

UNITED STATES

ENVIRONMENTAL PROTECTION AGENCY

REGION III

STATEMENT OF BASIS

REILLY FINISHING TECHNOLOGIES

NANTICOKE, PENNSYLVANIA 18634

EPA ID NO. PAD 050919901

TABLE OF CONTENTS

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

I. Introduction

A. Facility Name

The United States Environmental Protection Agency (EPA) has prepared this Statement of Basis (SB) for the Reilly Finishing Technologies (Reilly) facility located at 130 Alden Road, Nanticoke, PA 18634 (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 to make a Corrective Action Complete without Controls determination for the Facility. 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 as presented in the Final Environmental Indicator Inspection Report submitted in October, 2003. Based on this review, EPA has concluded 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.

C. Importance of Public Input

Before EPA makes a final decision on its Corrective Action Complete without Controls determination for 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 Facility covers 0.5 acres and is located at 130 Alden Road in Nanticoke, Luzerne County, Pennsylvania. The Facility is bordered by Alden Road to the east. A primarily residential/small industrial area is located immediately north, south, and west of the site.

The majority of the site is comprised of a 27,000 square foot building. Warehouse space, offices, a laboratory, sand blasting area, plating lines, drum storage area for chemicals, waste treatment system, waste storage area, two 250-gallon storage tanks (containing nitric acid solution), and four roof mounted scrubbers are located in the building. Reilly is involved in metal finishing, primarily for the aerospace and electronic industries. The major facility operations consist of electroless nickel and zinc plating. A small portion of chrome and copper work is also performed. Methylene chloride and mineral spirits had been used in the manufacturing processes

Wastes that are generated at the facility consisted of wastewater and sludge from the on-site wastewater treatment system. The wastewater is discharged to the Wyoming Valley public sewer under a Permit-By-Rule status.

III. Summary of Environmental History

Reilly submitted their first Notification of Hazardous Waste Activity on July 9, 1980. The notification listed the facility as a generation and treat/store/dispose (TSD) facility for F001, F006, F007, F008, and F009 hazardous wastes. On November 11, 1980, Reilly submitted a Part A Hazardous Waste Permit Application. The facility has been in operations since May 1970.

Methylene chloride and mineral spirits had been used in the manufacturing processes. In 1994, solvents were eliminated from the manufacturing processes by replacing them with

aqueous cabinet spray wash systems and the use of multiple dionized rinse system. In 1999, Reilly was selected as a 1999 recipient of a Governor's Award of Environmental Excellence. The award was granted based on Reilly's achievements in eliminating solvent use in their plating operations and plating improvements in relation to cyanide and chromium usage.

In an April 30, 2002, PADEP recognized Reilly for Strategic Goals Program at the bronze level. The bronze level was granted for attaining over 33% of the following goals in the year 2000:

- 1. Reduce water by 50%;
- 2. Reduce energy used by 25%
- 3. Reduce disposal of hazardous waste sludge by 50%
- 4. Reduce metal emissions to air and water by 50%;
- 5. Utilized 98% of metal purchased;
- 6. Reduce certain organic emissions by 90%; and
- 7. Reduce human exposure to chemicals.

On September 4, 2003, PADEP contractor performed an Environmental Indicator Inspection at the facility. The Solid Waste Management Units (SWMUs) at the facility include Wastewater Treatment System, National Pollution Discharge Elimination System Outfall, Waste Storage Area, Degreasing units, Drying Unit, and Air Emission Sources. There were no releases documented from these SWMUs.

On April 14, 2004, EPA determined that the facility had met both environmental indicators: (1) Current Human Exposures Under Control and (2) Migration of Contaminated Groundwater Under Control.

IV. Evaluation of EPA's Proposed Decision

EPA has determined that its proposed decision to make a Corrective Action Complete without Controls determination for 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 that notice is published in a local newspaper. Comments may be submitted by mail, fax, e-mail, or phone to Ms. Tran Tran at the address listed below.

A public meeting will be held upon request. Requests for a public meeting should be made to Ms. Tran Tran 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: Ms. Tran Tran, 3LC30 Phone: (215) 814-2079

Fax: (215) 814 - 3113 Email: <u>tran.tran@epa.gov</u>