



UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
STATEMENT OF BASIS  
L-3 Communications, Electro Fab Division  
Croydon, PENNSYLVANIA  
EPA ID NO. PAD 054732557

## **I. Introduction**

The United States Environmental Protection Agency (EPA) has prepared this Statement of Basis (SB) for the L-3 Communications, Electro Fab Division facility located at 960 River Road, Croydon PA 19021 (Facility). EPA's review of available information indicates that there are no unaddressed releases of hazardous waste or hazardous constituents from the Facility. Based on that assessment, our 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 V, Public Participation, for information on how you may review the AR.

## **II. Facility Background**

The Facility is located at 960 River Road in Croydon, Bristol Township, Bucks County, Pennsylvania, as shown in Figure 1. The Facility is bordered by commercial and light industry operations. A small residential area is located approximately 400 feet to the east of the Facility. The Facility covers one acre.

From 1967 to Spring 1999 the property was owned by Aydin Electro Fab. In Spring 1999, Aydin Corporation was acquired by L-3 Communications, Inc, which continues to operate and manufacture the Electro Fab Division.

## **III. Summary of Environmental History**

The Facility was routinely inspected by Pennsylvania Department of Environmental Protection under the Bureau of Waste Management. There is no evidence or report of a release from the Facility. This site has two (2) Solid Waste Management Unit's (SWMU's). Figure two (2) shows the location of each SWMU.

SWMU 1 is the former Sludge Tank located in the central section of the building in the plating room consisting of concrete floors. The wastes stored in the sludge tank were generated in the rinsing, etching, and plating operations. The spillage in the plating rooms was piped into the settling system. Sludge consisted of copper, ferrous hydroxide and traces of nickel lead, were pumped from the wastewater treatment system to a 2600 gallon above ground tank. Flocculation and pH adjustment occur in order to treat the wastewater. There have been no

reported releases. In August 2010, PADEP visited the site and confirmed that the sludge tank was no longer operating.

SWMU 2 is the former Drum Storage Area located in the northwest portion of the building. The drum storage area is comprised of concrete floors and a secondary containment of six inch thick concrete floors and four (4) 95 gallon spillage trenches. Chemicals stored here are separated by type and six inch by six inch concrete barriers. There have been no reported releases associated with SWMU 2.

In May 1986, PADEP determined that the facility was to not a treatment, storage and disposal (TSD) facility. Currently the facility is considered a small quantity generator of metal hydroxide sludge and corrosive liquids, which is shipped offsite for disposal.

#### **IV. 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 these indicators on July 26, 2011.

#### **V. Public Participation**

Before EPA makes a final decision on its proposal for the Facility, the public may participate in the remedy selection process by reviewing this SB and documents contained in the Administrative Record (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: Catheryn Blankenbiller  
Phone: (215) 814-3464  
Fax: (215) 814-3113  
Email: Blankenbiller.Cathery@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 Catheryn Blankenbiller. EPA will hold a public meeting to discuss this proposed decision upon request. Requests for a public meeting should be made to Catheryn Blankenbiller.

EPA will respond to all relevant comments received during the comment period. If EPA determines that new information warrant 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 Catheryn Blankenbiller at the address listed above.

Date:

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Abraham Ferdas, Director  
Land and Chemicals Division  
US EPA, Region III