oysters after 96 hours. To achieve the same effects with DDT in these experiments, only 0.0006 p.p.m. and 0.01 p.p.m., respectively, were required.

There is very little evidence that PCB's are toxic to insects. Studies to date show that they are less toxic than

dieldrin or DDT. As with fish, their toxicity appears to be inversely proportional to the chlorine content of the mixture.

Based on the above data, it is understandable why the polychlorobiphenyls, commercially available for 40 years, have only recently attracted attention as toxic environmental contaminants.

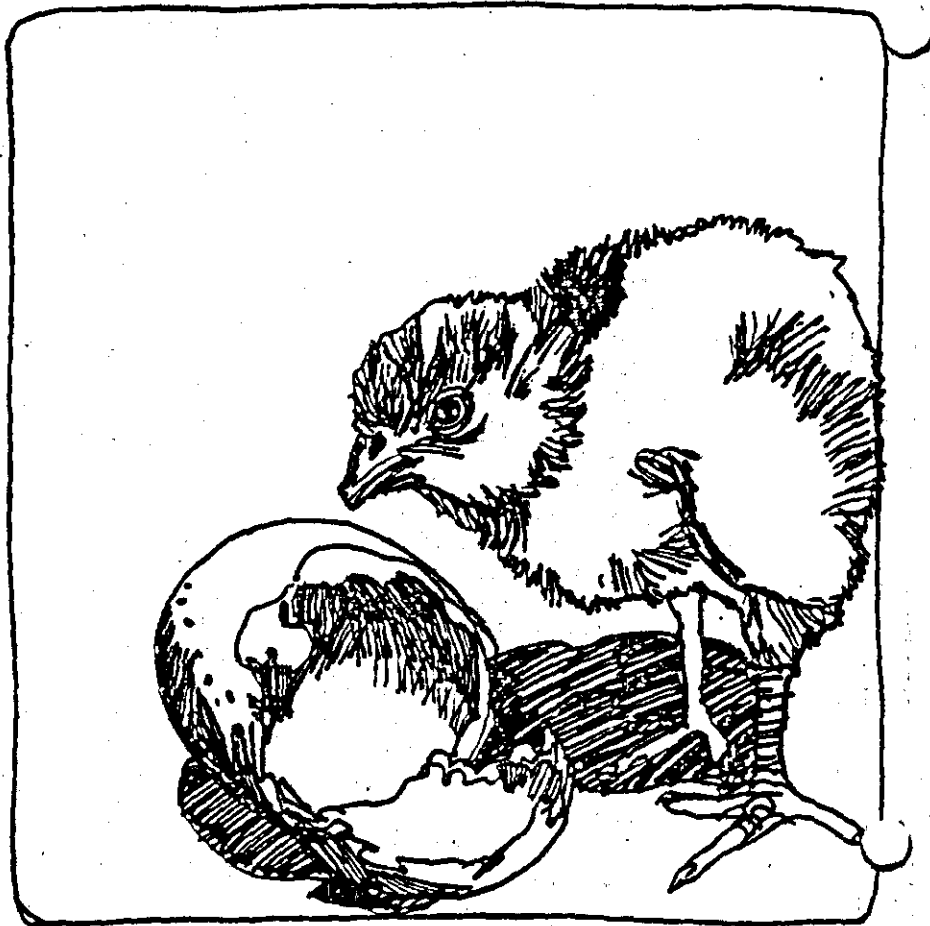
#### Chronic toxicity

The chronic toxicities of PCB's present a more disturbing situation; several chronic effects have been observed. It was discovered, quite by accident, that PCB's have a toxic effect on chickens. Professor E. L. McCune and his co-workers at the University of Missouri found their chickens dying after they were placed in a feeding house, parts of which had been freshly painted with an epoxy paint. Careful investigation revealed that the toxic factor was Aroclor 1242, a binder in the paint. When Aroclor 1242 was fed to the chicks it produced the same characteristic effects as chick edema factor. McCune reported: "Gross pathology included hydropericardium, hydroperitonium, enlarged heart, liver, and kidneys, and hemorrhage of internal organs. Mi-

croscopically the kidneys showed marked tubular dilation and numerous casts."

Another chronic effect of PCB's is related in wildfowl. The accumulation of high concentrations of chlorinated hydrocarbons in birds resulted in disruption of normal breeding behavior and in the formation of thin-shelled eggs. A dramatic example of this effect has been observed in the case of the brown pelican. On the Anacapa Islands off the California coast, no young were hatched last year from 300 pairs of nesting birds. The shells of most eggs laid were so thin that a dent occurred when the egg was picked up.

