



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III
STATEMENT OF BASIS
SENSIENT TECHNICAL COLORS
GIBRALTAR, PENNSYLVANIA
EPA ID NO. PAD 002 917 466

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ACRONYMS

AOC	Area of Concern
CFR	Code of Federal Regulations
COE	U.S. Army Corps of Engineers
EPA	Environmental Protection Agency
GPRA	Government Performance and Results Act
IC	Institutional Control
IM	Interim Measure
PADEP	the Pennsylvania Department of Environmental Protection
RCRA	Resource Conservation and Recovery Act
SB	Statement of Basis
SWMU	Solid Waste Management Unit
U.S.C.	United States Code

I. Introduction

The Sensient Technical Colors, Incorporated¹ Facility (hereinafter referred to as the “Facility”) located in Gibraltar, Pennsylvania 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 facilities have investigated and cleaned up any releases of hazardous waste and hazardous constituents that have occurred at their property.

The United States Environmental Protection Agency (“EPA”) has prepared this Statement of Basis (“SB”) to describe investigation results and remedial actions performed at the Facility. This SB is based on a comprehensive review of soil and groundwater sampling activities, past and present environmental practices, historical investigations and remedial activities. Consistent with EPA’s February 2003 document, *Final Guidance on Completion of Corrective Action Activities at RCRA Facilities* (reference 68 FR 8757), EPA is making a determination of “Corrective Action Complete with Controls.” The guidance recommends that EPA make this determination where the full set of corrective measures has been implemented and all that remains is performance of required operation and maintenance and monitoring actions and/or compliance with and maintenance of any institutional controls. The purpose of this document is to provide a detailed account of environmental activity for interested parties to review and subsequently provide input to EPA prior to making its final remedy decision.

In the Commonwealth of Pennsylvania, EPA has delegated most of the RCRA permitting program to the Pennsylvania Department of Environmental Protection (“PADEP”) based upon promulgated State regulations which are equivalent to, or more stringent than, the federal requirements. EPA has not yet delegated the RCRA corrective action requirements, under which this Statement of Basis has been prepared, to PADEP. In Pennsylvania, EPA administers the RCRA Corrective Action program with authority to require environmental investigations and remedial actions at any Facility that applies for a hazardous waste operating permit or otherwise operated under RCRA interim status. Since this Facility has primarily been remediated under the direction of PADEP, this SB reflects closure activities performed in conjunction with PADEP’s requirements.

This document summarizes information that can be found in greater detail in the work plans and reports submitted by the Facility to EPA and PADEP. To gain a more comprehensive understanding of the RCRA activities that have been conducted at the Facility, EPA encourages the public to review these documents, which are found in the Administrative Record. The Administrative Record is available at the following location:

¹ The exact period of ownership is unknown, however, it is known that from at least 1962 to 2001, the Crompton and Knowles Corporation owned and operated the site. On 30 Nov 2001, Warner-Jenkinson Company, Inc. a predecessor of Sensient Colors, Inc., acquired the Gibraltar, PA facility from CNK Chemical Reality Corporation, a subsidiary of Crompton and Knowles Corporation. Sensient Colors, Inc. currently owns the site, however, operations ceased in August, 2003. Sensient Colors, Inc. retains the environmental liability.

U.S. EPA Region III
1650 Arch Street
Philadelphia, PA 19103

Further information can also be obtained by contacting the EPA Project Manager:

Mr. Kevin Bilash (3WC22)
Phone: (215) 814-2796
Fax: (215) 814-3113
Email: bilash.kevin@epa.gov

EPA will address all significant comments submitted in response to the proposed remedy. EPA will make a final remedy decision and issue a Final Decision and Response to Comments after information submitted during the public comment period has been considered. If EPA determines that new information or public comments warrant a modification to the proposed remedy, EPA may modify the proposed corrective measures or select other alternatives based on such new information and/or public comments. Therefore, the public is encouraged to review and comment on the corrective measures described in this document and/or any additional options not previously identified and/or studied. The public may participate in the remedy selection process by reviewing the Statement of Basis and documents contained in the Administrative Record and submitting written comments to EPA during the public comment period. Public participation is discussed in more detail in Section XII.

