



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III

STATEMENT OF BASIS

ST. MARYS METAL FINISHING COMPANY
ST. MARYS, PENNSYLVANIA 15857
EPA ID No. PAD046771374

Prepared by
Office of Pennsylvania Remediation
Land, Chemicals and Development Division
June 2019

Table of Contents

Section 1: Introduction.....1

Section 2: Facility Background.....1

Section 3: Summary of Environmental History2

Section 4: Environmental Indicators3

Section 5: Public Participation.....3

Index to Administrative Record.....5

Section 1: Introduction

The United States Environmental Protection Agency (EPA) has prepared this Statement of Basis (SB) to solicit public comment on its proposed decision for the St. Marys Metal Finishing Company (SMMF) facility located at 1057 Trout Run Road, St. Marys, Elk County, Pennsylvania 15857 (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, EPA's 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 5, Public Participation, for information on how you may review the AR.

Section 2: Facility Background

SMMF is a metal finishing company located at 1057 Trout Run Road in St. Marys, Benzinger Township, Elk County, PA, on a 1.37-acre parcel. The facility has been in operation at this present location since 1971; and subsequently purchased in 2003 by Mr. Benninger, the current owner and operator of SMMF.

A small westward-flowing unnamed perennial stream, a tributary of Elk Creek is located approximately 100 yards northeast and downgradient of the SMMF building. Across Trout Run Road, to the west, is the Mersen USA (Former Carbone of America Industries Corporation), a manufacturer of carbon and graphite products. To the north, the facility is bounded by the W&H Machine shop; to the south by Seneca Resources (vacant land) and the West Penn substation; to the east by vacant land owned by John Grotzinger. A location map and a Facility layout are attached as Figures 1 and 2, respectively.

Statement of Basis

Section 2: Facility Background (continued)

SMMF conducts three kinds of plating operations: plastic impregnation to prepare parts made from powdered metal for further plating; electronic zinc plating to rust proof and improve the part's appearance; and electroless zinc phosphate to give the part a grainy coating, so it can hold oil or paint. Parts are treated, dried and shipped. The spent plating bath wastewater is neutralized and the resulting precipitated solids are flocculated. The sludge from the flocculation process is dewatered to form a filter cake and the filter cake is dried and disposed of off-site. The neutralized wastewater is discharged to a wastewater treatment plant. In the past, the SMMF facility also used trichloroethylene (TCE) as a still rinse for impregnated parts. The spent TCE was disposed off-site.

SMMF submitted a notification of Hazardous Waste Activity on July 28, 1980. A Part A Hazardous Waste Permit Application was submitted on October 27, 1980 and listed the following hazardous wastes as being generated at the facility: D006 (Cadmium waste), D007 (chromium waste), F007 (spent cyanide plating bath solution), and F008 (cyanide plating bath residue). SMMF was granted USEPA ID No. PAD046771374. The facility was granted Interim Status on July 27, 1981 for treatment, storage, or disposal of hazardous waste. On January 17, 1983, PADEP requested SMMF's Part B Permit Application. In response to the State's Part B request, SMMF submitted a new Notification of Hazardous Waste Activities on July 24, 1983. The new notification was submitted to change SMMF's status from a TSD facility to generator. On March 7, 2001, SMMF submitted a Notification of Hazardous waste Activity to reclassify the facility from a Large Quantity Generator to a Small Quantity Generator.

Section 3: Summary of Environmental History

Based upon information in the 2009 Environmental Indicator (EI) Inspection Report, EPA identified six solid waste management units (SWMUS). All SWMUs were installed on concrete floors and were in operations since 1970. These SWMUs included Chromium -Zinc Electroplating Line, Plastic Impregnation Line, Phosphate Electroless Plating Line, Batch Treatment Tanks, Wastewater Treatment System, and Sludge Hoppers.

No releases or remedial actions have been documented at the facility. As required by the lending agency, environmental investigations (Phase 1 and Phase 2 Environmental Site Assessment (ESAs)) were conducted at the site prior to the purchase by Mr. Benninger in 2003. In 2002, soil and groundwater samplings were conducted at the facility. Soil samples were collected from 8 soil borings and four GW samples were collected from 4 monitoring wells MW-1, M-2, MW-3, and MW-4.