There are two possible causes for the laying of thin-shelled eggs by wildfowl. One is a low calcium reserve in the bird; the other is the inability of the bird to deliver the needed calcium to its oviduct, where the eggshell is forming. The calcium level in the avian biosystem and the calcium reserve in the secondary bone structure or medullary bone, found only in female birds when they are breeding, are controlled by the hormone estrogen. A high estrogen level is associated with the formation of this calcium reserve. Chlorinated hydrocarbons, such as DDT,



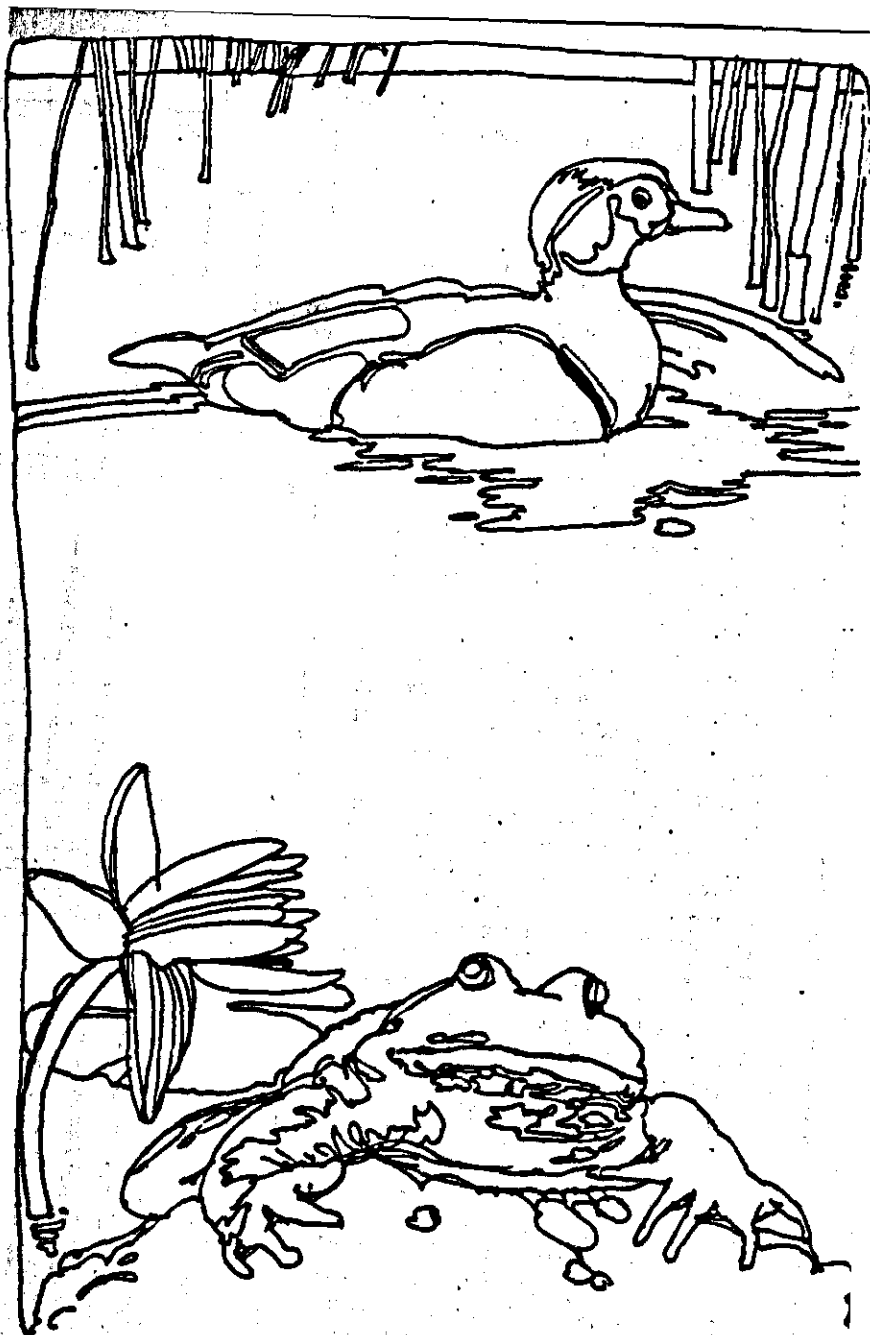
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chlordane, dieldrin, and PCB's, activate enzymes in the liver which transform estrogen into a more water-soluble compound that is readily eliminated from the bird's body. This means that when estrogen levels are low, calcium reserves will also be low, and therefore very little calcium will be available for strong eggshell production. Dieldrin and PCB's are more effective than DDT in this type of enzyme-induction activity. Aroclor 1262 has an estradiol degrading potential four to five times that of *p,p'*-DDT or technical grade DDT.

The ability of the female bird to deliver calcium to her oviduct during the last 20 hours, when the eggshell is being formed, is related to the functioning of the enzyme carbonic anhydrase. When birds that have exhibited the ability to lay normal eggs are injected with a metabolite of DDT (DDZ) just prior to the formation of the eggshell, they will lay thin-shelled eggs. This indicates that DDT also inhibits the activity of carbonic anhydrase, the enzyme that controls the flow of calcium from the blood stream of the bird into its oviduct.

Since dieldrin seems to have no effect on carbonic anhydrase, we may assume that neither do the PCB's. However, these compounds delay breeding time significantly. Many ornithologists feel that late breeding has a stronger influence on the reduction of bird populations than does the laying of thin-shelled eggs. If this is true, PCB's are a more potent threat than DDT to our declining bird populations, especially for predatory birds that accumulate fairly high levels of PCB's because they eat smaller animals that already have concentrated PCB's in their own tissues.

