



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

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Commissioner

RCRA CORRECTIVE ACTION PROGRAM

STATEMENT OF BASIS

April 2024

Dekalb Metal Finishing
(f/k/a Bastian Plating, and Finish Corporation)
625 W 15th St
Auburn, IN 46706

EPA ID No. IND005224837

I. INTRODUCTION

Under the Resource Conservation and Recovery Act (RCRA), all permitted and interim status hazardous waste treatment, storage, or disposal facilities are required to conduct corrective action for any releases of hazardous waste or hazardous constituents at or from their facilities.

This Statement of Basis is issued by the Indiana Department of Environmental Management (IDEM), regarding Dekalb Metal Finishing (f/k/a Bastian Plating, and Finish Corporation), 625 West 15th Street, Auburn, Indiana 46706. IDEM has determined that no further corrective action is necessary for any of the identified solid waste management units (SWMUs) or areas of concern (AOCs) at this facility.

IDEM is issuing this Statement of Basis as part of its public participation responsibilities under RCRA Corrective Action Program guidance, and is using the administrative procedures found in 40 CFR Part 270, as adopted by reference, to provide public notice and solicit comments. The public notice period is hereby announced and will continue for 30 days from the published date of the Public Notice in [The Star \(DeKalb County\)](#) newspaper.

This Statement of Basis summarizes information found in greater detail in the work plans, reports, or other documents in this facility's administrative record, which can be accessed via IDEM's Virtual File Cabinet (VFC). IDEM encourages the public to review these documents in order to gain a more comprehensive understanding of the facility and the activities that have been conducted under RCRA authority. IDEM may modify this corrective action determination or select another remedy based on public comments or new information obtained.

This determination will complete the corrective action process under the RCRA Corrective Action Program for this facility. The facility must continue to comply with all applicable parts of RCRA.

II. FACILITY BACKGROUND

The facility operated as Bastian Plating until 1993, when it changed its name to Finish Corporation. The facility changed its name to Dekalb Metal Finishing in 1998. Facility operations involved cadmium, chromium, tin, and zinc cyanide electroplating until 1995, when operational changes were made to the current non-cyanide zinc and zinc alloy electroplating process. Runoff, spills, and rinses were discharged from a floor drain directly to the city sewer up until 1985 when a wastewater pretreatment system was installed.

Historically, this facility has operated as a large quantity generator of hazardous waste and has been associated with the following waste codes: D001, D002, D003, F006, F007, F008, F009, K002, K004, K005, K006, K066, K067, K068, P106, P121.

Per discussion with Mr. Paul Fry of DeKalb Metal Finishing, the historical use of solvents has been minimal. He further indicated that the facility has not used chlorinated solvents.

A 2019 RCRA compliance inspection report (VFC# 82849813) listed the following waste streams:

- D002 – waste plating solution
- D007 – waste plating residue
- D002, D007- Alkaline Baths
- D002 – Contaminants from nickel solution
- F006 – wastewater treatment sludge from electroplating operations

Hazardous waste violations (including illegal storage of containers) were identified at the facility in 1988, resulting in a 1989 IDEM Commissioners Order (VFC # 65128169), a 1994 IDEM Partial Agreed Order (VFC# 66273497), and an 1998 IDEM Agreed Order (VFC# 66273847).

Per the 1998 Agreed Order and in accordance with a January 1999 approved plan (VFC# 70360741), the facility conducted closure of 4 illegal hazardous waste container storage areas. Hazardous waste stored included wastewater treatment sludge (F006), waste chromic acid (D002, D007), waste liquid nickel and sodium hydroxide, and liquid chrome and cyanide (D003, D007). Hazardous Waste Container Storage Areas 1, 2 and 4 were located adjacent to each other, outdoors just east of the building. Hazardous Waste Container Storage Area 3 was located indoors in the southwest portion of the building.

The facility submitted a June 2003 Sampling Report, which included proposed revised closure levels (VFC# 26558207), and a Revised Cleanup Plan (VFC# 26557436) for the closure areas. These documents were approved by IDEM in August 2003 (VFC# 70258669). The facility's December 2003 closure report and certification (VFC# 26557316) for total closure was approved by IDEM in January 2004 (VFC# 26563762).

