



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III

FINAL DECISION AND RESPONSE TO COMMENTS

ITW Philadelphia Resins
Montgomeryville, Pennsylvania
EPA ID NO. PAD002278224

I. FINAL DECISION - Corrective Action Complete without Controls

The United States Environmental Protection Agency (EPA) has determined that no further action is required to make this property suitable for any type of land use. This is based on our findings as detailed in the Statement of Basis (SB). This determination is consistent with EPA's February 2003 *Final Guidance on Completion of Corrective Action Activities at RCRA Facilities* (reference 68 FR 8757).

II. PUBLIC COMMENT PERIOD

On December 21, 2012, EPA proposed a determination of "Corrective Action Complete without Controls." Consistent with public participation provisions under the Resource Conservation and Recovery Act (RCRA), EPA requested comments from the public on the proposed decision as described in the SB. The commencement of a thirty (30)-day public comment period was announced in The North Penn Reporter on January 15, 2013 and on the EPA Region III website. The public comment period ended on February 14, 2013 .

III. RESPONSE TO COMMENTS

EPA received no comments on its proposed Final Remedy. However, on February 12, 2010 there was a 200 gallon spill that was not mentioned in the SB. The spill was confined to the asphalt covered parking lot. The spilled material, polyamido amine, is a non-hazardous adhesive hardener. The spill cleanup was handled by Clean Harbors Environmental Services. There was no contamination of the surrounding environment. Therefore the spill on February 12, 2010, has not modified the Final Remedy as proposed in the SB.

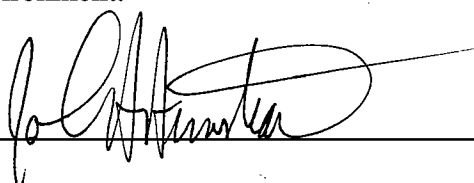
The SB is hereby incorporated into this Final Decision by reference and made a part hereof as Attachment A.

IV. AUTHORITY

EPA is issuing this Final Decision under the authority of the Solid Waste Disposal Act, as amended by RCRA, and the Hazardous and Solid Waste Amendments (HSWA) of 1984, 42 U.S.C. Sections 6901 to 6992k.

V. DECLARATION

Based on the Administrative Record compiled for the Corrective Action at the ITW Philadelphia Resins facility, EPA has determined that the Final Remedy selected in this Final Decision and Response to Comments is protective of human health and the environment.



John A. Armstead, Director
Land & Chemicals Division
U.S EPA Region III

2.28.13

Date

Attachment A: Statement of Bases
ITW Philadelphia Resins
EPA ID NO. PAD002278224



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III

STATEMENT OF BASIS

ITW PHILADELPHIA RESINS
MONTGOMERYVILLE, PENNSYLVANIA

Prepared by
Office of Pennsylvania Remediation
Land and Chemicals Division
December 2012

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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 ITW Philadelphia Resins facility located at 130 Commerce Drive, Montgomeryville, Montgomery County, 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 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, 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

ITW Philadelphia Resin, a division of Illinois Tool Works (ITW), facility is a 3-acre parcel with a 38,000 square foot manufacturing building, located in the southeastern section of Montgomeryville, Pennsylvania.

The site is located in the Montgomeryville Industrial Center in Montgomery Township, Montgomery County, PA. The site is surrounded by commercial and light industry properties. Residential areas are located further to the northwest, northeast and southeast of the industrial park. A commercial quarry operation is located southwest of the industrial park. A day care facility is located approximately 200 ft northwest of the facility. Reference Figure 1: Facility Location Map.

The Property was purchased by Philadelphia Resin Corporation in 1973, and was operated as a manufacturing facility. ITW purchased the property in 1983. The Facility was permitted to operate a hazardous waste storage facility.

The facility currently generates a variety of adhesives and specialty coating for industrial and marine applications. Products are epoxy-based adhesives, specialty coating and pourable chocking and grouting compounds. Manufacturing process consist of blending raw materials to form the finished products. The raw materials include epoxy resins, hardeners, fillers and modifiers. Wastes are generated as a result of cleaning the mixing equipment with solvents after use. Wastes generated at the facility consist of D001 (characteristically ignitable) and F003/F005 (spent non-halogenated solvents) wastes. All wastes that contain resin and curing agents are subsequently drummed and transported to the waste accumulation area for offsite disposal by licensed contractors.

