



UNITED STATES

ENVIRONMENTAL PROTECTION AGENCY

REGION III

STATEMENT OF BASIS

NATIONAL ELECTRICAL CARBON PRODUCTS, INC.

100 STOKES AVENUE

EAST STROUDSBURG, PENNSYLVANIA

EPA ID NO. PAD 059282459

## TABLE OF CONTENTS

SECTION	PAGE
I. Introduction.....	1
A. Facility Name.....	1
B. Purpose of Document/Proposed Decision.....	1
C. Importance of Public Input.....	2
II. Facility Background.....	2
III. Summary of the Environmental History .....	2
IV. Evaluation of EPA's Proposed Decision.....	3
V. Public Participation .....	4

### **I. Introduction**

#### **A. Facility Name**

The United States Environmental Protection Agency (EPA) has prepared this Statement of Basis (SB) for the National Electrical Carbon Products facility located at 100 Stokes Avenue, East Stroudsburg, PA 18301 (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 there are no current or unaddressed releases of hazardous waste or hazardous constituents from the Facility. Therefore, no further corrective action or controls are required at the Facility at this time. EPA's proposed decision is based on a review of EPA and Pennsylvania Department of Environmental Protection (PADEP) files regarding the environmental history of the Facility, and a site inspection conducted by PADEP on September 30, 1999.

## **C. Importance of Public Input**

Before EPA makes a final decision on its Corrective Action Complete without Controls determination 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 EPA Region III 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 National Electrical Carbon Products property is located in East Stroudsburg, Monroe County, Pennsylvania. The site is located on approximately 10 acres of land and contains a 62,000-square foot production building. The site produces industrial-grade carbon, which is used primarily for brushes in electrical motors. The industrial carbon is manufactured by combining carbon lampblack, coal tar, pitch, and metal additives. Hazardous wastes generated at the facility include halogenated and nonhalogenated solvents, ignitable and corrosive solids, and spent oils. Hazardous wastes are removed off-site according to PADEP waste management regulations.

## **III. Summary of Environmental History**

### **A. Notification**

The facility's first Notification of Hazardous Waste Activity was received by the United States Environmental Protection Agency (USEPA) on July 29, 1980. The facility applied for a Part A Hazardous Waste Permit on November 12, 1980, re-evaluating the hazardous wastes that are generated at the facility: F001 (halogenated solvents), U125 (furfural or ignitable solid), D001 (ignitable), D002 (corrosive), and D008 (lead) under process code S01 (storage in containers). The Facility submitted to PADEP a request for withdrawal of their Part B application on June 28, 1983.

No documented spills or incidents were reported for this property.

### **B. Description of Solid Waste Management Units (SWMUs) or Areas of Concern (AOCs)**

#### Drum Storage Pad (SWMU No. 1)

The drum storage pad is used to store drums of unused chemicals as well as drummed quantities of hazardous and nonhazardous waste. The drums are stored in the back of the production facility, awaiting pick-up by various operators. These crucibles are considered non-hazardous waste under current regulations.

#### Treatment Room (SWMU No. 2)

The solvent treatment room is a storage and transfer room for virgin solvents, oils, resins, and varnishes used in the production of carbon graphite. The solvent treatment room is located in the western corner of the production building, adjacent to the finished product storage area. The 55-gallon metal drums are located on a metal rack placed above a cement floor. In the late 1990s most of the brush fabrication operations were moved to other Morgan facilities and impregnation operations were substantially reduced. Most of the equipment related to the impregnation process was removed from the facility and the remaining equipment in this area is now used intermittently. Satellite accumulation was used in this area to accumulate and transfer waste.

#### Waste Drum Storage Area (SWMU No. 3)

Drum storage area located in the northwestern grass lot, approximately 225 feet northwest of the production facility's northern corner. This storage area is for metal 55-gallon drums containing carbon blanks and scrap carbon.

#### Railcar Bulk Storage Area (SWMU No. 4)

A virgin bulk products storage area is located northeast of the production building, along the rail line. Bulk storage rail tank cars are stored in this area. Typically the facility has three rail tank cars at a time in this area. Two of the tank cars contain pitch, and the third tank car contains coal tar. Each rail tank car has the capacity to hold approximately 10,000 gallons. This area also contains a 20,000 gallon fuel oil tank.

#### The Press Pit Area (SWMU No. 5)

Two presses are located in the bulk manufacturing area of the building. Hydraulic oil that is spilled or leaked from the presses collects in the sumps. The oil is pumped from the sumps into 55-gallon drums. A contractor removes the spent oil on an as needed basis, including the presses' annual oil change.

#### Carbon Dust Collection Roll-offs (SWMU No. 6)

The dust collection roll-offs were used to collect carbon dust collected from two on-site bag-houses. The carbon dust is currently removed off site as a non hazardous solid waste.

#### Off-Specification Carbon Drums (SWMU No. 7)

Off spec carbon drums are stored at this location. The bulk carbon is handled as a non-hazardous material.

#### Spent Crucible Drums (SWMU No. 8)

The waste that is stored in this area is broken ceramic crucibles. The crucibles are stored in metal drums placed on wooden pallets. Spent crucibles are broken ceramic molds used to encase and protect the carbon during heat treatment in the carbonization ovens. These spent crucibles are stored in drums and are considered non-hazardous.

