



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III

STATEMENT OF BASIS

Sampson Morris Group
(Former Cyclops and Former Pittsburgh Industrial Plating)

Pittsburgh, Pennsylvania

EPA ID NO. PAD087569620

Prepared by
Office of Pennsylvania Remediation
Land and Chemicals Division
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List of Acronyms

| | |
|-------|---|
| AOC | Areas of Concern |
| AR | Administrative Record |
| BGS | Below Ground Surface |
| COC | Contaminant of Concern |
| EPA | Environmental Protection Agency |
| FDRTC | Final Decision and Response to Comments |
| GAC | Granular Activated Carbon |
| MCL | Maximum Contaminant Level |
| MOA | Memorandum of Agreement |
| MSC | Medium Specific Concentrations |
| NIR | Notice of Intent to Remediate |
| PADEP | Pennsylvania Department of Environmental Protection |
| PCE | Tetrachloroethene |
| RCRA | Resource Conservation and Recovery Act |
| RI/RA | Remedial Investigation and Risk Assessment |
| RSL | Regional Screening Level |
| SB | Statement of Basis |
| SWMU | Solid Waste Management Unit |
| TCE | Trichloroethene |
| UST | Underground Storage Tank |
| VOC | Volatile Organic Compound |

Section 1: Introduction

The United States Environmental Protection Agency (EPA) has prepared this Statement of Basis (SB) to solicit public comment on its proposed remedy for the former Cyclops/Pittsburgh Industrial Plating Facility located at 1 Herron Ave, Pittsburgh, PA 15202 (hereinafter referred to as the Facility or Site).

The Facility is subject to EPA's Corrective Action program under the Solid Waste Disposal Act, as amended, commonly referred to as the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Sections 6901 *et seq.* The Corrective Action program requires that owners and/or operators of facilities subject to certain provisions of RCRA investigate and address releases of hazardous waste and hazardous constituents, usually in the form of soil or groundwater contamination, that have occurred at or from their property. The Commonwealth of Pennsylvania is not authorized for the Corrective Action program under Section 3006 of RCRA. Therefore, EPA retains primary authority in the State of Pennsylvania for the Corrective Action Program.

EPA is providing a thirty (30) day public comment period for this SB. EPA may modify its proposed remedy based on comments received during this period. EPA will announce its selection of a final remedy for the Facility in a Final Decision and Response to Comments (FDRTC) after the comment period has ended.

Information on the Corrective Action program, a fact sheet, and the Government Performance and Results Act Environmental Indicator Determinations for the Facility can be found by navigating <http://www.epa.gov/reg3wcmd/correctiveaction.htm>.

The Administrative Record (AR) for the Facility contains all documents, including data and quality assurance information, on which EPA's proposed remedy is based. See Section 8, Public Participation, for information on how you may review the AR.

Section 2: Facility Background

A. Site Description and History

The Facility is an approximately five (5) acre property located at 1 Herron Avenue, Pittsburgh, PA. The Facility is bordered by a commercial/industrial area to the north and industry to the east and west. Directly south of the Facility are railroad tracks and further south is the Ohio River. Lowries Run Creek follows the Facility's property boundary to the north and east and then discharges into the Ohio River. See Figure 1 Facility Location Map.

From 1934 to 1995 the Facility was operated by Cyclops Corporation, a manufacturer of industrial metal building panels. The Pittsburgh Industrial Plating (PIP) operated the Facility from 1995 to 2002. The Facility remained vacant until 2006, when Sampson Morris purchased and redeveloped the property. Currently, the Facility maintains a mixture of office, flex space, light industrial and warehouse/distribution.

The Facility was originally owned by Cyclops/E.G. Smith Construction Products in 1934. Cyclops manufacturing included painting, roll forming, shearing, brake forming and the miscellaneous fabrication of sheet metal into panels and associated accessory items. The Cyclops facility consisted of land with a main building, a paint and chemical storage building and a parking area. Two waste management areas existed. The still bottoms drum storage area in the paint storage building which was approximately 5 feet by 15 feet in size and it was characterized by concrete floors without floor drains. The distillation room located at the eastern portion of the main building which was approximately 10 feet by 15 feet in size consisting of still system utilizing five drums, and concrete floors.

