



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III

STATEMENT OF BASIS

GAF MATERIALS CORPORATION
QUAKERTOWN, PENNSYLVANIA
EPA ID # PAD096847835

Prepared by
Office of Pennsylvania Remediation
Land and Chemicals Division
August 2013

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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 GAF Materials Corporation facility located at 60 Pacific Drive, Quakertown, Pennsylvania 18951 (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, 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 GAF Materials Corporation facility is an approximately 25-acre parcel located approximately 13 miles southeast of Allentown in the northern section of Quakertown, Pennsylvania.

The site is bound to the east by a rail line, to the south and west by Pacific Drive, and to the north by light industrial development. The vicinity of the site is a combination of light industry and recreational and residential property. A location map and a Facility layout are attached as Figures 1 and 2, respectively.

The Facility was established on December 15, 1979 by Georgia-Pacific Corporation. Georgia-Pacific had purchased the Facility in two separate parcels from the American Funding Corporation. The first 20-acre parcel was purchased in 1978 and the adjoining 5-acre parcel in August 1979. Prior to Georgia-Pacific development, the site was believed to be a farm. Georgia-Pacific operated the Facility until March 1994 when Atlas Roofing Corporation purchased Georgia-Pacific's roofing business. The Building Materials Corporation of America, doing business as GAF Materials Corporation, purchased the Facility in May 2004. In 2008, GAF Materials Corporation ceased operations at the Facility, which remains dormant in the hopes of potential future reuse.

Throughout the changes in ownership, the Facility manufactured asphalt shingle roofing, roll roofing, and felt underlayment for roofing applications.

Section 3: Summary of Environmental History

A 1991 Preliminary Assessment identified five Solid Waste Management Units (SWMUs) at the Facility. A 2004 Environmental Indicator (EI) Inspection Report provided updated information on these SWMUs and included additional areas of concern (AOCs) due to subsequent releases and remedial activities at the Facility. The table below describes these SWMUs/AOCs as well as their post-investigation status. Complete details, including sampling data, can be found in the individual reports which are listed in the Index section of this SB and located in the AR. Sampling included soil and groundwater and covered the SWMUs/AOCs impacted by releases at the Facility. Target screening levels were determined to be EPA Region 3's residential Regional Screening Levels (RSLs) for Volatile Organic Compounds (VOCs) in soil and EPA's Maximum Contaminant Level (MCL) national primary drinking water standards for VOCs in groundwater.

SWMU/AOC	Description	Current status
Former Drum Storage Area	Previously stored heat transfer oil, motor oil, transmission fluid, and grease drums	No evidence of spills or releases observed or reported
Waste Oil Tanks (two 275-gallon; one 600-gallon)	Collect waste oil from condensing of vapors during shingle manufacturing; 100-gallon spill in 1983 resulted in removal of 150 yd ³ of contaminated soil and implementation of preventive measures	No further action required after cleanup of 1983 spill; no evidence of further spills or releases observed or reported
Hydrocarbon Collection System	Collects fumes from top of asphalt tanks for treatment through carbon bed	No evidence of spills or releases observed or reported
Safety-Kleen Units (one 25-gallon; one 10-gallon)	Parts washers used in the maintenance shop and lift truck shop; 2003 PADEP inspection noted that non-hazardous solvents are used in these units	No evidence of spills or releases observed or reported
Solvent Distillation Unit	Small unit used in laboratory to test shingle quality	No evidence of spills or releases observed or reported
Former 14,000-gallon Fuel Oil Tank	Piping from this AST failed; tank and piping were disposed of off-site in 1993; two investigations resulted in removal of 4800 tons of contaminated soil; some total petroleum hydrocarbons (TPH) remain in limited areas of subsurface where excavation not possible due to underground utilities	Low levels of TPH remaining after 1993 remediation have likely been attenuated to non-detectable levels as a result of natural degradation processes

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Asphalt Tanks (four 40,000-gallon; one 10,000-gallon)	Store asphalt product; one tank sprayed product over an approximately 16,900 ft ² area in 2003; asphalt solidified on contact with ground; 66 tons of asphalt and impacted surface soil excavated and disposed off-site	No further action required; no evidence of further spills or releases observed or reported
Industrial Wastewater and Stormwater Discharges	Permit for process water discharge to Quakertown Wastewater Plant; NPDES general permit for stormwater discharges	No evidence of non-compliance with permit requirements
Air Emission Sources	Several heaters, vents, and stacks that exhaust to outdoor air; many of these sources had contributed to odor problems in the past	As of 2001, all air emissions are regulated under Title V Permit
Facility Groundwater	One release to perched groundwater occurred as a result of leaking piping from former 14,000-gallon fuel oil AST; low levels of TPH and xylenes were detected in grab samples within excavation in 1993	Low levels of TPH and xylenes have likely been attenuated to non-detectable levels as a result of natural degradation processes

In summary, concentrations of hazardous constituents identified in the soil are within EPA's Regional Screening Level risk range for residential use, and concentrations of hazardous constituents identified in groundwater are all below EPA's Maximum Contaminant Level national primary drinking water standards. Therefore, there are no unacceptable risks to human health or the environment from hazardous constituents at this Facility.

