



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III

STATEMENT OF BASIS

CAPITAL LUBRICANTS COMPANY
LEWISBERRY, PENNSYLVANIA
EPA ID # PAD980537609

Prepared by
Office of Pennsylvania Remediation
Land and Chemicals Division
August 2015

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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 Capital Lubricants Company facility located at 569 Industrial Drive in Lewisberry, York County, Pennsylvania 17339 (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 property consists of approximately 3.6 acres and is primarily surrounded by industrial development and small wooded areas. A location map and Facility diagram are attached as Figures 1 and 2, respectively.

Land use of the Facility property prior to 1979 is unknown; however, based on aerial photographs, it appears the property was formerly used as farmland at least until July 1971, when it was sold to New View Corporation. In October 1979, Capital Lubricants Company, Inc. purchased the property from New View Corporation and constructed the office/warehouse building. The equipment shed was constructed in 1981.

Dryden Oil Company acquired Capital Lubricants Company, Inc. in 1989, and in 1991 Castrol Heavy Duty Lubricants, Inc. purchased Dryden Oil Company. In 2000, BP Lubricants USA, Inc. acquired Castrol Heavy Duty Lubricants. In 2010, the current owner, Evergreen Property Trust LLC, purchased the Facility from BP Lubricants USA, Inc. CRS Reprocessing LLC has operated the Facility since 2005.

From 1979 to approximately 1986, the Facility was used in the distribution and servicing of a parts washing apparatus known as the Dirt Magnet, which was used to clean engine parts. Spent solvent from these machines was removed and replaced with new solvent at the Facility. The spent solvent was stored at the Facility in two aboveground storage tanks (ASTs) until pumped out and transported to a hazardous waste treatment facility for reprocessing or disposal. From 1986 to 2005, the Facility continued to be used as a general office and warehouse for the storage and distribution of Castrol oil products. Since 2005, CRS Reprocessing has used the Facility to reprocess, transfer, and/or beneficially reuse spent polyethylene glycol slurry from the silicon wafer industry, spent aluminum cold rolling fluids, and small quantities of oil and gas liquid waste under a residual waste general permit. Since 2005, hazardous wastes are no longer generated at the Facility.

Section 3: Summary of Environmental History

Based upon information in the 2014 Environmental Indicator (EI) Inspection Report, EPA identified nine areas of concern (AOCs) at the Facility. The table below describes the AOCs as well as the post-investigation status. Complete details, including sampling data, can be found in the individual reports which are listed in the Index section of this SB and located in the AR. Sampling included soil and groundwater and covered the AOCs identified by EPA at the Facility. Target screening levels were determined to be EPA Region 3's Residential Regional Screening Levels (RSLs) for Volatile Organic Compounds (VOCs) and metals in soil, and EPA's Maximum Contaminant Level (MCL) national primary drinking water standards for VOCs in groundwater.

Areas of Concern	Description	Current status
Burn Area	Wooden pallets, used electrical wiring with rubber coating, and possibly 1,1,1-trichloroethane previously burned in open pit in northwestern corner of Facility. PADEP collected soil sample in 1981; results showed only minor concentrations of VOCs. 1993 investigation sampled for benzene, toluene, ethylbenzene, xylenes (BTEX), metals, and total petroleum hydrocarbons (TPH). Results showed only TPH contamination; as a result, approximately 30 tons of impacted soil removed, tested non-hazardous, and disposed off-site as non-hazardous waste in November 1994.	BTEX and metals except arsenic (arsenic concentration consistent with natural background and is within RSL risk range) are below EPA's residential soil RSLs. Area presently is an open field grassed with healthy vegetation.
Bulk Loading Area	Concrete pad along west side of building where tanker trucks filled indoor motor oil ASTs and water UST via six steel and two PVC underground pipes. 1993 investigation sampled for BTEX, metals, and TPH. Results showed only TPH contamination; as a result, approximately 240 tons of petroleum-impacted soil removed, tested non-hazardous, and disposed off-site as non-hazardous waste in November 1994. Underground piping also removed. Some impacted soils remained beneath building and on western side of excavation where further soil removal was not possible; however, these residual petroleum impacts were expected to be non-hazardous and easily addressed through natural attenuation and degradation processes.	BTEX and metals except arsenic (arsenic concentration consistent with natural background and is within RSL risk range) are below EPA's residential soil RSLs. TPH detected at 337 mg/kg in one of six confirmation samples in 1994. Area presently consists of a covered and bermed concrete pad in relatively good condition with no significant cracks observed.

