UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III

STATEMENT OF BASIS

FORMER ELTRA CORPORATION
4700 NORTH 5th STREET HIGHWAY

TEMPLE, PENNSYLVANIA

EPA ID NO. PAD069785632

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

Table of Contents

List of Acronyms

AOC	Areas of Concern
AR	Administrative Record
AST	Above Ground Storage Tank
COI	Contaminants of Interest
EPA	Environmental Protection Agency
FDRTC	Final Decision Response to Comments
GPRA	Government Performance and Results Act
MCL	Maximum Contaminant Level
RAO	Remedial Action Objective
RCRA	Resource Conservation and Recovery Act
RSL	Regional Screening Level
SB	Statement of Basis
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 Eltra Corporation (Eltra) Plant located in Temple, Pennsylvania (hereinafter referred to as the Facility or Site). In March 2016, the Pennsylvania Department of Environmental Protection (PADEP) approved a Final Report for this property through its Land Recycling Program.

EPA's proposed remedy for the Facility consists of compliance with and maintenance of land and ground water uses restrictions that have been implemented under the PADEP program. PADEP's action is consistent with EPA's corrective action objectives for this facility and EPA is proposing that no further Agency action is needed. This SB highlights key information relied upon by EPA in proposing its remedy for the Facility.

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. §§ 6901 et seq. The Corrective Action program requires that 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. 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 on 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 (Final Decision) after the public comment period has ended.

Information on the Corrective Action program as well as a fact sheet for the Facility can be found by navigating https://www.epa.gov/hwcorrectiveactionsites/corrective-action-programs-around-nation. 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, below, for information on how you may review the AR.

Section 2: Facility Background

The Facility is located at 4700 North 5th Street Highway in Temple, Muhlenberg Township, Berks County, Pennsylvania, and occupies approximately 3.8 acres. The site has been used since about 1920s as an auto body machine shop and since the 1950s for lead acid battery manufacturing and storage until the facility was closed around 1985. The site is currently used as a warehouse facility.

The Facility is located in a mixed commercial and industrial area. The Facility is bordered to the east by Allentown Pike (5th St. Highway) and undeveloped land, to the south by undeveloped land and commercial-type buildings properties, to the west by railroad grade and NGK Metals Plant property located farther to the northwest, and to the north by commercial properties. A Site location map is provided in Figure 1 (Attachment #1), A Site Layout Map is provided in Figure 2 (Attachment #2), and an Aerial Photograph of the Site is provided in Figure 3 (Attachment #3).

On August 18, 1980, the owner of the Facility submitted a Notification of Hazardous Waste Activity to the EPA. On November 14, 1980, the facility also submitted a Part A Hazardous Waste Permit Application to EPA for its generation and treatment/storage/disposal of hazardous wastes D001, D002, D008, F001, and F003. On July 21, 1981, the facility was assigned its EPA ID Number and was granted interim status.

In January 2016, the facility submitted the Act 2 Final Report to PADEP. On March 4, 2016, PADEP approved the report for attainment of Non-Residential Statewide Health Standard for lead in soils. An environmental covenant to restrict property uses was subsequently executed in May 2016 and was recorded in the Recorder of Deeds Office in Berks County, Pennsylvania on June 13, 2016.

Section 3: Summary of Environmental Investigations and Remediation

For all environmental investigations conducted at the Facility, groundwater concentrations were screened against federal Maximum Contaminant Levels (MCLs) promulgated pursuant to Section 42 U.S.C. §§ 300f et seq. of the Safe Drinking Water Act and codified at 40 CFR Part 141, or if there was no MCL, EPA Region III Screening Levels (RSL) for tap water for chemicals. Soil concentrations were screened against EPA RSLs for residential soil and industrial soil. EPA also has RSLs to protect groundwater and soil concentrations were also screened against these RSLs.

The main focus of the remedial investigation was the identified waste management areas and areas of concern (AOCs). On August 8, 2002, EPA performed an Environmental Indicator Inspection at the facility. The solid waste management units (SWMUs) and Areas of Concern identified during the inspection included Wastewater Treatment Plant, Baghouse Areas, Wet Scrubber, Drum storage area, Container storage area, Fuel Tanks, Flammable storage area, loading and unloading areas, oil storage area, hazardous waste storage area and lead contaminated soil areas. Except the lead contaminated soil areas, no releases associated with the remaining SWMUs and AOCs were documented.

