



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III

STATEMENT OF BASIS

CRANE CHEMPUMP DIVISION OF TEIKOKU USA INC.
WARRINGTON, PENNSYLVANIA
EPA ID # PAD 003 916 798

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

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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 Crane Chempump Division of Teikoku USA, Inc. facility which was located at 175 Titus Avenue, Warrington, Bucks County, Pennsylvania 18976 (Facility). EPA's review of available information indicates 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

The Chempump Facility, encompasses approximately 10.6 acres of land in Warrington, Bucks County, Pennsylvania. From 1961 through 2003, the Facility operated at this address as the Chempump Division of Crane Company, a manufacturer of industrial and custom-made chemical pumps. Teikoku USA (a subsidiary of Teikoku Electric Manufacturing Co. Ltd. of Japan) purchased Crane's Chempump Division in March 2003 and operated at the Site through 2004. Chempump's manufacturing operations were relocated to 959 Mearns Road, Warminster, Pennsylvania in November 2004. The Facility was sold to Penn's Grant Realty (represented by Doylestown Real Estate) in November 2004.

There is currently one large building located on the 175 Titus Avenue property. This building is divided into three (3) leased tenant spaces and utilized for production, storage, and office purposes.

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The tenant leasing the largest space in the building is Limbach Inc., a mechanical contractor occupying approximately 30,000 square feet. They design, plan, and install energy-efficient and environmentally responsible heating, ventilating, air conditioning, plumbing, and process piping systems. Limbach also offers water treatment associated with maintaining efficient operations of heating and cooling equipment. Chemicals used for this process and stored on-site include, but are not limited to; oil, propylene glycol, boiler powered, alkalinity builder, inhibited muriatic acid, solar salt, sodium nitrate, and potassium hydroxide (stored in totes), cooling system corrosion inhibitor, potassium hydroxide, chlorinating concentrate, pressurized propane, nitrogen, and acetylene cylinders. Limbach Inc. does not generate hazardous waste at this location.

The next tenant, SnapCab (Bostock Co.) is a producer of elevator cabs and acquired their 27,000 square foot tenant space through Doylestown Real Estate in November 2004. Material used in the manufacturing of the elevator cabs includes Formica, wood, laminate, and five-gallon buckets of spray adhesive. The waste produced during production includes wood, cardboard, and dust. Snapcab does not generate hazardous waste at this location.

The third tenant, Curve Beam Extremity CT, is a manufacturer of medical diagnostic equipment. They occupy approximately 25,000 square feet of tenant space previously occupied by KP International Imported Cabinetry.

Chempump notified as a TSD in 1980, and operated at the Titus Avenue site as a Pennsylvania residual waste generator and a hazardous waste generator of less than 100 kg/month of non-acute hazardous waste.

Drinking water at the Site is supplied from the Warrington Township Water and Sewer Department, which operates nine (9) public wells drilled to depths between 300 and 670 feet in the Stockton Formation. According to the Warrington Township Water and Sewer Department, water from four (4) of the wells is treated using air strippers, which remove organic contaminants from the general area, and chlorine is added to all of the wells for disinfecting purposes (Warrington Township Water and Sewer Department, 2008). None of the contamination seen in the POTW wells is suspected to be attributed to the facility.

Section 3: Summary of Environmental History

Crane's Chempump Division began operations on June 25, 1961, as a manufacturer of industrial and custom-made chemical pumps. The manufacturing process involved the design, assembly, painting, and distribution of the chemical pumps. According to the former Crane Company - Chempump Division Manager, it is unknown what types or how wastes were handled from 1961 to 1980.

In August 1980, the Facility filed a Notification of Hazardous Waste Activity and submitted a Part A Application for Hazardous Waste Permit with USEPA (USEPA ID No. PAD003916798). The records submitted to USEPA indicated that Chempump was filing these documents for generation, transportation, and as a treatment/storage/disposal (TSD) facility. Additionally, a USEPA General

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Information form was submitted in November 1980. In December 1980, USEPA acknowledged receipt of the Part A Hazardous Waste Application and granted the Facility Interim Status to handle F003 and F005 waste (spent non-halogenated solvents).