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 these indicators on June 4, 2013.

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: Griff Miller
Phone: (215) 814-3407
Fax: (215) 814-3113
Email: miller.griff@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 Mr. Miller. EPA will hold a public meeting to discuss this proposed decision upon request. Requests for a public meeting should be made to Mr. Miller.

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 Mr. Miller at the address listed above.

Date: 8/26/13

_____/Wayne S. Naylor/ for

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

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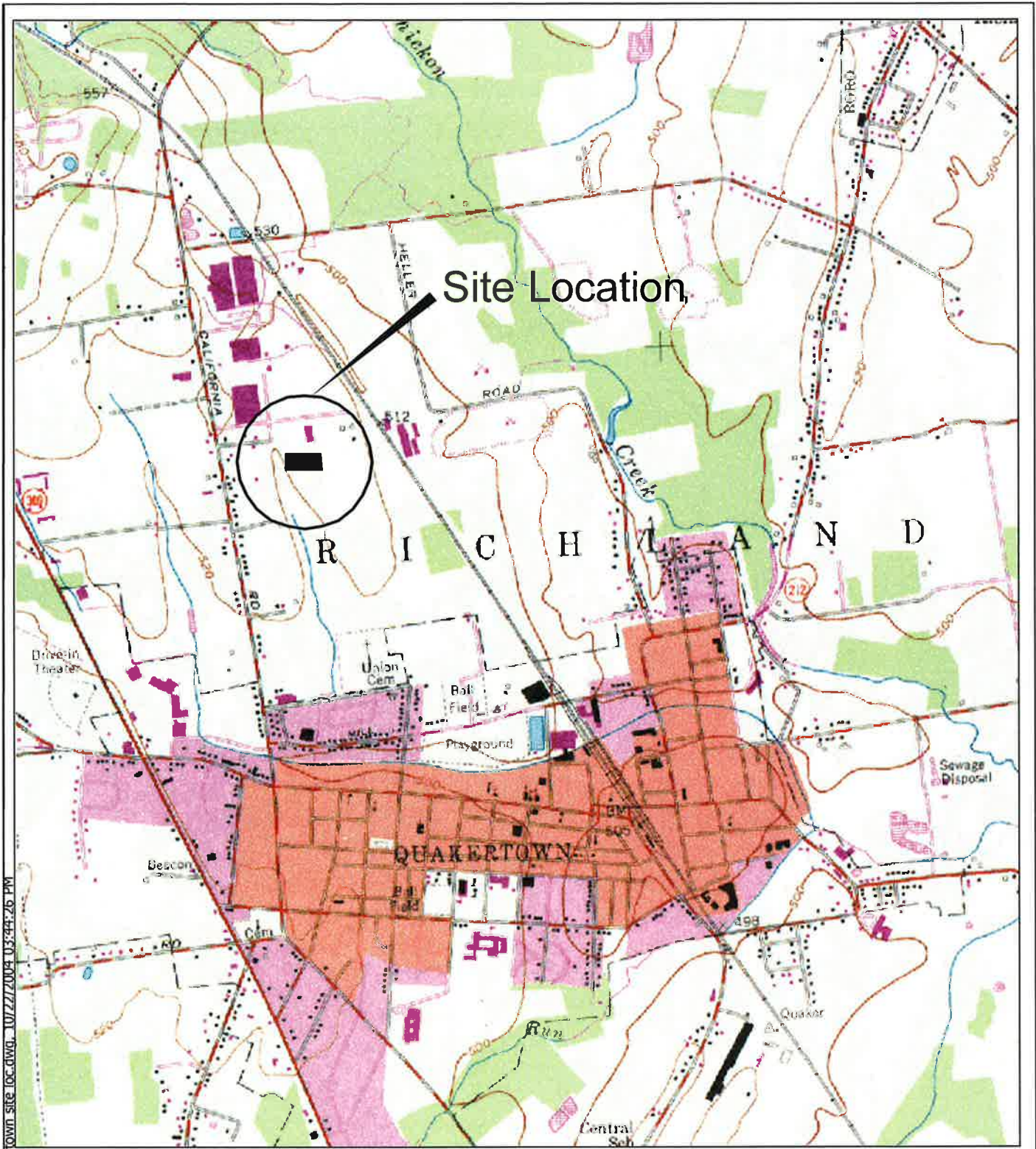
Index to Administrative Record

Environmental Priorities Initiative, Preliminary Assessment of Georgia-Pacific Corporation, NUS Corporation, June 1991.

Limited Subsurface Investigation of Georgia-Pacific Corporation, Waste Concepts, August 1993.

