UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III

STATEMENT OF BASIS

Former USG Interiors, LLC-Tate Access Floors

Red Lion, Pennsylvania

EPA ID NO. PAD000800508

Prepared by
Office of Pennsylvania Remediation
Land and Chemicals Division
March 2017

Table of Contents

List of Acronyms

AOC	Areas of Concern
AR	Administrative Record
BGS	Below Ground Surface
COC	Contaminant of Concern
EPA	Environmental Protection Agency
FDRTC	Final Decision and Response to Comments
GAC	Granular Activated Carbon
MCL	Maximum Contaminant Level
MOA	Memorandum of Agreement
MSC	Medium Specific Concentrations
NIR	Notice of Intent to Remediate
PADEP	Pennsylvania Department of Environmental Protection
PCE	Tetrachloroethylene
RCRA	Resource Conservation and Recovery Act
RI/RA	Remedial Investigation and Risk Assessment
RSL	Regional Screening Level
SB	Statement of Basis
SWMU	Solid Waste Management Unit
TCE	Trichloroethene
UST	Underground Storage Tank
VOC	Volatile Organic Compound

Section 1: Introduction

The United States Environmental Protection Agency (EPA) has prepared this Statement of Basis (SB) to solicit public comment on its proposed remedy for the former USG Interiors, LLC (USG) manufacturing facility (Facility) now owned and operated by Tate Access Floors (Tate). The facility is located at 52 Springvale Road, Red Lion, PA 17356 (hereinafter referred to as the "Facility"). Based on EPA's review of available information, EPA's proposed remedy consists of continued groundwater monitoring and associated maintenance of the groundwater monitoring system and the implementation of and compliance with groundwater use restrictions within the Facility. This SB highlights key information relied upon by EPA in proposing its remedy.

The Facility is subject to EPA's Corrective Action Program under the Solid Waste Disposal Act, as amended, commonly referred to as the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Sections 6901 et seq. The Corrective Action Program requires that owners and/or operators of facilities subject to certain provisions of RCRA investigate and address releases of hazardous waste and hazardous constituents, usually in the form of soil or groundwater contamination, that have occurred at or from their property. The Commonwealth of Pennsylvania is not authorized for the Corrective Action Program under Section 3006 of RCRA. Therefore, EPA retains primary authority in the State of Pennsylvania for the Corrective Action Program.

EPA is providing a thirty (30) day public comment period for this SB. EPA may modify its proposed remedy based on comments received during this period. EPA will announce its selection of a final remedy for the Facility in a Final Decision and Response to Comments (FDRTC) after the comment period has ended.

Information on the Corrective Action program, a fact sheet, and the Government Performance and Results Act Environmental Indicator Determinations for the Facility can be found by navigating http://www.epa.gov/reg3wcmd/correctiveaction.htm.

The Administrative Record (AR) for the Facility contains all documents, including data and quality assurance information, on which EPA's proposed remedy is based. See Section 8, Public Participation, for information on how you may review the AR.

Section 2: Facility Background

A. Facility Description and History

The Facility is located at 52 Springvale Road, in Windsor Township, York County, Pennsylvania (See Figure 1: Facility Location Map). The Facility includes approximately 15 acres situated along a hillside that slopes north from Miller Avenue to Springvale Road. Public water and sewer connections serve the Facility. The properties adjacent to the Facility are a mixture of residential, agricultural, commercial, and industrial properties.

The Facility has been in operation since the early 1940's for a variety of light industrial operations and manufacturing, i.e. metal fabrication, machine shop, and rebuilding of refrigeration compressors. USG's previous operations at the Facility used an aqueous phosphate degreasing solution for the cleaning of parts. The historical manufacturing operations at the Facility included the use of solvents and cleaning liquids, including trichloroethene (TCE), methylene chloride, and phosphates. The effluent from the operations was neutralized with sulfuric acid and lime prior to being discharged to four Facility lagoons. The use of the lagoons was discontinued in 1975 and their closure was approved by Pennsylvania Department of Environmental Resources in 1986.

Currently, Tate manufactures panels for flooring systems, which facilitate access for sub-floor electrical and utility services, particularly for applications involving computer equipment. The manufacturing of flooring systems began at the Facility in 1973. Tate's manufacturing operations at the Facility include metal stamping and forming, welding, cleaning, and finishing. Panels are finished with paint or adhesives, such as vinyl tile or carpet.

