UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III

STATEMENT OF BASIS

Prior Coated Metals, Inc.

Allentown, Pennsylvania

EPA ID NO. PAD056602923

Prepared by
Office of Pennsylvania Remediation
Land and Chemicals Division
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Table of Contents

List of Acronyms

APC	Areas of Potential Concern
AR	Administrative Record
BGS	Below Ground Surface
COCs	Contaminants of Concern
EPA	Environmental Protection Agency
FDRTC	Final Decision and Response to Comments
FR	Final Report
MCL	Maximum Contaminant Level
MSC	Medium Specific Concentrations
NIR	Notice of Intent to Remediate
RCRA	Resource Conservation and Recovery Act
RSL	Regional Screening Level
SB	Statement of Basis
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 Prior Coated Metals Facility located at 2233 26th Street SW, Allentown, Pennsylvania 18103 (hereinafter referred to as the Facility or Site).

EPA's proposed remedy for Prior Coated Metals (PCM) consists of the following components:

1) Establishing a Technical Impracticability Boundary for groundwater;

2) Groundwater monitoring and reporting of contaminants of concern (COCs) to insure the constituent levels remain stable (or decrease) and the small contaminant plume remains within its current boundaries;

3) Compliance with and maintenance of soil and groundwater use restrictions to be implemented through institutional controls.

This SB highlights key information relied upon by EPA in proposing its remedy for Facility.

The Facility 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. The Corrective Action program requires that owners and/or operators of facilities subject to certain provisions of RCRA investigate and address releases of hazardous waste and hazardous constituents, usually in the form of soil or groundwater contamination, that have occurred at or from their property. The Commonwealth of Pennsylvania is not authorized for the Corrective Action program under Section 3006 of RCRA. Therefore, EPA retains primary authority in the State of Pennsylvania for the Corrective Action Program.

EPA is providing a thirty (30) day public comment period for 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 (FDRTC) after the comment period has ended.

Information on the Corrective Action program, 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, including data and quality assurance information, on which EPA's proposed remedy is based. See Section 8, Public Participation, for information on how you may review the AR.

Section 2: Facility Background

The Facility was originally constructed by the Fort Duquesne Company and began operating as a steel manufacturing facility in 1962. The duration of Fort Duquesne Company's operation is not known. Records do show that the Facility was owned and operated by Hillman Company prior to 1981. In 1982, the Facility was purchased by Nicolas J. Bouras, Inc. and operated as PCM.

The PCM property consists of approximately 4.5 acres of land located in the City of Allentown, Lehigh County, Pennsylvania. Land use immediately surrounding the Facility is industrial, with residential areas to the north, east, and southeast. PCM is bound on the north by Weppco Associates and undeveloped land owned by Pennsylvania Power and Light (PPL). To the east, PCM is bound by Insulation Corporation of America and Advanced Environmental Recycling Corporation, followed by Emmaus Street and a residential area. West of the Facility is ETI Trucking Terminal and Geiger Beverage, followed by railroad tracks owned by Conrail, Lehigh Street, and then the Queen City Airport.

Access to the PCM is via 26th Street. There are two buildings (the manufacturing building and the main office) located on-site, both constructed in 1962. The manufacturing building encompasses approximately 105,300 square feet of the northern portion of the Facility property. The manufacturing building houses the coating line, slitter, packaging line, three storage/warehouse areas, a maintenance shop/office, five chemical drum storage areas, the solvent distillation room, the plant office, and a locker room. Additions to the manufacturing building include a 9,000 square foot paint and solvent storage room constructed along the southeastern corner of the manufacturing building in 1964 and a 2,250 square foot wastewater treatment plant (WWTP) constructed on the northeastern corner of the manufacturing building in 1986. The main office building encompasses 2,240 square feet of the Facility along 26th Street. A fenced retention basin is located on the northwestern portion of the Facility. A shed for pallet storage is located on the northern portion of the Facility. The majority of the Facility is asphalt-covered; however, grass-covered areas exist.

Site processes include cleaning, painting, and heating cold-rolled galvanized coils of metal. PCM houses a 390-foot long process line (in operation since 1962) that is generally comprised of the following components: cleaning/oil removal, chromic acid rinse, paint spray tower, ovens, and metal specification cutting. A drainage system located beneath the cleaning and chrome rinse lines empties into a concrete-lined sump that discharges wastewater to the on-site WWTP.

