



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III
STATEMENT OF BASIS
FORMER JOHNSON DIVERSEY, INC.
EAST STROUDSBURG, PENNSYLVANIA
EPA ID NO. PAD000736975

I. Introduction

The United States Environmental Protection Agency (EPA) has prepared this Statement of Basis (SB) for the former JohnsonDiversey, Inc. facility located at 1336 (formerly 880) Crowe Road in East Stroudsburg, Pennsylvania 18301 (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, 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.

Due to the operations of former owner/operator JohnsonDiversey, 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 1336 (formerly 880) Crowe Road in East Stroudsburg, Stroud Township, Monroe County, Pennsylvania. The Facility is bordered by railroad tracks to the east, Crowe Road to the west, and Broadhead Creek to the north and west. The Facility covers approximately 43 acres. Land use in the surrounding area is mainly residential and industrial. A Site Location Map and a Site Layout Diagram are included with this SB as Figures 1 and 2, respectively.

In 1968, the Site which was undeveloped at that time, was purchased by Wyandotte Chemical and the existing building was constructed for the production of liquid and powder commercial cleaning products. Facility operations have remained relatively unchanged throughout the years under the previous owners/operators, although from 1992 to 1993, the existing building was renovated to expand the production capacity for liquid products, while the production of powdered products was eliminated. Since 1968, the Facility has been owned and/or operated under the following entities:

- BASF Wyandotte Corporation from January 1969 to April 1980;
- Diversey-Wyandotte from April 1980 to April 1991;
- Diversey Corporation from April 1991 to October 1996;
- DiverseyLever from October 1996 until May 2002;

- JohnsonDiversey, Inc. from May 2002 until November 2006; and
- Royal Chemical Company from November 2006 to the present.

JohnsonDiversey manufactured industrial-grade cleaners, sanitizers, detergents and disinfectants used in the industrial, institutional, and food markets. The manufacturing process included the unloading of raw materials directly into bulk aboveground storage tanks (ASTs) via hard-piped connections; transferring of raw materials into mixers for formulation via aboveground hard-piping from the ASTs and manual loading from drums and other containers; and loading of finished product from the mixer to ASTs or directly into containers for shipment to the customer.

In 2006, the Johnson Diversey's East Stroudsburg, PA facility was acquired by Royal Chemical Company (RCC), a custom chemical compound and contract manufacturer of cleaning products primarily for the Food and Beverage industry and the Commercial Laundry industry. RCC is headquartered in Twinsburg, Ohio. The East Stroudsburg Facility is one of five RCC facilities throughout the continental United States.

III. Summary of Environmental History

In March 1996, Conestoga Rovers and Associates (CRA) completed a Phase I Environmental Site Assessment of the Site, the findings of which are documented in a January 1997 report. Significant findings of the Phase I related to Site conditions included:

- (1) A potential risk for impacts to the Site from nearby properties. Prior to construction of the existing facility in 1968, the extreme southern portion of the Site was used for storage by an adjacent automobile junkyard. To the southeast is the location of the former Drackett facility that produced Drano. Groundwater impacts that affected nearby private drinking water wells have been confirmed in the area of the Drackett facility. It was not known if these impacts extended to the Site.
- (2) The integrity of current and former floor drains, underground piping, and sumps associated with process wastewater management (i.e., process wastewater sewer). Prior to 1992, process wastewater was conveyed to on-site holding and treatment sumps via underground piping. The piping was removed or abandoned in place during the 1992/1993 renovation. However, no information was available regarding the condition of the former underground wastewater piping or any evidence of releases that may have been observed during renovation.
- (3) Stained soils were observed in the vicinity of the diesel fuel and kerosene ASTs dispenser pad.

CRA conducted a Screening Level Phase II ESA at the Site in March 1996 to investigate the findings described above. CRA's activities included installation of test pits around the abandoned process wastewater sewer and diesel fuel and kerosene AST dispenser pad and soil borings through the floor in the area of the former process wastewater piping. In the area of the former process wastewater piping, No. 2 fuel oil was detected at 10 to 50 parts per million (ppm)

in one soil sample. One other sample had volatile organic compound (VOC) readings above background, as measured using a photoionization detector (PID). Diesel fuel was also detected at a concentration of 200 to 500 ppm in one of the samples from a test pit near the AST dispenser pad. No evidence of soil impacts were detected in any of the other samples.