B. Geology and Hydrogeology

The Facility is situated within the structurally complex Upland Section of the Piedmont Physiographic Province. The Facility is on the northern edge of the Tucquan Antiform. Bedrock in the area has been mapped as the Lower Paleozoic Marburg Schist, which mainly consists of bluish-gray to silvery green, fine-grained, schist containing muscovite, chlorite, albite, and/or quartz.

The principal surface drainage feature for the area is Pine Run, which is located approximately 1,500 feet northeast of the Facility. Pine Run flows toward the south. Pine Run discharges to the North Branch of Muddy Creek, which in turn discharges to the Susquehanna River.

Groundwater in the Marburg Schist and Wissahickon Formation is used for local domestic purposes. Groundwater flow is to the northeast, mimicking the surface

topography, towards residential properties. The depth to groundwater beneath the Facility ranges from 13 feet (upgradient) to 60 feet (downgradient) below ground surface (bgs).

Section 3: Summary of Environmental History and Investigations

On September 12, 2003, USG submitted a Notice of Intent to Remediate (NIR) enrolling the Facility in the Pennsylvania Department of Environmental Protection's (PADEP) Land Recycling and Environmental Remediation Standards Act (Act 2), 35 P.S. Sections 6026.101 *et seq*., Program. On November 11, 2012, USG entered the One Cleanup Program under which EPA and PADEP, pursuant to an April 2004 Memorandum of Agreement, agreed how the Agencies planned to would coordinate certain cleanups under Act 2 and RCRA Corrective Action.

On July 26, 2009, USG submitted a Remedial Investigation and Risk Assessment (RI/RA) Report to PADEP. The RI/RA Report was voluntarily withdrawn on October 9, 2009 to collect additional data and to provide additional results. On November 13, 2012 USG submitted a second RI/RA Report (2012 RI/RA Report) to PADEP. USG completed the additional sampling and submitted a revision to the 2012 RI/RA Report in June 2016 (Revised RI/RA Report). EPA approved the Revised RI/RA Report on August 11, 2016. The Revised RI/RA Report is included in the Administrative Record.

A. Remedial Investigation/Risk Assessment

The Revised RI/RA Report summarized the investigation and remedial actions taken at the Facility.

1. Soil Assessment

Between August 1997 and April 1999, USG collected 36 soil samples from a total of 47 borings at interior and exterior locations and one trench at the Facility. The soil samples were analyzed for various parameters including volatile organic compounds (VOCs) and Total Organic Carbon. The sampling confirmed the presence of certain VOCs, specifically trichloroethlyene, toluene, totally xylenes, ethylbenzene, 1,2,4-trimethyl-benzene, n-butyl-benzene, 4-isopropyl-toluene, 1,3,5-trimethyl-benzene, naphthalene, benzene, and n-propylbenzene in Facility soils. Results showed that all of the VOCs detected in Facility soils were below PADEP and EPA screening levels for residential soils. In March 2016, 10 additional soil samples were collected from five borings to confirm the previous soil results. Although low levels of VOCs were detected in 18 of the 46 samples, none of the soil samples collected at the Facility were above the Act 2 Statewide Health Standard Medium Specific Concentrations (MSCs); Region III Screening Levels (RSLs) for residential soil or soil-to-groundwater screening levels.

2. *Groundwater Assessment*

a. Onsite

A groundwater assessment was performed as part of the Revised RI/RA between November 2007 and January 16, 2016. The assessment included the installation of 12 monitoring wells and 17 rounds of groundwater sampling. Groundwater samples were analyzed for VOCs, total petroleum hydrocarbons (TPH), total and free cyanide and total dissolved metals. The primary constituent of concern in Facility groundwater is TCE. The National Primary Drinking Water Standard Maximum Contaminant Level (MCL) promulgated pursuant to Section 42 U.S.C. §§ 300f et seq. of the Safe Drinking Water Act and codified at 40 CFR Part 141 for TCE is 5 micrograms per liter (ug/l).

