

STATEMENT OF BASIS

Easton Utilities Commission Plant No. 1 Easton, Maryland

EPA ID No. MDD 980555668

I. Introduction

This Statement of Basis is for the Easton Utilities Commission, Plant No. 1 facility, located in Easton, Maryland (hereafter called "facility"). After a thorough site inspection of the facility, and an evaluation of past remediation practices, the Environmental Protection Agency (EPA) believes that no further corrective action is necessary at the facility at this time. The purpose of this document is to describe past activities at the facility and to solicit public comment on EPA's tentative decision.

Historically, the facility was listed as a high priority facility in EPA's RCRA Cleanup Program. This program is generally known as "Corrective Action" and is designed to ensure that facilities have investigated and cleaned up any releases of hazardous waste or constituents that may have occurred at their property. EPA believes that public participation is an important part of its final cleanup determination.

II. Facility Background

The facility is an electric power plant which occupies approximately 11 acres within the city limits of the City of Easton in Talbot County, Maryland. The facility is located at 219 North Washington Street; 1 mile west of Route 322. The facility is bordered on the east by Washington Street. The southern boundary of the facility is surrounded by residential housing on Bay Street and a dry cleaners. The facility is bounded on the west by a bank and an open lot. A commercial building complex is located on the northern boundary of the facility on Marlboro Road.

The facility is comprised of 10 powered alternating generators that are fueled by No. 2 or a combination of No. 2 fuel oil and natural gas. The facility serves electricity to the City of Easton and the surrounding area. The facility serves approximately 9,000 customers in a service area of approximately 52 square miles in and around (mostly to the north) the Easton, Maryland area.

The Easton Utilities Commission filed a Part A RCRA Application on November 14, 1980 and claims to have never operated as a treatment, storage or disposal (TSD) facility in accordance with the federal RCRA Program. The Easton Utilities Commission operates as a small quantity generator under the RCRA Program. Easton Utilities Commission registered on April 21, 1997 under the State of Maryland Underground Storage Tank Program and was issued a Permit # 0000515. Easton Utilities Commission also has three operating permits: a State of Maryland water discharge Permit # 0502 (EPA NPDES Permit # MD 0022772) which was effective on May

31, 2001 and expires on May 31, 2006; a State of Maryland Oil Operations Permit #99-OP-0908, effective August 9, 1999, expiration August 9, 2004; and a State of Maryland Air Permit #24-041-00029 which became effective on February 15, 2000 and expires on October 31, 2004.

III. Summary of Facility Areas

In June 2002, an environmental indicator inspection was conducted at the facility by the U. S. Environmental Protection Agency (EPA) RCRA Corrective Action Program. The solid waste management units (SWMU) and areas of concern listed in Table 1 were identified at the facility. Figure 1 shows the location of these SWMUs/AOC within the facility.

Table 1

SWMU/ AOC	Description	Waste Managed
1	Six No. 2 fuel oil generators & four dual No. 2 fuel oil and natural gas generators	Lubrication oil, fuel, parts cleaning solvent (previously used Salvol; containing trichloroethylene, tetrachloroethylene and mineral spirits as parts cleaner until 1989) and exhaust
2	Maintenance garage	Safety Kleen parts cleaner (previously used Salvol; containing trichloroethylene, tetrachloroethylene and mineral spirits as parts cleaner until 1989), waste fuel (diesel and gasoline) and lubricating oil
3	Drum storage area	Lubricating oil
4	Cooling tower maintenance building	Fifty-five gallon drum of sulfuric acid and algicide (toxin used to kill algae, bacteria and other living organisms that cause fouling in cooling water system)
5	Polychlorinated biphenyls (PCBs) transformer storage area	stored transformer oil containing PCBs
6	Basements/Sumps	potential leaks/seeps of lubricating oil and parts cleaning solvent that are not captured by absorbents or rags are directed to the basement sumps through drains and gutters

IV. Release History

In conjunction with the environmental inspection conducted in June 2002, EPA, in coordination with the Maryland Department of Environment (MDE) conducted a file review to identify possible releases to the environment. Based on the findings of the environmental inspection and the file review, the releases described below were identified. For more information regarding these releases, reference the administrative record for this facility at the locations listed in Section V below.

