UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III

STATEMENT OF BASIS

FLINT GROUP PIGMENTS
(FORMERLY: BASF, XSYS PRINT SOLUTIONS U.S.)
Parcels 43 and 45

HUNTINGTON, WV

EPA ID No. WVD000068601

Prepared by
Office of Remediation
Land and Chemicals Division

October 2019

Contents

Figures

List of Commonly Used Acronyms

AOC	Area of Concern
AR	Administrative Record
COC	Constituent of Concern
EPA	Environmental Protection Agency
FDRTC	Final Decision and Response to Comments
HSWA	Hazardous and Solid Waste Amendments
MCL	Maximum Contaminant Level
PAH	Polycyclic Aromatic Hydrocarbons
RCRA	Resource Conservation and Recovery Act
RSL	Regional Screening Level
SB	Statement of Basis
SVOC	Semi-Volatile Organic Compound
SWDA	Solid Waste Disposal Act
VOC	Volatile Organic Compound

Section 1: Introduction

The U.S. Environmental Protection Agency (EPA) has prepared this Statement of Basis (SB) under the Corrective Action Program to solicit public comment on its proposed remedy for portions of the Flint Group Pigments Facility located at 5th Avenue & 24th Street in Huntington, WV 25703 (the Facility). The proposed remedy pertains to Tax Parcels 43 and 45 (collectively, the Parcels) at the Facility. EPA's proposed remedy for Parcels 43 and 45 is soil excavation, consolidation and capping or offsite removal, and institutional controls limiting the land and groundwater use and managing indoor vapor intrusion exposure. The purpose of this SB is to solicit public comment on the proposed remedy for the subject Parcels (i.e. totaling approximately 7.8 acres), as part of the redevelopment and economic revitalization of the local area.

The proposed remedy described in this SB addresses the contaminated soils at the Parcels. Groundwater conditions at the Parcels are included for informational purposes, and to support the proposed groundwater use limitations that are necessary to protect human health until Facility-wide groundwater is addressed. EPA will be issuing a separate SB addressing the rest of the Facility soils and Facility-wide groundwater at a later date.

The Facility is subject to EPA's Corrective Action Program under the Solid Waste Disposal Act (SWDA), 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 owners/operators of facilities subject to RCRA have investigated and cleaned up any releases of hazardous waste and hazardous constituents that have occurred at their property.

EPA is providing a thirty (30) day public comment period on this SB. EPA may modify its proposed remedy based on comments received during this period. EPA will announce its selection of a final remedy for the Parcels in a Final Decision and Response to Comments (Final Decision) after the public comment period has ended.

EPA will make a decision after considering all comments received during the comment period, consistent with applicable RCRA requirements and regulations. If the remedy is substantially unchanged from the one proposed, EPA will issue a final decision and inform all persons who submitted written comments or requested notice of EPA's final determination. If the final remedy is significantly different from the one proposed, EPA will issue a public notice explaining the new remedy and will reopen the comment period. In the Response to Comments section attached to the Final Decision, EPA will respond in writing to each comment received.

Information on the Corrective Action program as well as a fact sheet for the Facility can be found by navigating to: https://www.epa.gov/hwcorrectiveactionsites/hazardous-waste-cleanup-flint-group-pigments-formerlybasf-xsys-print.

Section 2: Facility Background

2.1 Facility Description and History

The Facility is located at 5th Avenue & 24th Street in Huntington, WV 25703. The Facility is bordered to the north, west and east by residential and business properties, and to the south by railroad tracks. The Facility covers approximately 20 acres. A Facility Location Map and aerial photographs depicting the location and boundaries of the Facility are attached to this SB as **Figure 1.** The Parcels 43 and 45 encompass the areas depicted as AOCs 4, 8, 10 and 11.

The Facility was exclusively dedicated to making alkali blue, a pigment used in magazine and book printing before closing. The Facility had been an active dyestuffs and pigment manufacturing facility since 1912 and several companies owned and operated the Facility until 1979, when it was acquired by a BASF division. In 2004, the Facility operated under the ownership of Flint Group Pigments (owned by XSYS Printing Systems) after Flint Group Pigments was formed by the merger of BASF Printing Systems and ANI Printing Inks following their respective acquisitions at the end of 2004 by CVC Capital Partners (a private equity firm).