EPA has identified 2 solid waste management units (SWMUs). The former solvent storage area (SSA), SWMU #1; and the former paint booth area (PBA), SWMU #2.

SWMU #1 – Former SSA

Chempump produced less than 100 kg/month (220 lbs/month) of non-acute hazardous waste. Beginning in 1980, this waste was stored in 55-gallon drums in the SSA until a waste management hauler transported the hazardous material off-site. The former SSA was located outside the production building at the southeastern end of the Site (see Figure 1). The storage area was 30 by 20 feet in size, paved, and surrounded by a chain-link fence. Access was for authorized personnel only, and the area was padlocked. During the 1989 assessment, this area reportedly contained approximately nine (9) 55-gallon drums of raw solvents, wooden pallets, and pump testing equipment. All drums were reportedly capped and grounded on metal racks. It was reported that no waste was stored in this area at the time of the 1989 assessment visit. Other raw materials previously stored in the SSA included volatile, flammable, and combustible solvents. These other materials included, but were not limited to, ethyl alcohol, acetone, and denatured alcohol. No releases were reported in this area, and there was no evidence of any spills or releases at the time of the assessment site visits on May 24 and June 2, 1989. Today, the area is paved and Bostock Inc. uses it for employee parking. No closure documentation for the SSA was found during 2009 EI Inspection file review. See 1989 assessment report for more details.

SWMU #2 – Former PBA

The former PBA was located inside the southeastern portion of the production building (see Figure 1). Pumps were placed in the paint booth and painted with a high pressure paint gun. The facility utilized a waterfall collection unit for collection of paint overspray. An alkaline chemical present in the water precipitated the paint to form a sludge. Once a year this sludge was collected in 55-gallon drums that were sealed and stored next to the paint booth until they were transported off-site. The paint booth had been in operation since approximately 1979. The only material stored there besides the paint sludge was wastewater from the paint booth. According to facility personnel at the time of the 1989 assessment, no releases were reported. See 1989 assessment report for more details.

Regulatory Site Investigations

See June 2009 EI Inspection Report - Table 3 for a list of facility Inspections.

Phase I Investigation, February, 2003

A February 2003 Phase I environmental site assessment (ESA) was completed by a contractor, ARCADIS, Inc. This Phase I ESA report was not made available to Environmental Indicator (EI) Report contractor URS.

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Phase II Subsurface Investigation, June, 2003

According to the June 2003 Phase II Investigation Report, the Phase I ESA identified the following environmental conditions/uncertainties: (1) an existing 35-year old, unregulated 1,000-gallon underground storage tank (UST) for heating oil located at the northeastern corner of the Property, the integrity of which was unknown, (2) former on-site septic tanks and associated leach field(s), and (3) conflicting information regarding the quality of groundwater associated with the former on-site water supply well. As a result of the Phase I findings, a Phase II subsurface investigation was conducted to evaluate whether the environmental conditions identified in the Phase I ESA had any impact on the property.

To evaluate groundwater quality at the Property, ARCADIS collected a groundwater sample from the formerly active, on-site water supply well (Figure 1). This well was recently decommissioned prior to URS' July 24, 2008, site visit. Water from this well was previously used to service rest rooms and water fountains at the Facility. The well had been constructed of six-inch diameter steel piping and had a total depth of 150 feet bgs. URS observed a grout/cement mixture within the well casing. Well closure documentation was not made available to URS. Three (3) well volumes of water (750 gallons) were purged from the well by ARCADIS prior to sampling to ensure that a representative groundwater sample was collected. The water sample (SW-1) was analyzed for unspecified lists of volatile organic compounds (VOCs) via USEPA Method 8260, semi-volatile organic compounds (SVOCs) via USEPA Method 8270, and polychlorinated biphenyls (PCBs) via USEPA Method 8081. The sampling results indicated no constituents exceeded PADEP or EPA action levels. Results can be viewed in the administrative record.

