



UNITED STATES

ENVIRONMENTAL PROTECTION AGENCY

REGION III

STATEMENT OF BASIS

FORMER TROJAN YACHT

LANCASTER, PENNSYLVANIA

EPA ID NO. PAD 052922556

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I. Introduction

A. Facility Name

The United States Environmental Protection Agency (EPA) has prepared this Statement of Basis (SB) for the Former Trojan Yacht facility located at 167 Greenfield Road, Lancaster, PA 17601 (hereinafter referred to as the Facility).

The Facility is subject to the 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. Sections 6901 to 6992k. 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.

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>.

B. Proposed Decision

This SB explains EPA's proposed decision that Corrective Action is complete and no land use controls are required for the Facility. EPA's proposed decision is based on a review of EPA and Pennsylvania Department of Environmental Protection (PADEP) files regarding the environmental history of the Facility as presented in the Final Environmental Indicator Inspection Report submitted in November, 2009. Based on this review, EPA has concluded that there are no current or unaddressed releases of hazardous waste or hazardous constituents from the Facility.

C. Importance of Public Input

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 the complete set of reports that document Facility conditions, including a map of the Facility, in support of EPA's proposed decision. EPA encourages anyone interested to review the AR. The AR is available for public review at the EPA Region III office, the address of which is provided in Section V, below.

EPA will address all significant comments received during the public comment period. If EPA determines that new information or public comments 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 approve its final decision in a document entitled the Final Decision and Response to Comments (FDRTC).

II. Facility Background

The Facility is located at 167 Greenfield Road in Lancaster, East Lampeter Township, Lancaster County, Pennsylvania. It is approximately 1.5 miles east of City of Lancaster. The

facility is bordered on the east by Greenfield Road and small light industrial buildings, to the south by the Amtrak and Norfolk Southern mainline railroad tracks and the High Steel Structures, Inc. complex, to the north by Penske Truck Rentals and additional small light manufacturing/commercial facilities, and to the east by U.S. Route 30 Expressway and the Donnelly Printing East complex.

The entire area is zoned industrial and has been an industrialized area since the early 1960s. The Facility covers 26 acres. Land use in the surrounding area is mainly agricultural and industrial. In 1952, Shippen Realty Partners purchased the Site which was originally farmland. In 1955, Trojan Yacht leased the Site for wooden pleasure boat production. In 1967, Whittaker Corporation, located in Los Angeles, California took over the business. In 1983, Bertram Trojan Incorporated (BTI), a division of Bertrex Corporation based in Miami, Florida, bought the business. In 1988, Bertrex Corporation was purchased by the investment group of G.L. Ohrstrom and Company. The construction of the boats began changing from wood to fiberglass in the late 1960's. By the 1980's, only fiberglass boats were produced. The manufacturing of yachts ceased in 1989.

III. Summary of Environmental History

Trojan Yacht manufactured pleasure boats at the site between 1955-1989. In 1955, Trojan Yacht began their operations as the manufacturer of wooden pleasure boats. The production of some fiberglass boats began in the late 1960s. By 1980, all boats were made of fiberglass. The fiberglass process required the use of toluene and methyl ethyl ketone (MEK) peroxide. Wastes generated included acetone still bottoms, polyester resin, and polyester gel coat. Styrene is the primary constituent of polyester resin and polyester gel-coat. Trojan Yacht began reclaiming the acetone waste in 1970 in the acetone reclaiming unit located in the raw solvent storage building.

In August 1980, Trojan Yacht filed a Notification of Hazardous Waste Activity and on November 18, 1980, Trojan Yacht filed the Part A Hazardous Waste Permit Application for generation, transportation, and for treatment, storage, and disposal (TSD) of hazardous wastes. The wastes listed in the Part A Hazardous Waste Permit Application included waste solvents (F003), waste methyl ethyl ketone peroxide (U160), and waste toluene (U220).

A. Solid Waste Management Units (SWMUs)

The Solid Waste Management Units (SWMUs) at the facility included:

1. Hazardous Waste Storage Building (SWMU#1) – The hazardous waste storage building is a metal and concrete building. Wastes stored in the building included waste motor oil, hardened waste polyester resin and gelcoat, toluene, acetone, and MEK peroxide. Wastes were contained in 55-gallon steel drums on wooden pallets on top of concrete floor, in the storage building. The building walls consist of a steel frame with metal siding outside and vinyl-covered walls inside. The lower portions of the walls are concrete, thus serving as secondary containment for the wastes. No releases have been documented for the hazardous waste storage building.

