



UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION III

STATEMENT OF BASIS

SAPA EXTRUSIONS  
CRESSONA, PENNSYLVANIA  
EPA ID# PAD096262522

Prepared by  
Office of Pennsylvania Remediation  
Land and Chemicals Division  
August 2014

## Table of Contents

Section 1: Introduction.....	1
Section 2: Facility Background.....	2
Section 3: Summary of Environmental History .....	3
Section 4: Environmental Indicators .....	4
Section 5: Public Participation.....	5
Index to Administrative Record.....	6

## Section 1: Introduction

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The United States Environmental Protection Agency (EPA) has prepared this Statement of Basis (SB) to solicit public comment on its proposed decision for the Sapa Extrusions facility located at 53 Pottsville Street, Cressona, Schuylkill County, Pennsylvania 17929 (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, EPA's proposed decision is that no further investigation or cleanup under the Corrective Action Program 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 other than continued compliance with the Consent Decree described under Section 2, below. 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.

Additionally, the Facility is subject to the Toxic Substances Control Act (TSCA), 15 U.S.C. §§ 2601 et seq., and TSCA's implementing regulations codified at 40 C.F.R. Part 761 et seq. These sections of TSCA and its implementing regulations address the production, importation, use, and disposal of poly-chlorinated biphenyls (PCBs).

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 5, Public Participation, for information on how you may review the AR.

## Section 2: Facility Background

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The Facility property consists of approximately 100 acres and is surrounded by a small residential development to the north, railroad tracks and commercial development to the east, and the West Branch of the Schuylkill River to the west and south. A location map and Facility diagram are attached as Figures 1 and 2, respectively.

The Facility was built by the federal government in the early 1940s to process munitions. The Aluminum Company of America (Alcoa) operated the Facility as Cressona Works from 1946 until it closed in 1977 due to labor disputes. The Facility reopened in 1979 as Cressona Aluminum Company. In 1996, Alumax Semi-Fabricated Products Group acquired the Facility and renamed it Alumax Extrusions, Inc. Alcoa acquired Alumax in 1998 and renamed the Facility Alcoa Extrusions. Alcoa merged with Sapa in 2007 and the Facility was renamed Sapa Extrusions. Since 1946, the Facility has produced and marketed aluminum ingot, billet, and slab, and has fabricated value-added aluminum products for the transportation, distribution, building and construction, and, more recently, solar and renewables markets.

In July 1987, PCB contamination was discovered in dewatered wastewater treatment plant sludges as high as 1145 ppm. Subsequent investigations confirmed PCB contamination in the wastewater treatment plant tank, surrounding soils, and in associated lagoons and soils around the lagoons.

In 1993, EPA brought two enforcement actions against the Facility: a TSCA administrative complaint that was settled in April 1993, and a multimedia civil judicial action in response to the Facility's improper use, storage, and disposal of PCBs and to violations of its National Pollutant Discharge Elimination System (NPDES) permit effluent limitations for Total PCBs, Oil and Grease, pH, and cyanide. This civil action ended in a Consent Decree to remediate PCB contamination at the Facility, comply with NPDES permit limits, and pay a penalty for violations of the Clean Water Act.

After the discovery of PCB contamination, components of the wastewater treatment plant were cleaned several times, existing equipment was upgraded, and additional treatment equipment was added to minimize or prevent PCB contamination in plant effluent. Since 1996, the Facility has generally been in compliance with their NPDES permit.

Four lagoons installed in the 1970s and 1980s to dispose of wastewater treatment plant sludge were remediated and closed in 1995. From 1994 to 1995, sludge and PCB-contaminated soil from these lagoons were removed and properly disposed off-site. EPA approved the remediation and closure of the lagoons in January 1996.

Other efforts to remediate PCB contamination at the Facility include removal

Statement of Basis

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of the upper floor layer throughout the main building, cleanup and repair of drain and sewer systems, and subsequent sampling to confirm contaminant levels were below action levels. More detailed information on PCB cleanup efforts undertaken at the Facility are beyond the scope of this Statement of Basis but can be found in the January 2003 Environmental Indicator (EI) Inspection report or, more particularly, in documents submitted to EPA in accordance with the Consent Decree under TSCA.

