STATEMENT OF BASIS

Pure Carbon Company
PAD 002 103 273

1. INTRODUCTION

This Statement of Basis (SB) outlines the Environmental Protection Agency's (EPA) review of the environmental conditions at the Pure Carbon facility in Coudersport PA and provides the basis for EPA's conclusion that no further investigation or clean-up is necessary at this facility, at this time. EPA has prepared this SB as part of the corrective action program under the resource Conservation and Recovery Act (RCRA) and, particularly, under the Hazardous and Solid waste Amendment (HSWA) as passed by Congress in 1984.

EPA proposes that no further investigation or clean up of hazardous or solid waste releases are necessary at the Pure Carbon Company. EPA's proposal is based on a comprehensive review of several investigations that Pure Carbon Company completed under the direction of the Pennsylvania Department of Environmental Protection (PADEP) as well as a site inspection and meeting held with Pure Carbon personnel on April 9, 1997. The EPA had also reviewed the environmental status of this facility in 1991 as part of a cooperative arrangement with the EPA Superfund site assessment program. The report generated by that review is also relied upon to support EPA's proposed determination that no further action is necessary at this time.

As part of this process EPA informed Pure Carbon by letter dated April 24, 2000 that the current conditions at the facility meet EPA's environmental indicators. Namely, EPA found that there are no risks to human health from past releases and there are no unacceptable levels of contamination migrating in groundwater beneath the property.

Should new information indicate a need to review this decision, EPA will work with Pure Carbon and PADEP to take appropriate action.

II. FACILITY BACKGROUND

The Pure Carbon Company is located on US Route 6 in Coudersport, PA. The facility has operated at this 56-acre location since 1958. Pure Carbon is an active manufacturer of mechanical carbon gaskets and seals, and ceramic shielding for motor vehicles. Prior to 1958, the property was farmland.

The facility building is approximately 220, 000 square feet and houses the production, storage, and warehousing functions of the business operations. All hazardous wastes generated by Pure Carbon's operations are stored less than 90 days on-site before removal to permitted off-sites facilities. Wastes generated by the manufacturing operations include various phenolic resins,

carbon and copper dust, waste solvents including 1,1,1,-trichloroethane (TCA) (no longer used) methyl alcohol, petroleum naphtha as well as sodium hydroxide. Units and operations that manage wastes at the facility include three settling ponds that were closed in 1990, a small drum storage area, dust collection equipment and a solid waste landfill that received various plant solid waste until it was closed under PADEP oversight in 1992. Quarterly groundwater monitoring continues at the landfill under the supervision of the PADEP office in Williamsport, PA.

III. RELEASE HISTORY/OPERATIONS OF INTEREST

Eight solid waste management units have been identified at the facility: (1) the hazardous waste drum storage area (which receives all hazardous waste generated at the facility) (2) the satellite accumulation area (which is used to temporarily store waste before it is moved to the storage area) (3) the water treatment system (which uses clarification tanks to remove suspended solids from process waters) (4) the inside baghouse (which collects carbon dust and copper bearing dust generated by machining operations)(5) the outside baghouse dust collectors (which collect carbon and copper bearing dust generated by machining operations) (6) the former lead contaminated pond (which underwent closure in 1990) (7) the former settling ponds (which underwent closure in 1990) and (8) the process waste landfill (which received non-hazardous carbon scrap and non-hazardous sledges from wastewater treatment prior to its closure).

As part of the Environmental indicator review, EPA evaluated each of these solid waste units to determine if any significant release of hazardous waste or hazardous waste constituents occurred during the operating life of the unit. EPA's conclusions are presented for each unit.

(1) Hazardous Waste Storage Drum Area

This unit is outdoors and is comprised of a 30X30 ft concrete pad surrounded by concrete curbing that acts as a containment system in the event of spills. A building (roofs and walls) was added to the storage area in 1992 at the direction of PADEP to prevent rainfall accumulation. At one time, this unit operated as a full RCRA storage unit, meaning that wastes could be stored longer than 90 days. However, in 1985, Pure Carbon removed all drums, cleaned the unit and subsequently operated it as less-than 90 day storage unit. This activity took place under a plan approved by the State. Plant wastes are stored in this unit for less than 90 days until the wastes are removed by permitted haulers to an approved treatment facility. PADEP inspectors inspect this area regularly. There is no record or any evidence of a release from this unit.

(2) Satellite Accumulation Area

Hazardous Waste Satellite Accumulation Areas are used near the points of waste generation. Flammables are kept in the proper storage cabinets. This area is a 10X10 ft area inside the main building where wastes are staged awaiting transport to the drum storage area outside. Drums are typically placed on metal pans to contain any potential leak or spill. There is no record or evidence of any release from this unit.

(3) Water Treatment System

The water treatment system is located in the central portion of the building and utilizes clarification tanks to remove suspended solids from process water. At one time, this system discharged to a ditch leading to Mill Creek. Non-contact cooling water discharged through outfall No.001 and contact process water through outfall No. 002. Both outfalls were regulated by NPDES permits issued by PADEP. In the early 1990's the discharge of contact process water was eliminated when Pure Carbon installed a closed loop system to reuse this water in the process.

