



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III

STATEMENT OF BASIS

HAMILTON PRECISION METALS, INC.
LANCASTER, PENNSYLVANIA
EPA ID No. PAD000800698

Prepared by
Office of Pennsylvania Remediation
Land and Chemicals Division
June 2012

Table of Contents

Section 1: Introduction.....	1
Section 2: Facility Background.....	1
Section 3: Summary of Environmental Investigation.....	2
Section 4: Environmental Indicators	3
Section 5: Public Participation.....	3
Index to Administrative Record.....	5
Attachment A: Figure 1, Facility Layout	

List of Acronyms

AST	Aboveground Storage Tank
COC	Contaminant of Concern
EI	Environmental Indicator
EPA	Environmental Protection Agency
HASP	Health and Safety Plan
MCL	Maximum Contaminant Level
MISS	Metals Impacted Soils and Sediment Area
MSC	Medium Specific Concentration
OSHA	Occupational Safety and Health Administration
PADEP	Pennsylvania Department of Environmental Protection
RCRA	Resource Conservation and Recovery Act
RSL	Regional Screening Level
SB	Statement of Basis
SC	Site Characterization
SHS	Statewide Health Standard
USBFMI	U.S. Bronze Foundry and Machine, Inc .
UST	Underground Storage Tank

Section 1: Introduction

The U.S. Environmental Protection Agency (EPA) has prepared this Statement of Basis (SB) in accordance with the Corrective Action Program to solicit public comment on its proposed remedy for the Hamilton Precision Metals, Inc. (HPM) facility located at 1780 Rohrerstown Road, Lancaster, Pennsylvania (the Facility or the Site). 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 is proposing no further corrective action or land use controls are necessary at this time at the Facility. EPA has determined that its proposed decision is protective of human health and the environment. This SB highlights key information relied upon by EPA in making its proposed decision.

The Facility is also 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 been investigated and that all releases of hazardous waste and hazardous constituents have been remediated. The Commonwealth of Pennsylvania (the 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.

The Administrative Record (AR) for the Facility contains all documents, including data and quality assurance information, on which EPA's proposed decision is based. The Index to the AR may be found at the end of the SB. See Section 5, Public Participation, for information on how you may review the documents contained in the AR and submit any comments you may have concerning EPA's proposed decision for the Facility.

Section 2: Facility Background

The Facility is located on approximately 15 acres and is situated within the limits of East Hempfield Township, west of the city of Lancaster. The property is bordered on the south and east by light industrial facilities and to the north by farms. The west side borders two large warehouses. One residential property is located directly north of the facility, and four residential properties are located across Rohrerstown Road, east of the facility. The Borough of East Petersburg is located approximately 0.4 miles northeast of the facility. The Facility layout is presented in Figure 1.

The HPM facility produces specialty strip and foil metal rolled to customer specifications for high-technology industries such as computers, telecommunications, surveillance, electronics, business machines, automotives, aircrafts, land/surface/submarine vessels, and spacecraft. HPM's main process is re-rolling metal strip, foil and ultra thin foil. The

Facility works with multiple alloy combinations (including titanium, nickel, copper, and brass) and re-sizes the metal rolls from a thickness of 0.060" (1.5 mm) to a minimum of thickness of 0.000060" (1.5 microns). The other operations at the facility include slitting, cleaning, pickling, annealing, and packaging. The finished products are used in multiple applications including, but not limited to: medical applications such as the outer covering of pacemakers, electrical component of resistors and circuit board components, and in fan blade components for jet engines and their associated housing in the aerospace industry.

Wastes generated from the Facility's operations consist of mainly acidic wastes from the metal pickling process. The acidic wastes are neutralized, filtered, and separated. The accumulated sludge is disposed offsite. The neutralized wastewater is discharge to the local sanitary sewer system. Until 2000, trichloroethylene (TCE) and 1,1,1-trichloroethane (1,1,1-TCA) were used in the vapor degreasing operations. The Facility has since switched to an aqueous degreaser. Prior to the change, TCE and 1,1,1-TCA solvent wastes were disposed offsite at a regulatory approved facility.