### Section 3: Summary of Environmental History

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Based upon information in the 2003 EI Inspection Report, EPA identified several Areas of Concern (AOCs) at the Facility, most of which had a history or evidence of only PCB contamination. The table below describes the AOCs as well as the post-investigation status. Complete details, including sampling data, can be found in the individual reports which are listed in the Index section of this SB and located in the AR. Sampling included soil and groundwater and covered the AOCs identified by EPA at the Facility. Target screening levels were determined to be EPA Region 3's Residential Regional Screening Levels (RSLs) for contaminants in soil, and EPA's Maximum Contaminant Level (MCL) national primary drinking water standards for contaminants in groundwater.

Areas of Concern	Description	Current status
Hazardous Waste Storage Area	Located on far western side of Building 122. Primarily used to store spent degreasing/cleaning solvents that have been mixed with waste oil and managed as residual waste.	Top layer of floor removed as part of PCB remediation; upgraded to steel plate floor with 6" cofferdam for spill containment. No further action required.
Caustic Cleaning Area (Building 124)	Caustic sodium hydroxide solution used to clean aluminum residue from extrusion dies and tools. When no longer effective, waste solution is transferred to holding tanks and used to neutralize low-pH wastewater in Wastewater Treatment Plant. Leaks from this area eventually drain to common sump that provides influent to Wastewater Treatment Plant.	Remediation of PCB contamination in this area continues under Consent Decree. Equipment upgraded in late 1990s to reduce amount of caustic used.
Mill Extrusion Department (Building 106)	Located within eastern portion of main building, this area of primary operations contains various large pieces of hydraulic equipment. Primary area of PCB contamination is located beneath Stretcher 17 area, located near center of Building 106. Documented releases (July 1987, March 2001) of waste oil to West Branch of Schuylkill River have occurred from three waste oil storage tanks in this area.	Remediation of PCB contamination in this area continues under Consent Decree. Sampling of downgradient wells for VOCs and metals in 2011 revealed no impacts indicative of subsurface contamination due to waste oil releases.

Small Parts Dip-Tank Locations (10 tanks)	Located in five areas of Facility and used to clean metal parts. Around 1987, nonhazardous solvents began to be used (previous solvent was hazardous due to methylene chloride content). Spent solvents are mixed with various waste oils and managed as residual waste prior to off-site disposal.	No evidence of spills or releases observed or reported.
No.2 Fuel Oil Tank Areas	One inactive 120,000-gallon aboveground storage tank (AST) located at eastern end, one inactive 240,000-gallon AST at southeastern end, and one active 20,000-gallon AST at northern end of Facility. Oil sheen and fuel oil odor at Outfall 008 in January 2001 suspected to be from underground fuel line leak near 120,000-gallon AST. Investigation in February 2001 included 11 soil borings analyzed for fuel oil VOCs.	All VOCs are below EPA's soil RSLs. Fuel oil lines suspected of leaking are no longer used and tank is inactive. No further action required.
Overall Groundwater	Sampling performed in 2011 at EPA request to determine whether historic impacts to groundwater occurred from areas discussed above.	All VOCs and metals are below EPA's MCL drinking water standards.

In summary, concentrations of hazardous constituents identified in the soil other than PCBs are within EPA's Regional Screening Level risk range for residential use; and concentrations of hazardous constituents identified in groundwater other than PCBs are below EPA's Maximum Contaminant Level national primary drinking water standards. Therefore, there are no unacceptable risks to human health or the environment from hazardous constituents other than PCBs at this Facility. Remediation of PCB contamination at the Facility continues in accordance with the Consent Decree under TSCA.

## Section 4: Environmental Indicators

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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 November 21, 2002.

## Section 5: Public Participation

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Before EPA makes a final decision on its proposal for the Facility, the public may participate in the decision 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. 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 warrants 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: 8/27/14

/John A. Armstead/

John A. Armstead, Director  
Land and Chemicals Division  
US EPA, Region III

Statement of Basis

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## **Index to Administrative Record**

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Consent Decree, in the U.S. District Court for the Eastern District of Pennsylvania, United States of America v. Cressona Aluminum Company, Inc., Civil Action No. 92-5212, March 29, 1993.





Letter from Daniel Lewis to Kevin Walker re: Soil Investigation – Alcoa Extrusions, Inc., Spotts Stevens and McCoy, March 6, 2001.

RCRA Site Inspection Report – Alcoa Extrusions, Inc., US Army Corps of Engineers, January 2003.

December 2011 Annual Groundwater Monitoring Report – Sapa Industrial Extrusions, URS Corporation, March 2012.



