



UNITED STATES

ENVIRONMENTAL PROTECTION AGENCY

REGION III

STATEMENT OF BASIS

| FORMER LANSDALE FINISHERS |

| LANSDALE, PENNSYLVANIA |

EPA ID NO. PAD | 002371581 |

I. 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 Lansdale Finishers facility located at 21 Williams Place, Lansdale PA 19446 (Facility). EPA has determined that the 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. 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 VI, Public Participation, for information on how you may review the AR.

II. Proposed Decision

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 environmental cleanup is required at the Facility.

III. Facility Background

The Facility is located at 21 Williams Place in Lansdale, Montgomery County, Pennsylvania. The Facility is bordered by the Reading Railroad line to the east and north, and commercial buildings and residential housing to the south and west. The Facility covers approximately 3 acres.

Since approximately 1968, the Facility received pre-manufactured metal components, cleaned and treated them, applied a finish, and baked the components to harden the finish. The Facility submitted a Part A Hazardous Waste Permit application in November 1980 for the storage of 300 gallons of hazardous waste; however, a Part B permit application was never submitted, and the Facility submitted a revised notification in 1984 for the deletion of the storage activity and to be listed as a generator of hazardous waste only. The Facility ceased operations and has been vacant since June 2003.

IV. Summary of Environmental History

A Preliminary Assessment was conducted in 1989 at the Facility by NUS Corporation on behalf of EPA. Seven solid waste management units (SWMU) were identified. Waste paint fragments and powders were observed on the ground in the empty drum storage area and near the dumpster. No releases or spills had been documented from any of the SWMUs.

In 2003, RT Environmental submitted a Phase I Environmental Site Assessment on behalf of the Facility. The Phase I identified the Facility as within the boundaries of the North Penn Area 6 Superfund site, meaning the groundwater beneath the Facility has potentially been impacted by the Superfund site. As the Facility is listed as a No Further Remedial Action Planned site under Superfund, the Facility was investigated and determined not likely to have contributed to the impacted groundwater.

Recommendations from the Phase I report were completed in a subsequent Phase II report from RT Environmental, which included the removal of an underground storage tank and the characterization and remediation of the surrounding area, and a subsurface soil investigation to determine if historical operations had impacted soil or groundwater beneath the Facility in the vicinity of the former sump system. Results following these remedial efforts indicated that no further action was necessary to protect human health and the environment in these areas of the Facility.

An Environmental Indicator Inspection was conducted at the Facility in February 2004 by Tetra Tech on behalf of EPA. The report included a summary of the previous investigations mentioned above and identified eight SWMUs. Drums of process materials in the former Paint Storage Vault and stray drums and debris in the intermittent creek near the former Empty Drum Storage Area were identified as concerns following the inspection; these process materials have since been removed from the Facility, and the intermittent creek and surrounding areas have been cleared of debris.

EPA conducted a site visit in April 2010 as a follow-up to the Environmental Indicator Inspection to determine whether any further investigation or remediation was warranted at the Facility. As a result of this visit and taking into account information from the Preliminary Assessment and Environmental Indicator Inspection reports, it was determined that soil and soil gas samples should be taken to confirm the absence of metals impacts in the former Empty Drum Storage and Paint Vault areas and volatile organics impacts from the area of the former underground storage tank. This work was completed in May 2011 by Michael Baker Jr., Inc. on behalf of EPA. Although soil gas vapor points were not able to be installed at the site due to the high water table, field measurements and visual observations indicated no impacts throughout the area of the former underground storage tank and loading dock. All soil sampling results from the former Empty Drum Storage and Paint Vault areas were below the residential soil Regional Screening Levels for EPA Region 3. As a result, the Facility met both Environmental Indicators (human exposures to contamination and migration of contaminated groundwater) in July 2011.

V. 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 Facility met these indicators on July 26, 2011.

VI. Public Participation

Before EPA makes a final decision on its proposal for the Facility, the public may participate in the remedy 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: Mr. Griff Miller (3LC30)
Phone: (215) 814-3407
Fax: (215) 814-3113
Email: miller.griff@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. Griff Miller. EPA will hold a public meeting to discuss this proposed decision upon request. Requests for a public meeting should be made to Mr. Miller.

EPA will respond to all relevant comments received during the comment period. If EPA determines that new information warrant 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. Miller at the address listed above.

Date: 8/17/11

/Abraham Ferdas/

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