In 2007, HPM was acquired by Ametek, Inc. (Ametek), a global manufacturer of electronic instruments and electromechanical devices. The HPM facility continues to operate as a subsidiary company under Ametek.

Section 3: Summary of Environmental Investigation

In 2007 and as part of Ametek's due diligence to purchase the HPM facility, a Phase I Environmental Site Assessment and a Phase II Site Investigation (SI) were conducted by Environmental Resources Management (ERM) on behalf of Ametek. Based on the site assessment, the Phase II SI concentrated on seven Areas of Concern (AOCs) at the Facility. The seven AOCs consisted of the Mill Oil Aboveground Storage Tanks (ASTs), the former TCA/TCE Cleaning Operations, the Drum Storage Area, the former Underground Storage Tank (UST) Area, the former Septic System Leach Field, the Railroad Spur and the Pickling Room. The investigation evaluated soils and shallow groundwater on the property. Soil samples were collected using both a hand auger and direct push technology (DPT). Several temporary well points consisting of ¾ inch screened PVC pipe were installed to assess the shallow groundwater. In addition to the onsite groundwater investigation, EPA sampled five offsite residential groundwater wells in the vicinity of the Facility for organic and inorganic constituents.

The presence of low concentrations of volatile, semi-volatile organic compounds (VOCs & SVOCs) and metals were detected in groundwater on the property. However, none of the confirmed onsite and offsite groundwater results for VOCs, SVOCs and metals exceeded the EPA Maximum Concentration Limits (MCLs).

Surface and subsurface soil samples were collected and analyzed for VOCs, SVOCs, polychlorinated biphenyls (PCBs), and metals. PCBs were not detected in soil. None of the detected constituents in the soil samples exceeded the PADEP Residential Direct

Contact MSCs or the Residential Soil-to-Groundwater MSCs for used aquifers. Furthermore, the levels of constituents detected in soil meet EPA allowable risk range for direct contact for residential land use.

Section 4: Environmental Indicators

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. EPA has determined that the Facility met these indicators (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) on June 27, 2012.

Section 5: Public Participation

Before EPA makes a final decision on its proposed remedy 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 Index to the Administrative Record lists the documents and all information considered by EPA in reaching this proposed decision. The AR is available for public review during normal business hours at:

U.S. EPA Region III
1650 Arch Street
Mail code: 3LC30
Philadelphia, PA 19103
Contact: Khai M. Dao
Phone: (215) 814-5467
Fax: (215) 814-3113
Email: dao.khai@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 Khai M. Dao. EPA will hold a public meeting to discuss this proposed decision upon request. Requests for a public meeting should be made to Khai M. Dao.

EPA will respond to all relevant comments received during the comment period. If EPA determines that new information warrants a modification to the proposed remedy, EPA will modify the proposed remedy 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 remedy will receive a copy of the FDRTC. Others may obtain a copy by contacting Khai M. Dao at the address listed above.

