



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY

REGION III

STATEMENT OF BASIS

PTC ALLIANCE CORPORATION
(Formerly Pittsburgh Tube Company)

JANE LEW, WEST VIRGINIA

EPA ID NO. WVD 060 692 126

JULY 22, 2009

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I. Introduction

A. Facility Name

The United States Environmental Protection Agency (EPA) has prepared this Statement of Basis (SB) for the PTC Alliance Corporation – Jane Lew Division (formerly Pittsburgh Tube Company) located at 533 Industrial Park Road, Jane Lew, West Virginia (hereinafter referred to as the Facility).

The Facility is subject to the 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. Sections 6901 to 6992k. 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.

Information on the Corrective Action program, as well as a fact sheet for the Facility can be found by navigating <http://www.epa.gov/reg3wcmd/correctiveaction.htm>.

B. Proposed Decision

This SB explains EPA's proposed decision that Corrective Action is complete and no land use controls are required for the Facility. EPA's proposed decision is based on a review of EPA and West Virginia Department of Environmental Protection (WVDEP) files regarding the environmental history of the Facility. Based on this review, EPA has concluded that there are no current or unaddressed releases of hazardous waste or hazardous constituents from the Facility.

C. Importance of Public Input

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 the complete set of reports that document Facility conditions, including a map of the Facility, in support of EPA's proposed decision. EPA encourages anyone interested to review the AR. The AR is available for public review at the WVDEP office, the address of which is provided in Section V, below.

EPA will address all significant comments received during the public comment period. If EPA determines that new information or public comments 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 approve its final decision in a document entitled the Final Decision and Response to Comments (FDRTC).

II. Facility Background

The Facility is located at 533 Industrial Park Road, Jane Lew, Lewis County, West Virginia. The 10.9 acre facility is bordered by Composite Pool Corporation to the North, Hackers Creek to the South East, County Route 7/8 to the West, and World Wide Equipment/Kenworth to the South.

PTC Alliance - Jane Lew Division was built in 1974 as part of the Pittsburgh Tube Company and began its operations in 1976. In 2001, Pittsburgh Tube Company merged with Alliance Midwest Tubular Products and formed PTC Alliance. The Facility is currently idle.

During operations, the Facility would receive steel tubes from other PTC Alliance facilities and then use that material as feedstock to produce drawn over mandrel (DOM) tubes. During the DOM process, surface preparation, pointing, cold drawing, annealing and finishing operations would be performed. After the DOM process, the tubes would go through finishing operations based on individual customer specifications.

After receiving the steel tubing from other PTC Alliance facilities, the tubes would be placed into storage. From storage, the tubes would be repeatedly dipped in a tub of approximately 10-12% sulfuric acid in water to remove any deposits or impurities from the surface of the tubes. The pickled tubes would then be repeatedly rinsed in a cold rinse tub to remove any residual acid from the surfaces of the tube. From the cold rinse tub, the tubes would proceed to either the Neutralizer tub or the Conditioner tub, depending on customer requirements. The Neutralizer tub was used when the customer required a final product with zero rust. After exiting the cold rise process, the majority of the tubes would then proceed to the Conditioner tub where a layer of water based stearate compound would coat the tubes acting as a lubricant during the high pressure cold drawing operation.

After being coated with lubricant, the tubes would then be placed into the hot air dryer to remove any remaining moisture on the tubes. After drying, the tubes were cold drawn through a die and mandrel arrangement to maintain the specified inside and outside diameters of the formed tube. The tubes were then annealed at 1200 degrees Fahrenheit to strengthen the molecular structure of the tubes. After checking for cracks and imperfections in the tubes, the tubes were cut to length, coated with rust preventative oil, and banded for shipment to the customer.

The Facility utilizes water from the Jane Lew Municipal System for drinking, sanitary, and process water make-up. Industrial wastewater, after treatment, and sanitary wastes are discharged into the Jane Lew Municipal Sewage System.