Other investigators have produced evidence to show that PCB's are similar to DDT in their activity. Dr. Joseph Street at Utah State University has shown that when PCB's accumulate in the liver, they induce microsomal enzyme activity by bringing about more rapid metabolism of drugs, insecticides, and other foreign compounds. He fed rats a diet containing 50 p.p.m. of Aroclor 1254 or Aroclor 1260. After 10 days on this diet, the test animals were administered hexobarbital at a dose of 100 p.p.m. to induce sleep. In comparison with a control group, the sleeping time for these rats was reduced by 65 to 80%. Street also found that Aroclor, when fed at the



same level, will reduce dieldrin storage in adipose tissue by 90 to 95%; increase aniline oxidation by 200 to 300%; and increase EPN detoxication by 430 to 470%. In addition, the PCB's cause activation of organothiophosphate compounds, which adversely affect the system. This latter effect counterbalances the detoxification of dieldrin.

Normally, when a substrate activates an enzyme, it is converted to a water-soluble form that will be eliminated from the system; however, this is not the case with PCB's. Because they remain in the system for prolonged periods of time, their enzyme induction activity is always present. In this way the normal concentration of important body chemicals may be lowered to the

point of bringing about malfunction in the system. For example, Street believes that the PCB's bring about steroid degradation, which can lead to all endocrine relationships.

The chronic toxicity to man follows:

Like the chlorinated naphthalen the chlorinated diphenyls have two distinct actions on the body, namely, a skin effect and a toxic action on the liver. The lesion produced in the liver is an acute yellow atrophy. This hepatotoxic action of the chlorinated diphenyls appears to be increased if there is exposure to carbon tetrachloride at the same time. The higher the chlorine content the diphenyl compound, the more toxic it is liable to be. Oxidized chlorinated diphenyls are not

toxic than the unoxidized materials.

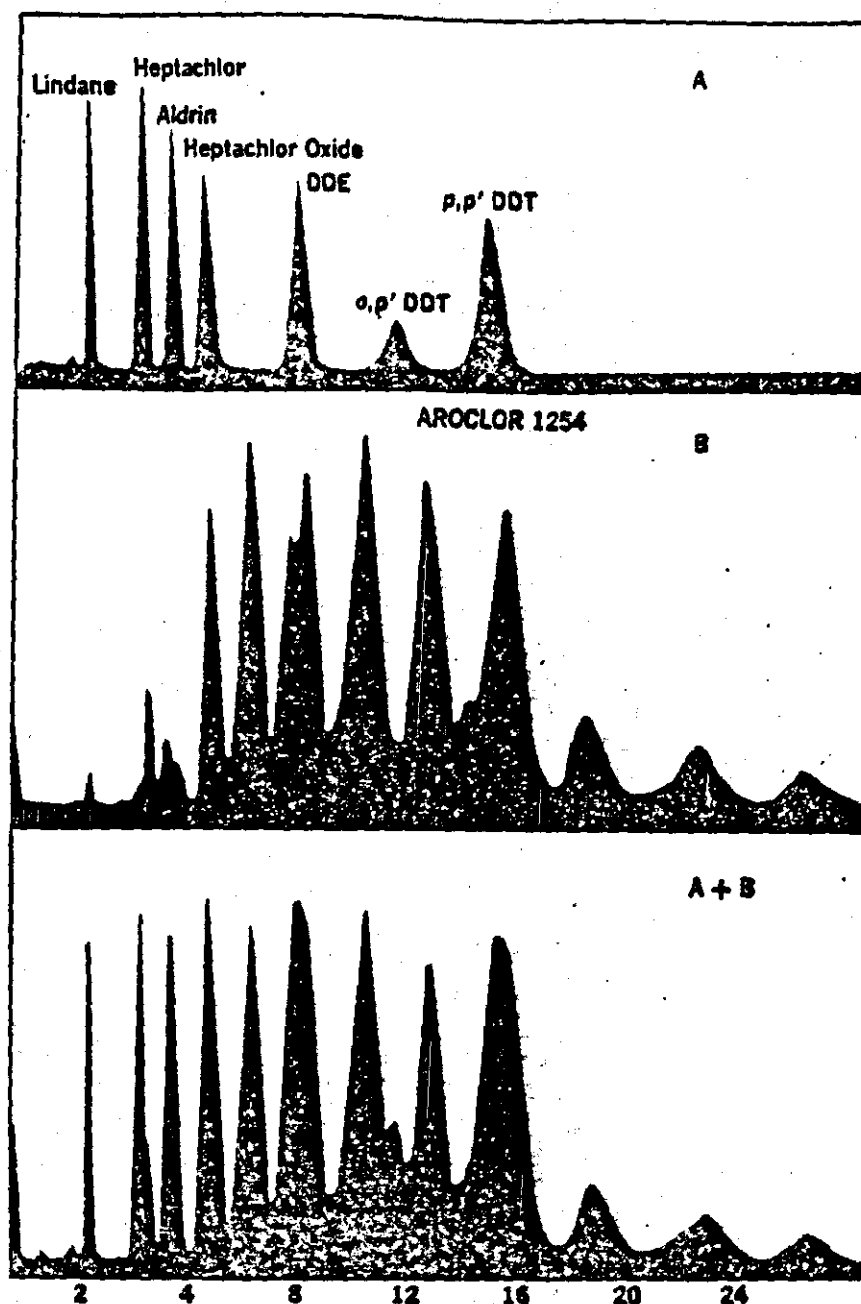
The skin lesion is known as chloracne, and consists of small pimples and dark pigmentation of the exposed areas, initially. Later, comedones and pustules develop. In persons who have suffered systemic intoxication, the usual signs and symptoms are nausea, vomiting, loss of weight, jaundice, edema, and abdominal pain. Where the liver damage has been severe, the patient may pass into coma and die.

