

RCRA Corrective Action Statement of Basis & Public Comment Period

June 2021

Facility Name: Superior Forge and Steel Facility

U.S. EPA I.D.: OHD 987 033 131

Location:

1820 McClain Road Lima, Ohio 45804

Activity:

RCRA corrective action Statement of Basis for the remedies selected.

Comment Period:

June 24, 2021 – August 6, 2021

Submit Comments to:

Submit written comments by email to Publiccomment@epa.ohio.gov and indicate the comments concern the Superior Forge and Steel, Statement of Basis.

Superior Forge and Steel Facility



What does the facility do?

Superior Forge and Steel Corporation (SFS) is a fully integrated steel roll supplier. The Facility covers approximately 36.68 acres of land and consists two parcels. Operations mostly take place on the main 34.27-acre parcel which contains the boiler house, steel casting area and machine shop, forge, and storage buildings. The western parcel is 2.41 acres and contains the Induction Hardening Building.

What is the Statement of Basis?

The Statement of Basis is the document which describes the process Ohio Environmental Protection Agency (Ohio EPA) uses under the Resource Conservation and Recovery Act (RCRA) to select measures for containing or cleaning up a hazardous waste management facility. This Statement of Basis will be public noticed and will allow the community to review and provide comments to Ohio EPA. If any public comments are received, they will be addressed by Ohio EPA and a responsiveness summary will be issued to the public. A Decision Document will then be issued by the Director of Ohio EPA.

What is the history of corrective action at the facility?

In February of 2018, Haley & Aldrich, INC. (HA), a contractor to SFS, prepared a RCRA Facility Current Conditions Report (CCR) as the product of the Facility Assessment (FA) for the Lima facility. From the CCR, HA identified 15 Areas of Interest (AOIs) on both properties. All 15 of

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these AOIs were located on the main manufacturing property. Of these 15 AOIs, HA determined that 13 needed further investigation under a RCRA Facility Investigation (RFI). On September 30, 2020, SFS submitted to Ohio EPA a RCRA Facility Investigation (RFI) Report for its facility. Revisions to the RFI Report were received on March 12, 2021. The CCR and RFI Report were prepared as part of RCRA Corrective Action activities being voluntarily initiated at the Facility by SFS in cooperation with the Ohio EPA.

As described in the CCR, the principal sources of Facility-related contamination are associated with raw materials and wastes generated by Facility operations and subsequent handling of those materials. The RFI results indicated that, the majority of AOIs do not exhibit evidence of contamination (i.e., constituents were either not detected, or were detected at concentrations below risk-based screening levels used to delineate the nature and extent of contamination), with a few exceptions, as detailed below. The other exception to this is AOI-08, where several metals were detected in surface soil at concentrations above the RFI screening levels. In AOI-08, soil boring SB08-04 had exceedances of the screening criteria for arsenic (much higher than other soil samples collected on-site), hexavalent chromium, lead, manganese and thallium in the 0 to 2 feet interval, and a soil sample from the boring to emplace monitoring well MW-06 had an exceedance for hexavalent chromium in the 0 to 2 feet interval. These results are shown in databoxes on Figure 6 of the RFI report. Soil boring SB08-04 and MW-06 are located roughly where the dark area was observed in the 1989 aerial photograph, which was suspected to be a temporary baghouse dust storage area from the late 1980's, prior to SFS ownership.

Pursuant to discussions with the Ohio EPA, as detailed in a letter dated 29 January 2020, supplemental soil samples were collected from four additional soil points immediately surrounding the SB08-04 location, where

preliminary risk assessment indicated this small area posed a potential unacceptable future risk represented by an area of about 10-feet by 10-feet surrounding this point. Contingency samples from additional step-out borings representing a 20-feet by 20-feet square were also collected; only the two eastern-most of these needed to be analyzed to help delineate elevated detections of manganese and arsenic. Two samples were also re-collected from the original SB08-04 location to better define the depth of these elevated detections.

