UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III

STATEMENT OF BASIS

PMC POLYMER PRODUCTS, INC.
STOCKERTOWN, PENNSYLVANIA
EPA ID # PAD 000798454

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 PMC Polymer Product, Inc. facility located at 100 Station Avenue, Stockertown, Northampton County, Pennsylvania 18083 (Facility). EPA's review of available information indicates 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.

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 5, Public Participation, for information on how you may review the AR.

Section 2: Facility Background

According to the Northampton County property records website, the property was developed in 1937. Structures present at that time included two sets of railroad tracks, a commercial detached masonry garage, a commercial carport, two steel pressure tanks with a paved parking lot and a chain link fence. The Site activities and ownership prior to 1937 is unknown.

Prior to 1974, the Facility was owned by Chemtron, a manufacturer of plastic products, which was headquartered in Chicago, Illinois. Not much is known about Chemtron except that site activities included utilization of a nitro building.

The Site was purchased by PPG Industries, Inc. in 1974 and was used for the production of fire-retardant concentrates and compounds, which were pelletized for resale. The flame-retardant pellets were mainly used for cabinetry needs. This Facility also pelletized a non-dust form of pure antimony concentrate for resale. From 1974 to 1984, colorant was used in the production process. Prior to 1984, the Facility

was involved in transferring liquid phosgene from 1-ton cylinders to 150-pound cylinders for distribution. Phosgene remaining in the vapor space of the cylinders was vented to an ammonia scrubber, where it was neutralized, creating a build-up of ammonium chloride. Blowdown was directed to an on-Site cooling pond. The cooling pond was also used for recirculation of cooling water generated by the Facility. The start-up date for the pond is unknown. The closing date was December 1984.

Located north of the production building is an enclosed area that contains the former main dust collector (currently not operating), small propane tanks used for the Facility's forklifts, a trash compactor, and empty raw material drums. South of the production building is the wastewater collection system, which consists of a 12,500-gallon collection tank and a cooling tower, and three silos used to store raw pelletized material used during the production process. South of the maintenance building is a concrete pad that is the only remaining part of the former phosgene treatment building, where previously liquid phosgene was transferred from 1-ton cylinders into 150-pound cylinders for distribution. This building was later used for storage following the termination of the phosgene treatment process. A former cooling pond was located south of the former phosgene treatment building in a grass field. The pond has been filled and seeded.

In September 1994, the Polymer Products company, a branch of the PMC Group, headquartered in Mount Laurel, New Jersey, obtained the Site from PPG Industries.

The Polymer Products Facility currently specializes in the design, development, and production of plastic additive masterbatches and flame-retardant compounds. An additive masterbatch is a concentrate containing active ingredients that produce specific performance benefits in either the manufacturing process or the end product. Products produced at the Facility include flame retardant masterbatches, stabilizer masterbatches, static dissipative masterbatches, ignition resistant styrenics, flame retardant polyolefins, and specialty masterbatches and compounds. These products are utilized in a broad range of applications.

Section 3: Summary of Environmental History

EPA was provided with a copy of the Polymer Products Phase II (dated January 19, 2001) by the facility on September 25, 2018. The sampling results of this Phase II were used in conjunction with the Polymer Products Environmental Indicator Inspection Report from October 2009, and the Polymer Product Phase I Report dated March 30, 2011, to make this groundwater Environmental Indicator determination.

PADEP conducted an inspection at the Facility in September 1983 and reported the presence of a cooling pond on the southeastern portion of the property. PADEP was concerned that the industrial wastes contained in the pond was exfiltrating to groundwater from the bottom in violation of the Pennsylvania Clean Streams Laws. The Facility was advised either to get a permit for the pond or eliminate use of the pond. The Facility ultimately closed the cooling pond and replaced it with a cooling

tower and water tank. The pond reportedly was drained in November 1984, and soil samples were collected. Analytical results for the pond water or soil samples were not located in PADEP or USEPA files.

Based on local topography and the three temporary groundwater monitoring points installed by (Earth Sciences Consultants Incorporated) ESCI in January 2001, the groundwater flow direction beneath the Facility appears to be southeast toward Little Bushkill Creek.

During the 2001 Phase II sampling event a total of 12 soil samples were collected and analyzed from various areas of potential concern at the Polymer Products site. The overall objective of the Phase II ESA was to provide a general screening of the soil and groundwater quality at the site. For soils, areas of the facility were selected for sampling and analysis that represented the greatest likelihood of having a release. These areas included the area with two former heating oil underground storage tanks (UST), the area with one former diesel fuel UST, the lab vault sump, the former phosgene production building, and several storm water discharge areas. Additionally, one upgradient and two downgradient groundwater samples were scheduled to be collected and analyzed to determine potential off-site and on-site impacts to groundwater (TW-1, TW-2, and TW-3). During drilling groundwater was encountered in the soil overburden in only two of the three groundwater sampling locations. For full sampling data package results from the December 2000 sampling event see the January 2001 Phase II done for the facility by Earth Sciences Consultants, Inc.

