



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
Four Penn Center – 1600 John F Kennedy Blvd
Philadelphia, Pennsylvania 19103-2852

Report Title: Geospatial Measurement of Air Pollution of Coopers Creek Chemical Corporation
Inspection Date(s): March 30, 2023
Regulatory Program(s): CAA Operating Permit, NSPS
Company Name: Coopers Creek Chemical Corporation
Facility Name: Coopers Creek Chemical Corporation
Facility Location: 844 River Rd
West Conshohocken, PA 19428
Latitude: 40.06354 **Longitude:** -75.271209
County/Parish: Montgomery County
AFS/Air-ICIS Number: PA000502
Permit Number: 46-00008
NAICS Code: 325194 **SIC:** 2865
Unique Project #: 3E23CA085A

Facility Representatives:	Point of Contact
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*Additional EPA inspectors identified in report body and on attached sign in sheet

State/Local Inspectors: *
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EPA Lead Inspector

Signature

Parmatma Adhikari

Date

Four Penn Center – 1600 John F Kennedy
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Supervisor

Signature

Kristen Hall

Date

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I. Introduction

The United States Environmental Protection Agency (EPA) conducted Geospatial Measurement of Air Pollution (GMAP) monitoring at Coopers Creek Chemical Corporation (Coopers Creek or Facility) to determine if elevated levels of detectable compounds were present. The Pennsylvania Department of Environmental Protection (PADEP) was notified of the inspection on March 15, 2023, via email. On March 29, 2023, EPA notified the Facility of the planned inspection, via phone.

A. Summary of the Facility

The Facility is located at 844 River Rd, West Conshohocken, PA 19428. The Facility produces coal tar, coal tar pitches, distillate oils and creosote for use in roofing and surface coating. Scott A. Morris (Vice President of the Facility) mentioned that Cooper Creek is a family-owned business, and it has been operating since 1938. The Facility employs about 30 full time employees and operating Monday to Friday (24 hour/day via three 8-hour shift).

The Facility received synthetic minor air Operating Permit (46-0008) from PADEP, issued on May 29, 2020.

The Facility is subject, or is potentially subject, to the following federal regulations:

- **40 CFR Part 60, Subpart K:** Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978
- **40 CFR Part 60, Subpart Ka:** Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984

B. Inspection Opening Conference

At 9:30 AM on March 30, 2023, EPA inspectors arrived at the Facility for GMAP monitoring and conducted a brief opening conference. Coopers Creek was represented by Scott A. Morris and Mark A. Morris (VPs of the Facility). Helen Morris, Colin Lauer and Karen Whittaker, of PADEP, were also present. EPA inspectors, Paul Arnold, Parmatma Adhikari, Philip Myers, Nichols Bobbs, Scott Yanos, Alex Everhart and Riley Burger presented their credentials and explained the purpose of the visit was to conduct mobile monitoring using Geospatial Measurement of Air Pollution. EPA inspector Nick Bobbs explained that the GMAP vehicle has the capability to monitor Hydrogen Sulfide (H₂S), Volatile Organic Compounds (VOCs), Methane (CH₄), Sulfur Dioxide (SO₂) and Benzene (C₆H₆).

II. Site Activity/Process Description

The Facility processes crude coal tar to manufacture coal tar pitches, distillate oils, and creosote used in roofing and coating. The Facility has multiple stills that separate water, naphthalene, coal tar distillate oils, and coal tar pitch from crude coal tar.

The opening conference concluded at 10:30 AM.

III. Observations

EPA inspectors were led on a drive through the Facility at 10:30 AM by Scott A. Morris. At 10:30 AM, EPA initiated GMAP monitoring. Inspectors from EPA as well as Inspectors from PADEP were present during GMAP monitoring.

The EPA GMAP vehicle was lead through various interior roads of the Facility. EPA observed GMAP readings which are represented in Table 1. A designation of “elevated” means elevated concentrations of the listed pollutant were measured above background levels using GMAP. Actual numeric concentration readings observed during the monitoring event were not yet verified at the time of this report, but can be shared, with Facility, once the data becomes verified and available.

TABLE 1					
Time	VOC (ppb)	Benzene (ppb)	H2S (ppb)	SO ₂ (ppb)	Approximate Location
9:50 am		Elevated			Tank # 36
9:50 am		Elevated			Tank # 34
10:05 am	Elevated	Elevated			Tank # 31
10:15 am	Elevated	Elevated			Near Tank # 32, 36 and 37
10:57 am	Elevated	Elevated			Near Tank # 32, 36 and 37

The GMAP monitoring concluded at 11:12 am.

IV. Closing Conference

EPA inspectors, Scott A. Morris, and Mark A. Morris (VPs of the Facility), Helen Morris, Colin Lauer and Karen Whittaker, of PADEP, had a brief closing conference to ask additional questions and discuss observations. The EPA inspectors noted that the investigation is on-going, and any areas of concern identified in the final reports do not necessarily reflect a violation or deviation, rather, they are areas that will require further investigation. EPA also noted that they would issue an inspection report within in 60 days, with a copy to the State. Simultaneously, EPA will perform a detailed review of records and may have additional questions. The inspection concluded at 11:25 am.

The following have been identified as *potential* issues during the inspection. These are issues that require either further investigation by EPA, or additional information or explanation by Coopers Creek.

- Elevated benzene emission near Tank # 31, 32, 36 and 37
- Elevated VOC emission near Tank # 32, 34, 36 and 37

V. List of Attachments

Attachment 1: Opening Conference sign in sheet.

Coopers Creek

3/30/23

NAME	ORG	EMAIL
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