UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III

STATEMENT OF BASIS

FORMER GREENE TWEED AND COMPANY
NORTH WALES, PENNSYLVANIA
EPA ID # PAD075504795

Prepared by
RCRA Corrective Action South Section
Land, Chemicals and Redevelopment Division
August 2023

Table of Contents

List of Acronyms

AR	Administrative Record
COC	Contaminant of Concern
EPA	Environmental Protection Agency
ESA	Environmental Site Assessment
FDRTC	Final Decision Response to Comments
MCL	Maximum Contaminant Level
MSC	Medium Specific Concentration
PADEP	Pennsylvania Department of Environmental Protection
PAH	Polycyclic Aromatic Hydrocarbons
RCRA	Resource Conservation and Recovery Act
RIR	Remedial Investigation Report
RSL	Regional Screening Level
SB	Statement of Basis
SHS	Pennsylvania Statewide Health Standard
SWMU	Solid Waste Management Unit
TGM	Technical Guidance Manual
TPH	Total Petroleum Hydrocarbons
UST	Underground Storage Tank
VI	Vapor Intrusion
VOC	Volatile Organic Compound

Section 1: Introduction

The United States Environmental Protection Agency (EPA or the Agency) has prepared this Statement of Basis (SB) to solicit public comment on its proposed remedy for the Former Greene, Tweed and Company (Greene Tweed) facility located at 320 Elm Avenue, North Wales, Montgomery County, Pennsylvania 19454 (Facility). Figure 1 presents a Facility location map. EPA's proposed remedy for the Facility consists of land use restrictions implemented through institutional controls (ICs) to prohibit construction of any inhabitable structures directly above the bioremediation cell unless it can be demonstrated to EPA's satisfaction that inhabitants of such structures would not be adversely impacted above risk-based indoor air concentrations via the vapor intrusion pathway. This SB sets forth information relied upon by EPA in proposing the remedy described in this SB.

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. §§ 6901 *et seq*. The Corrective Action program requires that 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 Commonwealth of Pennsylvania for the Corrective Action Program.

EPA is providing a thirty (30) day public comment period on this SB. EPA may modify its proposed remedy after considering all comments received during this period. Upon consideration of the comments received, if EPA's remedy is substantially unchanged from the one it proposed, EPA will announce its selection of a final remedy for the Facility in a Final Decision and Response to Comments (Final Decision) and inform all persons who submitted written comments or requested notice of EPA's final determination. If EPA determines that, based on public comments or new information, significant changes to the proposed remedy are warranted, EPA will modify its proposed remedy, issue a public notice explaining the new proposal, and reopen the comment period. In the Response to Comments section attached to the Final Decision, EPA will respond in writing to each relevant comment received.

Information on the Corrective Action program as well as a fact sheet for the Facility can be found on the Greene Tweed Hazardous Waste Clean Up web page.

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 9, Public Participation, below, for information on how the AR may be reviewed.

Section 2: Facility Background

Greene Tweed operated at the Facility from 1943 to 1987 as a manufacturer of gasket, packing, and sealing devices. The 3.5-acre Facility property contained two buildings during Greene Tweed's period of operations. A third building was constructed at the Facility sometime after 1987, which was the year Greene Tweed discontinued its operations at the Facility and sold it. A map showing the building locations at the Facility and other features is provided in Figure 2.

In 1981, Greene Tweed submitted Part A of a Hazardous Waste Permit application to apply for interim status under Section 3005(e) of RCRA. On August 1, 1983, the Pennsylvania Department of Environmental Resources (PADER) determined that the Facility was no longer a Treatment, Storage or Disposal (TSD) facility under its hazardous waste regulations. The Facility remains subject to the RCRA Corrective Action program. The only manufacturing process that generated hazardous waste at the Facility was the coating tower operation. Greene Tweed's operations included a coating process that consisted of submerging a 40-inch wide belt of square woven cotton cloth into a rubber cement tank to completely coat the cloth. At the end of a production order, the rubber cement remaining in the tank was disposed and the coating equipment was cleaned with toluene and possibly other solvents. All hazardous wastes (scrap rubber and solvent) were placed in 55-gallon drums and shipped off-site for disposal.