On November 15, 1980 Cyclops submitted a Part A Hazardous Waste Permit Application to USEPA. On December 22, 1980, the USEPA ID PAD087569620 was assigned.

This Statement of Basis addresses the entire 5-acre property that was included in the investigation and cleanup of the Site.

Section 3: Summary of Environmental History and Investigations

Environmental investigations and remediation actions have occurred over the Facility's history. Below are the Investigations and Remedial Actions conducted at the Site:

- September 21, 1992 Phase I Environmental Site Assessment (ESA)
- April 25, 1994 Phase I ESA
- December 14, 1994 Phase I Site Assessment and Additional Site Testing
- January 25, 1995 Source Area Characterization
- April 27, 1995 Consent Order and Agreement with PADEP between Smith Steelite and John Maneely Company (Buyer/Seller Remediation Agreement)
- February 2, 1995-September 24, 1996 Source Area Remediation and Follow up
- November 27, 1996 PIP Discharge Report
- January 13, 1997 Assessment of Potential Contamination
- December 4, 1997 Consent Order and Agreement with PADEP

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A. Environmental Investigations

Environmental investigation activities began at the Facility in 1992. Environmental evaluations included a general site-wide evaluation and detailed investigations of specific areas of potential concern. Both soil and groundwater samples were taken during the site-wide evaluation to define the areas of potential concern.

Based on the results of the site-wide evaluation, focused investigations were conducted at the areas of potential concern to define the nature and scope of contamination to select remediation activities. Soil and groundwater samples were analyzed for some or all the following constituents, based on historical operations in the area and the results of site-wide evaluation.

Soil Investigations

Soil was investigated after two releases of hazardous wastes from the plating operation that occurred in 1996 on the east side of the building. However, nearby soil sampling in these areas and stream sediment sampling in Lowries Run indicated that the chemicals analyzed were either less than or slightly above background concentrations. TPH concentrations in soil were as high as 7,320 mg/kg and 3,410 mg/kg because of the release.

In 1995, approximately 250 tons of soil were excavated from the former gasoline UST in response to elevated xylenes levels. Mobile injection treatment unit (MITU) technology was used to remediate soils within the UST area, which was then re-introduced into the excavation as clean backfill. Verification soil samples analyzed for TPH and BTEX following the source area remediation showed that these constituents were less than analytical detection limits and/or were well below PADEP generic groundwater protection levels.

The 2003 Focused Phase II Assessment indicated that cyanide at two sampling locations (300 and 420 ug/kg) were above the Act 2 soil-to-groundwater MSC for used aquifers. However, the soil is capped beneath the building and cyanide was not detected in groundwater above the applicable PADEP MSCs. Benzene in soil (2,120 ug/kg) was detected in soil samples located 10-12 feet bgs in the UST area that exceeded the used aquifer soil-to-groundwater MSC of 500 ug/kg. The exceedance is located outdoors adjacent to the building and is capped by an asphalt parking area.

Groundwater Investigations

Prior to 1987, two underground storage tanks (USTs) were removed, but no
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documentation existed. To document the removal a subsequent investigation was conducted in order to characterize soil and groundwater in the vicinity of the former gasoline UST.

Benzene, toluene, ethylbenzene were detected in two monitoring wells (MW-4 and MW-5). Benzene was detected in MW-4 and MW-5 at concentration exceeding the limit of 5 micrograms per liter (ug/L). MW-3, located hydraulically downgradient of the source area and adjacent to Lowries Run, did not contain TPH or BTEX delineating the extent of petroleum compounds. As the majority of the source area was removed and on September 24, 1996, PADEP stated that requirements of the Consent Order and Agreement (CO&A) [Buyer/Seller Remediation Agreement] have been met.

Available documentation indicates that benzene was detected at 265 ug/L in groundwater, most likely as a result of a release from a former gasoline UST. According to the Focused Phase II Assessment, groundwater contained concentrations below Pennsylvania's Land Recycling and Environmental Remediation Standards Act (Act 2) MSC with exception for benzene (265 ug/L) vs. the used aquifer MSC.