## C. Remedial Action to Date

### Drum Storage Pad (SWMU No. 1)

No releases of hazardous waste or hazardous waste constituents are known or suspected at this storage area.

### Treatment Room (SWMU No. 2)

The 300-gallon underground tank was removed the same time that most of the treatment operations were removed from the facility in the late 1990s. The tank was originally installed to catch any liquids spilled in the Treat Department. The floor drains leading to that tank were sealed.

No releases of hazardous waste or hazardous waste constituents are known or suspected at this storage area.

### Waste Drum Storage Area (SWMU No. 3)

No releases of hazardous waste or hazardous waste constituents are known or suspected at this storage area. Drums are no longer stored in this area.

### Railcar Bulk Storage Area (SWMU No. 4)

Previous inspections noted black stains on the ground around the rail cars that stored coal tar and coal tar pitch. The soils in this area were sampled and any contaminated soils were excavated and disposed off site. Improvements were made to the rail car storage area, including installation of an improved material transfer systems and installation of a concrete secondary containment structure that completely surrounds the rail cars.

### The Press Pit Area (SWMU No. 5)

No releases of hazardous waste or hazardous waste constituents are known or suspected at this area

### Carbon Dust Collection Roll-offs (SWMU No. 6)

Waste accumulation and storage practices have been revised to substantially reduce the possibility of releases from current operations. Carbon baghouse dust is no longer stored in roll-offs, the dust is stored in sealed supersacks under roof, and out of the weather. No releases of hazardous waste or hazardous waste constituents are known or suspected at this area

### Off-Specification Carbon Drums (SWMU No. 7)

Waste accumulation and storage practices were revised to substantially reduce the possibility of releases. Drums are no longer stored outside, whether filled or empty, and waste is shipped off site in a more expeditious manner. No releases of hazardous waste or hazardous waste constituents are known or suspected at this area

### Spent Crucible Drums (SWMU No. 8)

Although this material stored in drums did not contain hazardous constituents, there was visible carbon staining on the ground in some areas. The gravel area around this location was excavated (any soil or gravel that was visibly stained black was scraped up and disposed off site) and the removed soil/gravel was replaced with clean gravel. No releases of hazardous waste or hazardous waste constituents are known or suspected at this storage area.

#### Solvent Transfer Pad (AOC)

The facility “solvent transfer pad” was eliminated in 1991. Facility management identified for remediation the outside concrete pad where drums of virgin oil and chemicals were dispensed for use in the facility. The facility determined that outside storage and dispensing of virgin oil and chemicals was not a good management practice, and moved transfer operations inside the building. In November 1991, Gilarde Environmental Management, Inc., demolished the pad, removed the concrete and excavated soil from the area. A total of 384 tons of soil was removed from the drainage ditch (described below) and the area surrounding the solvent transfer pad. This material was shipped off site for disposal as non-hazardous waste to American Landfill in Waynesboro, Ohio. BCM performed post-excavation sampling and analysis to verify the success of the remediation. The areas were restored, including placement and compaction of clean fill, on November 27, 1991.

#### The Drainage Ditch along Crowe Road (AOC)

The area along Crowe Road, including the drainage ditch, had been used by residential neighbors for years as a dumping ground. The drainage ditch and the side of the road were filled with trash and debris, and there was reportedly evidence that neighbors had dumped used oil from vehicle oil changes in the ditch. The drainage ditch was identified as an area of concern in a 1988 Phase I/Phase II investigation conducted when the facility was purchased from General Electric by Morgan.

In November 1991, Gilarde Environmental Management, Inc., excavated 2-3 feet of soil from the drainage ditch along Crowe Road. Facility personnel report that the drainage ditch area has been kept clean since the facility cleaned up the area. Signs were posted prohibiting dumping and any litter has been picked up. Neighbors no longer use the side of the road as a dumping area.

#### On site transformers (AOC)

In 1988 the Facility replaced used capacitors associated with the induction furnaces. These capacitors were filled with PCB-laden oil. The oil and capacitors were placed within four 55-gallon metal drums and manifested off site.

### **IV. Evaluation of EPA's Proposed Decision**

EPA’s proposed decision that no further action or controls are needed at the National Electrical Carbon Products East Stroudsburg facility is protective of human health and the environment. EPA’s proposed decision represents a “Corrective Action Complete without Controls” as described in EPA Guidance found in the Federal Register / Vol. 68, No. 37 / Tuesday, February 25, 2003 / Notices [FRL – 7454-7] pages 8757 to 8764.

### **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. Grant Dufficy at the address listed below.

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

The Administrative Record contains all information considered by EPA when proposing a Corrective Action Complete without Controls determination for the Facility. The Administrative Record is available at the following location:

U.S. EPA Region III  
1650 Arch Street  
Philadelphia, PA 19103  
Contact: Mr. Grant Dufficy (3LC30)  
Phone: (215) 814-3455  
Fax: (215) 814 - 3113  
Email: [dufficy.grant@epa.gov](mailto:dufficy.grant@epa.gov)