



UNITED STATES

ENVIRONMENTAL PROTECTION AGENCY

REGION III

STATEMENT OF BASIS

NEW YORK WIRE

YORK, PENNSYLVANIA

EPA ID NO. PAD098737737

## **I. Introduction**

The United States Environmental Protection Agency (EPA) has prepared this Statement of Basis (SB) for the New York Wire facility located at 829 Loucks Mill Road, York PA 17402 (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, our 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 V, Public Participation, for information on how you may review the AR.

## **II. Facility Background**

The Facility is located at 829 Loucks Mill Road, York, Spring Garden Township, York County, Pennsylvania. The Facility is bordered by Interstate 83 to the north, Windsor Street to the south, Loucks Mill Road to the west, and the Pennsylvania Railroad to the east. The Facility covers approximately 5.5 acres and is surrounded by commercial and industrial properties.

In 1935 the Ram's Head Wire Division (Ram's Head) of the Root Corporation began operating at the Facility. Ram's Head's operations included resizing aluminum, steel, and bronze alloys from rods to fine wires in order to produce screens and other fine mesh products. Ram's Head filed a RCRA Hazardous Waste Part A Permit Application with EPA in August 1980 for the treatment of hazardous wastes in two wastewater impoundments located at the Facility. Sometime in the mid-1980s Ram's Head changed its name to New York Wire Company.

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

### **A. Abandoned Oil Lagoon**

In October 1983, New York Wire submitted a closure plan to the Pennsylvania Department of Environmental Protection (PADEP) for an abandoned oil lagoon located on the Facility. Sampling detected low concentrations of volatile organic compounds (VOCs) that decreased rapidly with depth. Sludge and a two-foot layer of soil were excavated from the lagoon, then it was backfilled with clean fill and graded. Closure of the lagoon was certified by PADEP in September 1984.

### **B. Underground Storage Tanks**

A 10,000-gallon underground storage tank (UST) formerly used to collect waste oil from various mill machines was removed in 1986. The tank was in good condition, and no leaks were discovered.

In September 1994, New York Wire removed two 5,000-gallon and one 1,000-gallon fuel oil USTs from the Facility. One of the 5,000-gallon USTs contained a hole, and a small amount of visible product was observed under the UST during its removal. As a result, approximately 450 tons of soil were excavated from around the area of the UST. Ten post-excavation soil samples were collected, two of which contained elevated petroleum hydrocarbon concentrations. In response, New York Wire conducted a subsurface investigation at the former UST area in February 1995. No VOCs were detected in field-screened soil samples, and no diesel-range organics (DRO) were detected in analyzed soil samples except for one soil sample with an estimated concentration of unidentified heavier hydrocarbons that was below the PADEP DRO soil standard. Although low levels of DROs and toluene were detected in groundwater from newly installed wells MW-5 and MW-6 in the area, quarterly sampling of these wells revealed steady or decreasing concentrations through 1995. No detections of benzene, toluene, ethyl

benzene, xylenes, or naphthalene were discovered in either of these two wells during annual sampling events from 1996 to 1998; therefore, PADEP concluded that no further groundwater testing was required for this area.

### **C. Buried Drums**

During construction activities in the summer of 1999, buried drums were discovered in the area north of the Facility building. The drums contained lubricating/emulsion oils, which had been used in Facility processes prior to 1970. New York Wire further characterized and removed the buried drums. Samples of visually contaminated soils indicated that the material sampled was non-hazardous. An electromagnetic survey was performed to determine the extent of excavation necessary to remove buried drums and contaminated material.

Two excavations were conducted. A total of six drums, their contents, and associated contaminated soil were removed from the first excavation. PADEP permitted New York Wire to leave three drums and the surrounding soil in place beneath the existing concrete pad area and liquid nitrogen tank. Results from soil samples collected from the floor and sidewalls of the excavation were all below PADEP closure standards for each parameter as listed in "Closure Requirements for Underground Storage Tank Systems" of April 1998; therefore, the excavation was backfilled.

A total of approximately six drums and drum remnants were removed from the second excavation. A dark "band" of stained soil approximately four to six feet deep extended past the excavation. Two exploratory trenches were excavated to the north and northwest to determine the extent of the band. Evidence of the band was discovered in both trenches. PADEP oversaw the excavation of soil until results from soil samples collected from the floor and sidewalls of the excavation and the dark band in the north trench were all non-detect for the parameters listed in the PADEP closure standards.