3.1 Soils

The release of lead was discovered during the sale of the property in 1990. The potential buyer performed soil sampling as part of its due diligence and uncovered the existence of lead

contaminated soil in four areas (A, B, C and D) of the site. In May, 1990, lead contaminated soils in these areas were excavated. Approximately 235 cubic yards of lead contaminated soils were excavated and disposed of at the Michigan Disposal, Inc. in Bellville, Michigan. In September 2015, the facility owner performed post-excavation sampling at these areas. The post-excavation sampling results demonstrate the PADEP non-residential statewide health standard of 450 mg/kg for lead has been met at the A, B, C, and D areas.

In October 2015, the facility conducted soil removal in the wastewater treatment plan area (Area E). Approximately 9.3 cubic yards were excavated and disposed of at the Conestoga Landfill in Morgantown, Pennsylvania. The post-excavation sampling results demonstrate the PADEP non-residential statewide health standard of 450 mg/kg for lead has been met at Area E. The 450 mg/l is Pennsylvania's standard to protect against lead leaching from soil to groundwater.

All A, B, C, D, and E areas meet the EPA's non-residential direct contact screening level (SL) of 800 mg/kg.

3.2 Groundwater

A groundwater sample was collected at the facility on 8/7/2014 at the depth of 27.7 feet boring. Lead was detected in shallow aquifer groundwater at concentration of 27 micrograms per liter (ug/l), slightly above the MCL of 15 ug/l. Given the volume of soil removal, EPA expects groundwater concentrations of lead will continue to decline due to natural attenuation. There are no private drinking water wells located within a 1.5 miles radius of the facility. EPA concurs that the current groundwater use restrictions are the sole remedial measure for groundwater.

3.3 Environmental Indicators

Under the Government Performance and Results Act ("GPRA"), EPA has set national goals to address RCRA corrective action facilities. Under GPRA, EPA evaluates two key environmental clean-up indicators for each facility: (1) Current Human Exposures Under Control, and (2) Migration of Contaminated Groundwater Under Control. The Facility met both of these indicators on January 30, 2004.

Section 4: Corrective Action Objectives

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

1. Soils

EPA's corrective action objective for soils is to attain the EPA's non-residential direct

contact SL of 800 mg/kg for lead.

2. Groundwater

EPA expects final remedies to return 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 the National Primary Drinking Water Standard Maximum Contaminant Levels (MCLs) promulgated pursuant to Section 42 U.S.C. §§ 300f et seq. of the Safe Drinking Water Act and codified at 40 C.F.R. Part 141.

EPA's corrective action objectives for groundwater is to meet the MCL of 15 ug/l for lead. Until such time as the MCL is met throughout the Facility, exposures will be controlled by requiring groundwater use restrictions at the Facility.

Section 5: Proposed Remedy

1. Introduction

Under this proposed remedy, some contaminants remain in the soil and groundwater at the Facility above levels appropriate for residential uses. Because some contaminants remain in the soil and groundwater at the Facility at levels which exceed residential use, EPA's proposed remedy requires the compliance with and maintenance of soil and groundwater use restrictions. EPA proposes to implement the land and groundwater restrictions necessary to prevent human exposure to contaminants at the Facility through an enforceable mechanism such as a permit, order, or environmental covenant.

2. Soils

For Facility's soils, the proposed remedy consists of compliance with and maintenance of land use restrictions to limit use of the property for non-residential purpose only.

3. Groundwater

EPA's proposed remedy for groundwater at the Facility is monitored natural attenuation with the implementation and maintenance of groundwater use restrictions for as long as lead concentrations in the groundwater measured above 15 ug/l. EPA is proposing that the following activities and groundwater use restrictions be implemented at the Facility:

a. Groundwater at the Facility shall not be used for any purpose other than the operation, maintenance, and monitoring activities currently being conducted by the Facility and required by EPA, unless it is demonstrated to EPA that such use will not pose a threat to human health or the environment or adversely affect or interfere with

the final remedy and the Facility obtains prior written approval from EPA for such use;

b. No new wells shall be installed on Facility property unless it is demonstrated to EPA that such wells are necessary to implement the final remedy and the Facility obtains prior written approval from EPA to install such wells.

4. Additional Requirements

EPA is proposing that the following activities be implemented at the Facility:

A. Whenever requested by EPA and/or PADEP, the then current owner shall submit to EPA and/or PADEP a written certification stating whether or not the groundwater and land use restrictions are in place and being complied with;

B. EPA, PADEP and/or their authorized agents and representatives, shall have access to the Facility property to inspect and evaluate the continued effectiveness of the final remedy and if necessary, to conduct additional remediation to ensure the protection of the public health and safety and the environment upon the final remedy selection in the FDRTC.

