



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III

STATEMENT OF BASIS

BRENNTAG NORTHEAST, INC.
OAKMONT, PENNSYLVANIA
EPA ID # PAD 004318960

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

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 Brenntag Northeast, Inc. facility located at 1085 Allegheny Avenue, Oakmont, Pennsylvania, 15139 (Facility). The decision proposed in this SB includes only the 6.44-acre parcel owned by Brenntag Northeast, Inc. and discusses, but does not include, a 1.53-acre parcel that was historically part of the contiguous property and now owned by the Borough of Oakmont. 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 6.44-acre Brenntag Northeast, Inc. Facility is located at 1085 Allegheny Avenue in Oakmont, Allegheny County, Pennsylvania. Brenntag Northeast, Inc. is part of the Brenntag-Group, the global market leader in full-line chemical distribution. The Oakmont branch office is a full line distribution company, servicing western Pennsylvania, northeast Ohio, and northern West.

The facility was originally built in the late 1800s. It is believed that the Facility was originally a foundry. Prior to 1926, the Facility was operated by Gifford-Wood Company, whose operations are unknown. On December 8, 1926, the Gifford-Wood Company transferred the Facility to Thompson & Company, which operated as a paint manufacturing plant. In 1944, several smaller areas of land located to the southwest of the manufacturing area, which contained five small buildings including a lacquer building and four apparent residences, were deeded to Thompson & Company. Thompson & Company changed names to Technical Coatings Company (TCC) on August 30, 1966 and was subsequently purchased by Benjamin Moore & Co. According to Benjamin Moore & Co., TCC ceased operations in at the facility in 1977 or 1978; other documentation indicates the facility was used to manufacture paint products until late October 1981, when TCC closed.

TCC filed a Notification of Hazardous Waste Activity form with the EPA on July 18, 1980 and was issued EPA Generator No. PAD004318960 on October 9, 1980. A Part A hazardous waste permit application for treatment, storage, or disposal (TSD) and generation was submitted to the EPA on November 10, 1980.

In 1981, Stinnes Oil and Chemical (SOCO), a German parent company, purchased Textile Chemical which moved its Pittsburgh warehouse to this facility in Oakmont, Pennsylvania. The property was transferred from TCC to Textile Chemical (6.44 acres per Allegheny County tax records; Parcel 362-G-364]) on March 31, 1982. TCC retained the 1.53-acre parcel (362-G-360) located in the southwest section of the original parcel. In 1998, the parent company, SOCO, changed its name to Brenntag. In May 2001, Textile Chemical officially changed its name to Brenntag Northeast, Inc. On December 9, 2008, the 1.53-acre parcel was sold to the Borough of Oakmont.

A Facility location map is attached as Figure 1.

Section 3: Summary of Environmental History

On September 25, 1989, NUS submitted the Final Preliminary Assessment (PA) for TCC to the EPA. It recommended that no further action under the Comprehensive Environmental Response, Compensation, and Liability Act be conducted at the Facility. Three SWMUs were identified at the Facility as described in the PA: 1) waste solvent storage area, 2) resin drum storage area, and 3) AST tank area (bulk solvent storage area).

On March 8, 2006, TCC submitted to the Pennsylvania Department of Environmental Protection (PADEP) a Notice of Intent to Remediate soil contaminated with lead above the Land Recycling Program's (Act 2) Statewide Health Standard direct contact residential and soil to groundwater used aquifer residential and nonresidential medium-specific concentrations (MSCs) and naphthalene above the soil to groundwater used aquifer residential and nonresidential MSCs on the 1.53-acre parcel. Remnant 55-gallon drums and paint cans were found discarded in a wooded ravine. A Final Report dated August 31, 2006 presented the results of a site investigation, remedial action, and groundwater monitoring activities performed. On November 9, 2006, PADEP approved the Final Report for the substances identified in the area remediated to the non-residential MSCs (for lead [soil] and other organics [groundwater]). On February 9, 2009, an environmental covenant was recorded limiting the 1.53-acre parcel use to nonresidential.

EPA and Michael J. Baker Inc. (Baker) visited the Facility on November 14, 2013 as part of the Environmental Indicator (EI) process. Based upon this Facility visit and information in the EI Inspection Report, EPA determined that since the Act 2 program approved remedial efforts on the 1.53-acre Borough property to non-residential MSCs, further investigation activities at both parcels were required to assess the quality of the soil at the SWMU locations and determine current groundwater conditions. Therefore, in June 2014, Baker, under contract to PADEP through grant funding from the EPA performed soil and groundwater sampling activities.

On July 30, 2014, Baker submitted a Site Investigation Letter Report. All groundwater sample results were below EPA's Residential Regional Screening Levels (RSLs). Soil samples revealed low level Volatile Organic Compounds (VOCs) and Polynuclear Aromatic Hydrocarbons (PAHs) at most locations. However, only PAHs in one soil sample from SWMU 1 exceeded EPA's most stringent Residential RSLs. The EPA utilized ProUCL Version 5.0.00 to calculate a 95% Upper Confidence Level (UCL) to determine if exposure to the mean Facility PAH soil levels are above EPA Residential RSLs and will result in unacceptable impacts. The resulting UCL calculation indicated that the average Facility PAH levels are below EPA's Residential RSLs. Therefore, EPA has determined that soil and groundwater are not contaminated above appropriately protective risk-based levels from Facility releases subject to RCRA Corrective Action and no further investigation or cleanup is required.

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 August 25, 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.

Section 6: Signature

Date: _____

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, September 25, 1989

Act 2 Final Report, Former Technical Coatings Company, prepared by ENVIRON International Corporation, August 2006

Environmental Covenant, Borough of Oakmont, approved by PADEP January 13, 2009, recorded February 9, 2009

Environmental Indicator Inspection Report for Brenntag Northeast, Inc., prepared by Michael Baker Jr., Inc., March 2014

Site Investigation Letter Report RCRA/Brenntag Northeast, Inc., prepared by Michael Baker Jr., Inc., July 2014

ProUCL Version 5.0.00 User Guide, U.S. Environmental Protection Agency, EPA/600/R-07/041, September 2013

ProUCL Version 5.0.00 Technical Guide, U.S. Environmental Protection Agency, EPA/600/R-07/041, September 2013

95UCL Brenntag Ind and Res.xlsx – U.S.EPA August 2014

Statement of Basis
