

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III
STATEMENT OF BASIS
DELBAR PRODUCTS INCORPORATED
PERKASIE, PA 18944
EPA ID # PAD 002 378 149

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I. Introduction

The United States Environmental Protection Agency (EPA) has prepared this Statement of Basis (SB) to propose a Corrective Action Complete With Controls determination as the final remedy for the facility owned by Delbar Products Incorporated and located at 601 West Spruce Street, Perkasio, Pennsylvania (the Facility). EPA is proposing a Corrective Action Complete with Controls determination because it believes that no further actions to remediate soil, groundwater or indoor air contamination are necessary given current land use. In addition, to ensure that protection of human health is maintained, EPA's proposed remedy includes the implementation of institutional controls.

This SB summarizes information that can be found in greater detail in the workplans and reports submitted by the Facility to EPA and PADEP. To gain a more comprehensive understanding of the RCRA activities that have been conducted at the Facility, EPA encourages the public to review these documents, which are found in the Administrative Record. The Administrative Record is located at the EPA Region III Office. The SB, Index for the Administrative Record, and Administrative Record are available for review at the Bucks County Free Library Samuel Pierce Branch located as follows:

Bucks County Free Library
Samuel Pierce Branch
491 Arthur Avenue, Perkasio, PA 18944
Phone: (215) 257-9718
Hours: Monday & Wednesday: 10:00 am - 9:00 pm
Tuesday, Thursday & Saturday: 10:00 am - 5:00 pm
Friday: 1:00 pm - 5:00 pm
Sunday: Closed
Manager: Beth Anderson

While EPA is proposing a Corrective Action Complete With Controls determination for the Facility, it has not made a final decision. The public is encouraged to participate in the remedy selection process by reviewing this SB and documents contained in the Administrative Record and submitting written comments to EPA during the public comment period. Public participation is discussed in more detail in Section VIII, below. After EPA has considered all information submitted during the public comment period, EPA will make a final remedy decision and address all significant comments submitted during the public comment period in a Final Decision and Response to Comments. If EPA determines that new information or public comments warrant a modification to its proposed decision, EPA will modify the proposal or select other remedial alternatives based on such new information and/or public comments.

II. Facility Background

The Facility is owned and operated by Delbar Products Incorporated (Delbar). It consists of approximately three acres and is located in an industrial/commercial area of Perkasio, Pennsylvania. Delbar has manufactured automotive mirrors at the Facility since approximately 1948. Its manufacturing processes involve stamping, pressing, and painting metal tubes and sheets to produce mirror mounts. As part of its painting process, Delbar used volatile organic compounds (VOCs), including trichloroethylene (TCE). Delbar no longer operates the painting and degreasing processes at the Facility.

In 2000, EPA became aware of TCE-contaminated groundwater beneath the Facility. In 2001, EPA and Delbar entered into Administrative Order on Consent (Order), U.S. EPA Docket Number RCRA-03-2001-0351, under Section 7003 of the Resource Conservation and Recovery Act of 1976, as amended, (RCRA), 42 U.S.C. Section 6973. The AOC, among other things, required Delbar to complete a RCRA Facility Investigation (RFI) to determine fully the nature and extent of any release of solid wastes, hazardous wastes and/or hazardous constituents at or from the Facility. The EPA-approved RFI determined that the source of the TCE-contaminated groundwater under the Facility comes from an upgradient source. The RFI concluded that the Facility is not an ongoing source of TCE contamination to the groundwater and included a Justification for No Further Action under the Order. EPA continues to investigate the potential sources of the TCE contaminated groundwater in the vicinity of the Facility.

III. Summary of RCRA Facility Investigation (RFI)

On April 26, 2004, EPA approved Delbar's RFI workplan. As required by the Order, Delbar performed the RFI in accordance with the approved RFI workplan. On November 14, 2005, EPA approved Delbar's RFI Report.

The following summarizes the findings of the RFI:

A. Groundwater

In accordance with the approved RFI workplan, Delbar analyzed groundwater samples for metals and VOCs. The RFI Report describes groundwater samples as either shallow groundwater or bedrock groundwater. For this site, shallow groundwater means groundwater in unconsolidated material which lies above the bedrock. Bedrock groundwater means groundwater which resides in fractures and other pore spaces in the bedrock itself.