II. Facility Background

The Facility is located 2529 Main Street, approximately one mile east of the town of Gibraltar and five miles southeast of Reading, in Robeson Township, Berks County, Pennsylvania. The 147-acre site is located along the south bank of the Schuylkill River, which flows into the Delaware River. During its roughly 40-year operation, the Facility produced chemical dyes (i.e. industrial dyes and pigments). Production at the Facility ended in August, 2003. Refer to Attachment 1 for a site location map.

The Facility manufactured industrial dyes utilizing various aqueous chemical production processes. Production products have remained similar over the years. Wastewater solids from the plant processes have historically contained chromium which is the main contaminant of concern at the site. EPA issued a hazardous waste exemption for the chromium since the waste contained trivalent chromium and was not considered hazardous after 40 CFR 261.4(b)(6)(i) was modified. This exemption was not recognized by PADEP prior to 1995. In 1997, after PADEP adopted federal regulations, Sensient ceased removing Chromium from their waste stream due to the waste no longer being classified as hazardous.

The regulatory history has varied with the progress of environmental regulations and requirements. Until the late 1970's, the Facility disposed of their wastewater treatment solids via ocean dumping. This process was discontinued and the Facility constructed impoundment

structures to handle waste materials. Impoundments 1(main) and 2(backup) were constructed in the late 1970's. Waste Impoundments 3 and 4 were constructed in the 1990's. Impoundment 4 was segregated into two receiving cells, 4A and 4B. Impoundments 3 and 4A were subsequently consolidated into 4B. All impoundments have been stabilized and closed in accordance with PADEP requirements and with PADEP approval. The final impoundment, 4B, received final closure certification on November 29, 2005.

III. Summary of Environmental Investigations Reviewed

An Environmental Indicator (EI) Inspection Report for the Facility was prepared and submitted by the U.S. Army Corps of Engineers (COE) on February 22, 2002. The report includes a comprehensive record search and review conducted by the EPA and the COE. This undertaking consisted of evaluating the Facility's manufacturing operations and waste management practices, RCRA permit applications, historical spills and releases, documentation of previous site inspections, RCRA closure activities and correspondence between the EPA, PADEP and the Facility. A list and description of all the Areas of Concern (AOCs) and Solid Waste Management Units (SWMUs) identified during this report can be found in Section V. After review, EPA has concluded that all SWMUs and AOCs have been satisfactorily remediated and no further investigation or corrective action is required at the Facility at this time. Further, routine maintenance and monitoring will continue under the authority of PADEP. Financial Assurance in the form of a Letter of Credit is also established. This money will be used to ensure that appropriate post-closure activities continue in the event that the owner becomes financially unviable.

The facility submitted a Final Report to PADEP in September 1999. This report summarized the Remedial Investigation (RI) report, Risk Assessment (RA) report, and Cleanup Plan submitted to PADEP in May 1999. The Final Report was completed using the Pennsylvania Act 2 Program which provides technical guidance and administrative processes for facilities to demonstrate cleanup. The following areas were addressed:

- Site-wide groundwater;
- Soil in the Wetland Area;
- Soil in the Remediated Area; and
- Soil in the Former Burn Pit/Sump Area.

The report concluded that all reported constituents in groundwater and soil were below their respective Site-Specific standards for the Gibraltar Facility; therefore, remediation is not required at the site. The Site-Specific standards are developed using detailed site information and a rigorous scientific evaluation of a remedy to provide a protective cleanup standard unique to that site. The site-specific standard approach addresses future use by including property use limitations in a deed notice. The Facility received an approval on December 6, 1999 effectively granting a Pennsylvania Release from Liability for the areas addressed in this report.