Summary of Soil Results

Each of the 12 soil samples (4 surface and 8 subsurface) were analyzed for VOC's, SVOCs, antimony, and zinc.

Zinc was detected in each of the soil samples at concentrations ranging from 22 milligrams per kilogram (mg/kg) to 170 mg/kg. Zinc concentrations detected at the site appear to be within the expected range for natural soils. Zinc concentrations for all soil samples are below Pennsylvania residential statewide health standard of 66,000 mg/kg for direct-contact soils and 12,000 mg/kg for soils according to the soil to groundwater pathway.

Antimony was detected in 11 of the 12 soil samples at concentrations ranging from 0.72 mg/kg to 12 mg/kg. Antimony concentrations for all soil samples are below Pennsylvania residential statewide health standard of 88 mg/kg for direct contact-soils and 27 mg/kg for soils according to the soil to groundwater pathway.

VOCs and SVOCs were not detected in any of the soil samples collected from the former heating oil UST area. Methylene Chloride (a common laboratory artifact and possible source of contamination) was detected at the diesel fuel UST area, and soil samples at locations B-1, B-2, B-3, B-4, B-5, TW-1, and TW-2; all sampling results were below Pennsylvania statewide human health standard of 3 mg/kg.

At location B-1, two SVOCs were detected, Di-n-butyl phthalate and Di-n-octyl phthalate were detected at concentrations below the corresponding Pennsylvania statewide human health standards.

At soil sample locations B-4 and B-5 Acetone, bis (2-ethylhexel) phthalate, and carbon disulfide were detected in soil samples. None of these compounds were detected at concentrations that exceed their corresponding Pennsylvania statewide human health standards.

Summary of Groundwater Results

Groundwater samples were analyzed for VOC's, SVOCs, and total concentrations of antimony and zinc. Groundwater samples indicated the presence of 2-butanone (MEK) at 21 ug/l at temporary groundwater monitoring location TW-1, below the PADEP Residential Groundwater MSC. In addition, zinc was identified in groundwater samples collected at TW-1 (86 ug/L) and TW-2 (73 ug/L), below the PADEP Residential Groundwater MSC. No other constituents of concern, were detected in the groundwater samples collected from these two temporary monitoring points. During drilling at the site, groundwater was not encountered above bedrock at the proposed TW-3 location, so groundwater sampling and analysis was not performed at this well location. This is the latest groundwater analytical data for the Site.

Wastewater generated onsite is held in a polypropylene AST, which is pumped twice a month by a contractor and transported to the Stockertown Municipal Wastewater Treatment Facility. The Facility does not hold a National Pollutant Discharge Elimination System (NPDES) permit.

Based on the latest facility Phase II data, EPA does not believe there are any completed pathways or concerns for contaminated groundwater exposures at the Polymer Products Facility at this time.

There are no institutional or engineering controls at this time, at this facility.

Section 4: Environmental Indicators

EPA sets national goals to measure progress toward meeting the nation's major environmental goals. For Corrective Action, EPA evaluates two key environmental indicators for each facility: (1) current human exposures under control and (2) migration of contaminated groundwater under control. The EPA has determined that the Facility met the migration of contaminated groundwater under control indicator on November 20, 2018. The EPA has determined that the Facility met the current human exposures under control indicator on September 12, 2018.

Section 5: 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 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: Grant Dufficy
Phone: (215) 814-3455
Fax: (215) 814-3113
Email: dufficy.grant@epa.gov

Interested parties are encouraged to review the AR and comment on EPA's proposed decision. The public comment period will last thirty (30) 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. Grant Dufficy. EPA will hold a public meeting to discuss this proposed decision upon request. Requests for a public meeting should be made to Mr. Grant Dufficy.

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. Grant Dufficy at the address listed above.

Date: 11.30.18

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

Phase II Environmental Site Assessment, prepared by Earth Sciences Consultants, January 19, 2001

Phase I Environmental Site Assessment EPA All Appropriate Inquiry, PMC Polymer Products, prepared by Federated Environmental Associates, Inc. March 30, 2001

Environmental Indicator Inspection Report, Prepared for Pennsylvania Department of Environmental protection by URS, October 2009, under Contract No. 68-01-7346 in accordance with Technical Directive Document No. F3-9002-15