

Department of Environmental Protection		NPDES Compliance Inspection Report				Water Management Program									
Section A: National Data System Coding															
Transaction Code		NPDES		Yr./Mo./DAY		Inspection Type	Inspector	Fac. Type							
1	R	2	5	3	P A 0 0 1 3 6 4 1	11	12	9 9 0 8 2 5	17	18	R	19	S	20	
Section B: Facility Data															
Name and Location of Facility Inspection						Entry Time/Date	Permit Effective Date								
Damascus Bishop Tube						8-25-99 1:00p									
Malin Rd.						Exit Time/Date	Permit Expiration Date								
Municipality						8-25-99 1:20p									
East Whiteland				County		Chester									
Name, Address of Responsible Official						Title									
Brent Ward						President									
Damascus Bishop Tube						Telephone	Contacted								
795 Reynolds Ind. PK Rd.							Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>								
Greenville PA 16125															
Section C: Areas Evaluated During Inspection															
(S = Satisfactory, I = Improvement Needed, U = Unsatisfactory, D = Does Not Apply, Blank = Not Evaluated)															
<input type="checkbox"/> Permit Verification		<input type="checkbox"/> Flow Measurement		<input type="checkbox"/> Effluent/Receiving Waters											
<input type="checkbox"/> Compliance Schedule		<input type="checkbox"/> Laboratory/QA		<input type="checkbox"/> Operation/Maintenance											
<input type="checkbox"/> Records/Reports		<input type="checkbox"/> Self-Monitoring Program		<input type="checkbox"/> Pretreatment											
S Other (Specify):		facility shutdown													
Section D: Summary of Violations/Recommendations/Comments (Attach additional sheets if necessary)															
<del>Violations</del>															
Comments - The outfall has been sealed. Floor drains have been sealed. The NPDES permit may now be cancelled															
Compliance Assistance Provided <input type="checkbox"/>															
Pollution Prevention Activity <input type="checkbox"/>															
Inspector Name		Inspector Signature		Title		Date									
Jo Ann Dolchak		Jo Ann Dolchak <i>ASB</i>		WQS		8-25-99									
Name of Person Interviewed		Signature of Person Interviewed		Title		Telephone									
		<i>[Signature]</i>				832-1108									
This document is official notification that a representative of the Department of Environmental Protection inspected the above facility. The findings of this inspection are shown above and on any attached pages.															
Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses of the discharge and review of Department records. Notification will be forthcoming, if such violations are noted.															

Department of Environmental Resources	NPDES Compliance Inspection Report	Water Management Program
Additional Comments		
<p>The floor drains in building 5 have been sealed with concrete. The process wastewater line in plant 8 has been cut (a section of the PVC pipe has been removed near the pump pit). The electric supply to the pump has been disconnected. The effluent line has been sealed with concrete at the point where it exists the building.</p>		
Permit No.: PA 0013641 Date: 8-25-99		

Department of Environmental Protection		NPDES Compliance Inspection Report				Water Management Program																					
Section A: National Data System Coding																											
Transaction Code		NPDES		Yr./Mo./DAY		Inspection Type	Inspector	Fac. Type																			
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20								
	R	S		P	A	0	0	1	3	6	4	1				9	9	0	8	1	0		R		S		
Section B: Facility Data																											
Name and Location of Facility Inspection						Entry Time/Date		Permit Effective Date																			
Damascus Bishop Tube						8-10-99 9:15 A																					
Municipality						Exit Time/Date		Permit Expiration Date																			
East Whiteland						8-10-99 10:10																					
County						Title																					
Chester						President																					
Name, Address of Responsible Official						Telephone		Contacted																			
Brent Ward								Yes <input type="checkbox"/> No <input type="checkbox"/>																			
Damascus Bishop Tube																											
795 Reynolds Ind PK Rd. Greenville PA 16125																											
Section C: Areas Evaluated During Inspection																											
(S = Satisfactory, I = Improvement Needed, U = Unsatisfactory, D = Does Not Apply, Blank = Not Evaluated)																											
___ Permit Verification		___ Flow Measurement		___ Effluent/Receiving Waters																							
___ Compliance Schedule		___ Laboratory/QA		___ Operation/Maintenance																							
___ Records/Reports		___ Self-Monitoring Program		___ Pretreatment																							
S		Other (Specify):		Plant closure																							
Section D: Summary of Violations/Recommendations/Comments (Attach additional sheets if necessary)																											
<del>VIOLATIONS</del>																											
Comments - The effluent line + floor drains in Plant 5 need to be permanently sealed, so the NPDES permit may be cancelled																											
Compliance Assistance Provided <input type="checkbox"/>																											
Pollution Prevention Activity <input type="checkbox"/>																											
Inspector Name		Inspector Signature		Title		Date																					
JoAnn Dofchak		JoAnn Dofchak		WQS		8-10-99																					
Name of Person Interviewed		Signature of Person Interviewed		Title		Telephone																					
Dofchak		Dofchak				610 832-6108																					
<p>This document is official notification that a representative of the Department of Environmental Protection inspected the above facility. The findings of this inspection are shown above and on any attached pages.</p> <p>Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses of the discharge and review of Department records. Notification will be forthcoming, if such violations are noted.</p>																											

