



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III

STATEMENT OF BASIS

FORMER SOLID STATE SCIENTIFIC, INC.
BUILDING No. 3 AREA

MONTGOMERY TOWNSHIP, PENNSYLVANIA 18936

EPA ID NO. PAD002278331

Prepared by
Corrective Action Branch No. 2
Land, Chemicals and Redevelopment Division

July 2020

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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 Saint-Gobain Abrasives, Inc. facility located at 200 Commerce Drive, Montgomery Township, Pennsylvania 18936 (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, 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 is necessary. 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 Former Solid State Scientific, Inc. Building No. 3 (Facility) is located at 200 Commerce Drive, Montgomery Township, PA and consists of 2.28 acres. The Facility is a parcel of Former Solid State Scientific, Inc. (SSSI) facility. Currently, the Former SSSI Building 3 is owned by Grampians, L.P. and occupied by Saint-Gobain Abrasives, Inc.. The subject property is located in the Montgomeryville Industrial Park, which is comprised of light manufacturing and commercial businesses. Enterprise Road borders the subject property to the northeast and Commerce Drive borders the subject property to the southeast. The nearest residential development is situated approximately one-half mile northwest of the subject property. **Figures 1 (Attachment 1) and 2 (Attachment 2)** depict a Property Location Map and a Property Features Location Map.

Section 2: Facility Background (continued)

The onsite building occupies majority of the site area. An asphalt-paved parking lot is located on the northwest end of the building with an asphalt driveway on the southwest side and grass lawn and landscape areas to the southeast and northeast sides of the building. A loading dock and the shipping and receiving areas are located at the southeast corner of the building. The balance of the Site is covered with asphalt-paved, gravel and slag covered driveway and storage area. The Site is connected to Montgomery Township public water system.

On August 11, 2015, PADEP approved an Act 2 release for the Facility (Attachment #3). The Facility attained PADEP Residential Act 2 Statewide Health Standards for soil and groundwater.

The Former SSSI Montgomeryville facility was a semiconductor manufacturing facility that produced large-scale integrated circuits. These circuits were used in watches, clocks, smoke detectors, computers, space and telecommunications, military communications, and various other uses. The circuits were produced on the surface of a silicon wafer with each wafer containing as many 800 circuits. The wafers were mass-produced using photographic techniques, high temperature heat treatments, and chemical processing.

Three properties historically associated with the former SSSI facility include the current addresses 160, 200, and 201 Commerce Drive. These addresses were the former locations of SSSI buildings #2, #3, and #1, respectively. Building #3 of SSSI was located south of Building #2 and is currently owned by Grampians, L.P. and operated by Saint-Gobain Abrasives, Inc. Building #1 of SSSI was located southeast of Buildings #2 and #3. Building #1 is now occupied by Aztec Products, Inc., a family-owned USA manufacturer of janitorial maintenance floor machines and converter of gasoline engines to LPG for other equipment manufacturers. The three properties are located in the Montgomeryville Industrial Park. Neighboring properties are mostly industrial and commercial with some residences in the general vicinity.

Buildings #2 and #3 of the former SSSI buildings processed the silicone wafers and building #1 contained the photo processing operation. The facility utilized a variety of acids, solvents, and photo-chemicals. All spent acid and low pH rinse streams were neutralized with sodium bicarbonate before being discharged to a tributary of Park Creek. Used solvents were transported to a neighboring chemical company for reclamation. Also, electroplating was part of the production process.

In August 1980, the former SSSI facility submitted a Notification of Hazardous Waste Activity for its generation and treatment/storage/disposal of hazardous waste. Hazardous wastes listed include D000, D001, D002, D003, F001, F002, F005, P010, U002, U070, U071, U072, U134, U140, U154, U188, U220, U226, U229, and U239. In 1984, the former SSSI facility changed its status to a generator only.

Statement of Basis

Section 3: Summary of Environmental History

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.

Investigations and remedial actions conducted at the facility consists of Phase I and Phase II Environmental Site Assessments (ESAs), closure of two concrete tanks, and investigations and remediations under Act 2.

The facility attained the PADEP Act 2 Residential Statewide Health Standards (SHSs) for soil and groundwater in 2015.