Section 3: Summary of Environmental Investigations

For all environmental investigations conducted at PCM, groundwater concentrations were screened against federal Maximum Contaminant Levels (MCLs) promulgated pursuant to Section 42 USC Section 300f et seq. of the Safe Drinking Water Act or Region III Residential Tapwater Screening Levels. Soil concentrations were screened against EPA Regional Screening Levels (RSLs) for industrial soil.

3.1 Environmental Investigations and Remedial Activities

An Environmental Indicator (EI) Inspection of PCM was performed by URS Corporation (URS) and submitted to EPA on August, 2008. At the time of the EI inspection, no evidence of past or present releases was identified from the areas of potential concern (APC). As part of the EI Report, URS performed a well search through the Pennsylvania Groundwater Inventory System. Results of the completed groundwater receptor evaluation do not indicate any potential receptors within 1,000 feet of the Facility, which is well beyond the extent of identified groundwater impacts. The receptor evaluation was completed based on the identification of groundwater impacts at the Facility to evaluate exposure to receptors (e.g. potential potable wells and surface water). Results of a well search did not identify the presence of any potable wells within a 2,500 foot radius of the Facility. The closest surface water body to the Facility is Trout Creek, approximately 5,400 feet to the east of the Facility.

Subsurface Soil Remediation - Septic Tank Removal

Former Facility operations included occasional discharges of organic solvents and paint wastes to a septic tank located behind the Paint Storage Room. The septic tank was located on a narrow strip of land to the east of the Paint Storage Room and Spent Solvent/Paint Cartridge Area exterior wall. The septic tank was identified by PCM as a potential source of release and was removed in March 2011.

Following septic tank removal, observed impacted soil was excavated to the extent practicable. Due to the structural concerns with excavation adjacent to the building, not all impacted soil based on field-screening could be removed. A total 64.5 tons of soil was excavated and disposed off-site. Post-excavation soil sampling results indicated that concentrations of ethylbenzene, naphthalene, tetrachloroethene (TCE), and 1,2,4-trimethylbenzene (1,2,4-TMB) exceeded their respective RSLs in soil after the septic tank excavation. These contaminants were located 7-12 feet below ground surface (bgs), some of which was below 12 inches PCM's concrete flooring. These exceedances were subsequently delineated horizontally as part of the soil characterization activities

associated with the Paint Storage and Coating Rooms. A summary of these exceedances is provided in an attachment 6. This area was re-graded following excavation and post-excavation soil sampling activities.

Site restoration activities were completed following septic tank removal and sampling activities in March 2011. The excavation was backfilled to grade with certified virgin clean fill. Sixty-five tons of clean stone fill was brought on-site and compacted into place.

PCM purchased a portion of the adjacent property from Weppco Associates, so that all sub surface soil impacts be contained on PCM-owned property and remain under PCM control.

There are no current complete human health exposure pathways to the residual soil contamination.

Groundwater

Groundwater characterization activities were completed between August 2011 and September 2013 to assess impacts to groundwater quality after removal of most of the contamination source. The investigation was completed to evaluate groundwater quality at existing well locations and in areas where volatile organic compound (VOC) soil impacts were previously identified in the Paint Storage Room and Spent Solvent/Paint Cartridge Area.

The scope of the groundwater characterization activities included the collection of groundwater samples from temporary well points outside the Paint Storage Room and Spent Solvent/Paint Cartridge Area, installation of three overburden monitoring wells and six bedrock monitoring wells, and the completion of seven groundwater monitoring and sampling events from the expanded well network (14 wells in total).

The water table generally occurs within the bedrock material, at depths of approximately 61 to 75 feet below ground surface (bgs). However, based on observations during soil boring advancement and overburden well installation activities, seasonally perched groundwater has been encountered in the overburden material in the vicinity of the former septic tank at depths ranging from 8 to 30 feet bgs.

The primary constituents of concern in groundwater are 1,1,1- trichloroethane (TCA), 1,1- dichloroethene (DCE), 1,2,4-TMB, 1,3,5-TMB, benzene, cis-1,2-DCE, tetrachloroethene (PCE), toluene, and trichloroethane (TCE).