Arsenic and chromium were detected in soil samples at average concentrations of 12.08 mg/kg and 16.17 mg/kg, respectively, within EPA's acceptable risk ranges.

Statement of Basis

Summary of Environmental History (continued)

EPA has concluded that no action is required.

Chromium was detected in groundwater at concentrations as high as 150 ug/l, slightly above the MCL of 100 ug/l. Chromium was detected in only one GW sample at concentration slightly above the MCL and was found ND in all other three samples. As the slight exceedance of chromium in groundwater was isolated in a small area and is within EPA's acceptable risk range, EPA has concluded that no action is required.

TCE was detected in groundwater samples at concentrations as high as 12 ug/l, above the MCL of 5 ug/l. EPA has concluded that these low-level TCE results represent the edge of a larger plume known to exist beneath the adjacent Mersen (formerly Stackpole) facility. Mersen's remediation activities include operation of a soil vapor extraction (from 1993/1994 to 2005) and a groundwater recovery system that continues to operate (January 25, 2018 Memorandum prepared by CEC for Mersen Facility). EPA has concluded that the low-level TCE levels found in wells MW-1 and MW-4 at the facility are being addressed by the remedial actions at the Mersen facility.

Section 4: 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 the current human exposures under control indicator on September 29, 2014 and the migration of contaminated groundwater under control indicator on May 15, 2019.

Section 5: Public Participation

Before EPA makes a final decision on its proposal for the Facility, the public may participate in the decision 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

Section 5: Public Participation (continued)

public review during normal business hours at:

U.S. EPA Region III
1650 Arch Street
Philadelphia, PA 19103
Contact: Tran Tran
Phone: (215) 814-2079
Fax: (215) 814-3113
Email: tran.tran@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 Ms. Tran Tran. EPA will hold a public meeting to discuss this proposed decision upon request. Requests for a public meeting should be made to Ms. Tran.

EPA will respond to all relevant comments received during the comment period. If EPA determines that new information warrants 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 Ms. Tran Tran at the address listed above.

Date:

6/20/19



John A. Armstead, Director
Land, Chemicals and Development Division
US EPA, Region III

Attachments:

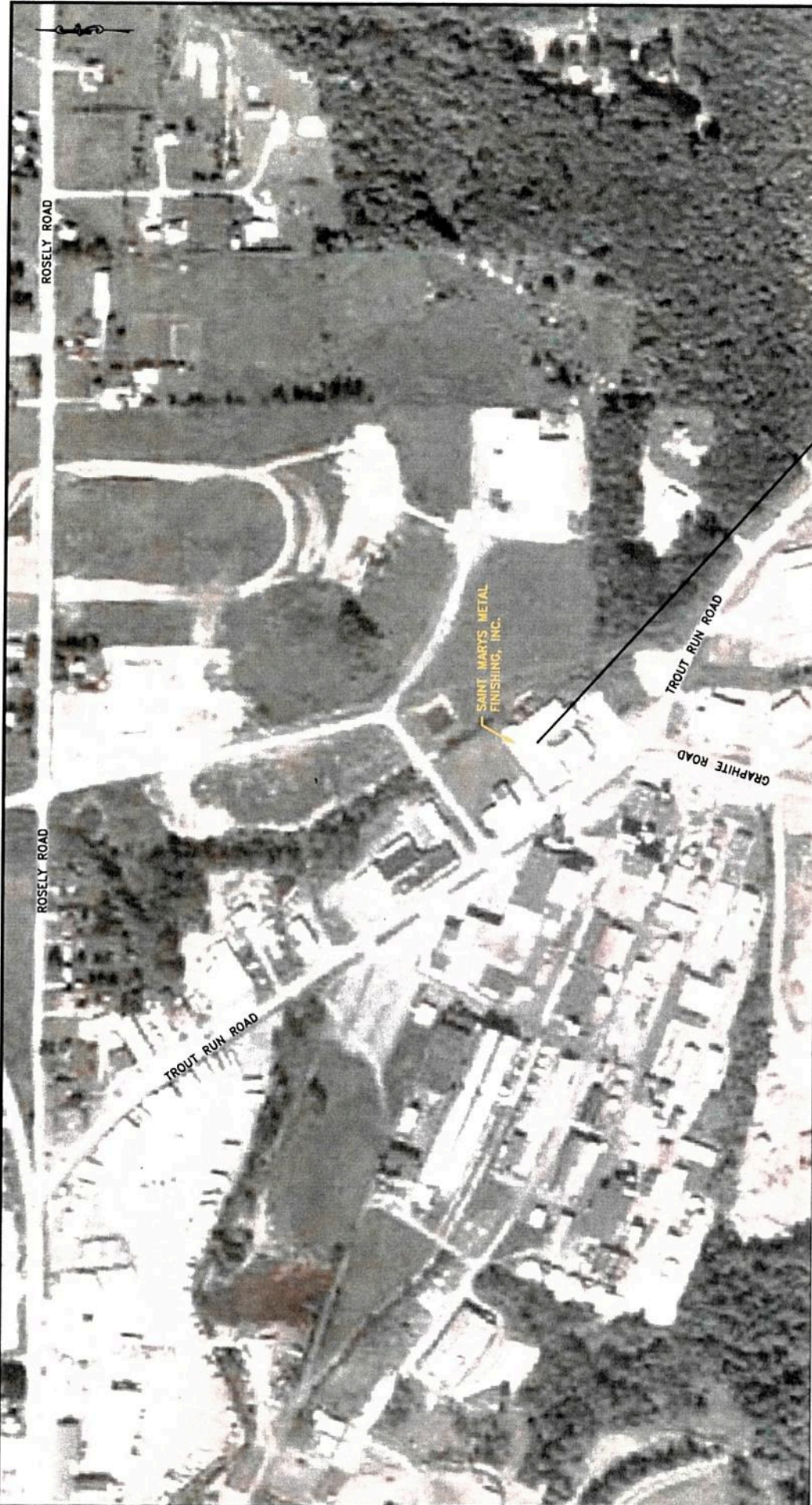
Attachment 1- Location map
Attachment 2 – Facility Layout

Statement of Basis

Index to Administrative Record

1. Final Environmental Indicator Inspection Report for St. Marys Metal Finishing, Inc., St. Marys, Pennsylvania 15857, prepared by Baker Wheeler Environmental Corporation, November 2009
2. January 25, 2018 Memorandum prepared by CEC for Mersen Facility

Attachment 1



LAT=41°25'26.75"N
 LON=78°31'24.64"W

SOURCE: GOOGLE, 2009.