The RA report included an evaluation of both human health and ecological risks. All available soil data and groundwater data from 1995 through 1998 (depicting current conditions) were used for the human health evaluation. This analytical data was compared with the

Statewide standards. Additionally, estimated in-stream surface water concentrations were compared to applicable surface water quality standards. A fate and transport analysis found direct contact with Arsenic in the Wetland Area soils and groundwater discharge to surface water to be the only complete exposure pathways at the Facility. The only category of ecological receptor on the property is an on-site Wetland area. An evaluation of options determined that implementation of wetland remedial activities pose a great ecological threat to the ecology of the wetland, thus, preservation is selected was suggested as the mitigative remedy. Further discussion of the Wetland area can be found in Sections V, VI, and VIII. Key conclusions of the Risk Assessment were:

- There is no off-site migration of groundwater constituents toward any area where groundwater is used for drinking or agricultural purposes;
- The former Burn Pit/Sump Area was the source for contamination of groundwater at and downgradient of Impoundment #1;
- The remediation of a former waste disposal lagoon (i.e., the Remediated Area) mitigated the releases to groundwater in that area; and
- Historical discharge of stormwater to the Wetland Area was not a source of groundwater contamination.

IV. Previous Investigations

As mentioned previously, this Facility has been remediated under the direction of PADEP in conjunction with PADEP's requirements. A complete list of previous investigations will not be included in this SB due to the voluminous nature of the information. A partial discussion of the investigations, interim measures, and remedial actions can be found in Section V. A more complete and detailed investigatory history of the site, including all previous investigations, may be found filed at the following location:

Pennsylvania Department of Environmental Protection
SouthCentral Regional Office
909 Elmerton Avenue
Harrisburg, PA 17110
Phone: (717) 705-4732

V. Interim Measures/Remedial Actions

The Facility has performed closure activities in conjunction with the State of Pennsylvania requirements or has participated in the Land Recycling and Environmental Remediation Standards Act (Act 2) for the following SWMUs: closure of the initial main impoundment (SWMU#1), Impoundments 1 and 2 (SWMU#7), remediation of the wetland/swamp area (SWMU#9), the area of buried on-site drum wastes (SWMU#11), the waste solvent collection trailer (SWMU#13), the hazardous waste storage area (SWMU#16), two (2) fuel tanks (SWMU#17), the burning pit (SWMU#21), and the west berm collector (SWMU#28). A brief description of Interim Measures/Remedial Actions on these units as required due to previous handling of hazardous waste is described below. Note that all other SWMU's identified were investigated and determined not to be an area of concern (AOC) or not require any interim

measures/remedial actions.

1. SWMU#1: This used to be the former waste disposal lagoon which was located in the eastern river floodplain and wetland area. It was remediated in the fall of 1993 and the summer of 1994. Chromium has declined since the remediation of this area, falling below the Act 2 (and EPA) standard of 0.100 mg/L in December, 1994 and continuing to non-detect today. It was addressed under the Act 2 program and received a release from liability on December 6, 1999 upon the approval of the Final Report from PADEP.

2. SWMU#7: The Facility constructed these two waste impoundments after ocean dumping of the production wastewater sludges was discontinued. Impoundment 1 was closed in 1990 using a stabilization process of fly ash and lime and the installation of a High Density Polyethylene ("HDPE") Liner cover and soil cap. Impoundment 2 underwent closure activities in 1991 and was stabilized, capped and closed. Both impoundments were closed in accordance with PADEP guidelines and include groundwater monitoring.

3. SWMU#9: A wetland area is located on the east side of the Facility parcel. A major spill event reportedly occurred in March of 1983 during which colored waters were seen impacting the wetland area. Investigative studies were conducted in 1994 and 1995. The wetlands area was addressed under the Act 2 program. An Ecological Risk Assessment was conducted in 1999 and indicated metals (arsenic, mercury, iron, and lead) were above Statewide Health Standards but were not a risk because these contaminants are not mobile or bio-available, a complete exposure pathway does not exist, and that impacts would be insignificant. This area received a release from liability on December 6, 1999 upon PADEP's approval of the Act 2 Final Report.

