



UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
STATEMENT OF BASIS  
Conversion Systems, Inc.  
Horsham, PENNSYLVANIA  
EPA ID NO. PAD 064362940

## **I. Introduction**

The United States Environmental Protection Agency (EPA) has prepared this Statement of Basis (SB) for the Conversion Systems, Inc. (Conversion) facility located at 115 Gibraltar Road, Horsham (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 V, Public Participation, for information on how you may review the AR.

## **II. Facility Background**

The Facility is located at 115 Gibraltar Road, Horsham, Pennsylvania. The Facility is bordered by other industrial/commercial offices. The Facility covers approximately 0.6 acres.

## **III. Summary of Environmental History**

Conversion occupied/rented the office space in Pennsylvania Business Campus from 1978 until December 1989. The facility utilized the space as an analytical laboratory and pilot plant for the treatment of hazardous waste. Samples analyzed by Conversion at the site included paint waste and industrial sludges. Wastes were received and research was performed to determine potential uses and disposal methods for the hazardous waste. This facility is currently closed. The current occupant of 115 Gibraltar Rd. is TAC, a private company involved in the wholesale business of control systems and regulators, with no known ties to Conversion Systems, Inc. The number and types of tenants using this addresses' office space since Conversion vacated the space in December 1989 is not known.

PADER confirmed the closure of their 2500 gallon underground holding tank during a May 23, 1984, PADER inspection. A closure plan was submitted to PADER in November 1983. PADER approved closure on April 1985.

A letter from USEPA contractor NUS to USEPA, dated September 27, 1990,

recommended that no further action be taken at the Site under CERCLA.

No spills have been reported at this site, and there appear to be no negative environmental impacts from Conversion's operations.

The site was visited by EPA on July 10, 2008. The record review and site visit are documented in the Final Environmental Indicator Inspection Report which is contained in the AR and available upon request

#### **IV. 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 these indicators on December 27, 2011.

#### **V. Public Participation**

Before EPA makes a final decision on its proposal for the Facility, the public may participate in the remedy 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: Grant Dufficy  
Phone: (215) 814-3455  
Fax: (215) 814-3114  
Email: [dufficy.grant@epa.gov](mailto: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 Grant Dufficy. EPA will hold a public meeting to discuss this proposed decision upon request. Requests for a public meeting should be made to Grant Dufficy.

EPA will respond to all relevant comments received during the comment period. If EPA determines that new information warrant 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 Grant Dufficy at the address listed above.

Date: 2/7/12

---

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