Wastes were stored in three drum storage areas on the Facility property, all of which were removed from the Facility when operations ceased in 1987. Greene Tweed operated a #6 fuel oil boiler that was also removed from the Facility when it was shut down. Two underground storage tanks (USTs) containing #6 fuel oil, toluene and possibly other solvents existed at the Facility during Greene Tweed's ownership and operations. Machine parts cleaning was periodically required for proper maintenance activities. The Facility utilized a Varsol degreaser made from petroleum distillates for this purpose. The Varsol tank required cleaning approximately once every two years and generated approximately 25-30 gallons of spent solvent.

Greene Tweed sold the Facility in October 1987 to the Elm Center Corporation. Elm Center Corporation is not known to have conducted any hazardous waste generating operations at the Facility. In 1999, the Facility property was sold to the Elm Center Condominium Association. The same year, that property was divided into nine Montgomery County tax parcels, six of which (14-00-00528-00-7 (Unit 66), 14-00-00528-31-3 (Unit 105), 14-00-00528-21-4 (Unit 101), 14-00-00528-22-3 (Unit 106), 14-00-00528-15-1 (Unit 100) and 14-00-00528-23-2 (Unit – 104)) continue to be owned by an inactive non-profit corporation, the Elm Center Condominium Association. The remaining three parcels (14-00-00528-10-6 (Unit 99), 14-00-00528-20-5(Unit 102) and 14-00-00528-30-4 (Unit 103)) correspond to the three building

footprints on the former Facility property and are owned by separate individuals or entities. The businesses occupying the three buildings may have been leasing the buildings from the Elm Center Corporation prior to 1999. Two of the buildings have been occupied by the same businesses since the Facility property was subdivided. These businesses are LIP Auto Collision (auto body repair – Unit 99) and Shannon Enterprises (realty and roofing – Unit 103). The third building (Unit 102) has housed various businesses over the years and was acquired by ATCherry LLC in February 2022. All three of the building lot owners use the Elm Center Condominium Association parcels adjacent to their buildings for parking and/or storage. Since Greene Tweed sold the Facility in 1987, none of the subsequent businesses on the Facility property has operated as a RCRA Treatment, Storage or Disposal (TSD) facility.

Section 3: Summary of Environmental Investigations/Remedial Actions

An Environmental Priorities Initiative Preliminary Assessment of Greene Tweed was completed in October 1989. The Preliminary Assessment identified four solid waste management units (SWMUs) at the Facility including hazardous waste drum storage areas, a satellite accumulation area for rubber waste, stockpiled contaminated soil and the spill from two leaking USTs containing No. 6 fuel oil, and toluene and possibly other solvents that caused the contaminated soil. The Preliminary Assessment concluded there was no evidence or record of releases from the drum storage areas or satellite accumulation area and no further investigation of those SWMUs was warranted.

Soils

In April 1986, Greene Tweed excavated contaminated soil associated with two leaking USTs including a 10,000-gallon tank containing No. 6 fuel oil and a 6,000-gallon storage tank containing toluene. Based on analytical data other solvents may have been stored in the USTs as well. The USTs were located in the Former Excavation Area depicted on Figure 2. Soil samples collected from the excavated area contained concentrations of toluene ranging from 4.5 milligrams per kilogram (mg/kg) to 1,700 mg/kg and concentrations of fuel oil ranging from 406 mg/kg to 63,500 mg/kg. Under the supervision of the Pennsylvania Department of Environmental Protection (PADEP), Greene Tweed addressed the contaminated soils on-site through a bioremediation process.

Approximately 1,700 cubic yards of contaminated soils were initially stockpiled in five separate piles before being deposited into a specially constructed lined bioremediation containment cell located south of the building on Unit 102 and east of the building on Unit 103 (see Figure 3). PADEP required final soil concentrations of less than 50 µg/kg for toluene and less than 100 mg/kg total petroleum hydrocarbons

(TPH) in order to approve the cleanup. Although the results of a few confirmation soil samples were slightly above these levels, by letter dated November 12, 1992 PADEP notified Greene Tweed that it was satisfied with the levels attained. The bioremediation cell and its contents remain at the Facility.