Concentrations of metals, including arsenic, barium, cadmium, chromium, and lead, were detected in both shallow and bedrock groundwater samples at levels below their respective Maximum Contaminant Levels (MCLs) established by the Safe Drinking Water Act, 42 U.S.C. Section 300g-1, and their respective Pennsylvania media-specific concentrations (MSCs) under

the Pennsylvania Land Recycling and Environmental Remediation Standards Act (Act 2), 35 P.S. Sections 6026.101 *et seq.*

VOCs were detected in both shallow and bedrock groundwater across the Facility. Concentrations of VOCs found in the shallow groundwater were below their respective MCLs, EPA Region III Tap Water Risk Based Concentrations (RBCs) and PADEP's used aquifer MSCs. Of the VOCs detected in bedrock groundwater, PCE and TCE were detected at concentrations above their respective MCLs. The RFI which assessed groundwater flow direction, chemical signature analysis and the relative VOC concentrations, among other things, demonstrates that the TCE and PCE contamination in bedrock groundwater underneath the Facility is not caused by releases from the Facility, but rather from upgradient sources.

B. Surface Water

Delbar collected surface water samples from a creek that flows along the eastern boundary of the Facility. Of the contaminants detected in the creek, only TCE was found in concentrations above its MCL. The distribution of TCE in the surface water demonstrates that the source of the TCE is upgradient from the Facility.

C. Air (indoors)

During the RFI, Delbar conducted indoor air sampling. VOCs including 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene, 1,4-dichlorobenzene, 2-propanol, 4-ethyltoluene, acetone, benzene, carbon disulfide, chloromethane, cyclohexane, dichlorodifluoromethane, ethylbenzene, heptane, hexane, m/p-xylene, tetrachloroethene, tetrahydrofuran, toluene, total xylenes, and trichloroethene were detected in the ambient air of the building samples. 1,2,4-trimethylbenzene, 1,4-dichlorobenzene, benzene, ethylbenzene, and trichloroethene were detected at concentrations above their respective Act 2 residential MSCs for indoor air, but below their respective Act 2 non-residential MSCs for indoor air. Therefore, while the Facility continues to be used for industrial purposes, the detected levels do not pose a threat to human health. If the Facility were ever developed for residential use, however, EPA proposes that additional remediation be conducted under EPA and/or PADEP authorities to attain Act 2 residential MSCs for indoor air.

D. Building Interior

Delbar performed interior sampling of the Facility building to determine whether there was any contamination caused by the Facility's releases and whether any contamination had migrated from the building to other media. The indoor air sampling included sampling of the building floor slab, sub-slab soils and soil vapor.

1. Floor Slab Samples

As shown in Table 1, below, five VOCs, bromomethane, methyl acetate, methyl ethyl ketone, tetrachloroethene, and trichloroethene, were detected in concrete chips at concentrations of 550 micrograms per kilogram (ug/kg), 710 ug/kg, 250 ug/kg, 270 ug/kg, and 570 ug/kg, respectively. Those concentrations were below the EPA Region III residential soil direct contact RBCs of 110 mg/kg, 78000 mg/kg, 47000 mg/kg, 1.2 mg/kg, and 1.6 mg/kg, respectively. EPA has, therefore, determined that the concentrations of those parameters in the concrete chip samples do not pose an unacceptable risk to human health or the environment.

In order to determine whether the detected VOCs impacted the groundwater quality, Delbar compared the VOC concentrations in the sub-slab samples to EPA Region III's transfer to groundwater soil screening level (SSL) RBCs. The SSL RBCs are calculated to protect underlying groundwater based on EPA's tap water screening values (Tap Water SSL) or MCLs (MCL SSL), and Act 2's soil to groundwater MSCs, which are also represented in Table 1, below.

Table 1
Concrete Chip Samples - VOCs

VOCs	Concrete Chip Samples Results (micrograms per kilogram (ug/kg))	EPA Res. Soil RBCs (mg/kg)	EPA Tap Water SSLs (DAF20) (ug/kg)	EPA MCL SSLs (DAF20) (ug/kg)	Act 2 Residential Soil to GW MSCs (ug/kg)
Bromomethane	550	110	41		1000
Methyl Acetate	710	78000	24829		3700000
Methyl Ethyl Ketone	250	47000	29016		280000
Tetrachloroethene	270	1.2	4.7	227.0	500
Trichloroethene	570	1.6	0.26	49.3	500

Bromomethane was detected at concentrations above the EPA Tap Water SSL, but below the Act 2 Residential Soil to Groundwater MSC. Bromomethane is not considered a site-wide constituent of concern.