4. SWMU#11: During Hurricane Agnes in 1972, the Schuylkill River flooded and thousands of drums that were displaced from numerous facilities were staged on the Facility property to await final disposal. When disposal option failed to materialize, personnel reportedly buried these drums (most were empty and of cardboard construction) in the eastern woodland area. During 1993 and 1994, the drum disposal area was excavated and any affected drum remains and soils were properly disposed of. This area was addressed and under the Act 2 program and received a release from liability on December 6, 1999 upon the approval of the Final Report from PADEP.

5. SWMU#13: A stainless steel hazardous waste solvent collection trailer capable of holding 5,000 gallons received waste solvent from the production process and remained in place as a permanent tank. It was contained in a concrete containment structure to provide greater than 100% of the volume. A solvent tank closure plan was submitted in July 1992 and approved by PADEP on March 31, 1993. On April 4, 1995, PADEP issued an approval letter concurring that this SWMU was closed in accordance with the approved closure plans.

6. SWMU#16: This was a hazardous waste storage pad that was used to store RCRA hazardous wastes prior to off-site shipment. During an expansion to meet the requirements for a RCRA Part B Operating Permit, a xylene spill was identified under the pad and a remediation program was conducted. PADEP issued a closure approval for this drum storage pad in April

1995.

7. SWMU#17: One underground storage tank (UST) that held No. 6 fuel oil was removed in June 1987, had the soil sampled, and was shown to be absent of leakage. The other UST that held No. 2 fuel oil was closed in-place in May 1995. An Underground Storage Tank Closure Report for the No. 2 fuel oil tank was submitted to PADEP in July 1995 for approval.

8. SWMU#21: The burn pit was located near Impoundment 1 and was used to burn various wastes such as pallets, fiber drums, salt bags, and office trash. At the request of PADEP in the early 1980s, Crompton discontinued this activity and the pit was excavated, backfilled with clay, and paved over. This area received a release from liability on December 6, 1999 upon PADEP's approval of the Act 2 Final Report.

9. SWMU#28: A leachate collection system, called the west berm collector, was active in Impoundment 2 for the recovery of bottom spoils forced to the surface due to static load pressure. The system was removed and closed as part of the Impoundment 2 closure action. PADEP issued a letter on November 8, 1996 concurring closure was in accordance with the approved closure plan.

VI. Description of Contaminated Media

A. Soil – The RA document indicated that, with respect to soils, all detected constituents met the Act 2 Statewide Health Standards with the exception of arsenic, diphenylamine and o-toluidine. Arsenic exceeded the direct contact standard and diphenylamine and o-toluidine exceeded the soil to groundwater standard. The soil to groundwater exposure pathway does not represent a complete exposure pathway because there is no complete exposure pathways associated with groundwater use. However, direct contact with arsenic in the wetland soils was determined to be the only potentially complete exposure pathway with soil. Thus, a human health site-specific standard for arsenic in wetland soils was calculated as 366 mg/kg. The maximum reported concentration of arsenic in the Wetland Area was 120 mg/kg which is less than the human health site-specific standard.

A complete exposure pathway that could impact ecological organisms does not exist in the Site's wetlands because the contaminants detected are not mobile or bioavailable. The upper groundwater aquifer is separated from the wetland soils by a clay layer. The high clay and Total Organic Carbon content is a condition that renders the contaminants in a form that are not bioavailable. The clay particles and organic matter in the wetland bind-up the metallic cations. Insoluble metallic oxides, hydroxides and sulfides then precipitate out and are inert. Likewise the formation of oxides of iron and manganese limit solubility and mobility of metals. This attests to the fact that a wetland is a natural system which function is to provide filtering and sorption of compounds. Thus, an ecological site-specific standard was not calculated.

B. Groundwater - Discharge of groundwater to surface water represents a complete exposure pathway; therefore, Site-Specific groundwater standards were developed to determine if concentrations of site constituents protect human health and the environment based on site-specific information. At the time most of the reports reviewed were generated (mid to late

1990's), all reported concentrations of the groundwater constituents were less than the site-Specific standards developed as part of the RA under Act 2. The most recent groundwater quality data confirms that this trend continues and most constituents have actually decreased to non-detect. Currently, no regulated constituents in the groundwater exceed the Act 2 standards. Several major ions (chloride, sulfate, iron, and manganese) exceed their secondary MCL's in groundwater. However, their impacts on drinking water are considered aesthetic and are not health concerns.

