UNITED STATES

ENVIRONMENTAL PROTECTION AGENCY

REGION III

STATEMENT OF BASIS

HONEYWELL INTERNATIONAL, INC.
POTTSVILLE, PENNSYLVANIA

PAD069776185

I. Introduction

The United States Environmental Protection Agency (EPA) has prepared this Statement of Basis (SB) to solicit public comment on its proposed remedy for the Honeywell International, Inc. facility located at 98 Westwood Road, Pottsville, PA 17901 (Facility). EPA's proposed remedy consists of the implementation and maintenance of groundwater use restrictions. This SB highlights key information relied upon by EPA in developing its proposed remedy.

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

II. Facility Background

The Facility property consists of approximately 27 acres. Land use adjacent to the Honeywell property is residential to the north, commercial to the south, undeveloped wooded areas to the east, and Westwood Road to the west. A Facility location map and a Facility layout are attached to this SB as Figures 1 and 2, respectively.

Honeywell manufactures fluoropolymer film for the pharmaceutical industry and nylon film for the food industry. Operations started at the Facility in 1961, as Allied Chemical Corporation, following the purchase of the property in 1958. Operations have been continuous from then to present. On June 4, 1999, Allied Signal Inc. and Honeywell Inc. merged and on December 1, 1999, the Facility became Honeywell International, Inc.

The Facility is currently known as Honeywell Specialty Film Plant (Honeywell). Honeywell's current operation employs 210 workers and consists of two biaxial oriented nylon film extrusion lines, six fluoropolymer, one cast nylon/Aclar line, and two silos with a 200,000 pounds capacity each for nylon chip resin storage.

On October 9, 1980, the EPA assigned identification number PAD069776185 to the Facility. The Part A permit application was first filed on November 13, 1980 and revised on September 27, 1983. On September 30, 1985, the Part B permit was issued for the construction and operation of a hazardous waste storage facility. On April 28, 1986, the Facility submitted an application to amend the hazardous waste permit to add an additional storage area for hazardous waste. On June 23, 1987, PADEP authorized a

permit modification for the construction and operation of the additional hazardous waste storage unit. The Facility's hazardous waste storage areas were clean closed and certified on September 8, 1995.

In 2003, Honeywell responded to an acetone release under Pennsylvania Department of Environmental Protection (PADEP) authority. On January 6, 2006, PADEP approved the Remedial Investigation/Final Report for acetone that was remediated to the Act 2 Statewide Health Standards (SHSs) and Site Specific Standards (SSSs) at the Facility.

III. Summary of Environmental Investigations

The Facility had used acetone stored in an aboveground storage tank (AST) located southeast of Building 1 and west of Shed 1. Between November 10 and 15, 2003, approximately 764 gallons of acetone were released into the subsurface from the underground transfer line leading from the AST to the process building (Building 1). The release was caused by a 1/8 inch hole in a pipe.

In response, the Facility removed the AST contents. On November 17, 2003, the acetone pipeline from the corner of Building 1 to the location where it crossed the French drain (approximately 30 feet) was removed. The asphalt, subbase gravel and underlying soil to the north and west of the spill site were also removed.

In December 2003, the Facility began site characterization activities to assess the degree and extent of acetone impact to soil and groundwater. Soil and groundwater samples were collected as part of phased site characterization activities between December 2003 and April 2005.

The Act 2 SSS for acetone is 1,000 mg/kg for non-residential properties. EPA recognizes that this standard is protective of both human health and groundwater in non-residential scenarios. Thus, EPA agrees that the appropriate remedial goal was to address soil that exceeded the 1,000 mg/kg standard.

Excavation of the impacted soil was completed in stages. The excavation was concentrated in the area near the southeast corner of Building 1, where the acetone releases occurred, and extended along the former location of the acetone pipeline for approximately 35 feet. Soil was also excavated around and below the former location of the French drain pipe to the location of the manhole. The excavation area was backfilled with a combination of granular fill and general soil fill and repaved with approximately 6 inches of asphalt.

