UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III

STATEMENT OF BASIS

GG CONNECTOR CORPORATION
LANGHORNE, PENNSYLVANIA
EPA ID # PAD 980555015

Prepared by
Office of Pennsylvania Remediation
Land and Chemicals Division
June 2014

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Section 1: Introduction

The United States Environmental Protection Agency (EPA) has prepared this Statement of Basis (SB) to solicit public comment on its proposed decision for the former GG Connector Corporation facility located at 9 Queen Anne Court, Langhorne, Pennsylvania, 19047 (Facility). 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's proposed decision is that no further investigation or cleanup is required. EPA has determined that its proposed decision is protective of human health and the environment and that no further corrective action or land use controls are necessary at this time. This SB highlights key information relied upon by EPA in making its proposed decision.

The Facility is 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 investigated and cleaned up any releases of hazardous waste and hazardous constituents that have occurred at their property. The Commonwealth of Pennsylvania (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. See Section 5, Public Participation, for information on how you may review the AR.

Section 2: Facility Background

The Facility is situated on approximately 2.5 acres of land located in Langhorne, Falls Township, Bucks County, Pennsylvania. Existing on-site structures include the 82,170 square foot former production building with attached office space, a small storage building, and a public water pumping station owned by Falls Township Water Authority. Land use in the surrounding area is mainly industrial and wooded fields. The Facility is bound on the east by the Rite-Aid Pharmacy distribution center and to the west by the Enterprise Rent-A-Car company. To the north, the Facility is bound by Cabot Boulevard East and Highway One, followed by a large wooded field. A drainage ditch is located immediately south of the Facility, followed by a rail line and other light industrial facilities.

The original owners of the Property were Blakely and Dania Wheeler, J.M. Hines, and Paul F. Hellmul. In 1974, ownership of the Facility was transferred to Rudolf Kopell. From 1977 to 1995, the Facility was owned by Akzona/Brand-Rex and Brintec Corporation, ownership of which was later transferred to BR Holding in November 1983. The Facility operated under several different names including Electronic Manufacturing and Precision Assembly, Garry Manufacturing Company, Garry Electronics Company, General Connector, and GG Connector Corporation during this time. In 1995, the Facility was purchased by Pennsbury School District. Pennsbury School District is the current owner/occupant of the Facility.

Prior to 1973, the Facility was reportedly used for trailer manufacturing. Manufacture of PC boards started in 1974 under the ownership of Rudolf Kopell. PC board manufacturing continued in the production building after the Facility was sold to Akzona (Brand-Rex/Brintec) in 1977. Active operations during this time included nickel-gold and copper-tin-lead electroplating using cyanide and acids, and the associated cleaning, etching, and stripping of the PC boards. The Facility operated a vapor degreaser which used trichloro-trifluoroethane (Freon 11) solvent containing methylene chloride. In 1989, the Facility began using 1,1,1-trichloroethane (TCA) as a degreasing solvent.

The Facility closed in 1994 and was purchased in 1995 by Pennsbury School District. Pennsbury School District currently uses the former production building for storage of audiovisual media and computers, warehousing space, and a copy shop. No RCRA-regulated activities are being conducted at the Facility at this time.

A Facility location map is attached as Figure 1.

Section 3: Summary of Environmental History

Four Solid Waste Management units (SWMUs) were identified at the Facility: TCA and Waste Oil Drum Storage Area; Former Cooling Water Drain; Inactive Drum Storage Area; and Degreaser Area. Additionally, the Facility operated two heating oil Underground Storage Tanks (USTs) which were removed on May 17, 1995. Lastly, three Areas of Concern (AOCs) were identified at the Facility: an inactive sump; distillation room/Freon recovery still; and wastewater pretreatment area.

In April 2014, Michael Baker Jr., Inc. (Baker), under contract to the Pennsylvania Department of Environmental Protection (PADEP) through grant funding from the U.S. Environmental Protection Agency (USEPA) performed intrusive investigation sampling activities at the Facility to assess the quality of the soil, soil gas, and groundwater to determine if any releases to the environment occurred from RCRA Corrective Action units (SWMUs, USTs or AOCs).

The investigation work plan proposed the collection of shallow groundwater samples. Shallow groundwater was not encountered during the investigation and no groundwater samples were collected. However, very few former Facility related hazardous waste compounds were identified in soil samples from the UST, AOC, and SWMU areas. All soil sample results presented in the Field Investigation Letter Report RCRA GG Connector Corporation Site submitted in May 2014 (Report) were below EPA's most stringent Regional Screening Levels for Residential use which indicates that there were no or only minor releases in the shallow subsurface and soil to groundwater impacts would not be able to occur. Therefore, USEPA has determined that soil and groundwater are not known or reasonably suspected to be contaminated.

Indoor sub-slab and outdoor soil gas samples were also taken as part of the April 2014 field investigation to determine if there was a potential for indoor air impacts. Report findings showed former Facility related hazardous waste compounds were identified in soil gas samples. EPA modeled the potential for the soil gas samples to migrate into buildings using EPA's Vapor Intrusion Screening Level (VISL) Calculator. Results showed that there is a calculated potential for the identified constituents in the soil gas to cause elevated indoor air concentrations under industrial and residential uses. However, these calculated elevated levels are within the EPA Corrective Action Program's acceptable risk range. Therefore, air media are not contaminated above appropriately protective risk-based levels from releases subject to Corrective Action.

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. The EPA has determined that the Facility met both the migration of contaminated groundwater under control and the current human exposures under control indicators on June 19, 2014.

