MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION OIL & HAZARDOUS MATERIALS REPORT FORM

Spill Number A - 266 - 93

DP

SUBJECT / OWNER OR OPERATOR

Name (Last, First, MI): DRAGON PRODUCTS

Address: P. O. BOX 191 Town: THOMASTON

State: ME Zip: 04861 Telephone: (207) 594-5555

Comments:

LOCATION / FACILITY INFORMATION

Spill Location: DRAGON PRODUCTS

Address: U. S. ROUTE 1 Location ID: 18876

Town: THOMASTON Zip: 04861

Latitude N: / / Longitude W: / /

SPILL / EVENT INFORMATION

Spill Type: C (Table A) Amount Spilled: 100.00 G (Gals, Yds3, Lbs or Bbls)

Product Reported Spilled: 71 (Table B) Product Actually Found: 71 (Table B)

Date Of Spill: Time Of Spill: (Military)

Date Reported: May. 24, 1993 Time Reported: (Military)

Cause Of Spill: 00 (Table C) Detection Method: 2 I (Table D)

Incident Code: A - ID - L - (Table E)

DEP response time involved: 18 Wells At Risk: Wells Impacted:

Investigators' names : GEHRLING, FRANCIS

PERSON REPORTING EVENT

Name (Last, First, MI): STEVE WALLACE-DRAGON PRODUCTS

Address: P. O. BOX 191 Town: THOMASTON

State: ME Zip Code: 04861 Telephone: (207) 594-5555

CLEAN-UP INFORMATION

Spill Number A- 266 - 93

Total Product Recovered: 3,500.00 G (Gals, Yds3, Lbs or Bbls)

Method of Recovery : G J

Non Recyclable : (Gals or Bbls)

Solids Combustible : (Yds3 or Tons)

Solids Non Combustible: 45.00 Yds3

Recyclable: (Gals, Yds3, Lbs or Bbls)

Number Filters Installed: 0

Number Aerators Installed: 0

Disposal Information : All materials manifested as hazardous waste.

OTHER ACTIONS

Expenditure (s) - From Surface Water Fund	N	(Y	or	Ν)
· From Ground Water Fund	N	(Y	or	N)
From Haz Waste Fund	N	(Y	or	N)
Third Party Damage Claim Expected	N	(Y	or	N)
Enforcement Referral			Y	or	N)
Insurance Fund Claim			Y	or	N)
Tech Services Referral	N	(Y	or	N)

UNDERGROUND TANKS INFORMATION

UNO/UST	Tank	Size Of	Tank	Tank	Piping	Tank
Site Number	Number	Tank	Material	Age	Material	Status

Please use separate sheets of paper, as needed, for your detailed Recommendations and Spill Narrative.

Remember to include/attach directions to find spill site (with a map if possible), all observations made, clean up actions performed and photos (if taken).

A-266-93

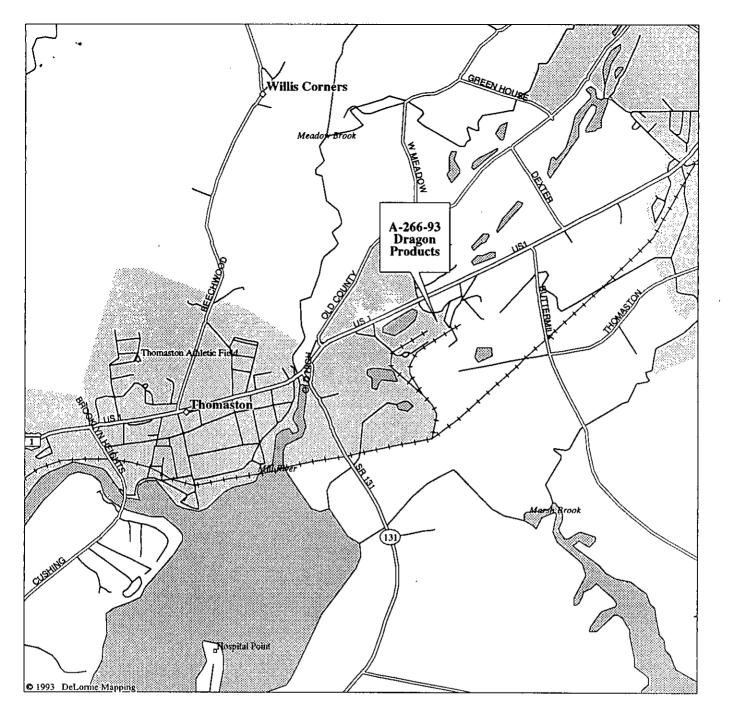
Dragon Products, Thomaston

Steve Wallace of Dragon Products contacted me in early 1993 to notify me about plans for the removal of a 20,000 gallon fuel oil tank at the cement kiln site. In March I inspected and gave my permission to abandon the tank in place. The site is an industrial site and removing the tank would possibly cause some structural problems in the rolling mill. The tank was used as the day tank for the kiln when it was fueled by #6 oil. The tank also was the receptacle for waste oil that was used for some time as a fuel. In May Dragon commenced operations to abandon the tank in place. The tank was cleaned by Clean Harbors. At that time about 10 cubic yards of contaminated soil was found, excavated and stockpiled. This soil was put through the Dragon Products cement kiln to disposal. The kiln is licensed to treat oil contaminated soil.

