



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III

STATEMENT OF BASIS

FORMER GE SKEATS HIGH POWER LABORATORY

7500 Lindbergh Boulevard
Philadelphia, Pennsylvania

EPA ID NO. PAD075527804

Prepared by
Office of Pennsylvania Remediation
Land and Chemicals Division
August 2016

Table of Contents

Section 1: Introduction	1
Section 2: Facility Background	2
Section 3: Summary of Environmental Investigations	2
Section 4: Corrective Action Objectives	6
Section 5: Proposed Remedy	6
Section 6: Evaluation of Proposed Remedy	7
Section 7: Public Participation	9
Section 8: Index to Administrative Record	10

List of Acronyms

AOC	Areas of Concern
AR	Administrative Record
AST	Above Ground Storage Tank
COC	Contaminants of Concern
EPA	Environmental Protection Agency
FDRTC	Final Decision Response to Comments
GPRA	Government Performance and Results Act
MCL	Maximum Contaminant Level
MSC	Medium Specific Concentration
PADEP	Pennsylvania Department of Environmental Protection
RCRA	Resource Conservation and Recovery Act
RSL	Regional Screening Level
SB	Statement of Basis
TSCA	Toxic Substances Control Act
USPS	United States Postal Service
UST	Underground Storage Tank
VOC	Volatile Organic Compound

Section 1: Introduction

The United States Environmental Protection Agency (EPA) has prepared this Statement of Basis (SB) to solicit public comment on its proposed remedy for the former General Electric Skeats High Power Laboratory Plant (GE Skeats) located in Philadelphia, Pennsylvania (hereinafter referred to as the Facility or Site). EPA's proposed remedy for the Facility consists of maintenance of a capped area as well as compliance with and maintenance of land-use restrictions to be implemented through institutional controls. This SB highlights key information relied upon by EPA in proposing its remedy for the Facility.

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.

EPA is providing a thirty (30) day public comment period on this SB. EPA may modify its proposed remedy based on comments received during this period. EPA will announce its selection of a final remedy for the Facility in a Final Decision and Response to Comments (Final Decision) after the public comment period has ended.

Information on the Corrective Action program as well as a fact sheet for the Facility can be found by navigating <http://www.epa.gov/reg3wcmd/correctiveaction.htm>.

The Administrative Record (AR) for the Facility contains all documents, including data and quality assurance information, on which EPA's proposed remedy is based. See Section 8, Public Participation, below, for information on how you may review the AR.

Section 2: Facility Background

The former GE Skeats facility was located at 7500 Lindbergh Boulevard in Philadelphia, Pennsylvania, on a 27-acre property located approximately 2 miles north of the Philadelphia International Airport. Several buildings and supporting structures performed various functions as part of the testing operations from approximately 1951 until 1989. Buildings on the site when owned by GE have been demolished. Past operations conducted by GE included load testing of circuit breakers, fuses, disconnects, switch gears, transformers, etc. These electric transformers contained dielectric fluids with PCBs. No manufacturing was conducted at this site.

Currently, the property is occupied by a United States Postal Service (USPS) processing and distribution center building occupying approximately 927,000 square feet (21 acres) of the property. The construction of the USPS facility was completed in November 2005 and became operational in approximately January 2006. The USPS property is approximately 50 acres, due to the acquisition of the property located at 7150 Lindbergh Boulevard formerly owned by the Penn Bottle Company (as a parking area for USPS vehicles) and a portion of the Singer Equipment Company (Singer) located northeast of the USPS property.

GE Skeats was regulated under EPA's Resource Conservation and Recovery Act (RCRA) Corrective Action Program, as it stored hazardous waste during its operation. However, Penn Bottle and Singer Corporation were not regulated under the RCRA Program, as they did not treat, store or dispose of hazardous waste. Penn Bottle, however, was regulated by PADEP for their underground storage tanks. Therefore, this SB and its discussion of investigation and remediation is specific to the former GE facility and does not include discussion of the Penn Bottle or Singer sites.