A Phase II Environmental Site Assessment (ESA) was completed in March 2013 for L.I.P. Collision, the current operator of the Unit 99 parcel in the southeastern portion of the Facility. Prior to their removal, the leaking USTs described above were located on a parcel of land adjacent to L.I.P Collision (See Figure 3). Nine soil borings were installed on that adjacent parcel as part of the Phase II ESA and soil samples were collected and analyzed for volatile organic compounds (VOCs) and Polycyclic Aromatic Hydrocarbons (PAHs) from eight of them. Soil boring nos. SB-1 through SB-4 were installed in the vicinity of the former UST locations. No contaminants were detected above their respective method detection limits in the samples collected from SB-1 and SB-4. Trace concentrations of chlorinated VOCs were detected in soil samples collected from SB-2 and SB-3; however, the concentrations detected were below EPA's residential direct contact Regional Screening Levels (RSLs). Trace concentrations of VOCs and PAHs were also observed in the soil samples collected at soil boring locations SB-6 and SB-8, the closest samples to the bioremediation cell; those detections were also below EPA's residential direct contact RSLs.

In May 2018, EPA, through a PADEP General Technical Assistance Contract (GTAC), installed soil borings and collected soil samples to determine whether soils within the bioremediation cell were in compliance with EPA's residential risk levels. Eight soil samples (including one duplicate) were collected from seven boring locations within the bioremediation cell. One soil sample was collected from a soil boring background location near the northeast corner of the Facility property. Soil boring/sampling locations are depicted on Figure 2. The soil samples were analyzed for VOCs, SVOCs and metals. All contaminants detected were found to be at concentrations within EPA's allowable risk range for residential direct contact. Arsenic was detected above PADEP's Statewide Health Medium Specific Concentrations (MSC) of 22 mg/kg for direct contact to residential soils in one soil sample. The arsenic concentration fell within the naturally occurring range in the northeastern U.S., and a duplicate sample collected at the same location contained arsenic below the MSC, thus, neither EPA nor PADEP concluded the first sampling result for arsenic demonstrated a risk to human health or the environment.

Groundwater

The Facility is located within the Gettysburg-Newark Lowlands section of the Piedmont Physiographic Province and is underlain by the sedimentary rocks of the Lockatong Formation and lower beds of the Brunswick Group of the Newark Supergroup. The Lockatong Formation is comprised of alternating layers of shale, siltstone and dolomitic mudstones. The soils beneath the Facility are described as

"Made Land," and were formed as a result of altering and mixing soils of weathered shale and siltstone.

The Facility is located approximately 0.25 miles southeast of EPA's North Penn Area 7 Superfund Site (North Penn 7). Several geologic and hydrogeologic studies conducted to investigate North Penn 7, along with Facility-related soil boring data, can be used to determine the approximate depth to groundwater and the direction of groundwater flow at the Facility. Precipitation at the Facility likely infiltrates through the soil and saprolite until it reaches competent bedrock at depths of 12 feet or less. Groundwater in the shallowest part of the bedrock aquifer may be under unconfined or partially unconfined conditions. The depth to static groundwater at the Facility is estimated to be 30 feet below the ground surface (bgs). Based on local topography and a groundwater elevation contour map prepared by the U.S. Geological Survey for North Penn 7, shallow groundwater from beneath the Facility flows west toward the Wissahickon Creek.

The nearest public supply well is located approximately 1.5 miles northwest of the Facility. No private domestic wells are known to exist in the vicinity of the Facility. North Wales Borough and the surrounding area are served potable water from the North Wales Water Authority.

While there are no groundwater monitoring wells on the Facility, a production well used for process water at the Facility (depth unknown) was sampled for priority pollutants in May 1987. The only detections in the groundwater sample were phenolics (1.3 µg/l) and zinc (163 µg/l), both of which were well below EPA Region 3's tap water RSLs of 5,800 µg/l for phenol and 23,000 µg/l for zinc. EPA's National Secondary Drinking Water Standard for zinc is 5,000 µg/l.

The only potential release of hazardous contaminants to groundwater at the Facility was associated with leaking USTs that once contained toluene, No. 6 fuel oil and possibly other solvents. The USTs were removed from the Facility in 1986 and all visibly impacted soils were stockpiled and subsequently placed into the bioremediation cell that was closed with PADEP approval in 1992.

