

STATEMENT OF BASIS

Avery Dennison - Fasson Roll Division, Quakertown, Pennsylvania
PAD 053 227 752

March 2000

I. INTRODUCTION

Avery Dennison - Fasson Roll Division (hereafter called the "Facility") is subject to an Environmental Protection Agency (EPA) program promulgated under the Hazardous and Solid Waste Amendments (HSWA). This program is generally known as "Corrective Action" and is designed to insure that facilities subject to HSWA have investigated and cleaned up any releases of hazardous waste or constituents that may have occurred at their property. Although not a permitting program per se, EPA uses the administrative procedures of the Hazardous Waste Permit Program, found in 40 CFR Part 124, to finalize decisions under the HSWA Corrective Action Program.

This Statement of Basis is for Avery Dennison - Fasson Roll Division, Quakertown, Pennsylvania. It describes the history of environmental contamination and cleanup at the Facility and it explains the reason for EPA's proposal regarding corrective action at the Facility.

After a thorough site inspection of the Facility, and an evaluation of past environmental cleanup activities and current operating procedures, EPA believes that no further corrective action is necessary at the Facility at this time. The purpose of this document is to solicit public comment on the proposal that no further corrective action is required at the Facility.

II. FACILITY BACKGROUND

Avery Dennison - Fasson Roll Division is located at 35 Penn-Am Drive in Richland Township, one mile northwest of the Quakertown Borough boundary, Bucks County, Pennsylvania. The Facility manufactures self-adhesive papers, films, and foils. It has been in operation since July 1970. The Facility is located in a mixed residential/commercial/industrial area (see Figure 1).

Prior to the second quarter of 1997, the Facility used solvent-based materials in its manufacturing process. In the second quarter of 1997, the use of all solvent-based products in the manufacturing process was discontinued and replaced by water-based materials, thereby reducing the generation of hazardous waste.

Waste materials that are currently generated at the Facility include waste aqueous emulsions, waste machine oil, and wastewater. The wastewater is sent to the sanitary sewer for treatment. All other waste is temporarily stored on-site for less than 90 days until its removal by a licensed transporter.

III. SUMMARY OF FACILITY AREAS - The following units manage waste material or managed waste/recovered material in the past.

Current Waste Management Units

Hazardous waste storage building - A permanent, locked building with proper labeling and secondary containment is used to store drums containing hazardous waste before disposal. Hazardous waste is stored for less than 90 days and shipped off site using a licensed hazardous waste transporter.

Former Waste Management/Recovered Material Units

Underground waste storage tanks #23 and #31 - These tanks were located in the former underground tank storage area (Figure 2, Area A). The tanks were used to store certain waste flammable liquids that were generated in the production process. The tanks were located in a tank field containing 31 tanks. The other tanks were used to store raw materials for the Facility operations. There were no reported releases from tank #23. A release from the pipeline to tank #31 was detected in March 1992. Details of this release are provided below in the History of Release and Cleanup Section. There were no reported releases from the raw material storage tanks. The entire tank field was closed in accordance with the Underground Storage Tank closure requirements of the PA Department of Environmental Protection (formerly the PA Department of Environmental Resources). The closure is documented in the Avery Dennison Underground Storage Tank Closure Reports dated March 16, 1992 and November 13, 1997, and the Tank Field Environmental Monitoring Report dated August 1994.

Waste drum storage area - Prior to 1984, a 40' by 40' concrete pad located approximately 200 yards north of the rear of the production building was used to store drums containing waste material before off-site disposal. The area was used to store flammable solids and possibly solvents. There were no reported releases from this unit.

Carbon absorption beds and condensation tank - These units were located in the former solvent recovery area (Figure 2, Area B). They were used as a solvent recovery system. A release from the condensate tank occurred in January 1989. Details of this release are provided below in the History of Release and Cleanup Section. The system was removed in August 1998.

Recovered solvent storage tanks #32 and #32A - Tank #32 was located in the northeastern corner of the former solvent recovery area (Figure 2, Area B). Tank #32 had a capacity of 10,000 gallons and was used to store a solvent blend (approximately 50% heptane and 50% toluene) that was obtained from the solvent-recovery operation. In late 1986 the tank was replaced by a 20,000 gallon tank (tank #32A) with secondary containment features. Tank #32A was removed in August 1998 in accordance with the

Underground Storage Tank closure requirements of the PA Department of Environmental Protection. The closure is documented in the Avery Dennison Underground Storage Tank Closure Report dated October 15, 1998.

