



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 3
STATEMENT OF BASIS
BALL METAL BEVERAGE CONTAINER CORPORATION
BRISTOL, VIRGINIA
EPA ID NO. VAD 055 576 326
FEBRUARY 20, 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 Ball Metal Beverage Container Corporation facility (Ball) located at 750 Old Abingdon Highway, Bristol, VA 24201 (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 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 Virginia Department of Environmental Quality (VDEQ) files regarding the environmental history of the Facility as presented in the Final RCRA Site Visit Report submitted on January 14, 2008. 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. A copy of the AR is available for public review from the EPA Region 3 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 750 Old Abingdon Highway, Bristol, VA 24201. Bristol is located in Washington County, VA which is in the southwest corner of the Commonwealth.

The Facility is bordered by the Norfolk and Western Rail line to the northwest. Across from the railroad are apartment buildings. Beaver Creek borders the Facility from the north corner to the southeast side of the main building. Old Abingdon Highway follows the same route as Beaver Creek. Residential buildings are along the northeast side of the building, across Beaver Creek and Old Abingdon Highway.

In 1971, the Reynolds Metals Corporation (Reynolds) built the plant that is now occupied and operated by Ball. In 1973, Reynolds began metal beverage container manufacture operations at the plant. In August of 1998, Ball conducted Phase I and Phase II Environmental Site Assessments, purchased the plant, and continued facility operations.

The Ball Plant makes aluminum tops for beverage cans. This Facility makes the shell of the top from large rolls of aluminum sheet metal stock, and then makes the curled edge of the top and applies a rubberized compound liner to the edge of the seam of the top. Additional press details are added to the top ends. Currently one of the Facility's production lines uses a water-based compound liner material to edge the seam, while one half of the Facility's production uses a volatile organic compound (VOC) solvent-based rubberized compound liner material. The rubberized compound liner material consists of 43% VOC solvent (heptane). The newer production lines use the water-based solvent and eventually the Facility will be eliminating the VOC-based solvent rubberized compound liner material.

III. SUMMARY OF ENVIRONMENTAL HISTORY

Documentation indicates that the following waste streams have been historically generated at the Facility:

- Waste tab lube – toluene (hazardous) and isopropyl alcohol (non hazardous)

- Varsol/mineral spirits – benzene toluene (hazardous) and total oil and grease (non hazardous)
- Machine oils – total oil and grease (non hazardous)
- Spent heptane – (non hazardous)
- Equipment cleaning materials
 - Methyl ethyl ketone (MEK) (hazardous)
 - Toluene (hazardous)
 - Hexane (non hazardous)

As reported in the RCRA Site Visit Report, there were two documented releases at the site. The first release was from the Former Waste Tab Lube (WTL) Storage System. The system was a Hazardous Waste Management Unit (HWMU) operated by Reynolds Metals Company, consisting of Unit I, a 150-gallon below ground sump, and Unit II, a 10,000-gallon waste tab lube tank and piping.

The January 1999 Closure Plan indicated this system was completely removed with the exception of the associated decontaminated elevated piping located inside the manufacturing building in late 1987. The system was replaced with totes which were then replaced by 55-gallon drums located in satellite accumulation areas.

The above ground sump and sink were decontaminated in December 1987 and removed. The below ground sump was decontaminated and removed in January 1988. Elevated indoor piping associated with the 150-gallon below ground sump was drained, capped, and left in place, while elevated piping associated with the below ground sump was removed.

The 10,000-gallon below ground storage tank and associated external below ground piping were decontaminated and converted to a fresh heptane storage system in 1987 and used until 1990 when they were again decontaminated and removed.

The below ground sump was the only item associated with the WTL Storage System that had evidence of releases to the environment. Remedial measures for the 150-gallon below ground sump releases were addressed in the January 1999 Closure Plan.

A Closure Report, dated May 1999, was submitted to the VDEQ for the WTL Storage System. The VDEQ approved the Closure Completion Report and the Clean Closure Certification of the system on October 22, 2002.

The second release of approximately 300-gallons of heptane-based rubberized compound from a tank vent occurred outside of the Ball building onto the Dock Apron. As much of the material as possible was cleaned up; however, there was no regulatory involvement as the chemical reportable quantity threshold was not reached. The 1998 Phase II Environmental Site Assessment Report addressed this release documenting no adverse impacts to surface soils from this release as determined by soil testing.

The current major waste handled is waste solvents and a solvent-based compound which contains high amounts of VOCs. The facility generates and manages hazardous waste as a small

quantity generator (SQG) in accordance with RCRA Regulations under 40 CFR § 262.34. Hazardous wastes are temporarily stored on site for less than 180 days and are shipped off site to a RCRA-regulated treatment, storage, disposal (TSD) facility for treatment and 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 notice is published in a local newspaper. Comments may be submitted by mail, fax, email, or phone to Mr. Denis Zielinski at the address listed below.

A public meeting will be held upon request. Requests for a public meeting should be made to Mr. Denis Zielinski 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 decision at this Facility. To receive a copy of the Administrative Record, contact Mr. Denis Zielinski at the address below:

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Philadelphia, PA 19103
Contact: Mr. Denis Zielinski (3LC20)
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