

UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY

REGION III

STATEMENT OF BASIS

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HODGE FOUNDRY, INC.

GREENVILLE, PA 16125

EPA ID # PAD 004 323 796

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## **I. Introduction**

The United States Environmental Protection Agency (EPA) has prepared this Statement of Basis (SB) to propose a Corrective Action Complete Without Controls determination as the final remedy for the facility owned by Hodge Foundry, Incorporated and located at 42 Leech Road, Greenville, Pennsylvania (the Facility). A "Corrective Action Complete Without Controls" determination means EPA believes that no further actions to remediate soil and groundwater contamination are necessary because levels of contamination in soil and groundwater are protective of human health and the environment under residential use.

This SB summarizes information that can be found in greater detail in the workplans and reports submitted by the Facility to EPA and PADEP. To gain a more comprehensive understanding of the RCRA activities that have been conducted at the Facility, EPA encourages the public to review these documents, which are found in the Administrative Record. The Administrative Record is located at the EPA Region III Office. The SB, Index for the Administrative Record, and Administrative Record are available for review at the Greenville Area Public Library located as follows:

**Greenville Area Public Library  
330 Main Street, Greenville, PA 16125  
Phone: (724) 588-5490**

**Hours: Tuesday, Wednesday & Thursday: 10:00 am - 8:00 pm  
Friday & Saturday: 10:00 am - 4:00 pm  
Sunday & Monday: Closed**

EPA is proposing a Corrective Action Complete Without Controls determination for the Facility, but has not made a final decision. The public is encouraged to participate in the remedy selection process by reviewing this SB and documents contained in the Administrative Record and submitting written comments to EPA during the public comment period. Public participation is discussed in more detail in Section IX, below. After EPA has considered all information submitted during the public comment period, EPA will make a final remedy decision and address all significant comments submitted during the public comment period in a Final Decision and Response to Comments. If EPA determines that new information or public comments warrant a modification to its proposed decision, EPA will modify the proposal or select other remedial alternatives based on such new information and/or public comments.

## **II. Facility Background**

Hodge Foundry is located on eight acres of land in northeast Greenville, Mercer County, Pennsylvania. It is bordered on the east by Leech road and small residential neighborhood. The Little Shenango River borders the site to the west, flowing south at the base of a steep slope along a railroad track. South of the site is a wooded lot. A perennial stream flows counter-clockwise

around the site from a point approximately 1,000 yards northwest of the facility at the base of the sand and slag filled slope and then the northern and western boundary of the property. This stream is the primary receiving water for the site runoff. The stream continues beyond the southern boundary of the Foundry property before turning westerly and passes under the access road and railroad tracks through an engineered culvert and flows into the Little Shenango River through an outfall. This outfall is regulated by an NPDES permit (Permit Number PAR208317) and is sampled twice a year. The Little Shenango River flows into the Shenango River approximately three-quarters of a mile further downstream. A surface water intake is located approximately 1.8 miles downstream of the site on the Little Shenango River. The Greenville Mercer Water District draws water from this intake which serves approximately 9,000 people. The Shenango River flows for about fourteen miles before running into a reservoir created there by a dam.

Hodge Foundry, Inc. has either owned and/or operated this facility since 1946. In 1983, Koppers Company, Incorporated, of Baltimore, MD, purchased the facility from Hodge Foundry but Hodge Foundry continued to operate the facility until 1987, when Hodge Foundry repurchased the facility from Koppers Company.

Hodge Foundry has manufactured gray and ductile iron castings since 1946. The process involves patterns that are packed in sand. When the sand is removed, the void that is created is filled with molten iron. When the iron cools, the casting is freed from the sand. The process' by-products, waste sand and slag, were landfilled on-site before December 1980. After 1980, Hodge Foundry established storage areas for its waste product and currently ships all the material offsite.