Section 4: Corrective Action Objectives

A. Soils

EPA has determined that surface soils at the Facility meet the EPA Regional Screening Levels for both residential and industrial soil.

EPA has determined that subsurface soils at the Facility exceed the EPA Regional Screening Levels for industrial soil in two locations- one for cyanide (beneath the building) and one for benzene (immediately adjacent to the buildings southern wall). both locations represent a sub-surface exposure only, and direct contact with contaminated soil is prevented, through the physical barriers of building structures, paving and uncontaminated soil.

The Corrective Action Objectives for soils are to:

- Restrict land use to non-residential use unless further remediation to residential standards is performed, and
- Establish notification and safety procedures for excavation into contaminated areas

B. Groundwater

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EPA expects final remedies to return usable groundwater to its maximum beneficial use within a timeframe that is reasonable given the particular circumstances of the project. For projects where aquifers are either currently used for water supply or have the potential to be used for water supply, EPA will use the National Primary Drinking Water Standard Maximum Contaminant Levels (MCLs) promulgated pursuant to Section 42 U.S.C. §§ 300f et seq. of the Safe Drinking Water Act and codified at 40 CFR Part 141.

The Corrective Action objectives for groundwater are to:

-Prevent potable use of groundwater unless sampling indicates that benzene is below 5 ug/l within the plant property.

Section 5: Proposed Remedy

For Facility soils and groundwater, the proposed remedy is outlined below. It proposes the implementation of institutional controls (ICs). ICs are generally non-engineered mechanisms such as administrative and/or legal controls that minimize the potential for human exposure to contamination and/or protect the integrity of a remedy. Under this proposed remedy cyanide and benzene remain in the sub-surface (> 2 feet) soils at the Facility above screening levels for industrial direct contact. Thus, the proposed remedy will require the Facility to implement land use restrictions to prohibit excavation worker exposure to such contaminants. ICs may be establishing through an enforceable mechanism such as an order, permit or an environmental covenant pursuant to the Pennsylvania Uniform Environmental Covenants Act. If the enforceable mechanism selected were to be an environmental covenant, it would be recorded with the Facility property records.

EPA is proposing that the following land use restrictions be implemented through an Environmental Covenant at the Facility:

- 1) The Facility property shall not be used for residential purpose unless it is demonstrated to EPA that such use will not pose a threat to human health and EPA provides prior written approval of such use.
- 2) Any excavation or other construction activity within the footprint of contaminated areas at the Facility shall employ measures to protect workers from unacceptable exposure to contaminants.
- 3) The Facility property shall not use groundwater unless it is demonstrated to EPA that such use will not pose a threat to human health and EPA provides prior written approval of such use.

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Under the proposed remedy, EPA is proposing to require a coordinate survey, as well as a metes and bounds survey, of the boundaries of the groundwater use restrictions, and Facility boundaries as follows:

1. The boundary of each use restriction shall be defined as a polygon; and
2. The longitude and latitude of each polygon vertex shall be established as follows:
 - a. Decimal degrees format;
 - b. At least seven decimal places;
 - c. Negative sign for west longitude; and
 - d. World Geodetic System (WGS) 1984 datum.

Section 6: Evaluation of Proposed Remedy

Consent with national guidelines, EPA evaluated proposed corrective action remedies in two phases. EPA first evaluated them against three threshold criteria. For those meeting the threshold criteria, EPA then evaluates seven balancing criteria.

| Threshold Criteria | Evaluation |
|---|--|
| 1) Protect human health and the environment | The proposed remedy protects human health and the environment by eliminating exposure pathways. Soil exposure is generally limited by the physical barriers of overlaying clean soil, concrete foundations and asphalt paving. Exposure to contaminated soil below grade would be prevented by the terms of the proposed use and implementing protection measures for workers during soil excavation activities. |
| 2) Achieve media cleanup objectives | Industrial use cleanup standards have been achieved by past remediation at the Facility. |
| 3) Remediating the Source of Releases | Remediation of source areas has been achieved by past soil excavation and UST removals at the Facility. |