Sax, N. Irving, "Dangerous Properties of Industrial Materials," 3rd ed., Van Nostrand-Reinhold, New York, 1968.

The ubiquity of PCB's is related to the wide spectrum of applications that have been found for them. The largest single use of PCB's is related to their electrical properties—as coolant-insulation fluids in transformers. For this purpose the Aroclors are also sold under such trade names as Chlorextol (Allis-Chalmers Mfg. Co.), Dykanol (Federal Pacific Electric Co.), Inerleen (Westinghouse Electric Co.), No-flamol (Wagner Electric Co.), Pyranol (General Electric Co.), and Thermi-nol (Monsanto Co.).

Other uses of PCB's include formulation into ballasts for fluorescent fixtures; impregnation of cotton and asbestos for braided insulation of electrical wiring; a plasticizer in wire and cable coatings; capacitors and askarel-type transformers; and plasticizers of vinyl chloride polymer films. Because of their thermal stability and fire resistance, the PCB's also find application in high-pressure hydraulic fluids, specialized lubricants and gasket sealers, heat transfer agents, and machine tool cutting oils. Miscellaneous uses include: formulation into some epoxy paints; protective coatings for wood, metal, and concrete; adhesives; and in carbonless reproducing paper. One of the primary manufacturers of carbonless reproducing paper also sells Aroclors in an encapsulated form.

Generally the kinds of applications described above mean that the PCB's will be in many types of products that eventually find their way to the domestic market. When used in manufacture of ballasts for fluorescent fixtures they will be found in kitchens, bathrooms, stores, and offices throughout the country. Wherever office forms are used that do not use carbon paper, one may find PCB's formulated into the micro-capsules of dye that comprise the re-



Gas chromatogram A is of a standard pesticide mixture, B is typical of Aroclor 1254, and A + B is the chromatogram of a 50 : 50 mixture of both. The concentration of Aroclor 1254 is approximately 10 times those of the pesticides in A, hence it is understandable why PCB's were not readily recognized in pesticide chromatograms. Gas chromatograph (Packard 7620) conditions: gas flow 80 ml./min. nitrogen; temperatures—oven, 210° C., inlet, 230° C., detector, 218° C.; Ni<sup>63</sup> electron capture detector; 5' x 1/8" glass column packed with 8% SE-30 on Chromosorb Q 80-90 mesh.

producing layer of the business form. PCB's have also been found on the transparent receipts used in credit card charge forms. As plasticizers they can be expected to appear in many consumer plastics.

Since the chronic toxicities are so significant, it becomes important to know just how extensively the PCB's are distributed in the ecosystem, and just how they find their way into

the environment. Rainwater in England, brown seals off the coast of Scotland, white-tailed eagles in Sweden, cod in the Baltic Sea, mussels in The Netherlands, adelic penguin eggs in the Antarctica, brown pelican eggs in Panama, Arctic terns, shrimp in Florida, river water in Japan, waters in the Great Lakes, human hair, and human adipose tissue—samples of all these have been found to contain PCB's.

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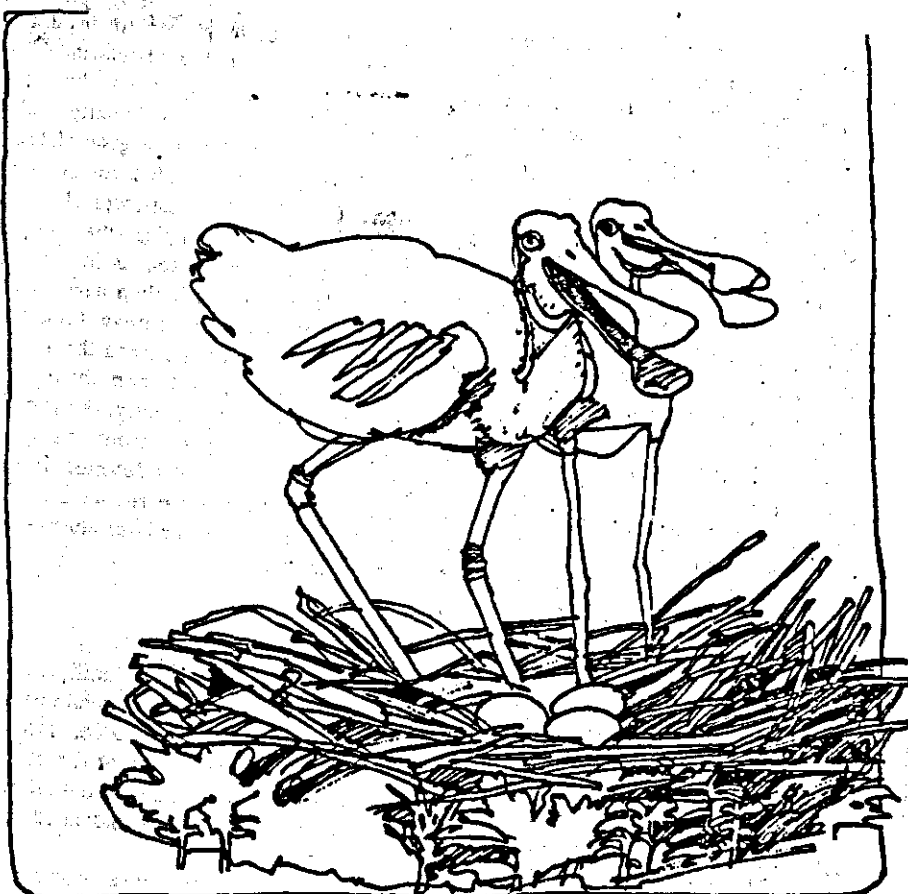
thus making them a class of widely dispersed pollutants.