A. Phases I and II Environmental Site Assessments (ESAs)

Phases I and II ESAs were performed at the Facility in 2007. Phase I ESA identified six Recognized Environmental Conditions (RECs) including a former septic system, an interior hazardous waste storage area, an exterior drum storage area, two exterior concrete tanks, an electrical transformer, and an adjacent property with monitoring wells. As part of Phase II ESA, a sampling program was completed that involved the soil sampling and analysis, concrete tanks contents sampling and analysis, and installation of 4 monitoring wells and groundwater sampling and analysis.

1. Soil

On December 21, 2007, soil samples were collected and analyzed for RCRA metals, VOCs and SVOCs. Analytical results of soil samples demonstrated that barium, chromium, lead, mercury, selenium, silver, TCE, PCE, cis-1,2-DCE, ethylbenzene, vinyl chloride, and xylene were detected at concentrations below the respective EPA Region 3 residential direct contact screening levels (RSLs); arsenic was detected at concentrations as high as 23.8 mg/kg, within the EPA's allowable range of 0.77 mg/kg – 77 mg/kg for residential use in soil.

2. Groundwater

On December 21, 2007, groundwater samples and samples of liquid from the concrete UST tanks were collected. Analytical results of the groundwater samples indicated TCE and vinyl chloride were detected at concentrations as high as 18 ug/l and 2.1 ug/l, respectively, above the MCLs of 5 ug/l and 2 ug/l, respectively.

Section 3: Summary of Environmental History (continued)

Analytical results of the liquid samples indicated TCE, 1,2-cis DCE and vinyl chloride were detected at concentrations of 150 ug/l, 490 ug/l and 18 ug/l, respectively. The results of groundwater investigation indicated the concrete UST tanks are the sources of groundwater contamination.

B. Closure of two concrete underground tanks

In June 2008, Center Point Tank Service, Inc. (CPTS) excavated and removed the concrete USTs from the Facility. Impacted soil was also excavated and disposed offsite. Four post-excavation sidewall soil samples and one groundwater sample were collected. Analytical results of soil samples indicated that none of chlorinated VOCs were detected at concentrations above the PADEP SHS MSCs. Analytical results of groundwater sample indicated that TCE and vinyl chloride were detected at concentrations exceeding their respective PADEP SHS MSCs.

C. Investigations and Remediations under Act 2

1. Soil

In 2014, additional soil investigation was performed at the Facility. Soil quality approximate to the former USTs was investigated. On July 14, 2014, seven soil samples were collected and analyzed for VOCs. Analytical results of the soil samples indicated that VOCs were either NDs or detected at concentrations below the respective EPA residential direct contact screening levels (RSLs).

2. Groundwater

In April 2014, a groundwater monitoring event was conducted at the Facility to assess groundwater quality since the last groundwater monitoring event in 2008. On July 18, 2014, additional 3 groundwater monitoring wells (MW-5, MW-6, and DW-1) were installed at the Facility. Shallow monitoring wells MW-5 and MW-6 were installed downgradient of the source at the southern corner of the property. Deeper monitoring well DW-1 was installed immediate adjacent to MW-4.

Four additional quarterly groundwater monitoring events were conducted in July 2014, October 2014, January 2015, and April 2015. Analytical results of the groundwater samples indicated that VOCs, specifically TCE and VC, were detected at concentrations below the respective MCLs.

The December 21, 2007 and July 14, 2014 soil sampling results demonstrated

Section 3: Summary of Environmental History (continued)

that the Facility met the EPA's residential standards for soil. EPA has concluded that no action is required.

The groundwater analytical results demonstrated that VOCs has attenuated naturally and groundwater quality at the Facility met the MCLs, residential standards for groundwater. EPA has concluded that no action is required.

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 Facility met both of these indicators on July 31, 2018.

Section 5: Proposed Remedy

EPA has evaluated the facility and has determined that the Facility met the EPA's residential standards for soil and groundwater. Therefore, EPA proposes no further action is necessary for the Facility.

Section 6: 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 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: Ms. Tran Tran
Phone: (215) 814-2079
Fax: (215) 814-3113
Email: tran.tran@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 Statement of Basis

mail, fax, or e-mail to Ms. Tran Tran. EPA will hold a public meeting to discuss this proposed decision upon request. Requests for a public meeting should be made to Ms. Tran Tran.