Although no follow-up samples were collected to further evaluate the diesel fuel constituents detected as a result of the March 1996 soil sampling, the two 6,100-gallon diesel fuel and kerosene ASTs were closed in August 2001. The closure included the removal and disposal of the tanks and associated piping. No soil contamination was evident in the areas of the tanks and piping, and groundwater was not encountered during the closure activities. Six confirmatory soil samples were collected from the pipe excavation. Three were sampled for diesel fuel parameters and the other three for kerosene parameters. No contaminants were detected in any of the samples.

In January 2002, another Phase I Environmental Site Assessment (ESA) was conducted at the Site by Environmental Resources Management (ERM) on behalf of Johnson Wax Professional. The findings of the Phase I ESA are documented in a report dated March 27, 2002. The purpose of the Phase I ESA was to identify "recognized environmental conditions" (RECs) and included interviews of Facility personnel, a review of available reports/information, and a visual inspection of the Site. The Phase I ESA concluded that hazardous substances used by the Facility in its production process included acids, caustics, oxidizers, surfactants, phenol, fatty acids inorganic salts, and sanitizers. Facility personnel also stated that hydrofluoric acid, chlorinated solvents, trichloromelamine, isocyanates, and aziridine compounds have not and are not used by the Facility.

RECs identified for the subject site as part of the 2002 Phase I included:

- (1) Previous sampling results (i.e., March 1996 Phase II ESA) indicated that soil had been potentially impacted by VOCs and petroleum hydrocarbons in the former loading/unloading area near the former kerosene and diesel fuel ASTs, and from abandoned process wastewater sewers and underground piping.
- (2) The Facility's 40,000-gallon emergency spill containment vault, which is an underground poured concrete vault that can be used to contain spills or leaks from the Facility's railcar unloading shed and stormwater collection system. The condition of the vault was unknown; however, there have never been reports of spills or leaks directed to the vault.
- (3) Several nearby properties present a potential risk for impacts to the Site. These include the former junkyard located immediately to the south, and a former facility to the southeast operated by Drackett that produced Draino. Groundwater impacts that affected nearby private drinking water wells have been confirmed in the area of the Drackett facility. It was not known if these impacts extended to the Site.

ERM conducted a Phase II ESA of the Site in March 2002. To determine if any potential impacts exist at the Site from underground process wastewater piping and the former production

area, ERM collected five soil samples and three groundwater samples, all of which were analyzed for VOCs, semi-volatile organic compounds (SVOCs) and pH. All VOC and SVOC concentrations detected in the soil and groundwater samples were below PADEPs direct-contact and soil-to-groundwater Medium Specific Concentrations (MSCs) for non-residential sites.

In September 2006, Lender Consulting Services, Inc. (LCS) completed a Business/Lender Phase I ESA on behalf of RCC. LCS recommended a site-wide study to establish a “baseline” of environmental conditions due to the historic and current site uses and the volumes and variety of chemicals used at the Site. In follow-up to LCSs recommendation, EnSafe conducted a Phase II ESA of the Site in October 2006. As part of the Phase II conducted by EnSafe, both soil and groundwater samples were collected to evaluate AOCs not previously investigated (i.e., former junkyard, former Drackett facility, and former diesel AST) and to gather data that could be used to establish “baseline” environmental conditions for Site soil and groundwater. For a Site Layout and Sampling Locations Diagram (Figure 2 – October 2006 Phase II ESA Report), please refer to Figure 2 included with this SB.

Soil samples were collected from soil borings in the area of the former suspected junkyard (soil sample locations B1, B2, B10) area, adjacent to the railcar unloading area (soil sample location B3), north truck door (soil sample location B4), south truck door (soil sample location B8), and former diesel fuel AST (soil sample location B9). Each sample was analyzed for VOCs, SVOCs, metals, nitrate, fluoride, and pH, except for B9, which was only analyzed for VOCs and SVOCs based on the contaminants of concern associated with this location. As shown in Table 1 of the October 2006 Phase II ESA Report, included with this SB as Attachment A, no contaminants were detected in the soil samples above PADEPs residential direct-contact and soil-to-groundwater MSCs.

