



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION III**  
**Four Penn Center**  
**1600 John F. Kennedy Boulevard**  
**Philadelphia, Pennsylvania 19103-2852**

**SUBJECT:** Long-term Stewardship Assessment  
Air Products and Chemicals, Inc.  
EPA ID: PAD003001070  
7201 Hamilton Boulevard  
Allentown, PA 18195

**DATE:** September 28, 2022

**TO:** Alizabeth Olhasso, Branch Chief  
RCRA CA Branch 2

**FROM:** Andrew Clibanoff, RPM  
RCRA CA Branch 2

**Introduction:**

Long-term stewardship (LTS) refers to the activities necessary to ensure that engineering controls (ECs) are maintained and that institutional controls (ICs) continue to be enforced. The purpose of the EPA Region 3 LTS program is to periodically assess the efficacy of the implemented remedies (i.e, ECs and ICs) and to update the community on the status of the RCRA Corrective Action facilities. The assessment is conducted in twofold, which consists of a record review and a field inspection, to ensure that the remedies are implemented and maintained in accordance with the final decision.

**Remedy Assessment Summary:**

A Final Decision (FD) of No Further Action (NFA) required was issued by the RCRA Corrective Action Program for the Air Products and Chemicals, Inc. Facility located at 7201 Hamilton Blvd. in Allentown, PA on September 23, 1992. Relatively little communication between the Facility and the RCRA Corrective Action Program has occurred in the thirty years since the FD. As a result of this assessment, EPA confirms that the Final Decision remains protective of human health and the environment.

**Facility Background:**

The Air Products and Chemicals, Inc. facility occupies approximately 235 acres in Trexlertown, PA. Figure 1 provides a geospatial map of the facility. The facility was used for decades as Air Products and Chemicals' corporate and group headquarters and as a research and development site. It received its RCRA Part B permit for the storage of hazardous waste generated by onsite research and development and maintenance operations and for its on-site treatment of wastewaters (primarily pH neutralization) prior to discharge to the sanitary sewage system. The tanks/containers utilized for wastewater treatment have not been in use since at least November 2011 when PADEP approved of the clean closure of those units and removed the permit requirement for the facility. Air Products has operated as a large quantity generator at the facility since that time.

EPA had identified several solid waste management units (SWMUs) in the Facility's September 1990 RCRA Corrective Action Permit as being subject to the continuing release provision of Section 3004(u) of RCRA,

most of which were the wastewater treatment units described above, but also included an abandoned sewage treatment plant in the southwest corner of the facility. The integrity of these units was found to be intact and no contaminants above EPA or PADEP screening levels were detected in samples collected in the immediate vicinity of these units, which led to EPA's September 1992 Final Decision of No Further Action required.

#### **Current Site Status:**

A call was held with Air Products representatives on September 20, 2022. A summary of that call is contained in Attachment 1. Air Products has built a new headquarters less than a mile east of the facility and is in the process of moving their facilities to that location. Its former Chemicals Division portion of the facility property (41 acres) was sold a few years ago to Evonik Corp., a specialty chemical company. A hazardous waste container storage area within what is now Evonik property was clean closed with PADEP approval in September 2019 as part of the sale of the property. Air Products is close to a deal with Prologis, a real estate investment trust, for the remaining 194 acres of the facility. Prologis plans to demolish the on-site buildings and to replace them with warehouse space. Air Products will clean close the remaining hazardous waste container storage area as part of the Prologis sale. A current site layout map showing the approximate boundaries of the property now owned by Evonik Corp. is shown in Figure 2.

The Air Products representatives were not aware of any groundwater monitoring at the Facility since the only suspected releases to the environment over the past few decades were from leaking underground storage tanks (USTs) containing heating oil. The leaking tanks along with all associated stained soils were removed and disposed of off-site. No groundwater production wells are utilized at the Facility. The Facility receives its potable/process water from the Lehigh County Water Authority. Discharge from the Facility goes directly to the publicly owned treatment works (POTW).

#### **Long-term Stewardship Site Visit:**

On September 22, 2022, EPA conducted a long-term stewardship site visit to assess the NFA status at the Facility. No one from Air Products and Chemicals, Inc. participated in this site visit, but Facility security personnel were informed of EPA's planned visit. EPA limited its site visit to the exterior perimeter of the property.

Access to the facility is well controlled as the entire property is surrounded by a chain link fence. To gain access to the facility, you must pass through a manned gate-house. The majority of the facility is developed with administrative and research and development buildings and with paved parking lots and roadways. The portion of the facility owned by Evonik Corp. is clearly visible from Hamilton Blvd. A large drainage basin is located in the northwestern corner of the building and a grassy area exists in the southwestern area, presumably where the abandoned WWTP was located. Baseball fields and solar panel arrays are located on the eastern side of the property. No observations that would impact EPA's Final Decision were made during the site visit.