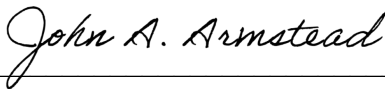
EPA will respond to all relevant comments received during the comment period. If EPA determines that new information warrants a modification to the proposed decision, EPA will modify the proposed decision or select other alternatives based on such new information and/or public comments. EPA will announce 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 Ms. Tran Tran at the address listed above.

Attachment #1: Figure 1 – Property Location Map

Attachment #2: Figure 2 – Property Features Location Map.

Attachment #3: PADEP Act 2 Final Report Approval Letter

Date: 7/14/20



John A. Armstead, Director
Land, Chemicals and Redevelopment Division
US EPA, Region III

Index to Administrative Record

1. Act 2 Final Report, Saint-Gobain Abrasive, Inc. Facility, July 2015
2. Final Environmental Indicator Inspection Report, November 2002

ATTACHMENT 1

Property Location Map

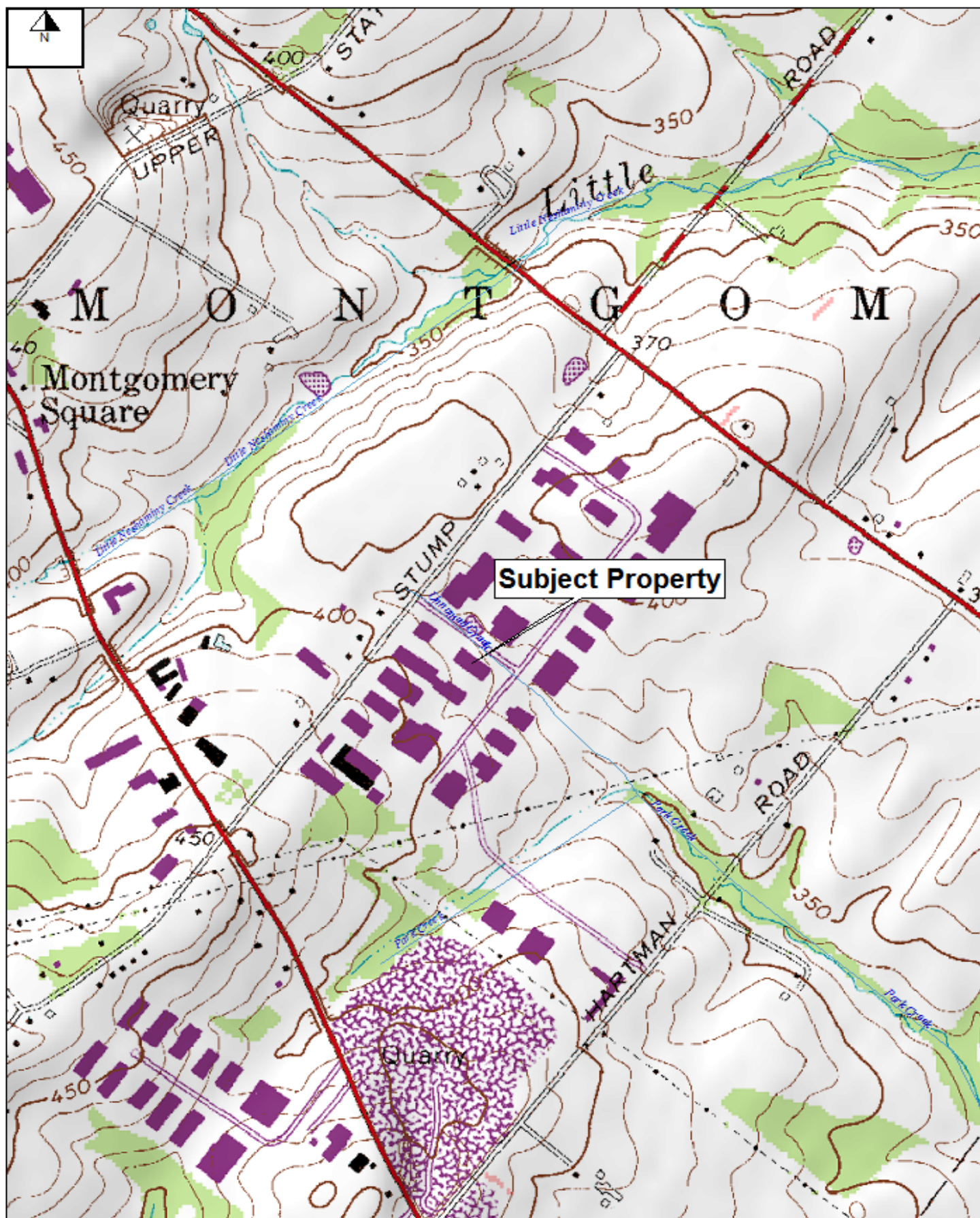


Figure 1
Subject Property Location Map

Saint-Gobain Abrasives, Inc. Facility
 200 Commerce Drive

Montgomery Township, Montgomery County, Pennsylvania

Prepared By: JEK
 Reviewed By: AKM
 Job No. 10.14.1379
 Date: 5/12/14
 Scale: 1" = 1,066 ft.