Stevens and McCoy, Inc.  
345 N. Wyomissing Blvd.  
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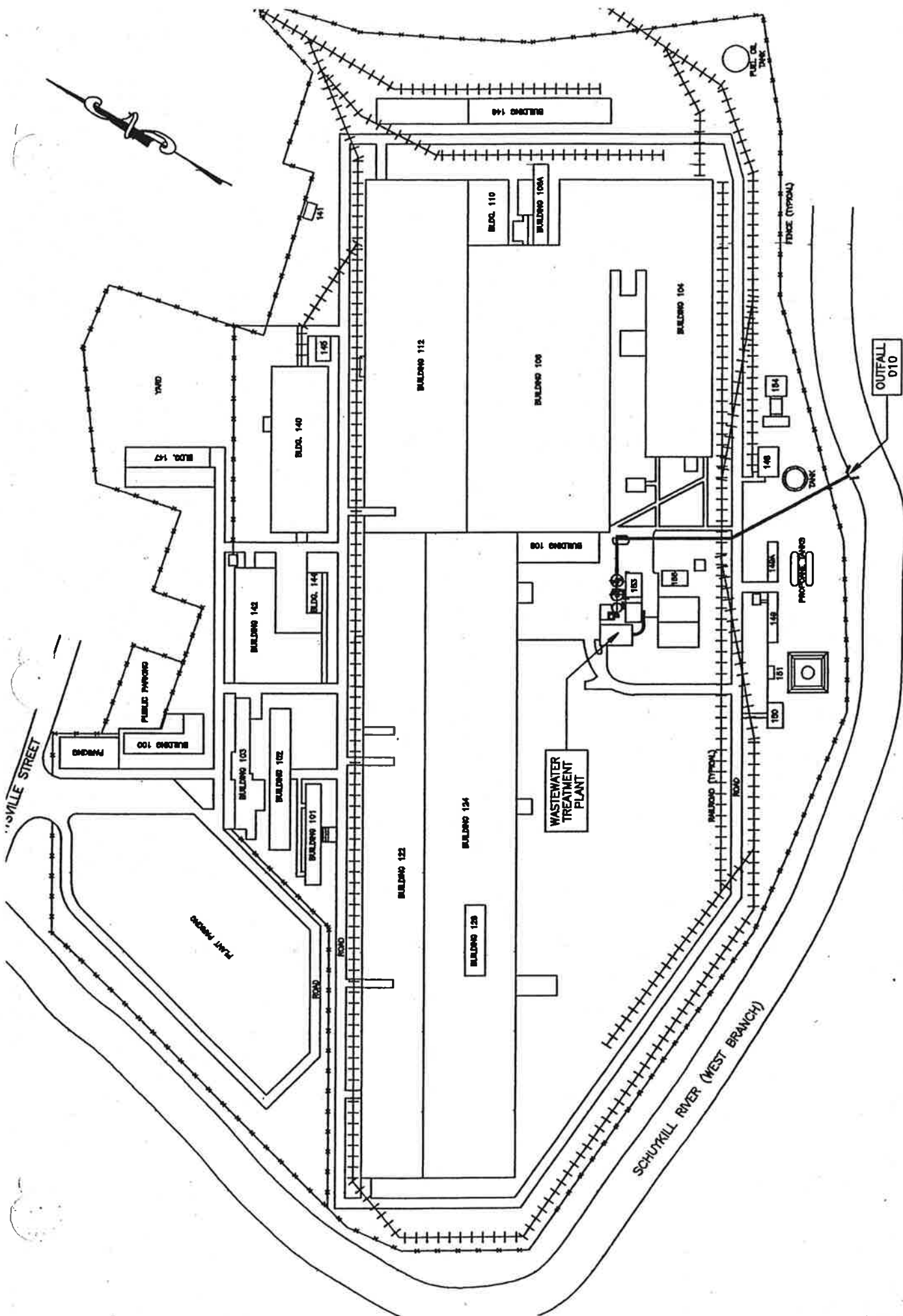
-  Streams
-  Watershed Boundaries
-  Non Verified Wells
-  Field Verified Wells



0 0.2 0.4 0.6 Miles

**Figure 1**  
**Site Location Plan**  
**Alcoa Extrusions, Inc.**  
**Cressona, Pennsylvania**

**Attachment 4**



**TSD ENVIRONMENTAL SERVICES, INC.**  
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**CRESSONA ALUMINUM Co.**  
 FACILITY LAYOUT SITE DIAGRAM

SITE.DWG