As described above, in March 2013, L.I.P. Collision completed a Phase II ESA. The trace concentrations of chlorinated VOCs detected in soil samples collected from SB-2 and SB-3 were below both EPA's risk-based residential direct contact RSLs and EPA's soil screening levels (SSLs) for the protection of groundwater (assuming a dilution factor of 20 for the SSL calculation). A dilution factor of 20 can be used for source areas up to 0.5 acres in size and is suitable for this evaluation because no source areas are known to currently exist at the Facility. Trace concentrations of VOCs and PAHs were also observed in samples SB-6 and SB-8 located in the vicinity of the bioremediation cell, but again, all detections were below EPA's residential direct contact RSLs and all detections except for benzo(a)anthracene in the soil sample

collected from SB-6 were below their respective SSLs (assuming a dilution factor of 20). The concentration of benzo(a)anthracene in SB-6 (0.27 mg/kg) was only slightly above the SSL of 0.22 mg/kg (0.011 mg/kg multiplied by the dilution factor of 20) and is well within EPA's allowable risk range for carcinogens. Additionally, benzo(a)anthracene was not detected in six of the eight soil samples analyzed in the assessment. None of the detected contaminants in any of the soil samples collected in 2013 as part of the Phase II ESA were observed above their respective PADEP soil to groundwater medium-specific concentrations (MSCs) for residential used aquifers.

As mentioned above soil samples collected during the EPA May 2018 sampling event did not contain any contaminants above EPA's allowable risk range for residential direct contact. However, tetrachloroethylene (PCE) was detected at concentrations ranging from 0.31 mg/kg to 0.89 mg/kg in seven soil samples collected from within the bioremediation cell, which exceeds the SSL of 0.102 mg/kg (5.1×10^{-3} mg/kg multiplied by a dilution factor of 20). A release of PCE to groundwater is not suspected because the bioremediation cell is an engineered structure with a liner to prevent cross contamination between soils within the cell and media outside the cell.

Based on the above, EPA has determined that no further investigation of groundwater beneath the Facility is needed. No receptors relying on groundwater for drinking water purposes in the vicinity of the Facility have been identified.

Surface Water and Sediment

Most stormwater runoff on the Facility property drains to the west towards the Wissahickon Creek approximately ½ mile from the Facility. The Wissahickon Creek is a major tributary to the Schuylkill River. Due to the distance from the Facility as well as the containment of all known contaminants with concentrations above their respective SSLs in a lined bioremediation cell, EPA has determined that no further investigation of Facility-related impacts to surface water and sediment are necessary.

Indoor Air

Since EPA has determined that no further investigation of groundwater beneath the Facility is needed, the groundwater to indoor air pathway on the Facility property and surrounding properties is not of concern. The only known/documented releases of hazardous substances to soils on the Facility property were those associated with the leaking USTs described above.

The PCE detected in soil samples collected within the bioremediation cell by EPA in 2018 ranged in concentration from 0.31 mg/kg to 0.89 mg/kg. While these concentrations are below EPA's direct contact RSL of 24 mg/kg, five of the seven detections were above PADEP's Statewide Health Standard (SHS) Vapor Intrusion Screening Value of 0.43 mg/kg. Therefore, the vapor intrusion pathway may be of

concern if an inhabitable building is constructed above the bioremediation cell without appropriate vapor mitigation controls.

Section 4: Environmental Indicators

Under the Government Performance and Results Act (GPRA), EPA has set national goals to address RCRA corrective action facilities. Under GRPA, EPA evaluates two key environmental clean-up indicators for each facility: (1) Current Human Exposures Under Control and (2) Migration of Contaminated Groundwater Under Control. EPA has determined that the Facility met the current human exposures under control indicator on September 30, 2014. This determination holds true so long as a new building over the bioremediation cell is not constructed. On September 22, 2017, EPA determined that the Facility met the Migration of Contaminated Groundwater Under Control indicator.

Section 5: Corrective Action Objectives

EPA's Corrective Action Objectives have largely been met at the Facility. EPA has determined that no further investigation of groundwater, surface water and sediment is necessary. Soils at the Facility meet EPA's residential RSLs for direct contact. The only remaining pathway of concern at the Facility is the potential for indoor air to be impacted by volatile organic compounds (primarily PCE) originating from soils within the bioremediation cell. Therefore, EPA's Corrective Action Objective is to prevent exposure to unsafe levels of hazardous constituents in the indoor air of any future inhabitable structures built partially or fully above of the bioremediation cell.

EPA has identified the following Corrective Action Objectives for the Facility:

A. Indoor Air

Based on 2018 soil sampling results showing concentrations of PCE within the bioremediation cell exceeded PADEP's Soil Statewide Health Standard (SHS) Vapor Intrusion Screening Value, EPA has determined that a complete vapor intrusion pathway could exist above the bioremediation cell if an inhabitable structure is constructed without an approved vapor mitigation system above the cell in the future. Accordingly, EPA's Corrective Action Objective for Indoor Air above the bioremediation cell is to prevent exposure to PCE remaining in the cell.

