



# STATEMENT OF BASIS

REGION III  
EPA ID #  
PAD  
001307792

## Armstrong World Industries (former) Lancaster, Pennsylvania July, 2013

<b>Facility/Unit Type:</b>	<b>Hazardous Waste Treatment, Storage, Disposal Facility</b>
<b>Contaminants:</b>	<b>Volatile Organic Compounds (VOCs), Semi Volatile Organic Compounds (SVOCs), and Heavy Metals</b>
<b>Media:</b>	<b>Groundwater, Soil</b>
<b>Proposed Remedy:</b>	<b>The implementation of institutional controls (ICs), the Environmental Covenant detailing the Soil Management Plan and use limitations has been prepared and approved pursuant to the Pennsylvania Uniform Environmental Covenants Act</b>

### I. INTRODUCTION

The United States Environmental Protection Agency (EPA) has prepared this Statement of Basis (SB) to solicit public comment on its proposed remedy for Armstrong World Industries (AWI), which is subject to EPA's Corrective Action program under the Solid Waste Disposal Act, as amended, commonly referred to as the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Sections 6901 et seq.

EPA is providing a 30-day public comment period on this SB and 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 comment period has ended.

Information on the Corrective Action program as well as a fact sheet and the Government Performance and Results Act Environmental Indicator Determinations 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 on which EPA's proposed remedy is based. See Section VIII for information on how you may review the AR.

### II. FACILITY BACKGROUND

The Facility is located at Liberty and Charlotte Streets, Lancaster City, Lancaster County, Pennsylvania. The Facility is situated on approximately 67 acres of land.

AWI operated a number of facilities on their property for over 100 years. Operations included the manufacturing of various flooring materials. In 2004, AWI consolidated its operations to the western portion of the site known as the Roto Parcel (20 acres). The remaining 47 Acres were divided into two parcels, the College Parcel (27 acres) and the Lancaster General Hospital/Economic Development Company Parcel (20 acres). All of the buildings in these two parcels were demolished. Site soils received a PADEP Act 2 relief of liability in 2009.

Quarterly attainment monitoring began at the entire 67 acre site in September 2007 and concluded in April 2009. Laboratory analysis of groundwater samples demonstrate attainment for the entire property of both the used and non-used PADEP Residential Statewide Health Standard for all suspected compounds. Lancaster City has a Non-Use Aquifer Determination in their municipality.

The remediation efforts have been implemented in accordance with the requirements of the Pennsylvania Department of Environmental Protection's Land Recycling and Environmental Remediation Standards Act (Act 2).

Environmental Protection Levels (EPLs) and Threshold Limit Values (TLVs) have been established in accordance with EPA risk assessment guidance. EPA has determined that the cleanup levels are protective of human health and the environment for non-residential land use.

#### **IV. CORRECTIVE ACTION OBJECTIVES**

EPA's Corrective Action Objectives for the Facility are the following:

##### **1. Soils**

Armstrong World Industries has demonstrated that soil contamination levels at its Roto Facility do not pose unacceptable risk to non-residential occupants. EPA's Corrective Action Objective for Facility soils is to prohibit residential use of the property by current and future owners through use of a deed covenant.

##### **2. Groundwater**

Armstrong World Industries has demonstrated that groundwater contamination levels at its Roto Facility do not pose unacceptable risk to non-residential occupants. EPA's Corrective Action Objective for Facility groundwater is to prohibit residential use of the property by current and future owners. This objective has been met through the use of a PADEP Non-use aquifer designation and Lancaster City ordinance prohibiting drinking water wells from being installed, and requiring connection to the public water supply.

#### **V. PROPOSED REMEDY**

Implementation of institutional controls (ICs) to minimize the potential for human exposure to contamination and protect the integrity of the proposed remedy decision.

EPA's preferred instrument to enforce an Environmental Covenant prepared under Pennsylvania's Uniform Environmental Covenants Act, 27 Pa. C.S. §6501 et seq. (UECA). EPA has determined that an Environmental Covenant is an appropriate and enforceable mechanism.

Environmental Covenants are required under Pennsylvania Law for remediated facilities that require land use restrictions and are being relied upon by EPA's Corrective Action program.

The Facility recorded their Environmental Covenant for the Roto Parcel with the Lancaster County Recorder of Deeds on September 12, 2012.

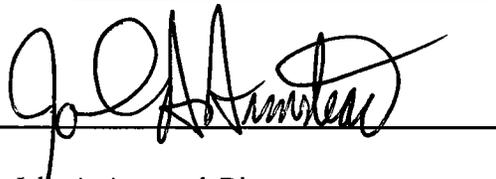
#### **VI. EVALUATION OF PROPOSED REMEDY**

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

## IX. INDEX TO ADMINISTRATIVE RECORD

- Work Plan for Closure of Underground Storage Tanks, March 28, 1988
- Environmental Priorities Initiative Preliminary Assessment of Armstrong Floor Plant, NUS Corporation – Superfund Division, September 20, 1989
- Final Environmental Indicator Inspection Report, Tetra Tech, December 2005
- Final Report, Armstrong World Industries EDC/LGH Parcel, October 2008
- Final Report, Armstrong World Industries College Parcel, February 2009
- Final Groundwater Report, Armstrong Report, ARM Group Inc., September 2009
- Post-Remedial Care Plan Armstrong World Industries, ARM Group Inc., August 20, 2010
- Final Report, Armstrong World Industries Roto Parcel, April 2012
- Former Armstrong World Industries Final Groundwater Report, Post-Remediation Care Plan Completion Report, and PADEP Approval Letter, April 2012
- Armstrong World Industries Environmental Covenant, including Parcel Soil Management Plan, Recorded in Lancaster County on September 12, 2012

Date: 8.8.13



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