Limited Phase II Report, October, 2004

URS reviewed an October 19, 2004 Phase II report completed by Gilmore & Associates, for Penn's Grant Realty Corporation. The report summarized a September 2004 Phase I ESA completed by Gilmore. This Phase I ESA report also was not made available to URS. The Phase II report addressed the following environmental conditions/uncertainties: (1) soil and groundwater quality at the former septic tank locations, (2) possible lead based paint in the two former 100,000-gallon aboveground storage tanks (ASTs) (formerly used for water storage), (3) soil and surface water quality in the area of the outfall located at the northeastern corner of the Property.

Complete details for these reports, including sampling data, can be found in the individual reports contained in the AR. The sampling results indicated no constituents exceeded PADEP or EPA action levels. There currently are no institutional or engineering controls at this facility, and according to the July 24, 2008 EI Inspection Report the facility well was decommissioned.

Since October 2005, Chempump has been manifesting waste off site as a conditionally exempt small quantity generator, from their Mearns Street facility. The wastes generated by Chempump continue to be paint wastes and non-chlorinated solvents.

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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 indicator on May 24, 2017. The EPA has determined that the Facility met the current human exposures under control indicator on May 24, 2017.

In May 2017, EPA completed an evaluation of available information and issued "Yes" determinations for "Migration of Contaminated Groundwater Under Control" and "Current Human Exposures Under Control" EIs. EPA Environmental Indicators are a point in time means of evaluating and reporting on the acceptability of current site conditions (i.e., they are interim milestones and not final remedy or site closure goals).

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 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: Grant Dufficy
Phone: (215) 814-3455
Fax: (215) 814-3113
Email: dufficy.grant@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. Grant Dufficy. EPA will hold a public meeting to discuss this proposed decision upon request. Requests for a public meeting should be made to Mr. Grant Dufficy.

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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. Grant Dufficy at the address listed above.

Date: 6-6-17

A handwritten signature in cursive script, reading "Catherine A. Libertz", written over a horizontal line.

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

Index to Administrative Record

Notification of hazardous waste activity, Crane Company – Chempump Division, (USEPA files) August 15, 1980

Hazardous waste permit application, Crane Company – Chempump Division, – US EPA I.D. Number – PAD003916798 (USEPA files) August 18, 1980

USEPA acknowledgement of notification of hazardous waste activity, (USEPA files) October 9, 1980

Letter to Crane Company from USEPA regarding acknowledgment of application for a hazardous waste permit, also includes attachments regarding paint wastes and waste amount (USEPA files) December 29, 1980

Letter to Crane Co. from PADEP requesting formally for part B of the hazardous waste management facility permit application (PADEP files and USEPA files) February 23, 1983

Letter to Crane Company from PADEP changing the interim status stating the facility is no longer regarded as a TSD facility (PADEP files) February 10, 1984

EPA Phase II Preliminary Assessment Report of Crane Company – Chempump Division, Contract 68-01-7346, (USEPA files) November 21, 1989

Above Ground Storage Tank System Closure Notification Form (PADEP files) March 4, 2005

Letter to Crane Company from USEPA regarding notification of RCRA corrective action baseline (USEPA files) April 6, 2007

