



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III

STATEMENT OF BASIS

FORMER BETZ LABORATORIES, INC., (GE BETZ, INC.)

985 WHEELER WAY
LANGHORNE, PENNSYLVANIA

PAD 000 824 805

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

Table of Contents

Section 1: Introduction.....	1
Section 2: Facility Background.....	2
Section 3: Summary of Environmental History	3
Section 4: Environmental Indicators	4
Section 5: Public Participation.....	5
Index to Administrative Record.....	6
Figure 1: Map of Facility	7

Section 1: Introduction

The United States Environmental Protection Agency (EPA) has prepared this Statement of Basis (SB) to solicit public comment on its proposed remedy for the former Betz Laboratories, Inc. (Betz) facility located at 985 Wheeler Way, Langhorne, Pennsylvania (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.

Statement of Basis

Section 2: Facility Background

2.1 Introduction

The Facility property consists of approximately 8 acres and is surrounded by light industrial and commercial establishments in a business park. A location map is attached as Figure 1.

Since its start in 1979, the Facility has been owned by a number of entities, including; BetzDearborn, Hercules Hydrocarbon Holdings (Hercules), and General Electric. J&J Properties of Langhorne, LLC currently owns the Facility. Throughout its operation, the Facility produced a variety of specialty chemicals, including several hundred types of liquid polymers and blended products in batch operations from dry and liquid materials that were formulated to meet customer-specific applications. The Facility operated as a captive storage facility and had other permits for stormwater, air emission sources, and tank operations. Wastes generated included ignitable, corrosive and chromium materials. The bulk of the hazardous waste generated was wastewater. Approximately 500,000 gallons of chromium/corrosive wastewater were generated annually. The Facility operated a hazardous waste container storage area and a 20,000-gallon above ground storage tank (AST) under a RCRA Part B Permit. The container area and the AST were closed in 2002 under PADEP oversight. The AST was subsequently used for storage of non-hazardous wastewater. The Facility also had three 20,000-gallon underground storage tanks (USTs) used for storing heating oil.

In May 2004, Betz notified PADEP that operations ceased, that the Facility was closed, and the Facility property was turned over to Hercules. Hercules hired a commercial property broker, and potential buyers were identified to use the facility for operations other than chemical processing. Since 2007, International Refrigeration Products, Inc. and National Refrigeration Products operate a warehouse and a machine assembly operation at the Facility. Neither entity is known to generate hazardous waste.

2.2 Areas of Investigation

Several investigation/remediation events were performed at the Facility between 1990 and 2005. In 1990, the investigations focused on releases from the three fuel oil USTs to the surrounding soil and groundwater. In 2003, Hercules conducted Phase I Environmental Assessment at the Facility. In 2005, Untied Refrigeration conducted a Phase II Environmental Assessment. Both of those reports concluded that no apparent adverse environmental impacts had occurred beyond those attributed to the USTs that were previously remediated. All soil and groundwater samples were analyzed for volatile organic compounds (VOCs) semi-volatile organic compounds (SVOCs) and metals.

Statement of Basis

Section 3: Summary of Environmental History

For all environmental investigations, groundwater concentrations were screened against federal Maximum Contaminant Levels (MCLs) promulgated pursuant to Section 42 U.S.C. §§ 300f et seq. of the Safe Drinking Water Act and codified at 40 CFR Part 141, or EPA Region III Screening Levels (RSL) for tap water for chemicals for which there are no applicable MCL. Soil concentrations were screened against EPA RSLs for residential soil and industrial soil.

Releases from the three fuel oil USTs (see Section 2) resulted in soil and groundwater contamination. The three USTs were removed in 1990 and associated contaminated soil from a leaking pipe was excavated at that time with follow-up monitoring and recovery of light non-aqueous phase liquid (LNAPL). Groundwater recovery was performed which removed 9535 gallons of water/oil. Approximately 1051 tons of soil were also excavated, treated and disposed off-site.

A 1993 Hydrogeologic Investigations Report (1993 Report), approved by PADEP, concluded soil and groundwater at the Facility were remediated (i.e., source removal was completed) and groundwater monitoring showed no detectable levels of benzene, toluene, ethylbenzene and xylenes (BTEX). Low levels of total petroleum hydrocarbons (TPH) remained in the soil and groundwater, however, there was a reduction in concentrations of those contaminants between post excavation sampling and the 1993 Report. TPH readily degrades into non-hazardous components in the soil and groundwater. To confirm efficacy of the remedial activity, four quarters of groundwater monitoring was completed (1993 to 1994). Monitoring showed no BTEX and declining concentrations of levels of TPH. PADEP gave the Facility approval to discontinue the groundwater monitoring in 1994.

