UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III

STATEMENT OF BASIS

PRODUCTION COMPONENTS CORPORATION
(FORMER EATON LABORATIES, INC.)
LANSDALE, PENNSYLVANIA
EPA ID NO. PAD000431957

Prepared by
Office of Pennsylvania Remediation
Land and Chemicals Division
July 2012

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Section 1: Introduction

The United States Environmental Protection Agency (EPA) has prepared this Statement of Basis (SB) under the Corrective Action Program for the Production Components Corporation facility (formerly Eaton Laboratories, Inc.) located at 701-D West Fifth Avenue in Lansdale, Pennsylvania 19446 (Facility). 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.

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, our 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 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 is located at 701-D West Fifth Avenue in Lansdale Borough, Montgomery County, Pennsylvania on a 3.7-acre property (Site). The Site is bordered by railroad tracks to the northeast, North Cannon Avenue to the southeast, West 5th Street to the southwest, and North Mitchell Avenue to the northwest. Land use in the surrounding area includes commercial and residential properties. An aerial photograph depicting the location of the Site and a Site Map are attached to this SB as **Figures 1 and 2**, respectively.

The Site, owned by 701 West Associates LLC, is fully developed and occupied by two separate buildings (Building 1 and Building 2) and asphalt paved parking areas. Building 1 is located on West Fifth Street and is approximately 80,000 square feet and is divided into three separate suites. The northwest suite is leased to Production Components Corporation (PCC), the southeast suite is lease to Handelok Bag Company, and the remaining space is unoccupied. Building 2 is located on Mitchell Avenue directly north of Building 1. Building 2 is approximately 21,000 square feet and is divided into two separate suites. PCC leases the larger (12,000 square feet) suite and the smaller (9,000 square feet) suite is leased to Service Tire and Truck Center.

In 1978, Eaton Laboratories, Inc. (Eaton) was the first company to lease and operate out of the northwest suite of Building 1. Eaton manufactured textile chemicals, dry cleaning auxiliary chemicals, and maintenance chemicals (detergents and cleaners). As part of its manufacturing operations, Eaton used aromatic 150, kerosene, perchloroethene (PCE), 1,1,1-trichloroethane (TCA), and possibly trichloroethene (TCE). Eaton ceased operation in 1986. In 1990, PCC began leasing the northwest suite of Building 1 formerly occupied by Eaton.

PCC provides precision sheet metals services and uses conventional and computer controlled fabrication equipment to manufacture a variety of panels, enclosures, covers, frames, brackets, and cabinets. Materials for fabrication include steel, stainless steel, aluminum, and various other alloys. PCC also provides paint and powder coat finishing. PCC continues to lease the northwest suite in Building 1, in addition to the 12,000 square feet suite in Building 2. Administrative areas, as well as the sheet metal fabrication operations are located in Building 1. The Facility's paint line and phosphate cleaning system are located in Building 2.

Due to the prior operations conducted by Eaton, PCC is subject to EPA's Corrective Action Program. On August 8, 1980, Eaton submitted a Notification of Hazardous Waste Activity to EPA as a generator and storage facility. Eaton was subsequently assigned the EPA ID No. PAD000431957 on October 9, 1980 and granted interim status on December 8, 1980. Hazardous wastes generated and stored by Eaton included spent halogenated and non-halogenated solvents (F-listed) and discarded commercial chemical products (U-listed)

Section 3: Summary of Environmental History

On June 2, 2011, Michael Jr. Baker, Inc. (Baker) conducted an Environmental Indicator (EI) Inspection of PCC, on behalf of EPA. An EPA representative was present during the EI Inspection. The findings of the EI Inspection are documented in a November 2011 EI Inspection Report for PCC, prepared by Baker. The EI Inspection Report covers both past and present operations and provides a detailed environmental history for the Facility.

3.1 Description of Solid Waste Management Units

Three (3) Solid Waste Management Units (SWMUs) were identified at the Facility during the June 2011 EI Inspection. A brief description of each SMUW is provided below.

a) ***SWMU No. 1*** – Spent Solvent Waste Drum Area: One 55-gallon drum containing spent solvent (methyl ethyl ketone (MEK), toluene, and xylene) was observed in the Facility's flammable materials storage area at the time of the June 2011 site visit. The spent solvent is generated from cleaning of the Facility's spray paint guns and other painting equipment. The flammable materials storage area is an enclosed, explosion proof room located inside the northeast end of Building 2. The walls are painted concrete block with a concrete floor. The spent solvent is shipped off-site as a hazardous waste under the EPA Hazardous Waste Codes D001 (ignitable), F003 (spent non-halogenated solvents – xylene) and F005 (spent non-halogenated solvents – toluene, MEK). There are no known or suspected releases or environmental impacts associated with this unit.