Since 1946, foundry wastes including foundry sand and furnace and ladle slags were disposed onsite until some time during the 1980s. The raw materials used in the foundry's processes include scrap iron and steel and various alloying materials such as copper, silicon, manganese, magnesium, furan, and refractory materials. Furan is used in the process as a binder in foundry sand. The facility once used to use phosphoric acid as a catalyst for foundry sand binders, however, in 1998-1999, the facility stopped using phosphoric acid and began using toluenesulfonic acid (TSA).

The foundry submitted a Notification of Hazardous Waste Activity in August and a Hazardous Waste Permit Application in November 1980. The application listed Hodge Foundry as generating and storing hazardous wastes U013, U124 (waste furan), and D007 (chromium). In 1983, Hodge Foundry filed a closure plan with the Pennsylvania Department of Environmental Protection. The foundry then modified its notification of Hazardous Waste Activity to be classified as a hazardous waste generator only. Hazardous wastes listed as being generated include D001, D002, and D007. In 1987, Hodge Foundry resubmitted a Notification of Hazardous Waste Activity Form to be reclassified as a small quantity generator. Refractory material containing chromium was not used at the site after 1987.

The wastes generated at Hodge Foundry included foundry sand, sand reclaim baghouse waste, shot blast baghouse waste, ladle slag, furnace slag, pattern coating sweepings, refractory waste, and permenete 165. All waste streams, except permanete 165, were non-hazardous wastes. Permenete 165 was found to contain chromium above the RCRA guidelines and was classified as hazardous waste D007.

### **III. Solid Waste Management Units (SWMUs)**

The solid waste management units at Hodge Foundry include Process Area, Former Foundry Sand and Slag Waste Disposal Area, Sand/Slag/Dust Storage Areas, Hazardous Waste Storage Area, Former 4,000-gallon Diesel Fuel underground storage tank (UST), Former Hydraulic Oil UST, Safety Kleen Parts Washer Area, Drums and Debris Site, Above Ground Storage Tank Areas, and Former Waste Oil Tanks Area.

The Former Sand and Slag Waste Disposal Area went through a closure process that involved an installation of capping and erosion control measures, an engineered drainage pathway, and an installation of a groundwater monitoring network, in accordance with a PADEP approved closure plan. In 1993, PADEP released Hodge Foundry from groundwater monitoring requirements.

The former Diesel Fuel UST was closed on December 8, 1997 by Klinginsmith Construction Co. The former Hydraulic Oil UST was closed on January 6, 1994 by EGC, Inc.. The Former Waste Oil Tanks Area (one 550-gallon UST and one 550-gallon AST) was closed on 11/19/1990 by Petroclean, Inc. (EPA January 2002 EI Inspection Report).

There were no releases documented at the Process Area, Sand/Slag/Dust Storage Area, Safety Kleen Parts Washer Area, Drums and Debris Site, Hazardous Waste Storage Area, and Above Ground Storage Tank Area.

### **IV. Summary of RCRA Facility Investigation (RFI)**

#### GROUNDWATER

On June 3-5, 2003 groundwater samples were collected at Hodge Foundry facility by Tetra Tech FW, Inc. The samples were analyzed for metals, cyanide and polyaromatic hydrocarbons (PAHs).

Groundwater samples were collected from ungradient well MW-1, and downgradient wells MW-2A, MW-2B, MW-3A, and MW-3B. Arsenic was detected in MW-1, MW-2B, MW-3A, MW-3B in unfiltered samples at concentrations of 53.7, 34.2, 37.9, and 76.7 ug/kg, respectively. Arsenic was detected in filtered groundwater samples of MW-1, MW-2A, MW-2B, MW-3A, and MW-3B at concentrations as high as 63.3 ug/l (part per billion). The Maximum Contaminant Level (MCL) for arsenic established by the Safe Drinking Water Act, 42 U.S.C. Section 300g-1 is 10 ug/l. PADEP has determined that continued detection of arsenic in groundwater was a naturally occurring phenomenon and arsenic found in the groundwater samples is not from the

releases from the Facility. Cyanide and PAHs were not found in groundwater samples. A copy of the Facility site sketch showing locations of the SWMUs and the monitoring wells is attached (Attachment 1).