Methyl acetate and methyl ethyl ketone were detected below the EPA Tap Water SSLs and the Act 2 soil to groundwater MSCs.

Tetrachloroethene was detected above the EPA MCL SSL and below the Act 2 Soil to

Groundwater MSC, and trichloroethylene was detected above both the EPA MCL SSL and Act 2 Soil to Groundwater MSC. While the concentrations of tetrachloroethene and trichloroethylene exceed their respective EPA MCL SSLs and in the case of trichloroethylene, its Act 2 Soil to Groundwater MSC, in concrete chip samples, as shown in Table 4, below, those constituents do not exceed their respective MCLs in sub-slab samples. Therefore, EPA concluded that tetrachloroethene and trichloroethylene are not migrating to the groundwater at the Site.

2. Sub-Slab Samples

During the RFI, Delbar sampled sub-slab soils for inorganic constituents and VOCs.

a. Sampling Results for Inorganics

Seven inorganic parameters, arsenic, barium, cadmium, chromium, lead, mercury, and silver, and seven VOCs, acetone, cis-1,2-dichloroethene, dichlorodifluoromethane, MEK, PCE, xylenes, and TCE, were detected in sub-slab samples. As shown in Table 2 immediately below, the sample results were compared to the EPA Region III Residential Soil RBCs and Act 2 Residential MSC for Soils.

Table 2
Sub-Slab Samples - Inorganics

Inorganics	Highest conc. In sub-slab soil samples (milligrams per kilogram (mg/kg))	EPA Residential Soil RBCs (mg/kg)	EPA Industrial Soil RBCs (mg/kg)	EPA clean up standard (mg/kg)	Act 2 Residential MSC for Soil (mg/kg)
Arsenic, Total	7.6	0.43		20	12
Barium, Total	264	16000			
Cadmium, Total	0.83	39 (cadmium - water)			47
Chromium, Total	516	230 (Cr VI)	3100 (Cr VI)		94
Lead, Total	157			400	500
Mercury, Total	0.11	7.8 (methyl mercury)			
Silver, Total	3.9	390			

Arsenic was detected at concentration as high as 7.6 milligrams per kilogram (mg/kg) in the building sub-slab. The Act 2 MSC for arsenic in residential soil is 12 mg/kg. EPA's residential clean up level for arsenic is 20 mg/kg. EPA has, therefore, determined that the concentrations of arsenic in the sub-slab of the building at the Facility do not pose an unacceptable risk to human health or the environment.

Barium, cadmium, mercury, and silver were detected at concentrations as high as 264 mg/kg, 0.83 mg/kg, 0.11 mg/kg, and 3.9 mg/kg, respectively. The EPA Region III residential soil direct contact RBCs for barium is 16000 mg/kg, for cadmium (water) is 39 mg/kg, for methyl mercury is 7.8 mg/kg, and for silver is 390 mg/kg. EPA has, therefore, determined that the concentrations of those inorganic parameters in the sub-slab of the building at the Facility do not pose an unacceptable risk to human health or the environment.

Total chromium was detected at concentrations as high as 516 mg/kg in the building sub-slab, above the EPA Region III residential soil direct contact RBC of 230 mg/kg and Act 2 MSC of

94 mg/kg. The EPA Region III industrial soil direct contact RBC for chromium VI is 3100 mg/kg. Therefore, EPA has determined that as long as the Facility is used for industrial purposes, the concentrations of chromium in the sub-slab of the building at the Facility do not pose an unacceptable risk to human health or the environment. If, however, the Facility were ever developed for residential use, EPA's proposed remedy would require Delbar to attain the Act 2's residential MSC for chromium.

Lead was detected at concentrations as high as 157 mg/kg. EPA's residential clean up level for lead is 400 mg/kg. EPA has, therefore, determined that the concentrations of lead in the sub-slab of the building at the Facility do not pose an unacceptable risk to human health or the environment.

