



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

U.S. EPA-REGION 3-RHC
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Office of Regional Counsel

*Andrew S. Goldman (3RC10)
(215) 814-2487
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January 14, 2020

VIA UPS OVERNIGHT & EMAIL

Turog Properties, Limited
c/o Heywood Becker
5382 Wismer Road
Pipersville, PA 18947

**Re: Chem Fab Superfund Site, Doylestown, Bucks County,
Pennsylvania: Lien Proceeding CERC 03-2019-0111LL**

Dear Mr. Becker:

By letter dated December 1, 2019, but not received by me until I received your January 6, 2020 email, you requested copies of documents described as follows:

1. “[A]nalytical results of the May, 1995 TAT members collection of soil samples at 6 foot depths, the same having been shipped to be analyzed for hexavalent chromium;”
2. The further analysis and/or sampling after TAT reviewed soil sample analytical results, finding trace amounts of contaminants as stated on Wednesday, August 30, 1995;” and
3. “Any and all statements by the EPA, or any representative of the EPA, after the OSC After-Action Report, concerning the existence of

contamination at the Site, and/or any and all remediation work to be yet done, or completed, whether as press reports, statements, releases or the like.”

By email on January 10, 2020, I asked the following question with respect to request number 3, above:

“Given the context of your request (looking for documents that would have alerted Turog to the disposal of hazardous substances prior to its acquisition of the property) would it be accurate to conclude you are looking for material created after issuance of the OSC Report and before Turog acquired the property? If so, can you identify the date on which Turog acquired (your July 17, 2019 letter indicates that this occurred in 1998 but does not specify [sic] a date).”

By email later that day, you responded:

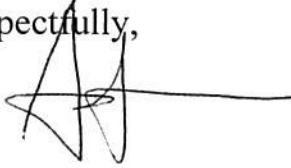
“I believe the tax sale was in the second week of September, 1998. So, any such documents prior thereto.”

After a reasonable search of EPA electronic record system, I provide the following response to your request:

1. Enclosed find a compact disc containing a report submitted EPA contractor Roy F. Weston, Inc.
2. We have been unable to locate any further analysis or testing performed pursuant to TAT’s recommendation on August 30, 1995. I note that at some point in or around 1998, the Commonwealth of Pennsylvania resumed responsibility for the Chem Fab Site and retained lead agency status until 2007 or 2008. Presently, EPA is conducting a Remedial Investigation/Feasibility Study for the Chem Fab Site.
3. We have been unable to locate any documents meeting your description, as modified by agreement.

If you have further questions, please contact me at (215) 814-2487 or goldman.andrew@epa.gov.

Respectfully,

A handwritten signature in black ink, appearing to be 'A. Goldman', with a long horizontal line extending to the right.

ANDREW S. GOLDMAN
Sr. Assistant Regional Counsel

Enclosure: CD/SEMS Doc. No. 2097519

cc: RJO Joseph Lisa (letter only)

Docket No. CERCLA 03-2019-0111LL

CERTIFICATE OF SERVICE

I hereby certify that a copy of the documents identified below were provided to the following persons:

By Overnight Mail and Email:

Turog Properties, Limited
c/o Heywood Becker
5382 Wismer Road
Pipersville, PA 18947

By Hand Delivery:

Joseph Lisa (3RC00)
Regional Judicial Officer
U.S. Environmental Protection Agency
1650 Arch Street
Philadelphia, PA 19103

Documents Provided	
1.	Letter from Andrew Goldman to Turog Properties, Limited, re: Chem Fab Superfund Site, Doylestown, Bucks County, Pennsylvania: Lien Proceeding CERC 03-2019-0111LL (January 14, 2020).



Andrew S. Goldman, Esquire
Sr. Assistant Regional Counsel

1/14/2020

Date