B. Soil

EPA's Corrective Action for soil is to prevent human exposure to contaminant concentrations above the EPA allowable risk range of $1x10^{-4}$ to 1x10 and non-cancer HI of 1 for a residential exposure scenario.

C. Groundwater

EPA expects final remedies to return groundwater to its maximum beneficial use, where practicable, within a timeframe that is reasonable. For facilities where aquifers are either currently used for water supply or have the potential to be used for water supply, EPA uses federal 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 C.F.R. Part 141 as a corrective action objective for groundwater. Based on the groundwater data collected from the on-site production well, MCLs have been attained at the Facility.

Section 6: Proposed Remedy

EPA's proposed remedy for the Facility consists of the following components:

A. Indoor Air

EPA's proposed remedy includes the implementation and maintenance of a land use restriction to address the vapor intrusion pathway prior to construction of any inhabitable building above any portion of the bioremediation cell. A vapor intrusion mitigation system, the design of which shall be approved in advance by EPA, shall be installed in each new structure constructed above the bioremediation cell, unless it is demonstrated to EPA that vapor intrusion does not pose a threat to human health and EPA provides prior written approval that no vapor intrusion mitigation system is needed. The use restriction will be implemented in an institutional control such as an order and/or an Environmental Covenant pursuant to the Pennsylvania Uniform Environmental Covenants Act, 27 Pa. C.S. Sections 6501-6517 (UECA) to be recorded with the deed for the Facility property.

B. Soil

EPA's proposed remedy for Facility soils is Corrective Action complete with controls. All soils, including those within the bioremediation cell, are within or below EPA's allowable risk range for direct contact for residential soils. Because soils within the bioremediation cell may result in a vapor intrusion issue if inhabitable buildings are built on top of the bioremediation cell or may impact groundwater if removed from the bioremediation cell and placed elsewhere at the Facility or off-site, disturbance of the

bioremediation cell soils for any reason other than further treatment, investigation or excavation with proper disposal will be prohibited without prior written EPA approval.

C. Groundwater

EPA's proposed remedy for Facility groundwater is complete without controls. EPA has concluded that groundwater beneath the Facility has not been impacted by historic Greene Tweed operations and that residual soil contamination remaining within the bioremediation cell is incapable of impacting groundwater because of the impermeable liner installed below the treated soils within the cell.

Section 7: 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	The only remaining threat to human health and the environment is associated with the potential for exposures to unsafe levels of VOCs due to vapor intrusion in the indoor air of a future building constructed above the bioremediation cell. The proposed remedy eliminates this threat by prohibiting construction of buildings above the bioremediation cell prior to demonstrating to EPA it is safe to do so.
2) Achieve media cleanup objectives	EPA's proposed remedy meets the media cleanup objectives based on assumptions regarding current and reasonably anticipated future land and water resource use(s). While the Facility is currently being used for commercial purposes, groundwater and soils at the Facility property are suitable for residential purposes with the exception of the need for more investigation or application of vapor mitigation controls on any proposed construction intended for human occupancy above any portion of the bioremediation cell.

3) Control the Source of Releases	The only known releases of hazardous substances at the Facility are associated with leaking USTs in the southeast portion of the Facility property that occurred at an unknown time and contaminated soils at the Facility. Those soils were excavated and placed into the bioremediation cell where they were chemically treated to stabilize the contaminants and prevent their migration to soil and groundwater outside the cell. PADEP approved of the cleanup in correspondence dated November 12, 1992.
Balancing Criteria	Evaluation
4) Long-term effectiveness	The proposed land use restriction will maintain protection of human health and the environment over time by ensuring inhabitable structures are not built upon the bioremediation cell unless it is demonstrated to EPA that vapor intrusion does not pose a threat to human health inside those structures or vapor mitigation systems, the design of which shall be approved in advance by EPA, are installed in the structures. There is no pathway for PCE contamination within the cell to impact existing buildings on or outside the Facility. Direct contact with soils within the cell and throughout the Facility poses no significant risk to human health or the environment. EPA anticipates that the use restriction may be implemented through an instrument such as an environmental covenant or other form of institutional control that would be recorded in the chain of title for the Facility property on which the bioremediation cell is located, thereby preventing current and future owners from conducting activities that could disturb or be inconsistent with the selected remedy. Such a land use restriction will run with the land and as such will be enforceable by EPA against future landowners.
5) Reduction of toxicity, mobility, or volume of the Hazardous Constituents	The reduction of toxicity, mobility and volume of hazardous constituents at the Facility has already been achieved by the consolidation and treatment of soils impacted by the leaking USTs in the bioremediation cell. The remaining contamination in the cell poses no direct contact risk or threat to groundwater.