Department of  
Environmental Resources

## NPDES Compliance Inspection Report

Water  
Management Program

## Additional Comments

This facility is now closed. All manufacturing equipment and related equipment has been removed. The buildings are empty. The process wastewater line to the NPDES outfall is still in place. This begins at a wastewater pump pit in Plant 8. The pump is still in place, so is the PVC line through the building and ~~out~~ to the outfall. This needs to be permanently sealed, preferably at the point where it exits the building or enters the in-line manhole. There are also 4 floor drains in building 5 that need to be permanently sealed.

Permit No.: PA 0013641

Date: 8-10-99

Department of Environmental Resources		NPDES Compliance Inspection Report				Bureau of Water Quality Management	
<b>Section A: National Data System Coding</b>							
Transaction Code	NPDES	Yr/Mo/Day		Inspection Type	Inspector	Fac Type	
1 N 2 5	3 PA 00, 3641	11	12 46 11 22	17	18 R	19 S	20
<b>Section B: Facility Data</b>							
Name and Location of Facility, inspected				Entry Time/Date	Permit Effective Date		
Damasceus Bishop Tube Company IAC				11-22-96	2-23-95		
Rt. 30 + Main Rd				Exit Time/Date	Permit Expiration Date		
Municipality				County		7-29-99	
East Whiteland				Chester			
Name, Address of Responsible Official				Title			
Gianclaudio Conti				Engineer/Plant Mgr			
P.O. Box 1189				Telephone			
Frazer PA 19355				647-3450		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
<b>Section C: Areas Evaluated During Inspection:</b>							
(S = Satisfactory, I = Improvement Needed, U = Unsatisfactory, D = Does Not Apply, Blank = Not Evaluated)							
___ Permit Verification		___ Flow Measurement		___ Effluent/Receiving Waters			
___ Compliance Schedule		___ Laboratory/QA		___ Operation/Maintenance			
I Records/Reports		U Self-Monitoring Program		___ Pretreatment			
___ Other (Specify): _____							
<b>Section D: Summary of Violations/Recommendations/Comments (Attach additional sheets if necessary)</b>							
VIOLATIONS:							
The DEP has not received DMRs for 001 since 4/96.							
We also have not received DMRs for stormwater							
outfall 002 since permit issuance							
- Violations of NPDES permit + PA Clean Streams Law							
5/96 thru 10/96 DMRs were given to me at this inspection							
001 does not receive flow - all is recycled now							
BCM, according to plant personnel, had been contracted to							
sample 002 for NPDES permit requirements							
Inspector Name		Inspector Signature		Title		Date	
JoAnn Dolchak		JoAnn Dolchak		WQS		11/22/96	
Name of Person Interviewed		Signature of Person Interviewed		Title		Date	
David S Lewis Sr		David Lewis Sr				610 632 6188	
<p>This document is official notification that a representative of the Department of Environmental Resources, Bureau of Water Quality Management, inspected the above facility. The findings of this inspection are shown above and on any attached pages.</p> <p>Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses of the discharge and review of Department records. Notification will be forthcoming, if such violations are noted.</p>							



Pennsylvania Department of Environmental Protection

Lee Park, Suite 6010  
555 North Lane  
Conshohocken, PA 19428  
July 8, 1999

Southeast Regional Office

610-832-6130  
Fax 610-832-6133

**NOTICE OF VIOLATION**

Mr. Kent Lulewich  
Damascus-Bishop Tube Company, Inc.  
Route 30 and Malin Road  
PO Box 1189  
Frazer, PA 19355

Re: Damascus Bishop Tube  
NPDES Permit No. PA0013641  
East Whiteland Township  
Chester County

Dear Mr. Lulewich:

This is to advise you that you are in violation of the Monitoring and Reporting Section of your permit which requires the periodic submission of Discharge Monitoring Reports.