The detected concentrations of inorganics in sub-slab samples were also compared to the EPA Region III's transfer to groundwater SSL RBCs to determine whether the contaminants have impacted the groundwater quality. The maximum concentrations of inorganics in sub-slab soil samples; the associated EPA Region III Tap Water SSLs; the MCL SSLs, and the Act 2 soil to Groundwater MSCs are summarized in Table 3 as below:

Table 3
Sub-Slab Samples - Inorganics

Inorganics	Sub-slab soil Samples Results (mg/kg)	EPA Tap Water SSLs (DAF20) (mg/kg)	EPA MCL SSL (DAF20) (mg/kg)	Act 2 Soil to Groundwater MSCs (mg/kg)
Arsenic, Total	7.6	0.026	5.8	5
Barium, Total	264	2105	1647.7	200
Cadmium, Total	0.83	27.4	7.5	0.5
Chromium, Total	516			10
Lead, Total	157			0.5
Mercury, Total	0.11			0.2
Silver, Total	3.9	31	17	10

Of the inorganic parameters, arsenic was detected at concentrations as high as 7.6 mg/kg, slightly above the EPA Region III MCL SSL of 5.8 mg/kg and PADEP's soil to groundwater Act 2 MSC of 5 mg/kg. Barium was found in one sample at concentration of 264 mg/kg, slightly above PADEP's soil to GW Act 2 MSC. Cadmium, chromium and lead were detected at concentrations as high as 0.83 mg/kg, 516 mg/kg, 157 mg/kg, above Act 2 Soil to Groundwater

MSCs. Of those contaminants, only arsenic and lead were found in groundwater, however, arsenic and lead are not considered site-wide constituents of concern.

b. Sub-slab Sampling Results for VOCs

The maximum concentrations of VOCs in sub-slab soil samples, the associated EPA Tap Water SSLs, EPA MCL SSLs, Act 2 Soil to Groundwater MSCs, and EPA Region III Soil RBCs are summarized in Table 4 as below:

Table 4
Sub-Slab Samples - VOCs

VOCs	Sub-slab soil Samples Results (ug/kg)	EPA Tap Water SSLs (DAF20) (ug/kg)	EPA MCL SSL (DAF20) (ug/kg)	PADEP Act 2 Soil to Groundwater MSCs (ug/kg)	EPA Soil RBCs (mg/kg)
Acetone	80	22134		370000	70000
cis-1,2-dichloroethene	24	349	401.8	7000	780
Dichlorodifluoromethane	7	10986		100000	16000
Methyl Ethyl Ketone	13	29016		280000	47000
Tetrachloroethene	2	4.7	227.1	500	1.2
Total Xylenes	5	2974	139874	1000000	16000
Trichloroethene	44	0.26	49.3	500	1.6

All VOCs were detected at concentrations below the EPA Tap Water SSLs or MCL SSLs and the Act 2 Soil to Groundwater MSCs, except for TCE. With respect to TCE, based upon other information including concentration of TCE in concrete chip samples and concentrations of TCE in shallow groundwater, the RFI concluded that the concentrations of TCE in floor slab and sub-slab samples do not appear to be a source of contamination to shallow groundwater, bedrock groundwater or surface water in the vicinity of the Facility.

3. Soil Vapor

Soil vapor samples were taken from below the building slab. Elevated concentrations of VOCs were detected in the samples. The VOCs detected in the soil vapor samples include 1,1,1-TCA, 1,4-Dichlorobenzene, acetone, benzene, carbon disulfide, chloroform, cis-1,2-dichloroethene, ethylbenzene, m/p-Xylene, o-Xylene, tetrachloroethene, toluene, trans 1,2-

dichloroethene, trichloroethene, and vinyl chloride. For each of these compounds, at a maximum detected soil vapor concentration, a correspondent groundwater concentration was calculated. The calculated groundwater concentrations are compared to the actual maximum groundwater concentrations detected in the groundwater beneath the Facility. If the calculated concentration is greater than the actual maximum concentration, then the groundwater concentration could be caused by the sub-slab soil vapor. If the calculated concentration is less than the actual maximum concentration, then the groundwater concentration could not be caused by the sub-slab soil vapor. The maximum concentrations of VOCs detected in soil vapor samples, the locations where maximum groundwater concentrations detected, and the associated calculated groundwater concentrations and actual maximum groundwater concentrations are summarized in Table 5 as below:

