



UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION III

STATEMENT OF BASIS

SPS TECHNOLOGIES  
JENKINTOWN, PENNSYLVANIA  
EPA ID # PAD000000554

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

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## Section 1: Introduction

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The United States Environmental Protection Agency (EPA) has prepared this Statement of Basis (SB) to solicit public comment on its proposed decision for the SPS Technologies facility located at 301 Highland Avenue, Jenkintown, Montgomery County, Pennsylvania 19046 (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

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The Facility property consists of approximately 32 acres and is primarily surrounded by rail lines and Tacony and Tookany creeks to the south and east, commercial development to the north, and recreational and residential development to the west. Residential developments envelop the vicinity of the Facility beyond the immediate environs. A location map and Facility diagram are attached as Figures 1 and 2, respectively.

The Standard Pressed Steel Company was incorporated in 1903 and relocated to the Facility in 1920. Use of the Facility prior to 1920 is unknown, but the Facility was reportedly owned by Wharton Switch Works. In 1978, Standard Pressed Steel changed its name to SPS Technologies, Inc. Since 1920, the Facility has been used to manufacture precision metal fasteners and special machined parts, primarily for the aviation and aerospace industries.

The Facility was classified as a treatment, storage, and disposal facility (TSDF) under RCRA due to the generation and treatment/storage of electroplating solutions and sludges in a series of surface impoundments from 1950 to 1983, when the impoundments were closed. The Facility submitted a Part A application in November 1980 for the treatment of corrosives and spent electroplating baths including cadmium, chromium, silver, and cyanides. More recent notifications have included both halogenated and non-halogenated solvent wastes from parts degreasing operations.

### Section 3: Summary of Environmental History

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Based upon information in the 1986 RCRA Facility Assessment and the 1999 Environmental Indicator (EI) Inspection Report, EPA identified seven areas of concern (AOCs) at the Facility. The table below describes the AOCs as well as the post-investigation status, including confirmatory soil and groundwater sampling events performed in 2015 under EPA oversight. 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 and groundwater and covered the 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) and metals in soil, and EPA's Maximum Contaminant Level (MCL) national primary drinking water standards for VOCs and metals in groundwater.

Areas of Concern	Description	Current status
Former Surface Impoundments	Two surface impoundments were part of wastewater treatment system from 1950 to 1983, when wastewater effluent was rerouted from creek to municipal sewer system after improvements in pretreatment. Closure of impoundments was completed and certified by PADEP in 1984 in accordance with PADEP-approved closure plan.	Contaminated sludge and soil removed at closure. VOCs are below EPA's RSLs for soil; metals are within EPA's RSLs risk range for soil. VOCs and metals are below EPA's MCL drinking water standards.
Former 10,000-gallon Cutting Oil Underground Storage Tank (UST)	Investigation of oil contamination in Tookany Creek in 1980 led to discovery of leaking UST. Periodic monitoring was performed at 23 monitoring wells, several of which were also pumped in an effort to recover oil and contain spill. UST was taken out of service and removed in 1985. Cutoff trench was installed downgradient of UST along southwestern edge of Facility boundary to collect oil-impacted groundwater and route it to an oil/water separator prior to discharge via NPDES-permitted outfall. Monitoring well network decommissioned presumably in late 1980s after oil was no longer observed in any wells.	VOCs are within EPA's RSLs risk range for soil. Groundwater collection system remains in operation; effluent is monitored by state NPDES program.
Wastewater Treatment Plant (WWTP)	Began operation in 1950 and discharged treated effluent to surface impoundments until 1983, when treatment improvements allowed discharge directly to municipal sewer. Currently used to remove metals and cyanide and for pH adjustment. Acid spill in 1984 was neutralized and cleaned up within 2 hours.	VOCs and metals are below EPA's RSLs for soil.

Statement of Basis

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Hazardous Waste Storage Area	Fenced area located west of WWTP. Drums are stored on asphalt surface that is graded toward WWTP in case of leaks/releases.	No evidence of spills or releases observed or reported.
Former Temporary Drum Storage Areas	Two paved areas of drum storage adjacent to the WWTP. Some evidence of staining on pavement was observed during the 1986 assessment; however, these areas were graded toward the WWTP in case of leaks/releases. Areas have not been in use since at least 1999.	VOCs and metals are below EPA's RSLs for soil.
Storage Tanks	Used primarily for cutting, hydraulic, and fuel oils, and chemicals for the WWTP. All USTs were either closed in place or removed from facility between 1984-86 or 1994. Several ASTs remain at facility, most of which are located outside in a tank farm within secondary containment.	Petroleum hydrocarbons are below EPA's RSLs for soil. No evidence of spills or releases observed or reported from tank farm.
Sandblasting Grit Drum Area	Located along southernmost part of Facility's southwest wall. Grit from sandblasting metal parts is typically non-hazardous but occasionally contains cadmium and is therefore handled as hazardous waste.	No evidence of spills or releases observed or reported.
Overall Groundwater	Groundwater monitoring began in 1983 at five wells as required for use of surface impoundments and has continued primarily due to low levels of cadmium and trichloroethene observed in two wells until 2014.	VOCs and metals are 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 risks to human health or the environment for any use at this Facility including residential.

