UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III

STATEMENT OF BASIS

Mactac Industries
Scranton Facility

802 East Corey Street
Scranton, Pennsylvania

EPA ID NO. PAD 05 367 8959

Prepared by
RCRA Corrective Action Branch 2
Land, Chemicals and Redevelopment Division
August 2019

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List of Acronyms

AR	Administrative Record
COC	Constituent of Concern
EPA	Environmental Protection Agency
FDRTC	Final Decision Response to Comments
GPRA	Government Performance and Results Act
MCL	Maximum Contaminant Level
MSC	Medium Specific Concentration
PADEP	Pennsylvania Department of Environmental Protection
RAO	Remedial Action Objective
RCRA	Resource Conservation and Recovery Act
RSL	Regional Screening Level
SB	Statement of Basis

Section 1: 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 Mactac Industries, Scranton Facility located in Scranton, Pennsylvania (hereinafter referred to as the Facility or Site). EPA's proposed remedy for the Facility consists of compliance with and maintenance of land-use restrictions to be implemented through institutional controls. This SB highlights key information relied upon by EPA in proposing its remedy for the Facility.

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 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 Facility in a Final Decision and Response to Comments (Final Decision) after the public comment period has ended.

Information on the Corrective Action program as well as a fact sheet for the Facility can be found by navigating https://www.epa.gov/hwcorrectiveactionsites/contact-information-corrective-action-hazardous-waste-clean-ups-delaware.

The Administrative Record (AR) for the Facility contains all documents, including data and quality assurance information, on which EPA's proposed remedy is based. See Section 8, Public Participation, below, for information on how you may review the AR.

Section 2: Facility Background

2.1 Introduction

The Mactac facility is located at 802 East Corey Street in Scranton, Pennsylvania, on approximately 27 acres of land zoned for manufacturing and commercial uses. The site location map is included as Figure 1.

Mactac is a specialty coater of a variety of papers, films, and foils utilizing solvent based, aqueous based, hot melt, and 100% solid silicone systems.

The facility was established January 1963 by Litton Business Systems; operating under the name of Communication Papers and producing a number of specialty paper products for the government and medical industries. These products included recording, chart paper and paper for electrocardiogram machines.

Prior to 1980, the facility name was changed to Fitchburg Coated Products, Inc. (FCPI), and was still owned by Litton Business Systems. A notification of Hazardous Waste Activity was submitted to EPA on August 14, 1980. FCPI was listed as a generator, transporter, and a treat/store/dispose facility for D001 (ignitable), D002 (corrosive), D003 (reactive), F003, and F005 wastes. On November 17, 1980 a Hazardous Waste Permit Application was submitted for the storage and treatment of hazardous wastes. Subsequently, the assets of FCPI was sold to Technographics Fitchburg Coated Products, Inc. (Technographics) on July 15, 1983.

In 1985, Technographics formally withdrew the 1980 Hazardous Waste Permit Application and submitted a closure plan for the hazardous waste storage and treatment. Technographics indicated that all activities relating to storage and treatment in tanks were discontinued prior to 1982. The facility remained a generator of hazardous waste and therefore continued to store hazardous waste up to the ninety-day limit. A closure inspection of the closed hazardous waste storage area was conducted on September 25, 1985; PADEP found no evidence of contamination either within the storage building or around its perimeter. On March 10, 1986, PADEP sent a letter to Technographics approving the withdrawal of the facility's Hazardous Waste Permit Application.

In 1987, the facility underwent further restructuring when all of the subsidiaries of Technographics, Inc. merged into one corporation known as Technographics, Inc.

Mactac, a division of Bemis, Inc. purchased the facility on January 24, 1994. With the change in ownership, a revised notification of hazardous waste activity was submitted to EPA on January 27, 1994. The facility was listed as a generator, transporter, and a treat/store/dispose facility for D000 (toxic), D001 (ignitable), D003 (reactive), D006, D018, D035, D039, U154, U159, U220, F003, and F005 wastes. The change in ownership also brought change in industrial processes. Most of the solvent-based coaters were taken out and replaced with hot-melt and water-based technologies.