Section 3: Summary of Environmental Investigations

3.1 Environmental Investigations and Remedial Activities Completed

The former GE Skeats High Power Laboratory property is now part of the Philadelphia Processing and Distribution Center of the USPS in Philadelphia, PA. The GE Skeats buildings have been demolished. Past operations conducted at GE Skeats included load testing of electric transformers containing dielectric fluids with PCBs.

Three primary environmental investigations were completed at GE Skeats between 1990 and 2003, encompassing soil and groundwater. EPA is basing its proposed remedy on these environmental investigations which followed guidelines laid out in the Pennsylvania Department of Environmental Protection (PADEP) Land Recycling Program (Act 2) Technical Guidance Manual. EPA has used the EPA Regional Screening Level (RSL) values to determine

Statement of Basis

Former GE Skeats High Power Laboratory

August 2016

compliance with cleanup under the RCRA Corrective Action program.

GE and USPS investigated and remediated the polychlorinated biphenyls (PCBs) in accordance with the Self-Implemented Remediation Program contained in EPA's Toxic Substances Control Act (TSCA) regulations under 40 CFR 761.61.

3.1.1 Soil Investigation

Three main environmental investigations and clean-up activities were completed at the site between 1990 and 2003; 1990 investigations and soil removal focused on underground storage tanks; 1998-1999 activities involved site-side soil and groundwater; and 2003 work concentrated on additional PCB cleanup. The 1999 Phase II Environmental Site Assessment Report documented that 475 tons of petroleum-impacted soil had been removed. The Phase II also identified the areas where soil samples exceeded the RSLs for non-residential direct contact with soils (see Table below). The contaminants were only found in shallow soil, and their screening values are: benzo(a)anthracene (*2.9mg/kg*), benzo(a)pyrene (*0.29mg/kg*), arsenic (*3mg/kg*), and lead (*800mg/kg*),

A total of 99 soil samples were taken within the site in 1998 and 1999. Of the 99 samples, analytical results show only six (6) sample locations slightly exceeding EPA's RSLs. These exceedances were only found at shallow depth indicating there is no widespread distribution of any contaminants. The site-wide average concentrations of all constituents are below EPA's RSLs for non-residential direct contact.

Soil Exceedances of Direct Contact RSLs

Building 23A Spill Area -Benzo(a)anthracene (<i>2.9mg/kg</i>), 5.3mg/kg -Benzo(a)pyrene (<i>0.29mg/kg</i>), 4.8 mg/kg -Arsenic (<i>3mg/kg</i>), 5.8	Purported Burial Area 2 -Benzo(a)anthracene (<i>2.9mg/kg</i>), 24mg/kg -Benzo(a)pyrene (<i>0.29 mg/kg</i>), 22mg/kg -Arsenic (<i>3mg/kg</i>), 4.1mg/kg, 5.7mg/kg, 140mg/kg -Lead (<i>800mg/kg</i>), 1040mg/kg
Former Stormwater System -Benzo(a)anthracene (<i>2.1mg/kg</i>), 26mg/kg -Benzo(a)pyrene (<i>0.21 mg/kg</i>), 2.4mg/kg -Arsenic (<i>1.6mg/kg</i>), 6.3mg/kg	

Statement of Basis

Former GE Skeats High Power Laboratory
 August 2016

3.1.2. Groundwater Investigation

Twenty (20) monitoring wells were installed throughout the GE Skeats property to assess groundwater quality over three main sampling rounds, in addition to hydropunches used intermittently. The 1999 Request for Non-Use Aquifer Determination (NUAD), and the 1999 Phase II Environmental Site Assessment Report identified several contaminants found in the groundwater above EPA's residential screening values used to evaluate data: the Maximum Contaminant Level (MCL) for drinking water or the EPA RSL standard for tap water.