Under BASF ownership the Facility production focused on alkali blue pigment, and the other product lines (methyl violet, phthalocyanine blue and green pigments, azo pigments, iron oxide red, yellow pigments, ferrous sulfate, and red lake C) were discontinued. Under the operation of Flint Group Pigments, alkali blue remained the primary pigment manufactured at the Facility.

BASF operated a hazardous waste drum storage area, under RCRA interim status, at the Facility from 1981 to 1987. No treatment or disposal was conducted at the Facility. On January 21, 1987 BASF decided to close the hazardous waste storage area and submitted the Closure Notice to the EPA. The Final Closure for the hazardous waste storage area was approved by the EPA on April 14, 1988. The Facility was listed as a hazardous waste generator (EPA ID WVD000068601) and stored hazardous waste at the Facility for less than 90 days. BASF entered the Facility-Lead Corrective Action Program in 1999, in response to the EPA identification of the Facility as one of EPA Region III's "high priority" RCRA Corrective Action facilities to satisfy the Huntington Facility RCRA Corrective action obligations.

In 2018 the Huntington Municipal Development Authority (HMDA) acquired the Parcels to provide Marshall University with a baseball field and parking lot.

Parcel 43 - AOC 8 Former Coal Storage Area & AOC 11 Shipping and Warehouse Area

AOC 8 comprises two former coal storage areas located adjacent to the former pot kiln building and the boiler/pump room. Both storage areas were located next to railroad tracks, supporting a conclusion that coal may have been delivered to the storage areas by rail cars. The storage areas were part of the original Facility and were removed in 1985 by BASF. The former pot kiln building and boiler/pump room were demolished. AOC 11 was a shipping and warehouse area.

Parcel 45 - AOC 4 Former Gasoline Station & AOC 10 North Parking Lot

AOC 4 was a gasoline station which was in operation prior to 1931. The station consisted of a one-story building and three gasoline tanks which were presumably located underground. From 1965 through 1968, the gas station operated as an auto sales operation. As seen in an aerial photograph, by 1974 the one-story building was no longer present and there was no evidence of any tanks. From 1974 to 1983 Parcel 45 was used as a parking lot. Since 1988, Parcel 45 has been vegetated with grass. Available records do not indicate industrial activity at AOC 10 that may have resulted in known or suspected releases.

2.2 Environmental Setting

The Facility is located within the Allegheny Plateau physiographic province, approximately 3,500 feet south of the Ohio River and 6,000 feet west of the Guyandotte River. The geology of this vicinity of West Virginia generally consists of interrelated deltaic and coastal plain deposits approximately 60 feet thick, which overlie bedrock of the Conemaugh Group.

The bedrock of the Conemaugh Group consists of interrelated deltaic and coastal plain deposits. Sandstone, siltstone and shale are the primary lithologies with associated coals and marine limestones present in the sequence. The Conemaugh varies in thickness across West Virginia but ranges between 500 and 600 feet on average.

Unconsolidated sediments consisting of clay, silt, sand and gravel immediately underlie the Facility. The first stratigraphic unit, beginning at the ground surface, consists of dense fine grained silty clay approximately 5 to 10 feet in thickness. This unit is typically underlain by a dense plastic clay approximately 10 feet in thickness. This deposit is underlain by a layer of very dense sand with clay and silt, and a small amount

of gravel that is also approximately 10 feet in thickness. A sand and gravel deposit, approximately 10 feet thick, underlies the silty sand and extends to bedrock, which is present at a depth of approximately 55 to 60 feet below ground surface (bgs). Running sands were encountered at a depth of approximately 30 feet bgs during the installation of monitoring wells.

Groundwater at the Facility occurs in the unconsolidated alluvial sediments at depths of approximately 25 to 35 below ground surface (bgs), under unconfined (water table) conditions. The potentiometric groundwater elevation at the Facility is approximately 523 feet above mean sea level. The groundwater flow direction is generally to the north and north-northeast toward the Ohio River.

The Facility does not have surface water features within its boundaries. The nearest surface water bodies to the Facility are the Ohio and Guyandotte Rivers. The Facility is approximately 0.7 miles south of the Ohio River and 1.1 miles west of the Guyandotte River. Potable water for the area is supplied by the City of Huntington, which uses the Ohio River as its source.

