



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III

STATEMENT OF BASIS

FORMER NUKOTE INTERNATIONAL IMAGING FACILITY

1 Imaging Lane
DERRY, PENNSYLVANIA

EPA ID # PAD 042507178

Prepared by
Corrective Action Branch No 2
Land, Chemical and Redevelopment Division
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List of Acronyms

AOC	Areas of Concern
AR	Administrative Record
AUL	Activity and Use Limitations
EPA	Environmental Protection Agency
FDRTC	Final Decision Response to Comments
GPRA	Government Performance and Results Act
MCL	Maximum Contaminant Level
PADEP	Pennsylvania Department of Environmental Protection
RCRA	Resource Conservation and Recovery Act
RFA	RCRA Facility Assessment
RSL	Regional Screening Level
SB	Statement of Basis
SHS	Pennsylvania's Statewide Health Standards
SWMU	Solid Waste Management Unit
UECA	Uniform Environmental Covenants Act
µg/L	Micrograms/Liter
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 decision for the former Nukote Imaging International facility located at 1 Imaging Lane, Derry, Westmoreland County, Pennsylvania 15627 (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 Facility is situated on approximately 13 acres of land located in Derry Township, Westmoreland County, Pennsylvania. Land use in the surrounding area is mainly agricultural and light industrial, with small residential developments located east of the Facility. The Facility is bound on the south by Malone Road. To the east is a residential area, followed by the Derry Area Senior High School. A light industrial facility is located immediately north of the Site. The area west of the Site is mainly forested.

Access to the Facility is via Imaging Lane. The Facility's electric is supplied by Allegheny Power. Natural gas is supplied by Dominion Gas. Sewer is supplied by Derry Township. Potable water is supplied to the Facility and surrounding areas by the Municipal Authority of Westmoreland County (MAWC).

Prior to 1946, the property was used as farmland. In 1946, the property was purchased by Pioneer Fuel who constructed an industrial facility. In 1964, Pioneer Fuel sold the property to Keystone Alloys. Records of the activities performed at the Site by Pioneer

Fuels and Keystone Alloys at the Site are incomplete.

In 1966, Chamberlain Manufacturing Corporation (Chamberlain) purchased the property from Keystone Alloys. Chamberlain manufactured aluminum siding, storm doors, and windows. Chamberlain operated an aluminum anodizing line, which included several concrete dip tanks located at the western end of the building. The number and exact locations of the dip tanks in use during Chamberlain's ownership are unknown. The dip tanks reportedly were removed, backfilled and covered with concrete according to USEPA files (September 1990). Chamberlain continued production at the Site until 1977, when the property was sold to Imaging Systems Corporation (ISC), a manufacturer of toners and developers for copiers and printers.

In 1978, Pelikan, Inc. (Pelikan) leased the property from ISC and continued with the production of toners and developers. Pelikan eventually purchased the property from ISC in 1989. Pelikan continued production until 1995 when the company was sold to NuKote. NuKote continued with the manufacture of toners and developers until 1998, at which time operations ceased. Nukote completed a Phase II site characterization in November 1999 to allow for the closure/sale of the NuKote facility.

Section 3: Summary of Environmental History

The Facility, consisted of a 110,000 square foot building divided into three primary areas. These areas included the south section, the central section, and the north section. The south section formerly held the fluid coating room, the developer packaging room, the raw material storage area, and the pilot plant room. The north section formerly held the premix department, the milling/classifying department, the toner packaging room, quality control laboratories, the printing line, and the compressor room. Three baghouses were located directly outside of the northern section. The central section included the shipping/receiving area, the final product storage area, the loading dock, a drum storage area, and a hazardous materials storage shed.

On November 17, 1980, the Facility applied for a hazardous waste permit, which included process codes S01 (container storage), S02 (tank storage), and S03 (storage in waste piles). USEPA acknowledged their application on January 20, 1981. According to the application, the processes performed at the Site generated hazardous wastes associated with waste codes D001, D002, K054, F002 and U226.

On July 23, 1981, the Facility indicated to USEPA that the maximum capacity for hazardous waste storage was thirty 55-gallon drums. There is no evidence available to URS (EPA's Contractor) implying or stating that tank or waste pile storage occurred on-site as indicated on their November 17, 1980, hazardous waste permit application. On May 21, 1982, USEPA determined that the Facility was an operator of a hazardous waste management facility meeting the Section 2005(e) RCRA Interim Status requirements.

In March 1995, Nukote requested that PADEP transfer permit numbers. Nukote refiled as a small quantity generator of hazardous wastes and indicated the hazardous wastes generated at the site now had EPA waste codes of F001 and F003.

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On July 29, 1998, the Facility notified PADEP Bureau of Air Quality (BAQ) that it had officially ceased operations at the Site, which was confirmed during PADEP's July 7, 2005 general inspection. In addition, it was noted that three new tenants now occupied the building. These tenants included DAPI (a steel processor); Steel Tech (a stainless-steel trailer hitch maker); and Mean Green (a vehicle starter and alternator repair service). According to the PADEP inspection report, DAPI had occupied the building since 2003. During the EPA contractor's August 2008 site visit, it was noted that Steel Tech no longer operated at the Site.