In addition to the monitoring wells located on the Facility property, a sump also exists at the Facility and is located in the basement of the single large manufacturing building along the southern portion of the Facility property. Samples were collected from the sump during the July 2010 and August 2010 sampling events. No VOCs were detected in the sample results.

EPA has analyzed 10 years of groundwater monitoring results and has determined that TCE concentrations in Facility groundwater, except within the vicinity of MW-4, have attenuated to concentrations below 5 ug/l. The January 2016 sampling confirms that TCE levels, except in well MW-4, remain below the applicable MCL. TCE concentrations in MW-4 have been reduced through attenuation from 55 ug/l to 10 ug/l. EPA has determined that TCE concentrations in groundwater around MW-4 should fall below 5 ug/l within 7 years.

Well ID	Sample Date	TCE	Well ID	Sample Date	TCE
MW-1	11/14/2007	<5	MW-6	11/15/2007	<5
	7/14/2010	<5		7/14/2010	<5
	8/17/2010	<5		8/17/2010	<5
	1/16/2016	<1		1/20/2016	<1
MW-2	11/15/2007	<5	MW-7	11/15/2007	5
	7/14/2010	<5		7/14/2010	2 J
	8/18/2010	<5		8/18/2010	2 J
MW-3	7/14/2010	<5	MW-8	11/14/2007	<5
	8/18/2016	<5		7/14/2010	<5
	1/21/2016	0.7 J		8/18/2010	<5
MW-4	11/15/2007	55		1/20/2016	<1
	7/14/2010	46	MW-9	11/15/2007	<5
	8/17/2010	41		7/14/2010	<5
	1/21/2016	10		1/20/2016	<1
MW-4D	11/15/2007	180	MW-10	11/15/2007	<5
	7/14/2010	<5		7/14/2010	1 J
	8/17/2010	<5		8/18/2010	<5
	1/21/2016	<1		1/20/2016	<1
MW-5	11/14/2007	<5	MW-11	11/15/2007	<5
	7/14/2010	<5		7/14/2010	3 J
	8/17/2010	<5		8/17/2010	2 J
	1/20/2016	<1		3/7/2016	1

Notes:

(1) All values are reported in micrograms per liter (µg/L)

(2) J indicates parameter was detected below Laboratory Reporting Limit or Limit of Quantitation but above the Method Detection Limit; value report is estimated.

b. Offsite

From 1997 to 1999, USG collected water well and spring samples from 17 residential properties downgradient of the Facility. The analyses of the samples detected TCE in samples from four residential wells, Res-1, Res-2, Res-3, and Res-4, respectively. Following the detection of VOCs in these water sources, granular activated carbon (GAC) filtration treatment systems were installed at each impacted residence.

Additional private water well sampling events occurred quarterly until 2010. A total of 16 residential water wells, two unused private water wells, and two spring outfalls were sampled as part of the sampling program.

In 2001, an unused church well was included in the sampling of private wells. TCE was detected in this well at a concentration of 8.1 µg/L.

No additional private water sources detected any VOCs and VOCs have not been detected in residential water supplies located beyond Pine Run.

Since 2001, sampling was conducted on a quarterly basis at three residences fitted with GAC treatment systems, and the church well. A fourth residence was sampled annually.

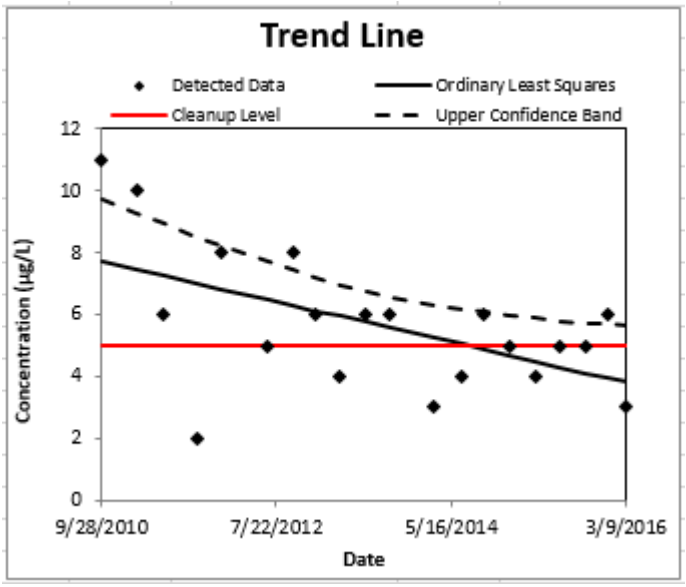
Results from the most recent sampling event in March 2016 show no TCE concentrations in residential wells above that contaminant's MCL of 5 ug/L. The last exceedance of the MCL was in a well Res-1 sample taken in in December 2015 with a concentration of TCE of 6 µg/L.

