



UNITED STATES

ENVIRONMENTAL PROTECTION AGENCY

REGION III

STATEMENT OF BASIS

MENASHA PACKAGING COMPANY – YUKON PLANT

SEWICKLEY TOWNSHIP, PA

EPA ID No. PAD 004330999

A. Introduction

The United States Environmental Protection Agency (EPA) has prepared this Statement of Basis (SB) for the Menasha Packaging Company facility located at Route 70, Sewickley Township, Westmoreland County, PA 15698 (hereinafter referred to as the Facility).

The Facility is subject to the 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. Sections 6901 to 6992k. The Corrective Action program is designed to ensure that certain facilities subject to RCRA investigate and clean up any releases of hazardous waste or hazardous constituents that could pose a threat to human health.

Information on the Corrective Action program and a fact sheet for the Facility can be found by navigating to <http://www.epa.gov/reg3wcmd/correctiveaction.htm>.

B. Proposed Decision

EPA's review of available information and a site visit conducted by the Pennsylvania Department of Environmental Protection (PADEP) on May 18, 2004 indicate that there are no unaddressed releases of hazardous waste or hazardous constituents from the Facility. Based on that assessment, our proposed decision is that no further investigation or cleanup is required. EPA's proposed decision meets the criteria for "Corrective Action Complete without Controls" set forth in EPA Guidance found in the Federal Register / Vol. 68, No. 37 / Tuesday, February 25, 2003 / Notices [FRL - 7454-7] pages 8757 to 8764.

EPA has determined that its proposed decision for the Facility is protective of human health and the environment and that no further corrective action or controls are necessary at this time.

C. Facility Background

The Facility is located at Route 70, Sewickley Township, Westmoreland County, Pennsylvania. The Facility is bordered to the northeast by Route 70, to the east by a residence, and to the southwest by the Sewickley Creek. Menasha has owned the site since 1980. Before 1980, the site was owned by International Paper Company. Prior to this, the property was used as farmland. The Facility covers 15.6 acres.

The facility manufactures a variety of corrugated packaging materials for use in many different industries. The facility corrugates paper into cardboard. The manufacturing processes include corrugating, cutting, slitting, printing, and gluing. In 1980, the facility filed a Hazardous Waste Permit Application, listing storage of chromium waste (D007) and lead waste (D008). On August 6, 1981, the facility was granted interim status to store chromium waste (D007) and lead waste (D008). Hazardous wastes generated at the facility included chromium waste (D007), lead waste (D008), and spent petroleum naphtha (D001).

On April 27, 1992, the facility filed a Notification of Hazardous Waste Activity that listed

generation of less than 220 lbs/month of ignitable waste (D001), corrosive waste (D002), barium waste (D005), and tetrachloroethylene waste (D039).

D. Summary of Environmental History

On May 18, 2004, PADEP performed an Environmental Indicator Inspection at the facility. The site visit included an overview of the solid waste management units (SWMUs). There are eleven SWMUs at the site: the glue-making area, glue-application area, former leaking oil drum, subsurface drainage system, former Abcor unit, wastewater treatment plant, former maintenance shop part washer, former degreaser rag disposal drum, old compressor room, residual waste roll-off, and former underground storage tanks. Of these 11 SWMUs, only the former underground storage tanks had a release to the environment.

The two former fuel oil underground storage tanks (Tank No.1 and Tank No. 2) were closed in 1988. The tanks were removed in June, 1988. Soil contamination was discovered during the removal of underground storage Tank No. 1. About ten cubic yards of visually contaminated soil were excavated. The excavated soil was disposed of at a PADEP-approved landfill. Two samples of groundwater infiltrating the Tank No. 1 excavation were collected. Petroleum hydrocarbons were not detected in the groundwater samples. The PADEP visited the site after removal of Tank No.1 and concurred with the work performed for removal of the soils affected by the product. A tanks closure report was submitted to PADEP.

On May 29, 2001, the facility notified PADEP that it had discovered that a sink in the facility was connected to a NPDES stormwater outfall and was inadvertently discharging wastewater to the outfall. The sink was removed from the service until the plumbing could be rerouted. The sink was redirected to the wastewater treatment plant by June 11, 2001. PADEP has investigated and determined that the unpermitted discharge has been corrected and that there were no significant impacts to surface water resulting from the discharge.

On February 18, 2011, EPA determined that the facility had met both environmental indicators: (1) Current Human Exposures Under Control and (2) Migration of Contaminated Groundwater Under Control. These determinations are available at <http://www.epa.gov/reg3wcmd/ca/pa.htm>

E. Public Participation

Interested persons are invited to 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. Comments may be submitted by mail, fax, e-mail, or phone to Ms. Tran Tran at the address listed below. EPA will hold a public meeting to discuss this proposed decision upon request. Requests for a public meeting should be made to Ms. Tran Tran at the address listed below.

EPA has developed an Administrative Record (AR) for this proposed decision which contains all information considered by EPA during the process. The AR is available at the following location:

U.S. EPA Region III
1650 Arch Street
Philadelphia, PA 19103
Contact: Ms. Tran Tran (3LC30)
Phone: (215) 814-2079

Fax: (215) 814-3113
Email: tran.trant@epa.gov

EPA encourages interested persons to participate in the remedy selection process by reviewing this SB and documents contained in the AR. The AR contains the complete information that EPA reviewed prior to this proposed decision.

EPA will address all significant comments received during the public comment period. If EPA determines that new information or public comments warrant a modification to the proposed decision, EPA will modify the proposed decision or select other alternatives based on the new information or comments. EPA will announce its final decision in a document entitled the Final Decision and Response to Comments (FDRTC). Any person who comments on the proposed decision will automatically receive a copy of the FDRTC. Any other persons desiring a copy of the FDRTC may obtain on by contacting Ms. Tran Tran at the address listed above.