The current hazardous waste storage area is located inside the building in the northeast corner. The area is constructed with concrete floors and secondary containment. Prior to 1984 the accumulation area was outside of the northwest corner of the building and consisted of an open caged area. In 1984, the outdoor accumulation area was closed in accordance with the approved closure plan, and the facility constructed an addition to the building in the same area.

There are six aboveground storage tanks (ASTs) located at the site. Three ASTs are located along the inside western wall and three ASTs are located inside along the southwestern corner of the building. All ASTs are situated on concrete floors within secondary containment that consists of three-foot high concrete wall. Reference Figure 2: Facility Layout.

Section 3: Summary of Environmental History

Based upon information in the November 2010 Environmental Indicator (EI) Inspection Report. EPA has determined that there is no evidence of spills or releases at the facility. There are no reports of spills or releases. Waste storage is currently in an enclosed area with secondary containment. The former outdoor waste storage area was closed in accordance with the Pennsylvania Department of Environmental Resources approved 1984 closure plan. Although there have been no environmental investigation at the site, none is warranted based on past and current operating practices. The most recent inspection was conducted by Pennsylvania Department of Protection in 2011, no violations were noted.

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 EPA has determined that the Facility met the migration of contaminated groundwater under control indicator on March 27, 2012. The EPA has determined that the Facility met the current human exposures under control indicator on March 27, 2012.

Section 5: 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: Catheryn Blankenbiller
Phone: (215) 814-3464
Fax: (215) 814-3113
Email: blankenbiller.catheryn@epa.gov

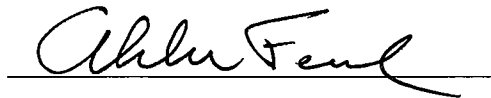
Interested parties are encouraged to review the AR and comment on EPA's proposed decision. The public comment period will last thirty (30) calendar days from the date that notice is published in a local newspaper. You may submit comments by mail, fax, or e-mail to Ms. Catheryn Blankenbiller. EPA will hold a public meeting to discuss this proposed decision upon request. Requests for a public meeting should be made to Ms. Catheryn Blankenbiller.

Statement of Basis

Section 5: Public Participation (continued)

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. Catheryn Blankenbiller at the address listed above.

Date: 12/21/12



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

Index to Administrative Record

Approved Closure Plan, prepared by Philadelphia Resins Corporation, approved by PADEP November 1984.

Environmental Indicator (EI) Current Human Exposures under Control, prepared by PADEP, March 2012.

Environmental Indicator Inspection Report for ITW Philadelphia Resins, Commerce Drive, Montgomeryville, Pennsylvania 18936, prepared by Michael J. Baker Inc., November 2010

Environmental Indicator (EI) Migration of Contaminated Groundwater under Control, prepared by PADEP, March 2012.

US EPA Part A Permit Application, Consolidated Permit Programs, prepared by Philadelphia Resins Corp., November 14, 1980.

