



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III

STATEMENT OF BASIS

Avery Dennison Corporation (Paxar)

Sayre, PENNSYLVANIA

EPA ID NO. PAD 080879588

Prepared by
Office of Pennsylvania Remediation
Land and Chemicals Division
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Section 1: Introduction

The United States Environmental Protection Agency (EPA) has prepared this Statement of Basis (SB) for the Avery Dennison Corporation (Paxar) facility located at 317 South Thomas Avenue, Sayre (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.

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

The Facility is located at 317 South Thomas Avenue, Sayre, Pennsylvania. The Facility is surrounded by a chain-linked fence and is bordered by other industrial buildings, and a railroad spur. The site is approximately 1,000 feet west of the Susquehanna River. The Facility covers approximately 2.5 acres.

The site was historically used as a beer brewery and candy manufacturer until 1952 when Paxar Corporation purchased the property and began using it for screen printing, fabric coating, and/or thermal printer manufacturing until 2006. It has been reported that Paxar used inks, solvents and zinc at the property during this time period.

In 2006, Avery Dennison Corporation (Avery) acquired the assets of Paxar Corporation. The property and those surrounding it are zoned for light commercial use.

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Section 3: Summary of Environmental History

Avery had two 10,000 Gallon Underground Storage Tanks (USTs) removed from the property. The first, a sectional UST was located on the southwestern side of the building. This storage tank was divided into three compartments and had a total capacity of 10,000 gallons. This UST contained the products methyl ethyl ketone (MEK), toluene, and isopropyl alcohol (IPA). In August 1994, this UST was removed by a tank removal contractor. According to the PADEP *Underground Storage Tank Closure Report*, the soil appeared to be uncontaminated and was used as backfill. The closure report also noted that the tank and piping appeared to be in good condition upon removal. All pipes were cleaned and the area was capped.

A second UST was removed from the northeast corner of the property. This UST also had a capacity of 10,000 gallons and was used for storage of heating oil. This UST was removed in October 1993. According to the closure report, soil samples and field observations indicated that the UST was not releasing petroleum into the surrounding soil.

From 2007 to 2010, a multi-phased environmental site investigation was conducted at the site by Avery. In 2007, a Phase I investigation identified seven areas of concern at the property. Avery installed nine monitoring wells and collected 29 soil samples from soil borings and a subsurface vault. They took these findings and expanded the investigation to include 20 additional ground water wells, 75 additional soil samples, 45 sub slab soil gas samples, 17 indoor air samples, and 3 outdoor air samples. Soil and groundwater samples were collected and analyzed for volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), total petroleum hydrocarbons (TPH) and metals. Soil gas and indoor air samples were collected and analyzed for VOCs.

A total of 76 soil samples were analyzed for VOCs. Tetrachloroethylene (PCE) was the only compound that exceeded the SHS in five samples. An equivalency demonstration for PCE was performed using a fate and transport model projected out for 30 years to demonstrate attainment with the SHS. A total of 63 soil samples were analyzed for SVOCs. Benzo(a)pyrene was the only compound found to exceed the SHS in three surface soil samples in the northeast corner of the property. A limited excavation was conducted in this area and 79 cubic yards of soil was removed. Five confirmatory soil samples were collected from the excavation and benzo(a)pyrene was detected below the SHS in all samples. A total of 43 soil samples were analyzed for metals. Arsenic, lead and mercury were detected above the SHS. An equivalency demonstration was also performed for these metals using a fate and transport model projected out for 30 years to demonstrate attainment with the SHS. A three-dimensional monitoring well network consisting of 29 wells was utilized for both groundwater characterization and attainment. Four consecutive quarters were collected to obtain attainment for the following compounds: benzene, chloroform,

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ethylbenzene, methyl chloride, methyl ethyl ketone, PCE, toluene, xylenes (total), lead, and mercury.

Two vapor intrusion sampling events were conducted in October and December 2008 To demonstrate that no VOCs exceeded nonresidential SHS in indoor air.

An Ecological Screening under the SHS and determined that since the site was less than 2 acres no additional action was necessary.

The Final Report was administratively complete and approved on February 28, 2013.

The facility originally demonstrated attainment for PADEP Nonresidential Statewide Health Standards in 2012, but the new owners wanted to use the fields for recreational soccer. The facility owners then demonstrated attainment for PADEP recreational (residential) level, where 79 cubic yards of contamination were removed, and one small area was capped with concrete. The new owners filed a covenant on June 21, 2016, which will run with the property to ensure that the cap is properly inspected and maintained.

Section 4: 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 the migration of contaminated groundwater under control indicator on January 4, 2013. The EPA has determined that the Facility met the current human exposures under control indicator on January 4, 2013.

Section 5: Public Participation

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 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: Grant Dufficy
Phone: (215) 814-3455
Fax: (215) 814-3113

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Email: dufficy.grant@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. Grant Dufficy. EPA will hold a public meeting to discuss this proposed decision upon request. Requests for a public meeting should be made to Mr. Grant Dufficy.

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. Grant Dufficy at the address listed above.

Date: 8.26.16

A handwritten signature in blue ink, reading "John A. Armstead", is written over a horizontal line.

John A. Armstead, Director
Land and Chemicals Division
US EPA, Region III