## SOIL

On June 3-5, 2003 soil samples were collected at Hodge Foundry facility by Tetra Tech FW, Inc. The samples were analyzed for metals, cyanide and PAHs. Metals and PAHs in soil samples were detected at concentrations below the Pennsylvania Residential standards. PAHs were also detected in soil samples at concentrations below the EPA Region III Migration to Groundwater Soil Screening Levels (SSLs) (DAF 20). Cyanide was not found in soil samples.

## **V. Proposed Final Remedy**

EPA is proposing a Corrective Action Complete without Controls determination as the final remedy for the Facility. EPA believes that no further action to remediate soil or groundwater are required at the Facility. Levels of contamination in soil and groundwater are protective of human health and the environment under residential use.

## **VI. Institutional Controls**

Institutional controls are not required. The levels of contamination in soil and groundwater are below the Pennsylvania Residential Cleanup Criteria and the EPA's Migration to Groundwater SSLs (DAF 20) and are protective of human health and the environment under residential use.

## **VII. Financial Assurance**

EPA has evaluated whether financial assurance for corrective action is necessary to implement EPA's proposed remedy at the Facility. Given that EPA's proposed remedy does not require any further actions to remediate soil or groundwater, EPA is proposing that no financial assurance be required.

## **VIII. Environmental Indicators**

Under the Government Performance and Results Act (GPRA), EPA has set national goals to address RCRA corrective action facilities. Under GPRA, EPA evaluates two key environmental clean-up indicators for each facility: (1) Current Human Exposures Under Control and (2) Migration of Contaminated Groundwater Under Control. Hodge Foundry is one of Region III's high priority facilities and falls under GPRA. On August 26, 2002, EPA determined that the Facility had met both environmental clean-up indicators.

## **IX. Public Participation**

EPA is requesting comments from the public on its proposal to select a Corrective Action Complete Without Controls determination as the final remedy for the Facility. On March 24, 2008, EPA placed an announcement in the local newspaper, the Record Argus, to notify the public of the availability of this Statement of Basis, its supporting Administrative Record and the public's opportunity to request a public meeting on EPA's proposed corrective action for the Facility. The public comments period will last thirty (30) calendar days from the date that this matter is publicly noticed in a local paper. Comments should be sent to EPA in writing at the EPA address listed below, and all commentors will receive a copy of the final decision and a copy of the response to comments.

A public meeting will be held on request. Requests for a public meeting should be made to Ms. Tran Tran of the EPA Regional Office at the address listed below or at 215-814-2079.

The Administrative Record contains all information considered when making this proposal. The Administrative record is available for review during business hours at the two following locations:

U.S. Environmental Protection Agency  
Region III (3WC22)  
1650 Arch Street  
Philadelphia, PA 19103  
Contact: Tran Tran  
Phone: 215-814-2079  
Fax: 215-814-3113  
E-mail: [trantran@epa.gov](mailto:trantran@epa.gov)

