



UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION III

STATEMENT OF BASIS

FORMER SAFETY KLEEN SERVICE CENTER  
ALLENTOWN, PENNSYLVANIA  
EPA ID # PAD 980 552 020

Prepared by  
Office of Pennsylvania Remediation  
Land and Chemicals Division  
March 2014

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## **Section 1: Introduction**

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The United States Environmental Protection Agency (EPA) has prepared this Statement of Basis (SB) to solicit public comment on its proposed decision for the Former Safety Kleen facility located at 5540 Memorial Drive Allentown, Lehigh County, Pennsylvania 18104 (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, EPA's 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**

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Former Safety Kleen is located on 1.6 acres of land in Lehigh County Pa. The site was privately owned from 1887-1974. The Lehigh County Industrial Development Association (LCIDA) purchased the property in 1974. Buildings on the site were constructed in 1978. From March 1979 to December 1983 Safety Kleen leased the site from LCIDA. In 1983 Safety Kleen purchased the property from LCIDA. Safety Kleen operated at the facility through August 2003 when they stopped accepting waste.

Safety Kleen submitted their notification of Hazardous Waste Activity on August 12, 1980 as a treatment, storage and disposal facility (TSD). In 2005, Safety-Kleen certified closure to Pennsylvania Department of Environmental Protection. The current owner of the facility is T & D Real Estate Investments, LLC.

The facility is located in a primarily commercial/low density residential area (see Figure 1). The city of Allentown is located approximately 7 miles east of the site. Water is supplied by the municipality and private wells.

## **Section 3: Summary of Environmental History**

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Safety Kleen submitted notification of Hazardous Waste Activity on August 12, 1980 as a treatment, storage and disposal facility (TSD). During that time, Safety Kleen reported 5 spills or releases on site. Each of the spills or releases were properly cleaned up and the cause was corrected.

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Safety Kleen was inspected approximately yearly by PADEP and periodically by US EPA. Safety Kleen began closing the facility in 2003. During this time four ground water samples and two soil samples were taken. Groundwater sample results showed no contaminants present above drinking water standards. In one soil sample arsenic was found to be 4.5 mg/kg which is within EPA's acceptable range for arsenic.

On January 31, 2005 the Pennsylvania Department of Environmental Protection issued approval of the former RCRA closure activities including the acknowledgment that Safety-Kleen complied with 25 Pa. Code Chapters 260a through 270a (Hazardous Waste Management).

In 2007, additional limited subsurface soil investigation and soil sampling was conducted. The samples showed levels of target organic compounds to be below residential soil levels or non detect.

#### **Section 4: Environmental Indicators**

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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 March 10, 2014. The EPA has determined that the Facility met the current human exposures under control indicator on March 10, 2014.

#### **Section 5: Public Participation**

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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 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: Mrs. Catheryn Blankenbiller  
Phone: (215) 814-3464  
Fax: (215) 814-3113  
Email: Blankenbiller.catheryn@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 Mrs. Catheryn Blankenbiller. EPA will hold a public meeting to discuss this proposed decision upon request. Requests for a public meeting should be made to Mrs. Catheryn Blankenbiller.

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## Section 5: Public Participation

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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 Mrs. Catheryn Blankenbiller at the address listed above.

Date:

3.18.14



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

## Index to Administrative Record

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Part A Hazardous Waste Permit submitted to PADEP by Safety Kleen in 1980 and amended in 1983, 1984, 1985, 1986, 1987, 1990, 1992, and 1998.

Final Environmental Indicator Inspection Report, done by Tetra Tech FW, Inc. submitted to EPA and PADEP in October 2003.

Closure Report done by Safety Kleen, submitted to PADEP in December 2004.

Phase I Environmental Site Assessment prepared by J. Rockwood & Associates, Inc submitted to Mr. Vince Palumbo in December 2005.

Detailed Environmental Questionnaire Site Evaluation done by Team Capital Bank in January 2007.

Letter to Mr. Vince Palumbo regarding Exploratory Soil Sampling and Reporting-Suspected UST area, done by J. Rockwood and Associates Inc in January 2007.

Letter to Mr. Vince Palumbo regarding Limited and Focused Subsurface Soil Investigation, done by J. Rockwood and Associates Inc in January 2007.

Memorandum to file done by USEPA in March 2014.

Environmental Indicator for Current Human Exposures Under Control done by EPA signed March 10, 2014.

Environmental Indicator for Migration of Contaminated Groundwater Under Control done by EPA signed March 10, 2014.

Statement of Basis

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Source Google Maps

Figure 1  
Facility Location Map  
Former Safety Kleen Service Center

Not to Scale  
Date 3/17/2014