VII. Institutional Controls

Institutional Controls (ICs) are non-engineered instruments such as administrative and/or legal controls that minimize potential for human exposure to contamination by limiting land or resource use. On December 6, 1999, PADEP approved the Act 2 final report that was submitted on October 5, 1999. The final report demonstrated attainment of the site specific standard which means there are onsite locations that contain contaminants in subsurface areas above acceptable standards but below calculated risk based values particular to this site. Included in the final report was the proposed deed restriction which required notice to the deed upon the approval date.

The specific requirements of the deed restriction state that:

- a. The use of the property shall be restricted to non-residential uses only.
- b. Shallow groundwater at the Property shall not be used for potable purposes or in any other manner which could increase the risk of exposure to contaminants by humans or the environment without the express approval of PADEP.

X. Proposed Remedy Performance Standards

EPA is making a determination of "Corrective Action Complete with Controls" as the proposed remedy for the Sensient Technical Colors, Incorporated Facility. Groundwater monitoring as per the requirements of PADEP's Residual Waste Landfills and Disposal Impoundments (Form 14R) for the closed surface impoundments will be the "controls" to assure all reported concentrations of the groundwater constituents remain below the Site-Specific standards. The current post-closure monitoring plan requires quarterly (four times per year) sampling of the monitoring well network. Refer to Attachment 2 for a well location map. The following is a list of the wells that require quarterly monitoring:

Monitoring Wells		
MW-1	MW-8	MW-15
MW-2	MW-10	MW-16
MW-4	MW-11	MW-17
MW-5	MW-12	MW-18
MW-6	MW-13	MW-19
MW-7	MW-14	MW-21

VIII. Summary of Facility Risks

A. Potential Receptors in Contact with Soil – A fate and transport analysis was prepared for the RA report and identified one potentially complete exposure pathway of direct contact with arsenic contaminated soil. Thus, a Site-Specific Standard in the Wetland Area soils was developed under Act 2. The maximum reported concentration was less than the calculated standard. The IC in place will ensure pathway elimination into the future.

B. Potential Receptors in Contact with Groundwater – The exposure to constituents by way of potable and/or industrial use of groundwater does not represent a complete exposure pathway. The IC in place will ensure pathway elimination into the future.

C. Potential Receptors for Surface Water – The only complete exposure pathway with groundwater was discharge to surface water. Thus, Site-Specific standards were developed to protect this pathway. No site-related constituent exceeded its Site-Specific Standard.

D. Ecological Risks – An Ecological Risk Assessment was conducted in accordance with Act 2 guidance. The only category of ecological receptor on the property is an on-site Wetland area. Sources of contaminants to the wetland were eliminated but four metals (arsenic, mercury, iron, and lead) exceeded the screening and an assessment of potential impacts was conducted. Due to these contaminants being neither mobile nor bioavailable, it was determined the impacts would be insignificant.

IX. Environmental Indicators

Under the Government Performance and Results Act (GPRA), EPA set national goals to address high priority RCRA corrective action facilities by the year 2005. EPA was tasked with evaluating the two key environmental clean-up indicators for each Facility: (1) Current Human Exposures Under Control and (2) Migration of Contaminated Groundwater Under Control.

JCBGI is one of Region III's high priority facilities and falls under this initiative. An Environmental Indicator Inspection Report was performed and a final draft submitted on February 22, 2002. On August 22, 2002 and June 22, 2004, the EPA determined that the Facility has met both the Human Exposures Under Control and Migration of Contaminated Groundwater environmental clean-up indicators, respectively.

XI. Evaluation of EPA's Proposed Remedy Selection

The remedy proposed in this SB best meets the four threshold criteria (overall protection, attainment of media cleanup objectives, source control, and compliance with waste management standards) for corrective measures and the five remedy selection decision factors or balancing criteria (long-term reliability and effectiveness; reduction in toxicity, mobility or volume; short

term effectiveness; Implementability; and cost).² The following discussion outlines EPA's determination for the remedy proposed at the Facility.

