



972811

Bway Corporation
Cincinnati, OH
Statement of Basis: Proposed Remedy
U.S. Environmental Protection Agency

March 2022

Purpose



- Provide background on the Bway Corrective Action Site
- Explain EPA's recommended Remedy for the site
- Share information on how to submit a public comment

How to Submit Comments



Deadline: April 8, 2022

The public may request a public hearing about this proposal, during which the public may submit written comments, ask questions, make statements, and otherwise discuss with EPA staff any concerns about or support for the approval. EPA will receive and document all comments sent between March 9, 2022, and April 8, 2022.

There are several different ways to submit comments on the proposed Statement of Basis:

- **By confidential voicemail** at 312-886-1660
- **By website**, directly at: <https://www.epa.gov/hwcorrectiveactionsites/epa-rcra-id-ohd004253225>
- **By email** to sundar.bhooma@epa.gov
- **By mail** to Bhooma Sundar, U.S. EPA Region 5, Mail Code-16 J, 7 W. Jackson Blvd.
Chicago, IL 60604-3590

EPA RCRA Corrective Action



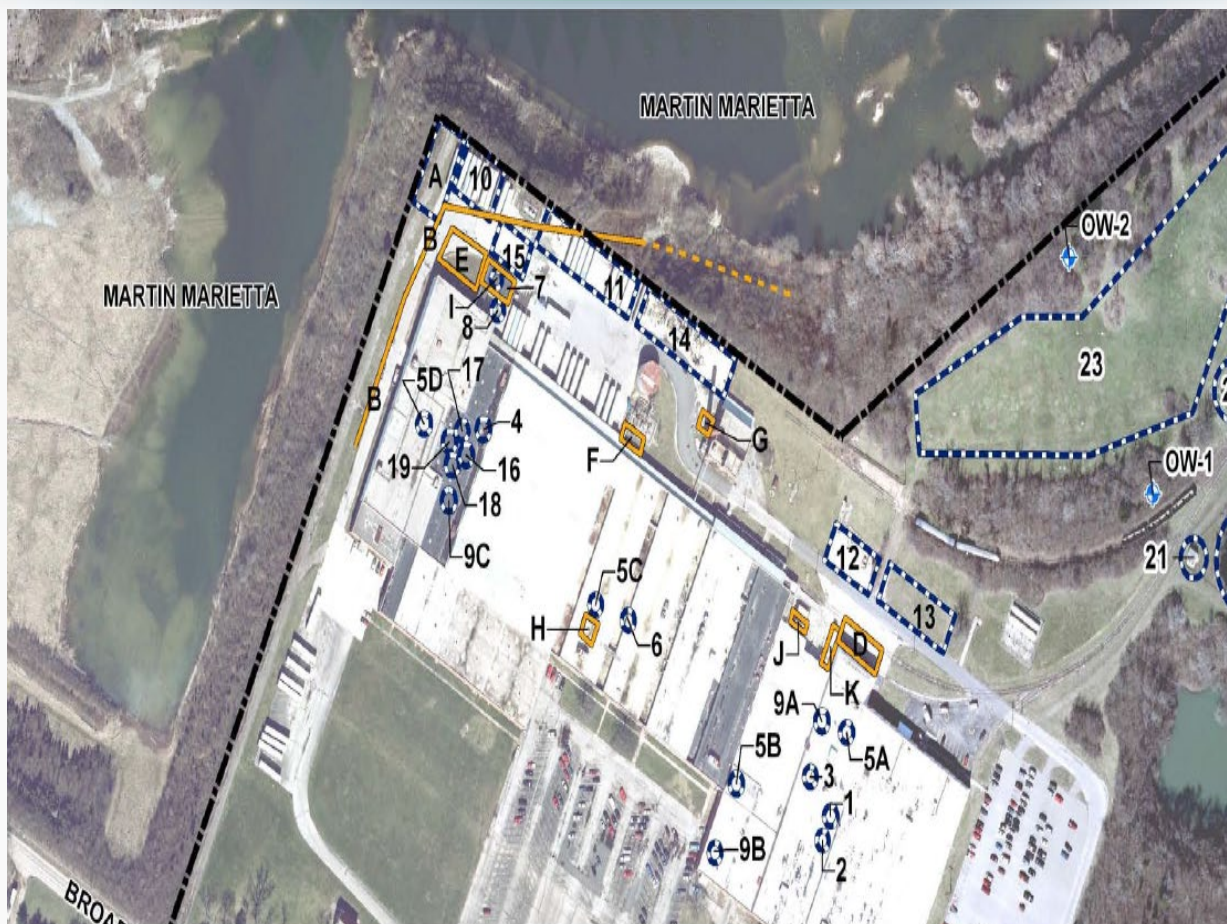
- Regulate companies that transport, store or dispose of hazardous waste under the Resource Conservation and Recovery Act's Corrective Action program
- Evaluate releases of hazardous wastes and hazardous constituents
- Develop and implement remedial measures to protect human health and the environment
- Negotiate legal orders between EPA and the company to establish what the company must do to determine if site is contaminated

Bway Corporation



- A 77 acre, three-piece can manufacturing facility, located at 8200 Broadwell Road, Cincinnati, Ohio.
- In 2007, EPA and Bway entered an Administrative Consent Order requiring that Bway investigate, and cleanup chemical wastes released at the site.