III. Summary of Environmental History

From 1976 to 1984, Pittsburgh Tube Company used three surface impoundments for the settling of solids from the neutralized waste streams. The three impoundments were 100' by 75' by 6' deep, hypalon-lined ponds which had an operating capacity of 117,000 gallons. During operation, treated effluent from the lift station, including injected coagulation aid polymer, would be discharged into the first pond, where after about ten days of retention the bulk of the solids

settled out. The effluent would then flow through cross over pipes into the second pond and be retained for approximately ten days. These procedures would then be repeated for the third pond. The total retention and settling time from start to finish was about thirty days; after that, the supernatant would flow into the wet well tank and then be discharged by pumping into the Jane Lew Municipal sewage treatment system or circulated for reuse. The settled out solids would then be periodically removed and disposed of by an outside contractor.

The impoundments were closed under an interim status closure plan in 1987 and certified closed in March 1988. In September 1988, the Facility was issued a permit to operate four hazardous waste tank storage and treatment units, conduct a five-year post-closure care, and to conduct groundwater monitoring at the closed impoundment.

In 1994, the four tanks used for hazardous waste storage, as permitted by the Facility's 1988 Part B Permit, were emptied and decontaminated. Two of the tanks, the Continuous Treatment Tank and the Lift Tank were subsequently taken out of service. The other two tanks were returned to service. The Batch Tank would be part of a non-hazardous wastewater treatment system and the Haulaway Tank would be used as a 90-day accumulation tank for hazardous waste. The changes to the hazardous waste tank storage units, including the tank closure report, were incorporated into a June 1995 Class 2 Permit Modification.

In a memo to the file on June 17, 1999, the WVDEP Permitting Program Manager stated that the Pittsburgh Tube Company had, "complied with the groundwater requirements as required by the Facility's Part B Permit issued on September 08, 1988". After a review of the groundwater monitoring data and subsequent statistical analysis of the data submitted by the Facility, the Hazardous Waste Permitting Unit concluded in an interoffice memo dated August 19, 1999 that, "based on the relatively low concentration of hazardous metals constituents and the low solubility of the precipitated metal hydroxides in the sludges that may have remained after the 1987 interim status closure, the Facility poses very little threat to human health and the environment and there is no need for future corrective action". The WVDEP Assistant Chief then issued Pittsburgh Tube Company a letter on September 29, 1999 stating that the "WVDEP - Office of Waste Management no longer considers the Jane Lew, West Virginia facility to be subject to the permitting or post-closure requirements of *40 CFR Parts 264 or 265* and, therefore, groundwater monitoring activities for those purpose are no longer necessary".

Currently, there are four tubs inside a single containment area used in the DOM process: the Pickling Tub, the Cold Water Rinse tub, the Neutralizer tub, and the Conditioner tub. During operation, tubes would be repeatedly dipped in the various tubs and lifted and allowed to drain back into each respective tank. Any liquid entering the containment area, such as drippage that occurred outside of the tubs, would be collected in the secondary containment and pumped into the wastewater treatment tanks.

Spent liquor from the Pickling tub and spent neutralizer from the Neutralizer tub would be pumped to the Hazardous Waste Storage tank, also known as the Haulaway Tank. Sludges from the bottom of the wastewater treatment tank would also be pumped to the Haulaway Tank.

All solid wastes generated at the facility include spent pickle liquor and sludges from the rinsing, coating, and lubricating tubs are shipped off-site for disposal.

IV. Evaluation of EPA's Proposed Decision

EPA has determined that its proposed decision for the Facility is protective of human health and the environment and that no further corrective action or controls are necessary at this time.

V. Public Participation

Interested persons are invited to 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. Comments may be submitted by mail, fax, e-mail, or phone to Mr. Denis Zielinski at the address listed below.

U.S. EPA Region III
1650 Arch Street
Philadelphia, PA 19103
Contact: Mr. Denis Zielinski (3LC20)
Phone: (215) 814-3431
Fax: (215) 814 - 3114
Email: zielinski.denis@epa.gov

A public meeting will be held upon request. Requests for a public meeting should be made to Mr. Denis Zielinski, EPA Region III. A meeting will not be scheduled unless one is requested.

The Administrative Record contains all the information considered by EPA for the proposed decision at this Facility. The Administrative Record is available at the following location:

West Virginia Department of Environmental Protection
Office of Environmental Remediation File Room
601 57th Street
Charleston, West Virginia 25304
Contact: Ms. Cathy Guynn
Phone: (304) 926-0499, X-1288