A receptor evaluation was completed based on the identification of Facility groundwater impacts to evaluate the presence of potential receptors (potential potable wells, and surface

water) in the vicinity of the Facility. A well search (2,500 foot radius of Facility) was completed using the Pennsylvania Department of Conservation and Natural Resources Groundwater Information System online database and information obtained from the local municipal water supplier (the City of Allentown). A summary of the well search results are as follows:

- No domestic (potable) wells were identified.
- Eleven industrial wells were identified side gradient of PCM including one well 640 feet west of PCM, three wells 880 feet east of PCM, and seven wells 1,040 feet west of PCM.
- Four industrial wells were identified down gradient of the Facility approximately 1,200 feet north of PCM.
- Three properties were identified south (upgradient) of the Facility that do not have municipal water connections and thus these properties may use domestic wells for their water supply. These properties are located at approximate distances of 1,200 feet, 1,840 feet and 2,240 feet from PCM.
- All other tax parcels within 2,500 feet of the Facility have a municipal water connection, according to the city of Allentown.

Groundwater sampling results for the September 2013 sampling event at shallow monitoring wells MW-6S and 6D (this well exhibits the highest levels of contamination found at PCM) indicate some exceedances. A summary of these exceedances is provided as attachment 7.

Remedial investigative findings to date show groundwater containing dissolved solvents has not migrated off-site. Investigations do show all high values of contamination clustering around well MW-6S and 6D (nested pair).

Monitoring wells MW- 4, MW-5, and MW-12D were installed downgradient of the contaminated wells MW-6S and 6-D, and show no signs of contamination. MW-4 and MW-5 are located 330 ft. downgradient of wells MW-6S and 6-D. MW-12D is located 165 ft. downgradient of wells MW-6S and 6-D.

Groundwater analytical data demonstrate that the highest contamination exceedances are found in well 6S. All groundwater impacts are contained 13 to 18 feet bgs. There are no completed pathways for human or environmental exposure to groundwater contamination at PCM.

EPA has determined that the contaminant plume in the shallow aquifer (i.e. 13 -18 bgs) comprises an area of approximately 25 feet by 225 feet centered on Wells 6S/6D. It is not practicable to achieve the MCL for TCE or Toluene in this area since the soil beneath the building cannot be removed. EPA groundwater policy recognizes these circumstances as Technical Impracticability or TI and the area associated with TI is known as the TI zone. Note that outside the TI zone at PCM, the shallow groundwater does not exceed MCLs.

Surface Water

The closest surface water body to the Facility is Trout Creek, located approximately a mile east of the Facility. The Little Lehigh River is located 6,000 feet to the northwest of the Facility. There are no completed pathways between "contamination" and human receptors.

Soil Gas Characterization

After discovering the contaminated soils associated with the Former Septic Tank, PCM installed three non-permanent sub-slab soil gas sampling points inside the Paint Storage Room and Spent Solvent/Paint Cartridge Area in May 2011. The vapor points were sampled on May 7, 2011. Photoionization detector (PID) readings observed during the sampling included 2.0 ppm for SSG-1, 56.7 ppm for SSG-2 and 523 ppm for SSG-3. The summa canister for sub-slab soil gas sample SSG-3 malfunctioned during sample collection so the canisters for the remaining two sub-slab soil gas samples (SSG-1 & SSG-2) were sent for laboratory analysis.

While several constituents were detected in the soil gas, only toluene in SSG-2 (1,050 mg/m^3) was found at a concentration above its PADEP Soil Gas Standard of 120 mg/m^3. In EPA's most recent vapor intrusion guidance (June 2015), a sub-slab soil gas to indoor air attenuation factor of 0.03 is recommended. Applying this attenuation factor with the maximum soil gas concentrations detected in the Vapor Intrusion Screening Level (VISL) calculator indicates that toluene (1050 mg/m^3 in soil gas equates to a Hazard Quotient =1.4) and ethylbenzene (1.04 mg/m^3 in soil gas equates to a $6.4x10^{-6}$ cancer risk) were the only contaminants detected, both in SSG-2, above a 10^{-6} cancer risk screening level or above an HQ of 1.0.