A. Overall Protection - This overarching standard requires remedies to include those measures that are needed to be protective, but are not directly related to other factors. The proposed determination of "Corrective Action Complete with Controls" meets this standard. The risk assessment identified complete exposure pathways for human health and ecological consideration. The final report demonstrated proof that Site-Specific Standards were met and proposed deed restrictions that will ensure pathway elimination into the future. These deed restrictions are currently in effect.

B. Attainment of Media Cleanup Standards - The most recent groundwater quality data confirms that all reported concentrations of the groundwater constituents were less than the Site-Specific Standards developed as part of the RA under Act 2 and that most constituents have decreased to non-detect.

The maximum reported concentration of arsenic in the Wetland Area was 120 mg/kg which is less than the Site-Specific Standard of 366 mg/kg.

C. Controlling Source of Releases - The sources of releases have been identified and contained as discussed in Sections IV and V. Production at the Facility ended in August, 2003, and is currently vacant. There is no hazardous waste remaining at the Facility that could be in jeopardy of causing a release to the environment.

D. Complying with Standards for Management of Waste - The proposed determination of "Corrective Action Complete with Controls" is a continuation of the waste management practices employed at the facility thus far under the guidance of PADEP. All corrective actions performed at the Facility have been in compliance with all applicable federal, state and local regulations during corrective measures implementation to ensure that the waste was managed in a protective manner.

E. Long-Term Reliability and Effectiveness - The long-term reliability and effectiveness standard is intended to address protection of human health and the environment over the long term. Source removal and control approaches that remove and/or consolidate remediation wastes in engineered structures or systems that protect against future releases are more reliable, and therefore preferred over those that offer more temporary, or less reliable controls. The corrective measures meet this criterion because they included source removal in addition to the constructed engineered structures (waste impoundments) which result in long-term protection.

² The criteria used to analyze the proposed remedy are set forth in OSWER guidance document, Guidance on RCRA Corrective Action Decision Documents Directive Number 9902.6, February 1991, and the May 1, 1996 ANPR.

F. Reduction of Toxicity, Mobility or Volume of Waste - Reduction of toxicity, mobility, or volume is directly related to the concept of long-term remedies. For this criterion, remedies that employ treatment and/or source removal and containment that are capable of permanently reducing the overall risk posed by the remediation wastes are preferred. The source removal and source controls integral to the proposed corrective measures allow the remedy to meet this criterion because they reduce the mobility and areal extent of contaminated media. The impoundments contain the hazardous waste and thus reduce mobility. The source removal during remediation efforts conducted under PADEP's guidance contributes to reducing risk to human health and the environment. Overall, the efforts taken at this Facility have resulted in meeting this criterion.

G. Short-Term Effectiveness - The short-term effectiveness standard is intended to address hazards posed during the implementation of corrective measures. Short-term effectiveness is designed to take into consideration the impact to site workers and nearby residents during construction. Examples of hazards addressed by this standard include the potential for volatilization of organic contaminants, the spread of contamination through dust generation, and hazardous materials spills resulting from waste loading and transport operations. Corrective measures have been completed and the Facility is no longer in operation, therefore short-term hazards no longer exist.

H. Implementability - The Implementability decision factor addresses the regulatory constraints in employing the cleanup approach. The Facility has passed through the Act 2 Program and received a Release of Liability for the areas addressed in the report. Remediation of the SWMU's has been completed and Implementability is no longer a factor for the consideration of this Statement of Basis.

I. Cost - EPA's overriding mandate under RCRA is protection of human health and the environment. However, EPA believes that relative cost is a relevant and appropriate consideration when selecting among alternatives that achieve the cleanup requirements. EPA's experience in the Superfund program has shown that in many cases several different approaches will offer equivalent protection of human health and the environment, but may vary widely in cost. EPA has stated its belief that it is appropriate in these situations to allow cost to be one of the factors influencing the decision for selecting among the alternatives. The proposed determination of "Corrective Action Complete with Controls" provides a cost-effective approach for the conditions that exist at the Facility.