### Readily absorbed

The properties of PCB's that make them industrially useful are the same properties that cause them to persist in the environment. These include thermal stability, resistance to oxidation and hydrolysis, solubility in a wide range of organic solvents, water insolubility, high dielectric constant, and compatibility with many types of macromolecules. Their resistance to oxidation and hydrolysis also makes PCB's more stable and persistent than DDT. Consequently, they could eventually accumulate to a higher concentration than DDT, especially if the use of DDT is sharply curtailed in the U.S.

The solubility of PCB's in nonpolar solvents explains why they are readily absorbed into fatty tissue and into the liver. Their resistance to oxidation or other types of chemical degradation explains their persistence in the environment and accumulation in animal tissue. The latter effect is enhanced both by their insolubility in water and solubility in organic solvents. Their chemical inertness and resistance to metabolism account for their low acute toxicity. But as they slowly build up in a living system their concentration approaches toxicity levels, at which point chronic effects make themselves evident.

It has been established that fish-eating birds will accumulate large concentrations of PCB's, as in the case of the white-tailed eagle, which has been found to have as much as 14,000 p.p.m. of PCB's. Peregrine falcons, taken off the coast of California, were found to have as much as 2000 p.p.m. in their lipid tissue. When shrimp were exposed to 10 p.p.b. of Aroclor 1254 for 48 hours, they accumulated 1300 p.p.b. of PCB's, which represents a 130-fold concentration in a very short time. Oysters, exposed to an identical concentration of Aroclor 1254 for 96 hours and then placed in PCB-free water for four days, still had a concentration of 33,000 p.p.b. of PCB's, which constitutes a 3300-fold concentration. This means that even though the concentrations of PCB's are in the parts-per-billion range in the environment, their high lipid solubility causes them to collect in fatty tissues of lower animals and marine life. Therefore, species at the top of a food chain will also accumulate PCB's in their bodies, particularly in their lipid tissue and liver, in much the same



way as they accumulate DDT and other chlorinated pesticides.

Because of the low solubility of PCB's in water, when a solution or dispersion of them is discharged into a river or lake, they will accumulate on the sediment in relatively high concentrations. Subsequently, they will redissolve very slowly in the water as conditions change. Therefore, it will usually take a long time to flush out a contaminated area.

### Accidental occurrence

The reason that PCB's have not been found in the ecosystem as extensively as DDT, and are not present in environmental samples at as high a concentration as DDT, is that PCB's find their way into the environment accidentally. DDT is deliberately spread because this is the only way its insecticidal properties can be utilized. PCB's are not intended to get into the environment, but they do because their unique chemical properties prevent them from being destroyed by our usual waste disposal methods. Thus, they inadvertently escape and become widely dispersed.

In Sweden, where the use of DDT has been banned, and where the main power source is hydroelectric, investi-

gators find that the concentration of PCB's in the environment is as high as that of DDT.

There are several ways by which PCB's get into the ecosystem. One of these is by incineration. Products containing PCB's, such as carbonless reproducing paper in business forms, plastics (especially polymer film and sheeting that contain PCB's as plasticizers), spent ballasts from fluorescent light fixtures, and objects coated with PCB-formulated coatings, all find their way to the city dump or incinerator for burning. The PCB's do not burn but are vaporized. They are then carried into the atmosphere, where they collect on particulate matter and are subsequently returned to the surface of the earth, into the rivers, lakes, and oceans. In this way they become widely distributed throughout the global environment. Another source is probably land run-off from industrial wastes and dumps. A third source is the point of manufacture and the plants where PCB's are processed into other products. They can escape through the plant ventilation and exhaust systems into the atmosphere and through its waste treatment system into sewers or directly into waterways.

It is interesting to note that the incidence of PCB's in environmental samples is highest in industrialized and urbanized areas. Birds whose primary habitat is the San Francisco Bay area have a larger concentration of PCB's per unit of body weight than those located in Baja, Calif., which is completely rural. Aquatic life in the Archipelago of Stockholm, the most industrialized area of Sweden, were found to have a higher concentration of PCB's than fish samples taken from the western coast of Sweden, a less developed area. Sediment samples taken from southern portions of Lake Michigan have a higher concentration of PCB's than those from other parts of the lake.

Monsanto states that until a recent change in marketing policy (see inset, page 814), sales of Aroclors were increasing at the rate of 8% per year. While this increase does not seem significant, it may be important if the increased consumption was in consumer products and thus would find their way into our normal solid waste disposal systems. Such an occurrence would mean a definite increase of PCB residues in the environment, and therefore a marked increase in their chronic toxic effects.