Section 3: Environmental Investigations

Remedial Facility Investigation (RFI)

In 2000, BASF prepared the RCRA Initial Remedial Facility Investigation (IRFI) Workplan. Results of the IRFI were reported to the EPA in an IRFI Report (The ELM Group, August 13, 2003).

Parcel 43 - AOC 8 Former Coal Storage Area & AOC 11 Shipping and Warehouse Area

Two soil borings (AOC8-01 and AOC8-02) were installed in the area of the former coal storage areas to characterize the former coal storage area on the northern portion of Parcel 43. The two soil borings were each drilled to 4 feet below ground surface adjacent to the former coal storage area. At each soil boring location two soil samples were collected. The first sample was collected from the first six-inch interval of native soil. The second (deeper) soil sample was collected from a six-inch interval where coal fragments were observed. The four soil samples were analyzed for TCL, PAHs and TAL metals. Soil concentrations were screened against EPA RSLs for industrial soil and West Virginia Department of Environmental Protection Risk Based criteria.

PAH compounds were not detected in any of the four soil samples. Except for arsenic found at background levels, metals were either not detected or were detected at

concentrations below the applicable EPA RSLs in the four soil samples. All detected metal concentrations, including arsenic, were detected below the WVDEP de minimis values for industrial soil.

Parcel 45 - AOC 4 Former Gasoline Station & AOC 10 North Parking Lot

In July 2002, BASF completed a non-invasive geophysical survey to determine if underground storage tanks (USTs) were present on Parcel 45. The geophysical investigation was completed by performing an electromagnetic (EM) induction survey, and a ground penetrating radar (GPR) survey was completed on selected areas based on the results of the EM survey. The geophysical survey did not detect any USTs at the former gasoline station area. Since no evidence of underground storage tanks was documented, no further investigation of the AOC was conducted.

RFI Data Gap Investigation Report 2016 Parcel 43 AOC 11 – Shipping and Warehouse Area

In 2016, BASF conducted a RFI Data Gap Investigation at AOC 11 to delineate the groundwater exceedances that have historically been present at groundwater monitoring well TMW-9D. TMW-9D is located in the northwest corner of AOC 11. The EPA-approved scope of work for AOC 11 involved collecting four groundwater grab samples in this area to delineate groundwater upgradient and cross-gradient of TMW-9D and collect soil samples from well borings. Contaminants of concern (COCs) were not detected above their for the soil samples. The COCs included benzene, ethylbenzene, hexachlorobenzene, 1,1,2,2-tetrachloroethane (1,1,2,2-PCA), toluene, trichloroethene (TCE), tetrachloroethene (PCE), xylene, aniline, napthalene, nitrosodiphenylamine and PCBs. Given these findings, EPA had determined that no further investigation of Parcel 45 soils is necessary.

Parcel 45 Groundwater Conditions 2017

BASF conducted a Groundwater Conditions Investigation in 2017 (2017 GW Investigation) at existing and newly installed monitoring wells on Parcel 45. Groundwater samples were collected from 15 of the Membrane Interface Probe (MIP) boring locations as well as 15 supplemental groundwater grab sample locations. In total, ninety-six groundwater samples were collected for laboratory analysis of Facility-specific COCs including volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), polychlorinated biphenyls (PCBs), and metals.

Consistent with previous sampling events, groundwater concentrations of chlorinated VOCs (CVOCs), primarily tetrachloroethene (PCE) and trichloroethene (TCE), were detected at concentrations above their respective Maximum Contaminant Levels (MCLs) in monitoring wells located on- and off-site during the 2017 GW Investigation. The highest concentrations for tetrachloroethene (PCE) was 440 ug/l

(MCL of 5 ug/l) and trichloroethene (TCE) was 230 ug/l (MCL of 5 ug/l). The CVOC plume originates on the Facility and extends north in the direction of groundwater flow, under the neighboring residential properties. The plume underlies Parcel 45 and borders Parcel 43 along 24th Street. See Figures 2-4.

There are no known receptors for groundwater contamination at Parcels 43 and 45. Potable water in the vicinity of the Facility is supplied from the Ohio River through the City of Huntington and there are no surface water features within the Facility. Furthermore, the pervasive clay unit identified from approximately eight to 20 feet thick bgs reduces the potential for vapor from the groundwater plume to migrate through the vadose zone into overlying buildings.

