



UNITED STATES

ENVIRONMENTAL PROTECTION AGENCY

REGION III

STATEMENT OF BASIS

STANDARD STEEL SPECIALTY COMPANY

BEAVER FALLS, PENNSYLVANIA

EPA ID NO. PAD004329074

I. Introduction

The United States Environmental Protection Agency (EPA) has prepared this Statement of Basis (SB) for the Standard Steel Specialty facility located at Jamison Street and 37th Street Extension, Beaver Falls PA 15010 (Facility). EPA's review of available information indicates that there are no unaddressed releases of hazardous waste or hazardous constituents from the Facility. Based on that assessment, our proposed decision is that no further investigation or cleanup is required. EPA has determined that its proposed decision is protective of human health and the environment and that no further corrective action or land use controls are necessary at this time. This SB highlights key information relied upon by EPA in making its proposed decision.

The Facility is subject to EPA's Corrective Action Program under the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act (RCRA) of 1976, and the Hazardous and Solid Waste Amendments (HSWA) of 1984, 42 U.S.C. §§ 6901 et seq. (Corrective Action Program). The Corrective Action program is designed to ensure that certain facilities subject to RCRA have investigated and cleaned up any releases of hazardous waste and hazardous constituents that have occurred at their property. The Commonwealth of Pennsylvania (Commonwealth) is not authorized for the Corrective Action Program under Section 3006 of RCRA. Therefore, EPA retains primary authority in the Commonwealth for the Corrective Action Program.

The Administrative Record (AR) for the Facility contains all documents, including data and quality assurance information, on which EPA's proposed decision is based. See Section V, Public Participation, for information on how you may review the AR.

II. Facility Background

The Facility is located at the intersection of Jamison Street and 37th Street Extension in Beaver Falls, Beaver County, Pennsylvania. The Facility is surrounded by mixed commercial and residential development and covers approximately 5 acres.

Standard Steel Specialty has been in operation at this location since 1925. Ownership of the property prior to 1925 is unknown. Since that time, the Facility has manufactured gear racks, machine keys, woodruff keys, taper pins, elevator guide rails, and other specialty machined steel products. The production of elevator guide rails and the associated painting operations were phased out in the early 1990s.

The Facility submitted their Part A Hazardous Waste Permit Application in 1981 for the tank storage of toxicity characteristic waste; however, subsequent testing in 1983 indicated that this waste oil was non-hazardous. Therefore, the Pennsylvania Department of Environmental Protection (PADEP) approved a withdrawal of interim status in 1983, and EPA later agreed in 1984 that the Facility was neither a generator of hazardous waste nor a hazardous waste treatment, storage, or disposal facility. Since this time, occasional instances of hazardous waste generation have occurred, primarily due to the use of mineral spirits for cleaning machinery. As a result, the Facility is currently a Conditionally Exempt Small Quantity Generator of hazardous waste.

III. Summary of Environmental History

Remedial efforts at the Facility began in 1968 when a pile of steel cuttings and chips had accumulated on the ground. Cutting oil (nonhazardous) from this pile was reportedly entering a roadside ditch in violation of Pennsylvania's Clean Streams Law. In response to the notice of violation from the Department of Health, the Facility covered the pile with reinforced plastic sheets and planned to move the pile onto a concrete slab. During this process, the Facility discovered a vent pipe to a 10,000-gallon underground storage tank (UST) that had been abandoned in 1948 and still contained 3,500 gallons of oil. The UST was then assumed to be the source of contamination. The Facility planned to pump out the remaining oil and remove the tank and surrounding soil. By 1972 the chip pile had not yet been moved, but the oily discharge to the ditch had ceased, suggesting that the remediation of the UST was completed prior to 1972. The chip pile is no longer present at the Facility, but was believed to have been located near the present-day location of the roll-offs, which perform a similar function of storage of steel cuttings and chips for eventual disposal. Although no records have been found to confirm the remediation and removal of the UST, during the March 2012 EPA visit to the Facility, Facility representatives stated that they believe the UST was removed from the Facility under the supervision of the Department of Health, and that the former location of the UST

In 1980, PADEP responded to two separate complaints of oil in Walnut Bottom Run. In both instances, the oil was traced to the recirculation sump under the loading dock at the Facility. The sump was moved away from any sewers to prevent a recurrence. This sump was used in the manufacture of elevator guide rails; once guide rails were phased out in the early 1990s, this sump was removed from the Facility.

A 1989 PADEP General Inspection Form indicated that an investigation and cleanup were in progress for cutting oil discharging from a pipe into Walnut Bottom Run. The Facility responded to this release by installing a dead-end manhole to prevent further release of cutting oil into the pipe discharging into Walnut Bottom Run. This discharge was apparently from planing machines used in the manufacture of elevator guide rails, which were phased out in the early 1990s. The planing machines have since been removed from the Facility; therefore, there is no ongoing threat of release from this operation.

