

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III

STATEMENT OF BASIS
DRAFT PERMIT
FOR CORRECTIVE ACTION

WASHINGTON RESEARCH CENTER
7500 GRACE DRIVE
COLUMBIA, MARYLAND 21044
EPA ID NO. MDD074933961

I. Introduction

The United States Environmental Protection Agency (EPA) is proposing to issue a permit (Draft Permit) for Corrective Action under the Resource Conservation and Recovery Act of 1976, as amended by the Hazardous and Solid Waste Amendments of 1984 (RCRA), 42 U.S.C. §§ 6901-6992k, for the facility owned and operated by W. R. Grace & Co.-Conn. (W.R. Grace or Permittee) and located at 7500 Grace Drive in Columbia, Maryland (Facility). Pursuant to 40 C.F.R. § 124.7, EPA has prepared this Statement of Basis (SB) to explain to the public the background and basis for the Draft Permit.

The Draft Permit consists of three (3) sections: The Introduction which sets forth the legal authority for issuing the Draft Permit in final form, Part I which contains standard conditions applicable to all hazardous waste management facilities, and Part II which contains Facility specific conditions that address corrective action obligations at the Facility.

II. Facility Background

The Facility is located in Columbia, Maryland, northeast of Route 32 and north/northwest of Cedar Lane. The Facility consists of approximately 125 acres, including landscaped grassy areas; office, research and support buildings; two ponds, and wooded areas. The Middle Patuxent River is located just east of the Facility. See Attachment A of the Draft Permit for a Facility map.

W.R. Grace operated a research and development facility, known as the Washington Research Center, at the Facility from the late 1950s until the late 1990s, when W.R. Grace's Davison Chemical Division and Davison Chemical corporate headquarters moved to the Facility. During the 1960s, W.R. Grace burned and disposed of wastes in an area referred to as the Former Landfill Area located in the northeast area of the Facility. The Former Landfill Area covers approximately 7000 square feet. In 1985, W.R. Grace removed and disposed of waste from the Former Landfill Area and closed

the landfill.

W.R. Grace used a former drum storage area, which is located west and north of Building 16, for the collection, staging and storage of drummed solvent wastes. Leaking drums in the storage area are believed to have been the source of groundwater contamination at the Facility. In 1986, W.R. Grace detected volatile organic compounds, including trichloroethene and its degradation products, in drinking water wells SW8 and SW9 at the Facility. Those wells were subsequently shut down and the Facility is now supplied with public water.

On July 10, 1992, EPA issued a HSWA Corrective Action Permit (EPA I.D.# MDD074933961) to the Permittee under the authority of Section 3004(u) RCRA, 42 U.S.C. Section 6924(u) (Original Permit). The Original Permit, which on its terms expired on August 14, 2002, was administratively continued under 40 C.F.R. Section 270.51. EPA issued two subsequent permit modifications in 2007 and 2016, respectively. The 2007 Permit Modification became effective on November 30, 2007 (First Permit Modification) and the 2016 Permit Modification (Second Permit Modification) became effective on January 1, 2016. The Original Permit, as modified by the First and Second Permit Modifications, shall remain in effect until November 30, 2017 unless revoked and reissued, modified or terminated in accordance with 40 C.F.R. §§ 270.41, 270.42, and 270.43 or continued in accordance with 40 C.F.R. § 270.51(a).

The Original Permit contained standard permit conditions as well as the requirement to conduct a RCRA Facility Investigation (RFI) to, among other things, characterize the nature, extent, concentration and rate of migration of releases of hazardous waste or hazardous constituents from each SWMU into groundwater, surface water and/or soil.

The First Permit Modification required the implementation of the Final Remedy selected in the Final Decision and Response to Comments dated September 14, 2006 (FDRTC). For soils, the Final Remedy for the Facility consists of no further action because EPA had determined that there was no threat of exposure from direct contact with Facility soils. For Facility-related groundwater, the Final Remedy consists of operating a groundwater recovery and treatment system for the Main Site and monitored natural attenuation (MNA) with institutional controls for Former Landfill Area. In April 2014 EPA approved the temporary shutdown of the groundwater recovery and treatment system to determine if groundwater had met the Groundwater Cleanup Standards selected in the FDRTC. Data collected during the shutdown demonstrates that Groundwater Cleanup Standards had been attained.

With the Second Permit Modification, EPA approved the removal of a 58-acre parcel of Facility property identified as the GF Columbia Parcel from the requirements of the Original Permit and the First Permit Modification. EPA has determined that no additional corrective measures are necessary on the GF Columbia Parcel because there is no further action necessary for Facility soils and there is no Facility-related groundwater contamination under the GF Columbia Parcel.

With the Draft Permit, EPA proposes that the Permittee shall implement a Facility-wide groundwater monitoring program in accordance with the Sampling and Reporting Plan, approved by EPA on February 13, 2017. In addition, the permittee shall abide by the institutional controls which include groundwater use restrictions prohibiting the development of onsite wells at the Facility for drinking water or other domestic uses. The prohibition shall remain in effect for as long as necessary to minimize potential exposure until Groundwater Cleanup Standards for the Facility are demonstrated to be achieved and maintained in the long-term. The Permittee shall also maintain assurances of financial responsibility, initially established under the Original Permit, for completing the Final Remedy under this Permit as required by Section 3004(u) of RCRA, 42 U.S.C. § 6924(u).

III. Public Comment

Before EPA issues a Final Permit for the Facility, the public may participate in the permit decision process by reviewing the Draft Permit and the documents contained in the Administrative Record (AR) supporting the permit. The AR is available for public review during normal business hours at:

U.S. EPA Region III
Office of Remediation (3LC20)
1650 Arch Street
Philadelphia, PA 19103-2029
Contact: Ms. Catherine McGoldrick
Phone: (215) 814-3399
Fax: (215) 814-3163
Email: mcgoldrick.catherine@epa.gov

Comments for this Draft Permit will be accepted for forty-five (45) days, from November 30, 2017 to January 14, 2018. Interested parties are encouraged to review the AR and comment on EPA's proposed remedy. You may submit comments by mail, fax, or e-mail to Ms. Catherine McGoldrick at the address listed above.

A public meeting will be held upon request. Requests for a public meeting should be made to Ms. McGoldrick at the address listed above. A meeting will not be scheduled unless one is requested.

If no comments are received during the public comment period, the Draft Permit will become final and will become effective upon signature. If EPA receives comments on the Draft Permit during the public comment period, EPA will make a final permit decision after it considers information submitted during the public comment period. The Final Permit will become effective thirty (30) days after the service of notice of EPA's final permit decision or after the review procedures under 40 C.F.R. § 124.19 are exhausted.