<p>Area behind Truck Parking and Storage Area</p>	<p>Gravel area northwest of Bulk Loading Area. 1993 investigation sampled for BTEX, metals, and TPH. Results showed only TPH contamination; as a result, approximately 2 tons of soil removed, tested non-hazardous, and disposed off-site as non-hazardous waste in November 1994.</p>	<p>BTEX and metals except arsenic (arsenic concentration consistent with natural background and is within RSL risk range) are below EPA’s residential soil RSLs. Area continues to be used to store unused equipment.</p>
<p>Aboveground Storage Tank (AST) Farm</p>	<p>Eight tanks initially installed in 1982 directly north of main building on unpaved gravel surface in grassed area surrounded by natural soil berm. 1993 investigation sampled for BTEX, metals, and TPH. BTEX and TPH were not detected. Original tanks were moved slightly east and reinstalled with four new tanks into new AST Farm with upgraded concrete pad and secondary containment in 2001.</p>	<p>BTEX and metals except arsenic (arsenic concentration consistent with natural background and is within RSL risk range) are below EPA’s residential soil RSLs. Former AST farm location is now open grassed area with healthy vegetation; new AST Farm in good condition with no evidence of spills or releases observed or reported. Only one tank in AST Farm currently in use.</p>
<p>Piping Area</p>	<p>Buried piping from AST Farm to warehouse building. 1993 investigation sampled for BTEX, metals, and TPH. BTEX and TPH were not detected.</p>	<p>BTEX and metals except arsenic (arsenic concentration consistent with natural background and is within RSL risk range) are below EPA’s residential soil RSLs. No sign of stressed vegetation during 2013 and 2014 visits; no evidence of spills or releases observed or reported.</p>
<p>Septic Tank Leach Field</p>	<p>Approximately 900-square-foot area along east side of warehouse building. 1993 investigation sampled for BTEX, metals, and TPH. BTEX and TPH were not detected.</p>	<p>BTEX and metals except arsenic (arsenic concentration consistent with natural background and is within RSL risk range) are below EPA’s residential soil RSLs. Vegetation in area appeared healthy during 2013 and 2014 visits.</p>
<p>Stormwater Management Pond</p>	<p>Located in southeast corner of Facility to manage stormwater from building roof and AST Farm containment; discharges to NPDES Outfall 001. 1993 investigation sampled for BTEX, metals, and TPH. BTEX and TPH were not detected.</p>	<p>BTEX and metals except arsenic (arsenic is within RSL risk range) are below EPA’s residential soil RSLs. Standing water typically not present in this area; area was grassed with healthy</p>

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		vegetation during 2013 and 2014 visits.
Former Underground Storage Tanks (USTs)	Two 10,000-gallon regulated USTs that stored antifreeze and diesel fuel installed near southwest corner of warehouse building in 1980, and one 10,000-gallon unregulated UST that stored cooling water installed near southwest corner of property in 1983. All three USTs removed in 1993 and were in good condition with no evidence of release other than at fill ports. Three post-excavation soil samples taken approximately 2 feet below bottom of each regulated UST; BTEX, TPH, and ethylene glycol (antifreeze) not detected except for xylenes in one sample beneath diesel fuel UST at concentration well below residential RSLs. One groundwater sample collected beneath each regulated UST at approximately 12 feet below ground surface; BTEX, TPH, and ethylene glycol not detected. No further action recommended; PADEP approved closure report in October 1993.	No further action required after 1993 closure. BTEX and ethylene glycol are below EPA's residential soil RSLs and below EPA's MCL drinking water standards.
Former Distillation Unit	Operated in southwest corner of warehouse building from 1984 to 1986, when solvent distillation process was moved to 570 Industrial Drive property. Area closed in January 1987 in accordance with PADEP-approved closure plan.	No further action required after 1987 closure. During 2013 and 2014 visits, area housed air compressor units. No evidence of spills or releases observed or reported.