Impacted soil with acetone concentrations exceeding 1,000 mg/kg was removed throughout the Facility property with one exception – the area below the footer of Building 1. At this location, an acetone concentration of 19,000 mg/kg was reported. Additional soil was not removed from below the footer due to the concern that this would cause structural damage to the building.

Honeywell performed a risk evaluation that used a risk-based standard that requires action if the acetone in soil below the footer measures higher that 21, 291 mg/kg. Since the highest concentration found in the area was 19,000 mg/kg, no further action is necessary, given current and anticipated land use.

A total of 824,300 pounds of acetone contaminated soil was sent for off-site for disposal. Four roll-off boxes containing 118,860 lbs. of contaminated soil were shipped off-site for incineration.

Honeywell also investigated groundwater impact at the Facility. On March 8 and 9, 2004, four monitoring wells were installed at the Facility. Monitoring well MW-1 is an upgradient well, MW-2 is located next to the excavation area, and MW-3 and MW-4 are at the downgradient Facility boundary. In November 2004, two piezometers, PZ-1 and PZ-2, were installed in the vicinity of the former excavation. Groundwater flow direction is to the south/southwest. Groundwater samples were collected from each of the monitoring wells on March 10, 2004, September 8, 2004, December 5, 2004, and January 6, 2005. Groundwater samples were collected from each piezometer on December 5, 2004 and January 6, 2005. Groundwater samples were collected from MW-1 and PZ-1 and PZ-2 on February 25, 2005. On April 12, 2005, additional groundwater samples were collected from 9 test borings GP-1 through GP-6, GP-9, GP-10, and GP-PZ2, PZ-1, PZ-2 and MW-2.

For all environmental investigations, groundwater concentrations were screened against federal drinking water standards known as 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, or EPA Region III Risk-Based Concentration (RBCs) for tap water (designated as Screening Levels for tap water (SLs)) for chemicals for which there are no applicable MCLs. EPA has not promulgated an MCL for acetone, therefore EPA screening level of 14,000 ug/l was used to evaluate groundwater data.

Acetone was found in the source area at levels ranging from 5,400 parts per millions (ppm) to as high as 15,000 ppm. Within 50 feet of the source, acetone levels had decreased to 29 ppm. At the Facility boundary wells, MW-3 and MW-4, 200 feet away, acetone was not detected. Given the volume of soil removal, EPA expects groundwater concentrations of acetone will continue to decline due to natural attenuation. Acetone is highly volatile and easily degrade in the environment. In addition, Honeywell completed fate and transport modeling in accordance with the Act 2 Technical Guidance Manual. The results of the modeling confirm that the acetone levels in groundwater associated with the release location do not exceed the EPA RSL of 14,000 ug/l or the PADEP used-aquifer MSC of 10,000 ug/l at the downgradient Facility property boundary. EPA is, therefore, proposing groundwater use restrictions as the sole remedial measure for groundwater.

EPA evaluated the indoor air exposure pathway for acetone vapor that could migrate from groundwater to the surface. The acetone concentrations in groundwater underneath the Facility were found to be below EPA's target groundwater screening level

for vapor intrusion of 23,000,000 ug/l. Thus, the indoor air pathway does not currently require any action.

IV. Corrective Action Objectives

EPA's Corrective Action Objectives for the Facility are the following:

1. Soils

EPA's Corrective Action Objective for soils is to attain EPA's residential soil Screening Level of 61,000 mg/kg.

2. Groundwater

EPA's Corrective Action Objective for Facility groundwater is to meet EPA Screening Level for tap water which is 14,000 ug/l for acetone. Until such time as the Screening Level is met throughout the Facility, exposures will be controlled by requiring groundwater use restrictions at the Facility.

3. Subsurface Vapor Intrusion

EPA corrective action objective for indoor air at the Facility is the attainment of EPA's target groundwater Screening Level for vapor intrusion. EPA has determined that attainment of EPA's target groundwater screening level for vapor intrusion is protective of human health and the environment for individual contaminants at the Facility.

