



UNITED STATES

ENVIRONMENTAL PROTECTION AGENCY

REGION III

STATEMENT OF BASIS

EDMUND OPTICS, INC.

PENNSBURG, PENNSYLVANIA

EPA ID NO. PAD 002334373

TABLE OF CONTENTS

SECTION	PAGE
I. Introduction.....	2
A. Facility Name.....	2
B. Proposed Decision.....	2
C. Importance of Public Input.....	2
II. Facility Background.....	2
III. Summary of the Environmental History	3
IV. Evaluation of EPA's Proposed Decision.....	4
V. Public Participation	4

I. Introduction

A. Facility Name

The United States Environmental Protection Agency (EPA) has prepared this Statement of Basis (SB) for the Edmund Optics facility located at 601 Montgomery Avenue, Pennsburg, PA 18073 (hereinafter referred to as the Facility).

The Facility is subject to the 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. Sections 6901 to 6992k. 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.

Information on the Corrective Action program as well as a fact sheet for the Facility can be found by navigating <http://www.epa.gov/reg3wcmd/correctiveaction.htm>.

B. Proposed Decision

This SB explains EPA's proposed decision that Corrective Action is complete and no land use controls are required for the Facility. EPA's proposed decision is based on a review of EPA and Pennsylvania Department of Environmental Protection (PADEP) files regarding the environmental history of the Facility as presented in the Final Environmental Indicator Inspection Report submitted in February 2002 and the results of the soil sampling conducted by EPA in 2004. Based on this review, EPA has concluded that there are no current or unaddressed releases of hazardous waste or hazardous constituents from the Facility.

C. Importance of Public Input

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 the complete set of reports that document Facility conditions, including a map of the Facility, in support of EPA's proposed decision. EPA encourages anyone interested to review the AR. The AR is available for public review at the EPA Region III office, the address of which is provided in Section V, below.

EPA will address all significant comments received during the public comment period. If EPA determines that new information or public comments 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 approve its final decision in a document entitled the Final Decision and Response to Comments (FDRTC).

II. Facility Background

The Facility is located at 601 Montgomery Avenue in Pennsburg, Upper Hanover Township, Montgomery County, Pennsylvania. Adjacent properties to the north and east of the

facility are residential, to the west are vacant and unimproved, and to the south consist of the Joint Water Authority facility and Green Lane Reservoir. The Facility covers 7.65 acres. Figure 1 found in Attachment A shows the location of the site.

Edmund Optics purchased the property from Plummer Precision Optics in October, 2000. Plummer owned and operated the facility from 1973 through the date of the sale. The site has been operated as a precision optical equipment manufacturer since 1973.

III. Summary of Environmental History

Plummer filed a Notification of Hazardous Waste Activity with the USEPA on August 18, 1980. On May 15, 1981, USEPA received a Part A permit application from Plummer for generation and treatment, storage, and disposal of hazardous waste. On December 9, 1983, Plummer submitted a revised Notification of Hazardous Waste Activity form to remove the facility's status as a TSD facility.

On March 22, 1991, Plummer received a National Pollutant Discharge Elimination System (NPDES) Permit PA0053864 for the discharge of process water by using two outfalls. Outfall 001 was used for Optical Coating Department – Non-Contact Cooling Water that emptied into a retention pond on the southern portion of the property and ultimately into an unnamed tributary of the Perkioman Creek. Outfall 002 was used to discharge Induction Heat – Non-Contact cooling water into the same unnamed tributary of the Perkioman creek. The permit was renewed on March 27, 1996 and expired on March 7, 2001. The facility no longer maintains a NPDES permit.

On July 25, 1995, PADEP granted Plummer a Permit-by-rule status for disposal of onsite treated process wastewater. The facility currently maintains Permit-by-Rule status for discharge of treated wastewater to the Upper Montgomery Joint Authority Public Treatment Works (POTW). The POTW requires daily pH monitoring and monthly effluent lead sampling with lead limitation of 0.1 mg/l for monthly average and 0.3 mg/l as an instantaneous maximum.

