



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III
STATEMENT OF BASIS
CARLISLE SYNTEC, INCORPORATED
EPA ID # PAD 069 784 049

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ACRONYMS

AOC	Area of Concern
AR	Administrative Record
BTEX	Benzene, Toluene, Ethylbenzene, Xylene
CFR	Code of Federal Regulations
CSI	Carlisle SynTec, Incorporated
EI	Environmental Indicator
EPA	Environmental Protection Agency
HSWA	Hazardous and Solid Waste Amendments of 1984
MTBE	Methyl tert-butyl ether
PADEP/R	the Pennsylvania Department of Environmental Protection/Resources
ppm	parts per million
RCRA	Resource Conservation and Recovery Act
SB	Statement of Basis
SWMU	Solid Waste Management Unit
USACE	United States Army Corps of Engineers
U.S.C.	United States Code
UST	Underground Storage Tank

I. Introduction

A. Facility Name and Location

The site is the location of the manufacturing and warehousing facilities for Carlisle SynTec, Inc. (hereinafter referred to as “CSI” or the “Facility”), located at 1285 Ritner Highway in Carlisle, Cumberland County, Pennsylvania. 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 facilities have investigated and cleaned up any releases of hazardous waste and hazardous constituents that have occurred at their property.

B. Purpose of Document/Proposed Remedy

The United States Environmental Protection Agency (“EPA”) has prepared this Statement of Basis (“SB”) to describe investigation results and remedial actions performed at the Facility and to propose the Agency’s final remedy decision. This SB is based on a review of past and present environmental practices, soil and groundwater sampling activities, historical investigations, and remedial activities presented in the Environmental Indicator Inspection Report submitted in May 2002. Additionally, several reports regarding local facilities and properties were researched to understand the environmental setting of the area. After review, EPA has concluded that all Solid Waste Management Units (“SWMUs”) and Areas of Concern (AOCs) at the Facility have been satisfactorily delineated and no further investigation or corrective action is required at the Facility at this time. Consistent with EPA’s February 2003 document, Final Guidance on Completion of Corrective Action Activities at RCRA Facilities (reference 68 FR 8757), EPA is making a determination of *“Corrective Action Complete without Controls.”* The guidance recommends that EPA make this determination when the objectives have been met and the areas subject to the determination do not require any additional action or measures to ensure the remedy remains protective of human health and the environment. The purpose of this document is to provide a detailed account of environmental activity for interested parties to review and subsequently provide input to EPA prior to making its final remedy decision.

In the Commonwealth of Pennsylvania, EPA has delegated most of the RCRA permitting program to the Pennsylvania Department of Environmental Protection (“PADEP”) based upon promulgated State regulations which are equivalent to, or more stringent than, the federal requirements. EPA has not yet delegated the RCRA corrective action requirements, under which this SB has been prepared, to PADEP. In Pennsylvania, EPA administers the RCRA Corrective Action program with authority to require environmental investigations and remedial actions at any Facility that applies for a hazardous waste operating permit or otherwise operated under RCRA interim status.

C. Importance of Public Input

To gain a more comprehensive understanding of the RCRA activities that have been

conducted at the Facility, EPA encourages the public to review the decision making documents which are found in the Administrative Record (“AR”). The Administrative Record is available at the following location:

U.S. EPA Region III
1650 Arch Street
Philadelphia, PA 19103

Further information can also be obtained by contacting the EPA Project Manager:

Mr. Kevin Bilash (3WC22)
Phone: (215) 814-2796
Fax: (215) 814-3113
Email: bilash.kevin@epa.gov

EPA will address all significant comments submitted in response to the proposed remedy. EPA will make a final remedy decision and issue a Final Decision and Response to Comments after information submitted during the public comment period has been considered. If EPA determines that new information or public comments warrant a modification to the proposed remedy, EPA may modify the proposed remedy or select other alternatives based on such new information and/or public comments. Therefore, the public is encouraged to review and comment on the remedy described in this document and/or any additional options not previously identified and/or studied. The public may participate in the remedy selection process by reviewing the SB and documents contained in the AR and submitting written comments to EPA during the public comment period. Public participation is discussed in more detail in Section IV.