#### **Institutional Controls (ICs) / Engineering Controls (ECs) Status:**

No activity and use limitations or deed restrictions exist for any portion of the Facility property and there are no engineering controls in place since there are no areas of suspected contamination.

#### **Financial Assurance:**

While there is no need for financial assurance because there have been no significant releases of hazardous waste to the environment, Air Product's and Chemicals, Inc. is an international company with a market cap of approximately \$60 billion. As such, it would easily be able to self-insure itself with a corporate guarantee.

**Reporting Requirements/Compliance:**

The facility does not have any RCRA Corrective Action related reporting requirements.

**Mapping:**

In response to the September 20, 2022 call, Air Products provided a map showing the facility boundaries as well as the portion of the property purchased by Evonik Corp. This map is in the process of being digitalized and will be included on the Web Fact Sheet for the facility. A copy of the map is included as Figure 3 in this report.

**Conclusions and Recommendations:**

EPA's September 1992 NFA Final Decision remains protective of human health and the environment. EPA's Web Fact Sheet should be updated with a geospatial map of the facility property boundaries and with information about the portion of the property purchased by Evonik Corp.

**Files Reviewed:**

Permit-related files for the initial RCRA Corrective Action Permit issued in September 1990.

EPA's September 1992 Final Decision

May 2008 Human Health and Migration of Groundwater Under Control Environmental Indicator Reports