V. Proposed Remedy

1. Soils

EPA has made a Corrective Action Complete without Controls determination for Facility soils because based on the available information, there are currently no unacceptable risks to human health and the environment from Facility soils for the present and anticipated use of Facility property and therefore, EPA proposes that no land use restrictions are required at the Facility.

2. Groundwater

EPA's proposed remedy for groundwater at the Facility is monitored natural attenuation in concert with the implementation and maintenance of groundwater use restrictions for as long as acetone concentrations in the groundwater measure above 14,000 ug/l.

Under the groundwater restrictions to be put in place at the Facility, groundwater shall not be used for any purpose other than to conduct the operation, maintenance, and monitoring activities required by PADEP and/or 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 selected remedy and EPA provides prior written approval for such use.

3. Subsurface Vapor Intrusion

EPA has made a Corrective Action Complete without Controls determination for subsurface vapor intrusion at the Facility. The acetone concentrations in the Facility's groundwater measure below EPA's target groundwater screening level of 23,000,000 ug/l for vapor intrusion. (See Administrative Record, Table 1, for further information and comparison).

4. Implementation

EPA proposes to implement the groundwater restrictions through an enforceable environmental covenant that conforms to the format and requirements set out in the Pennsylvania Uniform Environmental Covenant Act, 27 Pa.C.S. §§ 6501-6517 (UECA). The completed and approved environmental covenant will be will be filed and recorded. The environmental covenant will bind Honeywell and all future owners of the Facility to the restrictions set out in it. The environmental covenant will be drafted and recorder by Honeywell.

VI. Evaluation of EPA's 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 to determine which proposed remedy alternative provides the best relative combination of attributes.

A. Threshold Criteria

1. Protect Human Health and the Environment

Based on the results of the October 18, 2005 Remedial Investigation/Final Report, EPA has determined that after Honeywell's excavation and disposal activities, the sources of groundwater contamination, have been greatly reduced. While contaminant remains in the groundwater beneath the facility, the contaminant is contained and does not migrate beyond the Facility's property. Since the contaminant remains in the groundwater at concentrations above the Act 2 non-residential used aquifer MSC for acetone and EPA RSL, EPA's proposed final remedy requires the implementation and maintenance of groundwater use restrictions to ensure that groundwater beneath the Facility is not used for any purpose.

2. Achieve Media Cleanup Objectives

The Facility has achieved the EPA's residential SLs for soils and subsurface vapor intrusion. The groundwater beneath the Facility plume appears to be stable (not migrating); although acetone concentrations are above MCLs, they are either stable or declining over time through attenuation. In addition, groundwater monitoring will continue until groundwater clean-up standards are met through attenuation. Until drinking water standards are met, the proposed remedy requires groundwater use restrictions to minimize the potential for human exposure to contamination and protect the integrity of the remedy.

3. Remediating the Source of Releases

In all proposed remedies, EPA seeks to eliminate or reduce further releases of hazardous wastes or hazardous constituents that may pose a threat to human health and the environment. As shown in the October 18, 2005 Remedial Investigation Report, the Facility met this objective by removing the AST and several hundred tons of contaminated soil. There are no remaining large, discrete sources of acetone which would be released to the environment. Therefore, EPA has determined that this criterion has been met.

B. Balancing/Evaluation Criteria

1. Long-Term Effectiveness

The proposed groundwater use restrictions will maintain protection of human health and the environment over time by controlling exposure to the hazardous constituents remaining in groundwater. EPA anticipates that the groundwater use restrictions may be implemented through an environmental covenant to be recorded with the deed for the Facility property and which will be enforceable against future owners.

2. Reduction of Toxicity, Mobility, or Volume of the Hazardous Constituents

The reduction of toxicity, mobility and volume of hazardous constituents at the Facility has already been by tank removal and soil excavation.

3. Short-Term Effectiveness

EPA's proposed remedy does not involve any activities, such as construction or excavation that would pose short-term risks workers, residents, and the environment. In addition, EPA anticipates that the groundwater use restrictions will be fully implemented shortly after the issuance of the Final Decision and Response to Comments (FDRTC).