RCRA Facility Investigations



- On-site and off-site investigations to determine the nature and extent of contamination.
- Investigation conducted on soil, groundwater, surface water, and sediment.
- Low levels of metals and semi volatile organic compounds remain in soil under paved manufacturing areas.

Figure: Bway Investigation Areas

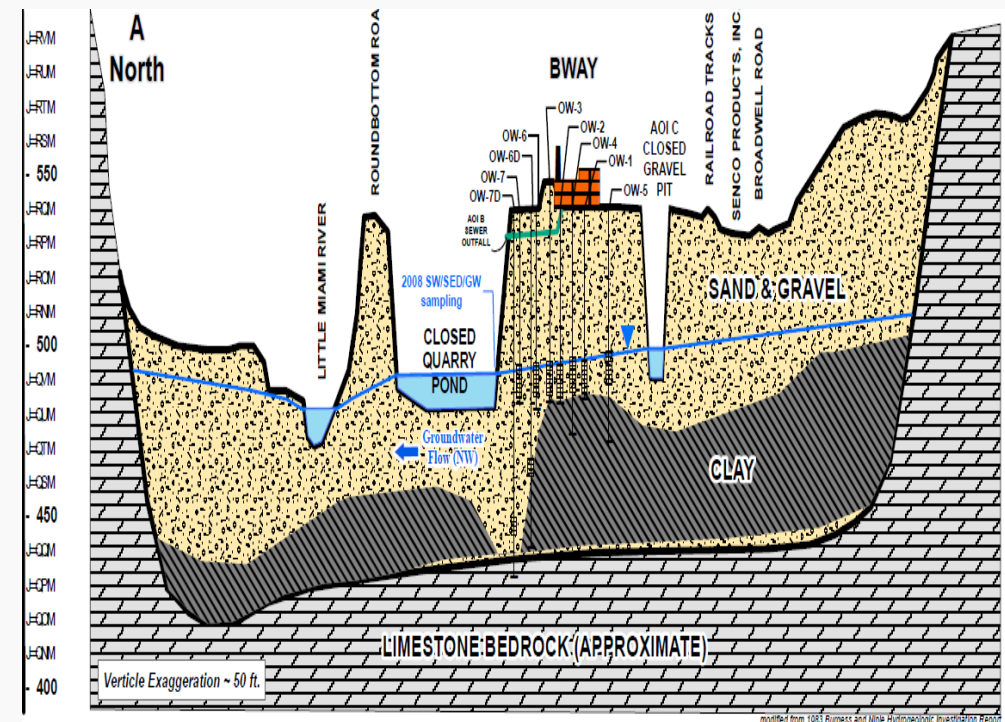
Remediation Objectives



Short-term Objectives

- Protect Human Health
- Control contaminated groundwater migration

Both objectives were achieved for the Bway site in 2016.



Remediation Objectives



Long-term Remedy Objectives

- Protect human Health (Industrial Workers, Maintenance Workers, Construction workers and trespassers)
- Protect Ecological receptors (Benthic invertebrates, fish community and other aquatic and terrestrial feeding wildlife populations)
- Protect Groundwater to meet drinking water standards
- Control the release from the source areas such that other media are not impacted

Risk Assessment



- The chemicals detected in the environmental media were screened against preliminary remediation levels protecting workers/trespassers.
- The chemicals detected in soil, sediment and surface water were screened against terrestrial and aquatic ecological population protective preliminary remediation levels.
- When the chemical levels exceeded the criteria, risk assessment was conducted after refining the site-specific exposures.
- **Results:** The screening and refined risk assessment for workers and ecological receptors did not show significant risk for all the chemicals that remain within the environmental media.

Proposed Remedy



Institutional Controls



Figure: Land Application Treatment Area

Land Use Restriction

- Deed restriction to commercial/industrial land use is filed through an Environmental Covenant

Groundwater Use Restriction

- Deed restriction prohibiting groundwater use is filed through an Environmental Covenant

Maintenance of the Paved Areas

- Visual inspection of the Site is conducted annually to confirm so that that the paved areas are maintained. The maintenance of the paved areas will significantly minimize the chemicals traveling through the soil column and contaminating groundwater

U.S. Environmental Protection Agency

Public Comments



The public may request a public hearing about this proposal, during which the public may submit written comments, ask questions, make statements, and otherwise discuss with EPA staff any concerns about or support for the approval. If requested during the public comment period, EPA will also host a public meeting to receive feedback directly. Due to restrictions related to the COVID-19 pandemic, a public meeting may be conducted virtually.

Next Steps



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EPA will receive and document all comments sent between March 9, 2022, and April 8, 2022. EPA will select a final remedy after considering all the public comments received during the 30-day public comment period. There are several different ways to submit comments on the proposed Statement of Basis:

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