XII. Public Participation

EPA is requesting comments from the public on its proposal that Corrective Action Complete with Controls will be required at this Facility at this time. The public comment period will last thirty (30) calendar days from the date that this Statement of Basis is published in a local newspaper. Comments may be sent to EPA in writing at the EPA address listed below.

A public hearing will be held upon request. Requests for a public hearing should be

made to Mr. Kevin Bilash of the EPA Regional Office (215-814-2796). A hearing will not be scheduled unless one is requested.

The Administrative Record contains all information considered by EPA when making this proposal to require Corrective Action Complete with Controls at the Facility at this time.

The Administrative Record is available at the following location:

U.S. EPA Region III
1650 Arch Street
Philadelphia, PA 19103
Contact: Mr. Kevin Bilash (3WC22)
Phone: (215) 814-2796
Fax: (215) 814 - 3113
Email: bilash.kevin@epa.gov

After evaluation of the public's comments, EPA will prepare a Final Decision Document and Response to Comments that identifies the final selected remedy. The Response to Comments will address all significant written comments and any significant oral comments generated at the public meeting, if requested. This Final Decision Document and Response to Comments will be made available to the public. If, on the basis of such comments or other relevant information, significant changes are proposed to be made to the corrective measures identified by EPA in this SB, EPA may seek additional public comments. The final remedy will be implemented using available legal authorities possibly including, but not necessarily limited to, RCRA Section 3013, 42 U.S.C. 6974.

Date

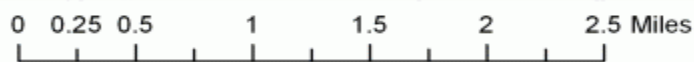
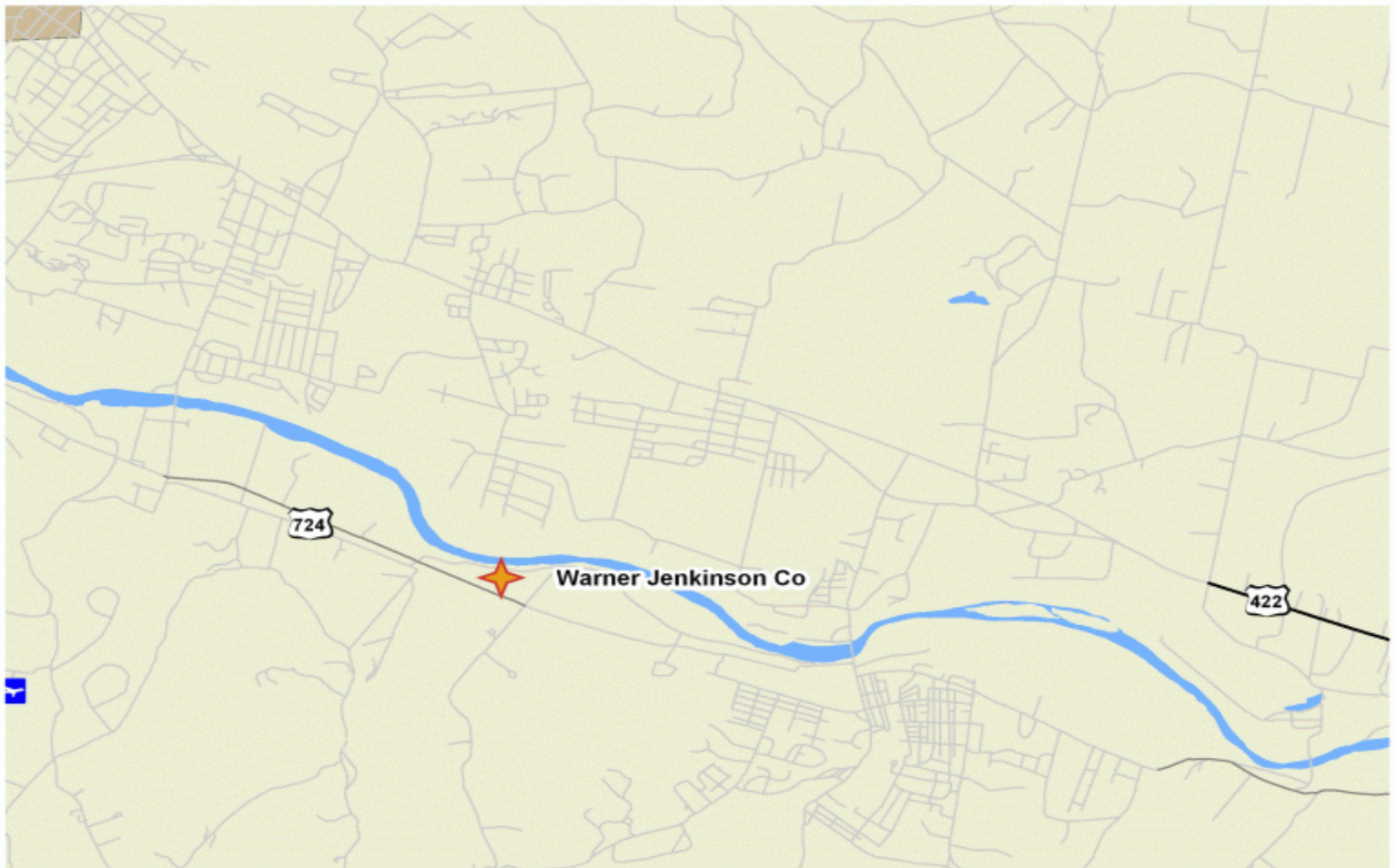
Abraham Ferdas, Director
Waste and Chemicals Management Division
EPA Region III