The contaminants found in groundwater in the most recent sampling effort in 1999 were: tetrachloroethylene (PCE) (*MCL=5ug/l*), trichloroethylene (TCE) (*MCL=5ug/l*), benzene (*MCL=5ug/l*), naphthalene (*tap water=0.17ug/l*), chromium (*MCL=100ug/l*), and manganese (*tap water=430ug/l*). Primarily, these contaminants were found at levels slightly exceeding their screening values. Only benzene (1 samples), TCE (1 sample), naphthalene (1 sample), chromium (1 sample) and manganese (1 sample) were found at more increased concentrations and only very localized. There is no widespread distribution of any contaminants. No detection of these contaminants has been found at the downgradient or perimeter wells, which indicates contamination is not migrating. For all contaminants other than TCE, the site-wide average concentrations are well below EPA's MCLs and RSLs for tap water. Average site-wide TCE concentration is 10 ug/l, which is only slightly above EPA's MCL standard of 5 ug/l.

Organic contaminants (VOCs and SVOCs) were found in the site soils and groundwater, in and near the location of the new Processing Center building. EPA evaluated the site data for potential vapor intrusion into the interior of the building. Based on the information contained in the May 1999 Request for Non-Use Aquifer Determination (NUAD) and the 1999 Phase II Environmental Site Assessment Report, the indoor air within the Processing Center and neighboring properties is not suspected to be impacted by VOC/SVOC contamination remaining in the site soils and groundwater.

Groundwater exceedances of MCLs and tap water standards

Stormwater and Septic Systems - TCE (<i>5ug/l</i>), 12, 210 ug/l - Manganese (<i>430ug/l</i>), 3030 ug/l	Hazardous Waste Storage Area - Chromium (<i>100ug/l</i>), 410 ug/l
Two, 5,000 Gallon USTs North of Building 20 - Benzene (<i>5ug/l</i>), 22 ug/l - Naphthalene (<i>0.17ug/l</i>), 40 ug/l	Transil Oil Distribution System - TCE (<i>5ug/l</i>), 8 ug/l
Building 22 A Subsurface Spill - PCE (<i>5ug/l</i>), 12 ug/l	

Statement of Basis

3.1.3. PCB Investigation

As GE Skeats's primary operations involved PCB-containing fluids, separate investigations were performed to address characterization and remediation of the PCB-related contamination.

In 1999, in Buildings 20, 22, 22A, and 23, the concrete walls, ceilings and floors were cleaned of PCBs to meet the facility-chosen criteria of 4ppm, under the Self-Implemented Cleanup Standard of TSCA. The buildings and structures were then demolished and the crushed concrete used for on-site fill under the new building. Any material which did not meet criteria was disposed of off-site in approved landfills. In addition, the PCB-impacted pre-gale oil separator, portions of the high yard drainage, the cap yard and test cells were disposed of off-site as PCB-contaminated waste.

In 2003, additional investigation was conducted for impacted soils near former Building 20. A total of 672.22 tons of soil was excavated and removed off-site. Post-excavation sampling was conducted throughout the excavation. All post-excavation samples were below 10ppm for PCBs, the facility-chosen screening criteria selected for the site. EPA's TSCA program in November 2003 determined that clean-up efforts were sufficient and required no further action.

Under TSCA site clean-up regulations, soils and crushed concrete may be left on site provided the PCB concentration is below 10ppm in all samples and the area is under a cap of at least 10 inches of soil or 6 inches of concrete/asphalt. For this site, the cover is provided by a portion of the new building foundation and adjacent parking lots.

3.2 Environmental Indicators

Under the Government Performance and Results Act ("GPRA"), EPA has set national goals to address RCRA corrective action facilities. Under GPRA, EPA evaluates two key environmental clean-up indicators for each facility: (1) Current Human Exposures Under Control, and (2) Migration of Contaminated Groundwater Under Control. The Parcel met the goals for both of these indicators on March 28, 2013.