In 2003, Hercules conducted Phase I Environmental Assessment at the Facility. In 2005, Untied Refrigeration conducted a Phase II Environmental Assessment. Both of those reports concluded that no apparent adverse environmental impacts had occurred beyond those attributed to the USTs that were previously remediated. All soil and groundwater samples were analyzed for volatile organic compounds (VOCs) semi-volatile organic compounds (SVOCs) and metals.

Analytical results for soils indicated no VOCs or SVOCs were detected in the soil samples at concentrations above the applicable PADEP Act 2 Non-Residential Statewide Health Standards (SHS) and Residential Surface Soil Medium Specific Concentrations (MSC) (lower of the direct contact surface soil or soil-to-groundwater value) numeric standard. Only one sample contained a metal exceeding an Act 2 SHS: arsenic was found at a concentration of 16.6 mg/kg which is slightly above the Residential SHS of 12 mg/kg, and slightly above EPA's Residential RSL of 0.68 mg/kg, but within EPA's established risk range for residential use.

Statement of Basis

Section 3: Summary of Environmental History (continued)

The analytical results for groundwater indicated no VOCs were detected in samples at concentrations above the applicable PADEP Act 2 Non-Residential, Used Aquifer MSC numeric standard. Bis(2-ethylhexyl)phthalate was the only SVOC detected at a concentration above the Act 2 Non-Residential, Used Aquifer MSC numeric standard. Two samples of bis(2-ethylhexyl)phthalate at concentrations of 7.9 and 7.2 ug/L, respectively, both only slightly above the MSC of 6 ug/L. Bis(2-ethylhexyl)phthalate is a common laboratory contaminant. Soil samples at these two locations showed only a trace concentration at one location and was not detected at the other. Bis(2-ethylhexyl)phthalate is most likely due to laboratory interference.

Dissolved manganese was the only metal detected above the Act 2 residential and non-residential SHS of 300 ug/L. Manganese concentrations ranged from 848 ug/L to 36,100 ug/L and exceeded the SHS standard in all samples. There is not a known source of manganese at the Facility. Based on a review of available dissolved manganese analytical results available from the United States Geological Survey (USGS) for wells completed in similar settings in Bucks, Montgomery, and Philadelphia counties, dissolved manganese concentrations ranged between 10 and 14,000 ug/L. Based on this review, EPA has determined that the manganese concentrations at the Facility represent natural conditions, and are not due to Facility-related activities. In addition, the manganese was detected at the Facility in the shallow aquifer, which is unsuited as a drinking water source due to its depth (8 to 20 feet across the Facility).

Based on the results of the environmental investigations, EPA believes that there are currently no adverse environmental impacts at the Facility from historical operations.

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 originally identified in groundwater have been remediated to below the detection limits of 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 has determined that the Facility met the migration of contaminated groundwater under control indicator on September 15, 2009. The EPA has determined that the Facility met the current human exposures under control indicator on September 16, 2009.

Statement of Basis

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: Linda Matyskiela
Phone: (215) 814-3420
Fax: (215) 814-3113
Email: Matyskiela.Linda@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 Ms. Linda Matyskiela. EPA will hold a public meeting to discuss this proposed decision upon request. Requests for a public meeting should be made to Ms. Linda Matyskiela.

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 Ms. Linda Matyskiela at the address listed above.