Clean Harbors had discovered that some of the material they had pumped out of the tank had high PCB content, as high as 2148 ppm. I arranged to meet with Paul Hunt of Dragon Products. They would arrange for additional testing on the soil surrounding the tank and additional tank sumps for possible PCB contamination. Eventually the high levels of PCB contamination were confirmed. I notified our TOSCA person, Nathan Thompson about this. He replied that he was leaving the job (to join Response) and that Scott Cyr would take his place. There were meetings with Dragon on 6/7 and 7/29. We came to consensus of what the Department expected of them. They would hire Woodard and Curran to do the work plan and Clean Harbors to do the clean up. I would still be project manager for DEP but Scott Cyr would set remediation goals as this was a TOSCA function.

It was determined that the contamination came from the old #6 oil hot oil system. The plant had a hot oil system as part of the original #6 oil storage system. The original oil used in the system was Thermisol-FR, high PCB content oil. The system was drained in the 1970's but not flushed. Residual amounts of Thermisol-FR contaminated the new oil and that is what was found in the existing hot oil system. Characterization and cleanup of the site occurred from June of 1993 until April of 1994. The site is now clean to the Departments satisfaction. The 20,000 gallon tank was eventually removed. Further details of this can be found in the central file room of the Bureau of Hazardous Materials and Solid Waste Control.

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Date (7//4/73)	, DEP SPILL # 17765-93
GENERATOR /) region (emil	nt (Dragion Products)
TRANSPORTER: Dragon	
REFERENCE: SHIPMENT OF OIL SPILL DEBRIS	
ON 3/19/93	Gehrlim OBSERVED THE
(date)	(DEP'represenative)
clean up of oil spill debns at Drugon (coment - day font
V	(location)
which resulted from over fulls	1.051
	(description of incident)
11/3	
This shipment consists of 5.00	yards
	(quantity)
and/or	drums of solid contaminated with
waste cel	
(contaminăn	
Solidin consist of laborate as appropriate)	
Solids consist of (check as appropriate) sand, gravel or soil.	
speedy-dri sorbent	
other	
	(descibe or lists)
Facility is (check One)	
Landfill Land Spreading Site	
- 「自動」 (記述:Asphalt Plant ・) (大学) (本語) - ・	
Asphalt Pug Mill Commontage Common Co	ient Kiln
7	(describe)
Tronus John	
Signature- DEP Representative	
Tank I Thun	
Signature-Facility Répresentative	等人的特殊系统数据 5 mm = 1
white - DEP Representative Pink - Generator	Canary - Transporter Canary - Transporter Canary - Canary - Receiving facility



LEGEND

Population Center

State Route

- Geo Feature
- ♦ Town, Small City
- ♠ Park
- US Highway
- ____ Street, Road
- _____ Major Street/Road
- _____ State Route
- _____ US Highway
- +++ Railroad
- _____ River
- Open Water

Scale 1:31,250 (at center)

2000 Feet

Utility (powerline)

1000 Meters

A-266-93 Dragon Products Mag 14.00 Fri Dec 30 15:36:51 1994

STATE OF MAINE



DEPARTMENT OF ENVIRONMENTAL PROTECTION

JOHN R. McKERNAN, JR. GOVERNOR

DEBRAH J. RICHARD
ACTING COMMISSIONER

November 29, 1994

Mr. Steve Wallace Dragon Products P. O. Box 191 Thomaston, Maine 04861

Dear Steve:

The Maine Department of Environmental Protection (MEDEP) acknowledges that PCB remedial activities carried out at Dragon, Thomaston from 7/23/93 to 4/19/94 are complete and have been carried out to the satisfaction of the Department.

Initial contact between Dragon and the Department was during a tank removal. The tank in question was the 20,000 gallon day tank that Dragon Products had previously used to hold #6 oil and specification waste oil to fuel the cement kiln. During the cleaning of the tank it was discovered by Clean Harbors personnel that some of the oil had high concentrations of PCB's. Notification was made to the Department. Frank Gehrling, MEDEP Division of Response Services as a follow on to the tank removal initiated discussions with Dragon and the MEDEP TSCA program.

The MEDEP TSCA program established an outreach program with Dragon to conduct primary contractor oversight and review of the work plan prepared and submitted by Woodard and Curran. Initial contact by Dragon was established with Frank Gehrling, Division of Response Services (DRS) MEDEP and Nathan Thompson, former MEDEP TSCA (ME-TSCA) PCB compliance inspector.

All initial reviews and approval were conducted by Frank Gehrling and Scott Cyr. ME-TSCA received clarification and interpretive information regarding statutory requirements of 40 CFR §761 from EPA Region-I. EPA was kept informed of all TSCA remedial activities at Dragon throughout the process.

PCB contamination was determined to originate from the old heat transfer oil "Therminol FR" system. The system had leaked and caused contamination of the waste oil originating from the kiln day tank UST to adjacent structures including the vault/pump house, piping trench, heat transfer system and tex-heater room. With the exception of a small amount Serving Maine People & Protecting Their Environment

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(2.9 ppm) found in the excavated soils during the UST removal the PCB contamination was contained within these structures.

The oil contaminated soils (OCS) generated from the DEP supervised clean-up were authorized to be processed in Dragon's kiln. See Solid Waste Order (#S-20851-WK-A-N).

It is the opinion of the Department that the work plan incorporated all the applicable standards from 40 CFR §761 in order to meet TSCA approvals. The remedial plan and the data are on file in the central file at MEDEP, Ray Building, Augusta.

Sincerely yours,

Frank Gehrling

Division of Response Services Bureau of Hazardous Materials and Solid Waste Control