Eight temporary groundwater monitoring wells were installed in boreholes B1 (south property line), B2 (south property line), B3 (adjacent to railcar unloading area), B5 (downgradient of operations), B6 (downgradient of operations/bulk loading area), B7 (downgradient of operations/10,000-gallon AST), B8 (downgradient of railcar loading area) and B10 (south property line)/downgradient of operations) to depths of approximately 7 to 12 feet below ground surface (bgs) to assess potential impacts to Site groundwater. Groundwater at each well was sampled for VOCs, SVOCs, nitrate, fluoride and total dissolved solids (TDS). Additionally, sodium was analyzed for in groundwater samples collected from B1, B2, and B10.

As shown in Table 3 of the October 2006 Phase II ESA Report, included with this SB as Attachment B, most constituents were either below the detection limit or detected below PADEPs residential used aquifer MSCs. Methylene Chloride was detected in three groundwater samples below the PADEP residential used aquifer MSC of 500 micrograms per Liter ($\mu\text{g/L}$), and in one groundwater sample (B1) equal to the PADEP residential MSC for a used aquifer. However, the laboratory noted that the concentration of methylene chloride detected in the sample is characteristic of a laboratory artifact. In support of the methylene chloride being a potential laboratory contaminant, methylene chloride was not detected in soils at the Site, nor has it historically been used in Facility operations.

Arsenic was reported in the groundwater sample collected from B6 at a concentration of 12.3 $\mu\text{g/L}$, exceeding the PADEP residential MSC of 10 $\mu\text{g/L}$ for used aquifers. EnSafe

concluded that the concentration of arsenic detected in the groundwater may be naturally occurring, or it could be related to the historical use of caustic solutions (e.g., phosphoric acid). Because the arsenic was detected within 12 feet of the ground surface, it is highly unlikely that this shallow groundwater aquifer would be used as a potable source of drinking water

Review of all available records and discussions during an EPA August 7, 2007 site visit indicate that 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 URS and dated November 2007. In addition, EPA gathered supplemental information from RCC in February 2012 regarding past investigations conducted at the site. 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 October 24, 2011.

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

A handwritten signature in black ink, appearing to read "Abraham Ferdas", written over a horizontal line.

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

Figure 1 – Site Location Map

Former Johnson Diversey, Inc.
East Stroudsburg, Pennsylvania
EPA ID NO. PAD000736975