II. Facility Background

A. Site Use History

CSI consists of approximately 90 acres located at 1285 Ritner Highway in Carlisle, Cumberland County, Pennsylvania. CSI and its sister company Carlisle Tire & Rubber (CT&R) have used the site for manufacturing and warehousing of rubber products since 1969. Site use prior to 1969 is not known but was mentioned by a Facility representative as probably agricultural.

Plant No. 4, the CSI Rubber Manufacturing Facility, produces rolls of rubber roofing membranes. Raw production materials are mixed to form synthetic rubber which is pressed into thin sheets, vulcanized, and rolled. Plant No. 4 was built in 1969 and expanded in 1972, 1974, and 1980. Hazardous wastes generated include waste solvents and solvent-based adhesives.

Plant No. 6, the CSI Adhesives Facility, was built in 1983 to manufacture solvent based adhesives for rubber roofing applications. Raw materials such as solvents, pigments, and polymers are mixed in batch tanks and packaged. The hazardous wastes resulting from these operations include waste solvents, polymers, and adhesives. Additionally, waste Tetrachloroethene used in cleaning operations is occasionally generated, along with waste paints.

CT&R Plant No. 5, a warehouse for rubber products, was built after 1969. No manufacturing occurs at CT&R Plant No. 5. The CSI Technical Center, used for engineering support, was opened in 1984.

B. Environmental Investigations

In 1989, the NUS Corporation performed a Preliminary Assessment at the Facility. They identified six SWMUs: the adhesives facility hazardous waste storage area, the adhesives facility warehouse, the adhesives facility empty drum storage area, the rubber-mixing area, the Plant No. 4 hazardous waste storage trailer, and the Plant No. 4 non-hazardous waste drum storage area. The report concluded that no remedial action is known to have occurred at the site and no spills or releases are known to have occurred at the Facility. More notably, the report briefly mentions volatile organic compound (VOC) contamination of local groundwater of an unknown source.

In 1993, an Emergency Spill Response report described a 90 Solvent (primarily naphtha) release. This was an aboveground pipeline leak discovered on April 20, 1993. The report was located by PADEP during a file review and forwarded to EPA in November 2005.

The Environmental Indicator (“EI”) Inspection Report for the Facility was prepared and submitted by the United States Army Corps of Engineers (“USACE”) in May, 2002. The report was derived from a comprehensive record search and review at the PADEP Harrisburg Regional Office. The EPA Region III conducted a review of their files, and pertinent information was provided for this report. The report lists the six SWMUs identified in the NUS report discussed below. Additionally, it lists several AOCs including, most importantly, the removal and/or abandonment of all underground storage tanks (“USTs”) and a Plant No. 4 #6 fuel oil spill.

Based on the evidence in the NUS report that mentioned VOC contamination of local groundwater, several reports regarding local facilities and properties were researched to understand the environmental setting of the area. Based on a file review of the Facility, the reports and/or information that were found that include information on this area-wide contamination are:

- *Meeting House Inn, North Middleton Township, Cumberland County Investigation*-letters that were sent to the residents along with sample results November 5-7, 1986
- *Underground Storage Tank Closure Report, Carlisle Petroleum Inc.*, April 7, 1994
- *Subsurface Environmental Investigation Final Report, Lippert Family Tract* March 13, 1997
- *Final Report, Demonstration of Attainment of Background, Area-Wide Standard for Groundwater, Royer Tract Site* April 30, 1999
- *Final Report-Demonstration of Attainment Under Act 2, former GS Electric Facility* December 2004

C. Summary of Investigations and Interim Actions

The EI Inspection Report notes that the Facility has either abandoned in-place or removed all USTs at the site in accordance with applicable PADEP programs.