#### Detection

PCB's were not discovered in environmental samples until very recently for several reasons. First, as indicated above, they have not been deliberately distributed about the ecosystem. Secondly, because of their relatively low acute toxicities, their presence was not immediately evident. Finally, they are difficult to detect analytically.

The PCB's were first detected as interfering peaks in the gas chromatographic analysis (GC) of environmental samples being analyzed for chlorinated pesticide residues. When PCB's are present in a sample they give a pattern of several GC peaks, whose retention times are similar to those of dieldrin, DDT, DDE, aldrin, and heptachlor oxide. Because the peaks were not large or sharp, investigators tended to ignore them until S. Jensen, in Sweden, and R. Risebrough, at the University of California at Berkeley, identified them as corresponding to common constituents of environmental samples being analyzed for persistent pesticides.

The problem of the interferences of PCB's with the analysis of other chlorinated pesticides has been largely overcome by prior treatment of the sample. Several investigators have used

column chromatography to separate PCB's from chlorinated pesticides. At a recent meeting, sponsored by the FWQA's National Water Quality Laboratory, Duluth, Minn., a general procedure was recommended for separation of PCB's from pesticides. In this procedure for biosamples, the sample is extracted with hexane as in regular pesticide analysis. It is then partitioned with acetonitrile to remove fats, the cleaned-up extract is passed through a Fluorisorb column and then through a silicic acid column. Finally, the sample is analyzed by gas chromatography, with a chloride-specific detector. In this way the pesticides are retained on the silicic acid column for later elution and identification.

#### Research needs

To assess fully the significance of PCB's as environmental pollutants, additional research is needed. No one really knows the extent of the chronic effects of these chlorinated hydrocarbons. Some problems that need to be considered are:

- Although PCB's are known to accumulate in human organs we do not know at what concentration they will begin to exhibit toxic effects. Will these chronic effects be similar to those shown in animals—microsomal enzyme activity, calcium metabolism inhibition, and so on? What are other possible chronic effects?

- Which of the many PCB compounds in the commercially available mixtures are responsible for their toxicity? Can commercial PCB mixtures be modified to eliminate the toxic components? Pure samples are required to answer these questions. At the present time work is continuing at the FWQA's Southeast Water Laboratory to separate each of the Aroclor mixtures into its many components, and to identify each component.

- We need to know all the uses for the PCB's. What is the annual production of PCB's? Our knowledge of these facts is limited and needs to be expanded. These facts should be known if we are to accurately determine how they get into the environment, and take steps to prevent further environmental contamination by them.

- In view of the complexity of the isolation and accurate quantitative analysis of PCB's in chlorinated residues, a straightforward, unambiguous measurement of them needs to be developed.

- What is the fate of PCB's in natural waters? More needs to be known of their partition coefficients between bottom sediments and water. This is vital if we are to estimate how long it will take for a river bed to clean itself of contamination. It will also be useful when assessing the effects of PCB's on marine life that feed on the bottoms of lakes, rivers, and estuaries. We should also learn more about PCB solubility in water of various ionic strengths.

- Are present waste treatment systems adequate to handle PCB's? Do special measures need to be taken when PCB's are part of the waste effluent being treated?

By trying to get some of these answers now, we may find that we are in a position to control the escape of PCB's into the environment before additional damage is done. So frequently, action is taken only after it is evident that massive damage has resulted from a particular pollutant. In the case of the PCB's we may have an opportunity to resolve the situation before that happens.

#### Additional Reading

- Hubbard, H. L., "Chlorinated Biphenyl and Related Compounds." Encyclopedia of Chemical Technology, 2nd ed., 5, Interscience Publ., New York, N.Y., 1964, pp. 289-298.
- Reynolds, L. M., *Bull. Environ. Contam. Toxicol.* 4, 128 (1969).
- Risebrough, R. N., et al., *Nature* 220 (1968).



Carl G. Gustafson, chairman of the Department of Chemistry of King's College, Briarcliff Manor, N.Y., received a Ph.D. in organic chemistry from the University of Delaware in 1957. During the 1969-70 academic year, he was on leave at the FWQA Southeast Water Laboratory in Athens, Ga., where he studied trace organic analysis in waste effluents. As a member of the National Water Contaminants Characterization Research Program, he worked with PCB's and pulp and paper mill effluents.



# New Pollutant Stirs Fear of 'DDT Crisis'

(Phila. Inquirer 7/12/70)

By RICHARD POTIER

Special to The Inquirer

MIAMI, July 11. — A poisonous man-made chemical, nearly as deadly and long-lasting as DDT, is slowly diffusing through the entire environment of Florida and the rest of the nation — creating fear of another "DDT crisis."

The new pollutant has recently started turning up in fish, birds, water and even man. It's quickly becoming almost as prevalent in some birds and animals as DDT is itself.

Scientists believe the new chemical is virtually a "classical case study" of how a harmful pollutant can spread through the ecological system before it's even identified.

## IT IS PERSISTENT

This new environmental threat carries a deceptively simple name. Scientists call it "PCB," short for "polychlorinated biphenyl." PCB doesn't occur naturally — it's made from benzene, a petroleum derivative.

PCB is used extensively in manufacturing, although it's made by just one company — Monsanto Chemical Co. Like DDT, PCB is "persistent," which means it doesn't break down quickly in nature — or in the bodies of fish, birds, animal life and even man. Scientists are still looking for data on possible longterm effects of PCB on all forms of life on earth.