Section 3: Summary of Environmental Investigations

3.1 Environmental Investigations and Remediation

For all environmental investigations conducted at the Facility, soil concentrations were screened against EPA Region III Screening Levels (RSLs) for residential soil and industrial soil. EPA also has RSLs to protect groundwater and soil concentrations were also screened against these RSLs.

Soils

As stated above, the hazardous waste storage area closure was approved by PADEP in 1985. The only other hazardous materials storage on site was in above ground and underground tanks, loading and unloading stations, and several processes. No releases, sampling, or remediation has occurred relating to any of these areas, other than underground storage tanks.

During September 1989, Mactac began removal of the sixteen tanks which comprised the underground tank farm. The tanks were as follows:

Tank Registration #	Capacity	Contents	Installation Date
UNKNOWN	6,000 gallons	Toluene	UNKNOWN
UNKNOWN	15,000 gallons	Tolusol	UNKNOWN
UNKNOWN	8,000 gallons	Methyl Isobutyl Ketone	UNKNOWN
UNKNOWN	8,000 gallons	Waste Tank	UNKNOWN
UNKNOWN	8,000 gallons	Methanol	UNKNOWN
001	4,000 gallons	626 Adhesive	December 1966
002	4,000 gallons	328 Adhesive	December 1966
003	4,000 gallons	630 Adhesive	December 1966
004	4,000 gallons	630 Adhesive	December 1966
005	4,000 gallons	630 Adhesive	December 1966
006	10,000 gallons	Methyl Isobutyl Ketone	December 1966
007	8,000 gallons	Heptane	December 1966
008	20,000 gallons	Oil #2	Unknown
009	20,000 gallons	Oil #2	Unknown
010	8,000 gallons	UNKNOWN	December 1975
011	8,000 gallons	Methyl Isobutyl Ketone	December 1975

In September 1989, four solvent tanks and one wastewater tank were removed from the underground tank farm. There was solvent (methyl isobutyl ketone, heptane, and toluene) contamination in the area where the tanks were buried. The area of contamination was excavated to bedrock and resampled. Solvent contamination was not detected in the second round of samples. During this investigation, groundwater was not encountered. According to a letter dated October 11, 1989 the facility began construction of a new above ground storage tank farm on the site of the cleared bedrock in October 1989.

The 11 remaining underground storage tanks were removed or closed in place in July 1991. This included the five (5) 4,000-gallon adhesive tanks, one (1) 10,000-gallon solvent tank, three 8,000-gallon solvent tanks, and two 20,000-gallon #2 oil tanks. All the tanks, with the exception of the two (2) fuel oil tanks, were removed from their excavation and transported for destruction. The two (2) fuel oil tanks were not excavated and removed as a result of their location immediately adjacent to a water tower structure.

A total of 25 verification soil samples were collected from the excavation areas. Samples from the two (2) fuel oil tanks were obtained by drilling through each tank in three locations. Analysis showed Total Petroleum Hydrocarbon (TPH) concentrations greater than 100 ppm in two solvent tank excavations and throughout adhesive tank excavations. The highest TPH concentration of 3,755 ppm was detected in the location of the #2 fuel oil tank. Approximately 1,100 tons of TPH contaminated soil removed during excavations was stockpiled in a bermed area and covered with plastic.

On June 17, 1991 closure activities were completed on the two (2) fuel oil tanks. The tanks were filled with an inert concrete slurry and a vibratory roller was applied to evenly disperse the slurry mixture.