The full results of the off-Facility sampling program demonstrate that the TCE groundwater plume that once extended from the Facility to the northeast in the direction of Pine Run has attenuated below MCL offsite and has retreated to a small area around on-site well MW-4. The current TCE plume (shown in map on Figure 2)is confined within the Tate property boundary and no longer extends to any of the residential wells.

PADEP has overseen the offsite groundwater program since the TCE was first discovered in 1997. In 2016, PADEP began review and approval of "attainment demonstrations" for the off-site wells in the program. Attainment demonstrations are the way in which PADEP (or EPA) determines that groundwater consistently meets the MCL and is expected to continue to meet the MCL without further action.

PADEP has approved four attainment demonstrations to date and has terminated the monitoring requirement for these wells. The final attainment demonstration is now under review. EPA agrees that the off-site wells no longer contain TCE greater than 5ug/l and are therefore suitable for drinking purposes without treatment. In this SB, EPA is not proposing any further action with regard to the off-site groundwater program. EPA understands that residents may continue to use and maintain the GAC filters if they choose, but the systems will no longer be maintained by Tate.
Actual results and an example of the statistical demonstration of attainment are provided below.

Graph 1: Trend Line of Resident 1



Graph 1 shows the decreasing trend of TCE concentrations in Resident Well 1.

Well ID	Sample Date	TCE	Well ID	Sample Date	TCE
Resident 1	3/26/2007	8.59	Resident 3	3/26/2007	1.02
	9/28/2007	16.2		6/29/2007	ND
	12/27/2007	11.6		9/28/2007	3.13
	3/31/2008	11.1		12/27/2007	2.24
	6/30/2008	11.1		3/31/2008	1
	9/29/2008	12.5		6/30/2008	0.94
	12/30/2008	8.45		9/29/2008	1.68
	3/30/2009	10.3		12/30/2008	0.67
	6/24/2009	12.9		3/30/2009	1.77
	9/14/2009	9.29		6/24/2009	ND
	12/15/2009	7.16		9/14/2009	1.55
	9/28/2010	11		12/15/2009	<0.5
	2/8/2011	10		9/28/2010	2 J
	5/24/2011	6		2/8/2011	2 J
	9/26/2011	2 J		5/24/2011	< 5
	12/23/2011	8		9/26/2011	< 5
	6/20/2012	5J		12/23/2011	< 5
	9/21/2012	8		6/20/2012	< 5
	12/17/2012	6		9/21/2012	1 J

	3/21/2013	4J		12/17/2012	< 5
	6/27/2013	6		3/21/2013	< 5
	9/26/2013	6		6/27/2013	< 5
	3/13/2014	3J		9/26/2013	< 5
	6/26/2014	4		12/23/2013	< 5
	9/17/2014	6		3/13/2014	< 5
	12/23/2014	5		6/26/2014	< 0.5
	3/31/2015	4		9/17/2014	0.6 J
	6/30/2015	5		12/23/2014	<0.5
	10/6/2015	5		3/31/2015	<0.5
	12/30/2015	6		6/30/2015	0.7 J
	3/9/2016	3		10/6/2015	0.8 J
Resident 2	3/26/2007	5.18		12/30/2015	0.7 J
	6/29/2007	6.91	Resident 4	6/29/2007	ND
	9/28/2007	7.84		9/28/2007	ND
	12/27/2007	6.15		9/29/2008	ND
	3/31/2008	5.11		12/15/2009	<0.5
	6/30/2008	5.68		9/28/2010	< 5
	9/29/2008	5.8		5/24/2011	< 5
	12/30/2008	4.31		6/20/2012	< 5
	3/30/2009	6.8		6/27/2013	< 5
	6/29/2009	5.47		9/17/2014	<0.5
	9/14/2009	5.05		10/6/2015	<0.5
	12/15/2009	3.06	Resident 5	9/28/2010	2 J
	9/28/2010	5		6/26/2014	<0.5
	2/8/2011	4 J		9/17/2014	2
	5/24/2011	3 J		12/23/2014	2
	9/26/2011	3 J		3/31/2015	1
	12/23/2011	3 J		6/30/2015	1
	6/20/2012	3 J		10/6/2015	0.6 J
	9/21/2012	4 J		12/30/2015	1
	12/17/2012	3 J		3/9/2016	0.6 J
	3/21/2013	2 J			
	6/27/2013	3 J			
	9/26/2013	3 J			
	12/23/2013	2 J			
	3/13/2014	2 J			
	6/26/2014	2			
	9/17/2014	3			

