



UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION III

STATEMENT OF BASIS

KNOLL, INC.  
EAST GREENVILLE, PENNSYLVANIA

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

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## Section 1: Introduction

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The United States Environmental Protection Agency (EPA) has prepared this Statement of Basis (SB) to solicit public comment on its proposed decision for the Knoll, Inc. facility located at 1235 Water Street, East Greenville, Montgomery County, Pennsylvania 18041 (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

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The Knoll, Inc. facility is an approximately 99-acre parcel located approximately 13 miles south of Allentown in the northern section of Upper Hanover Township, Pennsylvania.

The Facility is bound by Gravel Pike to the east and Water Street and Perkiomen Creek to the west. A pond/wetland area and a few scattered residences are located north of the Facility. Several other light industrial facilities are located south of the Facility. A location map and a Facility layout are attached as Figures 1 and 2, respectively.

The Facility was built in 1964 to manufacture office furniture, partitions, fixtures, and office systems. Prior to 1964 the area had been used as farmland. The fabrication building housed the following processes: paint spray booths, wood working, metal working, laminating, packaging, metal degreasing, paint stripping, panel fabrication, and design development. Additions to the Facility have included a small wastewater treatment plant in 1972, a 140,000-square-foot warehouse (the Schlosser building) in 1985, and a 325,000-square-foot assembly facility (the Lubin building) in 1986.

Knoll has been owned by General Felt Industries (1964-1990), Westinghouse Acquisition Corporation (1990-1995), and T.K.G. Acquisition Corporation (purchased December 15, 1995). Knoll became incorporated on December 15, 1995. Although ownership of the Facility has changed over time, it has always produced office furniture, partitions, fixtures, and office systems.

### Section 3: Summary of Environmental History

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A 1989 Preliminary Assessment identified eight Solid Waste Management Units (SWMUs) at the Facility. A 2008 Environmental Indicator (EI) Inspection Report presented updated information on these eight SWMUs, in addition to identifying several underground storage tank (UST) removals and other remedial efforts undertaken at the Facility. The table below describes the SWMUs as well as the 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 identified by the EI report at the Facility. Target screening levels were determined to be EPA Region 3's Residential Regional Screening Levels (RSLs) for Volatile Organic Compounds (VOCs), Semi-Volatile Organic Compounds (SVOCs), and metals in soil; and EPA's Maximum Contaminant Level (MCL) national primary drinking water standards for VOCs and metals in groundwater.

<b>SWMU</b>	<b>Description</b>	<b>Current status</b>
Wastewater Treatment Plant (WWTP)	Located near western border of property; treats all Facility effluents and discharges to Perkiomen Creek under NPDES permit	No evidence of spills or releases observed or reported
Lime Sludge Pits	Two outdoor 10,000-gallon and two indoor 7000-gallon pits treat wastewater from metal-phosphatizing areas; one indoor pit decommissioned in 1993	No evidence of spills or releases observed or reported
Former Drum Storage Area	Stored hazardous wastes on sloping concrete pad with drain that discharged to lime sludge pits; replaced in 1993 with Hazardous Materials Drum Storage building	No evidence of spills or releases observed or reported
Empty Container Area	Stores empty paint containers which have no waste codes and drummed non-hazardous wastes	No evidence of spills or releases observed or reported
Former 3000-gallon Hazardous Waste UST	Installed in 1984 along southwestern wall and stored methylene chloride-contaminated wastewater; removed in 1995	VOCs and metals are below EPA's soil RSLs
Former Incinerator	Installed in 1974 and permitted to burn combustible materials and oil paint sludge; dismantled in 2002	No evidence of spills or releases observed or reported
Sawdust Collector	Located outside northwestern and western walls to collect sawdust from wood cutting operations	No evidence of spills or releases observed or reported