Approximately 30 cubic yards of soil visibly contaminated with adhesive and approximately 20 feet of 2-inch diameter supply piping were removed. Five (5) individual soil samples and one (1) composite sample were collected from the excavation. Verification analysis showed TPH concentrations greater than 100 ppm in three locations. The highest TPH concentration detected was 2,888 ppm. An additional ten (10) yards of soil from the hot spot were removed and the area was resampled. Two individual soil samples were collected. Verification analysis showed a TPH concentration of 528 ppm. An additional five (5) yards of soil was removed and the area was again resampled. Results showed 263 ppm remaining in the excavation. On July 15, 1991, the facility submitted the soil sample results to PADEP and received approval to backfill the open roadway excavation. The backfilling was completed on July 17, 1991.

On July 8, 1991, 8,891 gallons of rinsate was pumped and transported for disposal. On July 11, 1991, 33 drums of adhesive sludge and 49 polyurethane drums were transported for incineration. Additionally, 55 dump trailers were loaded with 1,189.5 tons of adhesive contaminated soil for disposal.

In August 1991, a Site Assessment Work Plan was submitted to PADEP. The purpose of the plan was to evaluate the effects of the removed underground storage tanks on the surrounding area. On April 16, 1992 the results of the assessment were submitted. A total of six (6) VOC and five (5) TPH soil samples were analyzed. The VOC analysis indicated no contamination in the samples collected. The TPH analysis showed a low-level residual remains in the soils near the water tower structure. Further excavation is not feasible due to its location. The investigation did not identify any other contamination that would warrant further investigation or remediation. On May 9, 1995 PADEP issued a letter to Mactac stating that the August 1991 closure report for the eleven underground storage tanks was approved.

Groundwater

The facility does not have a history of unaddressed spills that would indicate groundwater contamination. In addition, no groundwater was encountered during the 1985 closure of the hazardous waste storage area, nor during the two separate investigation and remediation events of the underground storage tanks which excavated soils to bedrock.

According to the Pennsylvania Geologic Survey the groundwater underlying the facility has been spoiled by mining activities. Much of the water in the upper levels seeps through the fractured coal beds to the deep mineshafts beneath. This groundwater does not meet EPA's Drinking Water Standards and is not used as a potable source.

According to the facility's Pollution Prevention and Contingency Plan there are no known groundwater supplies, either public or private, located downstream from the facility. A public water system supplies water to the local residents from an intake on the Lake Scranton Reservoir. This reservoir is located less than five miles to the northwest of the facility.

Due to past mining activities in the Scranton area which has impacted groundwater quality, the mine locations that directly underlay the facility, and that groundwater seeps through fractured coal beds to the former mine shafts, groundwater in the area of the facility is not used as a source of potable water. A public water system supplies water to the area.

3.2 Environmental Indicators

Under the Government Performance and Results Act (GPRA), EPA has set national goals to address RCRA corrective action facilities. Under GPRA, EPA evaluates two key environmental clean-up indicators for each facility: (1) Current Human Exposures Under Control, and (2) Migration of Contaminated Groundwater Under Control. The Facility met of these indicators on July 20, 2015 and April 30, 2018, respectively.

Section 4: Corrective Action Objectives

EPA's Corrective Action Objectives for the specific environmental media at the Facility are the following:

1. Soils

EPA has determined that EPA's RSLs for industrial use are protective of human health and the environment provided that the Facility is not used for residential purposes. There is no contaminant in Facility soils in concentrations above its industrial RSL. Therefore, EPA's Corrective Action Objective for Facility soils is to control exposure to the hazardous constituents remaining in soils.

2. Groundwater

EPA's Corrective Action Objective for Facility groundwater is to control exposure to groundwater that is a potential potable source. EPA has determined that access or exposure to potable uses of the groundwater is not feasible. The groundwater at the Facility and in the area has been spoiled by mining activities, does not meet drinking water standards, and it is not viewed as a potential potable source. EPA has determined that as there is no potentially complete pathway to this groundwater. As such, EPA is not imposing any additional groundwater restrictions.

Section 5: Proposed Remedy

1. Soils

Because some contaminants remain in Facility soils at levels which exceed residential use, EPA's proposed decision requires the compliance with, and maintenance of, the following use restrictions:

A. Areas shall be restricted to commercial and/or industrial purposes and shall not be used for residential purposes, 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 the Facility provides prior written approval from EPA for such use.

