

## STATEMENT OF BASIS

International Metals Reclamation Company (INMETCO)  
Ellwood City, Pennsylvania  
EPA ID# PAD 087 561 015

### I. INTRODUCTION

This Statement of Basis (SB) sets forth the United States Environmental Protection Agency's (EPA) proposed decision concerning the need for corrective action at INMETCO located in Ellwood City, Pennsylvania (Facility) at this time. The corrective action program is designed to ensure that facilities have investigated and cleaned up any releases of hazardous waste and hazardous constituents that may have occurred at their property.

EPA is issuing this SB consistent with public participation provisions of the Resource Conservation Recovery Act (RCRA). EPA will make a final decision after evaluating any information received during the public comment period.

EPA is proposing no further corrective action at this time at the Facility. The proposal is based on EPA's Environmental Indicator (EI) inspection and evaluation, which encompassed a site visit and a comprehensive review of the existing information to assess current environmental conditions at the Facility. EPA has determined that there have been no past or current releases that warrant further investigation or corrective action at the Facility at this time. Should new information in the future reveal the need for additional investigation or remediation, EPA will proceed accordingly.

### II. FACILITY BACKGROUND

INMETCO is a subsidiary of "INCO" (The International Nickel Company) and is located approximately 35 miles northwest of Pittsburgh in Ellwood City Pennsylvania. The property is approximately 92 acres. It is the former site of the U. S. Steel Ellwood City Tube Mill, which closed in 1975. In 1978, INMETCO purchased the property and began operations.

The Facility recycles wastes predominately from stainless steel manufacturers that include mill scale, swarf and flue dusts. To a lesser extent, the Facility also recycles Ni-Cd batteries, carbon refractories and other nickel, chromium, iron, molybdenum and cadmium bearing wastes. The recycled wastes are used to produce chrome and nickel steel alloy ingots and pellets. INMETCO uses a High Temperature Metal Recovery (HTMR) Process that allows the wastes to be recovered, reclaimed and recycled. The Facility produces approximately 25,000 tons of remelted alloys annually. The recycled alloy is marketed to the specialty steel industry.

### III. EPA INSPECTION, EVALUATIONS AND CONCLUSIONS

As part of the Environmental Indicator (EI) inspection and evaluation for Current Human Exposures and Migration of Contaminated Groundwater, a comprehensive record search and review were conducted by the EPA and the U.S. Army Corps of Engineers (COE). This undertaking consisted of evaluating the Facility's manufacturing operations and waste management practices, RCRA permit applications, historical spills and releases, documentation of previous site inspections, RCRA closure activities and correspondence between the EPA, the Pennsylvania Department of Environmental Protections (PADEP) and the Facility.

On July 2000, the EPA along with the PADEP and the COE conducted a site visit. The visit consisted of a plant tour and information gathering to assess the current status of the Facility. No obvious areas of concern were identified during the visit. Based on the comprehensive review of existing records and the site visit, EPA has determined that both EIs are under control (i.e., there is no contamination problem that creates an unacceptable risk to human health nor is there any evidence of groundwater contamination caused by the Facility). Moreover, EPA concludes that there have been no past or current releases that warrant further investigation or corrective action at the Facility at this time. Therefore, EPA proposes that no further corrective actions are necessary at the Facility at this time.

## V. PUBLIC PARTICIPATION

EPA is requesting comments from the public on its proposal to require no further corrective action at the Facility at this time. The public comment period will last forty-five (45) calendar days after the public notice first appears in the Ellwood City Ledger on December 11, 2002. Comments may be sent to EPA in writing at the address listed below.

A public hearing will be held upon request. Requests for a public hearing should be made to Mr. Khai M. Dao of the EPA Regional Office (215-814-5467) or Sigma Toth of the PADEP (814-332-6843). A hearing will not be scheduled unless one is requested.

The Administrative Record contains all information considered by EPA when making this proposal not to require further corrective measures at the Facility at this time. The Administrative Record is available at the following location:

U.S. EPA Region III  
1650 Arch Street  
Philadelphia, PA 19103  
Hours: Mon-Fri, 8:00 AM - 4:30 PM  
Contact: Khai M. Dao  
Voice: (215) 814-5467  
Fax: (215) 814-3110  
E-mail: dao.khai@epa.gov

EPA may modify its decision not to require corrective measure based on new information and/or public comments. Therefore, the public is encouraged to review the Administrator Record, and comment on the proposed decision presented in this document. Written comments to EPA must be

received within the 45-day period ending on January 25, 2003.

Following the forty-five (45) calendar day public comment period, EPA will prepare a final decision which will address all written comments and any substantive comments presented verbally at the public hearing. This final decision will be incorporated into the Administrative Record. If the comments are such that significant changes are made to this proposal, EPA will seek public comments on the revised proposal.