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Trash Compactor	Stores all incombustible non-hazardous wastes and unusable wood trimmings	No evidence of spills or releases observed or reported
Former 10,000-gallon #2 Fuel Oil Tank	Located south of the sawdust collection shed and used to fuel burners for incinerator; removed in 1988 along with 80 tons of contaminated soil	Two composite soil samples collected; excavation backfilled with clean fill
Former 550-gallon #2 Fuel Oil Tank	Located near WWTP and used to fuel emergency generator; removed in 1990 along with 18 cubic yards of contaminated soil	Metals are below EPA's soil RSLs
Former 2000-gallon Unleaded Gasoline Tank	Located near southern wall and used to refuel lawn/maintenance equipment; removed in 1989 along with 23 cubic yards of contaminated soil	Benzene, toluene, ethylbenzene, xylenes (BTEX) and metals are below EPA's soil RSLs
Former 20,000-gallon #4 Fuel Oil Tank	Installed in 1970 along southwestern wall near boiler room; removed in 1991 along with 415 tons of contaminated soil	BTEX are within EPA's RSLs risk range for soil; metals are below EPA's soil RSLs
Former 275-gallon #2 Fuel Oil Tank	Located near the WWTP; removed in 1996	SVOCs are below EPA's soil RSLs
Facility Groundwater	Network of seven monitoring wells installed between 1989 and 1995 covering the downgradient perimeter of building (southern and western walls)	VOCs are below EPA's soil RSLs

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 risks to human health or the environment for any use at this Facility.

## Section 4: Environmental Indicators

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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 July 31, 2012.

## Section 5: Public Participation

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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](mailto: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: 8/21/12

/Abraham Ferdas/

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

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## Index to Administrative Record

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Report on the Abandonment of the 10,000-gallon “Incinerator” Tank and Related Excavation and Removal of Contaminated Soils, prepared by the Almega Corporation, August 10, 1988.

Environmental Priorities Initiative Preliminary Assessment of Knoll International, prepared by NUS Corporation, October 2, 1989.

Closure by Removal of One 550-gallon Fuel Oil UST and One 2000-gallon Gasoline UST, prepared by Dan Shannon Engineering, April 1990.

Closure by Removal of One 20,000-gallon Fuel Oil UST, prepared by Dan Shannon Engineering, September 1991.

Report on Hydrogeologic Investigation for the Possible Contamination of Groundwater by a Leaky UST, prepared by Almega Environmental Services, February 24, 1993.

3000-gallon Hazardous Waste UST Removal, prepared by BKG Company, May 12, 1995.