	12/23/2014	2			
	3/31/2015	2			
	6/30/2015	2			
	10/6/2015	2			
	12/30/2015	2			
	3/9/2016	1			

Notes:

(1) All values are reported in micrograms per liter (µg/L)
(2) J indicates parameter was detected below Laboratory Reporting Limit or Limit of Quantitation but above the Method Detection Limit; value report is estimated.

3. Surface Water

Pine Run is located approximately 1,500 feet down gradient (northeast) of the Facility. Surface water samples were collected along Pine Run in an attempt to determine the influence of groundwater from the TCE plume on the quality of the surface water in the area. Sampling events were conducted between 1997 and 1999 and in 2010. No VOCs were detected in any of the samples collected from Pine Run. EPA has, therefore, determined that the TCE plume detected in the groundwater along the southern extent of Pine Run does not extend to Pine Run, rather it attenuates before Pine Run.

4. Ecological Risk Assessment

An ecological screen was completed to determine if surface soils or sediments at the Facility have the potential to pose substantial ecological impact(s) requiring further evaluation. No potentially complete ecological exposure pathways were identified. A search was also conducted for critical habitats for threatened and endangered species and wetlands at the Facility and in the surrounding area. The search did not identify critical habitats on or near the Facility and did not identify any wetlands on the Facility. Based on this screening, no potentially complete exposure pathways are present for ecological receptors, and no evidence of ecological impacts exist.

B. EPA Assessment

The investigations discussed in the previous sections of this SB were completed under PADEP oversight pursuant to PADEP's Act 2 Program. Soil and groundwater sampling results obtained during those investigations were compared to Act 2 residential MSCs. Act 2 residential MSCs are equivalent to Region III Screening Levels (RSLs) for residential soil for the individual soil COCs at the Facility. For groundwater, the Act 2 residential MSCs are equivalent to EPA's Maximum Contaminant Levels (MCLs) for groundwater for each of the individual contaminants of concern at the Facility.

Chlorinated and/or petroleum-related VOCs were detected in a number of soil samples collected at the Facility. However, none were detected above their respective direct contact or soil-to-groundwater, used aquifer, residential MSCs, nor were any seen above the PADEP residential volatilization to indoor air soil screening values. A substantial number of soil samples were taken, and no source of contaminated soil beneath or within 100 feet of the Facility has been identified. The available soil data has indicated that migration of vapors from Facility soils to the indoor air of both on-Facility and off-Facility buildings is not a significant pathway.

EPA has reviewed the monitoring results from the groundwater sampling program and concludes that the contaminants are effectively being addressed by natural attenuation. Specifically, the extent of contamination in groundwater is not increasing and concentrations of contaminants are declining over time. The proposed remedy for groundwater consists of monitored natural attenuation until drinking water standards are met on site and to ensure contamination off site remains below MCL. Compliance with and maintenance of groundwater use restrictions at the Facility is to prevent exposure to TCE while levels remain above drinking water standards on site.

Section 4: Corrective Action Objectives

EPA's Corrective Action Objectives for the specific environmental media at the Facility are the following:

1. Soils

   EPA's Corrective Action Objective for Facility soils is to meet Pennsylvania's Act 2 Statewide Health Standard Medium Specific Concentrations (MSCs) for Soils. EPA has determined that the MSCs for soils are protective of human health and the environment for the contaminants at the Facility.