Memos from Durham Environmental and Remediation Service to PADEP Regarding Asphalt Spill, March 14 and 20, 2003.

Final Environmental Indicator Inspection Report for Atlas Roofing Corporation, 60 Pacific Drive, Quakertown, PA 18951, prepared by Tetra Tech FW, August 2004.

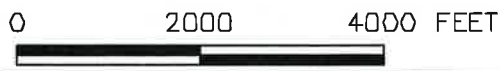


Site Location

Source: U.S.G.S. Topographic Maps (7.5 Minute)
 Quakertown, PA Quadrangle



QUADRANGLE LOCATION



Commonwealth of Pennsylvania
 Department of Environmental Protection

Atlas Roofing Corporation
 Quakertown, PA

Figure 1
 Site Location Map



TETRA TECH FW, INC.

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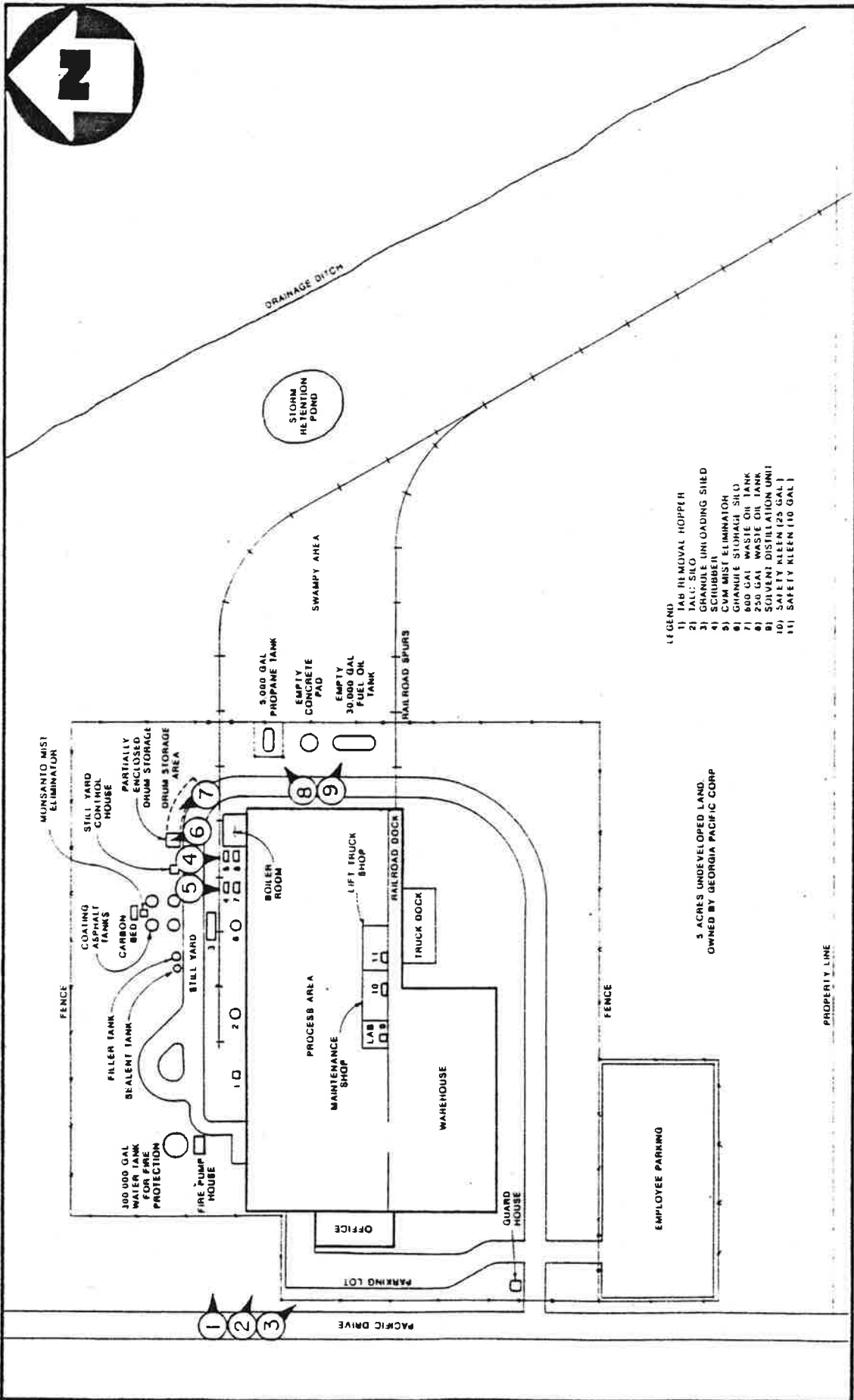


PHOTO LOCATION MAP
GEORGIA-PACIFIC CORP., QUAKERTOWN, PA
 (NO SCALE)