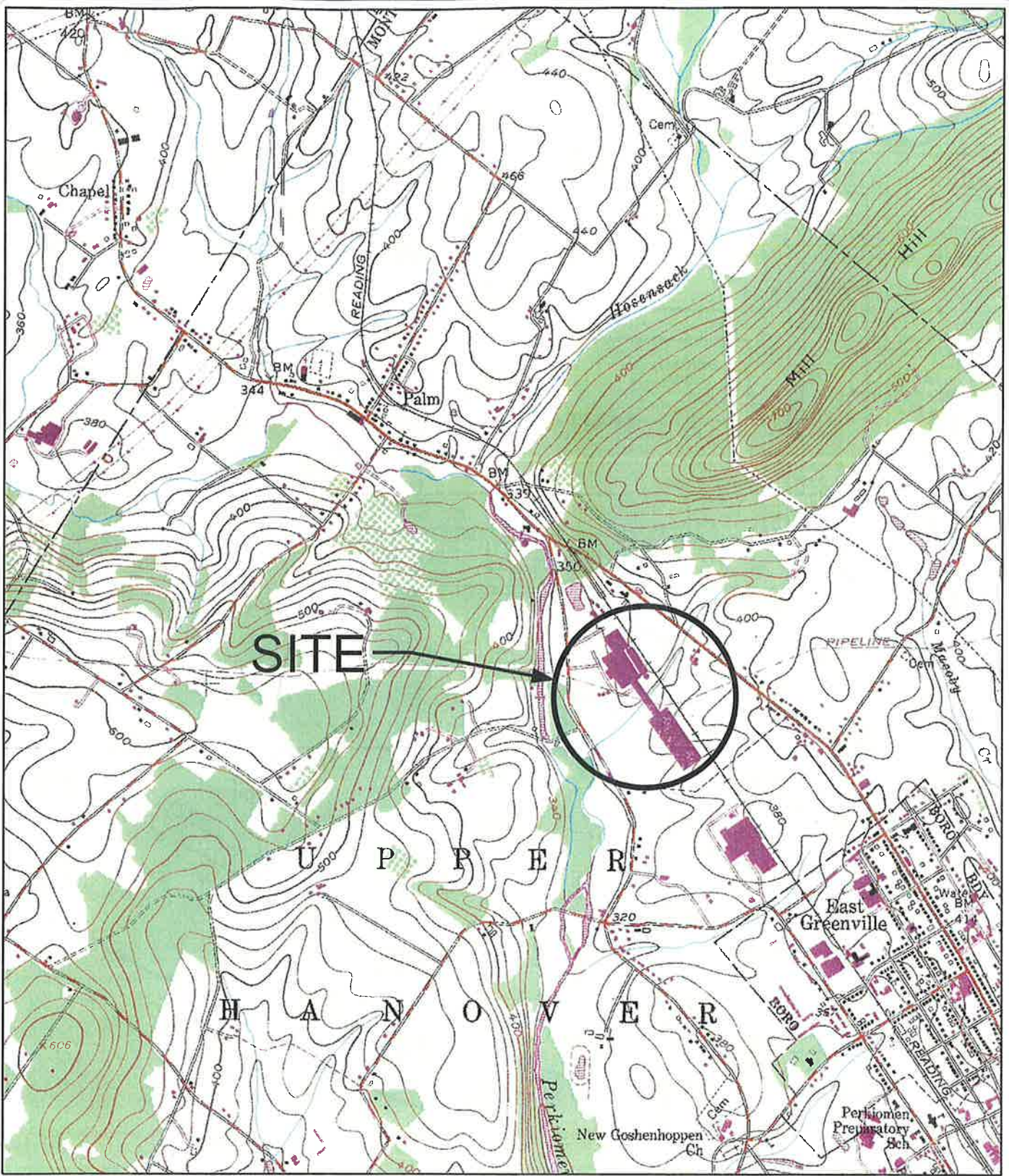
Hydrogeologic Study Report, prepared by Environmental Services of America, June 29, 1995.

Hydrogeologic Investigation Report, prepared by Northeast Environmental Services, December 11, 1995.

Closure by Removal of One 275-gallon UST, prepared by BKG Company, November 27, 1996.

Environmental Indicator Inspection Report for Knoll International, 1235 Water Street, East Greenville, Pennsylvania 18041, prepared by URS, February 2008.