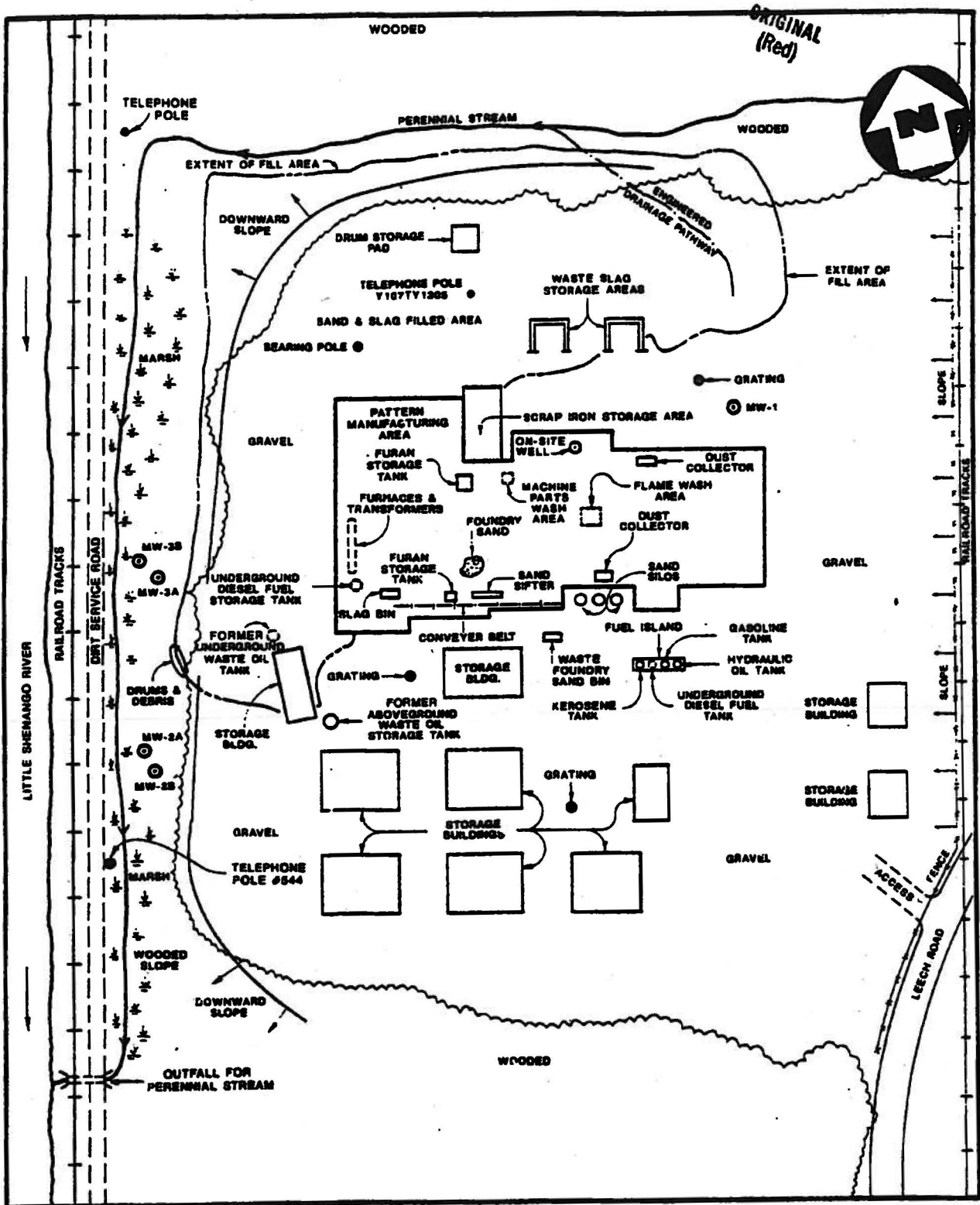
Greenville Area Public Library  
330 Main Street, Greenville, PA 16125

Following the thirty day public comment period, EPA will prepare a Final Decision and Response to Comments in which it will identify the selected remedy for the Facility. The Response to Comments will address all significant written comments and any significant oral comments generated at a public meeting if a meeting is held. The Final Decision and Response to Comments will be made available to the public. If, on the basis of such comments or other relevant information, significant changes are proposed to be made to the remedy for the Facility as proposed by EPA in this Statement of Basis, EPA will seek additional public comments on any proposed revised remedy.

**ATTACHMENT 1**

**SITE SKETCH**





**SITE SKETCH**  
**HODGE FOUNDRY INCORPORATED**  
 (NO SCALE)

FIGURE: 2.2