An Underground Storage Tank Closure Report from October 1995 is included as Attachment 6 of the EI Report. It describes the removal of two non-regulated USTs, a 15,000 gallon mineral oil tank and 300 gallon wastewater tank, on August 17, 1995. The wastewater tank collected water generated from the washing of forklift trucks prior to repair work. During removal, no pits or corrosion were observed indicating that these USTs were in good condition. All analytical results from the soils around the tanks were below PADEP limits for petroleum and EPA proposes that no further corrective action is necessary.

Attachment 5 of the EI report is a letter to PADEP dated September 5, 1990 discussing the closing of 2 USTs; a 30,000 gallon #6 fuel oil tank and a 2,000 gallon waste oil tank. No evidence of structural failure was noted during removal. Analytical results from soils sampled were below PADEP limits for petroleum and EPA proposes that no further corrective action is necessary.

Attachment 5 also includes information regarding three 15,000 gallon USTs, formerly used to store process oil, that were removed from the subsurface at an unknown date. The tanks were removed and contaminated soils were stockpiled and sampled. The Total Petroleum Hydrocarbon (TPH) analysis showed elevated levels above PADEP's limit of 100 parts per million (ppm). However, the analytical results for individual hazardous constituents (Benzene, Toluene, Ethylbenzene, and Xylene (BTEX)) were all below EPA's screening level for residential soil. Additionally, the Material Safety Data Sheets describe the products as not being a threat to health. In a discussion with representative of the PADEP UST Program, it was agreed to that due to the age of the release, the type of oil, and the analytical results that no corrective action is necessary in this area at this time. Therefore, EPA considers this area, at this time, to need no further corrective action.

On December 18, 1992, a 1000 gallon #6 fuel oil tank located in Plant No. 4 overflowed due to failure of an automatic valve. 50 to 100 gallons of fuel oil were released and entered a nearby floor drain, which connected to the stormwater drainage system. CSI thought they cleaned up all of the free product, however, after a heavy rain, contamination was detected in the stormwater drainage system. Remediation consisted of plugging or diking vulnerable floor drains and removing soil at the stormwater discharge point at the rear of the plant. After two rounds of soil excavation, confirmatory sampling showed TPH levels of less than 5.8 ppm, well below the PADEP guidelines. EPA considers this area to need no further corrective action.

On April 20, 1993 an aboveground 90 Solvent pipeline leak was discovered. During the course of remedial activities, it was discovered that the 90 Solvent came in contact with the groundwater. A groundwater monitoring point was installed in one of three soil borings. At the time, there was no reportable quantity for naphtha, but a conversation between PADER and GemChem resulted in PADER agreeing that the established limit for TPH could be used to show acceptable remediation. Furthermore, the analytical results for BTEX were below EPA's RBC for residential soil and groundwater. The monitoring point was to be sampled quarterly for six months to confirm there was no impact. There is no documentation in the files to show that this additional sampling was done. However, a Complaint Detail Report from PADEP dated 1/10/1994 noted this spill as a non-violation and mentioned that it was covered during a Hazardous Waste Inspection and the complaint file was closed.

During the site visit on June 19, 2007 a PVC tube was observed protruding from the ground. CSI was not aware of its purpose and it was assumed this was the monitoring point in question. CSI agreed to take a sample and barring the results to proceed with abandoning the point. During the attempt to sample, it was found that there was no water in the well. Considering the 1993 analytical results and PADEP's Complaint Report, EPA believes that there is no need for further corrective action in this area. The monitoring point will be closed according to PADEP well abandonment procedures.

There were six identified SWMUs on the CSI property according to the 1989 NUS Corporation Preliminary Assessment. No remedial action is known to have occurred at the site and no spills or releases are known to have occurred at the Facility. Therefore, there is no evidence to suggest a need for corrective action and EPA believes there is no need for corrective action in any of these areas.