Cooling Tower Maintenance Building

Sulfuric acid was previously used to adjust the pH of the cooling tower water prior to adding the biological fouling agent, algicide. The algicide operated efficiently within a pH range of approximately 7.0 - 8.0. The sulfuric acid was fed through tubes leading from a fifty-five gallon drum to the cooling water. Waste from the cleaning of this sulfuric acid drum process was recycled to the cooling water system. Spills from this process area were contained in the building by the floor slab which creates a secondary containment. The concrete floor area surrounding the fifty-five gallon drum of sulfuric acid was stained with corrosion. The stained concrete floor has since been cleaned. Since 1989 the facility uses a algicide that does not require pH adjustment prior to its addition to the cooling water. Therefore, sulfuric acid also has not been used since 1989 at the facility. (See Figure 1- Area 7)

Aboveground and Underground Storage Tanks

Twenty-Five Thousand (25,000)-Gallon Aboveground Tank (AST) In early 1973, a release fuel oil occurred from a crack in the piping for the 25,000-gallon former fuel oil tank. The release migrated to the Tanyard Branch via the drain valve in the secondary containment tank area accidentally left open. It is reported in the Spill Prevention Control and Countermeasure Plan that the release was minor in nature. The tank was removed from the facility in 1996. The area is currently a paved parking lot. (See Figure 1 - formerly located in area 1)

Facility Fuel Piping Supply Three releases occurred from the 300,000 gallon aboveground storage tank buried piping that supplies fuel to the Facility. The first release occurred on December 10, 1984. A backhoe nicked the buried coated pipe causing 25-gallons of #2 fuel to leak into the north fork of the Tanyard Branch of the Tred Avon River. The pipe was repaired, re-coated and cathodic protection was installed. The second release was reported to have been discovered on June 7, 1985. Less than approximately 2-gallons of fuel oil entered the north fork of the Tanyard Branch of the Tred Avon River from a storm drain leading from an abandoned fuel line on the southwest end of the property. The release was remediated with sorbent pads to prevent flow from the storm drain to the north fork of the Tanyard Branch of the Tred Avon River. The oil was cleaned up and the pipe was plugged. This pipe and all other piping in the facility were later cleaned of residual oil. On March 31, 1998, the last release was reported to have occurred. Less than 1-gallon of fuel oil entered the stream from a coupling in a buried fuel line. The release was remediated and the pipe line was reinstalled aboveground. As a precautionary measure, the facility now installs all fuel piping above ground or cathodically protects the lines if installed below ground. (See Figure 1 - area 1)

EPA believes that the facility has adequately addressed all of these releases and there are no other areas that require investigation or remediation from past releases to the environment. Based on the review of all available resources and a thorough site inspection, EPA is proposing that no further corrective action be required at this time at the Easton Utilities Commission Plant No. 1 facility located in Easton, Maryland.

In summary, there are four media through which humans could be exposed to potential releases from units at this facility:

Air: There are no documented observed, un-permitted, or on-going air releases at the facility from any of the units.

Groundwater: Currently there is no known or reasonably suspected contamination to the groundwater from any of the units at the facility.

Surface Water: Currently, there is no known or reasonably suspected contamination to the surface water.

Soil: Currently there is no known or reasonably suspected contamination to the soil from any of the units at the facility.

V. Public Participation

EPA is requesting comments from the public on its proposal that no corrective action will be required at this facility. The public comment period will be publicly noticed in a local newspaper from February 14, 2003 to March 17, 2003. Written Comments may be sent to the EPA address listed below, and all commentors will receive a copy of the final decision and a copy of the response to comments.

A public meeting will be held upon request. Requests for a public meeting should be made to Ms. Linda Holden of the EPA Regional Office at the address below.

The Administrative Record contains all information considered by EPA. The Administrative Record is available at the following locations:

U. S. Environmental Protection Agency - Region III
1650 Arch Street - 3WC23
Philadelphia, PA 19103-2029
Contact: Ms. Linda Holden
Voice: (215) 814-3428
Fax: (215) 814 3113
Hours: Mon-Fri 8:00 A.M. - 4:30 P.M.
E-mail: holden.linda@epa.gov

Talbot County Public Library
100 West Dover Street
Easton, MD 21601

(410) 822-1626

Hours: Monday/Thursday 9 A.M. - 9 P.M.

Tuesday/Wednesday 9A.M - 6 P.M.

Friday/Saturday 9 A.M. -5 P.M.

Contact: Jane McFarlane

Following the public comment period from February 14, 2003 to March 17, 2003, EPA will prepare a final decision which will address all written comments and any substantive comments presented verbally at a public meeting. This final decision will be incorporated into the Administrative Record. If the comments are such that significant changes are made to the proposal that no further action is needed at this time at this facility, EPA will seek public comments on the revised proposal.