According to our records, we have not received your Discharge Monitoring Reports for the reporting periods of January 1999, February 1999, and April 1999. The reports must be postmarked no later than the twenty-eighth (28th) day of the month following the completed reporting period.

Such condition is in violation of your permit No. PA0013641. Consequently, you are in violation of the Pennsylvania Clean Streams Law, the Act of June 22, 1937, P.L. 1987, as amended, and subject to the penalties provided therein.

Therefore, please submit the required reports within ten (10) days of receipt of this letter. Failure to comply with this requirement may necessitate enforcement action.

This letter does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law arising prior to or after the issuance of this letter or the conditions upon which the letter is based. This letter shall not be construed so as to waive or impair any rights of the Department of Environmental Protection, heretofore or hereafter existing.



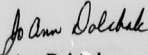
Mr. Kent Lulewich

- 2 -

July 8, 1999

If you have any questions, please contact me at 610-832-6131.

Sincerely,

  
JoAnn Dolch  
Water Quality Specialist  
Water Management

cc: East Whiteland Township  
Compliance and Monitoring Section  
Re 30 (SMC99)188-4



Pennsylvania Department of Environmental Protection

Lee Park, Suite 6010  
555 North Lane  
Conshohocken, PA 19428  
December 5, 1996

Southeast Regional Office

610-832-6130  
Fax 610-832-6133

NOTICE OF VIOLATION

Damascus-Bishop Tube Company Inc.  
Attn: Gianclaudio Conti, Engineer/Plant Manager  
P.O. Box 1189  
Frazier, PA 19355

Re: Permit No. PA0013641  
WQ/IW  
East Whiteland Township  
Chester County

Dear Mr. Conti:

This is to confirm the results of our inspection conducted on November 22, 1996, and a review of our records which revealed you have failed to submit Discharge Monitoring Reports for your NPDES outfall 002 since permit issuance. Discharge Monitoring Reports for outfall 001 had not been submitted for May 1996 through October 1996 until the time of our inspection. These reports are due within 28 days following the end of each reporting period.

Such conditions are in violation of your permit No. PA0013641. Consequently, you are in violation of the Pennsylvania Clean Streams Law, the Act of June 22, 1937, P.L. 1987, as amended, and subject to the penalties provided therein.

Therefore, please submit the missing reports within fifteen days from the date of this letter, if you have not already done so.

This letter does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law arising prior to or after the issuance of this letter or the conditions upon which the letter is based. This letter shall not be construed so as to waive or impair any rights of the Department of Environmental Protection, heretofore or hereafter existing.

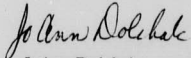




December 5, 1996

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

Sincerely,



JoAnn Dolchak  
Water Quality Specialist  
Water Management

cc: East Whiteland Township  
Compliance and Monitoring Section  
Re 30 (RN)337-6

Department of Environmental Resources	<h2 style="margin: 0;">NPDES Compliance Inspection Report</h2>	Bureau of Water Quality Management
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**Section A: National Data System Coding**

Transaction Code	NPDES	Yr/Mo/Day	Inspection Type	Inspector	Fac Type
1W 2S 3 PA 001364111		12/9/95 12:17	18R	19	20

**Section B: Facility Data**

Name and Location of Facility Inspected (Damascus) - Bishop Tube Company Inc.		Entry Time/Date 12:48 5-12-94	Permit Effective Date 3-20-89
Municipality Rt 30 + Malin Rd East Whiteland		Exit Time/Date 2:00 5-12-94	Permit Expiration Date 3-20-94
County Chester		(renewal received)	
Name, Address of Responsible Official Russel G. Levering (Plant Engineer/Buyer) P.O. Box 11 89 Frazer PA 19355		Title Craig Fuller, Treasurer c/o Corporate Planning Associates Inc 125 Stratford Ave Wayne Pa. 19087	Title Plant Engineer/Buyer Telephone 25 647-3450
		Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

**Section C: Areas Evaluated During Inspection**

(S = Satisfactory, I = Improvement Needed, U = Unsatisfactory, D = Does Not Apply, Blank = Not Evaluated)

<input type="checkbox"/> Permit Verification	<input type="checkbox"/> I Flow Measurement	<input type="checkbox"/> Effluent/Receiving Waters
<input type="checkbox"/> Compliance Schedule	<input type="checkbox"/> Laboratory/QA	<input type="checkbox"/> Operation/Maintenance
<input checked="" type="checkbox"/> I Records/Reports	<input checked="" type="checkbox"/> S Self-Monitoring Program	<input type="checkbox"/> Pretreatment
Other (Specify): _____		