In June 2011, PCM installed a fourth non-permanent sub-slab soil gas sampling point also located within the Paint Storage Room. A sample from this vapor point (SSG-4) and a sample from the location of the former malfunctioning canister (SSG-3) were collected and submitted for laboratory analysis on June 28, 2011. The goal of this sampling event was to try to determine the extent of the toluene contamination seen the month before in

SSG-2, also located within the Paint Storage Room. PID readings observed during the June 2011 sampling included 211 ppm for SSG-3 and 205 ppm for SSG-4. While several VOCs were detected in the soil gas samples, no exceedances of PADEP's soil gas MSCs were observed and all of the results were below a 10^{-6} inhalation cancer risk and non-cancer HQ of 1.0 per the VISL calculator.

TCE was **not** detected at concentrations of vapor intrusion concern in any of the four sub-slab soil gas samples although it was observed in groundwater as high as 7,200 µg/l in MW-6S (screened between 13–18 feet bgs and located less than 15 feet from soil gas sample SSG-2).

EPA has concluded that the indoor vapor intrusion pathway is not a health concern under non-residential use of the Facility property.

3.2 Act 2 (Final Report)

EPA Reviewed the Act 2 report which is included the Administrative Record.

On July 2014, PCM submitted a Notice of Intent to Remediate (NIR) enrolling the Facility in the PADEP's Land Recycling and Environmental Remediation Standards Act (Act 2), 35 P.S. Sections 6026.101 *et seq*., program. The areas to be addressed under Act 2 were soil and groundwater contamination identified during removal of the old PCM septic system. PCM elected to enter into the One Cleanup Program as described in the April 2004 Memorandum of Agreement (MOA) between EPA and PADEP. The MOA describes how facilities can be remediated under Act 2 while simultaneously satisfying Federal Corrective Action obligations. PCM entered into the One Cleanup Program on December, 2013.

An Act 2 Remedial Investigation and Final Report (FR) was submitted to PADEP and EPA in August 2015. The combined FR summarized the investigations and remedial actions undertaken at the Facility.

Included in the Act 2 FR is a human health risk assessment (HHRA) for PCM soils in accordance with PADEP regulations and EPA guidance. The Conceptual Site Model assumptions made in the HHRA are that contaminated soils are covered by impermeable surfaces (the concrete floor cap) and PCM will continue to be used in an industrial use scenario. Constituents of Concern (COCs) were identified and screened against EPA Region 3 Regional Screening Levels (RSLs). Site specific soil information taken into account in the HHRA demonstrated that the risk level of the residual soil contaminant exposure levels remaining do not exceed a risk level of $1x10^{-4}$ and a hazard index of 1.

The Act 2 Final Report included proposed land and groundwater use restrictions at PCM. PADEP notified the public that it received the Final Report in the 9/12/15 issue of the PA Bulletin. EPA has reviewed and agrees with the conclusions and recommendations in the Final Report. Specific restrictions as detailed in the Environmental Covenant approved on May 20, 2015 and recorded on June 16, 2015 (June 2015 Environmental Covenant) (See Attachment 6 and 7) are as follows:

a. The Facility property shall be restricted to use as non-residential property, as defined by the Pennsylvania Land Recycling and Environmental Remediation Standards Act, 35 P.S. § 6026.103;

b. Groundwater from beneath the Facility property shall not be used for drinking water and commercial agricultural use(s), including, but not limited to, irrigation of crops, watering of livestock, and food production, processing, or packaging without appropriate treatment and/or approval provided by the PADEP and EPA.

c. Any excavation or other intrusive activity that could result in contact with contaminated groundwater or soil within the extent of area of impact is prohibited unless supported by a site-specific health and safety plan approved by PADEP and/or EPA.

3.2 EPA Assessment

The investigations discussed in the previous sections were completed voluntarily or under PADEP oversight pursuant to PADEP's Act 2 Program. Soil and groundwater sampling results in those reports were initially compared to Act 2 MSCs. Soil standards for the site-specific COCs listed in Table 1 are equivalent to EPA's RSLs and groundwater standards are equivalent to EPA's MCLs for the identified groundwater COCs listed in Table 2.

EPA modeled the potential for the soil vapor to migrate into buildings using EPA's Vapor Intrusion Screening Level (VISL) Calculator. Results showed that only the May 2011 result (1,050 mg/m^3) for toluene had a calculated potential to cause elevated indoor air concentrations under industrial uses. Repeat sub-slab sampling failed to detect significant concentrations of toluene in the subsurface.

Therefore, EPA has determined that soil vapor is not causing concentrations of indoor air contaminants above risk-based levels for industrial use.