After reviewing soil analytical results and disposal documentation from both excavations, PADEP determined that no further action would be required in an October 1999 letter to the Facility.

### **D. Wastewater Impoundments**

In April 2002 PADEP approved a closure plan for the former wastewater impoundments. New York Wire began closure activities in 2003 and removed approximately 900 tons of soil from the base of the impoundments and collected soil samples to determine the lateral and vertical extent of soil contamination in the impoundments. Twelve soil borings were installed and sampled in March 2004 for inorganic compounds known to have been discharged to the impoundment area (results from groundwater monitoring in 1999 for the full list of contaminants suggested that the list of analytes could be reduced to inorganic compounds only). Sample results demonstrated that all inorganic compounds were below the Act 2 residential direct contact Statewide Health Standards (SHS) except for iron, and all inorganic compounds were below the Act 2 non-residential used aquifer soil-to-groundwater SHS except for boron and iron. Therefore, a synthetic precipitation leaching procedure analysis was performed which indicated that the SHS for boron had been demonstrated, and five confirmatory soil samples were collected to characterize the extent of iron contamination. Eleven tons of additional soil were excavated as

a result, and eight systematic random samples collected after excavation confirmed that iron concentrations no longer exceeded the direct contact SHS. As an added protective measure, New York Wire covered the impoundments with clean fill and seeded the area in August 2006.

All contaminant concentrations from the closure of the impoundments are below EPA's Regional Screening Levels (RSL) for Residential Soil except for iron, which slightly exceeds the RSL in two of eight samples. Given that RSLs are not cleanup standards but are risk-based, iron is prevalent in the environment and has relatively low toxicity, and 75% of the samples are below the RSL, no adverse impacts are expected from these exceedances.

### **E. Groundwater Investigations**

New York Wire performed eight rounds of groundwater sampling from MW-1, MW-2, MW-3, and MW-4 from 1992 to 2007; two of these rounds occurred after the 2003 soil removal associated with the impoundments and three rounds occurred after the impoundments were covered with clean fill in 2006. Analytical results indicated that iron, manganese, boron, chloride, and sulfate exceeded SHS in down-gradient wells MW-2, MW-3, and MW-4; and fluoride exceeded SHS in up-gradient well MW-1. Groundwater modeling was performed to determine if these exceedances presented a concern to Codorus Creek, located approximately 600 feet west of the Facility and the likely discharge point for groundwater beneath the Facility. The modeling showed that contaminant concentrations would not present a concern to Codorus Creek. Contaminated groundwater from the Facility is not expected to migrate beyond the creek. These results were approved by PADEP in March 2008.

As a result of the groundwater exceedances of the SHS, an environmental covenant was required by PADEP to restrict use of groundwater beneath the Facility. The environmental covenant also includes annual monitoring and reporting requirements to confirm the presence or absence of water supply wells on two down-gradient properties. The environmental covenant was approved by PADEP in March 2009. The environmental covenant can be accessed via the PADEP website at:

<http://www.depgis.state.pa.us/pa-aul/PdFFetcher.ashx?DocID=76840&extension=PDF>

All contaminant concentrations detected in groundwater during the last four quarters of compliance monitoring are below EPA's Maximum Contaminant Levels (MCL) for drinking water. Manganese concentrations in one well during one (2<sup>nd</sup> qtr.) of the four quarters slightly exceeded the RSL for Tapwater; however, given that the other three samples for this well were well below the RSL, no adverse impacts are anticipated from this exceedance.

### **F. Remedial Investigation and Final Report**

New York Wire submitted a Remedial Investigation and Final Report (Final Report) under Act 2 to PADEP in May 2009. The Final Report detailed the investigative and cleanup activities that occurred at the Facility from 2002 to 2009. PADEP approved the Final Report in August 2009.

## **IV. 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 these indicators on October 8, 2009.

## **V. Public Participation**

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 all information considered by EPA in reaching this proposed decision. It is available for public review during normal business hours at:

U.S. EPA Region III  
1650 Arch Street  
Philadelphia, PA 19103  
Contact: Griff Miller  
Phone: (215) 814-3407  
Fax: (215) 814-3113  
Email: [miller.griff@epa.gov](mailto:miller.griff@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 Mr. Griff Miller. EPA will hold a public meeting to discuss this proposed decision upon request. Requests for a public meeting should be made to Mr. Miller.

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

Date: \_\_\_\_\_

Abraham Ferdas, Director  
Land and Chemicals Division  
US EPA, Region III