PCB is used in the manufacture of such divergent products as pesticides, ink, plastics and electrical insulation. It's even found in some of the plastics bags used in supermarkets.

## EVIDENCE IT'S TOXIC

As these products decompose, the PCB remains intact — to be picked up later in the "Food Chain" and work its way up the chain of fish, eagles and man.

"We've turned up some pretty sizable levels here in Florida," says Jack Lowe, a fish research biologist at the U.S. Bureau of Commercial Fisheries lab in Gulf Breeze, near Pensacola.

"There is evidence now that this compound is toxic to fish and animals.

"We've found it in fish, shrimp, oysters, crabs, any number of things. It appears that PCB are toxic to shrimp, for one, but we're still working on it.

## PARALLELS TO DDT

"When we turned these residues up, we thought it was reason to be disturbed, since the compound is chemically related to pesticides," Lowe added.

Other Federal biologists said pesticides such as PCB are being found in dead birds, particularly bald eagles, in about the same amount as DDT — which has been blamed for many bird deaths.

The case of PCB has been something of a scientific detective story, but one in which science for a long time was outfoxed by the pollutant.

PCB is chemically so close to DDT, that chemists only recently isolated and identified it for the first time. By then, however, PCB had become widely disseminated through America and Europe.

## HOW IT'S MAGNIFIED

Like DDT, PCB travels through the food chain in a process called "biological magnification." Little creatures collect and concentrate the chemical, then are eaten by larger creatures, which in turn are eaten by something else.

Since the larger creatures eat many of the smaller ones, PCB is concentrated along each step until the animal at the top of the food chain — usually the bald eagle — ingests a large concentration.

Monsanto makes PCB at two plants, in Alabama and at Saugat, Ill.

Leakage in Alabama last year produced a major fish kill, according to Bill Woods of the Florida Game and Fresh Water Commission.

At Federal request, Monsanto is organizing to reduce PCB and to recover the chemical from manufacturing processes. But the compound appears to be widespread.

# A New Horatio Alger Tale

(New York Times 10/18/70)



By GERALD J. MEYER

*"I had a chip on my shoulder, to tell you the truth. I had to prove to myself that I was as good as the people who had ... a formal education. I was driven."*

AR500125

ST. LOUIS—Ben Fixman is the kind of man about whom Horatio Alger wrote those success stories. He started working at the age of 6, dropped out of school to help his widowed mother, and now at 45 is chairman of one of the largest corporations in America. He would not seem to have many things to regret.

But Mr. Fixman does admit to regretting one thing. He wishes that his company, Diversified Industries, Inc., did not live up to its name so fully. If he could build his business all over again, he says, he would make it much less diversified.

"We started acquiring companies to protect ourselves against economic conditions," Mr. Fixman explained. "Had we known what we know today, we wouldn't have done it. We would have stayed specifically in the metals field without getting into any of the rest of it. From now on, our emphasis is going to be on growth in the metals area. In metals processing technology, we are just at the beginning."

In other words, Diversified Industries, which until last year was known as the Diversified Metals Corporation, and now includes more than 30 separate companies producing everything from ball-point pens to fabrics, is now refocusing its attention on what made all the rest possible—metal.

Mr. Fixman was born in 1925 in the tough Kerry Patch District of St. Louis,

and his father died when he was a year and a half old. His immigrant mother could not speak English, and was barely able to keep her five children from being put into an orphanage.

When he was 6, Mr. Fixman began working after school as a newsboy and later as a janitor. His formal education ended after eight months of high school when he began to work full time for a manufacturer of women's clothing.

"At 21, after becoming assistant to the president of the firm, I left to go into the clothing business for myself with the fortune I'd accumulated," Mr. Fixman recalled. "It was \$3,000, and I quickly learned that it was inadequate."

He then bought a truck and began traveling through the Midwest, buying and selling scrap metal. He "went into the metals business cold, out of necessity," he said. "because I had a pregnant wife and I had to do something."

Business was good for a brief period, but in 1949 a recession ended it. Then he went into the landscaping business, but a strike forced him out of that, too. In 1950 he sold baby chairs from door to door, and then he returned to the scrap metals business.

Mr. Fixman bought his first scrap yard in 1951. In 1954, with a partner, whom he bought out two years later, he formed the Fischer-Fixman Metals Company. In 1956 Diversified Metals was born, and it grew rapidly, spurred by Mr. Fixman's ambition.

"I had a chip on my shoulder, to tell you the truth," he said. "I had to prove to myself that I was as good as the people who had an opportunity to get a formal education. I was driven. I also had the advantage of being one of the younger men in the scrap business. Most young men don't want to go into the scrap metal business today, and that was true 20 years ago, too. I could see opportunities that my competitors couldn't."

The growing company went through a period of crisis in the early nineteen-sixties when Mr. Fixman began searching for new ways to get copper from old insulated wire that he bought all over the world. The traditional reclaiming method, burning, was dirty and inefficient, and Mr. Fixman sought a way to remove the insulation mechanically. He invested heavily in research

and was almost out of money before the company's now famous "cold process" was discovered.

"We didn't think we were going to lick it," Mr. Fixman said. "We were about to go broke — we'd spent half a million dollars and had no results. Strange as it sounds, I thought of the solution in my sleep—that's the gospel truth. I woke up in the middle of the night, 'I've got it.' My wife thought I was crazy."