In summary, there are no facility-wide impacts to soil, soil gas, or groundwater. Historic environmental investigations and reports discussed above have shown that the only concern is localized VOC impacts from the former septic tank. All accessible impacted soils have been excavated. Soil and indoor air sampling results indicate there

is no concern as long as the facility remains zoned as industrial use. Groundwater sampling results have demonstrated that the contaminated groundwater plume is localized and not migrating.

Section 4: Corrective Action Objectives

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

1. Groundwater

EPA expects final remedies to return usable groundwater to its maximum beneficial use within a timeframe that is reasonable given the particular circumstances of the project. For projects where aquifers are either currently used for water supply or have the potential to be used for water supply, EPA will use the National Primary Drinking Water Standard Maximum Contaminant Levels (MCLs) promulgated pursuant to Section 42 U.S.C. §§ 300f et seq. of the Safe Drinking Water Act and codified at 40 CFR Part 141.

EPA has determined that it is not practicable to achieve the MCL for TCE or Toluene in the shallow aquifer in the vicinity of Wells 6S/6D. The shallow aquifer is not a current or potential source of drinking water. Furthermore, groundwater is not used at the Facility for drinking water and no downgradient users of off-site groundwater exist as determined by discussions with the local water company by PCM during the FR. Therefore, EPA's Corrective Action objectives detailed below are based on the findings of the FR and groundwater attainment sampling.

As such, EPA's Corrective Action Objectives for Facility groundwater are as follows:

a. Continue groundwater monitoring throughout the current network to demonstrate that the TI Zone centered on well 6S/6D remains stable and that remaining wells results remain below MCLs.

b. As long as contaminants remain in the groundwater above applicable MCLs, control exposure to the hazardous constituents remaining in the groundwater by requiring compliance with and maintenance of groundwater use restrictions at PCM.

2. Soil

PADEP's MSCs for non-residential usage meet or are more conservative than EPA's acceptable risk range for non-residential usage. Therefore, EPA has determined that PADEP's MSCs for non-residential usage in addition to the Exposure Point

Concentrations evaluated as part of the HHRA are protective of human health and the environment for individual contaminants at PCM provided that the property is not used for residential purposes.

Therefore, EPA's Corrective Action Objectives for PCM's soils are:

a. Eliminate the exposure to the impacted soil by maintaining the cap over the former septic tank Area; and
b. Prohibit future residential use based on risk based cleanup levels achieved and current and future use risk exposure assumptions; and
c. Implement Post-Remediation Care Plan.

Section 5: Proposed Remedy

EPA's proposed remedy consists of the following components

1) establishing a Technical Impracticability Boundary for groundwater,

2) groundwater monitoring and reporting of COCs to insure the constituent levels remain stable (or decrease) and the small contaminant plume remains within its current boundaries; and

3) compliance with the Environmental Covenant which was recorded on the title to the Facility Property with the Lehigh County Recorder of Deeds on February 19, 2016 (see Attachments 8-9).

In addition to the covenant recorded on the Facility property, PCM recorded a covenant on the adjoining Weppco property. This covenant restricts groundwater use on the Weppco property due to a groundwater contamination originating on the Facility property.

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. The criteria are applied in two phases. In the first phase, EPA evaluates three decision threshold criteria as general goals. In the second phase, for those remedies which meet the threshold criteria, EPA then evaluates seven balancing criteria.

Threshold Criteria	Evaluation
1) Protect human health and the environment	EPA's proposed remedy will protect human health and the environment by eliminating, reducing, or controlling potential unacceptable risks. The Environmental Indicator evaluated all exposures to human health and the environment. EPA's proposed remedy for the Facility requires groundwater use restrictions to minimize the potential for human exposure to contamination and protect the integrity of the remedy. EPA will require continued groundwater monitoring and reporting of COCs to insure the constituent levels remain stable (or decrease) and the small contaminant plume remains within its current boundaries.
2) Achieve media cleanup objectives	EPA's proposed remedy meets the media cleanup objectives appropriate for the expected current and reasonably anticipated land and water resource uses. The remedy proposed in this SB is based on the current and future anticipated land use at the Facility as non-residential. The proposed remedy does not meet groundwater cleanup standards that would allow for residential use of groundwater at the Facility, however, achieving groundwater MCLs is technically impracticable because of the presence of DNAPL and no on-site receptors exist for groundwater. The activity use restriction will eliminate future unacceptable exposures to both soil and groundwater.
3) Remediating the Source of Releases	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. Remediation of the source material in the area of Wells 6S/6D has been shown to be technically impracticable since the soil beneath the building cannot be removed. Other sources in the Areas of Potential Concern have been excavated and remediated to the maximum extent practicable.