In addition, the Facility owner shall provide EPA with a coordinate survey as well as a metes and bounds survey, of the Facility boundary. Mapping the extent of the land use restrictions will allow for presentation in a publicly accessible mapping program such as Google Earth or Google Maps.

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	With respect to soil, the Facility soils meet EPA's non-residential soil SL of 800 mg/kg for lead. EPA's proposed remedy is to restrict land use of the property to commercial or industrial purposes. With respect to groundwater, currently, GW is not used at the facility for any purposes. With respect to future uses, the proposed remedy requires groundwater use restrictions to

	minimize the potential for human exposure to contamination and protect the integrity of the remedy.
2) Achieve media cleanup objectives	EPA's proposed remedy meet the media cleanup objectives based on assumptions regarding current and reasonably anticipated land and water resource use(s). The remedy proposed in this SB is based on the current and future anticipated land use at the Facility as commercial or industrial. Lead contaminated soils at the site were removed to meet EPA's non-residential direct contact soil SL. An environmental covenant is already in place to restrict the land use of the property to commercial or industrial purposes. Groundwater at the site is not used as a source of drinking water. EPA's proposed remedy requires the implementation and maintenance of use restrictions to ensure that groundwater beneath Facility property is not used for any purpose except to conduct the operation, maintenance, and monitoring activities required by EPA. An environmental covenant is already in place to restrict the groundwater use at the facility.
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 and the Facility met this objective. The source of contaminants has been removed from the soil at the Facility and, thereby eliminating, to the extent practicable, further releases of hazardous constituents from on-site soils as well as the source of the groundwater contamination. Groundwater at the site is not used as a source of drinking water. The Facility and surrounding area are already being provided with potable water from the public water supply system. Therefore, EPA has determined that this criterion has been met.

Section 6: Evaluation of Proposed Remedy (continued)

Balancing Criteria	Evaluation
1) Long-term effectiveness	Groundwater is not used on the Facility for drinking water. The long term effectiveness of the proposed remedy will be maintained through the implementation of the institutional controls. Lead contaminated soils were removed and the soils at the facility meet the non-residential use standard. An EC is already in place to restrict the use of the property to commercial or industrial purposes.
2) Reduction of toxicity, mobility, or volume of the Hazardous Constituents	The reduction of toxicity, mobility and volume of hazardous constituents will continue by attenuation at the Facility. The reduction of toxicity, mobility, and volume of hazardous constituents has already achieved as the source of contaminants have been removed from the soil at the facility.
3) Short-term effectiveness	The remedy does not involve any construction activities. Therefore, no short-term risks to workers exists.
4) Implementability	EPA's proposed remedy is readily implementable. The Environmental Covenant is already in place for implementing the proposed remedial action.
5) Cost	EPA's proposed remedy is cost effective. The cost associated with implementation of ICs is minimal.
6) Community Acceptance	EPA will evaluate community acceptance of the proposed remedy during the public comment period, and it will be described in the Final Decision and Response to Comments.
7) State/Support Agency Acceptance	PADEP has reviewed and concurred with the proposed remedy for the Facility.

Section 7: Financial Assurance

EPA has evaluated whether financial assurance for corrective action is necessary to implement EPA's proposed remedy at the Facility. Given that EPA's proposed remedy does not require any engineering actions to remediate soil and groundwater and given that the costs of implementing institutional controls (estimated cost of less than $1000.00 per year) at the Facility

will be minimal, EPA is proposing that no financial assurance be required.

Section 8: Public Participation

Interested persons are invited to comment on EPA's proposed remedy. The public comment period will last thirty (30) calendar days from the date that notice is published in a local newspaper. Comments may be submitted by mail, fax, or electronic mail to Ms. Tran Tran at the contact information listed below.

