



UNITED STATES

ENVIRONMENTAL PROTECTION AGENCY

REGION III

STATEMENT OF BASIS

Akrion Systems LLC

Allentown, PENNSYLVANIA

EPA ID NO. PA0000928812

## **I. Introduction**

The United States Environmental Protection Agency (EPA) has prepared this Statement of Basis (SB) for the Akrion System LLC facility located at 6330 Hedgewood Drive (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, our 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 V, Public Participation, for information on how you may review the AR.

## **II. Facility Background**

The Facility is located at 6630 Hedgewood Drive in Allentown, Salisbury Township, Lehigh County, Pennsylvania as shown in Figure 1. The Facility is bordered by an industrial/office complex of buildings, toward the north/northeast, there is a residential park and residential subdivision. The Facility covers less than one (1) acre.

The Facility was formerly owned by SubMicron System Inc. SubMicron System Inc. submitted a Notification of Regulated Waste Activity to the US Environmental Protection Agency on October 18, 1994. In September 1999 SubMicron filed for Chapter 11 bankruptcy and on October 15, 1999 SubMicron System received approval from the US Bankruptcy Court for the sale of all assets to Akrion LLC. Akrion Systems is a leading supplier of advanced surface preparation systems used in the manufacture of solar, semiconductor and related devices.

## **III. Summary of Environmental History**

There are no Areas of Concern (AOCs) at the facility. No releases have been reported by the Facility and there is no evidence of release.

All operations take place indoors and all waste storage tanks are above ground. There are currently one (1) 1,500 gallon waste storage tank and one (1) 500 gallon waste storage tank located at the Facility. Both storage tanks are located inside on concrete. These tanks store "dirty" solutions that have been through an Elementary Neutralization Unit (ENU). There are no underground storage tanks.

There are no floor drains in the Applications lab and in the Application Lab Mechanical Room. The Applications Lab Mechanical Room is where the hazardous chemicals are stored, dispensed to the Applications Lab, treated for pH and discharged to the sanitary sewer. Spills are cleaned up using absorbent or a vacuum.

Review of all records and discussions during a June 2, 2011 site visit indicate that there have been no reportable releases, no instances or evidence of soil or groundwater contamination, no site remediation and no past, current, or planned monitoring efforts necessary at this Facility. The record review and site visit are documented in the Final Environmental Indicator Inspection Report which is contained in the AR and available upon request.

#### **IV. 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 these indicators on November 2, 2011.

#### **V. 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:

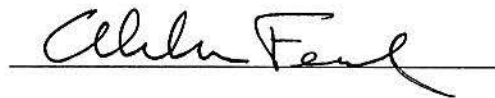
U.S. EPA Region III  
1650 Arch Street  
Philadelphia, PA 19103  
Contact: **Catheryn Blankenbiller**  
Phone: (215) 814-3464  
Fax: (215) 814-3113  
Email: Blankenbiller.Catheryn@epa.gov