B. In addition, the Facility shall provide EPA with a coordinate survey as well as a metes and bounds survey, of the Facility boundaries. 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.

2. Groundwater

EPA has determined that access or exposure to potable uses of the groundwater is not feasible. The groundwater at the Facility and in the area has been spoiled by mining activities, and it is not viewed as a potential potable source. As EPA has determined that as there is no potentially complete pathway to potable uses of this groundwater, EPA is not imposing any additional groundwater restrictions. The Facility currently meets the Corrective Action Objective.

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 Facility protects human health and the environment by eliminating, reducing, or controlling potential unacceptable risk through the implementation and maintenance of use restrictions. Under EPA's proposed remedy, there would be no risk associated with the soil as long as the Facility property use remains industrial. Soil sampling showed no exceedances of direct contact industrial screening levels and only slight exceedances of subsurface screening levels for TPH. Therefore, EPA is proposing to restrict land use to commercial or industrial purposes at the Facility.
2) Achieve media cleanup objectives	EPA's proposed remedy meets the media cleanup objectives. The cleanup objective for soils is to contain the hazardous constituents that remain in place and control exposure to those wastes in an industrial land use scenario. The proposed remedy meets this objective through the implementation and maintenance of land use restrictions. **The cleanup objective for groundwater is to prevent access to potable uses of groundwater.** The groundwater at the Facility and in the area has been spoiled by mining activities, and it is not viewed as a potential potable source. As such, EPA is not imposing any additional groundwater 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 and the Facility met this objective. The source of contaminants has been removed from the soil at the Facility, thereby, eliminating, to the extent practicable, further releases of hazardous constituents from on-site soils.

Section 6: Evaluation of Proposed Remedy (continued)

Balancing Criteria	Evaluation
4) Long-term effectiveness	The Facility remains an industrial site and which is expected to remain non-residential. Therefore, the proposed long-term effectiveness of the remedy for the Facility will be maintained by the implementation of use restrictions.
5) Reduction of toxicity, mobility, or volume of the Hazardous Constituents	The reduction of toxicity, mobility and volume of hazardous constituents will continue by restricting land uses at the Facility.
6) Short-term effectiveness	EPA's proposed remedy does not involve any activities, such as construction or excavation that would pose short-term risks to workers, residents, and the environment. EPA anticipates that the land use restrictions will be fully implemented shortly after the issuance of the Final Decision and Response to Comments.
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 associated with this proposed remedy have already been incurred and the remaining costs are minimal.
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	PADEP has reviewed and concurred with the proposed remedy for the Facility.

Section 7: 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 actions to remediate soil, groundwater or indoor air contamination at this time and given that the costs of implementing institutional controls at the Facility will be minimal EPA is proposing that no financial assurance be required.

Section 8: Public Participation

Interested persons are invited to 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. Comments may be submitted by mail, fax, or electronic mail to Linda Matyskiela at the contact information listed below.

A public meeting will be held upon request. Requests for a public meeting should be submitted to Linda Matyskiela in writing at the contact information listed below. A meeting will not be scheduled unless one is requested.

The Administrative Record contains all the information considered by EPA for the proposed remedy at this Facility. The Administrative Record is available at the following location:

U.S. EPA Region III
1650 Arch Street
Philadelphia, PA 19103
Contact: Linda Matyskiela (3LD20)
Phone: (215) 814-3420
Fax: (215) 814-3113
Email: Matyskiela.Linda@epa.gov

Attachments:
Attachment A: Index to Administrative Record
Figure 1: Map of Facility

Date: 8/6/2019

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

Attachment A: Index to Administrative Record

Final Environmental Indicator Inspection Report for Mactac Industries, Fitchburg Facility dated December 2002, submitted by Foster Wheeler Environmental Corporation to EPA Region III

Figure 1: Map of Facility