Table 5

VOCs	Maximum Vapor detected below slab (ppb/v)	Calculated Groundwater conc. Based on observed Max. Vapor Conc. (ug/l)	Actual Max. GW Conc. (ug/l)	Location of Max. GW Conc.
1,1,1-TCA	7.8	0.0635	7.6	Sump 1
1,4-dichlorobenzene	12	0.76	0.74	MW1
Acetone	350	550.5	3.2	MW5
Benzene	9	0.133	0.63	MW3
Carbon Disulfide	46	0.1215	ND	-
Chloroform	1	0.035	0.41	EPAMW2D
cis-1,2-Dichloroethene	26	0.65	49	EPAMW1D
Ethylbenzene	5.9	0.084	450	MW3
m/p-Xylene	22	0.334	1400	MW3
o-Xylene	11	0.236	1400	MW3
Tetrachloroethene	44	0.417	33	Sump 1
Toluene	22	0.321	3.5	MW3
trans-1,2-DCE	0.95	0.0103	0.9	MW1
TCE	370	4.961	3900	EPAMW1D
Vinyl chloride	3.9	0.0094	ND	-

1,1,1-TCA, benzene, chloroform, cis-1,2-dichloroethene, ethylbenzene, xylenes, tetrachloroethene, toluene, trans-1,2-DCE, TCE, and vinyl chloride were detected at concentrations where the calculated groundwater concentrations are less than the actual maximum groundwater concentrations. Only calculated groundwater concentrations for 1,4-Dichlorobenzene, acetone, and carbon disulfide were greater than the actual value. However, carbon disulfide was not detected in the groundwater beneath the Delbar facility. The EPA MCLs for 1,4-dichlorobenzene and acetone are 75 ug/l and 5475 ug/l, respectively. The PADEP Act 2 MSCs for 1,4-dichlorobenzene and acetone are 75 ug/l and 3700 ug/l, respectively.

Both EPA MCLs and PADEP MSCs are higher than the maximum concentrations which could possibly result in soil vapors beneath the concrete slab.

The sampling results show that the elevated concentrations of VOCs in the groundwater could not have come from a release from the building interior through the floor slab.

IV. Proposed Final Remedy

EPA is proposing a Corrective Action Complete with Controls determination as the final remedy for the Facility. EPA believes that no further actions to remediate soil, groundwater or indoor air be required at the Facility because levels of contamination in soils and indoor air are protective of human health and the environment under the current land use. To ensure that protection of human health is maintained at the Facility, EPA is proposing to require Delbar to implement and maintain institutional controls as discussed in more detail in Section V., immediately below.

V. Institutional Controls

Institutional controls are non-engineered instruments such as administrative and/or legal controls that minimize potential for human exposure to contamination and protect the integrity of the corrective measures by limiting land or resource use. EPA's proposed final remedy requires Delbar to file a notice on the deed to the Facility property notifying prospective buyers of the environmental conditions at the Facility. EPA is also proposing, through agreements with or orders from PADEP or EPA, to require that Act 2 residential MSC for chromium and the Act 2 MSCs for indoor air are attained if the Facility were ever developed for residential use.

VI. Financial Assurance

EPA has evaluated whether financial assurance for corrective action is necessary to implement EPA's proposed remedy at the Facility. Given that EPA's proposed remedy does not require any further actions to remediate soil, groundwater or indoor air contamination at this time and given that the costs of implementing institutional controls at the Facility will be de minimis, EPA is proposing that no financial assurance be required.

VII. Evaluation of Criteria

This section provides a description of the criteria EPA uses to evaluate proposed final remedies under the Corrective Action Program. The criteria are applied in two phases. In the first phase, EPA evaluates four remedy threshold criteria as general goals. In the second phase, for those remedies which meet the threshold criteria, EPA then evaluates five balancing criteria to determine which proposed remedy alternative provides the best relative combination of attributes.

A. Threshold Criteria

EPA's evaluation of the threshold criteria follows:

1. Protect human health and the environment

EPA has determined that the Facility is not a source of contamination to the shallow groundwater, bedrock groundwater or surface water in the vicinity of the Facility. While there were VOCs in the ambient air in the building in concentrations above Act 2 Residential MSCs for indoor air and isolated elevated concentrations of metals under the building slab, the proposed remedy requires that if the Facility is developed for residential use, the Act 2 Residential MSCs for indoor air and for soil will be met. Therefore, the proposed Corrective Action Complete with Controls determination is protective of human health and the environment.