Interested parties are encouraged to review the AR and comment on EPA's proposed

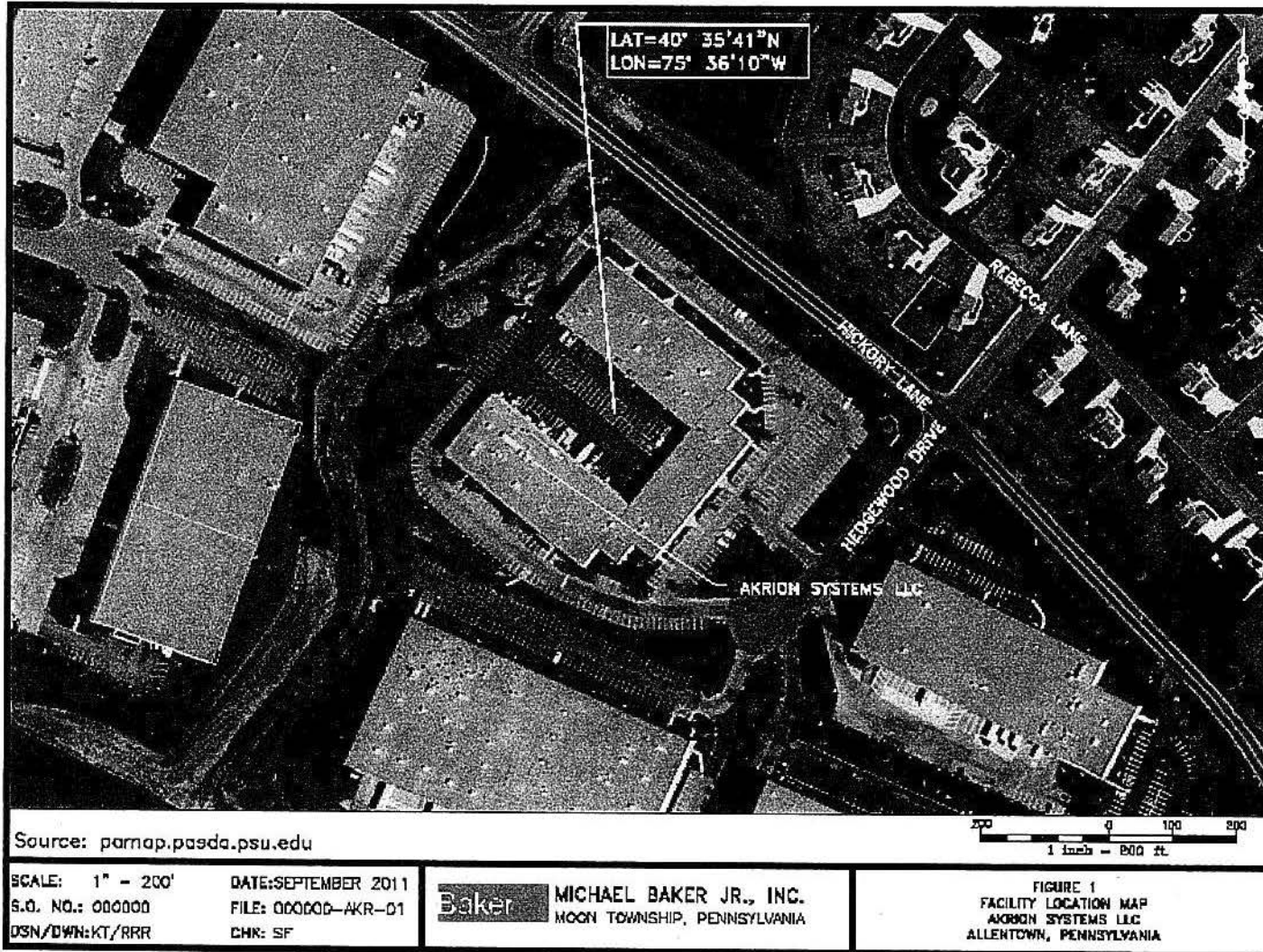
decision. The public comment period will last thirty (30) calendar days from the date that notice is published in a local newspaper. You may submit comments by mail, fax, or e-mail to **Catheryn Blankenbiller**. EPA will hold a public meeting to discuss this proposed decision upon request. Requests for a public meeting should be made to **Catheryn Blankenbiller**.

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 **Catheryn Blankenbiller** at the address listed above.

Date: 11/30/11



Abraham Ferdas, Director  
Land and Chemicals Division  
US EPA, Region III



EPA Figure 1: Facility Location Map

Akron Systems LLC  
Administrative Record File  
Index of Documents

RCRA Permitting  
Part A Permit Application  
Notification

1. United States Environmental Protection Agency (U.S.EPA) Notification of Hazardous Waste Activity Form, October 18, 1994.

Corrective Action  
Facility Investigation  
Background Reports and Studies

1. U.S. EPA Environmental Indicator Inspection Report, September 2011.
2. U.S. EPA Environmental Indicator, Current Human Exposures Under Control, October 13, 2011
3. U.S. EPA Environmental Indicator, Migration of Contaminated Groundwater Under Control, October 13, 2011

Inspections

1. Department of Environmental Resources Bureau of Waste Management, March 25, 1997.
2. Department of Environmental Protection Bureau of Land Recycling and Waste Management, September 30, 2005.