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.
7) Implementability	EPA's proposed remedy is readily implementable. The bioremediation cell is located on parcels owned by the Elm Center Condominium Association, a non-profit corporation established in Montgomery County in 1999. Figure 3 provides the location of the bioremediation cell with respect to current Montgomery County Tax Parcels. The only known officer for the Elm Center Condominium Association passed away in February 2013. EPA has to date been unsuccessful in identifying any individual(s) authorized to make decisions for Elm Center Condominium Association. If an authorized representative is not found, EPA may request that PADEP use its authority pursuant to Sections 512(a) and 1102 of the Pennsylvania Hazardous Sites Cleanup Act to place the proposed land restriction on the bioremediation cell parcels.
8) Cost	EPA's proposed remedy is cost effective. The costs associated with the Facility cleanup have already been incurred and the costs of drafting and recording a land use restriction are minimal.
9) Community Acceptance	EPA will evaluate community acceptance of the proposed remedy during the public comment period and will address comments received in the Final Decision and Response to Comments.
10) State/Support Agency Acceptance	PADEP approved of the bioremediation cell cleanup in November 1992, before the existence of a vapor intrusion section in the Department's Land Recycling Program Technical Guidance Manual (TGM), which was last revised on January 19, 2019. Based on the findings of the May 2018 sampling event, PADEP's TGM would have required further vapor intrusion related assessment similar to what EPA is proposing in this Statement of Basis. EPA may require PADEP's assistance to place the proposed land use restrictions on the bioremediation cell parcels if an individual authorized to make decisions for the Elm Center Condominium Association is not found.

Section 8: Financial Assurance

EPA has evaluated whether financial assurance for corrective action is necessary to implement EPA's proposed decision at the Facility. Given that EPA's proposed decision does not require any further engineering actions to remediate soil, groundwater or indoor air contamination at this time and because the costs of implementing institutional controls, such as permits, orders or environmental covenants at the Facility will be minimal, EPA is proposing that no financial assurance be required.

Section 9: Public Participation

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
Four Penn Center
1600 John F. Kennedy Blvd.
Philadelphia, PA 19103
Contact: Andrew Clibanoff
Phone: (215) 814-3391
Email: clibanoff.andrew@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 Mr. Andrew Clibanoff. EPA will hold a public meeting to discuss this proposed decision upon request. Requests for a public meeting should be made to Mr. Andrew Clibanoff.

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 Mr. Andrew Clibanoff at the address listed above.

Date:

DANA AUNKST Digitally signed by DANA AUNKST Date: 2023.08.04 07:51:33 -04'00'

Dana Aunkst, Director
Land, Chemicals and Redevelopment Division
US EPA, Region III

Element Concentrations in Soils and Other Surficial Materials of the Conterminous United States, U.S. Geological Survey Professional Paper 1270, U.S. Government Printing Office, 1984.

Articles of Incorporation-Domestic Nonprofit Corporation, Elm Center Condominium Association, Peter Lowenthal – Incorporator, Filed with Department of State, July 12, 1999.

Final Environmental Indicator Inspection Report for Greene Tweed & Co., 320 Elm Street, North Wales, Montgomery County, Pennsylvania 19454, prepared by Tetra Tech FW, Inc., October 2003

Phase II Environmental Site Assessment, L.I.P. Collision, 320 Elm Avenue, North Wales Borough, prepared by Brickhouse Environmental, March 6, 2013.

Investigations of the Groundwater System and Simulation of Regional Groundwater Flow for North Penn Area 7 Superfund Site, Montgomery County, Pennsylvania, Scientific Investigations Report 2013-5045, Version 1.1, prepared by U.S. Geological Survey, April 2015.

Laboratory Data Report, Project: Green Tweed & Co., Lab Project No. 8052424, prepared by Hampton-Clarke Analytical & Field Services, June 19, 2018.

Property Records Search Results for 320 Elm Avenue, North Wales, PA, Montgomery County (https://propertyrecords.montcopa.org/), web search completed on July 25, 2023.

Figures