



UNITED STATES

ENVIRONMENTAL PROTECTION AGENCY

REGION III

STATEMENT OF BASIS

MACK TRUCKS INC.

7000 ALBURTIS ROAD

MACUNGIE, PENNSYLVANIA

EPA ID NO. PAD 060493582

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I. Introduction

A. Facility Name

The United States Environmental Protection Agency (EPA) has prepared this Statement of Basis (SB) for the Mack Truck facility located at 7000 Alburdis Road, Macungie, PA 18062 (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 there are no current or unaddressed releases of hazardous waste or hazardous constituents from the Facility. Therefore, no further corrective action or controls are required at the Facility at this time. 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 January 2007.

C. Importance of Public Input

Before EPA makes a final decision on its Corrective Action Complete without Controls determination 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 Mack Trucks, Incorporated, Macungie Division facility is located in Lower Macungie Township, Lehigh County, Pennsylvania. It is situated at 7000 Alburtis Road, Macungie, Pennsylvania 18062. It is bordered by State Route 100 and is located a few miles north of the Borough of Macungie. In general, the surrounding area is rural. Adjacent land includes both commercial and undeveloped properties.

The property is approximately 283 acres in size. The Mack Trucks, Inc. assembly facility is located on the northern portion of the property. The central portion of the property consists of a grassy field in between an asphalt access road and parking lot. The southernmost portion of the property is partially wooded and undeveloped with an abandoned farmhouse located between the assembly plant and Swabia Creek. All of these features are located within the Mack Trucks property boundary.

The property contains a one million square foot truck assembly plant that has been active since 1975. Mack Trucks operates two assembly lines that use pre-manufactured truck parts, and four paint booths. In addition to the assembly plant, a sales and administrative office is associated with the facility. Several large storage areas and warehouses located within the plant are used to stockpile parts for truck assembly.

III. Summary of Environmental History

A. Notification

Hazardous wastes generated on site have been classified by the facility as including the following EPA RCRA waste identification numbers: D001 (ignitable), F003 (spent non-halogenated solvents), and F005 (spent non-halogenated solvents). The waste codes presented were derived from the facility's Notification of Hazardous Waste Activity, and Part A hazardous waste permit application and amendments. Lead-based paint was once used at the facility, producing D008 (lead) waste; however, the use of lead-based paint at the facility was discontinued in August 2004.

B. Description of Solid Waste Management Units (SWMUs) or Areas of Concern

SWMU No. 1 – Sump Associated With the Paint Spray Booth

The sump associated with the paint spray booth has been in use since 1975. No closure date has been set for this SWMU. No releases have been reported from this SWMU.

SWMU No. 2 – Wastewater Storage Tanks/Former Treatment Facility

This SWMU has been in operation since 1975. The wastewater treatment system was dismantled in 1986. The wastewater storage tanks are still operational. No releases have been reported from this SWMU.

SWMU No.3 – Paint Waste/Waste Solvent Storage Tank

The initial paint waste and solvent storage tank was put in service in 1988 and closed in April 2007. A new tank was installed and placed into service in April 2007. No closure date has been set for this SWMU. No releases have been reported from this SWMU.

SWMU No. 4 – Waste Oil/Spent Ethylene Glycol Storage Tank

This SWMU has been in operation since 1988. No closure date has been set for this SWMU. No releases have been reported from this SWMU.

SWMU No.5 – Drum Storage Area

This SWMU has been in operation since 1975. No closure date has been set for this SWMU. A violation for leaking drums was issued by PADEP during an August 11, 1981 RCRA inspection.

SWMU No. 6 – Roll-Off/Paint Sludge Storage

This SWMU has been in operation since 1988. No closure date has been set for this SWMU. No releases have been reported from this SWMU.

SWMU No.7 – Dumpster/Compactor

This SWMU has been in operation since 1975. No closure date has been set for this SWMU. No releases have been reported from this SWMU.

SWMU No. 8 – Wood Shredder/Compactor

This SWMU has been in operation since 1975. No closure date has been set for this SWMU. No releases have been reported from this SWMU.

SWMU No. 9 – Former Underground Storage Tank (removed in 1988).

This SWMU began operating in 1975. The tank was analyzed, purged, and removed at the end of October 1988. No releases have been reported from this SWMU.

C. Remedial Action to Date

In April of 1993, underground storage tank (UST) 001 was emptied and cleaned following the detection of a potential release. The tank was excavated and removed on August 24, 1994. Soil samples were collected and tested for Benzene, Toluene, Ethylbenzene, P-Xylene, M-Xylene, O-Xylene, and Total Petroleum Hydrocarbons (TPH) Gasoline Range Organics (GRO). All parameters were detected at one sample location. Remediation occurred and lowered the concentrations for all constituents, but not below the detection limits, with the exception of benzene. A Closure Report Form for this underground storage tank was submitted to PADEP on January 5, 1995.

On October 28, 1994, TTI Environmental, Inc. (TTI) submitted an Underground Storage Tank Closure and Corrective Action Report to PADEP on behalf of Mack Trucks, Inc. TTI was contracted by Mack Trucks to permanently close four regulated underground storage tanks at the Mack Trucks Assembly Plant. The USTs had a volumetric capacity of 15,000 gallons each, and contained Ethylene Glycol, SAE 20 engine oil, SAE 90 gear oil, and diesel fuel, respectively. The USTs were removed in conformance with American Petroleum Institute (API) Bulletins 1604 and 2105 as well as PADEP Technical Guidance Documents.

Mack Trucks operates two drinking water wells and a gas chlorinator on the property. Only one well is operating at a time, while the other well is on standby. The well that is pumping is routed through the gas chlorinator for disinfection of the water supply. These wells provide water for the Mack Truck Facility only. The facility currently employs a total of 540 people. The water from these wells is used for lavatories, drinking water, and facility process water. The wells are operated and tested under authority of Pennsylvania's Safe Drinking Water Act. These wells are sampled on a regular basis according to PADEP regulations.

IV. Evaluation of EPA's Proposed Decision

EPA's proposed decision that no further action or controls are needed at the Mack Truck facility is protective of human health and the environment. EPA's proposed decision represents a "Corrective Action Complete without Controls" as described in EPA Guidance found in the Federal Register / Vol. 68, No. 37 / Tuesday, February 25, 2003 / Notices [FRL – 7454-7] pages 8757 to 8764.

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 Mr. Grant Dufficy at the address listed below.

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

The Administrative Record contains all information considered by EPA when proposing a Corrective Action Complete without Controls determination for the Facility. The Administrative Record is available at the following location:

U.S. EPA Region III
1650 Arch Street
Philadelphia, PA 19103
Contact: Mr. Grant Dufficy (3LC30)
Phone: (215) 814-3455
Fax: (215) 814 - 3113
Email: dufficy.grant@epa.gov