In summary, concentrations of hazardous constituents identified in the soil are within EPA's Regional Screening Level risk range for residential use, and concentrations of hazardous constituents identified in groundwater are all below EPA's Maximum Contaminant Level national primary drinking water standards. Therefore, there are no risks to human health or the environment for any use at this Facility including residential.

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 determined that the Facility met these indicators on February 10, 2015.

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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: Griff Miller
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. 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 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. Miller at the address listed above.

Date: 8.18.15

/John A. Armstead/

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

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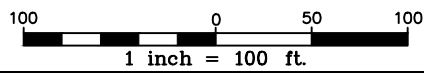
Index to Administrative Record

Phase II Environmental Site Investigation Final Report of Dryden Oil Company, prepared by Environmental Strategies Corporation, September 1993.

Underground Storage Tank Closure Report for Dryden Oil Company, prepared by Environmental Strategies Corporation, September 1993.

Remediation Assessment Report for Dryden Oil Company, prepared by Environmental Strategies Corporation, July 1995.

Environmental Indicator Inspection Report for Capital Lubricants Company, prepared by Baker, June 2014.



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LON=76°50'23.67"W

Source: Google, 2012

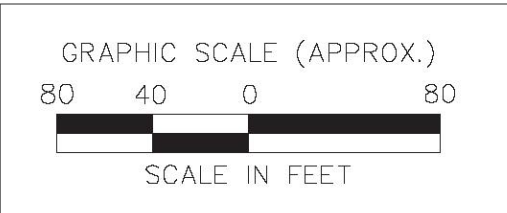
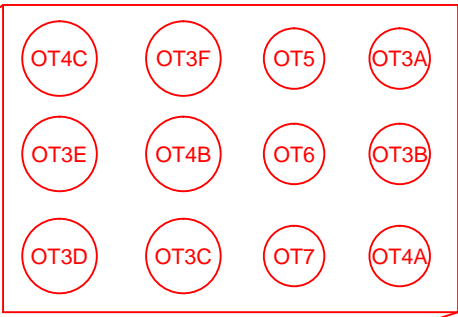
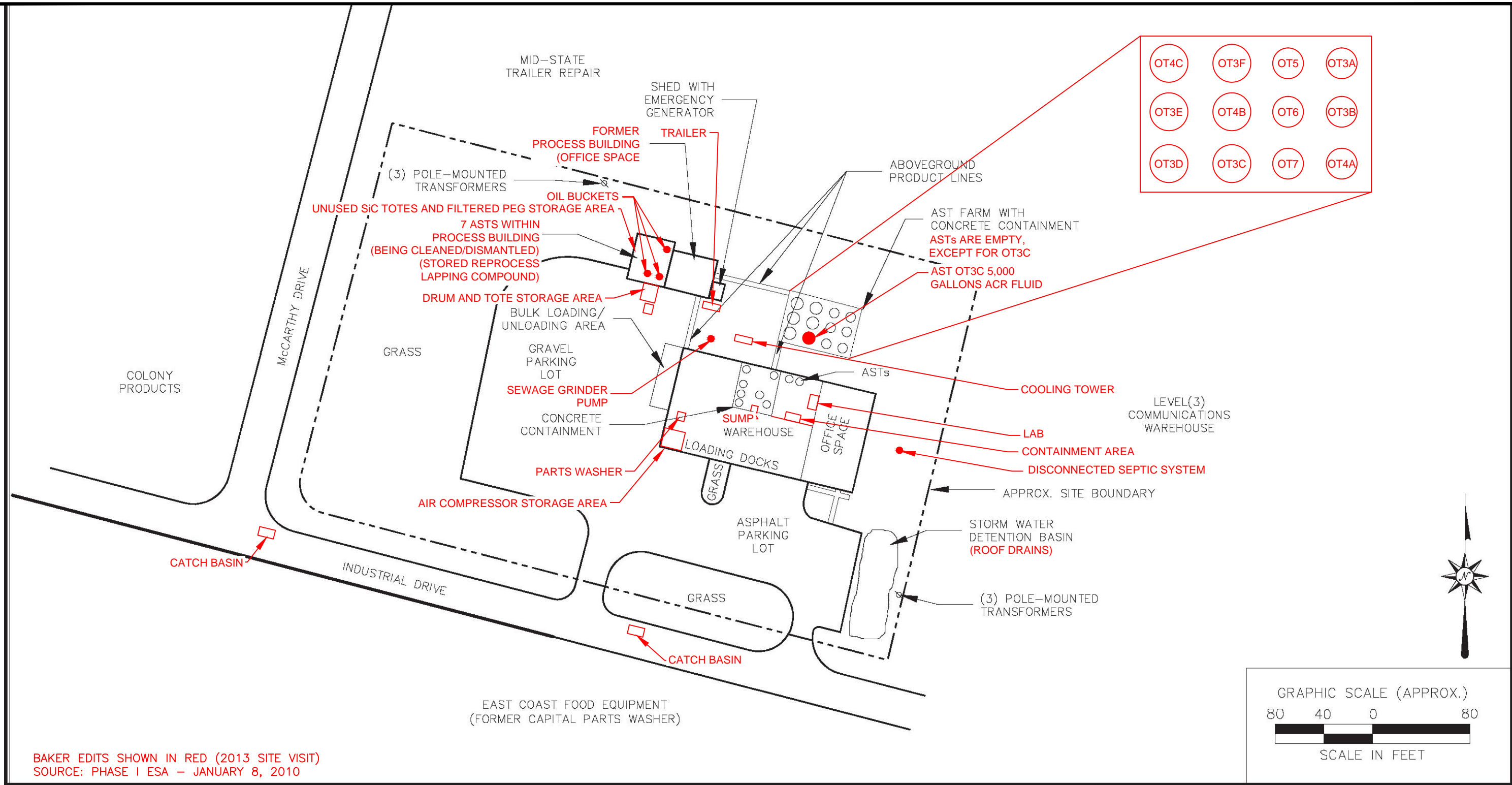
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S.O. NO.: 132734
DSN/DWN:SFR/RRR

DATE: MARCH 2014
FILE: 132734_FCL_901
CHK: SRF



MICHAEL BAKER JR., INC.
MOON TOWNSHIP, PENNSYLVANIA

FIGURE 1
FACILITY LOCATION MAP
FORMER CAPITAL LUBRICANTS COMPANY, INC
YORK, PENNSYLVANIA 17339



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SITE PLAN

569 INDUSTRIAL DRIVE
 FAIRVIEW TOWNSHIP, YORK COUNTY
 PENNSYLVANIA

Designed	G.J.H.
Drawn	G.J.H.
Checked	M.L.B.
Approved	K.Y.
Scale	~1"=80'
Project No.	09L1865
Date	12/23/09
CAD File	09L1865-SITE PLAN

SCALE: AS SHOWN
 S.O. NO.: 132734
 DSN/DWN: SFR/RRR

DATE: JULY 2014
 FILE: 132734_FCL_902
 CHK: SFR

Baker MICHAEL BAKER Jr., INC.
 MOON TOWNSHIP, PENNSYLVANIA

FIGURE 2
2013 FACILITY LAYOUT
FORMER CAPITAL LUBRICANTS COMPANY, INC
YORK, PENNSYLVANIA 17339