Statement of Basis



Source: Google maps

SCALE: 1" ~ 950'
S.O. NO.: 118033
DSN/DWN:TME/TME

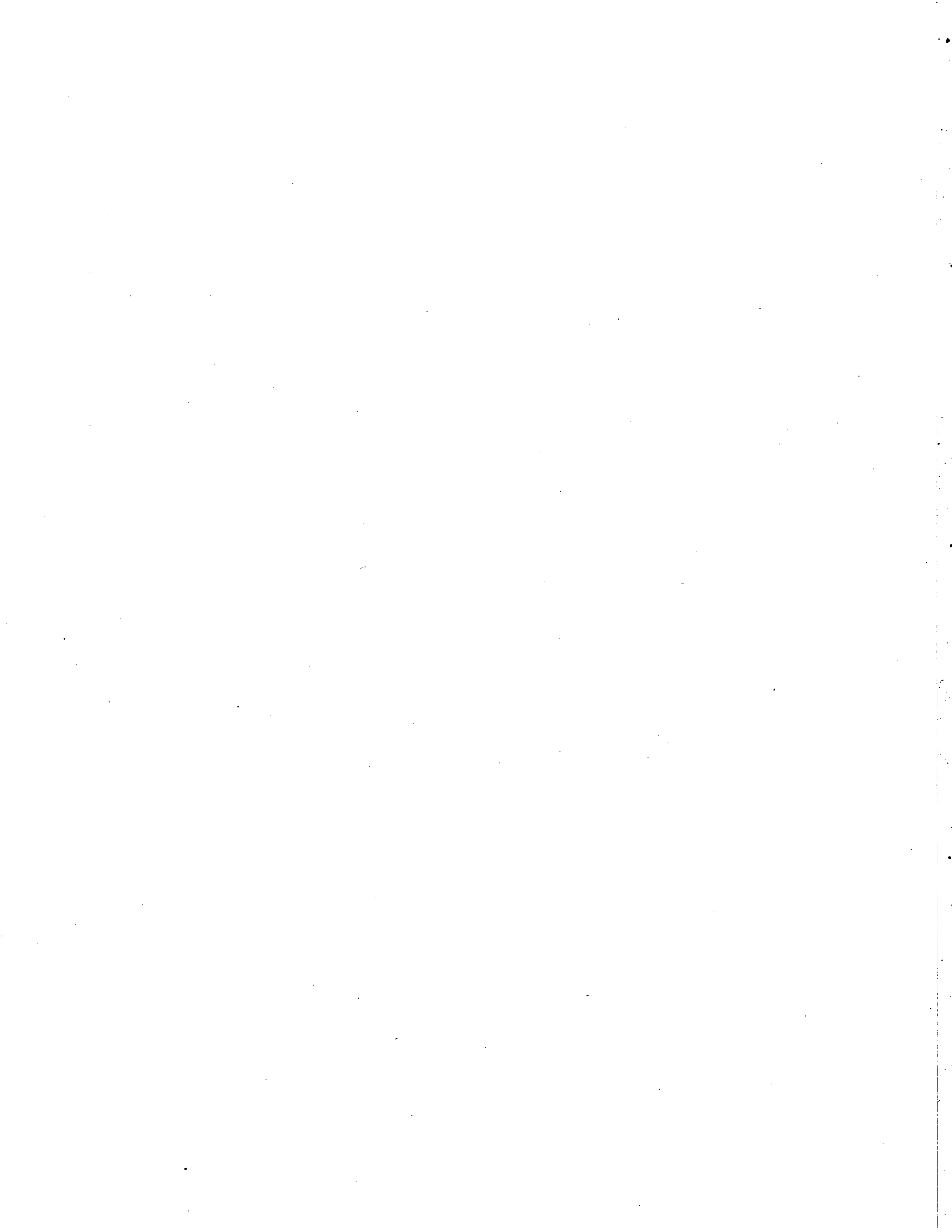
DATE:AUGUST 2010
FILE: 118033-ITW-01
CHK: TE