A public meeting will be held upon request. Requests for a public meeting should be submitted to Ms. Tran Tran in writing at the contact information 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 this Facility. The Administrative Record is available at the following location:

U.S. EPA Region III
1650 Arch Street
Philadelphia, PA 19103
Contact: Ms. Tran Tran (3LC20)
Phone: (215) 814-2079
Fax: (215) 814 - 3113
Email: tran.tran@epa.gov

Attachments:

1. Attachment #1 – Figure 1 - Site Location Map
2. Attachment #2 – Figure 2 - Site Layout Map
3. Attachment #3 – Figure 3 - Site Aerial Photograph

Date: 5-4-17

Catherine A. Libertz

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

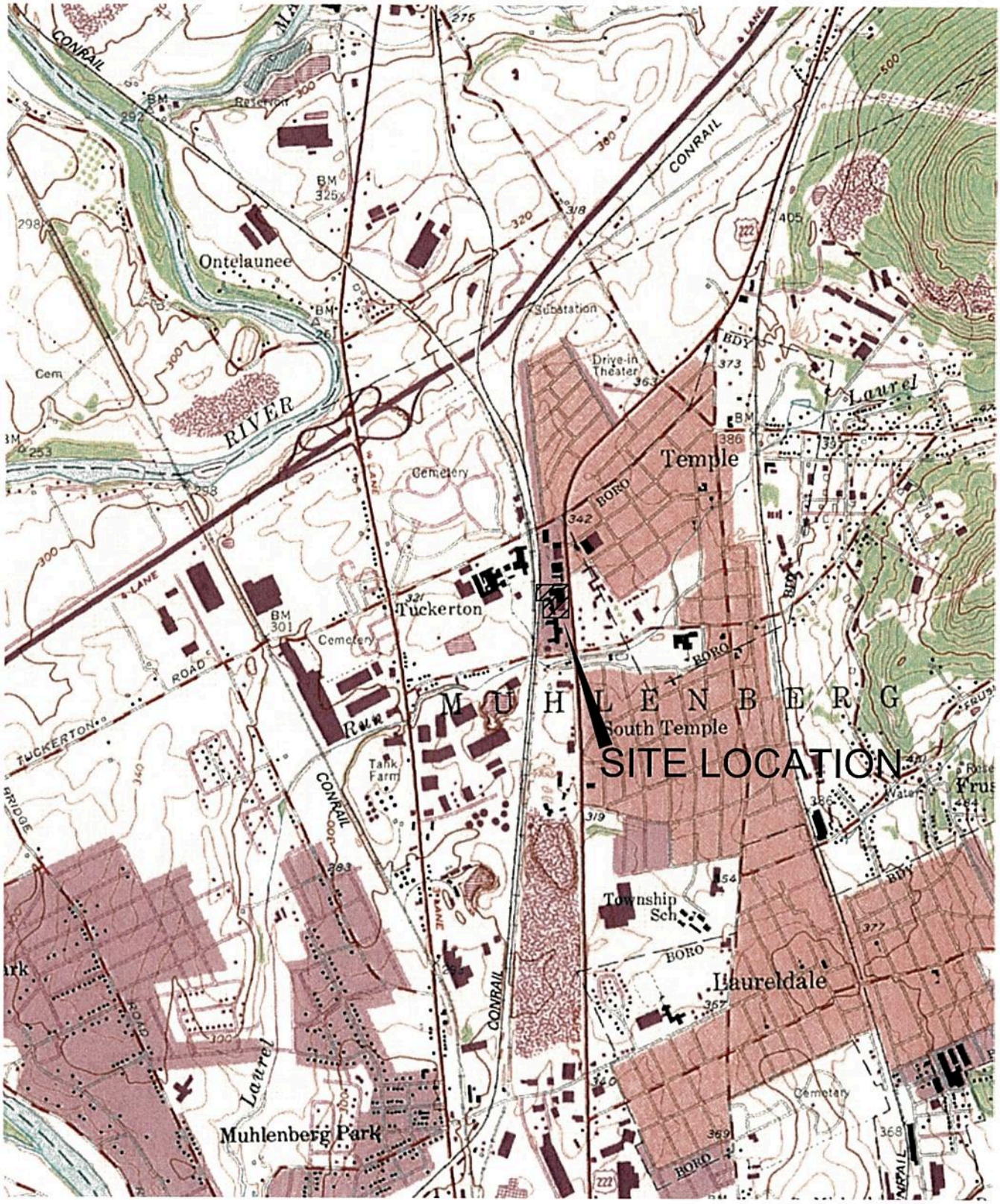
Section 9: Index to Administrative Record

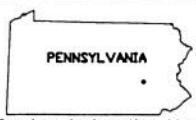
1. Act 2 Final Report, Kaiser Investment Company, January 2016
2. Off-site Private wells locations
3. Final Environmental Indicator Inspection Report, November 2002
4. PADEP's Approval of Final Act 2 Report, March 4, 2016
5. Kaiser Investment Company, Recorded Environmental Covenant