The VOC contamination of local groundwater from an unknown source is mentioned in the 1989 NUS Corporation Preliminary Assessment. To gain a better understanding of this and determine if CSI was contributing to this area-wide concern, EPA researched the reports regarding local facilities and properties listed in Section IIB. The map of the Area of Concern in the NUS Report and the 1986 letters to the residents of the *Meeting House Inn* Project indicate a large area (>1 mi²) of contaminated groundwater. The compounds consist of the organic chemicals 1,1,1-Trichloroethane; Trichloroethene; Tetrachloroethene; 1,1-Dichloroethene; Benzene; Toluene; Ethylbenzene; Toluene; Methyl tert-butly-ether (MTBE); Methylene chloride; Chloroform; 1,1-Dichloroethane; and 1,2-Dichloroethene. The UST Report for Carlisle Petroleum Inc. indicates contamination related to earlier tanks. PADEP issued a letter requesting that the extent of this contamination be determined but no response was located. A conversation with the project manager verified that this was the last correspondence. The EPA believes this is the cause of the MTBE and BTEX contamination downgradient of the Facility.

The remaining reports in Section IIB consider the groundwater contamination upgradient and sidegradient to the Facility. The reports are all demonstrations, at a minimum, of attaining the background standard according to PADEP's Land Recycling and Environmental Remediation Standards Act. All three reports indicated the most probable source was located near the Carlisle Livestock Market, located approximately 1 mile from CSI. These reports were approved by PADEP. EPA believes that the weight of evidence suggests that Carlisle SynTec is not contributing to this area-wide contamination and, at this time, there is no need for corrective action at Carlisle Syntec's site. If new evidence is presented that disproves this, appropriate corrective action measures by Carlisle SynTec will need to be taken.

III. Environmental Issue

A. Description of Contaminated Media

As was discussed in the previous section, the only known contaminated media is the groundwater beneath and surrounding the facility. EPA does not believe that Carlisle SynTec is contributing to this area-wide contamination. However, it is important to include this information to portray to the public an accurate depiction of the surrounding area. The contamination is believed to cover a large area (>1 mi²) of groundwater from a source upgradient

of the Carlisle property. Refer to Attachment 1 for a map of what is roughly believed to be the extent of the contamination.

B. Facility Risks

The only conceivable risk at the facility would be in the instance of drilling a well for purposes other than restricted by the Borough of Carlisle, as described next. To this effect, EPA is requesting that Carlisle SynTec inform the EPA prior to any potential well drilling activities to assure that an appropriate health and safety plan exists.

There is no public drinking water exposure risk from the groundwater beneath and surrounding the site. The reason is that area residents are supplied with public water. This is governed by the Code of the Borough of Carlisle § 251-8 [Mandatory connection and application] (approved 3-14-1985) which says “No structure or building which is equipped with plumbing fixtures and utilized for human occupancy or habitation shall be connected to a private well. There is excluded from this prohibition any structure or building so equipped, which building or structure is both existing and serviced by a private well upon the effective date of this section, and all lot lines of the tract upon which such structure or building is erected are more than 300 feet from the nearest public water supply system. The following are exempt from this mandatory connection requirement under the specified circumstances: Owners may have their own supply of water for uses other than human consumption or agricultural purposes, such as geothermal systems, lawn watering and car washing.”

IV. Evaluation of EPA’s Proposed Remedy Selection

The remedy proposed in this SB best meets the four threshold criteria (overall protection, attainment of media cleanup objectives, source control, and compliance with waste management standards) for corrective measures and the five remedy selection decision factors or balancing criteria (long-term reliability and effectiveness; reduction in toxicity, mobility or volume; short term effectiveness; Implementability; and cost).¹ The following discussion outlines EPA's determination for the remedy proposed at the Facility.

A. Overall Protection - This overarching standard requires remedies to include those measures that are needed to be protective, but are not directly related to other factors. The proposed determination of "Corrective Action Complete without Controls" meets this standard. This is based upon the fact that the Facility has remediated any known releases and analyzed or removed any known threat of a release to the environment.

B. Attainment of Media Cleanup Standards - Any spills or releases that have occurred at the Facility have been remediated to applicable cleanup standards, whether the media

¹ The criteria used to analyze the proposed remedy are set forth in OSWER guidance document, [Guidance on RCRA Corrective Action Decision Documents Directive](#) [Number 9902.6](#), February 1991, and the May 1, 1996 ANPR.

was soil or groundwater. This criterion is satisfied for the conditions that exist at the Facility.