IV. HISTORY OF RELEASE AND CLEANUP

Area A - Tank Field Area (See Figure 2)

March 2, 1984 - Approximately 150 gallons of a toluene and heptane blend was released from a tank truck to the asphalt driveway. The spill was contained, collected, and placed into drums for proper disposal. The Bucks County Health Department approved the cleanup on March 9, 1984.

January 18, 1989 - A small quantity of adhesive (less than one gallon) was washed into the storm drain by the fire suppression system water after an explosion and fire in the #1 mixer. All material was captured at the storm drain outfall with sorbent materials and placed in a container for proper disposal. Process modifications and new procedures were implemented, as well as a process safety study, to prevent a recurrence. Adequate cleanup activities were documented on the January 18, 1989 Pennsylvania Department of Environmental Resources inspection report.

March 1992 - Hydrocarbon contamination was detected within a soil release detection vapor well located in the tank field area between tank #23 and #24, adjacent to several tank fill pipelines. Pipeline integrity testing revealed that the pipeline to tank #31 was leaking. A release of an undetermined quantity of adhesive was confirmed during excavation of the area on March 6, 1992. Damage to another pipeline during the excavation resulted in a secondary release of approximately 35 gallons of a similar product. This viscous material was captured and placed into drums for proper disposal. Remedial efforts included the excavation of all contaminated gravel, removal of the sub-grade pipelines, and the installation of a groundwater monitoring well to confirm that groundwater had not been impacted by the events. Cleanup activities for this incident were documented in the Tank Field #1 and #2 Environmental Monitoring Report (Groundwater Technology, March 1994, revised August 1994). The Pennsylvania Department of Environmental Resources approved the adequacy of the cleanup on September 15, 1994.

Area B - Solvent Recovery System and Fuel Oil Storage Area (See Figure 2)

October 6, 1986 - A corrosion-induced rupture occurred in a heating oil recirculating line during preparation for a boiler startup. The loss was discovered when fuel oil appeared at ground surface emanating from the pipeline which was buried three feet below grade. A prompt response was initiated. Surface material was removed with sorbent pads and impacted soil was excavated and removed. A total of 600 gallons of oil was recovered.

The Bucks County Health Department approved the cleanup on October 24, 1996.

October 1986 - A groundwater monitoring system was installed in September 1986 to monitor the groundwater around the underground tank areas at the facility. The following month elevated levels of toluene and ethylbenzene were detected in the area of the solvent storage tank (tank #32) and the fuel oil storage tank (tank #33). Integrity test performed on the tanks indicated that tank #32 was leaking. As a result, tanks #32 and #33 were replaced with tanks equipped with secondary containment (tanks #32A and #33A). After the tanks were removed, they were inspected and no leaks were found. Facility personnel believe that the groundwater contamination was caused by dripping from the solvent recovery system. A closed loop system that eliminated this release was installed in the solvent recovery system. The cleanup of the area included the excavation and disposal of approximately 1,400 cubic yards of soil during the tank replacement. In June 1987, a groundwater recovery and air stripper treatment system was also installed to clean up the groundwater contamination. The groundwater treatment system operated from June 1987 until November 1992. Treatment was discontinued when contamination was no longer detected in the groundwater. Additional contaminated soil was removed during the removal of tanks #32 and #33 in 1998. The groundwater cleanup is documented in the Groundwater Technology Report, dated January 26, 1993. The PA Department of Environmental Resources approved the cleanup on June 4, 1993. The closure of tanks #32A and #33A is documented in the Avery Dennison Underground Storage Tank Closure Report dated October 15, 1998. Additional soil and groundwater samples were taken in 1999, see details described below.

January 27, 1989 - The solvent recovery system condensate pump failed due to an undetermined thermal overload. The pump failure allowed the condensate tank to overflow and flood the secondary containment vault. Condensate spilled to the gravel and migrated into an adjacent sump which was connected to the storm sewer. Sorbent material that was maintained in the storm drain outfall prevented the accidental release from migrating beyond the outfall. Sorbent materials were used to capture all solvent, estimated at 70-80 gallons. This material was placed into containers for proper disposal. A high level alarm was installed on the condensate collection tank to give warning of a future failure. The sump and surrounding soils were removed for proper disposal. Soil testing, completed during demolition of solvent recovery system in August 1998, confirmed that the soil was not contaminated. (Epsys Corporation letter dated October 1998).