Vapor Intrusion (VI) Investigation at Parcel 45

As part of the 2016 RFI Data Gap Investigation BASF conducted soil gas sampling along the northern and eastern portions of Parcel 45. EPA Vapor Intrusion Screening Level (VISL) exceedances for soil gas were found in the North Parking Lot (Parcel 45). Vapor samples were taken just above the groundwater surface in installed monitoring wells. Analytical results showed that 25 VOCs were detected in the 11 soil gas samples. Constituents detected in soil gas samples include: ethanol, acetone, carbon disulfide, carbon tetrachloride, hexane, cyclohexane, benzene, heptane, trichloroethene, toluene, tetrachloroethene, ethylbenzene, m, p-xylene, oxylene, 4-ethyltoluene, 1,3,5-trimethylbenzene, 1,2,4-trimethylbenzene, 4-methyl-2-pentanone, 2-butanone, 1,2-dichloroethane, styrene, propylbenzene, 2-propanol, 2,2,4-trimethylpentane, and chloroform.

Of the detections above, only three (3) constituents were detected at concentrations above their respective Vapor Intrusion Screening Levels:

• Carbon tetrachloride (TMW-29V, TMW-30V, and TMW-31V, with concentrations ranging from 9.1 to 100 ug/m^3 with a RSL of .47 ug/m^3);

• Tetrachloroethene (TMW-26V, TMW-27V, TMW-29V, and TMW-30V, with concentrations ranging from 210 to 4200 ug/m^3 with a RSL of 11 ug/m^3); and

• Trichloroethene (TMW-26V, TMW-27V, TMW-30V and TMW-31V, with concentrations ranging from 12 to 54 ug/m^3 with a RSL of .48 ug/m^3).

Residential screening values were used for screening the detections in Parcel 45 as residential properties are located along the eastern boundary of the North Parking Lot.

Based on the groundwater well borings and residential indoor air vapor sampling, the presence of a natural clay barrier that underlies the Facility EPA has determined that there is no current potential for unacceptable risk from vapor intrusion.

Soil sampling in 2018

In December 2018, HMDA had a qualitative environmental site assessment performed at the Parcels. Soil samples were collected up to three feet deep. Ninety-eight soil samples were collected.

Analytical Results and Screening Summary Parcel 43 Surface Soil

Two analytes, arsenic and a PCB aroclor (Aroclor 1242), were detected exceeding their respective Industrial RSLs. However, arsenic was not detected exceeding its maximum natural background for West Virginia. No other analytes were detected in Parcel 43 surface soil exceeding their respective screening levels.

Parcel 43 Subsurface Soil

Arsenic was detected exceeding its Industrial RSLs but was not detected exceeding its maximum natural background for West Virginia. No other analytes were detected in Parcel 43 subsurface soil exceeding their respective screening levels.

Parcel 45 Surface Soil

Two analytes, benzo(a)pyrene and Aroclor 1242 (1.34 mg/kg), were detected exceeding their Residential RSL. Arsenic was detected exceeding its Industrial RSL but was not detected exceeding its maximum natural background for West Virginia. No other analytes were detected in Parcel 45 surface soil exceeding their respective screening levels.

Discussion of Analytes Exceeding Screening Concentrations

Three analytes, benzo (a) pyrene, arsenic, and Aroclor 1242, were detected in the Parcels soil exceeding their respective screening levels. Benzo(a) pyrene was detected in one sample exceeding its Residential RSL. Based on the concentration of the detection and its occurrence exceeding the standard in only one of the samples, EPA does not anticipate benzo(a)pyrene to be a COC.

Arsenic was detected in numerous samples exceeding its Industrial RSL but was not detected exceeding its maximum natural background for West Virginia.

On Parcel 45, Aroclor 1242 was detected in surface soil exceeding the TSCA PCB clean up level of 1 ppm. On Parcel 43, Aroclor 1242 was found in 31 of 53 surface samples at concentrations above 1 mg/kg. The highest concentration was 198 ppm.

PCB soil sampling performed during September 2019 further delineated and confirmed the locations of the PCB soil contamination.

Section 4: Corrective Action Objectives

4.1 Soil

EPA's Corrective Action Objectives (CAOs) for soils at Parcels 43 and 45 is to prevent any exposure to VOCs and SVOCs above EPA Industrial Soil RSLs, and PCB above 1 ppm for direct contact and 10 ppm for capped soil.