III. SITE ASSESSMENT

IDEM conducted a site visit on November 2, 2022 to evaluate the facility for SWMUs and AOCs that required additional scrutiny. During this visit, the following SWMUs and AOCs were evaluated:

SWMU 1	Former Hazardous Waste Container Storage Area 1
SWMU 2	Former Hazardous Waste Container Storage Area 2
SWMU 3	Former Hazardous Waste Container Storage Area 3
SWMU 4	Former Hazardous Waste Container Storage Area 4
SWMU 5	Less than 90 Day Hazardous Waste Container Storage Unit
SWMU 6	Wastewater Treatment Plant

None of the SWMUs or AOCs showed evidence of an existing release. Further information is available in the RCRA Facility Assessment Report (VFC # 83469712), and the subsequent groundwater investigation report (VFC# 83575873).

IV. SUMMARY OF THE CORRECTIVE ACTION DETERMINATION

Based on the administrative record, IDEM is proposing no further action for all of the identified SWMUs and AOCs. IDEM recommends that a Corrective Action Complete without Controls determination be issued for the Dekalb Metal Finishing facility. "Without Controls" means land use restrictions (institutional controls) will not be required and there is no known contamination remaining on-site that requires the use of any engineered control to prevent unacceptable risks to human health or ecological receptors.

V. PUBLIC PARTICIPATION

The public is encouraged to review and submit written comments on this proposed determination, particularly if you are aware of past spills and/or releases that have occurred at this facility. You may request IDEM hold a public hearing. At a public hearing, you would have the opportunity to submit oral or written comments. If a public hearing is held, IDEM will make a separate announcement of the date, time, and location of that hearing/meeting 30 days in advance.

The Public Notice and the administrative record are available for review on IDEM's Virtual File Cabinet. To view these documents, go to <http://vfc.idem.in.gov/>. Select "Document ID" from the Alternate Field drop-down menu and then enter the document number in the ID # cell. VFC document numbers are provided in Section VI. for the primary documents IDEM used to support this decision.

Before taking final action, IDEM will give full consideration to all significant and relevant comments received. IDEM will summarize the comments and its responses to the comments, and announce its decision in a Final Decision/Response to Comments document. This document will be incorporated into the administrative record. To send written comments or obtain further information, contact:

Jeff Workman
 Indiana Department of Environmental Management
 Office of Land Quality
 Hazardous Waste Permit Section
 IGCN Rm 1101
 100 North Senate Avenue
 Indianapolis, Indiana 46204-2251

Phone: (317) 232-3221
 E-mail: jworkman@idem.IN.gov

VI. REFERENCES

<i>Document Name</i>	<i>VFC #</i>
<i>IDEM Commissioner Order (Cause H-078) (1989)</i>	<u>65128169</u>
<i>Adoption of Partial Agreed Order (Cause 90-S-E-332) (1994)</i>	<u>66273497</u>
<i>Adoption of Agreed Order (H-12035)</i>	<u>66273847</u>
<i>Revised RCRA Closure Plan (1999)</i>	<u>70360741</u>
<i>RCRA Closure Plan Approval with Mod (1999)</i>	<u>26557889</u>
<i>Initial Soil Sampling Results Areas 1, 2, and 4 (2000)</i>	<u>26781329</u>
<i>Additional Sampling Report (2002)</i>	<u>26772158</u>
<i>Sampling Report and Proposed Revised Closure Levels (June 2003)</i>	<u>26558207</u>
<i>Cleanup Plan (June 2003)</i>	<u>26557436</u>
<i>Clean Up Plan Approval (Aug 2003)</i>	<u>70258669</u>
<i>Closure Certification Report (Dec 2003)</i>	<u>26557316</u>
<i>Certification of Closure Approval (Jan 2004)</i>	<u>26563762</u>
<i>RCRA Compliance Evaluation Inspection (2019)</i>	<u>82849813</u>
<i>RCRA Facility Assessment (RFA) (2022)</i>	<u>83469712</u>
<i>RCRA Facility Investigation Report – SWMU 2 (2023)</i>	<u>83575873</u>
<i>No Further Action Determination – SWMU 2 (2024)</i>	<u>83596326</u>