Section 4: Corrective Action Objectives

EPA's Corrective Action Objectives for the specific environmental media at the Parcel are the following:

1. Soils

EPA has determined that EPA's RSLs for industrial use are protective of human health and the environment.

2. Groundwater

EPA has determined that EPA's drinking water standard, otherwise known as MCLs, or the relevant tap water standards are protective of human health and the environment.

TCE is the only contaminant that, site-wide, slightly exceeds its applicable MCL in Facility groundwater. TCE is very localized and MCLs have been met at the downgradient and perimeter wells. EPA has determined that the Corrective Action Object for groundwater has been met.

Section 5: Proposed Remedy

Introduction

Under this proposed remedy, some contaminants remain in the soil above levels consistent with unrestricted uses. EPA's proposed remedy requires that an existing cap be maintained over the areas with residual PCBs, specifically the footprints of former Buildings 20 and 21, and to comply with soil use restrictions. EPA proposes to implement the cap requirement as well as land restrictions necessary to prevent human exposure to contaminants at the Facility through an Environmental Covenant.

1. Soils

A. Because some contaminants remain in Facility soils at levels which exceed EPA's unrestricted use standards, and as the remedial requirements under the TSCA's Self-Implemented Cleanup Standards for having residual PCB-containing materials (>1ppm and ≤10ppm) remain at the site as fill, a cap of at least 10 inches of soil or 6 inches of concrete/asphalt is required over the affected areas, former Buildings 20 and 21. This cap has already been constructed and consists of the Processing Center building and the surrounding parking lots. Inspection and maintenance of this cap will be required under

Statement of Basis

an Environmental Covenant signed by EPA.

B. As some contaminants remain in Facility soils at levels which exceed unrestricted use, EPA's proposed decision requires the compliance with, and maintenance of, the following use restrictions. These restrictions will be implemented through an Environmental Covenant signed by EPA.

1. Areas shall be restricted to commercial and/or industrial purposes and shall not be used for residential purposes, unless it is demonstrated to EPA that such use will not pose a threat to human health or the environment or adversely affect or interfere with the selected remedy, and the Facility provides prior written approval from EPA for such use.
2. The Processing Center building and parking lots shall be inspected and maintained to ensure effective exposure control from Facility soils.

In addition, the Facility shall provide EPA with a coordinate survey as well as a metes and bounds survey, of the Facility boundaries and the Processing Center building and parking lots boundaries. Mapping the extent of the land use restrictions will allow for presentation in a publicly accessible mapping program.

Section 6: Evaluation of Proposed Remedy

This section provides a description of the criteria EPA used to evaluate the proposed remedy consistent with EPA guidance.

Threshold Criteria	Evaluation
1) Protect human health and the environment	EPA's proposed remedy for the Facility protects human health and the environment by eliminating, exposure to contaminants through the implementation and maintenance of use restrictions and post-remedial care to capping. EPA is proposing to require a maintained cap and restrict land use to commercial or industrial purposes at the Facility by requiring an Environmental Covenant to contain such restrictions and be signed by EPA.
2) Achieve media cleanup objectives	Investigation results at the former GE Skeats facility demonstrate that some soils do not meet current EPA Region 3 RSL standards for unrestricted use. The remedy proposed in this SB would limit use of the property to

Statement of Basis

Former GE Skeats High Power Laboratory

August 2016

	commercial/industrial uses, provide exposure control to site soils and comply with the Self-Implemented Cleanup Standards under TSCA.
3) Remediating the Source of Releases	<p>In all proposed remedies, EPA seeks to eliminate or reduce further releases of hazardous wastes and hazardous constituents that may pose a threat to human health and the environment. The Facility has met this objective.</p> <p>The source of contaminants have been removed from the soil at the Facility to the extent practicable. There are no remaining discrete sources of waste from which constituents would be released to the environment.</p>