The file contains evidence of two releases to the ditch leading to Mill Creek. There was an intermittent release of oil from a rooftop compressor that discharged along with carbon fines. This situation was handled through the removal of material from the drainage ditch and the installation of oil booms and pads to intercept oils leaving the rooftop during rain storms. An oil/water separator was added to the compressor exhaust. The ditch cleaning work was formally approved by PADEP on August 16, 1991.

There was also a series of NPDES permit violations involving waste water discharges above the permit standard for antimony. This release was subject of an enforcement action by PADEP and has ceased with the elimination of the NPDES outfall and the conversion to recirculating water systems. Since appropriate action was taken at the time of these releases by Pure Carbon and PADEP, no further action is necessary.

(4) Inside Baghouse Units

The indoor system has been operational since 1959 and it collects non-hazardous carbon dust generated by molding and mixing operations. The collected dust is sold to a metal fines company who sells their material to steel mills to raise the carbon content of steel. The system operates under a PADEP air permit. There is no further action necessary for this system.

(5) Outside Baghouse Units

The outdoor system is located at the southwestern corner of the main building. This system was used to collect dust generated from carbon motor brush manufacturing. This business was sold many years ago. The dust is non-hazardous and is ultimately recycled for the copper content. The system operates under an air permit from PADEP.

(6) Former Lead Contamination Pond

This unit is a 6,800 square foot impoundment that began operation in the early 1960's. The pond received waste waters from a former manufacturing operation that generated a lead-contaminated wastewater. The manufacturing operation ceased in March of 1990.

The lead pond was closed under PADEP oversight. Closure included the excavation and treatment of approximately 800 cubic yards of sludge and soil. Lead levels in the sludge ranged from 1000-3600 mg/kg. No volatile organic compounds were detected in the sludge. This material was shipped to a permitted facility in Ohio for final disposal.

Groundwater monitoring wells were installed and sampled beginning in November 1990. Sample results indicate no lead present above detection levels in any of the samples. Although the detection limit used for this sampling was 100 ug/l, subsequent groundwater sampling showed no lead present above 20 ug/l. Since the Maximum Containment Limit (MCL) for lead is 15 ug/l, no further action is necessary.

(7) Former Settling Ponds

Pure Carbon operated two settling ponds designed to remove carbon particulate from waste process waters prior to the water's discharge to Mill Creek via an open ditch. These ponds were dredged and the materials removed was found to be non-hazardous by testing. Pure Carbon closed these ponds in the summer of 1990 with PADEP approval. The ponds were replaced with a clarified system that utilized tanks and recirculated the water for process use.

As part of the closure of these units, Pure carbon installed a groundwater monitoring system that utilized six shallow wells to monitor the impact of plant activities on the shallow groundwater. This system was installed in accordance with PADEP oversight and approval. The well system was used to determine groundwater elevations as well as to delineate very low level volatile organic contamination.

The groundwater monitoring program was initially planned to continue for five years; however, PADEP concluded that 12 quarters of groundwater monitoring is sufficient to conclude that the extremely low levels of detectable organics were declining and represented no threat to human health or the environment. Sampling in Mill Creek in the past years showed no detectable levels of volatile organics. Similarly, shallow groundwater sampling indicated that volatile organic levels were either below the compound MCL or, in the worst case, only slightly above the MCL (for example, TCE was detected in Well MW-7 at a value of 8 ug/l and the MCL for TCE is 5ug/l. Based on this information, PADEP informed Pure Carbon in May of 1995 that ground water monitoring was no longer necessary in the vicinity of the closed ponds. After reviewing the information collected by Pure Carbon and PADEP, EPA agrees that groundwater monitoring is no longer necessary in the vicinity of the closed ponds.

(8) Process Waste Landfill

The two acre process landfill located on Pure Carbon property and permitted as a residual waste landfill by PADEP. In the past, the landfill received non-hazardous solid waste including carbon scrap, ceramic molds, and water treatment sledges. The landfill is inspected by PADEP

Waste Management staff on a routine basis. Pure Carbon installed three wells to monitor groundwater beneath the fill. Sampling results submitted to PADEP and reviewed by EPA indicate no detections of volatile organics or heavy metals in the landfill wells. This unit will be properly closed under PADEP supervision when it reaches its permitted capacity and there is no evidence of any releases. EPA finds there is no corrective action necessary for this unit.

IV. SUMMARY SCOPE OF CORRECTIVE ACTION

Based on the above findings, any issues related to the corrective action program under RCRA have been properly resolved through Pure Carbon and PADEP efforts. Groundwater monitoring results demonstrate the levels of volatile organics, once present samples at low levels, have attenuated to levels at or below drinking water standards.

EPA is proposing in this Statement of Basis that no further investigation or cleanup is required at the Pure Carbon facility.

V. PUBLIC PARTICIPATION

On September 12, 2001 EPA placed an announcement in the Potter Leader-Enterprise of Coudersport, PA to notify the public of their opportunity to comment on EPA's proposed no further action decision at the Pure Carbon Company. Pure carbon provided minor corrections, but no public comments were received.