Attachment 1

Site location

Warner Jenkinson

Route 724, 1/4 mile off Route 724
Gibraltar, PA 19508



Legend

- | | | |
|--|---|---|
|  Warner Jenkinson |  Roads |  State Boundary |
|  Other RCRA GPRA Baseline Facility |  State Highway |  Parkland |
|  Airports |  U.S. Highway |  Water Bodies |
| |  Interstates | |
| |  County Boundary | |



Attachment 2

Site layout

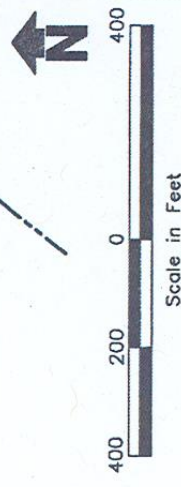
Site layout and well location

Crompton & Knowles Colors Incorporated

Gibraltar Facility

Berks County, Pennsylvania

- Legend:
- ◆ Active Production Well
 - ▣ Monitoring Well
 - Wetland Piezometer
 - ⋮ Wetland Area
 - ▨ Former Burn Pit/Sump
 - ▨ Flammable Storage



Attachment 3 GLOSSARY

Area of Concern (AOC) - An area potentially impacted by a release of hazardous waste or hazardous constituents but not a known solid waste management unit.

Government Performance and Results Act (GPRA) - EPA has established two near-term goals, termed Environmental Indicators, for the RCRA Corrective Action program under the GPRA. These goals are that by 2005, the states and EPA will verify and document that 95 percent of the 1,714 RCRA cleanup facilities will have current human exposures under control, and 70 percent of these facilities will have migration of contaminated groundwater under control.

Institutional Control (IC) - action taken to help prevent contact with hazardous constituents, such as security fencing, restrictive covenants, zoning requirements, access restrictions, etc.

Interim Measure/Remedial Action (IM) - action taken prior to a final remedy decision to help control the spread of a release of hazardous waste or hazardous constituents.

RCRA - Resource Conservation and Recovery Act, which was enacted by the United States Congress in 1976 and amended in 1984, directed EPA to develop and implement a program to protect human health and the environment from improper hazardous waste management practices. The statute is designed to control the management of hazardous waste from its generation to its disposal.

Solid Waste Management Unit (SWMU) - includes any unit used for the collection, source separation, storage, transportation, transfer, processing, treatment or disposal of solid waste, including hazardous wastes, whether such unit is associated with facilities generating such wastes or otherwise.