

STATEMENT OF BASIS

Osram Sylvania Products, Inc.
835 Washington Rd
St. Mary's, PA 15857
EPA ID# PAD002124386

I. INTRODUCTION

This Statement of Basis (SB) sets forth the United States Environmental Protection Agency's (EPA) proposed decision concerning the need for corrective action at Osram Sylvania Products, Inc. (Facility), located in St. Mary's, Pennsylvania. The corrective action program is designed to ensure that facilities have investigated and cleaned up any releases of hazardous waste and hazardous constituents that may have occurred at their property.

EPA is issuing this SB consistent with public participation provisions of the Resource Conservation and Recovery Act (RCRA). EPA will make a final decision after evaluating any information received during the public comment period.

II. PROPOSED REMEDY

EPA is proposing no further corrective action at this time at the Facility. The proposal is based on EPA's Environmental Indicator (EI) inspection and evaluation, which encompassed a site visit and a comprehensive review of the existing information to assess current environmental conditions at the Facility. EPA has determined that there have been no past or current releases that warrant further investigation or corrective action at the Facility at this time. Should new information in the future reveal the need for additional investigation or remediation, EPA will proceed accordingly.

III. FACILITY BACKGROUND

Osram Sylvania Products, Inc. operates an incandescent light bulb manufacturing plant on approximately 15 acres of land in St. Mary's, Elk County, Pennsylvania. The Facility has been active at this location since 1955, when it was known as Sylvania Electric Products. In 1959 Sylvania Electric Products merged with GTE Corporation and was renamed GTE Sylvania. The Facility expanded its production area and floor space from 1965 through 1990. In 1990 the Facility began specialty incandescent lamp manufacturing after this operation was moved to St. Mary's from another location. In 1993 GTE sold its lighting and precision materials businesses to Osram, and the company was renamed Osram Sylvania Inc. On April 1, 1997 Osram Sylvania Inc. changed its name to Osram Sylvania Products Inc.

In 1990, two underground storage tanks (UST) used to store ethanol and one gasoline UST were removed. Both ethanol USTs showed no evidence of rusting or pitting, and soil sampling taken after UST removal confirmed that surrounding soils were not

contaminated. In 1991, the last UST on the property was removed, which had been used to store diesel fuel. During removal of this UST, groundwater was encountered approximately 1 foot above the bottom of the UST. Soil and groundwater samples taken after UST removal contained detectable levels of total petroleum hydrocarbons (TPH), but were under levels of concern to any human health and/or environmental impacts.

IV. EPA INSPECTIONS, EVALUATIONS, AND CONCLUSIONS

As part of the EI inspection and evaluation for Current Human Exposures and Migration of Contaminated Groundwater, a comprehensive record search and review were conducted by the EPA and the Pennsylvania Department of Environmental Protection (PADEP). This undertaking consisted of evaluating the Facility's manufacturing operations and waste management practices, RCRA permit applications, historical spills and releases, documentation of previous site inspections, RCRA closure activities and correspondence between EPA, PADEP, and the Facility.

On August 6, 2003, PADEP conducted a site visit. The visit consisted of a site tour and information gathering to assess the current status of the Facility. No obvious areas of concern were identified during the visit. Based on the comprehensive review of existing records and the site visit, EPA has determined that both EIs are under control (i.e., there is no contamination problem that creates an unacceptable risk to human health nor is there any evidence of groundwater contamination caused by the Facility). Moreover, EPA concludes that there have been no past or current releases that warrant further investigation or corrective action at the Facility at this time. Therefore, EPA proposes that no further corrective actions are necessary at the Facility at this time.

V. PUBLIC PARTICIPATION

EPA is requesting comments from the public on its proposal to require no further corrective action at the Facility at this time. The public comment period will last forty-five (45) calendar days after the public notice first appears in *The Daily Press* on September 1, 2008. Comments may be sent to EPA in writing at the address listed below.

A public hearing will be held upon request. Requests for a public hearing should be made to Mr. Griff Miller of the EPA Regional Office (215-814-3407). A hearing will not be scheduled unless one is requested.

The Administrative Record contains all information considered by EPA when making this proposal not to require further corrective measures at the Facility at this time. The Administrative Record is available at the following location:

U.S. EPA Region III
1650 Arch Street
Philadelphia, PA 19103
Hours: Mon-Fri, 8:00 AM - 4:30 PM
Contact: Griff Miller

Voice: (215) 814-3407
Fax: (215) 814-3113
E-mail: miller.griff@epa.gov

EPA may modify its decision not to require corrective actions based on new information and/or public comments. Therefore, the public is encouraged to review the Administrative Record and comment on the proposed decision presented in this document. Written comments to EPA must be received within the 45-day period ending on October 15, 2008. Following the forty-five (45) calendar day public comment period, EPA will prepare a final decision which will address all written comments and any substantive comments presented verbally at the public hearing, if a hearing is requested. This final decision will be incorporated into the Administrative Record. If the comments are such that significant changes are made to this proposal, EPA will seek public comments on the revised proposal.