A Preliminary Assessment was conducted in August 1990 at the Facility. The assessment identified five non-hazardous waste management areas, two of which were of note. The empty drum storage area contained approximately 50 empty 55-gallon steel drums that were in various states of decay and had apparently been stored in the area for a long time. A small oil spill approximately three feet in diameter was also observed in the middle of this area. The dumpster area included two dumpsters used to collect scrap metals that were leaking oils. The leaking oil drained into an open grate that flowed into a drainage pool that flows southwardly into Walnut Bottom Run. The drainage pool and its sediment were visibly contaminated with this leaking oil at the time of the assessment, and two booms had been placed in the pool to absorb and contain the oil. More recent information on these areas is included in the discussion of the Environmental Indicator inspection below.

Discharges resulting from the overflow of the vibratory system sump occurred in 1990 and 1993. After the initial release, the Facility discontinued use of the sump, filled it with concrete, and replaced the system with a self-contained zero-discharge vibratory system. However, a malfunction in the recycle system caused a milky-white (aluminum oxide) discharge that was intercepted by a floor drain which ultimately discharged to Walnut Bottom Run. As a

result, the floor drain was plugged to prevent further discharge. Inspections in 1994 and 1995 indicated that no wastewater was being discharged from the vibratory system, and effluent from the discharge pipe to Walnut Bottom Run appeared clear.

A single-walled steel 6,000-gallon waste oil underground storage tank (UST) was removed from the Facility in 1991. Upon removal, hydrocarbon vapors and stained soil were detected. Contaminated soil was removed from the excavation to an average depth of twelve feet below ground surface before PADEP gave approval to backfill the excavation. Groundwater was not encountered during the excavation and remediation activities.

An Environmental Indicator inspection was conducted at the Facility in July 2003. The five non-hazardous waste management areas described in the Preliminary Assessment were reassessed as part of the inspection. Four of the five areas were closed and no longer operational. No drums were stored in the former empty drum storage area, and no evidence of oil spills was observed during the inspection. The dumpster (or roll-off) area is still active and has been improved in several ways to reduce the amount of oil leaking from the dumpsters. A shed roof was installed over the dumpsters to prevent stormwater from carrying oil from the area. Scrap metal chips are spun to remove as much oil as possible before being placed in the dumpsters. Finally, booms are in place around the dumpsters to prevent oil from migrating beyond the area. At the time of the inspection, the drainage pool downgradient of the dumpster area no longer contained an oily sheen or booms.

EPA visited the Facility in March 2012 to assess the current conditions at the Facility. No evidence of spills or releases was observed during the visit, and the drainage pool and Walnut Bottom Run appeared free of any oil impacts. No leakage from the dumpster area was observed, and booms surrounded the dumpsters as an added protective measure. As a result of this visit, EPA has determined that there are no remaining sources of hazardous contamination, past instances of releases have been adequately addressed and remediated, and the potential for further releases has been minimized.

IV. Environmental Indicators

EPA sets national goals to measure progress toward meeting the nation's major environmental goals. For Corrective Action, EPA evaluates two key environmental indicators for each facility: (1) current human exposures under control and (2) migration of contaminated groundwater under control. The EPA has determined that the Facility met these indicators on April 26, 2012.

V. Public Participation

Before EPA makes a final decision on its proposal for the Facility, the public may participate in the remedy selection process by reviewing this SB and documents contained in the Administrative Record (AR) for the Facility. The AR contains all information considered by EPA in reaching this proposed decision. It is available for public review during normal business hours at:

U.S. EPA Region III
1650 Arch Street
Philadelphia, PA 19103

Contact: Griff Miller
Phone: (215) 814-3407
Fax: (215) 814-3113
Email: miller.griff@epa.gov

Interested parties are encouraged to review the AR and comment on EPA's proposed decision. The public comment period will last thirty (30) calendar days from the date that notice is published in a local newspaper. You may submit comments by mail, fax, or e-mail to Mr. Miller. EPA will hold a public meeting to discuss this proposed decision upon request. Requests for a public meeting should be made to Mr. Miller.

EPA will respond to all relevant comments received during the comment period. If EPA determines that new information warrant a modification to the proposed decision, EPA will modify the proposed decision or select other alternatives based on such new information and/or public comments. EPA will announce its final decision and explain the rationale for any changes in a document entitled the Final Decision and Response to Comments (FDRTC). All persons who comment on this proposed decision will receive a copy of the FDRTC. Others may obtain a copy by contacting Mr. Miller at the address listed above.

Date:

Abraham Ferdas, Director
Land and Chemicals Division
US EPA, Region III