The process uses a combination of ore-dressing and coal-cleaning machines to separate aluminum, copper and other metals from rubber and plastic insulating material.

From that point, as Mr. Fixman proudly recalled, Diversified "grew by leaps and bounds," expanding, acquiring, reaping profits. The company went public in 1956 and was first listed on the New York Stock Exchange Sept. 10, 1963.

Diversified had heavy losses early this year, but Mr. Fixman confidently predicts profits for the year as a whole. New techniques in metals reclamation now being perfected by the company's research division, he asserted, will be as revolutionary as the cold process was.

Diversified Industries reported a net loss of \$3,211,166 on sales of \$92,535,707 for the quarter ended July 31.

For the nine months ended July 31, the company had sales of \$259,802,385 and earnings of \$1,550,255, or 27 cents a share. Net income for the year that ended last Oct. 31 was \$3,148,339.

Mr. Fixman said that he was not surprised by his 20-year transformation from baby chair salesman to captain of industry. "I've been too busy to be surprised," he said. "I have only one major enthusiasm—my work. I enjoy business."

He is not a conspicuous member of St. Louis's commercial or social establishments—"I couldn't care less about that," he said—and he is known for maintaining close friendships with unimportant persons he has known since childhood.

He is a philanthropist who refuses to discuss his philanthropies. His associates speak of him as a man who cannot tolerate inefficiency, who peremptorily fires people he considers unproductive, generously rewards those who are productive and loyal and never forgets or forgives a double-cross.

"I have been accused of being a tyrant," he said. "So be it."

Mr. Fixman and his wife, who live in Ladue, Mo., have three daughters and two granddaughters.

Last year a trade magazine, Scrap Age, named Mr. Fixman its "man of the century." This year, talking about the honor and about his career, Mr. Fixman explained his success.

"My method is Jewish engineering," he said. "You solve the problem or you starve."



AR500127



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street Building  
Philadelphia, Pennsylvania 19103-2029**

DEC 14

The Honorable James Rhoades  
Pennsylvania State Senator  
32 East Centre Street  
Mahanoy City, PA 17948

Dear Senator Rhoades:

Thank you for your letter dated November 19, 1999 in which you requested that we advise you of the latest developments concerning the cleanup of the Eastern Diversified Metals Superfund Site (Site) in Rush Township, Pennsylvania. After providing a formal opportunity for the public to comment on a proposed remedy, we hope to make a decision regarding the best way to protect public health and the environment at this site in early spring. We are currently reviewing a draft analysis of cleanup alternatives prepared by Lucent Technologies, a party responsible for contamination at the site. Based on information contained in the final analysis, we plan to evaluate which remedy best addresses the site problems and announce a preferred alternative to the public in a Proposed Plan this winter. We will then solicit public comments during a 30-day period and, after considering and addressing all public comments, make a final decision regarding the cleanup of the site.

Mr. Pinkey and other residents of Rush Township have had a long history with the site as is evident from the correspondence Mr. Pinkey included in his letter to you. In fact, their interest and concern may have been largely responsible for bringing the site to the attention of the federal Superfund program. We understand Mr. Pinkey and some other members of the public have concerns about the possibility that the fluff pile may be capped on-site and hope they will express their concerns during the public comment process so we can ensure that their concerns are factored into our decision regarding the remedy.

Under the Superfund Law, the U.S. Environmental Protection Agency (EPA) must select a remedy that is protective of public health and the environment and is cost effective. After attempts to recycle the fluff piles failed in 1996, we have been working with Lucent Technologies to identify other options to clean up the site which would protect the public, satisfy environmental regulations and be cost effective. Some options, such as incineration, are likely to be far too expensive to implement under the law. We are also weighing the risk from transporting waste off-site. It would require an extremely large number of trucks through the community to remove all of the 250,000 cubic yards of fluff. Even if treated, the material must still be disposed of somewhere in a landfill near the site. EPA would be moving the material from one community to another, possibly resulting in protests and resistance from those affected residents.

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One option under serious consideration is in-place closure or capping of the main fluff pile. Because capping would protect the public from contact with the waste and would comply with existing environmental regulations at a relatively low cost, we allowed Lucent Technologies to proceed with studies designed to show if capping the fluff pile was technically feasible. The results of these studies showed that capping is technically feasible and that the cap could likely be designed in a way which would allow redevelopment of a four to six acre area. To let the public know of this development, we issued fact sheets from February through August 1999, and organized and participated in a town meeting in July.

I hope this provides you with the information you need to respond to your constituent. If you have any additional questions, please feel free to contact me or have your staff contact Ms. Cynthia Yu-Robinson, Pennsylvania Liaison Officer, at 215-814-5557.

Sincerely,

  
H Thomas C. Voltaggio  
Acting Regional Administrator

AR500129

CONCURRENCES

SYMBOL	3HS22	3HS22	3HS20	3HS00	3HS00	3CG10	3R100	3R100	3R100
SURNAME	VAVRA	KRYSTAL	SCHAUL	PASCAL	FERDAS	ROBINSON	VOLTAGGIO		CYR
DATE	12/17/99	12/17/99	12/17/99	12-16-99	12/18/99	12/18/99	12/18/99	12/18/99	12/18/99

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