SITE



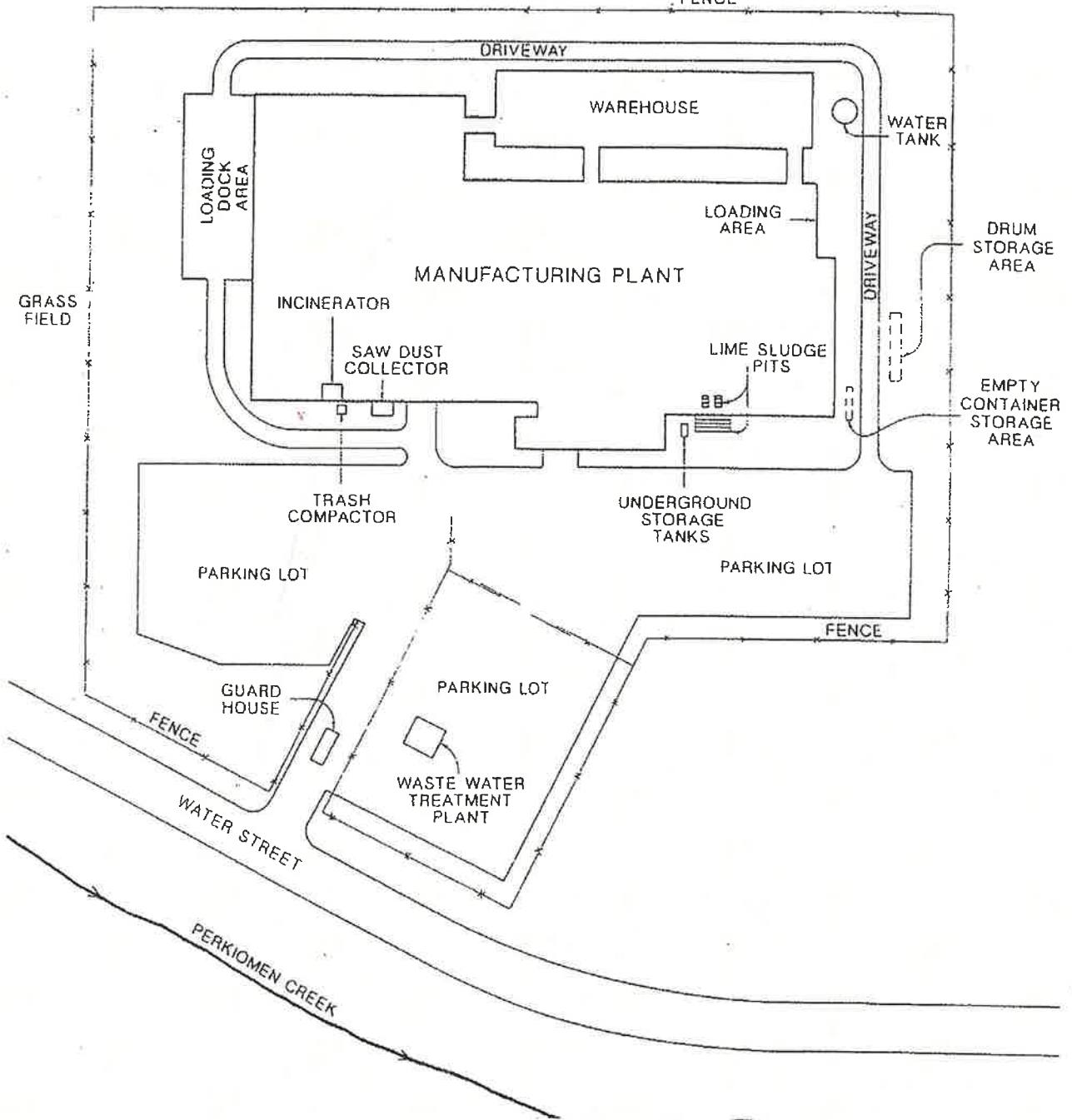
REFERENCE:  
A Portion of USGS 7.5 Minute Topographic Map;  
East Greenville Quadrangle, Pennsylvania 1956,  
Photorevised 1969 & 1973.

TITLE			
SITE LOCATION MAP			
PROJECT			
Knoll Incorporated, 1235 Water Street East Greenville, Pennsylvania			
		4507 NORTH FRONT STREET, SUITE 200 HARRISBURG, PENNSYLVANIA 17110 (717) 635-7901 FAX (717) 635-7902 www.urscorp.com	
SCALE	AS SHOWN	OWN. BY	AWJ
DATE	9/25/07	APPR. BY	TME
		JOB NO.	20497788
		FIG. NO.	1




R.R. TRACKS

FENCE



NOTE: THIS DRAWING IS NOT TO SCALE

TITLE	AREAS OF CONCERN DURING THE FIT PROGRAM		
PROJECT	Knoll Incorporated, 1235 Water Street East Greenville, Pennsylvania		
	 4507 NORTH FRONT STREET, SUITE 200 HARRISBURG, PENNSYLVANIA 17110 (717) 635-7901 FAX (717) 635-7902 www.urscorp.com		
SCALE	N.T.S.	DWN. BY	JAK
DATE	9/28/07	APPR. BY	JAK
		JOB NO.	20497788
		FIG. NO.	4

REFERENCE:  
 ENVIRONMENTAL PRIORITIES INITIATIVE PRELIMINARY  
 ASSESSMENT BY NUS CORPORATION 10/02/89

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