4.2 Groundwater

While this Statement of Basis does not include a proposed remedy for contaminated groundwater, EPA is including a proposed corrective action objective for contaminated groundwater as Institutional Controls.

EPA expects final remedies to return usable groundwater to its maximum beneficial use within a timeframe that is reasonable given the circumstances of the project. For projects where aquifers are either currently used for water supply or have the potential to be used for water supply, EPA will use drinking water standards, otherwise known as MCLs, as the cleanup standard. Therefore, EPA's CAO for groundwater at Parcels 43 and 45 is to achieve MCLs and control exposure to the hazardous constituents remaining in the groundwater until applicable MCLs are achieved throughout the area of contaminated groundwater and demonstrated by groundwater monitoring results. Figures 2, 3 and 4 show the extent of groundwater contamination at the Parcels.

Section 5: Proposed Remedy

5.1 Soils

EPA's proposed remedy for the soils at Parcels 43 and 45 which are contaminated with PCBs consists of soil excavation and offsite disposal; soil consolidation and capping and compliance and maintenance of land use restrictions (see Section 5.3 below). For Soil Disposal, Consolidation and Capping, a PCB Soil Remediation Plan shall be developed and submitted to EPA for review and approval in accordance with 40 CFR section 761.61(a) when EPA issues a Final Remedy Decision.

5.2 Groundwater

Hazardous constituents remain in the groundwater under the Parcels at levels above their applicable MCLs. While EPA will be issuing a separate SB to address Facility-wide groundwater at a later date, EPA is proposing in this SB to require groundwater use restrictions (see Section 5.3 below) at the Parcels to control exposure to those constituents while they remain in the groundwater.

5.3 Land and Groundwater Use Restrictions

EPA is proposing the following land and groundwater use restrictions be implemented at the Parcels:

a. Prior to any earth moving activities, including excavation, drilling and construction activities, if there are any newly discovered areas at the Parcels where any contaminants remain in soils above EPA's screening levels for residential use or groundwater above federal Maximum Contaminant Levels (MCLs) promulgated pursuant to Section 42 U.S.C. §§ 300f et seq. of the Safe Drinking Water Act and codified at 40 CFR Part 141, any and all such earth moving activities shall be conducted in accordance with an EPA approved a Soils Management Plan which shall be developed and submitted to EPA for review and approval. The Soils Management Plan will detail how soils will be managed and disposed during any future subsurface activities conducted at the Facility. All soils that are to be disposed of shall be sampled and disposed of in accordance with applicable State and Federal regulations. The Materials Management Plan will include analysis of Facility COCs.

b. The Parcels shall be restricted to commercial and/or industrial purposes and shall not be used for residential purposes unless the then current landowner demonstrates to EPA that such use will not pose a threat to human health or the environment or adversely affect or interfere with the selected remedy and the then current property owner obtains prior written approval from EPA for such use.

c. An EPA approved vapor intrusion control system shall be installed in each newly occupied structure constructed within 100 feet of the contaminated groundwater plume and operated unless or until it is demonstrated to EPA that vapor intrusion of contaminants does not pose a threat to human health and EPA provides prior written approval that no vapor intrusion control system is needed.

d. Groundwater at the Parcels shall not be used for any purpose other than the operation, maintenance, and monitoring activities required by EPA, unless it is demonstrated to EPA that such use will not pose a threat to human health or the environment or adversely affect or interfere with the Final Remedy and the then current property owner obtains prior written approval from EPA for such

use.

e. No new wells shall be installed on the Parcels unless the then current property owner demonstrates to EPA that such wells are necessary to implement the Final Remedy and the then current property owner obtains prior written approval from EPA to install such wells.

5.4 Other Requirements

a. On an annual basis and whenever requested by EPA, the then current Parcel owner shall submit to EPA and WVDEP a written certification stating whether the groundwater and land use restrictions required by the Final Remedy are in place and being complied with;

b. The then current Parcel owner shall allow the EPA, WVDEP, and/or their authorized agents and representatives, access to the Parcel property to inspect and evaluate the continued effectiveness of the Final Remedy and, if necessary, to conduct additional remediation to ensure the protection of the public health and safety and the environment; and

c. The then current Parcel owner shall provide EPA with a coordinate survey, as well as a metes and bounds survey, of the Parcels boundary. Mapping the extent of the land use restrictions will allow for presentation in a publicly accessible mapping program such as Google Earth or Google Maps.