Patriot
 Environmental Management, LLC

ATTACHMENT 2

Property Features Location Map



LEGEND

MW-1



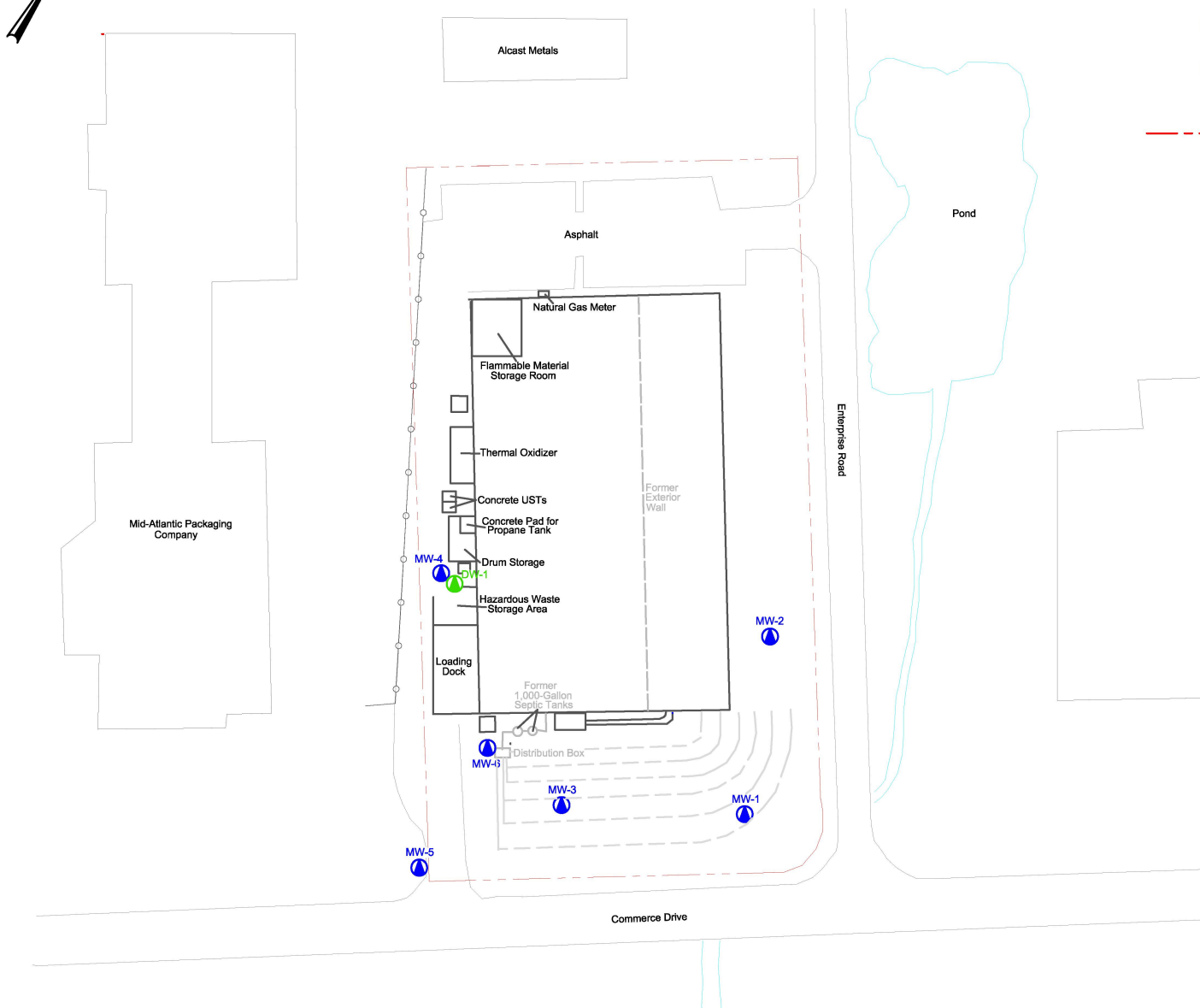
- Shallow Monitoring Well Location

DW-1



- Deeper Monitoring Well Location

----- - Approximate Property Boundary



Approximate Scale



Property Features Location Map

Saint-Gobain Abrasives, Inc. Facility
200 Commerce Drive
Montgomery Township, Montgomery County, Pennsylvania