2. Groundwater

   EPA expects final remedies to return usable groundwater to its maximum beneficial use within a timeframe that is reasonable given the particular circumstances of the project. For projects where aquifers are either currently used for water supply or have the potential to be used for water supply, EPA will use MCLs. Therefore, the Corrective Action objective for the groundwater is to attain 5 µg/l, the MCL for TCE, throughout the existing plume.

Section 5: Proposed Remedy

1. Soils

EPA has made a Corrective Action Complete without Controls determination for Facility soils because based on EPA's review of sampling data, there are currently no unacceptable risks to human health and the environment from Facility soils. Soil sampling results show contaminants in Facility soils are consistently below the applicable MSCs for residential use (direct contact). Thus, no further corrective action is needed.

2. Groundwater

EPA's proposed remedy for Facility groundwater consists of monitored natural attenuation until drinking water standards are met within the property boundary; compliance with and maintenance of groundwater use restrictions at the Facility to prevent exposure to contaminants while levels remain above drinking water standards, known as MCLs, and compliance with the EPA and PADEP approved Post Remedial Care Plan.

EPA is also proposing to require a coordinate survey, as well as a metes and bounds survey, of the boundaries of the groundwater use restrictions, and Facility boundaries as follows:

1. The boundary of each use restriction shall be defined as a polygon; and

2. The longitude and latitude of each polygon vertex shall be established as follows:

    a. Decimal degrees format;
    b. At least seven decimal places;
    c. Negative sign for west longitude; and
    d. World Geodetic System (WGS) 1984 datum.

B. Implementation

EPA proposes that the final remedy for the Facility be implemented through an enforceable mechanism such as an order and/or an Environmental Covenant. If an Environmental Covenant is to be the enforceable mechanism, it will be recorded in the chain of title for the Facility property pursuant to the Pennsylvania Uniform Environmental Covenants Act, Act 68 of the Code of Pennsylvania (Environmental Covenant) and will be recorded with the County Deed Office. A clerk-stamped copy of the Environmental Covenant will be sent to EPA and PADEP within sixty (60) calendar days of recordation.

Section 6: Evaluation of Proposed Remedy

This section provides a description of the criteria EPA used to evaluate the proposed remedy consistent with EPA guidance. The criteria are applied in two phases. In the first phase, EPA evaluates three decision threshold criteria as general goals. In the second phase, for those remedies which meet the threshold criteria, EPA then evaluates seven balancing criteria.

Threshold Criteria	Evaluation
1) Protect human health and the environment	EPA's proposed remedy will protect human health and the environment by controlling potential unacceptable risks to TCE exposure. Based on the Remedial Investigation/Risk Assessment which evaluated all exposures to human health, EPA has determined that TCE concentrations in Facility groundwater, except within the vicinity of MW-4, have attenuated below 5 ug/l. Moreover, EPA has determined that TCE in the vicinity of MW-4 is effectively being addressed by natural attenuation. Therefore, EPA's proposed remedy for the Facility requires groundwater use restrictions at the Facility to minimize the potential for human exposure to contamination until the MCL for TCE is achieved in the vicinity of MW-4. EPA will also require continued monitoring and treatment of off-site wells in accordance with the approved Post Remedial Care Plan.
2) Achieve media cleanup objectives	EPA's proposed remedy is expected to achieve the MCL of 5 µg/L for TCE throughout the plume.
3) Remediating the Source of Releases	In all proposed remedies, EPA seeks to eliminate or reduce further releases of hazardous wastes and hazardous constituents that may pose a threat to human health and the environment. No source area of TCE was identified at the Facility. Past excavation related to construction and building construction activities are believed to have eliminated the source of contamination. EPA has determined that there is no current source of TCE. That determination s supported by groundwater monitoring results.