Section 6: Evaluation of Proposed Remedy

This section provides a description of the criteria EPA used to evaluate the proposed remedy consistent with EPA guidance. The criteria are applied in two phases. In the first phase, EPA evaluates three decision threshold criteria as general goals. In the second phase, for those remedies which meet the threshold criteria, EPA then evaluates seven balancing criteria.

Threshold Criteria	Evaluation
1) Protect human health and the environment	EPA's proposed remedy for the Parcels protects human health and the environment by eliminating, reducing, or controlling potential unacceptable risk through the removal or capping of contaminated soil; and implementation and maintenance of use restrictions. EPA is proposing to restrict land use to commercial or industrial purposes at the Parcels. With respect to groundwater, EPA will be issuing a separate SB to address Facility-wide groundwater at a later date. The Facility and surrounding area are currently being provided with potable water from the City's public water supply system. With respect to future uses at the Parcels, the proposed remedy requires groundwater use restrictions to minimize the potential for human exposure to hazardous constituents while they remain in the groundwater. Any future building construction, that is to be occupied at the Parcels shall include a vapor intrusion control system in order to prevent potential unacceptable exposure to VOCs.
2) Achieve media cleanup objectives	EPA's proposed remedy meets the media cleanup objectives based on assumptions regarding current and reasonably anticipated future land and water resource use(s). The remedy proposed in this SB is based on the current and future anticipated land use at the Parcels for commercial or industrial purposes. With the exception of PCB, all COCs already meet the soil cleanup objective. The PCB contaminated soil will either be removed or consolidated on site and capped. EPA's proposed remedy also requires the implementation and maintenance of land and groundwater use restrictions.

3) Remediating the Source of Releases	In all proposed remedies, EPA seeks to eliminate or reduce further releases of hazardous wastes and hazardous constituents that may pose a threat to human health and the environment. Since there are no sources of releases at the parcels, EPA has determined that this criterion has been met.

Section 6: Evaluation of Proposed Remedy (continued)

Balancing Criteria	Evaluation
4) Long-term effectiveness	The PCB contaminated soil will either be removed or consolidated and capped onsite effectively eliminating the potential for unacceptable risk over the long term.
5) Reduction of toxicity, mobility, or volume of the Hazardous Constituents	The PCB contaminated soil will either be removed or consolidated and capped onsite. The main source of groundwater contamination is at the Flint Manufacturing facility and will be addressed in a separate SB for that area in the future.
6) Short-term effectiveness	EPA anticipates that the use restrictions will be fully implemented shortly after the issuance of the Final Decision and Response to Comments. EPA's proposed remedy takes into consideration future activities, such as construction or excavation that would pose short-term risks to workers, and the environment by requiring the then current owners to implement and adhere to land and groundwater use restrictions.
7) Implementability	EPA's proposed remedy is readily implementable. EPA proposes to implement the use restrictions through an enforceable mechanism such as an Environmental Covenant, permit or order.
8) Cost	EPA's proposed remedy is cost effective. The costs for soil removal and capping are projected to be $410,000.
9) Community Acceptance	EPA will evaluate community acceptance of the proposed remedy during the public comment period, and it will be described in the Final Decision and Response to Comments.
10) State/Support Agency Acceptance	WVDEP has reviewed and concurred with the proposed remedy for the Parcels.

Section 7: Financial Assurance

Anticipated cost of the remedy is approximately $410,000. The remedy is going to be implemented and completed in a year so no Financial Assurance is required.

Section 8: Public Participation

Before EPA makes a final decision on its proposed remedy for the Parcels, the public may participate in the decision selection process by reviewing this SB and documents contained in the Administrative Record (AR) for the Parcels. The Index to the AR may be found in Section 9 of this SB. The AR contains all information considered by EPA in reaching this proposed remedy. It is available for public review during normal business hours at:

U.S. EPA Region III
1650 Arch Street
Philadelphia, PA 19103
Contact: Leonard Hotham
Phone: (215) 814-5778
Fax: (215) 814-3113
Email: hotham.leonard@epa.gov

Interested parties are encouraged to review the AR and comment on EPA's proposed remedy. 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. Leonard Hotham. EPA will hold a public meeting to discuss this proposed remedy upon request. Requests for a public meeting should be made to Mr. Leonard Hotham.