June 27, 1994 - Activation of a release detection alarm was reported to the Pennsylvania Department of Environmental Resources. Subsequent investigations included tank integrity testing and the physical uncovering and inspection of the suspected Underground Storage Tank system. Inspection of the surrounding fill indicated no evidence of a release. A defective fitting to the fill pipe of the Underground Storage Tank system was identified and repaired. Vapor levels indicated no contamination.

Furthermore, no contamination was detected in a groundwater sample collected from a nearby monitoring well. By letter dated September 9, 1994 to PADEP, Groundwater Technology, Inc. documented the findings of the investigation.

January 30, 1995 - The carbon absorption system decanter overflowed, releasing an estimated five to 10 gallons of solvent to adjacent soils. The incident appeared to be caused by abnormal pressure in the adjacent solvent recovery underground storage tank. Nineteen drums of soil were excavated for disposal. Groundwater Technology, Inc. conducted post-excavation soil and groundwater sampling. The investigation report, dated November 10, 1995, documented that the groundwater and remaining soil were not contaminated. PADEP concurred with Groundwater Technology's report in a letter dated March 5, 1996.

December 15, 1995 - Approximately 15 gallons of hydraulic oil was released to the soil when a hydraulic line ruptured on a BFI Waste Systems truck while it was in the process of loading a roll-off container. The incident occurred on the gravel parking area east of the plant. BFI employed a contractor to remove gravel and soil to a depth of four inches where the spill occurred. The contaminated gravel and soil were placed into a roll-off container for proper disposal. BFI has been advised to discontinue the practice of using that parking area to park roll-off containers. Cleanup activities were documented in the BFI letter dated December 19, 1995.

February 1999 - October 1999 - Confirmation Sampling - Follow-up sampling of soil in February 1999 and groundwater in March and October 1999 confirmed that the area is no longer contaminated. The results of the investigation are documented in the ENSR Site Investigation Report dated September 1999, and the Avery Dennison Letter Report dated December 22, 1999.

V. POTENTIAL EXPOSURE TO CONTAMINATION

There are four media through which humans could be exposed to potential releases:

- Air: Currently there is no known or reasonably suspected contamination to either outdoor air, or indoor air from any of the Waste Management Units at the Facility.
- Groundwater: Currently there is no known or reasonably suspected contamination of the groundwater at the Facility.
- Surface Water: Currently there is no known or reasonably suspected contamination to the surface water from the Facility.
- Soil: Currently there is no known or reasonably suspected contamination to the soil at the Facility.

the Facility.

Based on a review of all the information received concerning previous spills at Avery Dennison - Fasson Roll Division, as well as the current conditions of the Waste Management Units, the EPA has determined that no further corrective action is required at this Facility at this time.