b) ***SWMU No. 2*** – Waste Paint Related Materials Accumulation Area: The Facility stores drums containing waste paint filters and paper contaminated with paint overspray on the concrete floor in Building 2 adjacent to the paint booth. These waste materials are shipped off-site as a hazardous waste under the EPA Hazardous Waste Codes F003 (spent non-halogenated solvents – xylene) and F005 (spent non-halogenated solvents – toluene, MEK). There are no known or suspected releases or environmental impacts associated with this unit.

c) ***SWMU No. 3*** – Baghouse Dust Accumulation Area: The Facility operates two dust collectors (i.e., baghouses) which are located on the northwest wall of Building 1. The baghouse dust is collected in a 55-gallon drum and is disposed of as a municipal waste. This waste stream was determined to be non-hazardous in 1993 via a request by the Pennsylvania Department of Environmental Protection (PADEP). There are no known or suspected releases or environmental impacts associated with this unit.

3.2 Summary of Environmental Investigations and Remediation

The Site is located within the North Penn Area 6 Superfund Site which is largely a groundwater contamination problem encompassing the area in and around the Borough of Lansdale, Pennsylvania. The North Penn Area 6 Superfund Site was added to the National Priorities List (NPL) on March 31, 1989. TCE and PCE are the primary

contaminants in the groundwater, the chemical components of solvents and degreasers, although several other contaminants are present. Twenty-six facilities in the Lansdale area, including the former Eaton facility, were originally identified as possible sources of contamination due to their use of site-related solvents.

Potential soil and groundwater contamination occurring as a result of Eaton's operations was evaluated by Superfund during a 1991 Phase II RI/FS Focused Feasibility Study. Eight soil samples were collected from the Site and analyzed for volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), and pesticides/polychlorinated biphenyls (PCBs). Based on the results of the soil sampling, Eaton was not identified as a potential responsible party (PRP) for the extensive soil and groundwater contamination in the North Penn Area 6 Superfund Site. For more information regarding the North Penn Area 6 Superfund Site, please visit: http://www.epa.gov/reg3hwmd/super/sites/PAD980926976/index.htm

Although groundwater beneath the Facility property is known to be contaminated above appropriately protective risk-based levels (applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria), such groundwater contamination is not a result of releases subject to RCRA Corrective Action. The Site is located within an active Superfund Site that is actively addressing groundwater contamination in and around the Borough of Lansdale. There is no evidence to show that the former Eaton facility or PCC contributed to the North Penn Area 6 groundwater contamination. This determination is based on an evaluation of the former Eaton facility by Superfund in the early 1990s and an evaluation of the operations and hazardous materials managed by PCC under EPA's RCRA Corrective Action Program in 2011. EPA also took into consideration that the entire Site is covered with impermeable surfaces, such as, concrete slabs and asphalt paving which would inhibit a release of hazardous waste or constituents to site soils and groundwater.

Based on a review of all available records, in addition to discussions with Facility representatives during a June 2011 EI Inspection, EPA has determined that there are no unacceptable human exposures to contamination (i.e., contaminants in concentrations in excess of appropriate risk-based levels) that can be reasonably expected under current land- and groundwater-use conditions. There have been no reportable releases, no instances or evidence of soil or groundwater contamination, no site remediation, and no past, current, or planned monitoring efforts necessary at this Facility. All documents on which EPA's proposed decision is based are contained in the AR and available upon request.

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 April 19, 2012

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: Jeanna R. Henry
Phone: (215) 814-2820
Fax: (215) 814-3113
Email: henry.jeannar@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. Jeanna R. Henry. EPA will hold a public meeting to discuss this proposed decision upon request. Requests for a public meeting should be made to Ms. Jeanna R. Henry.

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. Jeanna R. Henry at the address listed above.

Date: 7/19/12

Abraham Ferdas, Director
Land and Chemicals Division
US EPA, Region III

Environmental Priorities Initiative, Preliminary Assessment of Eaton Laborites, Inc., NUS Corporation, May 11, 1990.

Final Environmental Indicator Inspection Report for Production Components Corporation, 701-D West Fifth Street, Lansdale, Pennsylvania 19446, Baker, November 2011.

North Penn Area 6, Phase II RI/FS and FFS Work Plan, CH2M, June 1991.