The new data were re-analyzed in the HHRA and identified that the shallow soil sample at SB08-04 was the only point that represented a potential unacceptable future risk. Given the small area of impacted soils around SB08-04, the facility conducted an interim remedial measure by soil excavation of an approximately 10-feet by 10-feet by 2-feet deep area. Remedial measures documentation is contained in Appendix D of the RFI report.

As summarized in Section 6 of the RFI report, following completion of the AOI-08 remediation, the risk estimates do not indicate that further Interim or Corrective Measures are warranted (other than institutional controls to maintain industrial/commercial land use on Facility and to prohibit use or extraction of overburden ground water on the Facility for any purpose, including, but not limited to: human or animal consumption, gardening, industrial processes, or agriculture, except that ground water may be extracted in conjunction with environmental investigation, remediation activities, dewatering wells, and/or water extracted for purposes of building construction and maintenance of infrastructure). Institutional controls will be implemented through a Restrictive Covenant. It should be noted that there is no plan to alter the Facility use in the foreseeable future and the Facility currently uses municipal water.

In typical RCRA CAs, an RFI concludes by identifying the need for corrective measures,

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which leads to a Corrective Measures Study (CMS). However, the March 2021 revised RFI concluded that no further corrective action measures should be required at the SFS facility and that a CMS would not be necessary. The IMs were intended to serve, in part, as a final remedy for the site, and an environmental covenant will be considered as the other components of the final remedy. Ohio EPA concurs with the findings of the RFI.

What would the Statement of Basis allow the facility to do?

This Statement of Basis concludes that no further corrective action should be required at the facility besides an environmental covenant. The environmental covenant will restrict land use to commercial/industrial use only, prohibit potable use of ground water.

What is the regulatory basis to support this Statement of Basis?

The regulatory basis is part of the Corrective Action obligations under OAC-3745-54-101. Accordingly, Ohio EPA is issuing a draft action indicating the Director's intention with respect to the issuance of a Final Decision Document to SFS for the implementation of the remedies summarized.

Who can I contact for more information?

For additional information, please contact Brian Patterson at brian.patterson@epa.ohio.gov or (419) 373-3133.

What is the history of the hazardous waste program?

RCRA, an amendment to the Solid Waste Disposal Act, was passed in 1976. The main reason for the amendment was to address the growing volume of municipal and industrial solid waste generated across the United States. A few goals established by RCRA include: to protect human health and the

environment from potential hazards of waste disposal, to reduce the amount of waste generated, and to ensure that waste produced are managed in an environmentally sound manner.

When RCRA was written, U.S. Congress' intent was for the states to assume primary responsibility for implementing the hazardous waste regulations with oversight from the U.S. EPA. U.S. EPA must approve each state as an authorized state. To become an authorized state, each must demonstrate that the state program is at least equivalent to and consistent with federal laws, provides adequate enforcement authority and provides availability of information similar to the federal program. Since 1989, the State of Ohio has been an authorized state by U.S. EPA for the majority of their hazardous waste program.

How can I become more involved?

The comment period begins on June 24, 2021 and ends on August 6, 2021. Copies of the statement of basis and other pertinent documents are available for review by the public at the following locations:

The statement of basis is available for review by the public online on Ohio EPA's website under the "What's New" tab at:

<https://www.epa.ohio.gov/derr/>

After the close of the public comment period, Ohio EPA will review all comments received and decide whether to issue the RCRA Corrective Action Decision Document based on the Statement of Basis. If there is significant interest in a public meeting, an announcement will be made on Ohio EPA's website (<https://www.epa.ohio.gov/derr/>) giving direction on how to attend a virtual public meeting. . The final Decision Document will include a notification to those who submitted written comments during the official comment period. Ohio EPA will also prepare and send to all responders a document answering significant comments. Within 30 days of a final decision,

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any person who submitted written comments may petition Ohio EPA's Environmental Review Appeals Commission Board to review the decision.