Date: 6.24.15



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

Figure 1: Map of Facility

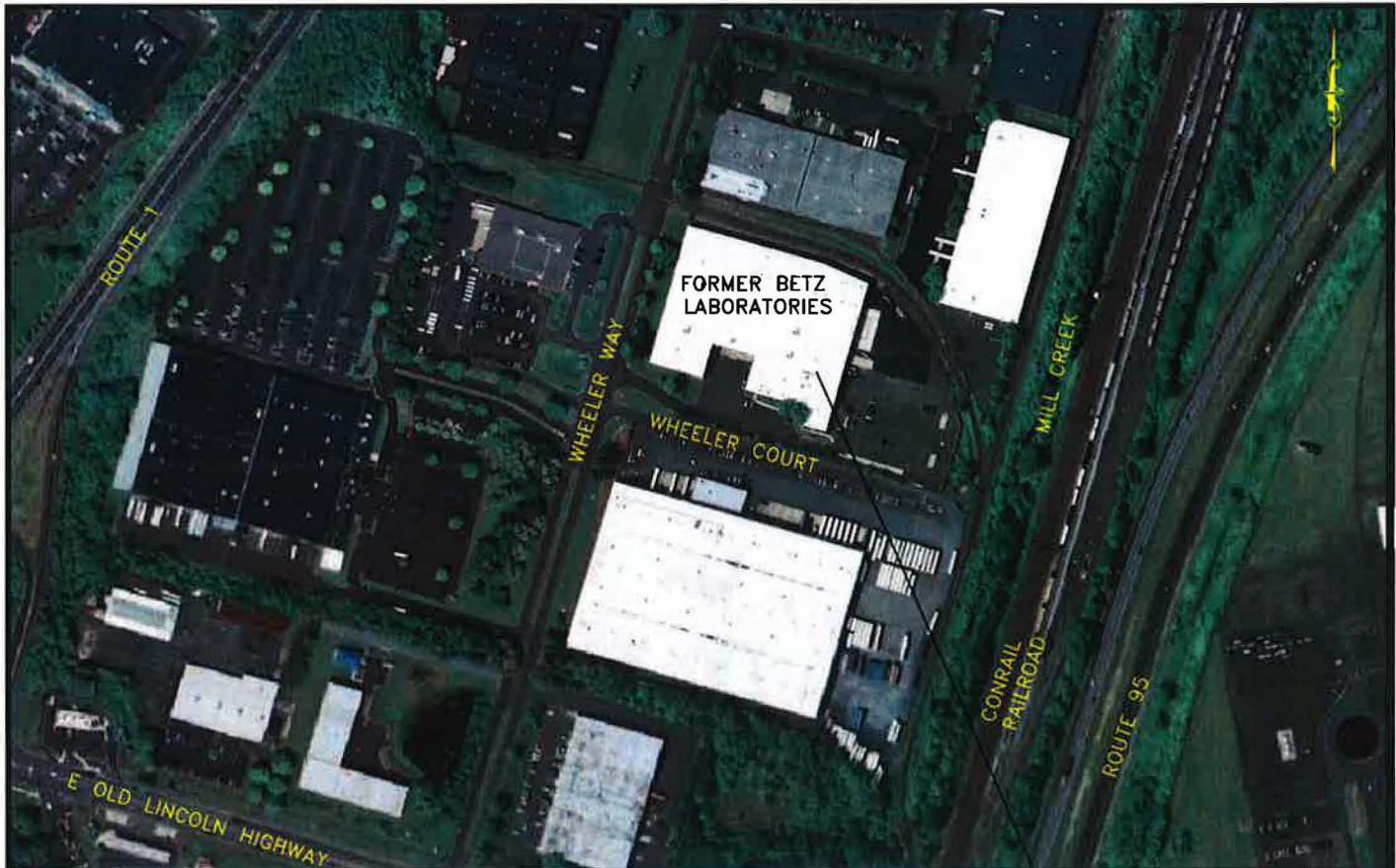
Statement of Basis

Index to Administrative Record

Former Betz Laboratories, Langhorne, PA
PAD000824805

1. RCRA Facility Assessment; AT Kearney for EPA, March 1989.
2. Certification of Closure of Hazardous Waste Facility; Betz Laboratories, Inc., February 8, 1991.
3. Hydrogeologic Investigation Report; BCM for Betz Laboratories, Inc., March 1993.
4. Baseline Sampling Program; URS Corporation for Hercules, Inc., February 21, 2003.
5. Permit Revocation and Bond Release; PADEP to GE Betz, February 26, 2003.
6. Summary of Phase II Activities, URS for United Refrigeration, Inc., September 16, 2005.
7. Final Environmental Indicator Inspection Report; Baker for EPA, May 2010

Statement of Basis



Source: Google maps

LAT=40°10'50.80"N
LON=74°53'55.09"W

SCALE: 1"=300'
S.O. NO.: 115297
DSN/DWN: JPK/RRR

DATE: MARCH 2010
FILE: 115297_LANG_02
CHK: JPK

Baker

MICHAEL BAKER JR., INC.
MOON TOWNSHIP, PENNSYLVANIA

FIGURE 1
FACILITY LOCATION MAP
FORMER BETZ LABORATORIES, INC.
985 WHEELER WAY, LANGHORNE, PENNSYLVANIA