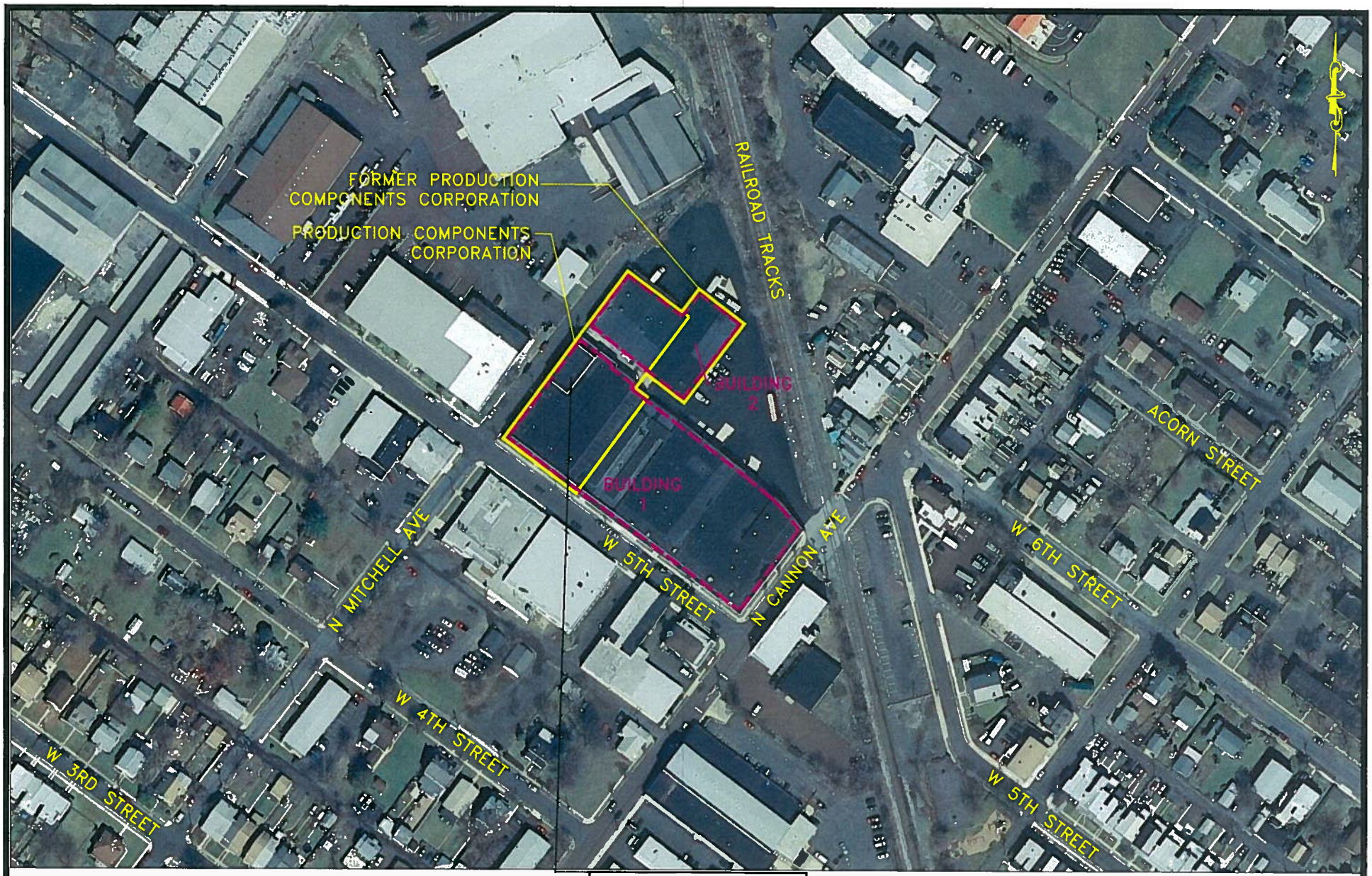
North Penn Area 6, EPA Superfund ROD, September 29, 1995.

North Penn Area 6, RI/FS Report, Groundwater OU 3, Black & Veach, August 1999.

North Penn Area 6, EPA Superfund ROD, August 10, 2000.

FIGURE 1

FACILITY LOCATION MAP



Source: PAMAP 2008
www.pamap.pasda.psu.edu

LAT=40°15'01.08"N
LON=75°17'18.45"W

200 0 100 200
1 inch = 200 ft.

