



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III
STATEMENT OF BASIS
GREENE, TWEED & CO.
KULPSVILLE, PENNSYLVANIA
EPA ID NO. PAD980555197

I. Introduction

The United States Environmental Protection Agency (EPA) has prepared this Statement of Basis (SB) for the Greene, Tweed & Co. facility located at 2075 Detwiler Road in Kulpville, Pennsylvania 19443 (Facility). EPA's review of available information including compliance history, past and present manufacturing operations, waste management activities, in addition to observations during an April 19, 2011 site visit indicates that there are no unaddressed releases of hazardous waste or hazardous constituents from the Facility. Based on that assessment, our 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 V, Public Participation, for information on how you may review the AR.

II. Facility Background

The Facility is located at 2075 Detwiler Road in Kulpville, Towamencin Township, Montgomery County, Pennsylvania. The Facility is bordered by Delp Drive to the northwest, Detwiler Road to the southwest, and Gehman Road to the southeast. The Facility covers approximately 30 acres. Land use in the surrounding area includes commercial and residential properties. An aerial photograph depicting the location of the Facility and a Site Map are attached to this SB as Figures 1 and 2, respectively.

Prior to 1971, the Facility property was undeveloped and utilized as farmland. Greene Tweed purchased the property in 1971 and began construction of the Facility buildings. Since 1971, Greene Tweed has been the sole owner and operator of the Facility which manufactures specialty seals, gaskets, and custom engineered plastic components for the aerospace, defense, pharmaceutical, and chemical industries. The Facility's main product lines currently include synthetic rubber, PEEK plastic, and plastics machining.

III. Summary of Environmental History

A. Hazardous Waste Activity

On August 15, 1980, the Facility submitted a Notification of Hazardous Waste Activity to EPA which identified the Facility as a generator and treatment, storage and disposal facility (TSDF). On November 17, 1980, the Facility submitted a Part A Hazardous Waste Permit Application to EPA. Subsequently, EPA granted the Facility interim status on July 23, 1981. At that time, hazardous waste managed by the Facility were identified with the following EPA Hazardous Waste Codes: D001 (ignitable), F001 (spent halogenated solvents used in degreasing), F002 (spent halogenated solvents), and F011 (spent cyanide solutions from salt-bath pot cleaning from metal heat-treating operations).

On April 19, 2011, Michael Jr. Baker, Inc. (Baker) conducted an Environmental Indicator (EI) Inspection of Greene Tweed, on behalf of EPA. A representative from EPA was present during the EI Inspection. The findings of the EI Inspection are documented in a December 2011 EI Inspection Report for Greene, Tweed & Co., prepared by Baker. Information gathered during the EI Inspection identified the Facility as a Large Quantity Generator (LQG) of ignitable (D001) hazardous waste.

B. Description of Solid Waste Management Units

EPA has identified the following Solid Waste Management Units (SWMUs) at the Facility based on the Agency's review of available information.

1. SWMU No. 1 – Former Hazardous Waste Storage Area

This unit began operation in 1984 and was located outside the northeast corner of the main building. Hazardous wastes, including Glydex (10% ammonia, 40% ethyl alcohol, 50% water), urethane, and laboratory wastes, were stored in this area in containers. This area also housed a 1,500-gallon aboveground storage tank (AST) used to store waste Glydex. The storage area was 21 by 21 feet concrete pad with a six-inch high curb. The pad area was fenced with a six-foot high chain-link fence with wooden fencing on the northern and eastern faces. In 2002, the footprint of the main building was expanded to the north and the hazardous waste storage area was relocated to the northwest side of the main building. The unit was demolished and the materials of construction were discarded. No known or documented releases have occurred from SWMU No. 1.

2. SWMU No. 2 – Former Methylene Chloride Waste Drum Area

Historically, methylene chloride was used to clean product supply hoses used in the Facility's urethane production process. Waste methylene chloride was collected in a 55-gallon drum located in the urethane production area. Once full, the drum was transferred to SWMU No.1 for off-site shipment. The Facility ceased production of urethane in the early 1990's; therefore, use of methylene chloride and its associated waste drum was discontinued. The dates of operation for this area are unknown. No known or documented releases have occurred from SWMU No. 2.

3. SWMU No. 3 – Current Hazardous Waste Storage Area

The Facility's current hazardous waste storage area is located on the northwest side of the main building and began operation in 2002. The area is 25 by 25-feet and consists of a concrete pad with secondary containment (i.e., concrete berm). A one-foot by one-foot concrete sump is located in the south corner. The concrete floor, curbing, and walls appeared to be epoxy coated and were in good condition. The storage area is under roof, fenced and locked. Containers of waste isopropanol are stored in this area, in addition to waste Glydex which is stored in a 1,500-gallon AST. No known or documented releases have occurred from SWMU No. 3.

