

**Long Term Stewardship Report  
ICI Americas  
1 River Road, Tamaqua, PA 18252**

EPA web fact sheet : <http://www.epa.gov/reg3wcmd/ca/pa/webpages/pad000797928.html>

**September 30, 2015**

**A. Pre-Inspection Items**

Prior to the site visit, the following pertinent documents were reviewed to ensure remedial components are adequate and up to date:

1. 09/28/2007 EPA FDRTC
2. 09/17/2003 PADEP/ICI Agreement Letter

In addition, financial assurance state of the facility was confirmed; EPA fact sheets, links and mapping documents were reviewed and updated; and a site visit was coordinated with the facility and PADEP. A meeting with the Walker Township officials will be scheduled at a future date.

**B. Site visit 08/13/2015**

1. Attendees

<b>Name</b>	<b>Affiliation</b>	<b>Phone</b>	<b>Email</b>
Linda Matyskiela	EPA Proj Mgr	215.814.3420	Matyskiela.Linda@epa.gov
Alex Zdzinski	PADEP – NERO PG	570.826.2511	azdzinski@pa.gov
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Mark T Smith	Element Env. Geologist	717.808.3524	mark@e2s.us

2. Introductions and purpose of visit

3. File review

Does the facility have a copy of:

- a. 09/28/2007 EPA FDRTC Y X N
- b. 09/17/2003 PADEP/ICI Agreement Letter Y X N
- c. Any Act 2 monitoring plan? Y      N X
- d. Any Act 2 field work plan? Y      N X

**Note: Facility is interested in using Act 2 program and has accomplished some additional GW investigation. Data will be available to agency upon completion of field work.**

4. Site Walk

a. Assess locations and conditions of network well components:

- 1. Is there a geo-locational map (CAD map?) **not yet – will be available after completion of additional field work**

2. Well Network

Sampling Point	Location? do we have survey data?	Condition
Annual monitoring		
MW-8C		
MW-19		
MW-20		
MW-24		
5-year monitoring		
MW-1		
MW-7C		
MW-8C		
MW-16		
MW-17		
MW-19		
MW-20		
MW-21A		
MW-24		
MW-25		

**All annual and 5-year monitoring wells were in good condition. EPA and PADEP suggested that identification of wells be placed on the exterior (paint, metal tag, etc) in addition to interior. Currently identification is only under cap. Survey data is from time of well installation. Facility has well placement of CAD map which will be available at submission of additional field data.**

5. Questions/discussion:

1. There is deed restriction language. Is there a plan for a covenant for the property?

**ICI sold property to new owners before covenants were common. Deed language of land and groundwater use restrictions in deeds of current owners. Covenant is being discussed.**

2. Is Akzo Nobel interested in discussing a covenant for the property?

**See 1.**

3. Are there any other ordinances that put restrictions on land use or GW use?

**EPA 2007 FDRTC restricts land use to non-residential and GW use to non-potable and non-agricultural. No municipal ordinances put restrictions on use.**

4. Any modification to pump and treat needed? anticipated?

**Facility wants to accelerate GW cleanup. They would like to discuss options after new field data is submitted.**

5. Any GIS info/data still needed by EPA? PADEP?

**Yes – EPA does not currently have property boundaries at sale to new owners. Facility is aware and will submit these.**

6. Most recent O&M Plan Date? Do we need an update?

**Facility has worked with PADEP on GW sampling issues. New O&M Plan will be discussed upon submission of new field data.**

7. Next steps at GW plume area?

**Await field data with goal of accelerating GW cleanup to satisfy RCRA, Corrective Action and Act 2.**

8. Timeline on facility next steps.

**No timeline discussed. Voluntary field work.**

9. PADEP program next step. Which program?

**Await field data with goal of incorporating Act 2 if feasible with current GW condition.**

10. Timeline on PADEP next steps?

**See 8.**

11. FA obligations up to date? Bond amount?

**Bond is with PADEP – up to date.**