I:\PROJECTS--BST\088803433_ROYAL CHEMICAL\803433B001_SITE LOCATION_ROYAL CHEMICAL.dwg 10/13/2006 2:44:26 PM CST

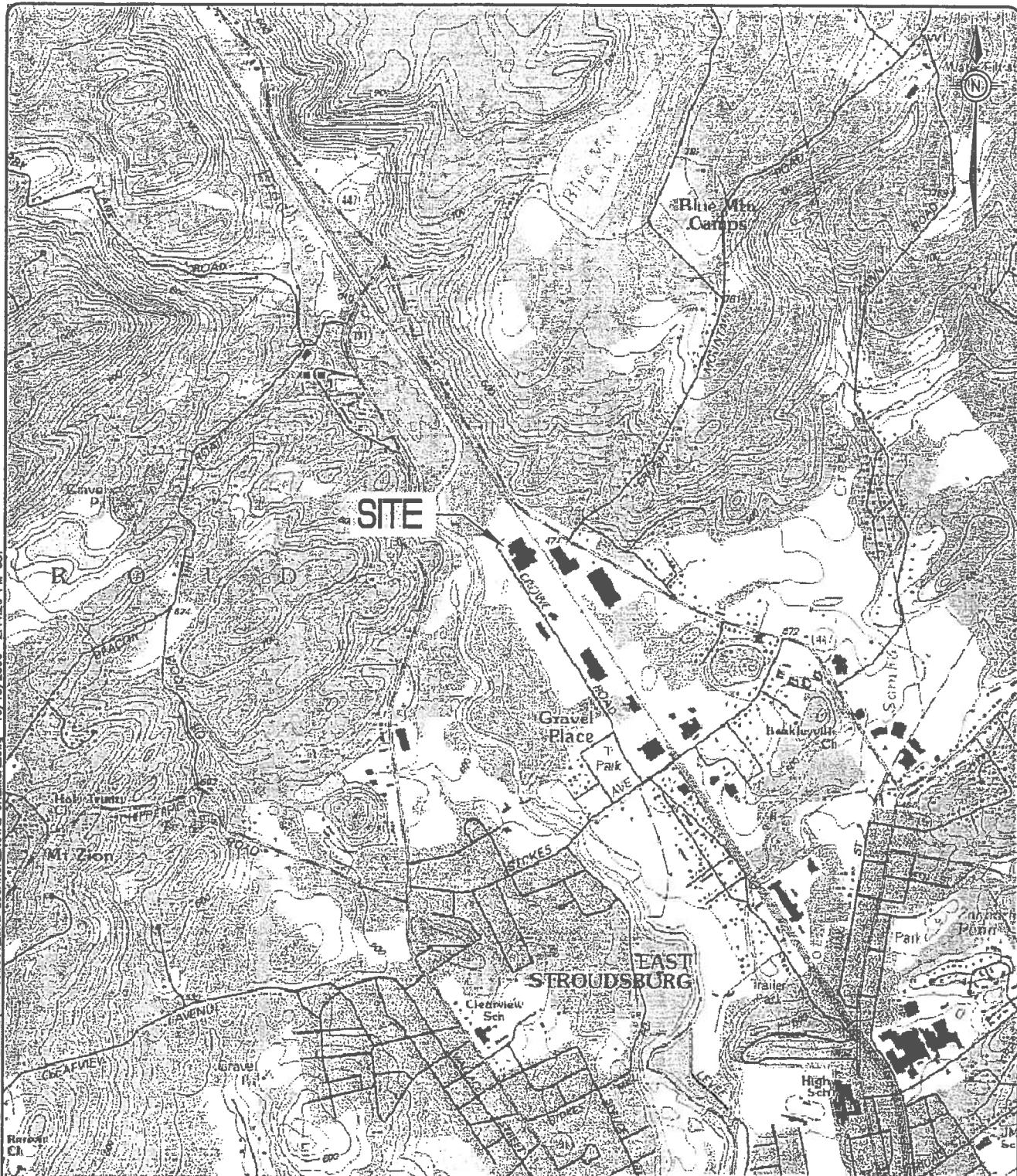


FIGURE 1
SITE LOCATION MAP
ROYAL CHEMICAL
EAST STROUDSBURG, PA

MAP SOURCE:
U.S.G.S. 7.5 MINUTE QUADRANGLE
EAST STROUDSBURG, PA 1993

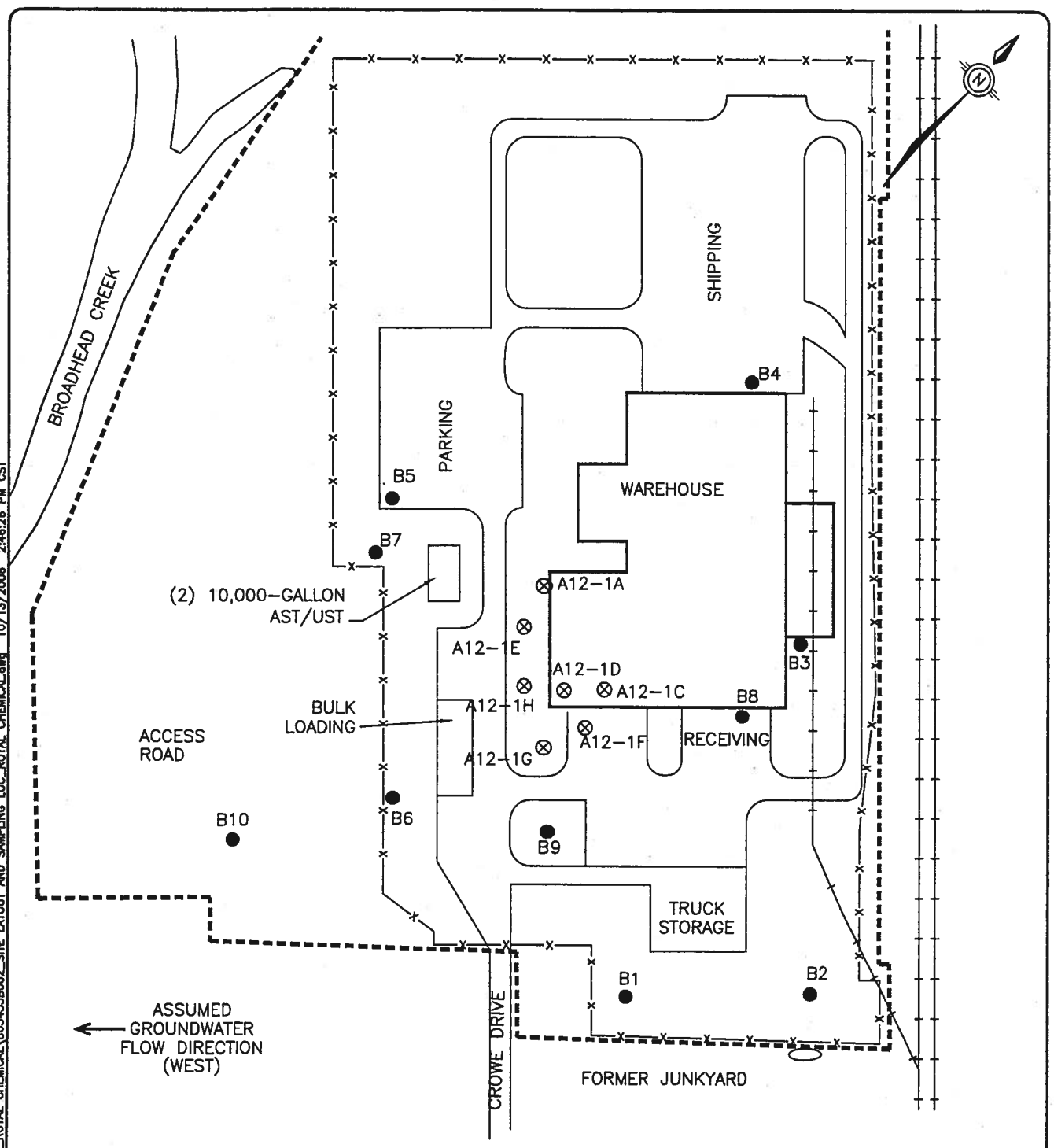
REQUESTED BY: M.SANDER
DRAWN BY: BRONSON
DWG DATE: 10/12/06
DWG NO: 803433B001

ENSAFE
(800) 588-7962
MEMPHIS, TENNESSEE

Figure 2 – Site Layout Diagram & Sampling Locations

Former Johnson Diversey, Inc.
East Stroudsburg, Pennsylvania
EPA ID NO. PAD000736975

I:\PROJECTS-BST\0888803433_ROYAL CHEMICAL\803433B002_SITE LAYOUT AND SAMPLING LOC.ROYAL CHEMICAL.dwg 10/13/2006 2:48:28 PM CST



- LEGEND**
- PROPERTY LINE
 - +— RAILROAD
 - x-x- FENCE
 - ENSAFE GEOPROBE LOCATIONS
 - ⊗ ERM GEOPROBE LOCATION
 - DRUMS/MOTORS

NOT TO SCALE

FIGURE 2
 SITE LAYOUT AND SAMPLING LOCATIONS
 PHASE II INVESTIGATION
 ROYAL CHEMICAL
 EAST STROUDSBURG, PENNSYLVANIA

REQUESTED BY: M.SANDER
DRAWN BY: BRONSON
DWG DATE: 10/11/06
DWG NO: 803433B002

(800) 586-7962
MEMPHIS, TENNESSEE

Attachment A

Table 1 – October 2006 Phase II ESA Report

Former Johnson Diversey, Inc.
East Stroudsburg, Pennsylvania
EPA ID NO. PAD000736975

