



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III

STATEMENT OF BASIS

OMNOVA SOLUTIONS, INC.
JEANNETTE, PENNSYLVANIA
EPA ID # PAD 004338000

Prepared by
Office of Pennsylvania Remediation
Land and Chemicals Division
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Section 1: Introduction

The United States Environmental Protection Agency (EPA) has prepared this Statement of Basis (SB) to solicit public comment on its proposed decision for the Omnova Solutions, Inc. facility located at 1001 Chambers Avenue, Jeannette, Pennsylvania 15644 (Facility). EPA's review of available information indicates that there are no unaddressed releases of hazardous waste or hazardous constituents from the Facility. Based on that assessment, EPA's proposed decision is that no further investigation or cleanup is required. EPA has determined that its proposed decision is protective of human health and the environment and that no further corrective action or land use controls are necessary at this time. This SB highlights key information relied upon by EPA in making its proposed decision.

The Facility is subject to EPA's Corrective Action Program under the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act (RCRA) of 1976, and the Hazardous and Solid Waste Amendments (HSWA) of 1984, 42 U.S.C. §§ 6901 et seq. (Corrective Action Program). The Corrective Action Program is designed to ensure that certain facilities subject to RCRA have investigated and cleaned up any releases of hazardous waste and hazardous constituents that have occurred at their property. The Commonwealth of Pennsylvania (Commonwealth) is not authorized for the Corrective Action Program under Section 3006 of RCRA. Therefore, EPA retains primary authority in the Commonwealth for the Corrective Action Program.

EPA is providing a 30-day public comment period on this SB and may modify its proposed decision based on comments received during this period. EPA will announce its selection of a final decision for the Facility in a Final Decision and Response to Comments (Final Decision) after the comment period has ended. The Administrative Record (AR) for the Facility contains all documents, including data and quality assurance information, on which EPA's proposed decision is based. See Section 4, Public Participation, for information on how you may review the AR.

Section 2: Facility Background

The Facility is located at 1001 Chambers Avenue in the town of Jeannette, Westmoreland County, Pennsylvania 15644. A Facility location map is attached as Figure 1.

Omnova Solutions, Inc. is the current owner/operator of the Facility operating under a hazardous waste large quantity generator permit, air permit, and stormwater permit. The Facility has over a hundred years of industrial history that began with the manufacture of rubber products and is currently used as a polyvinyl chloride (PVC) film/sheeting manufacturing facility for various applications. The Facility is located on approximately 28 acres of land and consists of 34 buildings.

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Wastes historically produced at the facility included spent methyl ethyl ketone (also identified as 2-butanone) (MEK), polychlorinated biphenyls (PCBs)-containing oils, scrap printing ink, vinyl resin, and pigment mixture. Unused MEK was sent to the Toledo plant for distillation and reclamation. No hazardous wastes are generated from the production of PVC; and off-spec plasticizers and solvents are sent back to suppliers.

Section 3: Summary of Environmental History

The 1991 Environmental Priorities Initiative Preliminary Assessment (PA) performed by NUS Corporation for the EPA identified thirteen solid waste management units (SWMUs) and six Areas of Concern (AOCs). SWMUs were primarily waste accumulation areas ranging from small satellite accumulation areas to entire buildings. Additionally SWMU-8 was a 198,000 gallon oil separation reservoir used to remove oils that leaked from the facility's production machinery into the cooling water prior to treatment and discharge through a National Pollutant Discharge Elimination System permitted outfall. AOCs were all underground storage tanks (USTs) containing fuel oils and product.

There have been no reports of major spills or releases at the facility from either the SWMUs or the AOCs. A May 19, 1994 Spill Incident Report described the release of approximately 50 gallons of an ink mixture containing pigment, solvent, and other additives on to a paved area, with some overflow on an adjacent grass facility. The liquid was recovered and the affected soil was removed.

USTs were all removed under the Pennsylvania Department of Environmental Protection (PADEP) oversight/guidance between 1989 and 2007 in accordance with the approved PADEP UST program. All USTs were either hydrostatically tested and found to be in good condition or had impacted soils which were removed until confirmatory sampling indicated concentrations met regulatory limits.

Oils accumulated in SWMU-8 were analyzed and found to contain PCB concentrations in the range of 50 to 100 parts per million (ppm). After they were skimmed from the surface of the water, the waste oils were transferred by metal pail into 55-gallon steel drums and stored as hazardous waste. SWMU-8 was removed in the 1990s and the main electrical substation for the facility was constructed on a concrete pad at this location. At the time of its removal, the integrity of the SWMU was found to be intact. Minimal oil-stained areas of concrete were observed around the drums containing the skimmed oil during the PA and stained surface soils were removed and disposed of at an off-site landfill during SWMU-8s closure.

The Pennsylvania Department of Environmental Protection (PADEP) and Michael J. Baker Inc. visited the Facility on September 22, 2009 as part of the Environmental Indicator (EI) process and to document the findings described above. Based upon this Facility visit and information in

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the EI Inspection Report, EPA considers the spills and releases to have been remediated appropriately and protection of human health and the environment to have been achieved.

Section 4: 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
1650 Arch Street
Philadelphia, PA 19103
Contact: Kevin Bilash
Phone: (215) 814-2796
Fax: (215) 814-3113
Email: bilash.kevin@epa.gov

Interested parties are encouraged to review the AR and comment on EPA's proposed decision. The public comment period will last thirty 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. Kevin Bilash. EPA will hold a public meeting to discuss this proposed decision upon request. Requests for a public meeting should be made to Mr. Kevin Bilash.

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. Kevin Bilash at the address listed above.

Date: _____

John A. Armstead, Director
Land and Chemicals Division
US EPA, Region III

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Preliminary Assessment, NUS Corporation, July 29, 1991

Environmental Indicator Inspection Report for OMNOVA Solutions, Inc., 1001 Chambers Avenue, Jeannette, Pennsylvania 15644, prepared by Michael Baker Jr., Inc., December 2010.

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