4. SWMU No. 4 – Waste Hydraulic Oil/Coolant Storage Area

Located to the east of SWMU No. 3 is the Facility's waste hydraulic oil/coolant storage area. The storage area consists of a sloped 20 by 20-foot concrete pad with a six-inch concrete curb surrounding the back and sides. The storage area is under roof and surrounded by a six-foot high chain-link fence on all sides that is locked. No known or documented releases have occurred from SWMU No. 4.

C. Summary of Environmental Investigations and Remediation

During a 1992 PADEP inspection, the inspector observed a sheen on rain water that had accumulated in the containment area of SWMU No. 2. Facility representatives stated that rain water is drained from the containment area directly to the ground surface. In addition, the inspector observed two large cracks in the concrete pad of SWMU No. 2. Therefore, the inspector requested that soils surrounding and downgradient of the storage area should be sample and analyzed for any waste materials stored in this area. Four soil samples were collected and the results concluded that the soil adjacent to and downgradient of SWMU No. 1 had not been adversely impacted by rainwater runoff from the concrete pad and no further action was required.

In February 2002, the Facility had a 200-gallon release of fuel oil following a refueling event of the Facility's 20,000-gallon UST containing No. 2 fuel oil and a 15,000-gallon UST containing No. 4 fuel oil. The released oil migrated across the asphalt parking lot, into a stormwater sewer drainage pipe, and into a drainage swale located on the north end of the Facility. The initial response to the release included fitting the stormwater sewer drainage pipe with oil-absorbent booms and a settlement basin to act as a temporary oil/water separator to collect any residual oil that could potentially discharge from the storm sewer outlet. Additional booms and spill pads were placed along the impacted drainage swale and waterways. The two USTs were immediately emptied and an environmental firm was hired to conduct emergency spill response.

Following stabilization of the site, the storm sewer was cleaned via a combination vacuum/jet truck equipped with a high-pressure pipe cleaning nozzle to power-wash the interior of the storm sewer while collecting the wash water. The USTs were removed and impacted soil in the vicinity of the USTs was excavated and disposed. Furthermore, approximately 44 tons of impacted soil was excavated from the drainage swale. All remedial activities, including soil and groundwater investigations, were performed in accordance with the Pennsylvania Department of Environmental Protection's (PADEP) Land Recycling Program (Act 2). In May 2009, PADEP

approved the Facility's Act 2 Final Report and stated that the Facility had demonstrated attainment of the residential Statewide Health Standard (SHS) for constituents of No. 2, No. 4 and No. 6 fuel oils for soil within the UST excavation and drainage swale, and for groundwater.

Review of all available records and discussions during an EPA April 19, 2011 site visit indicate that since February 2002 there have been no reportable releases, no instances or evidence of soil or groundwater contamination, no site remediation, and no past, current, or planned monitoring efforts necessary at this Facility. The record review and site visit are documented in the Final Environmental Indicator Inspection Report, prepared by Baker and dated December 2011. All documents on which EPA's proposed decision is based are contained in the AR and available upon request.

IV. 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 March 20, 2012.

V. Public Participation

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 all information considered by EPA in reaching this proposed decision. It is available for public review during normal business hours at:

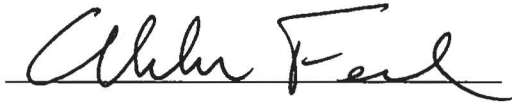
U.S. EPA Region III
1650 Arch Street
Philadelphia, PA 19103
Contact: Jeanna R. Henry
Phone: (215) 814-2820
Fax: (215) 814-3113
Email: henry.jeannar@epa.gov

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 Jeanna R. Henry. EPA will hold a public meeting to discuss this proposed decision upon request. Requests for a public meeting should be made to Jeanna R. Henry.

EPA will respond to all relevant comments received during the comment period. If EPA determines that new information 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 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 Jeanna R. Henry at the address listed above.

Date:

