

July 5, 2019

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or call 1-800-222-1811.

Peter Fritchman, President **Arbonite Corporation** 3826 Old Easton Road Doylestown, PA 18901

Re:

Easton Road PFC Site

Doylestown, Plumstead, and Buckingham Townships, Bucks County

Dear Mr. Fritchman:

The Pennsylvania Department of Environmental Protection (DEP) is seeking information concerning a release and/or threat of release of hazardous substances or contaminants into the environment at the Easton Road PFC Site in Doylestown, Plumstead, and Buckingham Townships, Bucks County, Pennsylvania (Site). Our information indicates that Arbonite Corporation (Arbonite) currently owns, is located on, and operates on a property (the Property) located near the Site.

DEP believes that Arbonite may have information relevant to the release of hazardous substances or contaminants, specifically perfluorooctanoic acid (PFOA) and perfluorooctane sulfonate (PFOS), at the Site. PFOA and PFOS are known chemicals found in Aqueous Film-Forming Foam (AFFF) which is commonly used in firefighting practices. There is documented use of AFFF during a fire at the Property in November 2012. Therefore, pursuant to Section 503 of the Pennsylvania Hazardous Sites Cleanup Act (HSCA), Act of October 18, 1988, 35 P.S. Section 6020.503, DEP requests that you furnish all the information and documents in your possession, custody or control, or in the possession, custody or control of the officers, employees or agents of Arbonite, which concern, refer to or relate to hazardous substances or contaminants, as those terms are defined by Section 103 of HSCA, 35 P.S. Section 6020.103, which may have been generated, treated, stored, disposed, transported to, or released at the Property.

Specifically, your response to this request should include, but not be limited to, the following:

1. Documentation regarding the types and quantities of hazardous substances, contaminants, or materials containing hazardous substances or contaminants, which were disposed of. stored, treated, spilled or released into the soil, groundwater or surface water at the Property. Please use specific chemical names rather than generic terms, such as "solvents" or "liquid wastes." Please also describe the manner and the location in which any of the above materials were disposed of, stored, treated, spilled or released into the

soil, groundwater or surface waters at the Property. Within your response, please include documentation regarding the use or release of the group of chemicals known as Per- and poly-flourinated alkyl substances (PFAS), including but not limited to PFOS and PFOA, including such chemicals that may have been contained in AFFF that may have been used by the fire department and others to respond to fires on the Property.

- 2. Documentation regarding the approximate dates such hazardous substances, contaminants, or materials containing hazardous substances or contaminants, were disposed of, stored, treated, spilled or released at the Property.
- 3. Documentation concerning how such hazardous substances, contaminants, or materials containing hazardous substances or contaminants, were treated, transported to, stored or disposed of at the Property.
- 4. Documentation regarding the identity and address of any other person or company which generated, treated, stored, transported or disposed of hazardous substances, contaminants, or materials containing hazardous substances or contaminants, at the Property.
- 6. Documentation regarding any groundwater wells present at the Property and/or the Site that may be sampled to provide information on the presence of hazardous substances or contaminants or materials containing hazardous substances or contaminants, at the Property and/or the Site. This should include any well construction information and the results of any previous sampling.
- 6. Documentation regarding the assets and liabilities of Arbonite.
- 7. Documentation related to the fire at the Arbonite facility in November 2012, including but not limited to, any official reports, location of where the fire was confined to, where AFFF was used on the Property, and how the Property was cleaned up following the incident.

As used herein, the term "documents" includes, but is not limited to, writings (handwritten, typed, or otherwise produced or reproduced), any invoices, checks, receipts, bills of lading, weight receipts, toll receipts, correspondence, offers, contracts, agreements, deeds, leases, manifests, licenses, permits, bids, proposals, logs, books of original entry, minutes of meetings, memoranda, notes, calendar or diary entries, agendas, bulletins, notices, announcements, charts, maps, photographs, drawings, manuals, brochures, reports of scientific study or investigations, schedules, price lists, telegrams, teletypes, phone-records, magnetic voice or video records, tapes, summaries, magnetic tapes, punch cards, recordings, disks, computer printouts, or data compilations from which information can be obtained or translated.

Please be advised that, except as provided in Section 503(h) of the HSCA, 35 P.S. § 6020.503(h), records, reports, or other information obtained under the Act may be made available to the public

for inspection or copying during regular business hours. DEP may, upon request, designate records, reports or information as confidential, when the person providing such information demonstrates the need for confidentiality pursuant to the requirements under Section 503(h) of the HSCA, 35 P.S. § 6020.503(h).

The above-requested information should be sent directly to Joshua Crooks, Hazardous Sites Cleanup Program, Bureau of Waste Management, at the address located in the first page footer, within <u>30</u> days of receipt of this letter.

This letter, issued under DEP's authority to obtain information, is neither a final action nor an order, and gives you no right of appeal. If you do not provide the requested information, however, DEP may issue an order against you or take other appropriate legal action. Any destruction or alteration of the documents requested in this letter may subject you to criminal penalties under Section 1105(c) of the HSCA, 35 P.S. § 6021.1105(c).

If you have any questions regarding the above, please contact Joshua Crooks at 484.250.5784 or, if you are represented by counsel in connection with this matter, please ask your attorney to contact Brian Glass Esq. at 484.250.5870.

Sincerely,

Bonnie McClennen

Environmental Group Manager

Environmental Cleanup & Brownfields

cc:

J. Crooks-PADEP (electronic)

B. Glass Esq.-PADEP (electronic)

Doylestown Township

Plumstead Township

**Buckingham Township** 

**Bucks County Health Department** 

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