TABLE 1

ANALYTICAL RESULTS SUMMARY - SOIL SAMPLES

JOHNSON DIVERSEY FACILITY
EAST STROUDSBURG, PENNSYLVANIA

*(Methyl N-butyl)
Ketone*

Sample I.D.	Date	Acetone	Ben-zene	2-Buta- none (MEK)	Carbon Disulfide	2-Hexa- none	4-Methyl-2- pentanone (MIBK)	Toluene	1,1,1- TCA
Standards									
Residential									
Direct Contact (0 - 15 Feet)		10,000	57 41	10,000	10,000	96 100	1,500	10,000 7,600	10,000
Soil to Groundwater									
Used Aquifer - Generic Value		41	0.13	54	160	NA	2.9	44	7.2
Non-Use Aquifer - Generic Value		410	13	5,400	160	NA	290	4,400	72
Non-Residential									
Direct Contact (0 - 2 Feet)		10,000	210	10,000	10,000	100	4,300	10,000	10,000
Direct Contact (2 - 15 Feet)		10,000	240	10,000	10,000	100	4,900	10,000	10,000
Soil to Groundwater									
Used Aquifer - Generic Value		110	0.13	110	350	NA	6.3	44	7.2
Non-Use Aquifer - Generic Value		1,100	13	10,000	350	NA	630	4,400	72
Analytical Laboratory Results									
A12-1A (5')	5/15/2002	0.041	BDL	0.0017	<0.0051	0.0012 J	0.0011 J	BDL	0.0008 J
A12-1E (5')	5/15/2002	0.034	BDL	<0.0046	<0.0046	0.0016 J	0.001 J	BDL	0.0006 J
A12-1F (10')	5/15/2002	0.120	BDL	0.064	0.00101 J	0.018	0.0051	BDL	<0.005
A12-1G (5')	5/15/2002	0.027	BDL	<0.0049	<0.0049	<0.0049	<0.0049	BDL	<0.0049
A12-1H (5')	5/15/2002	0.043	BDL	<0.0055	<0.0055	<0.0055	<0.0055	BDL	<0.0055
B1(0-2) - South Property Line	10/4/2006	<0.100	0.0013	<0.100	<0.015	<0.010	<0.010	<0.002	<0.002
B2(0-2) - South Property Line	10/4/2006	0.140	<0.001	<0.100	<0.015	<0.010	<0.010	<0.002	<0.002
B3(0-2) - Rail Loading	10/4/2006	<0.100	<0.001	<0.100	<0.015	<0.010	<0.010	<0.002	<0.002
B4(3-4) - North Truck Dock	10/4/2006	<0.100	0.0011	<0.100	<0.015	<0.010	<0.010	0.0030	<0.002
B8(2-3) - South Truck Dock	10/4/2006	<0.100	<0.001	<0.100	<0.015	<0.010	<0.010	<0.002	<0.002
B9(2.5-3.5) - Former Diesel AST	10/4/2006	<0.140	0.0015	<0.140	<0.021	<0.014	<0.014	<0.0028	<0.0028
B10(0-2) - South Property Line	10/5/2006	<0.100	<0.001	<0.100	<0.015	<0.010	<0.010	<0.002	<0.002

Notes:

May 2002 samples were collected by ERM

All units in mg/kg (milligrams per kilogram - parts per million)

Standards - PADEP Medium Specific Concentrations (Tables 3 and 4) PA Code Section 250.708

< Value equals analytical detection limit; compound or analyte not detected

BDL - Below detection limits (constituent not reported in ERM data table)

Only analytes detected are presented in analytical summary.