4/27/12



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

Figure 1 – Facility Location Map

Greene, Tweed & Co.
Kulpsville, Pennsylvania
EPA ID NO. PAD980555197



LAT=40° 15'30.64"N
 LON=75° 20'36.27"W



Source: Google maps

SCALE: 1" = 300'
 S.O. NO.: 120678 2070
 DSN/DWN: MM/WUH

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

FIGURE 1
 FACILITY LOCATION MAP
 GREENE, TWEED & CO.
 KULPSVILLE, PENNSYLVANIA

DATE: JANUARY 2012
 FILE: 120678-GTC-01
 CHK: MM

Figure 2 – Site Map

Greene, Tweed & Co.
Kulpsville, Pennsylvania
EPA ID NO. PAD980555197

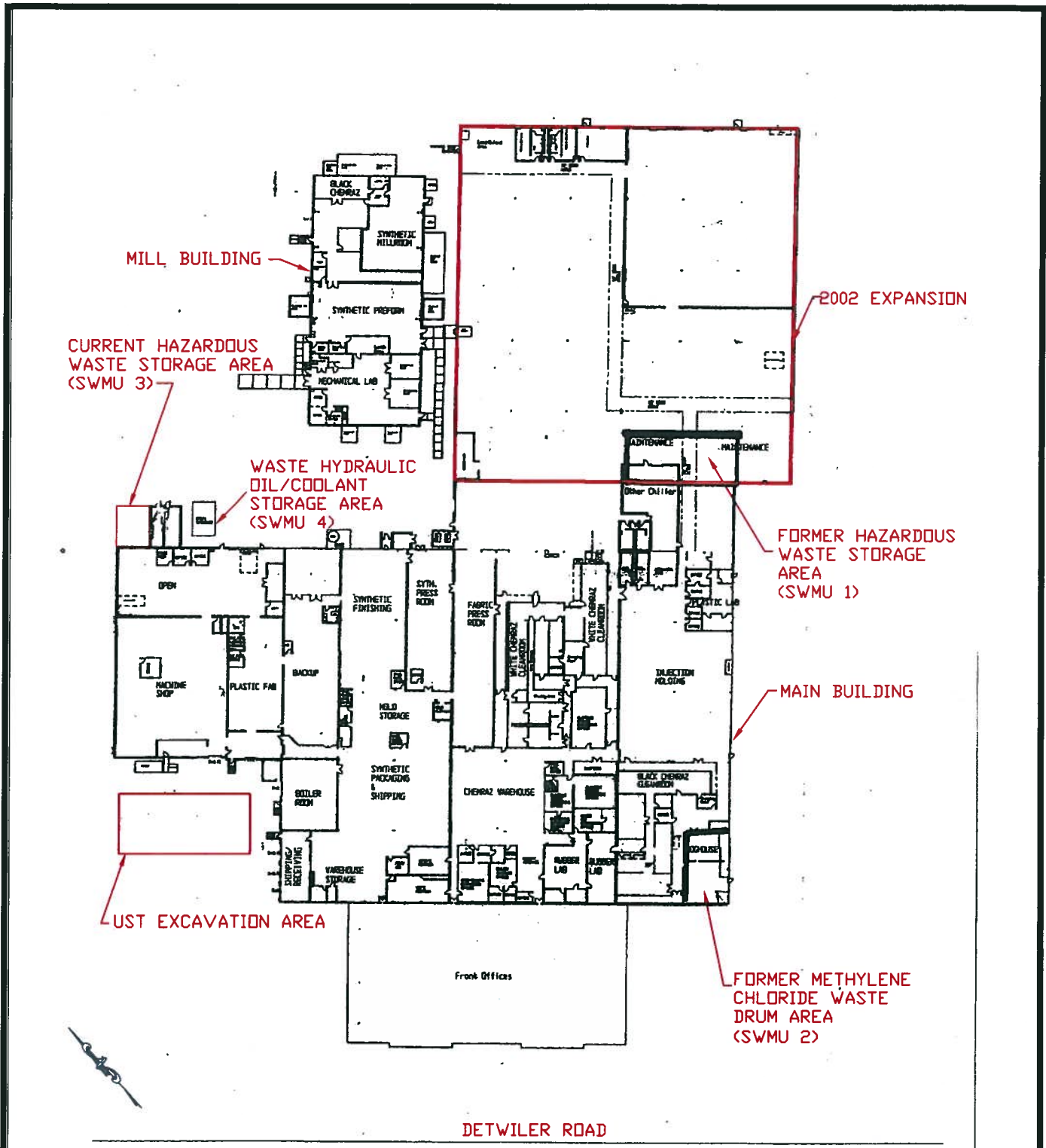


FIGURE 2
 FACILITY LAYOUT SHOWING SWMU LOCATIONS
 GREENE, TWEED & CO.
 KULPSVILLE, PENNSYLVANIA

NOTES:
 1. SWMU AND AOC LOCATIONS BASED ON SITE VISIT, INTERVIEWS AND AVAILABLE INFORMATION
 2. LABELS IN RED ADDED BY BAKER
 SOURCE: GREEN, TWEED & CO.

SCALE: NOT TO SCALE DATE: JANUARY 2012
 S.O. NO.: 120678 FILE: 120678-GTC-07
 DSN/DWN: JBM/RRR CHK: SRF



MICHAEL BAKER JR., INC.
 MOON TOWNSHIP, PENNSYLVANIA