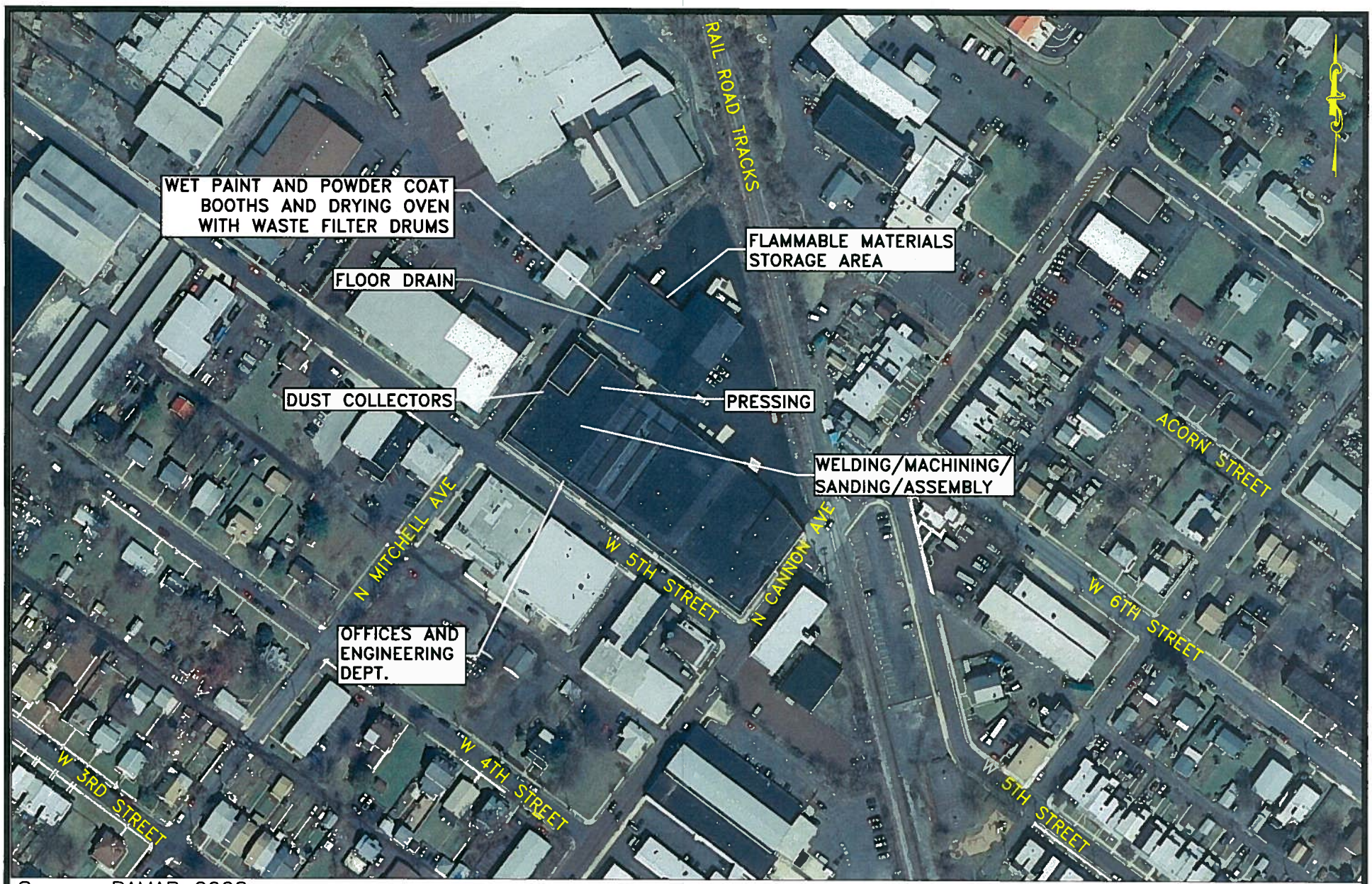
SCALE: 1" = 200'	DATE: NOVEMBER 2011
S.O. NO.: 120687	FILE: 120687-PCC_01
DSN/DWN: AAF/RRR	CHK: SF

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

FIGURE 1
FACILITY LOCATION MAP
PRODUCTION COMPONENTS CORPORATION
LANSDALE, PENNSYLVANIA

FIGURE 2

FACILITY SITE MAP



Source: PAMAP 2008
www.pamap.pasda.psu.edu

200 0 100 200
1 inch = 200 ft.

SCALE: 1" = 200'	DATE: NOVEMBER 2011
S.O. NO.: 120687	FILE: 120687-PCC_02
DSN/DWN: AAF/RRR	CHK: SF

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

FIGURE 2
FACILITY LAYOUT, PRODUCTION COMPONENTS CORPORATION
PRODUCTION COMPONENTS CORPORATION
LANSDALE, PENNSYLVANIA