1,1,1-TCA - 1,1,1-Trichloroethane

J - Concentration is an estimated value - below method detection limit

TABLE 1

ANALYTICAL RESULTS SUMMARY - SOIL SAMPLES

JOHNSON DIVERSEY FACILITY
EAST STROUDSBURG, PENNSYLVANIA

Sample I.D.	Date	Bis-(2-ethylhexyl) phthalate	2-Methylnaphthalene	Naphthalene	pH	Fluoride	Nitrate as Nitrogen
<u>Standards</u>							
Residential							
Direct Contact (0 - 15 Feet)		1,300	4,400	4,400	-	-	-
Soil to Groundwater							
Used Aquifer - Generic Value		130	2,900	25	-	-	-
Non-Use Aquifer - Generic Value		6,300	2,900	7,500	-	-	-
Non-Residential							
Direct Contact (0 - 2 Feet)		5,700	10,000	56,000	-	-	-
Direct Contact (2 - 15 Feet)		10,000	10,000	190,000	-	-	-
Soil to Groundwater							
Used Aquifer - Generic Value		130	8,000	25	-	-	-
Non-Use Aquifer - Generic Value		6,300	8,000	7,500	-	-	-
<u>Analytical Laboratory Results</u>							
A12-1A (5')	5/15/2002	<0.350	<0.350	<0.350	7.63	NA	NA
A12-1E (5')	5/15/2002	<0.360	0.077 J	0.0084 J	7.27	NA	NA
A12-1F (10')	5/15/2002	0.077 J	<0.360	<0.360	7.12	NA	NA
A12-1G (5')	5/15/2002	<0.350	<0.350	<0.350	7.24	NA	NA
A12-1H (5')	5/15/2002	<0.350	<0.350	<0.350	7.60	NA	NA
B1(0-2) - South Property Line	10/4/2006	<0.393	<0.393	<0.393	7.40	<1.00	2.40
B2(0-2) - South Property Line	10/4/2006	<0.344	<0.344	<0.344	7.80	2.10	1.70
B3(0-2) - Rail Loading	10/4/2006	<0.349	<0.349	<0.349	8.00	<1.00	3.90
B4(3-4) - North Truck Dock	10/4/2006	<0.348	<0.348	<0.348	7.30	1.90	<1.00
B8(2-3) - South Truck Dock	10/4/2006	<0.336	<0.336	<0.336	8.10	1.20	2.20
B9(2.5-3.5) - Former Diesel AST	10/4/2006	<0.460	<0.460	<0.460	NA	NA	NA
B10(0-2) - South Property Line	10/5/2006	<0.361	<0.361	<0.361	6.8	<0.100	<0.100

Notes:

May 2002 samples were collected by ERM

All units in mg/kg (milligrams per kilogram - parts per million)

Standards - PADEP Medium Specific Concentrations (Tables 3 and 4) PA Code Section 250.708

< Value equals analytical detection limit; compound or analyte not detected

BDL - Below detection limits (constituent not reported in ERM data table)

Only analytes detected are presented in analytical summary.

1,1,1-TCA - 1,1,1-Trichloroethane

J - Concentration is an estimated value - below method detection limit

TABLE 1

ANALYTICAL RESULTS SUMMARY - SOIL SAMPLES

JOHNSON DIVERSEY FACILITY
EAST STROUDSBURG, PENNSYLVANIA

Sample I.D.	Date	Arsenic	Barium	Cadmium	Chromium (III / VI)	Lead	Silver
Standards							
Residential							
Direct Contact (0 - 15 Feet)		12	44,000 15,000	110 47	6160 190,000 / 94	500	1,100
Soil to Groundwater							
Used Aquifer - Generic Value		29 150	8,200	38	190,000 / 190	450	84
Non-Use Aquifer - Generic Value		150,000	190,000	38,000	190,000	190,000	84,000
Non-Residential							
Direct Contact (0 - 2 Feet)		53	190,000	210	190,000 / 420	1,000	14,000
Direct Contact (2 - 15 Feet)		190,000	190,000	190,000	190,000	190,000	190,000
Soil to Groundwater							
Used Aquifer - Generic Value		150	8,200	38	190,000	450	84
Non-Use Aquifer - Generic Value		150,000	190,000	38,000	190,000	190,000	84,000
Analytical Laboratory Results							
A12-1A (5')	5/15/2002	NA	NA	NA	NA	NA	NA
A12-1E (5')	5/15/2002	NA	NA	NA	NA	NA	NA
A12-1F (10')	5/15/2002	NA	NA	NA	NA	NA	NA
A12-1G (5')	5/15/2002	NA	NA	NA	NA	NA	NA
A12-1H (5')	5/15/2002	NA	NA	NA	NA	NA	NA
B1(0-2) - South Property Line	10/4/2006	6.70	60.7	<1.22	10.6	42.4	<1.22
B2(0-2) - South Property Line	10/4/2006	9.86	54.6	<1.05	12.3	27.2	<1.05
B3(0-2) - Rail Loading	10/4/2006	6.89	49.1	1.41	11.3	38.4	3.42
B4(3-4) - North Truck Dock	10/4/2006	6.18	54.3	1.24	18.5	6.53	<1.07
B8(2-3) - South Truck Dock	10/4/2006	9.76	20.4	1.22	20.5	15.2	1.86
B9(2.5-3.5) - Former Diesel AST	10/4/2006	NA	NA	NA	NA	NA	NA
B10(0-2) - South Property Line	10/5/2006	2.20	46.1	<1.10	8.01	6.91	<1.10

Notes:

May 2002 samples were collected by ERM

All units in mg/kg (milligrams per kilogram - parts per million)

Standards - PADEP Medium Specific Concentrations (Tables 3 and 4) PA Code Section 250.708

< Value equals analytical detection limit; compound or analyte not detected

BDL - Below detection limits (constituent not reported in ERM data table)

Only analytes detected are presented in analytical summary.