The facility operated 16 solid waste management units. These included a former 1,500 gallon liquid hazardous waste tank, an empty drum storage area, a former leaded sludge storage tank, an acetone recycling still, a 250-gallon aboveground storage tank, three 35-gallon used acetone vaulted storage tanks, a lens centering coolant oil filtering apparatus, a spray paint booth, a 350-gallon underground overflow vessel, a wastewater treatment and sludge storage room, a 2,000-gallon acetone tank, a 1,000 –gallon aboveground liquid hazardous waste tank, a drum storage room, and a former underground storage tank field.

There are no releases documented at the acetone recycling still and 250-gallon above ground storage tank, three 35-gallon used acetone vaulted storage tanks, the lens centering coolant oil filtering apparatus, the spray paint booth, the wastewater treatment and sludge storage room, the 2,000-gallon acetone tank, the 1,000-gallon aboveground liquid hazardous waste tank, and the drum storage room. The former underground storage tank field was closed in accordance with the Pennsylvania underground storage tank closure requirements.

In 2004, EPA collected soil samples around the underground overflow vessel, the former

1,500-gallon liquid hazardous waste underground storage tank, the former leaded sludge storage tank, and the empty drum storage areas. The samples were analyzed for volatile organic compounds (VOCs), semi-VOCs, and RCRA metals.

EPA reviewed the sampling results and reached the following conclusions:

1. Volatile Organic Compounds (VOCs)

All samples results for VOCs were below EPA screening levels for human health and groundwater impacts. EPA is proposing no further action.

1. Semi-Volatile Compounds (semi-VOCs)

Sample results for semi-VOCs were below EPA screening levels, with the exception of Benzo(a)pyrene. Benzo(a)pyrene was detected at levels up to 220 ug/kg (parts-per-billion). EPA soil screening level for non-residential use is 210 ug/kg. EPA is proposing no further action.

2. Metals

Metals were found at concentrations below the respective EPA Region 3 residential soil RBCs and migration to groundwater SSLs, except arsenic. Although arsenic was detected at concentrations above the respective EPA Region 3 residential soil RBCs of 0.4 mg/kg, arsenic was detected at concentrations as high as 15.4 mg/kg, below the respective EPA migration to groundwater SSL of 29 mg/kg. Additionally, the detected concentration fall within soil ranges for arsenic, which are typically anywhere from 1 to 40 mg/kg (The November 9, 2004 Edmund Industrial Optics Final Trip Report for July and August 2004 Soil Sampling Event prepared by Tetra Tech FW, Inc). EPA is proposing no further action for arsenic.

On February 6, 2006 and March 21 and 22, 2007, PADEP conducted inspections at the facility and found that Edmund deposited residual wastes in the form of paint pigment, resin-contaminated sand, and acid wash onto the surface of the ground. PADEP has investigated and determined the deposition of residual wastes did not result in releases of hazardous constituents to the environment.

On September 27, 2007, EPA determined that the facility had met both environmental indicators: (1) Current Human Exposures Under Control and (2) Migration of Contaminated Groundwater Under Control.

IV. Evaluation of EPA's Proposed Decision

EPA has determined that its proposed decision for the Facility is protective of human health and the environment and that no further corrective action or controls are necessary at this time.