**Attachments:**

Figure 1: Geospatial Map of Facility

Figure 2: Site Map

Figure 3: Facility Boundaries

Attachment 1: September 20, 2022 Telephone Conversation Summary

## Figures





**Air Products & Chemicals  
Inc.  
EPA ID# PAD003001070**

**7201 Hamilton Blvd  
Allentown, PA 18195**

 Entire Facility

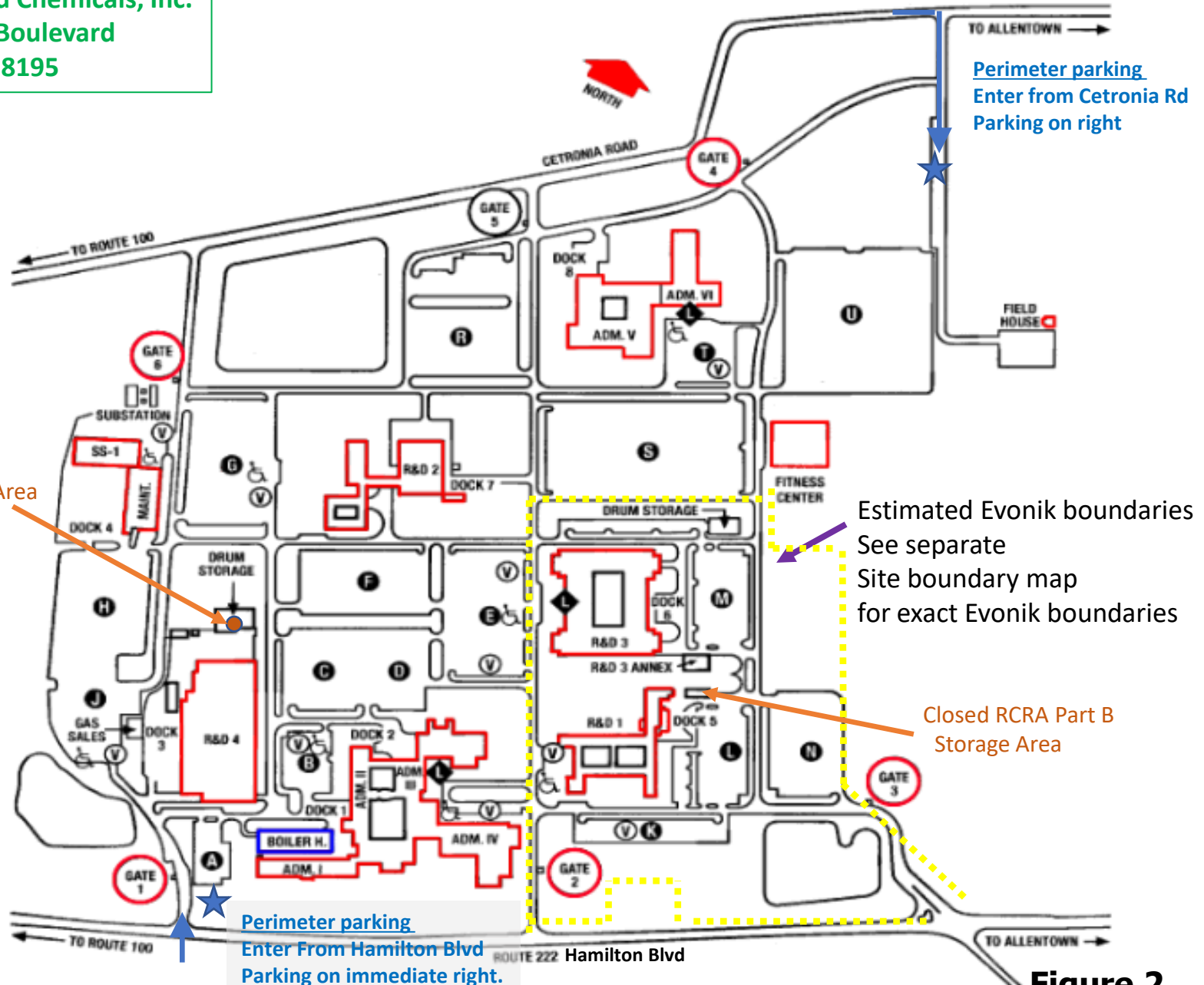


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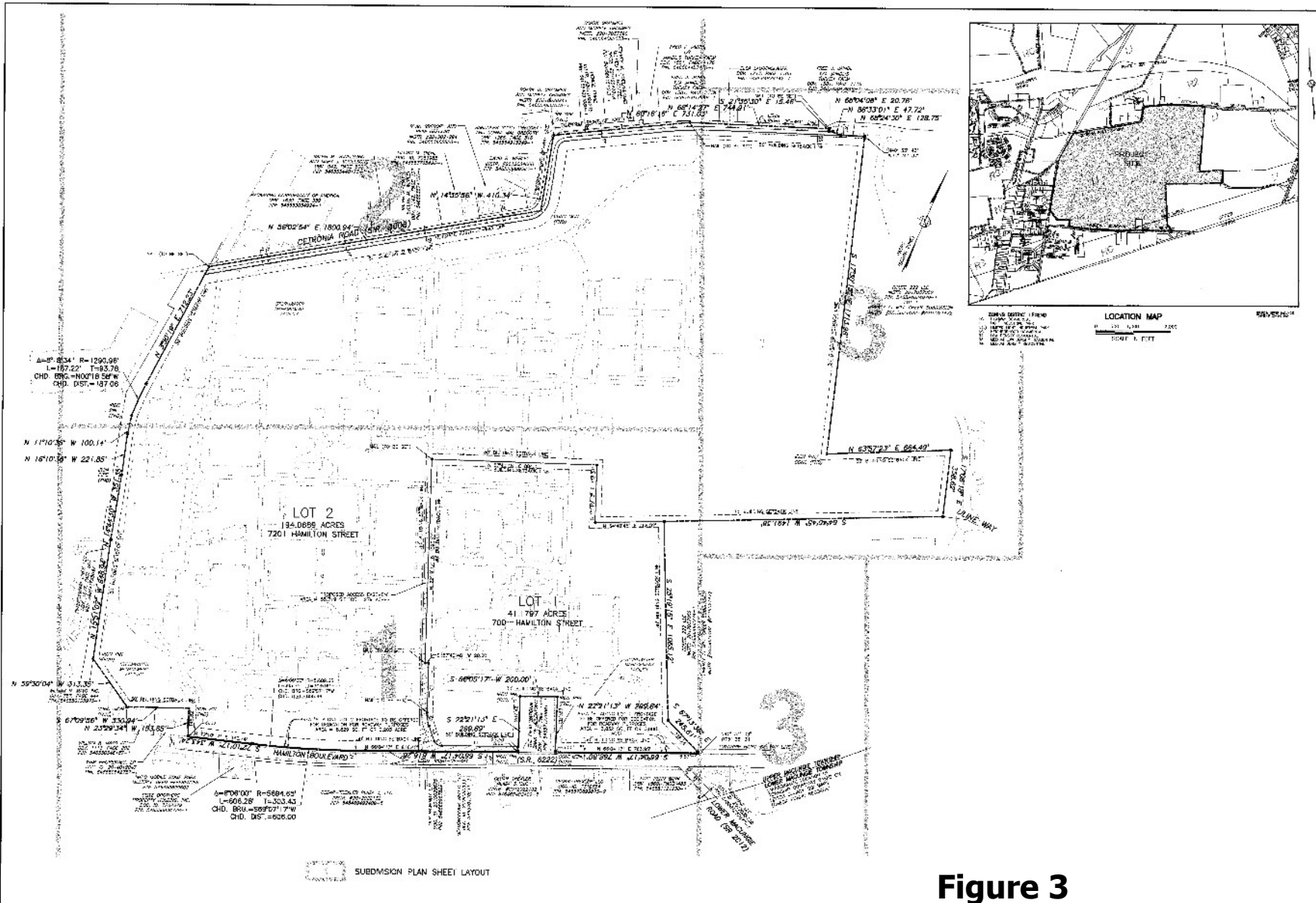
**Figure 1**