VI. PUBLIC PARTICIPATION

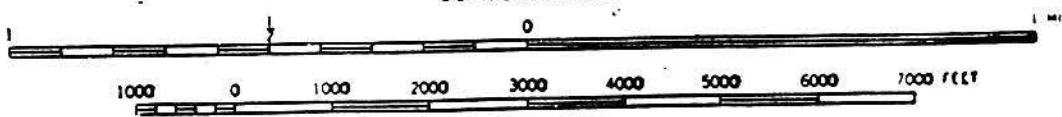
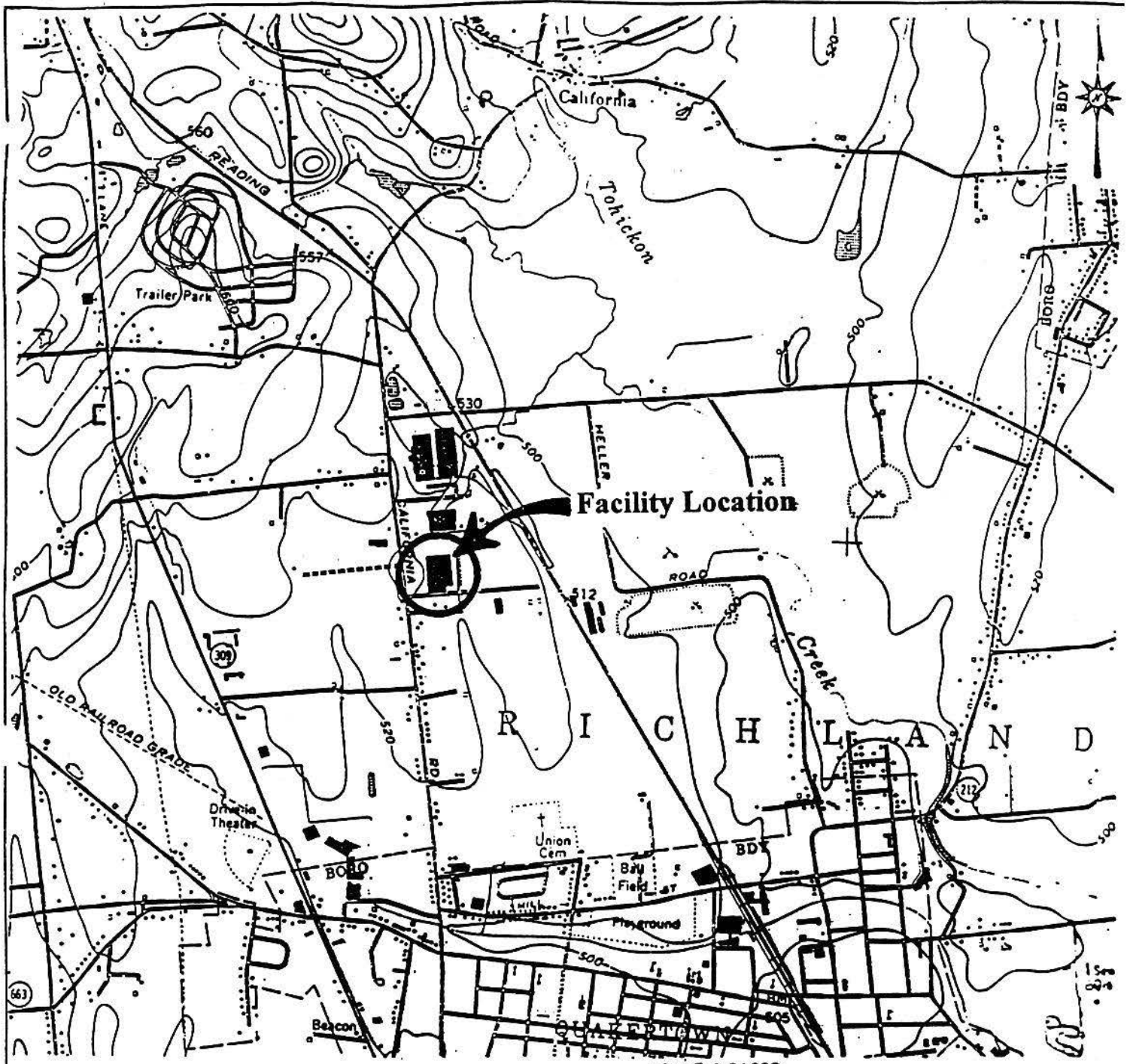
EPA is requesting comments from the public on its proposal that no further corrective action is required at this Facility at this time. The public comment period will last forty-five (45) calendar days from the date that a notice of this proposal is published in a local newspaper on March 31, 2000. Comments may be sent to EPA in writing at the EPA address listed below. All commentors will receive a copy of EPA's final decision and a copy of the response to comments.

A public meeting will be held upon request. Requests for a public meeting should be made to Ms. Maureen Essenthier of the EPA Regional Office (215-814-3416).

The Administrative Record contains all information considered by EPA when making this proposal that no further corrective action is required at this Facility at this time. The Administrative Record is available at the following location:

U.S. EPA Region III
1650 Arch Street
Philadelphia, PA 19103-2029
Hours: Mon-Fri, 9:00 A.M. - 5:00 P.M.
Contact: Maureen Essenthier
Voice: (215) 814-3416
Fax: (215) 814-3113
E-mail: essenthier.maureen@epa.gov

Following the forty-five (45) calendar day public comment period, EPA will prepare a final decision which will address all written comments and any substantive comments presented verbally at a public meeting, if one is held. This final decision will be incorporated into the Administrative Record. If the comments are such that significant changes are made to the proposal that corrective action is not needed at this Facility, EPA will seek public comments on the revised proposal.



