



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III

STATEMENT OF BASIS

LE-JO ENTERPRISES, INC.
PHOENIXVILLE, PENNSYLVANIA
EPA ID # PAD002915445

Prepared by
Office of Pennsylvania Remediation
Land and Chemicals Division
September 2013

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

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 Le-Jo Enterprises, Inc. facility located at 765 Pike Springs Road, Phoenixville, Chester County, Pennsylvania 19460 (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 Le-Jo Enterprises facility is an approximately 16-acre parcel located approximately 23 miles northwest of Philadelphia in the western section of Phoenixville, Pennsylvania.

The site is bound to the north by Route 113 and fairgrounds, to the east by commercial and residential properties, and to the west and south by residential area. A location map and a Facility layout are attached as Figures 1 and 2, respectively.

Pyroxylin Products, a manufacturer of coatings and adhesives, built the Facility in approximately 1961. Pierce and Stevens purchased Pyroxylin Products and the Facility in 1967. In 1995, Sherwin Williams purchased the owner of Pierce and Stevens, then sold the Facility to Sovereign Specialty Chemicals in 1996. In December 2004, Henkel purchased Sovereign Specialty Chemicals and the Facility. Throughout its ownership history, the Facility continued to be used to manufacture coatings and adhesives until December 2005, when operations ceased at the Facility.

Le-Jo Enterprises, a manufacturer of high-volume products for the foodservice and hospitality markets, purchased the Facility from Henkel in June 2006. Since this time, no hazardous materials have been generated at the Facility. Le-Jo Enterprises continues to use the Facility to manufacture, warehouse, and distribute primarily table oil lamps and kitchen tools for commercial markets.

Section 3: Summary of Environmental History

A 1990 Preliminary Assessment identified two Solid Waste Management Units (SWMUs) at the Facility. A 2005 Environmental Indicator (EI) Inspection Report provided updated information on these SWMUs and included additional areas of concern (AOCs) due to subsequent releases and remedial activities at the Facility. The table below describes these SWMUs/AOCs as well as their 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, groundwater, and surface water and covered the SWMUs/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) in soil and EPA's Maximum Contaminant Level (MCL) national primary drinking water standards for VOCs in groundwater and surface water.

SWMU/AOC	Description	Current status
Former Hazardous Waste Storage Area	Approximately 6000-sqft area active from 1961 to 1998 located in southwest corner of lacquer building with concrete floor and no berm or floor drains; stored 55-gallon drums of spent solvent wastes and off-spec product	No evidence of spills or releases observed or reported
Former Hazardous Waste Storage Building	Replaced former Hazardous Waste Storage Area; approximately 1300-sqft building open on one side and active from 1998 to 2005; located on eastern end of lacquer building	No evidence of spills or releases observed or reported
Former 5000-gallon Underground Storage Tank (UST)	Fuel oil tank located outside northwest corner of urethane building and used to heat Facility; removed in 1995; samples collected after excavation were below state UST cleanup standards for total petroleum hydrocarbons (TPH)	No further action required after 1995 removal and cleanup
Former 1000-gallon UST	Fuel oil tank located approximately 180 ft west of urethane building and used to heat an old farmhouse/Facility office; removed in 1995; one of three samples collected after excavation was slightly above state UST cleanup standards for TPH	Low levels of TPH remaining after 1995 removal and cleanup have likely been attenuated to levels below concern as a result of natural degradation processes
Former Aboveground Storage Tank (AST) Farm and Solvent Pump	Six 10,000-gallon, two 8000-gallon, and two 6000-gallon ASTs stored virgin solvent and one oil storage AST; active from 1961 to 2001, when AST farm was removed; toluene releases in 1990 and 1993 and possible inadequate tank farm construction suggested potential impact in this area; EPA conducted a focused sampling effort in this area in August 2013	Volatile organic compounds (VOCs) are below EPA's soil RSLs; sample results from perched groundwater showed no detections of any VOCs

Statement of Basis

Industrial Wastewater and Stormwater Discharges	One permitted outfall (Outfall 001; no longer active) for non-contact cooling water and one permitted outfall (Outfall 002) for stormwater; Outfall 001 monitored for trichloroethene (TCE) from 1992 to 2005 due to area-wide contamination from upgradient Superfund site; on-site stream also sampled for benzene, toluene, ethylbenzene, and xylenes (BTEX), oil and grease, and TPH in 1996	Concentrations of TCE, BTEX, oil and grease, and TPH either not detected or below EPA's MCL drinking water standards; no further action required
Facility Groundwater	No monitoring wells exist at Facility, but two production wells were installed in 1979 and sampled eight times between 1979 and 1991, showing some evidence of low-level chlorinated VOC contamination that was attributed to neighboring Superfund site; one of the production wells was sampled for BTEX, oil and grease, and TPH in 1996	Low levels of chlorinated VOC contamination attributed to Superfund site upgradient of Facility have likely been attenuated to non-detectable levels as a result of cleanup at Superfund site and natural degradation processes; BTEX, oil and grease, and TPH all below EPA's MCL drinking water standards

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 unacceptable risks to human health or the environment from hazardous constituents at this Facility.