2. Achieve media cleanup objectives

There were VOCs in the ambient air in the building in concentrations above Act 2 Residential MSCs for indoor air and isolated elevated concentrations of metals in soil under the building slab. The concentrations of contaminants in the ambient air and soil do not exceed Act 2 Non-Residential MSCs. The proposed remedy requires that if the Facility is developed for residential use, the Act 2 residential MSCs for indoor air and for soil will be attained prior to such use.

3. Control the source(s)

The proposed remedy through the implementation of institutional controls will ensure that if the Facility is developed for residential use, Act 2 residential MSCs for indoor air and for soil will be attained.

4. Comply with Applicable Standards for Waste Management

The proposed remedy does not involve any waste management. Therefore, this criterion does not apply.

B. Balancing Criteria

When EPA is satisfied that the proposed remedy is protective of human health and the environment, an evaluation of other alternatives is not necessary. Nonetheless, EPA presents the five criteria below to illustrate the suitability of the proposed remedy:

1. Long-Term Reliability and Effectiveness

EPA's proposed remedy is effective and reliable in the long-term. Institutional controls

requiring that Act 2 residential MSCs for indoor air and for soil be attained if the Facility is developed for residential use, will be implemented through agreements with or orders from PADEP or EPA.

2. Reduction of Toxicity, Mobility, or Volume of Wastes

Should the Facility ever be developed for residential use, Act 2 residential MSCs for indoor air and for soil will be attained thereby reducing the toxicity, mobility and volume of contaminants in indoor air and soil.

3. Short-Term Effectiveness

The levels of indoor air contamination do not represent an immediate threat to anyone under the current industrial use of the Facility. The indoor air contamination poses a threat if the building were used for residential purposes.

4. Implementability

The remedy is readily implementable through the oversight of PADEP under Act 2 and/or EPA under RCRA.

5. 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. The proposed corrective measures provide a cost-effective approach for the conditions that exist at the Facility.

VIII. Environmental Indicators

Under the Government Performance and Results Act (GPRA), EPA has set national goals to address RCRA corrective action facilities. Under GPRA, EPA evaluates two key environmental clean-up indicators for each facility: (1) Current Human Exposures Under Control and (2) Migration of Contaminated Groundwater Under Control. Delbar is one of Region III's medium priority facilities and falls under GPRA. On August 18, 2006, EPA determined that the Facility had met both environmental clean-up indicators.

IX. Public Participation

EPA is requesting comments from the public on its proposal to select a Corrective Action Complete With Control determination as the final remedy for the Facility. On August 8, 2007,

EPA placed an announcement in the local newspaper, the News Herald, to notify the public of the availability of this Statement of Basis, its supporting Administrative Record and the public's opportunity to request a public meeting on EPA's proposed corrective action for the Facility. The public comments period will last forty-five (45) calendar days from the date that this matter is publicly noticed in a local paper. Comments should be sent to EPA in writing at the EPA address listed below, and all commentors will receive a copy of the final decision and a copy of the response to comments.

A public meeting will be held on request. Requests for a public meeting should be made to Ms. Tran Tran of the EPA Regional Office at the address listed below or at 215-814-3415.

The Administrative Record contains all information considered when making this proposal. The Administrative record is available for review during business hours at the two following locations:

U.S. Environmental Protection Agency
Region III (3WC22)
1650 Arch Street
Philadelphia, PA 19103
Contact: Tran Tran
Phone: 215-814-2079
Fax: 215-814-3113
E-mail: trantran@epa.gov

Bucks County Free Library Samuel Pierce Branch
491 Arthur Avenue
Perkasie, PA 18944

Following the forty-five day public comment period, EPA will prepare a Final Decision and Response to Comments in which it will identify the selected remedy for the Facility. The Response to Comments will address all significant written comments and any significant oral comments generated at a public meeting if a meeting is held. The Final Decision and Response to Comments 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 remedy for the Facility as proposed by EPA in this Statement of Basis, EPA will seek additional public comments on any proposed revised remedy.

Date

US EPA, Region III

Abraham Ferdas, Director
Waste and Chemical Management Division