**Air Products and Chemicals, Inc.**  
**7201 Hamilton Boulevard**  
**Allentown, PA 18195**



## Figure 2



**Figure 3**  
**Air Products & Chemicals**  
**Facility Boundaries**

**Attachment 1**

**September 20, 2022**

**Telephone Conversation Summary**





**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
Four Penn Center  
1600 John F. Kennedy Boulevard  
Philadelphia, Pennsylvania 19103-2852**

**TELEPHONE CONVERSATION SUMMARY**

**SUBJECT:** Air Products and Chemicals, Inc.  
7201 Hamilton Blvd.  
Allentown, PA 18195  
EPA ID No.: PAD003001070

**PARTICIPANTS:** Andrew Clibanoff, EPA Region 3  
Cindy Clarkson, Air Products  
Jerry Hartig, Air Products

**Date, Time:** September 20, 2022, 11:00 am, Teams Meeting

EPA requested a conversation with Air Products and Chemicals, Inc. as part of a Long Term Stewardship (LTS) Inspection for the 235-acre RCRA Corrective Action Facility located at 7201 Hamilton Blvd. in Allentown, Lehigh County, PA. Mr. Clibanoff explained the LTS Program objective is to ensure that historical Agency Final Decisions remain protective of human health and the environment over time. EPA had issued a No Further Action Required Decision for the Air Products Facility in September 1992 and little to no communication between the Facility and EPA's RCRA Corrective Action Program has occurred since.

When asked if any known releases of hazardous wastes or substances had occurred at the property since EPA's Final Decision, Mr. Hartig stated the only known releases were associated with leaking underground storage tanks (USTs) used to contain heating oils. Stained soils around the leaking tanks were excavated and disposed of off-site. One UST remains at the Facility. The rest of the USTs were replaced with aboveground storage tanks (ASTs) with secondary containment.

Mr. Clibanoff asked if the footprint of the Facility property had changed since September 1992. Mr. Hartig explained that Air Products spun off its Electronics Division from the rest of the company and formed a new company called Versum Materials around five or six years ago. Versum Materials was going to also acquire Air Product's Chemicals Division until a separate deal with another company, Evonik Corp. was made for those assets. Evonik purchased the Chemical Division portion of the Facility property (approximately 41 acres) three or four years ago and continues to operate there today. Versum Materials may have conducted operations at the Facility for a short time, but never owned any of the property and no longer does any business at this location. A hazardous waste container storage area was clean closed as part of the Evonik Corp. transaction. PADEP approved of the closure in correspondence dated 9/20/19. Ms. Clarkson agreed to send EPA a copy of the approval letter.

Air Products is currently in the process of selling the remainder of the 7201 Hamilton Blvd. Facility to Prologis, a real estate investment trust company. Prologis plans to raze the buildings on-site and replace them with warehouse space. A 90-day container storage area is currently going through clean closure prior to the sale. Ms. Clarkson stated that a 30-day closure notice will be sent to inform PADEP of this closure soon. Ms. Clarkson has been in touch with Melissa Gross from PADEP's NERO regarding the 90-day container storage area.

Ms. Clarkson will try to locate and provide EPA with Facility maps that clearly showed the Facility property boundaries as well as the portion sold to Evonik and portion in the process of being sold to Prologis.

Mr. Hartig stated that Air Products has moved its headquarters to a location less than a mile east of the existing Facility. Mr. Hartig pointed out its location on the aerial map of the Facility shown on EPA's Corrective Action Website (at the intersection of Air Products Blvd. and Mill Creek Road).

Mr. Clibanoff asked about the storage units that were clean closed in November 2011 according to RCRA Info records. Mr. Hartig stated that those were PADEP permitted units used mainly by the Facility for pH neutralization. The Facility has operated as a large quantity generator of hazardous waste since that time. No treatment, disposal or storage of hazardous waste for greater than 90 days occurs at the Facility.

Mr. Hartig was not aware of any groundwater monitoring at the Facility since the only suspected releases to the environment were from the USTs. No groundwater production wells are utilized at the Facility. The Facility receives its potable/process water from the Lehigh County Water Authority. Discharge from the Facility goes directly to the publicly owned treatment works (POTW). The Facility does have a stormwater discharge permit. No activity and use limitations or deed restrictions exist for any portion of the Facility property and there are no engineering controls in place since there are no areas of suspected contamination.

#### Contact Information:

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