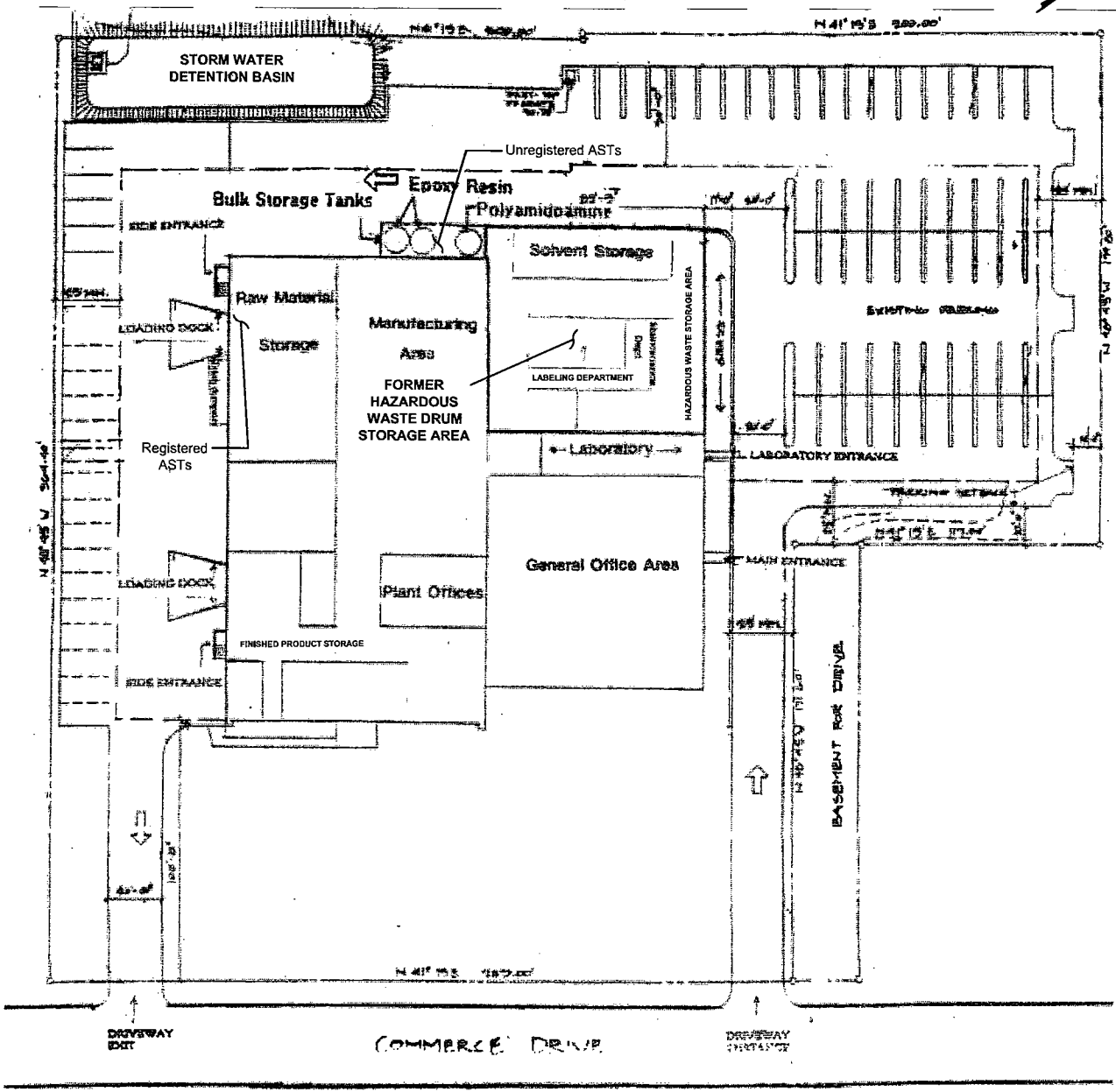
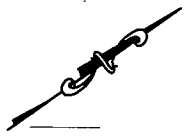
Baker

MICHAEL BAKER JR., INC.
MOON TOWNSHIP, PENNSYLVANIA

LAT=40°13'51" N
LON=75°13'32" W

FIGURE 1: FACILITY LOCATION MAP
ITW PHILADELPHIA RESINS
130 COMMERCE DRIVE
MONTGOMERYVILLE, PA 18936





*SOURCE: FACILITY'S JANUARY 4, 1993 NOTICE OF INTENT FOR COVERAGE UNDER NPDES GENERAL PERMIT.
 *NOTATIONS IN RED ADDED BY BAKER TO HIGHLIGHT CERTAIN AREAS DESCRIBED IN THE ENVIRONMENTAL INDICATOR INSPECTION REPORT.

SCALE: Not To Scale DATE: AUGUST 2010
 S.O. NO.: 118033 FILE: 118033-ITW-02
 DSN/DWN: TME/TME CHK: TE

Baker MICHAEL BAKER JR., INC.
 MOON TOWNSHIP, PENNSYLVANIA

FIGURE 2: FACILITY LAYOUT
 ITW PHILADELPHIA RESINS
 130 COMMERCE DRIVE
 MONTGOMERYVILLE, PA 18936