SOURCE: QUAKERTOWN, PENNSYLVANIA
7.5 MINUTE QUADRANGLE

CONTOUR INTERVAL 20 FEET

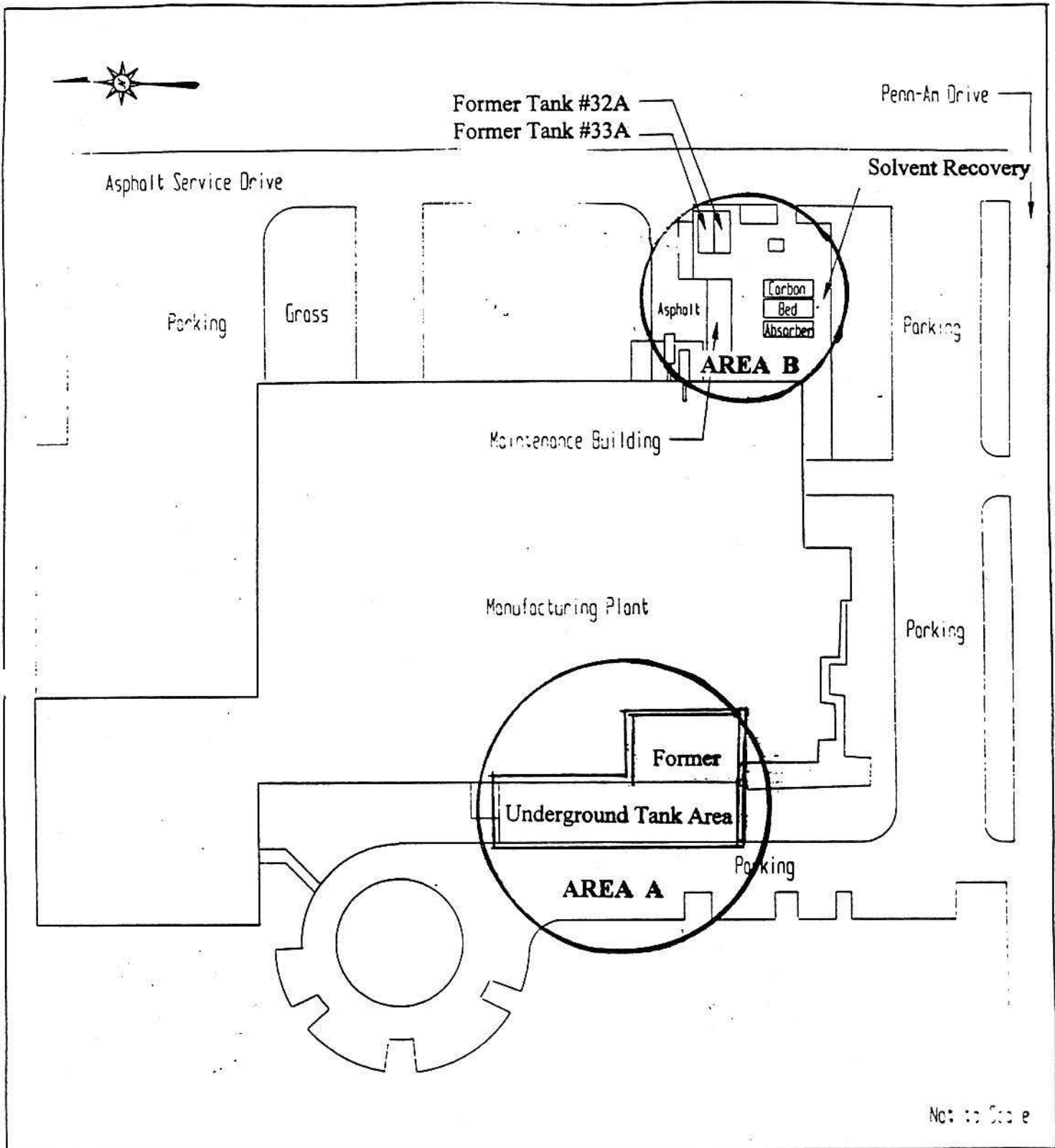
SITE LOCATION MAP - 35 PENN AM DRIVE

EPSYS Corporation
ENVIRONMENTAL PROTECTION SYSTEMS
A SUBSIDIARY OF DENAEE ASSOCIATES
HARRISBURG, Pa. 17111

AVERY DENNISON CORPORATION
QUAKERTOWN, PA

PROJECT NO. : 983895

Figure 1



SITE PLAN

EPSYS Corporation
 ENVIRONMENTAL PROTECTION SYSTEMS
 A SUBSIDIARY OF BENATEC ASSOCIATES
 HARRISBURG, Pa. 17111

VERY DENNISON CORPORATION
 QUAKERTOWN, PA

PROJECT NO. : 983895

Figure 2