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 these indicators on September 10, 2010.

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: 9/10/13

/John A. Armstead/

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

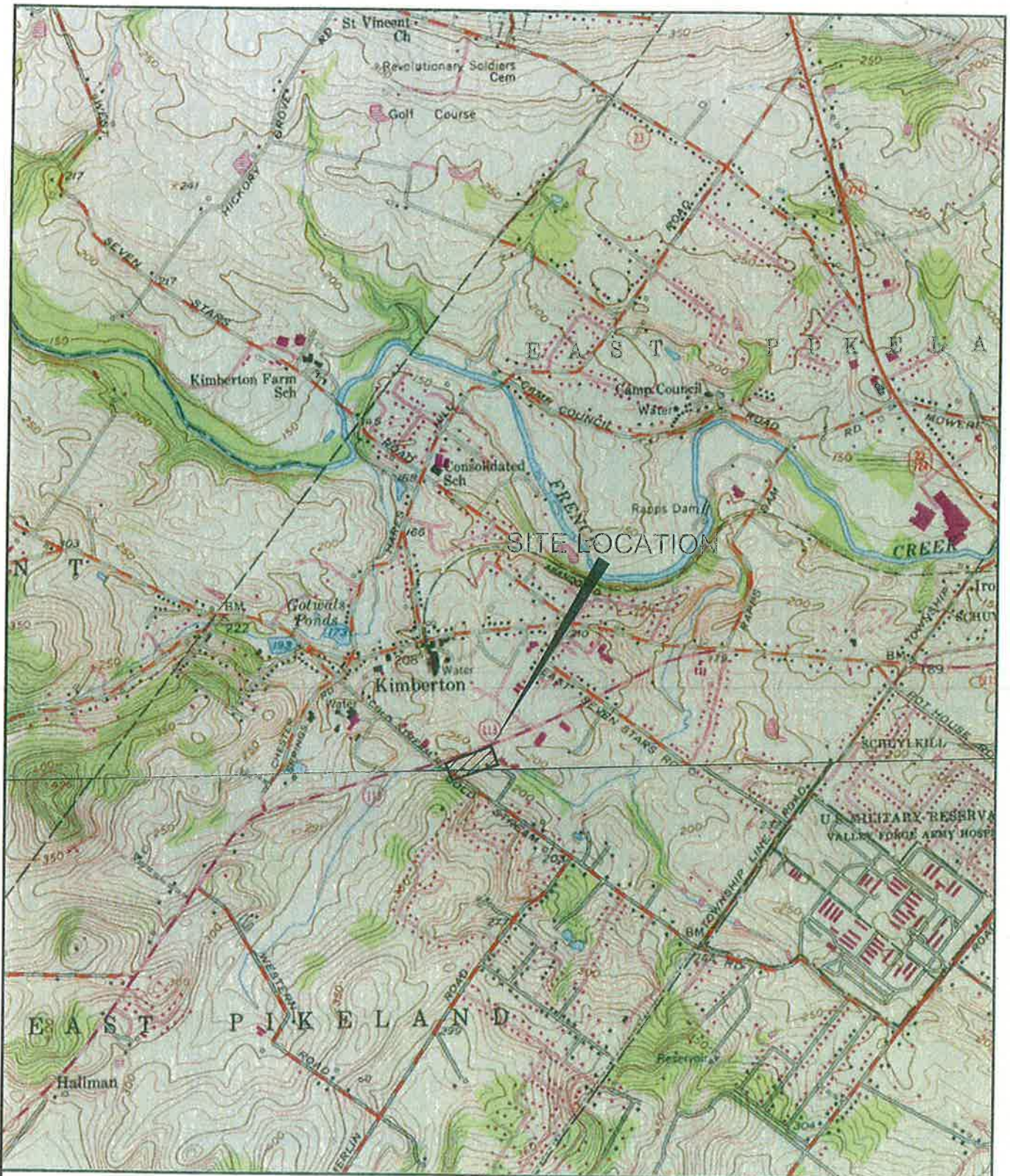
Statement of Basis

Index to Administrative Record

Environmental Priorities Initiative Preliminary Assessment of Pierce and Stevens Chemical, prepared by NUS Corporation, July 1990.

Final Environmental Indicator Inspection Report for Sovereign Specialty Chemicals, prepared by Tetra Tech EC, December 2005.

Field Investigation Letter Report for Le-Jo Enterprises, prepared by Baker, August 2013.



Quadrangle Location Map

0 2000 4000 Feet



Source: U.S.G.S. Topographic Maps (7.5 Minute)
Phoenixville, PA



Commonwealth of Pennsylvania
Department of Environmental Protection

**SOVEREIGN SPECIALTY CHEMICALS
PHOENIXVILLE, PA**

**FIGURE 1
SITE LOCATION MAP**



TETRA TECH EC, INC.