Attachments

Attachment 1

Figure 1 – Site Location Map





Quadrangle Location Map

0 2000 4000 Feet

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Source: U.S.G.S. Topographic Maps (7.5 Minute)
Temple, PA

Commonwealth of Pennsylvania
Department of Environmental Protection

Eltra Corporation
Temple, Pennsylvania

Figure 1

Site Location Map

FOSTER WHEELER ENVIRONMENTAL CORPORATION

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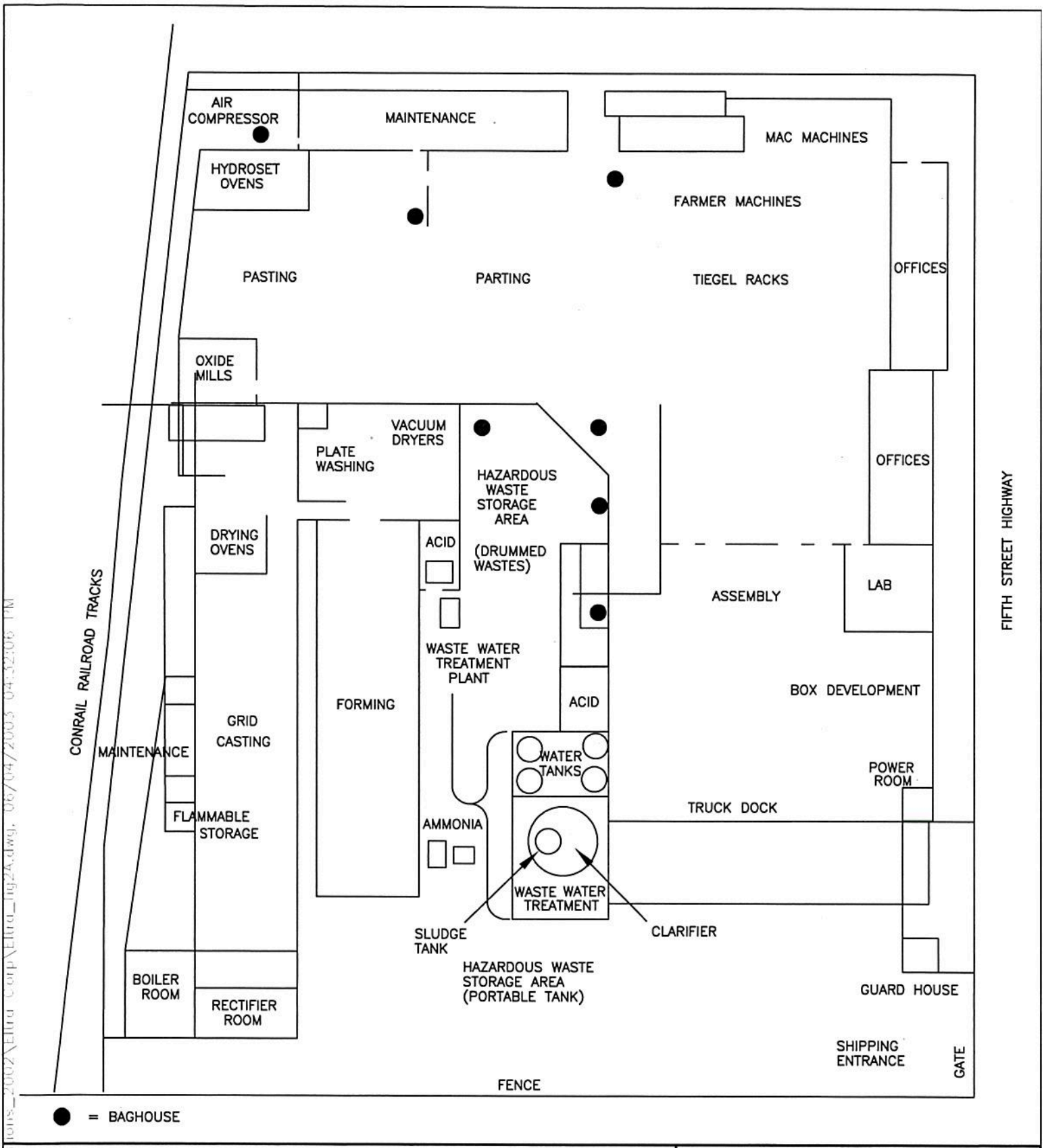
Attachment 2