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| Balancing Criteria | Evaluation |
|---|--|
| 4) Long-term effectiveness | The proposed land use restriction will maintain protection of human health and the environment over time by controlling exposure to remaining contaminated soil and groundwater. EPA anticipated that these restrictions will be implemented through an enforceable permit, order, or an environmental covenant to be recorded with the Facility property records. |
| 5) Reduction of toxicity, mobility, or volume of the Hazardous Constituents | Toxicity, mobility, or volume of the hazardous constituents has been largely reduced by past remediation at the Facility. The remaining soil contamination is overlain by physical barriers, such as clean soil, concrete foundations and asphalt parking. |
| 6) Short-term effectiveness | EPA anticipates that the proposed land use restrictions will be implemented shortly after EPA selects a final remedy. |
| 7) Implementability | EPA's proposed remedy is readily implementable. EPA does not anticipate any regulatory constraints in requiring the Facility property owners to implement institutional controls described above. |
| 8) Cost | The proposed remedy is cost effective. The Facility has already completed the remedial activities, USTs removal and soil excavation at the Facility. The cost associated with implementing the proposed land use restrictions would be minimal. |
| 9) Community Acceptance | EPA will evaluate community acceptance of the proposed remedy during the public comment period and will be described in the Final Decision and Response to Comments. |
| 10) State/Support Agency Acceptance | EPA will evaluate state acceptance during the public comment period and provide an analysis in the Final Decision and Response to Comments. |

Section 7: Financial Assurance

EPA has evaluated whether financial assurance is necessary to implement EPA's proposed remedy at the Facility. The remediation of the Facility is complete. The costs of implementing institutional controls at the Facility will be minimal. EPA is proposing that no financial assurance be required.

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Section 8: Public Participation

Interested persons are invited to comment on EPA's proposed remedy. 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 Ms. Catheryn Blankenbiller at the address listed below.

A public meeting will be held upon request. Requests for a public meeting should be made to Ms. Catheryn Blankenbiller at the address listed below. A meeting will not be scheduled unless one is requested.

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

U.S. EPA Region III
1650 Arch Street
Philadelphia, PA 19103
Contact: Catheryn Blankenbiller (3LC20)
Phone: (215) 814-3464
Fax: (215) 814-3163
Email: Blankenbiller.Catheryn@epa.gov

Section 9: Signature

Date: 8-24-17



Catherine A. Libertz, Acting Director
Land and Chemicals Division
US EPA, Region III

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Section 10: Index to Administrative Record

Environmental Indicator Inspection Report Prepared by Baker for EPA in October 2010

Environmental Indicator Current Human Exposures Under Control Prepared by PADEP and approved by EPA in August 2013

Environmental Indicator Migration of Contaminated Groundwater Under Control Prepared by PADEP and approved by EPA in August 2013

Focused Phase II Assessment prepared by CEC for Rothman Gordon in August 2003

Memorandum of Former Pittsburgh Industrial Plating Facility prepared by CEC in January 2010

Phase I ESA of E.G. Smith Construction Products, Inc. prepared by ENSR Consulting and Engineering in September 1992

Source Area Characterization prepared by Earth Sciences Consultants, Inc. in January 1995

Source Area Remediation prepared by Earth Sciences Consultants, Inc. in February 1995

Consent Order and Agreement between Smith Steelite and John Maneely Company in April 1995

Source Area Remediation prepared by Earth Sciences Consultants, Inc. in June 1995