Balancing Criteria	Evaluation
4) Long-term effectiveness	The long term effectiveness of the remedy will be maintained by the implementation of groundwater use restrictions and compliance with the approved Post Remedial Care Plan.
5) Reduction of toxicity, mobility, or volume of the Hazardous Constituents	The reduction of mobility and volume of hazardous constituents has already been achieved as demonstrated by soil sampling and groundwater monitoring. TCE levels have attenuated over time as shown in Figure 2.
6) Short-term effectiveness	EPA's proposed remedy does not involve any activities, such as construction or excavation, that would pose short-term risks to workers, residents, and the environment.
7) Implementability	EPA anticipates that the groundwater use restrictions and groundwater monitoring and treatment requirements in the EPA and PADEP-approved Post Remedial Care Plan will be implemented through an enforceable Environmental Covenant.
8) Cost	The costs associated with this proposed remedy are associated with the development and recording of the environmental covenant and continued sampling and maintenance of the GAC treatment systems on off-site wells. EPA and PADEP will determine if financial assurance is needed during the review of the Post Remedial Care Plan.
9) Community Acceptance	EPA will evaluate community acceptance of the proposed remedy during the public comment period and will be described in the Final Decision and Response to Comments (FDRTC).
10) State/Support Agency Acceptance	PADEP was the lead agency for the remediation at the Facility, with EPA input under the One Cleanup Program. PADEP and EPA have jointly reviewed and approved the Remedial Investigation/Risk Assessment Reports. EPA, therefore, expects State acceptance of the proposed remedy.

Section 7: Financial Assurance

EPA and PADEP will determine if Financial Assurance is needed based on the cost estimate to be submitted with the Post Remedial Care Plan. EPA anticipates that the Post Remedial Care Plan will be submitted for EPA and PADEP review and approval within 90 days of the FDRTC.

Section 8: Public Participation

Interested persons are invited to comment on EPA's proposed remedy. The public comment period will last 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 Ms. Catheryn Blankenbiller at the address listed below.

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

The Administrative Record contains all the information considered by EPA for the proposed remedy at the Facility. The Administrative Record is available at the following location:

U.S. EPA Region III
1650 Arch Street
Philadelphia, PA 19103
Contact: Catheryn Blankenbiller (3LC30)
Phone: (215) 814-3464
Fax: (215) 814-3163
Email: Blankenbiller.Catheryn@epa.gov

Section 9: Signature

Date: _____ _____

Catherine A. Libertz, Acting, Director
Land and Chemicals Division
US EPA, Region III

Section 10: Index to Administrative Record

Environmental Indicator Inspection Report Prepared by Baker for EPA in January 2011

Memo to File Prepared by EPA in June 2011

Pennsylvania One Cleanup Program Letter Prepared by EPA and PADEP in November 2012

Remedial Investigation and Risk Assessment Report Prepared by AMEC Environment and Infrastructure Inc. for USG Interiors, LLC in November 2012

Remedial Investigation and Risk Assessment Report Prepared by Amec Foster Wheeler Environment and Infrastructure Inc. for USG Interiors, LLC in June 2016

Section 11: Figures

Figure 1- Facility Location Map
Figure 2 – TCE Plume (both historic and current estimates)