4. Implementability

EPA's proposed remedy is readily implementable.

5. Cost

The major portion of remedial work has been completed. The cost of implementing the proposed remedy is estimated to be less than $1,000.00. EPA is not proposing financial assurance for this remedy.

6. Community Acceptance

EPA will evaluate Community acceptance of the proposed remedy during the public comment period and will be described in the FDRTC.

7. State/Support Agency Acceptance

PADEP has overseen cleanup activities to date. EPA is proposing that PADEP's actions to date are protective. EPA will evaluate the Commonwealth's acceptance based on comments received from PADEP during the public comment period and will be described in the FDRTC.

VII. 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 these indicators on March 14, 2012.

VIII. Financial Assurance

EPA has evaluated whether financial assurance for corrective action is necessary to implement EPA's proposed remedy at the Facility. Given that EPA's proposed remedy does not require any further engineering action to remediate soil, groundwater or indoor air contamination at this time and given that the costs of implementing groundwater use restrictions are estimated to be less than $1,000.00, EPA is proposing that no financial assurance be required.

IX. Public Participation

Before EPA makes a final decision on its proposal for the Facility, the public may participate in the remedy 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 remedy. It is available for public review during normal business hours at:

U.S. EPA Region III
1650 Arch Street
Philadelphia, PA 19103
Contact: Ms. Tran Tran
Phone: (215) 814-2079
Fax: (215) 814-3113
Email: tran.tran@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 Ms. Tran Tran. EPA will hold a public meeting to discuss this proposed remedy upon request. Requests for a public meeting should be made to Ms. Tran Tran.

EPA will respond to all relevant comments received during the comment period. If EPA determines that new information warrant 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 FDRTC. All persons who comment on this proposed remedy will receive a copy of the FDRTC. Others may obtain a copy by contacting Ms. Tran Tran at the address listed above.

Date: 8.27.14

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

Attachments:

1. Attachment 1 – Figure1 - Facility Location Map
2. Attachment 2 – Figure 2 – Site Layout
3. Attachment 3 – Index to Administrative Record

Attachment 1

Figure 1 – Facility Location Map

SOURCE:
google.com

LON= 76°14'16.15"W
LAT = 40°40'38.45"N

SCALE: Approx.1"=1000' DATE:JUNE 2009 S.O. NO.: 115410 FILE: 115410_HONEY_01 DSN/DWN:JPK/RRR CHK: JPK	Baker MICHAEL BAKER JR., INC. MOON TOWNSHIP, PENNSYLVANIA	FIGURE 1 FACILITY LOCATION MAP HONEYWELL INTERNATIONAL, INC. 98 WESTWOOD ROAD POTTSVILLE, PENNSYLVANIA

Attachment 2

Figure 2 – Facility Layout Map

SOURCE:
google.com

SCALE: Approx.1"=150' DATE:JUNE 2009 S.O. NO.: 115410 FILE: 115410_HONEY_02 DSN/DWN:JPK/RRR CHK: JPK	Baker MICHAEL BAKER JR., INC. MOON TOWNSHIP, PENNSYLVANIA	FIGURE 2 FACILITY LAYOUT MAP HONEYWELL INTERNATIONAL, INC. 98 WESTWOOD ROAD POTTSVILLE, PENNSYLVANIA

Attachment 3

Index to Administrative Record

INDEX TO ADMINISTRATIVE RECORD

1. Final Environmental Indicator Inspection Report for Honeywell International, Inc. Prepared by Baker, November 2009.
2. Remedial Investigation Report, Honeywell Pottsville Plant prepared by MACTEC Engineering and Consulting, Inc., October 18, 2005.
3. Deed Restriction.
4. Table 1, Act 2 Standards and EPA's Region 3's Risk Based Concentrations comparison
5. PADEP Approval of Act 2 Final Report, January 6, 2006.
6. PADEP Clean Closed Determination, September 22, 1995.