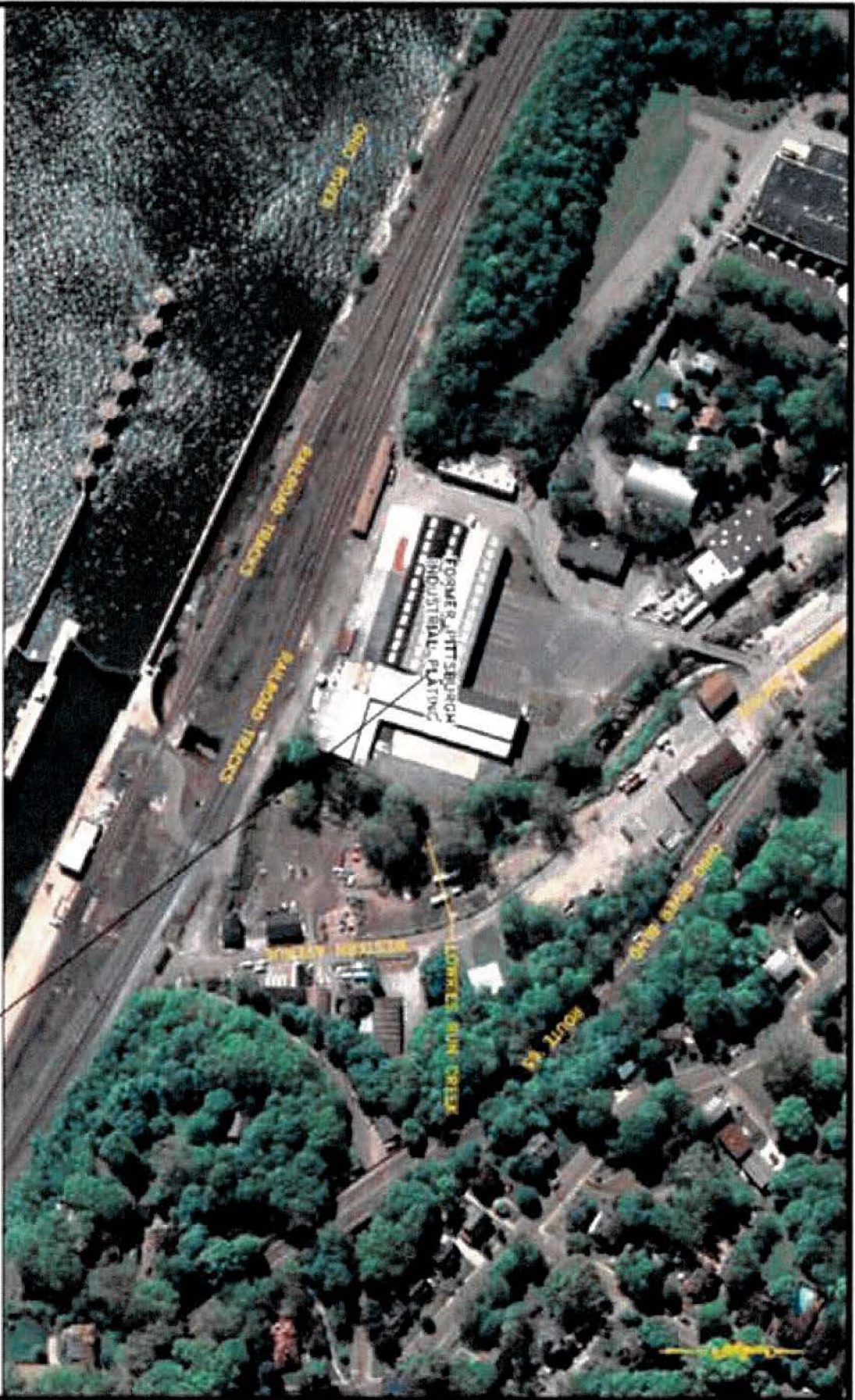
Assessment of Potential Contamination prepared by CEC in January 1997

Part A Notification of Hazardous Waste submitted in November 1980

Section 11: Figures

Figure 1 - Site Location Map

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Source: Google maps

SCALE: 1"=200'

DATE: MAY 2010

S.O. NO.: 118042

FILE: 118042-rfp-02

DSN/DMN: jpk/mjh

CHK: jpk



LAT=40°30'23.10"N
LON=80°5'22.47"W

FIGURE 1
FACILITY LOCATION MAP
PITTSBURGH INDUSTRIAL PLATING
1 HERRON AVENUE, PITTSBURGH, PENNSYLVANIA