## Section 4: Environmental Indicators

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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 determined that the Facility met these indicators on September 28, 2000.

## Section 5: Public Participation

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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](mailto: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: 8.31.15

/John A. Armstead/

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

## **Index to Administrative Record**

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Report on Hydrogeological Investigations and Treatment of Oil-Contaminated Groundwater for SPS Technologies, The Chester Engineers, December 1981.

Surface Impoundments Closure Plan (including Addendum No.1) for SPS Technologies, Hydro-Fax Division Amchem Products, January 1983.

Draft Interim RCRA Facility Assessment Report for SPS Technologies, NUS/EBASCO, August 1986.

A Biological Investigation of Frankford Creek (aka Tacony and Tookany Creek) for SPS Technologies, William Craighead, Consulting Biologist, December 1986.

Environmental Indicator Inspection Report for SPS Technologies, US Army Corps of Engineers, July 1999.

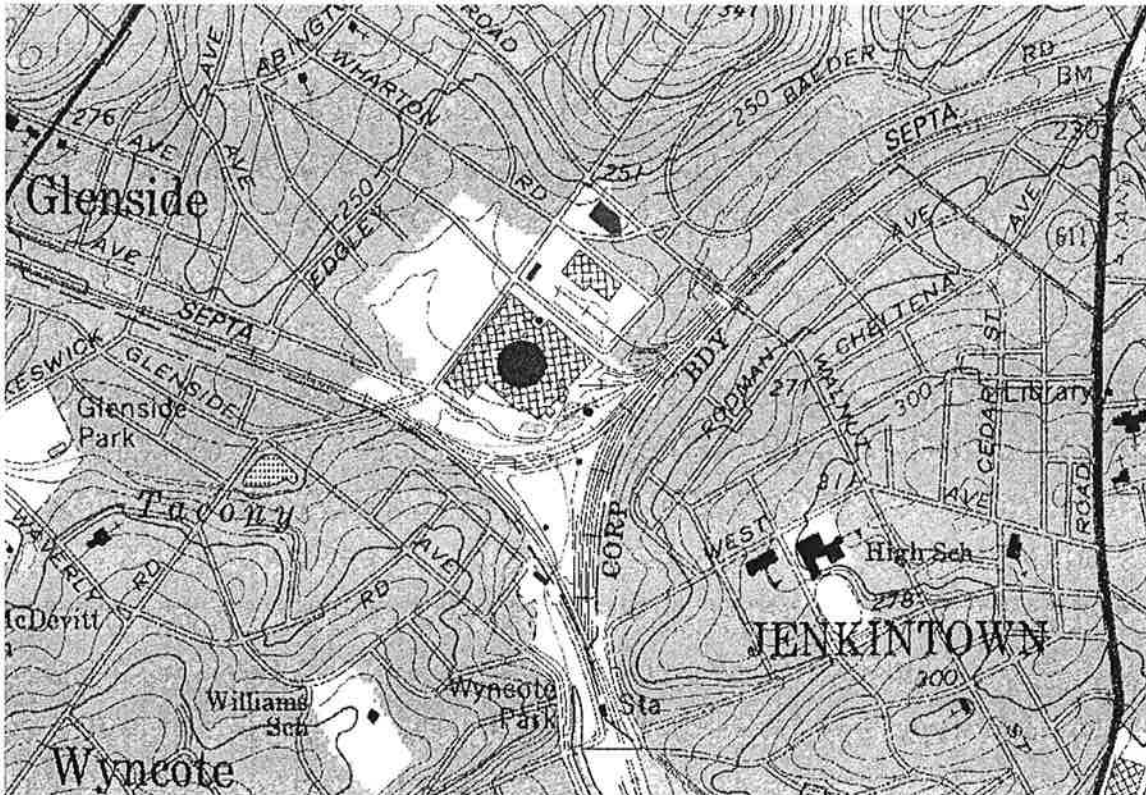
2015 Comprehensive Ground Water Monitoring Evaluation for SPS Technologies, PADEP, January 2015.