Section 5: Public Participation

Before EPA makes a final decision on its proposal 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 AR contains all information considered by EPA in reaching this proposed decision. It is available for public review during normal business hours at:

U.S. EPA Region III
1650 Arch Street
Philadelphia, PA 19103
Contact: Kevin Bilash
Phone: (215) 814-2796
Fax: (215) 814-3113
Email: bilash.kevin@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 Mr. Kevin Bilash. EPA will hold a public meeting to discuss this proposed decision upon request. Requests for a public meeting should be made to Mr. Kevin Bilash.

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

Date: 6.25.14

John A. Armstead, Director
Land and Chemicals Division
US EPA, Region III

Figure 1 – Facility Location Map

Index to Administrative Record

Preliminary Assessment Report, prepared by NUS Corporation, August 22, 1989

Environmental Indicator Inspection Report for GG Connector Corporation, prepared by URS, June 2009

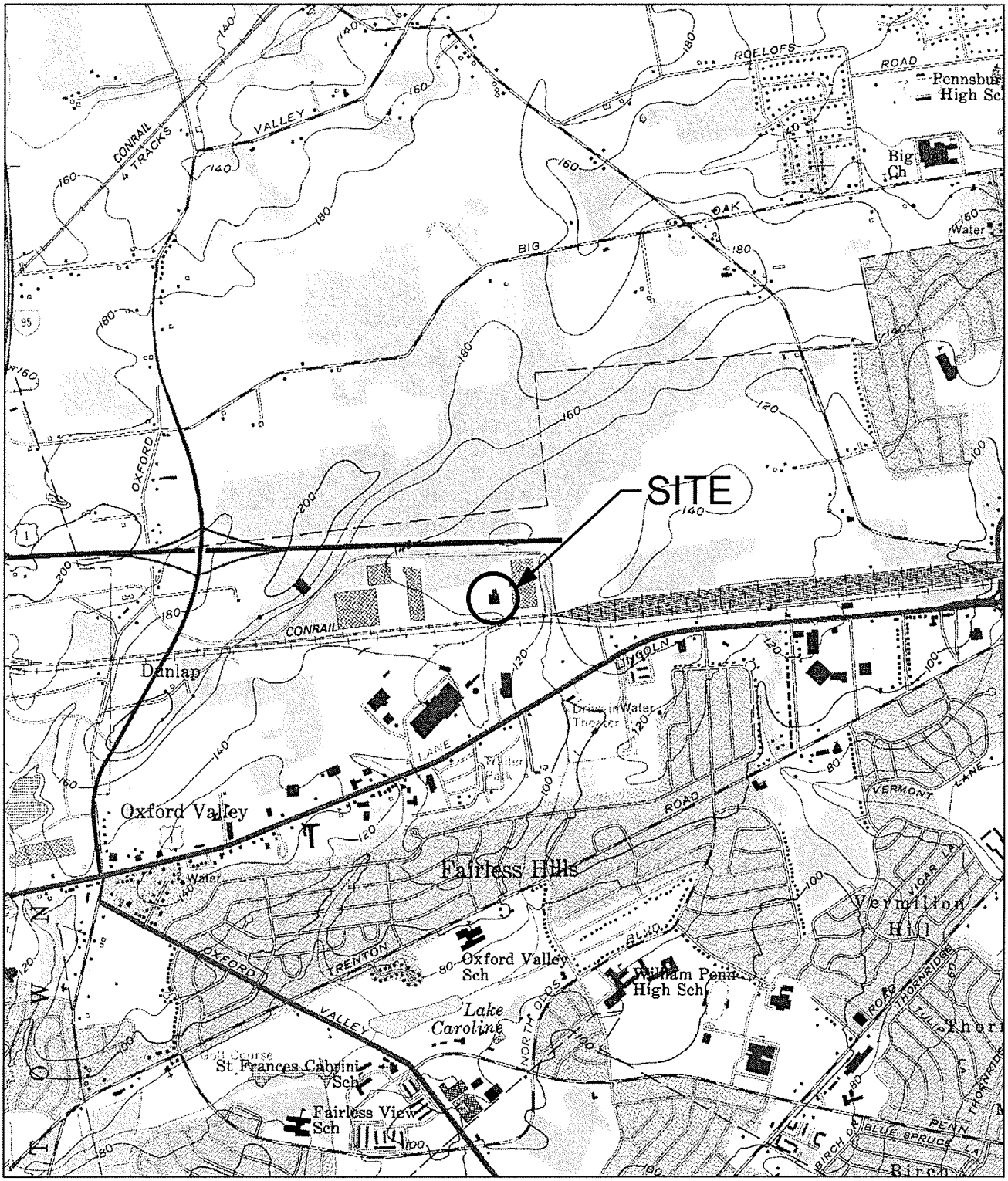
Field Investigation Letter Report RCRA GG Connector Corporation Site, prepared by Michael Baker Jr., Inc., May 2014

VISL_GG SG-1.xlsm – EPA May 2014

VISL_GG SG-2.xlsm – EPA May 2014

VISL_GG SG-3.xlsm – EPA May 2014

VISL_GG SG-5.xlsm – EPA May 2014



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SCALE IN FEET

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REFERENCE:
A Portion of USGS 7.5 Minute Topographic Map;
Trenton West Quadrangle , New Jersey & Pennsylvania;
1955, Photorevised 1981.

TITLE	SITE LOCATION MAP		
PROJECT	GG Connector Corporation		
URS	4507 NORTH FRONT STREET, SUITE 200 HARRISBURG, PENNSYLVANIA 17110 (717) 635-7901 FAX (717) 635-7902 www.urscorp.com		
SCALE AS SHOWN	DWN. BY AWJ	JOB NO. 20497882	
DATE 9/16/08	APPR. BY TME	FIG. NO. 1	

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