Summary of Soil Results

In 1999, ITC (the Facility Contractor) collected 22 surface and subsurface soil samples using direct-push sampling methods. Soil samples were collected at the three septic tank locations (SS1-01, SS1-02, SS1-03, SS2-01, SS2-02, SS2-03, SS3-01, SS3-02, and SS3-03), beneath the loading dock (LD02), at the hazardous materials storage shed/hazardous waste drum storage area (HZ01, HZ02, and HZ03), in the vicinity of the baghouses (BH-01, BH-02, and BH-03), from a stained soil area located north of the storage area portion of the production building (SB01), and from the boreholes of the seven attempted monitoring wells.

In 2000, ITC collected additional soil samples during drilling of monitoring wells MW08 and MW09A. Soil samples were also collected from SUMP1 and SUMP2, located inside of the building.

The 2000 monitoring well soil samples were also analyzed for SPLP VOCs, SPLP SVOCs, SPLP cyanide, and SPLP metals

Sampling results showed that levels of VOCs, pesticides, PCBs, and SVOCs did not exceed either the PADEP Residential or Non-Residential MSCs, and were within the acceptable range for EPA RSLs for residential soils.

Arsenic was detected at levels ranging from 3.8 to 46 mg/kg in facility soils. The PADEP MSC for Arsenic in soils is 12 mg/kg. These levels are consistent with elevated arsenic concentrations where naturally occurring, and not related to site operations.

Based on 1999 and 2000 sampling results, EPA concludes that site soils are not impacted above appropriate residential or non-residential standards.

Summary of Groundwater Results

In the 1999 investigation, ITC collected one round of groundwater samples from MW04, MW06, and MW07, and from a direct-push boring (SS2-03) installed in the vicinity of septic system #2. The completed wells were installed in shallow bedrock with depths ranging from approximately 13.5 to 115 feet below ground surface (bgs).

The groundwater samples collected from MW06 and MW07 were analyzed for the following parameters:

- Target Compound List (TCL) Volatile Organic Compounds (VOCs) via USEPA Method 8260B;
- TCL Semivolatile Organic Compounds (SVOCs) via USEPA Method 8270C;

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- Pesticides via USEPA Method 8081;
- Polychlorinated Biphenyls (PCBs) via USEPA Method 8082;
- Dissolved Target Analyte List (TAL) metals via USEPA Method 6010B/7470A; and
- Total cyanide via USEPA 9012A.

In March 2000, ITC re-sampled MW04, MW06, and MW07. In addition to the monitoring well samples, ITC collected one water sample from each of two sumps (SUMP GW-1 and SUMP GW-2) located inside of the building (of Figure 1). One sump was located in the former raw material storage area and the other was located in the former compressor room. These sumps reportedly received drainage from 31 floor drains located in the pilot plant room/raw materials storage area and two floor drains located in the compressor room.

The March 2000 groundwater and sump water samples were analyzed for total TAL metals only; and ITC re-sampled MW04, MW06, MW07, SUMP1, and SUMP2 in April 2000 and analyzed them for dissolved TAL metals.

ITC collected an initial round of groundwater samples from newly installed wells MW08 and MW09A in May 2000. These two wells, along with MW04, MW06, and MW07, were re-sampled in October/November 2000. The groundwater samples were analyzed for the same parameters as the 1999 groundwater samples listed above. Monitoring wells MW08 and MW09A were not analyzed for pesticides and PCBs in May 2000.

Based on groundwater sampling conducted in 1999 and 2000 by ITC, groundwater at the Site appears to be impacted above the PADEP Residential and/or Non-Residential Used Aquifer Groundwater MSCs and EPA MCLs by metals (including aluminum, iron, lead, manganese, and thallium). EPA has concluded these exceedances are related to the background levels of these metals in the surrounding soil and/or geologic formations (sandstone, shale, and coal) and not a result of site operations. Synthetic Precipitation Leaching Procedure (SPLP) analyses performed on soil samples collected by ITC during drilling of MW08 and MW09A in May 2000, which indicate the presence of aluminum, iron, lead, and thallium in the resultant leachate above the Residential and Non-Residential Groundwater MSCs. Upgradient well MW04 is located on the eastern side of the site and has elevated levels of dissolved metals (iron and aluminum) found in the samples. Groundwater flow on this site is from east to west.

Based on the latest facility Phase I and Phase II data, EPA does not believe there are any completed pathways or concerns for contaminated groundwater exposures at the Nukote Facility at this time. EPA has concluded that no Institutional Controls or Environmental covenants are required at this time.

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 current human exposures under control indicator on July 3, 2019. The EPA has determined that the Facility met the migration of contaminated groundwater under control indicator on August 16, 2019.

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.

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: 08/28/2019



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Preliminary Assessment of Pelikan, Inc. for Hazardous Site Control Division of USEPA – USEPA files - September 4, 1990

Operating permit renewal (65-399-020) December 8, 1993 – PADEP files. June 6, 1994: Letter from PADER to SWRO regarding the correction

Phase II Environmental Site Assessment Report of Imaging Lane property, prepared by IT Corporation, Inc., November 1999

Supplemental Site Visit conducted by the IT Corporation – PADEP files - February 7, 2001

Environmental Indicator Inspection Report, Prepared for PADEP by URS, October 2009, under Contract GTAC4-0-301