V. Public Participation

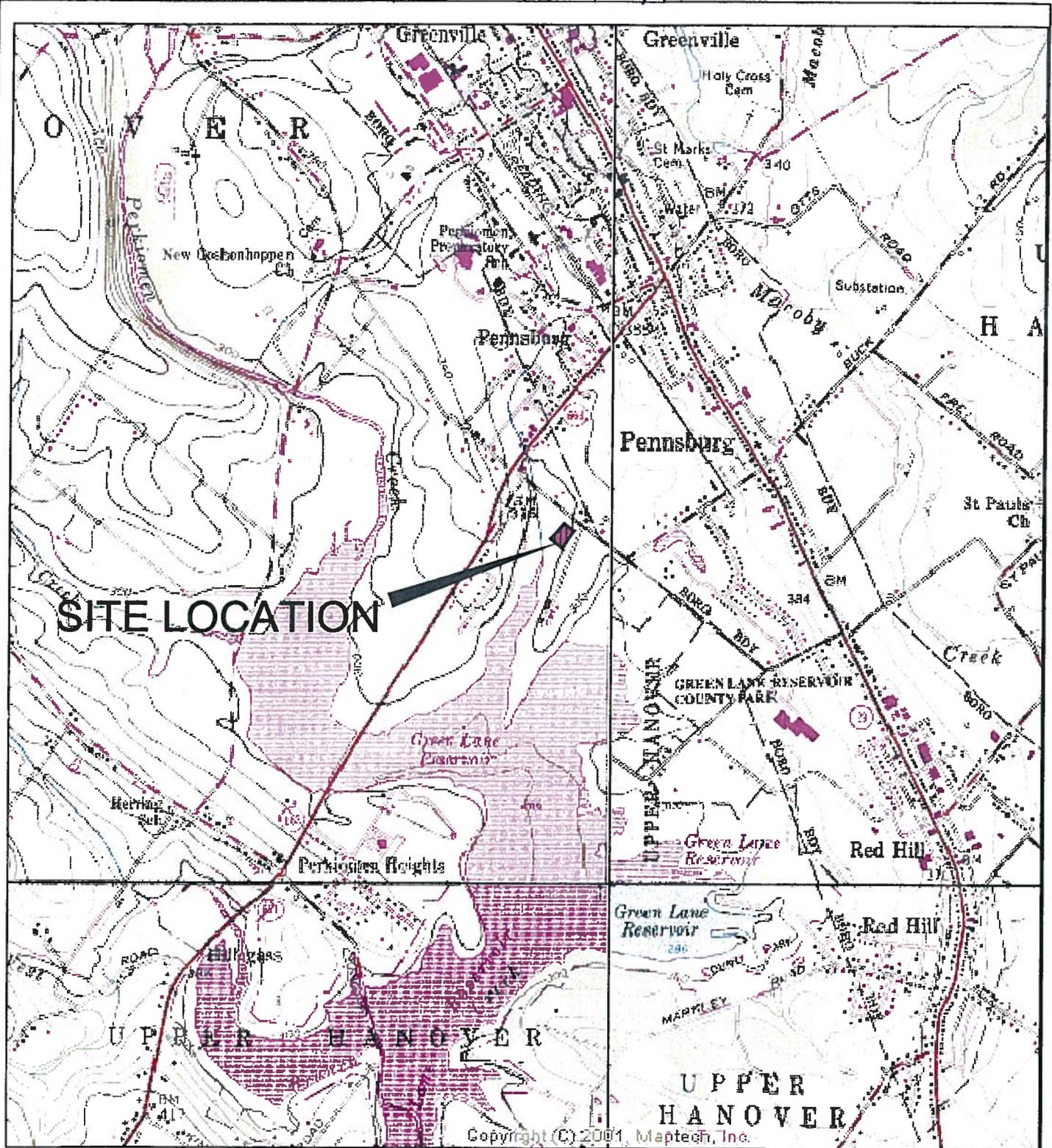
Interested persons are invited to comment on EPA's proposed decision. The public

comment period will last thirty (30) calendar days from the date that notice is published in a local newspaper. Comments may be submitted by mail, fax, e-mail, or phone to Ms. Tran Tran at the address listed below.

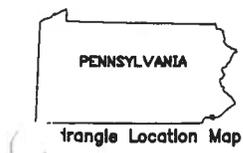
A public meeting will be held upon request. Requests for a public meeting should be made to Ms. Tran Tran at the address listed below. A meeting will not be scheduled unless one is requested.

The Administrative Record contains all the information considered by EPA for the proposed decision at this Facility. The Administrative Record is available at the following location:

U.S. EPA Region III
1650 Arch Street
Philadelphia, PA 19103
Contact: Ms. Tran Tran (3LC30)
Phone: (215) 814-2079
Fax: (215) 814 - 3113
Email: tran.tran@epa.gov



Copyright (C) 2001, Maptech, Inc.



Commonwealth of Pennsylvania
Department of Environmental Protection

Plummer Precision Optics

Figure 1

Site Location Map

 FOSTER WHEELER ENVIRONMENTAL CORPORATION

Source: U.S.G.S. Topographic Maps (7.5 Minute)
Harrisburg/Philadelphia