C. Controlling Source of Releases - There are no known or expected sources to exist at the Carlisle Facility and, therefore, this criterion is satisfied for the conditions that exist at the Facility.

D. Complying with Standards for Management of Waste - The proposed determination of "Corrective Action Complete without Controls" is based upon site visits and information regarding the management of wastes at the Facility. Based upon this information, Carlisle is in compliance with all applicable standards.

E. Long-Term Reliability and Effectiveness - The long-term reliability and effectiveness standard is intended to address protection of human health and the environment over the long term. Source removal and control approaches that remove and/or consolidate remediation wastes in engineered structures or systems that protect against future releases are more reliable and therefore preferred over those that offer more temporary or less reliable controls. Any contamination or source was removed as discussed above and long-term reliability is no longer a factor for the consideration of this Statement of Basis.

F. Reduction of Toxicity, Mobility or Volume of Waste - Reduction of toxicity, mobility, or volume is directly related to the concept of long-term remedies. For this criterion, remedies that employ treatment and/or source removal and containment that are capable of permanently reducing the overall risk posed by the remediation wastes are preferred. The source removal and source controls integral to the proposed corrective measures allow the remedy to meet this criterion because they reduce the mobility and areal extent of contaminated media. Any contamination or source was removed as discussed above and reduction of toxicity, mobility, and volume is no longer a factor for the consideration of this Statement of Basis.

G. Short-Term Effectiveness - The short-term effectiveness standard is intended to address hazards posed during the implementation of corrective measures. Short-term effectiveness is designed to take into consideration the impact to site workers and nearby residents during construction. Examples of hazards addressed by this standard include the potential for volatilization of organic contaminants, the spread of contamination through dust generation, and hazardous materials spills resulting from waste loading and transport operations. Since corrective measures of known releases/spills have been completed at the Facility, short-term hazards no longer exist.

H. Implementability - The Implementability decision factor addresses the regulatory constraints in employing the cleanup approach. Since there is no further cleanup necessary at the Facility, Implementability is not a factor in the consideration of this Statement of Basis.

I. Cost - EPA's overriding mandate under RCRA is protection of human health and the environment. However, EPA believes that relative cost is a relevant and appropriate consideration when selecting among alternatives that achieve the cleanup requirements. EPA has stated its belief that it is appropriate to allow cost to be one of the factors influencing the decision for selecting among the alternatives. The proposed determination of "Corrective Action Complete without Controls" satisfies this criterion for the conditions that exist at the Facility.

V. Public Participation

EPA is requesting comments from the public on its proposal that Corrective Action Complete without Controls will be required at Carlisle SynTec, Incorporated at this time. The public comment period will last forty-five (45) calendar days from the date that this Statement of Basis is published in a local newspaper. Comments should be submitted to EPA by mail, fax, e-mail, or phone to the addresses listed below.

A public hearing will be held upon request. Requests for a public hearing should be made to Mr. Kevin Bilash at the EPA Regional Office. A hearing will not be scheduled unless one is requested.

The Administrative Record contains all information considered by EPA when making this proposal to require Corrective Action Complete without Controls at the Facility.

The Administrative Record is available at the following location:

U.S. EPA Region III
1650 Arch Street
Philadelphia, PA 19103
Contact: Mr. Kevin Bilash (3WC22)
Phone: (215) 814-2796
Fax: (215) 814 - 3113
Email: bilash.kevin@epa.gov

After evaluation of the public's comments, EPA will prepare a Final Decision and Response to Comments that identifies the final selected remedy. The Response to Comments will address all significant written comments and any significant oral comments generated at the public meeting, if requested. This Final Decision and Response to Comments document will be made available to the public. If, on the basis of such comments or other relevant information, significant changes are proposed to be made to the corrective measures identified by EPA in this Statement of Basis, EPA may seek additional public comments. The final remedy will be implemented using available legal authorities possibly including, but not necessarily limited to, RCRA Section 3013, 42 U.S.C. 6974.