Date: 7/2/12



Abraham Ferdas, Director
Land and Chemicals Division
US EPA, Region III

Index to Administrative Record

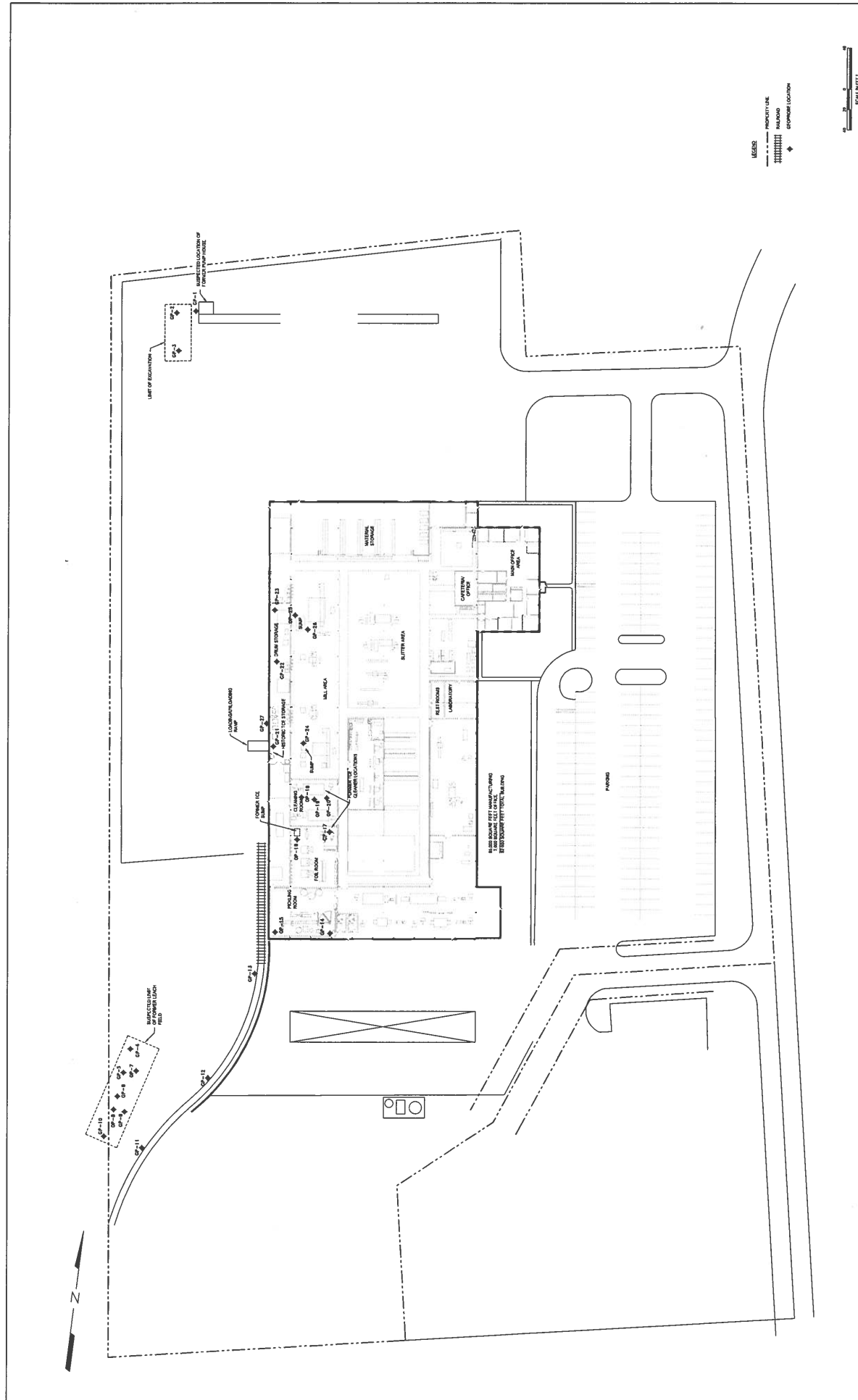
Subsurface Investigation Evaluation, Hamilton Precision Metals, Inc., Lancaster, PA, prepared by Clayton Environmental Consultants, October 1998.

Phase I Environmental Site Assessment, Hamilton Precision Metals, Inc., Lancaster, PA, prepared by Environmental Resources Management, May 2007.

Phase II Environmental Investigation Report, Hamilton Precision Metals, Inc., Lancaster, PA, prepared by Environmental Resources Management, June 2007.

Environmental Indicator Inspection Report, Hamilton Precision Metals, Inc., Lancaster, PA, prepared by Baker, June 2012.

Attachment A



NO.	DATE	APPL.	REVISION	NO.	DATE	APPL.	REVISION

CHECKED DESIGN ENGINEER	DATE	DATE
PROJECT ENGINEER		
PROJECT MANAGER		
APPROVED		

FIGURE 1		
SAMPLE LOCATION MAP		
SCALE	AS SHOWN	
DRAWN BY	DATE	
W.D. TORRES	06-21-07	
CHECKED FOR ACCURACY		
DATE		

AMETEK		DRAWING NO.
HAMILTON PRECISION METALS		
LANCASTER PENNSYLVANIA		
Environmental Resource Management		
Erie, Pennsylvania 19341 (610) 524-1500		
ERM		