



UNITED STATES

ENVIRONMENTAL PROTECTION AGENCY

REGION III

STATEMENT OF BASIS

BULOVA TECHNOLOGIES LLC

LANCASTER, PENNSYLVANIA

EPA ID NO. PAD 000800680

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I. Introduction

A. Facility Name

The United States Environmental Protection Agency (EPA) has prepared this Statement of Basis (SB) for the Bulova Technologies LLC facility located at 101 North Queen Street, Lancaster, PA 17604 (hereinafter referred to as the Facility).

The Facility is subject to the 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. Sections 6901 to 6992k. 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.

Information on the Corrective Action program as well as a fact sheet for the Facility can be found by navigating <http://www.epa.gov/reg3wcmd/correctiveaction.htm>.

B. Proposed Decision

This SB explains EPA's proposed decision that Corrective Action is complete and no land use controls are required for the Facility. EPA's proposed decision is based on a review of EPA and Pennsylvania Department of Environmental Protection (PADEP) files regarding the environmental history of the Facility as presented in the Final Environmental Indicator Inspection Report submitted in August 2009. Based on this review, EPA has concluded that there are no current or unaddressed releases of hazardous waste or hazardous constituents from the Facility.

C. Importance of Public Input

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 the complete set of reports that document Facility conditions, including a map of the Facility, in support of EPA's proposed decision. EPA encourages anyone interested to review the AR. The AR is available for public review at the EPA Region III office, the address of which is provided in Section V, below.

EPA will address all significant comments received during the public comment period. If EPA determines that new information or public comments 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 approve its final decision in a document entitled the Final Decision and Response to Comments (FDRTC).

II. Facility Background

The Facility is located at 101 North Queen Street in Lancaster, Lancaster County, Pennsylvania. The Facility consists of a four-story brick building, approximately 210,000 square feet in size, with no outside property. The Facility is bordered by commercial businesses on all sides. Land use in the vicinity of the Facility is urban/commercial with intermixed businesses and residences.

The building was constructed and used in the early 1970s by a Hess' Department Store. In September 1980, the Hamilton Division of HMW Industries (Hamilton) purchased the Facility, which had been previously vacated by Hess' Department Store, and used it to design and manufacture arming devices under a government contract. After renovating the former department store for industrial usage in 1980, each floor consisted of assembly lines and individual work areas. The first floor was comprised of finishing and machining areas, a laboratory, tool shop, filter press, and solvent, waste solvent and sludge storage areas. Degreasers were located on the third and fourth floors. A permit-by-rule wastewater treatment system was located in the basement of the building. Offices, secretarial and clerical areas were located on the second floor.

Bulova began operations at the property in 1991, manufacturing military detonators, safety equipment, commercial computer chips and circuit boards. In December 2001, Bulova sold the defense products portion of its business to the BT Fuze Products Division (BT Fuze) of the L-3 Communications Corporation. BT Fuze leased a portion of the Facility from Bulova and conducted operations at this location until its operations were moved out of state in early 2007. Bulova continued to assemble printed wiring boards and operated as a Conditionally Exempt Small Quantity Generator until it also closed down its operations in Lancaster, PA in November 2008. The building has remained vacant since that time.

III. Summary of Environmental History

The facility had a 2,000-gallon underground storage tank (UST) used to store No. 2 fuel oil, which was removed from service in 1982. The UST was originally installed to supply fuel to the building's trash incinerator. Bulova submitted a UST Closure Report to PADEP in June 1995 and received approval for the closure in September 1995.

A Phase I Environmental Site Assessment completed in 2001 included both a passive soil vapor survey and discrete soil sampling. Several volatile organic compounds (VOCs) including trichloroethylene (TCE), tetrachloroethylene (PCE), 1,1,1-trichloroethane (1,1,1-TCA) and BTEX-related compounds were detected by the passive soil vapor survey, but TCE was the only VOC confirmed to be in the soils beneath the building. TCE was found in only one soil sample at a concentration of 19 ug/kg, which is more than two orders of magnitude less than the EPA Region 3 risk based concentration for residential soil for TCE (2,800 ug/kg). Two subsurface soil samples exhibiting low concentrations of total petroleum hydrocarbons-diesel range organics (TPH-DRO) were also collected as part of the Phase I Site Assessment. A soil sample taken from two feet below the sidewalk surface directly under the outside fill port of the former fuel oil UST system exhibited a TPH-DRO concentration of 610 mg/kg, which is slightly above the PADEP action level of 500 mg/kg. A second composite soil sample taken between 3 and 6 feet at the same location returned a TPH-DRO concentration of 27 mg/kg, confirming that only a very limited amount of soil had been impacted. Based on the above results, no further soil sampling or remediation is warranted.

On February 5, 2007, BT Fuze notified PADEP that it ceased operation of its permit-by-rule elementary neutralization and wastewater treatment system because manufacturing. A closure report certified that the treatment system components contacting hazardous wastes had been emptied and cleaned to the extent practical per the closure requirements for wastewater treatment units found at 40 CFR 265.404. Because this was a permit-by-rule system, the certification was not required by PADEP, but was submitted by BT Fuze to document closure activities for the State.

After Bulova vacated the Lancaster site in November 2008, all of the remaining equipment and anything else that was salvageable from inside the building was auctioned off, moved to other Bulova Technologies locations, or disposed of. The building space is currently vacant and ready for immediate use by a new tenant.

IV. Evaluation of EPA's Proposed Decision

EPA has determined that its proposed decision for the Facility is protective of human health and the environment and that no further corrective action or controls are necessary at this time.

V. Public Participation

Interested persons are invited to 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. Comments may be submitted by mail, fax, e-mail, or phone to Mr. Andrew Clibanoff at the address listed below.

A public meeting will be held upon request. Requests for a public meeting should be made to Mr. Andrew Clibanoff at the address listed below. A meeting will not be scheduled unless one is requested.

The Administrative Record contains all the information considered by EPA for the proposed decision at this Facility. The Administrative Record is available at the following location:

U.S. EPA Region III
1650 Arch Street
Philadelphia, PA 19103
Contact: Mr. Andrew Clibanoff (3LC30)
Phone: (215) 814-3391
Fax: (215) 814 - 3113
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