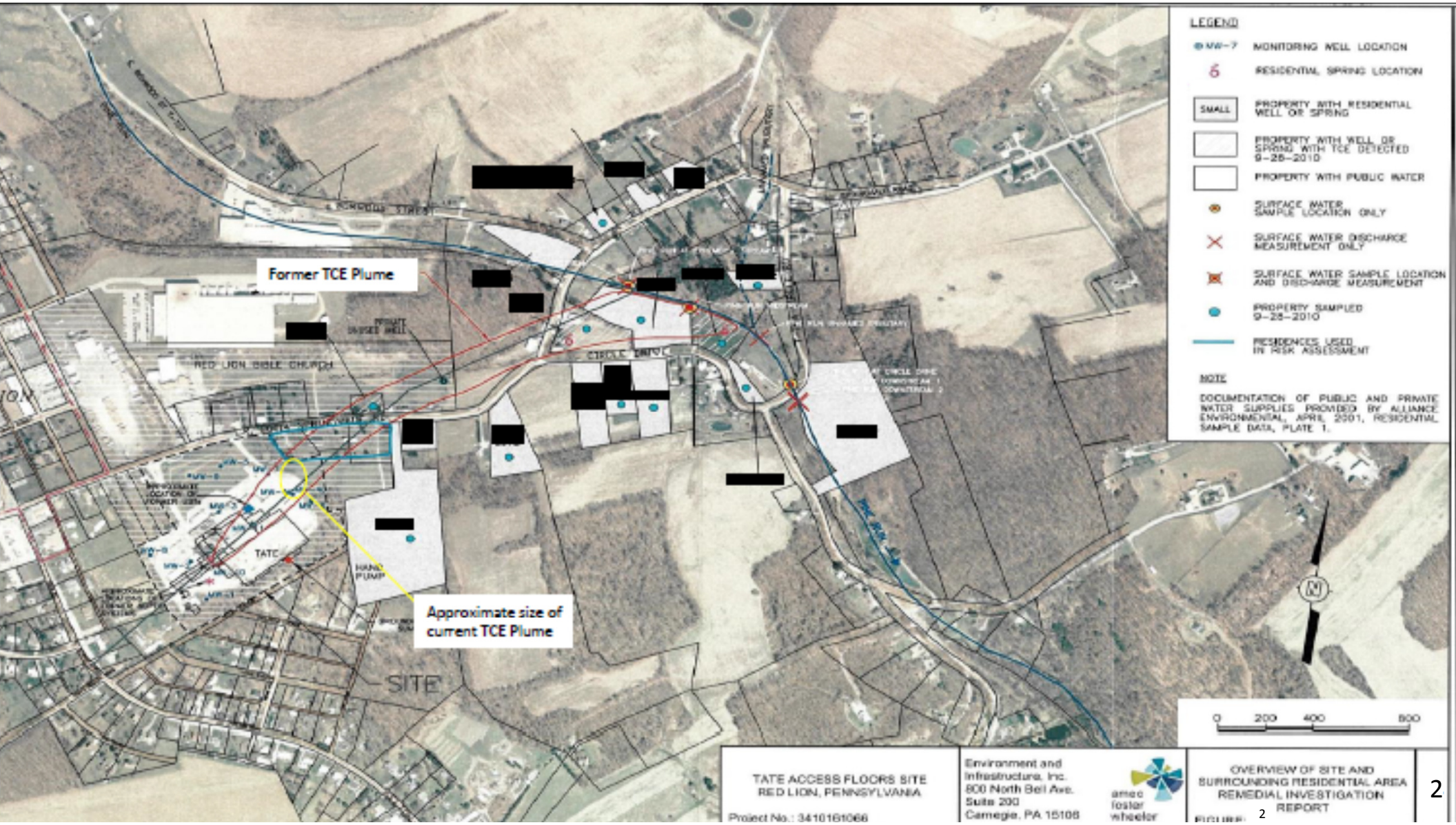
Source: Google maps

LAT=39°53'20.25"N
LON=76°35'32.83"W

SCALE: 1"=400'	DATE: NOV. 2010
S.O. NO.: 118043	FILE: 118043-TAT-01
DSN/DWN: JBM/WJH	CHK: SRF

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

Figure 1: Facility Location Map
Tate Access Floors, Inc.
52 Springvale Road
Red Lion, Pennsylvania 17356


Former TCE Plume
Approximate size of current TCE Plume
SITE
RED LION BIBLE CHURCH
TATE
LEGEND
MW-7 MONITORING WELL LOCATION
6 RESIDENTIAL SPRING LOCATION
SMALL PROPERTY WITH RESIDENTIAL WELL OR SPRING
PROPERTY WITH WELL OR SPRING WITH TCE DETECTED 9-28-2010
PROPERTY WITH PUBLIC WATER
SURFACE WATER SAMPLE LOCATION ONLY
SURFACE WATER DISCHARGE MEASUREMENT ONLY
SURFACE WATER SAMPLE LOCATION AND DISCHARGE MEASUREMENT
PROPERTY SAMPLED 9-28-2010
RESIDENCES USED IN RISK ASSESSMENT
NOTE
DOCUMENTATION OF PUBLIC AND PRIVATE WATER SUPPLIES PROVIDED BY ALLIANCE ENVIRONMENTAL, APRIL 2001, RESIDENTIAL SAMPLE DATA, PLATE 1.
0 200 400 800
TATE ACCESS FLOORS SITE
RED LION, PENNSYLVANIA
Project No.: 3410161066
Environment and Infrastructure, Inc.
800 North Bell Ave.
Suite 200
Carnegie, PA 15106
amec foster wheeler
OVERVIEW OF SITE AND SURROUNDING RESIDENTIAL AREA
REMEDIAL INVESTIGATION REPORT
2