Balancing Criteria	Evaluation
4) Long-term effectiveness	The current and reasonably anticipated use of the Facility is non-residential. In addition, groundwater is not used at the Facility for drinking water and no downgradient users of off-site groundwater exist. Therefore, the long term effectiveness of the remedy for PCM will be maintained by the implementation of land and groundwater use controls.
5) Reduction of toxicity, mobility, or volume of the Hazardous Constituents	The reduction of mobility and volume of hazardous constituents has already been achieved as demonstrated by the soil removal and data from the soil sampling and groundwater monitoring.
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. The land and groundwater use restrictions have already been implemented through the February 2016 Environmental Covenant.
7) Implementability	The land and groundwater use restrictions have already been implemented through the enforceable February 2016 Environmental Covenants.
8) Cost	Environmental Covenants have already been recorded in the chain of title of the deeds to the Facility property and Weppco properties. The costs associated with this proposed remedy including the maintenance of the concrete floor are minimal (estimated cost of less than $10,000 per year). Therefore, EPA's proposed remedy is cost effective.
9) Community Acceptance	EPA will evaluate Community acceptance of the proposed remedy during the public comment period and will be described in the Final Decision and Response to Comments.
10) State/Support Agency Acceptance	PADEP was the lead agency for the remediation at the Facility, with EPA input under the One Cleanup Program. PADEP and EPA jointly have reviewed and approved the Final Report, the February 2016 Environmental Covenants, and associated remedial activities and use restrictions for the Facility. EPA, therefore, expects State acceptance of the proposed remedy.

Section 7: Financial Assurance

EPA has evaluated whether financial assurance for corrective action is necessary to implement EPA's proposed remedy at the Facility. Given that EPA's proposed remedy

does not require any further actions to remediate soil, groundwater or indoor air contamination, the costs of implementing land and groundwater use restrictions at the Facility have already been incurred, EPA is proposing that no financial assurance be required.

Section 8: Public Participation

Interested persons are invited to comment on EPA's proposed remedy. The public comment period will last 30 calendar days from the date that notice is published in a local newspaper. Comments may be submitted by mail, fax, e-mail, or phone to Mr. Grant Dufficy at the address listed below.

A public meeting will be held upon request. Requests for a public meeting should be made to Mr. Grant Dufficy at the address 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 the Facility. The Administrative Record is available at the following location:

U.S. EPA Region III
1650 Arch Street
Philadelphia, PA 19103
Contact: Grant Dufficy (3LC30)
Phone: (215) 814-3455
Fax: (215) 814 - 3113
Email: dufficy.grant@epa.gov

Section 9: Signature

Date: 8.17.16

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

Section 10: Index to Administrative Record

Environmental Indicator Inspection Report, URS Corporation - August 2008

Environmental Assessment Summary Memorandum, Cody Ehlers Group – November 2007

Phase II Environmental Site Assessment Report, Cody Ehlers Group – March 2008

Combined Act 2 Remedial Action, Remedial Investigation, and Final Report, Langan, Inc. – August 7, 2015

Prior Coated Metals Site Vapor Intrusion Weight of Evidence Evaluation, EPA – May 9, 2014

Environmental Covenant, Prior Coated Metals - recorded February 19, 2016

Environmental Covenant, Weppco Facility- recorded February 19, 2016

Section 11: Attachments

Attachment 1: Figure 1 - Site Location Map

Attachment 2: Figure 2 – Post-Excavation Soil Sampling Locations and Results -- March 2011Site Plan and Soil Boring locations

Attachment 3: Figure 3 – Temporary Monitoring Well Locations

Attachment 4: Figure 4 – Indoor Air Sampling Locations and Results

Attachment 5: Figure 5 – Prior Coated Metal Facility Boundary Locations

Attachment 6: RSL Table

Attachment 7: MSC Table

Attachment 8: Prior Coated Metals Facility Covenant

Attachment 9: Weppco Facility Covenant

Statement of Basis