**Section D: Summary of Violations/Recommendations/Comments (Attach additional sheets if necessary)**

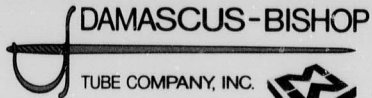
- DMR's have been submitted late - (they should be submitted within 28 days from the end of the reporting period)
- Flow measurement was omitted from some of the DMRs submitted recently
- NPDES permit + PA Clean Streams Law Violations

Inspector Name JoAnn Dolchak	Inspector Signature JoAnn Dolchak	Title WQS	Date 5-12-94
			Telephone 215 832-6130
Name of Person Interviewed RUSSELL G. LEVERING	Signature of Person Interviewed Russell G. Levering	Title PLANT ENGR.	Date 5/12/94
			Telephone

THIS DOCUMENT IS OFFICIAL NOTIFICATION THAT A REPRESENTATIVE OF THE DEPARTMENT OF ENVIRONMENTAL RESOURCES, BUREAU OF WATER QUALITY MANAGEMENT, INSPECTED THE ABOVE FACILITY. THE FINDINGS OF THIS INSPECTION ARE SHOWN ABOVE AND ON ANY ATTACHED PAGES.

ANY VIOLATIONS WHICH WERE UNCOVERED DURING THE INSPECTION ARE INDICATED. VIOLATIONS MAY ALSO BE DISCOVERED UPON EXAMINATION OF THE RESULTS OF LABORATORY ANALYSES OF THE DISCHARGE AND REVIEW OF DEPARTMENT RECORDS. NOTIFICATION WILL BE FORTHCOMING, IF SUCH VIOLATIONS ARE NOTED.

Department of Environmental Resources	<b>NPDES Compliance Inspection Report</b>	Bureau of Water Quality Management
<b>Additional Comments</b>		
<p>Discharge is <del>from</del> non-contact cooling water from a heat exchange system. Most water is recycled but some overflow creates the outfall. The outfall pipe in place now combines with stormwater before discharging to the stream.</p>		
<p>Plans are to change <sup>NPDES</sup> this with the permit renewal &amp; move the outfall about 80' downstream in a separate pipe.</p>		
<p>Flow through the outfall is intermittent - there's nothing discharging at this time - since ideally the system should be a 100% recycle.</p>		
<p>Flow quantity estimate is based on knowledge of equipment. There is no flow metering system or equipment running times to base this on.</p>		
<p>Fluoride should no longer be present since this was part of a pickling operation that no longer exists here. Some flow metering system should be considered for more accurate flow estimates &amp; to alert personnel when the <del>discharge</del> wastewater is discharging.</p>		
<p>BCM is revising the PPC plan. Log sheets are kept which indicate dates and readings for weekly sampling.</p>		
		Permit No.: PA 0013641
		Date: 5-12-94

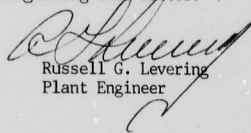


MEMO

This facility did not discharge any water from our operations in November, 1994 as is noted on the monthly report.

However, sometime early morning on Wednesday, 11/02/94, during non-working hours, a 2" pipe main seperated at a coupling dumping thousands of gallons of water direct from Suburban Water Company source onto our production area floor before it was discovered and valves turned off. Fourteen thousand four hundred (14,400) gallons of this water ran into the pump sump and was discharged through our monitoring meter to the NPDES 001 outfall at the creek.

I trust this memo is sufficient information regarding this matter. .

  
Russell G. Levering  
Plant Engineer

Complaint Tracking System  
Investigation Report  
Report Date: 03/23/1993

Complaint Id: 4056      Description: SUSPECTED CONTAMINATED SOIL IN  
REAR OF PROPERTY.  
Program: Waste Management Program  
Complaint Type: Residual Waste

Investigator Name: April Flipse  
Date Investigation Assigned: 01/08/1993      Date Investigated: 01/12/1993  
Investigation Type: Site Visit      Violation: No

Investigation Description:  
SITE VISIT W/S. BROWN, TANKS, & STEPHANIE WOOLRIDGE, CC CONSERVATION  
DISTRICT. SOILS FROM INDOOR FLOOR WORK, NO EVIDENCE OF CONTAMINATION.  
WE ASKED FOR SOILS TO BE REMOVED FROM THE EDGE OF THE CREEK, STORAGE  
CLOSER THAN 50 FT, DAMS & WATERWAYS REG.; 2/1/93 UPDATE: SITE CLEAN, PILES  
GONE.