MTI Holding Group, Inc.

f/k/a Moyco Technologies, Inc.
500 Office Center Drive Suite 400
Fort Washington, Pennsylvania 19034

Prepared By:



Review
AKM

Draftsman
JEW

Job No.
10.14.1379

Date:
05/13/15

FIGURE 2

ATTACHMENT 3

PADEP Act 2 Final Report Approval Letter

August 11, 2015

Mr. Joseph Sternberg
MTI Holding Group, Inc.
500 Office Center Drive, Suite 400
Fort Washington, PA 19034

Re: Statewide Health Standard Final Report Approval
Saint-Gobain Abrasives Facility
eFACTS PF No. 777126
200 Commerce Drive
Montgomeryville, Montgomery Township
Montgomery County

Dear Mr. Sternberg:

The Department of Environmental Protection (DEP) reviewed the document titled "Act 2 Final Report" (report), for the property located at 200 Commerce Drive, Montgomery Township, PA. The report was prepared by Patriot Environmental Management, LLC, and submitted to DEP in accordance with the Land Recycling and Environmental Remediation Standards Act (Act 2) and constitutes a Final Report as defined in Chapter 3 of Act 2.

DEP hereby approves this Final Report for the substances identified and remediated to an Act 2 standard within the site specified. Chapter 5, Section 501 of Act 2, provides the liability protection where attainment of Act 2 cleanup standards is demonstrated. The cleanup liability protection provided by this chapter applies to the current and future owner or any other person who participated in the remediation; a person who develops or occupies the property; successor or assign of any person to whom liability protection applies; and a public utility to the extent the public utility performs activities on the identified property.

This project attained a residential Statewide Health Standard for soil and groundwater.

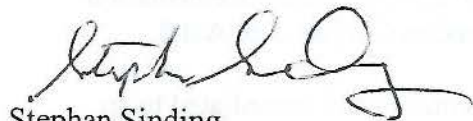
Thank you for your cooperation in working with DEP in the remediation of this site. If you have any questions or need further information regarding this matter, please contact Mr. John M. Zatyczyc, P.G., at 484.250.5793.

Any person aggrieved by this action may appeal, pursuant to Section 4 of the Environmental Hearing Board Act, 35 P.S. Section 7514, and the Administrative Agency Law, 2 Pa. C.S. Chapter 5A, to the Environmental Hearing Board, Second Floor, Rachel Carson State Office Building, 400 Market Street, P.O. Box 8457, Harrisburg, PA 17105-8457, 717.787.3483. TDD users may contact the Board through the Pennsylvania Relay Service, 800.654.5984. Appeals must be filed with the Environmental Hearing Board within 30 days of receipt of written notice of this action unless the appropriate statute provides a different time period. Copies of the appeal form and the Board's rules of practice and procedure may be obtained from the Board. The appeal form and the Board's rules of practice and procedure are also available in braille or on audiotape from the Secretary to the Board at 717.787.3483. This paragraph does not, in and of itself, create any right of appeal beyond that permitted by applicable statutes and decisional law.

If you want to challenge this action, your appeal must reach the board within 30 days. You do not need a lawyer to file an appeal with the board.

Important legal rights are at stake, however, so you should show this document to a lawyer at once. If you cannot afford a lawyer, you may qualify for free pro bono representation. Call the secretary to the board (717.787.3483) for more information.

Sincerely,



Stephan Sinding
Regional Manager
Environmental Cleanup and Brownfields

cc: Mr. Green - Patriot Environmental Management
Ms. Warren
Ms. Bass
Mr. Payne, P.G.
Mr. Zatyczyc, P.G.
Montgomery Township
Montgomery County Health Department
Montgomery County Conservation District
Re 30 (eh15ecb)223-2