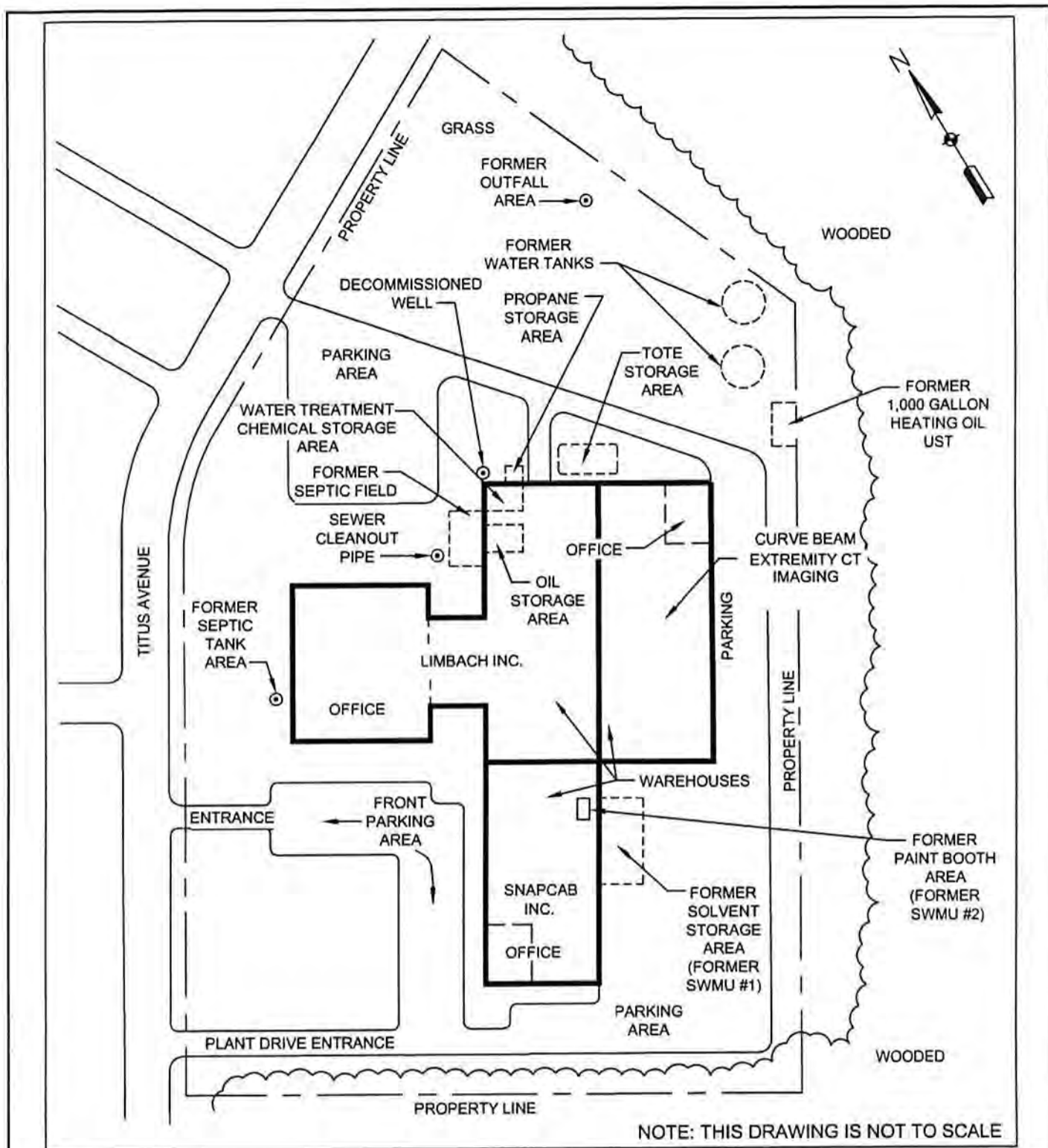
Letter to Crane Company from PADEP regarding RCRA EI Inspection, (PADEP files) April 11, 2008

Environmental Indicator Inspection Report, Chempump Division of Teikoku, USA Facility, PADEP GTAC4-0-252, URS Project # 20497883 (USEPA files) June 2009

Human Health Environmental Indicator, Chempump Division of Teikoku, USA Facility, (USEPA files) March 2017

Groundwater Environmental Indicator, Chempump Division of Teikoku, USA Facility, (USEPA files) March 2017

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TITLE	GENERAL LAYOUT OF SITE SHOWING AOCs / SWMUs
PROJECT	Former Chempump Division of Teikoku USA 175 Titus Avenue, Warrington, PA 18976

SOURCE:
Environmental Priorities Initiative Preliminary
Assessment - NUS Corporation, November 1989.

Figure 1