Figure 2 – Site Layout Map



Commonwealth of Pennsylvania
Department of Environmental Protection

Eltra Corporation
Temple, Pennsylvania

Figure 2
Site Layout Map

FOSTER WHEELER ENVIRONMENTAL CORPORATION

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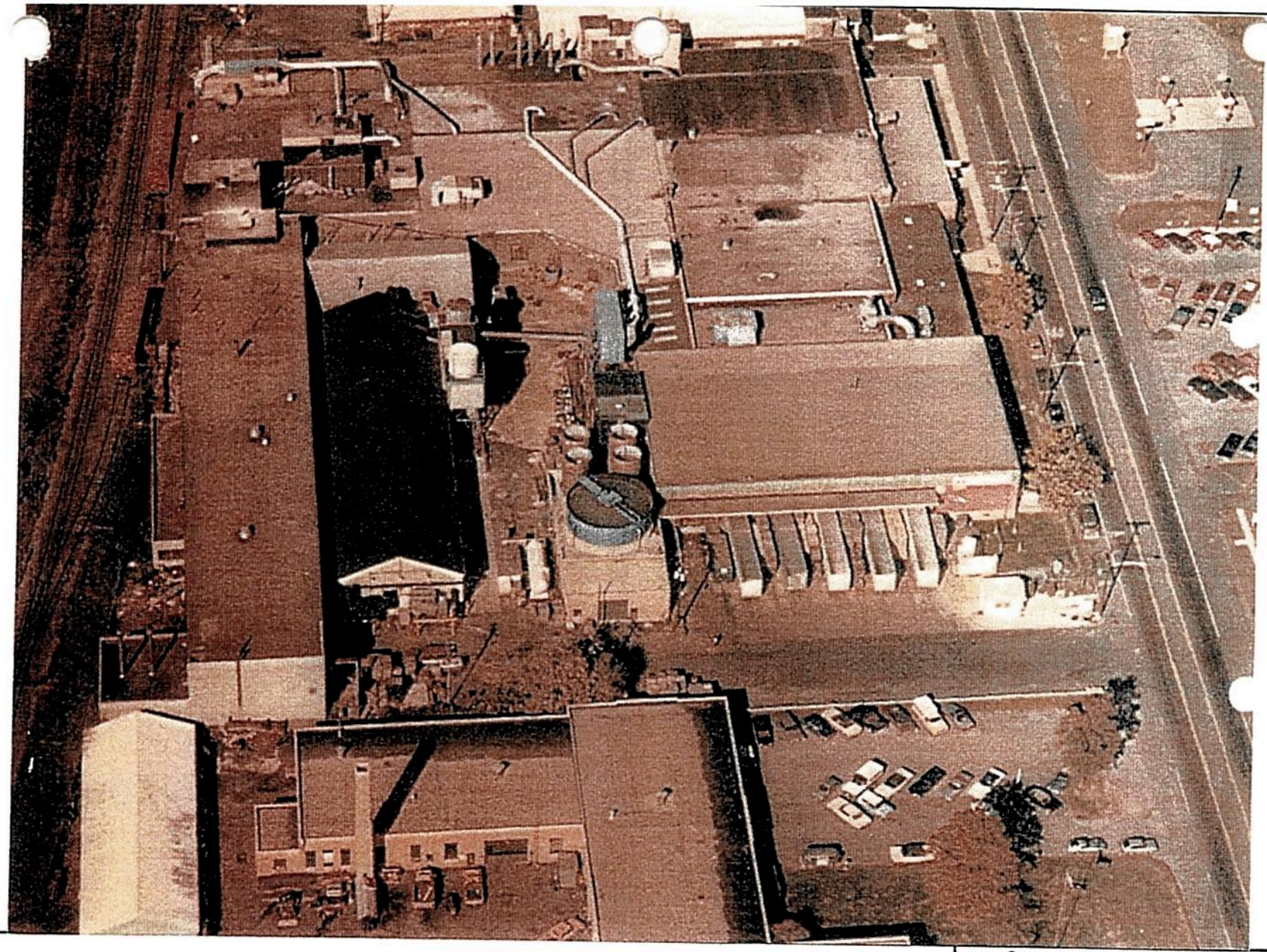
Attachment 3

Figure 3 – Aerial Photograph



Commonwealth of Pennsylvania
Department of Environmental Protection

Eltra Corporation
Temple, Pennsylvania

Figure 3
Aerial Photograph

FOSTER WHEELER ENVIRONMENTAL CORPORATION

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