EPA will respond to all relevant comments received during the comment period. If EPA determines that new information warrants a modification to the proposed remedy, EPA will modify the proposed remedy or select other alternatives based on such new information and/or public comments. EPA will announce its final remedy 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 remedy will receive a copy of the FDRTC. Others may obtain a copy by contacting Leonard Hotham at the address listed above.

Date: 10/25/19

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

Section 9: Index to Administrative Record

1. Initial Phase RCRA Facility Investigation Report by the Environmental Liability Management Group, August 13, 2003
2. Supplemental Groundwater Investigation Results Report by the Environmental Liability Management Group, September 20, 2005
3. RCRA Facility Investigation Report Phase II by the Environmental Liability Management Group, May 14, 2010
4. RCRA Facility Investigation Data Gap Report by the Environmental Liability Management Group, December 2016.
5. Interim Status Report Subsurface and Vapor Intrusion Investigation by BASF, August 3, 2018

Figure 1

AREAS OF CONCERN

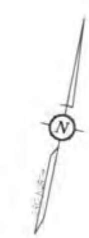
AOC 1 - 25TH STREET LANDFILL
AOC 2 - FORMER PROCESS SEWERS
AOC 3 - ON-SITE RAILROAD LINES
AOC 4 - FORMER GASOLINE STATION
AOC 5 - ON-SITE WASTEWATER TREATMENT SYSTEM
AOC 6 - ABOVE GROUND STORAGE TANKS
AOC 7 - ELECTRICAL TRANSFORMERS
AOC 8 - FORMER COAL STORAGE AREA
AOC 9 - GROUND WATER

BUILDING LEGEND

1 - WAREHOUSE
8 - WAREHOUSE
9A - SHIPPING
9B - WAREHOUSE
10 - PARKING LOT
11 - CONTRACTOR AREA
41 - ENGINEERING & MAINTENANCE
42 - STORAGE
46 - STOREROOM
47 - VACANT
48 - ADMINISTRATION
50 - SECURITY
51 - LAB, HUMAN RESOURCES, FLUSH COLOR
52 - COMPRESSOR ROOM
53 - FLUSH COLOR
54 - DYE & FLUSH COLOR
56 - DYE
57 - DYE & FLUSH COLOR
58 - DYE
59 - FLUSH COLOR
60 - ELECTRIC SUBSTATION
61 - DYE
63 - DYE
64 - PHENOL EXTRACTION
65 - PHENOL EXTRACTION
66 - STORAGE
66A - PHENOL EXTRACTION
68 - CONTROL BUILDING
69 - REFRIGERATION
70 - MIDPLANT DOCK
71 - BOILER HOUSE
72 - CARPENTER SHOP
73 - ELECTRIC SUBSTATION
74 - COOLING TOWER
75 - HAZARDOUS MATERIAL PAD
76 - WASTE TREATMENT
77 - WASTE TREATMENT
78 - HAZARDOUS MATERIAL PAD
79 - TIPL TRUCK GARAGE
80 - CAUSTIC FORMALDEHYDE TANK FARM
81 - ANILINE TANK FARM
82 - ACID TANK FARM
83 - ANILINE TANK FARM
84 - MIDPLANT TANK FARM
85 - SEPARATOR TANK FARM
86 - WEST END TANK FARM
87 - PHENOL EXTRACTION
88 - SULFURIC ACID TANK FARM
89 - RAILCAR UNLOADING PAD
90 - WEST TRUCK LOADING PAD
91 - EAST UNLOADING PAD
92 - COAL STORAGE AREA

LINETYPE AND SYMBOL LEGEND

	BASF PROPERTY BOUNDARIES (APPROXIMATE)
	OUTLINE OF AREA OF CONCERN (AOC)
	AREA OF CONCERN NAME TAG
	BUILDING FOUNDATION / STRUCTURE OUTLINE
	BUILDING / STRUCTURE NUMBER KEY
	PROCESS WASTE WATER / STORMWATER PIPING
	FENCE LINE
	RAILROAD TRACKS
	OFFSITE PROPERTY LINES
	STREET EDGE OF PAVEMENT



ELM SITE SOLUTIONS
ENVIRONMENT & DEVELOPMENT

REVISIONS

Figure 2- Site Map
Former BASF Facility
Huntington, West Virginia

DESIGNED | DRAWN | CHECKED
HORIZONTAL SCALE
DATE
PROJECT NO.

Figure 2
SHEET NO.