1,1,1-TCA - 1,1,1-Trichloroethane

J - Concentration is an estimated value - below method detection limit

Attachment B

Table 3 – October 2006 Phase II ESA Report

Former Johnson Diversey, Inc.
East Stroudsburg, Pennsylvania
EPA ID NO. PAD000736975

TABLE 3

ANALYTICAL RESULTS SUMMARY - GROUNDWATER SAMPLES

JOHNSON DIVERSEY FACILITY
EAST STROUDSBURG, PENNSYLVANIA

Sample I.D.	Sample Date	Acetone	Chloroform	Methylene Chloride	Toluene	Bis(2-ethylhexyl) phthalate	Fluoride	TDS	Nitrate as Nitrogen	Arsenic	Barium	Sodium
Standards												
Residential												
Used Aquifer, TDS <= 2,500 Mg/L	-	370.0	0.080	0.005	1.00	0.006	-	-	10.0	0.010	2.0	-
Non-Use Aquifer	-	370.0	0.800	0.500	100.00	0.290	-	-	10,000.0	1.00	2,000.0	-
Non-Residential												
Used Aquifer, TDS <= 2,500 Mg/L	-	10.00	0.080	0.005	1.00	0.006	-	-	10.0	0.010	2.0	-
Non-Use Aquifer	-	100.0	0.800	0.500	100.0	0.290	-	-	10,000.0	1.00	2,000.0	-
Maximum Contaminant Level (MCL)	-	-	-	0.005	1.00	-	4,000	-	10.0	0.010	2.0	-
Secondary MCL	-	-	-	-	-	-	2,000	500,000	-	-	-	-
Analytical Laboratory Results												
A12-1A (8')	5/15/2002	BDL	<0.0002	BDL	<0.0002	0.0012 B	NA	NA	NA	NA	NA	NA
A12-1E (9')	5/15/2002	BDL	<0.0002	BDL	<0.0002	0.0007 B	NA	NA	NA	NA	NA	NA
A12-1H (9')	5/15/2002	BDL	0.0004	BDL	0.0014	0.0012 B	NA	NA	NA	NA	NA	NA
B1	10/4/2006	<0.050	<0.002	0.005 A	<0.002	<0.00943	0.360	101	0.328	<0.010	0.0133	18.2
B2	10/4/2006	<0.050	<0.002	0.002 A	<0.002	<0.00943	<0.100	106	0.272	<0.010	0.0127	15.6
B5	10/4/2006	<0.050	<0.002	<0.002	<0.002	<0.00943	<0.100	52	0.156	<0.010	0.0133	NA
B6	10/4/2006	0.200	<0.002	0.0034 A	<0.002	<0.010	0.720	410	0.181	0.0123	0.0436	NA
B7	10/4/2006	<0.050	<0.002	<0.002	<0.002	<0.00943	0.120	68.6	0.297	<0.010	0.0146	NA
B8	10/4/2006	<0.050	<0.002	0.0036 A	<0.002	<0.00943	0.110	172	0.240	<0.010	0.0147	NA
B10	10/5/2006	<0.050	<0.002	<0.002	<0.002	<0.00980	0.130	68.0	0.289	<0.010	0.0120	10.3

Notes:

All units in mg/L (milligrams per liter - parts per million)
 Regulatory Standards are Pennsylvania DEP Medium Specific Concentrations (Tables 1 and 2) in PA Code Section 250.70E
 May 2002 samples collected by ERM
 TDS - Total Dissolved Solids
 < - Value equals analytical detection limit; compound or analyte not detected
 Only analytes detected are presented in analytical summary.
 A - Laboratory flag stating: "concentration of the analyte...is characteristic of a laboratory artifact."
 B - Analyte also reported in associated laboratory blank samples
Bold - Value equals or exceeds drinking water standard