Field Investigation Report for SPS Technologies, prepared by Earth Data Northeast, August 2015.



**Figure I (Facility Location Map)**

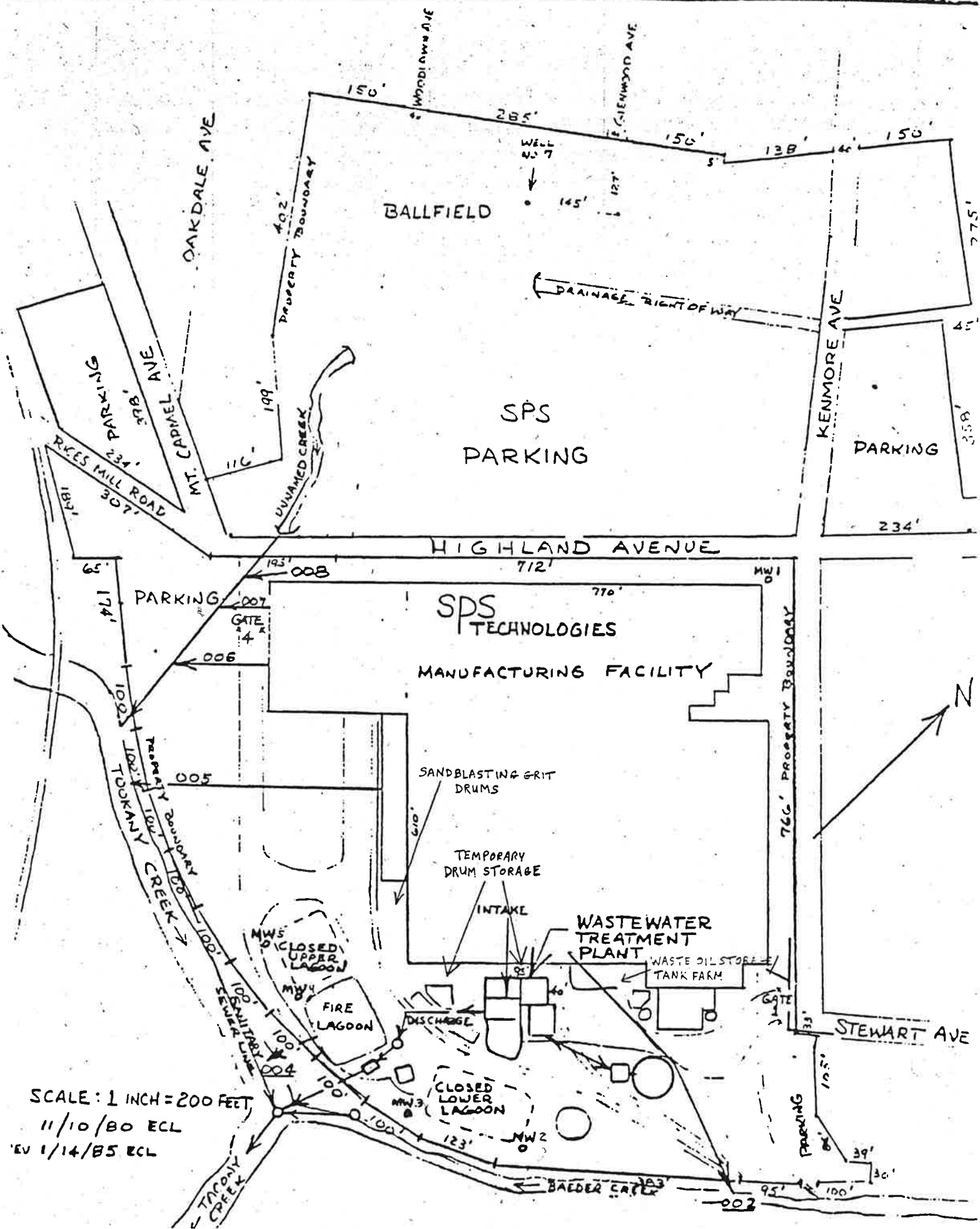
SPS Technologies  
Jenkintown Borough, Montgomery County  
(Not to scale)



Excerpted From:

U.S. Geological Survey 7.5 Minute Topographic Series, **Germantown Quadrangle**  
(Large shaded circle marks approximate location of facility)

FACILITY DRAWING (see page 4)



SCALE: 1 INCH = 200 FEET  
 11/10/80 ECL  
 EV 1/14/85 ECL