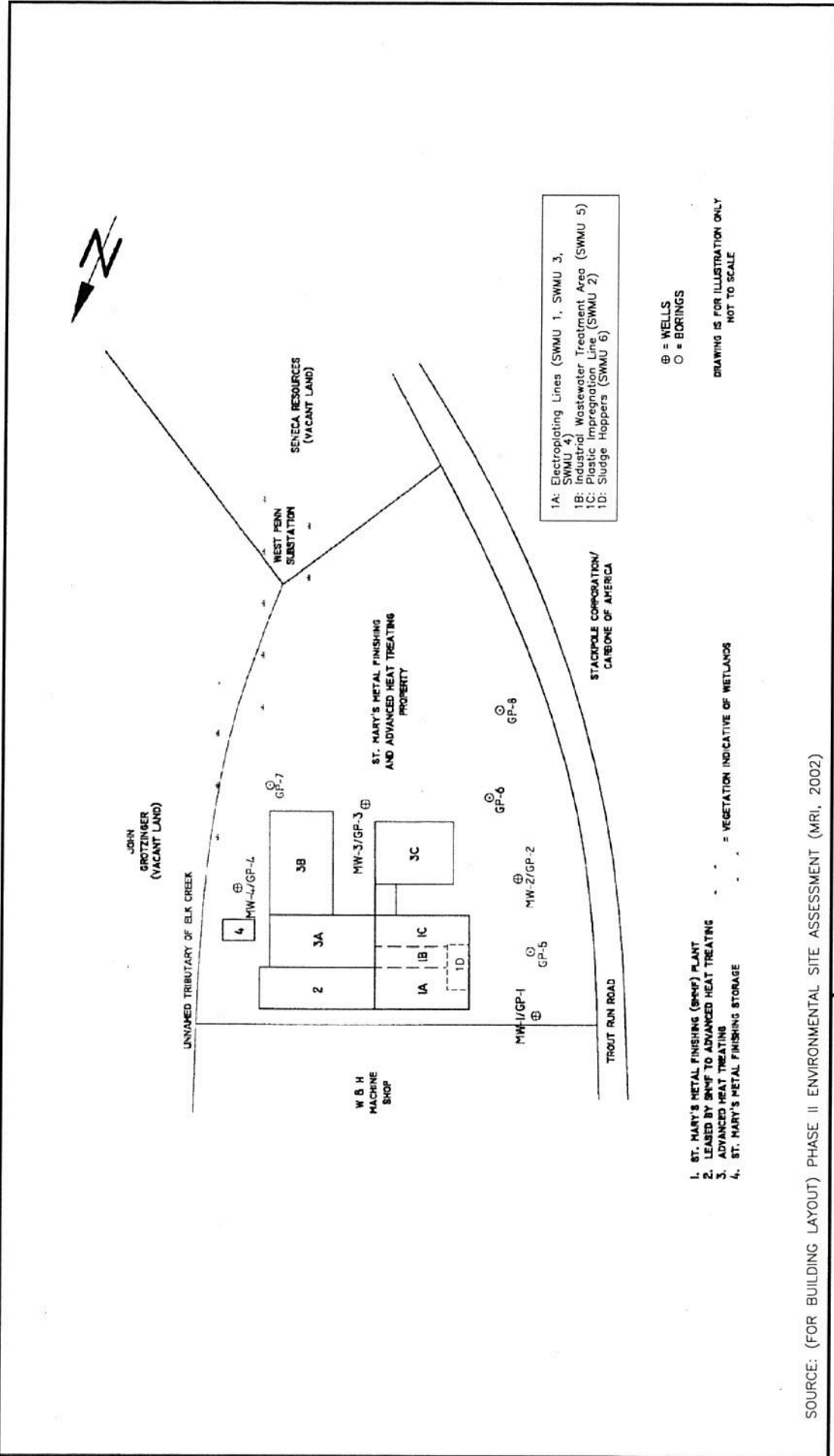
SCALE: 1"=300'
 S.O. NO.:
 DSN/DWN: SRF/RR

DATE: AUGUST 2010
 FILE: StMarysMFI_01
 CHK: SRF

Baker
 MICHAEL BAKER JR., INC.
 MOON TOWNSHIP, PENNSYLVANIA

FIGURE 1
 SITE LOCATION MAP
 SAINT MARY'S METAL FINISHING, INC. (SMMF)
 1057 TROUT RUN ROAD, ST. MARYS, PENNSYLVANIA

Attachment 2



1A: Electropolishing Lines (SWMU 1, SWMU 3, SWMU 4)
 1B: Industrial Wastewater Treatment Area (SWMU 5)
 1C: Plastic Impregnation Line (SWMU 2)
 1D: Sludge Hoppers (SWMU 6)

⊕ = WELLS
 ○ = BORINGS

DRAWING IS FOR ILLUSTRATION ONLY
 NOT TO SCALE

1. ST. MARY'S METAL FINISHING (SMPF) PLANT
2. LEASED BY SMPF TO ADVANCED HEAT TREATING
3. ADVANCED HEAT TREATING
4. ST. MARY'S METAL FINISHING STORAGE

--- = VEGETATION INDICATIVE OF WETLANDS

SOURCE: (FOR BUILDING LAYOUT) PHASE II ENVIRONMENTAL SITE ASSESSMENT (MRI, 2002)

SCALE: APPROX. 1"=100'
 S.O. NO.: 114513
 DSN/DWN: SRF/RR

Baker
 MICHAEL BAKER JR., INC.
 MOON TOWNSHIP, PENNSYLVANIA

FIGURE 2
 SITE LAYOUT
 SAINT MARYS METAL FINISHING, INC. (SMMF)
 1057 TROUT RUN ROAD, ST. MARYS, PENNSYLVANIA