Balancing Criteria	Evaluation
4) Long-term effectiveness	The long term effectiveness of the remedy for the Facility will be maintained by compliance with cap maintenance and use restrictions by the current and all subsequent property owners bound by the controls. This will be confirmed by an annual compliance report that will be required by an Environmental Covenant and submitted to EPA.
5) Reduction of toxicity, mobility, or volume of the Hazardous Constituents	Reduction has already been achieved, as demonstrated by the data from the groundwater monitoring and soil sampling results.
6) Short-term effectiveness	EPA's proposed remedy does not involve any activities, such as construction or excavation that would pose short-term risks to workers, residents, and the environment.
7) Implementability	EPA's proposed remedy is readily implementable. EPA proposes to implement maintenance of the existing cap, and use restrictions through an enforceable mechanism such as an Environmental Covenant.
8) Cost	The costs associated with this proposed remedy are minimal as they consist of the maintenance and inspection of the building and parking lots.
9) Community Acceptance	EPA will evaluate community acceptance of the proposed remedy during the public comment period, and it will be described in the Final Decision and Response to Comments.
10) State/Support Agency Acceptance	PADEP has been apprised of the proposed remedy and will evaluate and provide comments during the public comment period.

Statement of Basis

Former GE Skeats High Power Laboratory
August 2016

Section 7: Public Participation

Interested persons are invited to comment on EPA's proposed remedy. The public comment period will last thirty (30) calendar days from the date that notice is published in a local newspaper. Comments may be submitted by mail, fax, or electronic mail to Ms. Linda Matyskiela at the contact information listed below.

A public meeting will be held upon request. Requests for a public meeting should be submitted to Ms. Linda Matyskiela in writing at the contact information listed below. A meeting will not be scheduled unless one is requested.

The Administrative Record contains all the information considered by EPA for the proposed remedy at this Parcel. The Administrative Record is available at the following location:

U.S. EPA Region III
1650 Arch Street
Philadelphia, PA 19103
Contact: Ms. Linda Matyskiela (3LC30)
Phone: (215) 814-3420
Fax: (215) 814-3113
Email: Matyskiela.Linda@epa.gov

Figure 1: Map of Facility

Date: _____

8.8.16



John A. Armstead, Director
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US EPA, Region III

Statement of Basis

Former GE Skeats High Power Laboratory
August 2016

Section 8: Index to Administrative Record

EPA Region III Office and PADEP Southeast Regional Office

Preliminary Assessment (PA) Report, 1984, NUS Corporation

Draft Phase II Environmental Site Assessment for the Proposed Relocation of the Processing and Distribution Center, 1999, Weston

Closure of Former Hazardous Waste Accumulation Area (Less than 90-day Storage), 1999, O'Brien & Gere Engineers Inc.

Decontamination and Demolition Project, Project Closure Report, 1999, MARCOR Remediation Inc.

Request for Non-Use Aquifer Determination, 1999, Weston

Remedial Action Report, 2004, Pennoni

7500 Lindbergh Boulevard Property, Vapor Intrusion Weight of Evidence Evaluation, EPA, date July 23, 2012

Statement of Basis

Former GE Skeats High Power Laboratory
August 2016

Figure 1

Statement of Basis

Former GE Skeats High Power Laboratory
August 2016



SOURCE:
GOOGLE.COM

SCALE: 1"=400'
 S.O. NO.: 114495
 DSN/DWN: JPK/RRR

DATE: AUGUST 2009
 FILE: 114495-GES_01
 CHK: JPK



MICHAEL BAKER JR., INC.
 MOON TOWNSHIP, PENNSYLVANIA

LON= 75°14.4.79"W
 LAT = 39°54'15.46"N

FIGURE 1
 FACILITY LOCATION MAP
 FORMER GE SKEATS HIGH POWER LABORATORY
 7500 LINDBERGH BOULEVARD
 PHILADELPHIA, PENNSYLVANIA