



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III

STATEMENT OF BASIS

WESTCODE, INC.
FRAZER, PENNSYLVANIA
EPA ID # PAD071451389

Prepared by
Office of Pennsylvania Remediation
Land and Chemicals Division
July 1, 2013

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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 former Westcode, Inc. facility located at 90 Great Valley Parkway within the Great Valley Corporate Center in Frazer, PA (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 properties. 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

Westcode, Inc. manufactured and assembled railroad freight car brake valves and transit car components and subassemblies from September 1979 until they vacated the Facility in June 1989. The 5.6-acre Facility is located near the northwest corner of the Great Valley Corporate Center and is bordered by other corporate center buildings. Figure 1 provides a Site Location Map. Beyond the corporate center to the north is a quarry owned by Glasgow, Inc. Beyond the corporate center to the west are residential areas and farmland. The site is located less than one mile south of the Pennsylvania Turnpike (Route 76) and less than one mile north of State Route 202.

The manufacturing process included a small electroplating operation and associated metal cleaning and preparation activities. A treatment area containing electroplating process and wastewater treatment tanks, a process chemical storage area, and a waste drum storage area were all located within the manufacturing building. Hazardous wastes reportedly generated by the Facility included spent halogenated solvents, wastewater treatment sludges, spent cyanide solution, plating bath residues, and spent stripping and cleaning bath solutions.

The process chemical storage and treatment tank areas were located in the northeastern corner of the Westcode, Inc. building. A 500-gallon below-grade spill tank, which serviced the process chemical storage area, was located outside the northeastern corner of the building. A waste drum storage area was located immediately south of the treatment area within the building. Figure 2 provides the site layout during Westcode's period of operations. All manufacturing/treatment areas were dismantled and removed from the building prior to Westcode vacating the property.

Centocor, Inc. purchased the facility in September 1989 and converted the building to a pharmaceutical manufacturing plant. In 2008, Centocor, Inc. and Ortho Biotech, Inc. merged to form Centocor Biotech, Inc. (a subsidiary of Johnson & Johnson). In 2011, Centocor Biotech, Inc. changed its name to Janssen Biotech Inc., under which it continues to operate at the Facility today. The Facility produces Remicade®, a human protein that is utilized to treat pain and inflammation. EPA visited the Facility to conduct an Environmental Indicator (EI) inspection on February 13, 2013.

Section 3: Summary of Environmental History

A 1990 Environmental Priorities Initiative Preliminary Assessment (EPI-PA) conducted by a contractor for EPA identified the waste drum storage area, the below-grade spill tank, the sludge dewatering tank, and the treatment/storage tank as potential solid waste management units (SWMUs). During Westcode's operation at the facility, no spills, discharges or dumping of any types of hazardous waste were reported.

| Areas of Concern | Description | Current status |
|-------------------------|---|---|
| Waste Drum Storage Area | A single layer of drums containing spent solvents, electroplating treatment sludges, ignitable and corrosive wastes were stored along the wall near the northeastern corner of the building. The drums were stored on the concrete floor. The building itself provided additional containment for the drums. | All drums were removed prior to Westcode vacating the property in 1989. There is no history of a release from this area. Janssen Biotech Inc. currently uses this area as a loading dock. |
| Below-grade Spill Tank | An approximately 500-gallon below-grade spill tank that serviced the process chemical storage area was located outside the northeastern corner of the building. | Although it has not been determined whether the spill tank was removed from the site, it has not been used since Westcode vacated the property. There is no history of a release from this unit. The area outside the building where the spill tank was located is not currently used for any purpose by the current owner. |
| Sludge Dewatering Tank | The sludge dewatering tank that contained electroplating-related sludges was located in the former treatment area. The treatment area was situated on a concrete floor and was surrounded by a 1-foot high concrete berm and the concrete walls of the building. | The sludge dewatering tank was removed prior to Westcode vacating the property in 1989. There is no history of a release from this tank. Janssen Biotech Inc. currently utilizes this area in their upstream pharmaceutical process. |
| Treatment/Storage Tanks | Wastewater from the process systems was segregated into alkaline and chromium waste streams. Each waste stream was directed to a 1,000 gallon treatment tank. The alkaline waste was filtered and pH-adjusted. The chromium waste was reacted with ferrous sulfate, neutralized with caustic, and flocculated. The clear supernatants from both treatment systems were discharged under permit to the public sewer authority. | All treatment/storage tanks were removed prior to Westcode vacating the property in 1989. There is no history of a release from any of these units. Janssen Biotech Inc. currently utilizes this area in their upstream pharmaceutical process. |

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Section 3: Summary of Environmental History (continued)

The Facility property is essentially capped with either structures or pavement. All of Westcode's operations occurred within the on-site building. While there are no records of spills or releases, the building itself would have provided containment to ensure that the subsurface would not be impacted.

In June 1989, Westcode ceased operations at the facility and sold their Alodine[®] process and machine shop. The facility was purchased by Centocor Property Management Corp, in September 1989. Environmental engineering firms monitored the facility closure for both Westcode and Centocor. Westcode moved to Malvern, PA, where it operated as a small quantity generator. Westcode's headquarters is currently located in West Chester, PA.

The property is currently one of eight buildings owned by Centocor and is operated by Janssen Biotech, Inc., a pharmaceutical company of Johnson & Johnson. The Facility is used by Janssen solely for the biopharmaceutical production of Remicade[®]. The current process includes 10 stainless steel bioreactors in which the proteins are made. Approximately one 55-gallon drum of hazardous waste is generated per month and includes the bioreactor cleanout liquids that consist of water, acetone and methanol.

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 the migration of contaminated groundwater under control and the current human exposures under control indicators on June 25, 2013.

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: Andrew Clibanoff
Phone: (215) 814-3391
Fax: (215) 814-3113
Email: clibanoff.andrew@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. Andrew Clibanoff. EPA will hold a public meeting to discuss this proposed decision upon request. Requests for a public meeting should be made to Mr. Andrew Clibanoff.

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. Andrew Clibanoff at the address listed above.

Date: **JUL 01 2013**



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

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Correspondence from Joseph Juckas, Quality Control Manager, Westcode, Inc., to U.S. EPA Region 3, regarding Closing Notification, January 26, 1990.

Environmental Priorities Initiative, Preliminary Assessment of Westcode, Inc., NUS Corporation, August 10, 1990.

Correspondence from Scott Barbera, Manager Quality Assurance, Westcode, Inc. to U.S. EPA Region 3, regarding Ceased Operations, March 22, 1993.

Final Environmental Indicator Inspection Report for Westcode, Inc., 90 Great Valley Parkway, Frazer, Pennsylvania 19355, prepared by Michael Baker Jr., Inc., May 2013.