2. Acetone Reclaiming Unit (SWMU#2) – The acetone distillation reclaiming unit was located in the raw solvent storage building. Approximately 430 gallons of acetone were reclaimed per day. The use of the acetone reclaiming unit started in 1970. No releases have been documented from the acetone reclaiming unit.
3. Former Raw Solvent Storage Area (SWMU#3) – The former raw solvent storage area was located south of the north fence and the hazardous waste storage building (SWMU #1). Four aboveground storage tanks (ASTs) were installed in this area since the 1970s. The tanks consisted of one 2,000 gallon acetone tank and three 275-gallon toluene tanks. In 1987, elevated levels of acetone and toluene were detected in the soil at SWMU#3. Spillage of solvents onto the ground during filling of the tanks resulted in releases to the environment. As a result, the tanks were relocated to the raw solvent storage building.
4. Former Waste Storage Area (SWMU#4) – The former waste storage area, a 50-foot by 100-foot area, located adjacent to the eastern fence. The area was used to store drums of wastes between 1970 and 1987. The waste solvents included acetone, toluene and MEK peroxide. Drums of wastes and resins were placed directly on the ground. In addition, waste polyester resin and gel-coat were allowed to harden on the ground. No release controls were present for the area. Releases of solvent, including acetone, styrene, and toluene were reported for this area in 1987, after PADEP sampled the area. The contamination resulted from resins (containing acetone and toluene) hardening on the ground. Waste storage was discontinued at this area after the soil contamination was discovered in January, 1987.

B. Investigation/Remediation

1. Soil

In 1987, contaminated soil was identified at the site. The source of contamination was believed to be spills and overfills during filling of ASTs containing acetone and toluene, and resin that dripped from yachts and was allowed to harden on the ground. Acetone, styrene, and toluene were detected in the soil. Trojan Yacht completed removal of contaminated soil in April 1987.

In October 2006, a soil supplemental sampling was performed to verify that volatile organic compounds were no longer present onsite. Analytical results of the supplemental sampling revealed that VOCs were either not detected or detected at concentrations below the Pennsylvania residential standard (Environmental Indicator Inspection Report, Former Whittaker Corporation, November 2009 and Act 2 – Final Report, Former Trojan Yacht, East Lampeter Township, Lancaster County, PA). EPA is proposing no further action.

2. Groundwater

In 1987, contaminated groundwater was identified at the site. Trojan Yacht began a groundwater investigation in 1992. Between 1992 and 2006, thirteen wells were installed. MW-9 is designed as the downgradient sentry well, located between former source areas and the downgradient property boundary. MW-14 is the downgradient point of compliance well.

Initial groundwater samples exhibited detectable concentrations of acetone, cis 1, 2-dichloroethene, MEK, MTBE, PCE, styrene, 1,1,1-TCA, and xylenes. However, the levels for these constituents were below the Pennsylvania state-wide health standards. Tetrachloroethene (PCE) was found in levels slightly above the drinking water standard of 5 ug/l.

The groundwater attainment samples were collected in November 2006, July 2007, and January 2008. The attainment sampling results were consistent with the characterization results. Only PCE was found at concentrations exceeding drinking water standard.

PCE was not used in the manufacturing process by Trojan. The groundwater investigation at the facility revealed that the contamination of PCE in the groundwater underneath the facility is likely caused by offsite sources. Given the low level regional contamination of groundwater and the origins of which had never been determined (Environmental Indicator Inspection Report, Former Whittaker Corporation, November 2009 and Act 2 – Final Report, Former Trojan Yacht, East Lampeter Township, Lancaster County, PA), EPA is proposing no further action.

The Facility is connected to public water. Groundwater attainment analytical results revealed that the groundwater quality meets PA Statewide Health Standards at the downgradient property boundary. Trend analysis shows that the concentrations of VOCs in the point of compliance well MW-14 at the downgradient property boundary remain below drinking water standard.

On November 20, 2007, PADEP approved the Areawide Non-use Aquifer Designation for City of Lancaster, PA. The non-use aquifer MSC Statewide Health Standard for PCE is 50 ug/l for residential and non-residential. Non-used Aquifer means the groundwater is not used or currently planned to be used for drinking water or for agricultural purposes. Concentrations of PCE in the groundwater characterization results and attainment results are below the non-use aquifer MSC of 50 ug/l. EPA is proposing that institutional controls for the site to limit the use of groundwater are not necessary, since PADEP has approved non-use aquifer areawide.

On March 15, 2010, EPA determined that the facility had met both environmental indicators: (1) Current Human Exposures Under Control and (2) Migration of Contaminated Groundwater Under Control. These determinations are available at <http://www.epa.gov/reg3wcmd/ca/pa.htm>

3. Vapor Intrusion

Vapor intrusion potential at the facility was evaluated in accordance with the Pennsylvania Technical Guidance. Based on the results of the site characterization and site

details, the vapor intrusion pathway has been eliminated as a potential source of exposure. PCE was not detected in the soil samples. Groundwater contains only low levels of PCE. PCE concentrations are below the PADEP vapor intrusion screening criteria. The site conditions meet the requirements set forth in the PADEP Vapor Intrusion Guidance and no vapor intrusion pathway is expected. (Act 2 – Final Report, Former Trojan Yacht, East Lampeter Township, Lancaster County, PA). EPA is proposing no further action.

IV. Evaluation of EPA's Proposed Decision

EPA has determined that its proposed decision for the Facility is protective of human health and the environment, and that no further corrective action or controls are necessary at this time.

V. Public Participation

Interested persons are invited to 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. Comments may be submitted by mail, fax, e-mail, or phone to Ms. Tran Tran at the address listed below.

A public meeting will be held upon request. Requests for a public meeting should be made to Ms. Tran Tran 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 decision at this Facility. The Administrative Record is available at the following location:

U.S. EPA Region III
1650 Arch Street
Philadelphia, PA 19103
Contact: Ms. Tran Tran (3LC30)
Phone: (215) 814-2079
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