



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

SUBJECT: Long-term Stewardship Desktop Assessment
Scott Paper Company Plaza
EPA ID: PAD001287879
Scott Plaza Rt 291
Lester, PA 19113

DATE: December 29, 2022

TO: Alizabeth Olhasso, Branch Chief
RCRA CA Branch 2

FROM: Priscilla Ortiz, 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:

On September 24, 2012, in a Final Decision and Response to Comments (FDRTC), EPA announced its selection of a final remedy of, "Corrective Action Complete without Controls" for the Former Scott Paper Research Facility (Facility) located at Route 291 & Tinicum Island Road in Tinicum Township, Delaware County, Pennsylvania. EPA has determined that no further action is required to make this property suitable for any type of land use which is supported by the August 7, 2012, Statement of Basis for the Facility. Limited data was available to make the no further action determination, therefore ICs or ECs might be required if further development (industrial or residential) occurs at the facility.

Facility Background:

The Former Scott Paper Research Facility was a paper and paper pulp product research and development facility. Scott Paper Company owned and operated Scott Plaza since the beginning of its construction in 1961. The 28-acre facility (formerly Scott Plaza III, currently International Plaza) was located on the southern side of Route 291, north of the Philadelphia International Airport, in Tinicum Township, Delaware County, Pennsylvania. The Tinicum National Environmental Center is located north of the facility; south and west of the facility are industrial complexes; and the Philadelphia International Airport is located east of the facility. The property is surrounded by commercial properties and transportation infrastructure, including South Governor Printz Boulevard and Interstate 95 to the north, and Philadelphia International Airport parking, south, and east. Wetlands and ponds are located north of

the highways. The Delaware River is located south of the airport. Based on the USEPA Envirofacts Enforcement & Compliance History Online database the population density within three miles of the former facility is estimated to be 2,714 people/square mile based on the 2000 census data and includes approximately 23,980 households and 25,763 housing units. A location map and a Facility layout are attached as Figures 1 and 2, respectively. The original facility and associated building no longer exist. The area is open space and parking lots for the International Plaza complex.

Scott Plaza I, II, and III were completed in 1961, post 1961, and 1969, respectively. Prior to construction, the property was swampland. Scott Plaza I was the corporate offices, Scott Plaza II was the administrative support staff offices, and Scott Plaza III was the research and development building. From the early 1970s to 1986, Scott Plaza III was used for the research of organic synthesis in paper and paper pulp technology. From 1986 through at least 1991, Scott Plaza III was used for research and development of "Wet Wipes", lotion manufacturing, fiber technology, paper-making mill trials, and latex polymer emulsions.

In August 1980, the Scott Paper Company filed a Notification of Hazardous Waste Activity form for the Scott Paper Research Facility. The facility was assigned EPA ID Number PAD001287879. In November 1980, the Scott Paper Company submitted a Part A Hazardous Waste Permit Application for the Scott Paper Research Facility for its storage of hazardous waste. The hazardous wastes identified on the permit application and the notification included spent halogenated solvents (F001 and F002), spent nonhalogenated solvents (F003 and FOOS), ignitable hazardous waste (D001), reactive waste (D002), corrosive waste (D003), toxic waste (D000), and commercial chemical products hazardous wastes (U and P listed). The facility storage code was identified as SO. In July 1983, the Scott Paper Company requested to withdraw its Part A Permit Application.

In October 1986, the facility contacted Pennsylvania Department of Environmental Protection (PADEP) and the US Coast Guard to report a rupture of the 10,000-gallon No. 2 fuel oil UST used for the boiler at Scott Plaza III. The UST was formerly located south of the Research Facility, west of the former exterior drum storage shed (SWMU 2). The release was cleaned-up and under PADEP oversight reviewed and closed. The UST and 16,634 tons of contaminated soil were removed and disposed offsite by Boyertown Sanitary Disposal, Incorporated. There is no closure documentation for the SWMUs. There were no documented releases to air, groundwater, sediment, and soil from the SWMUs, and the areas formerly occupied by the SWMUs are currently capped with a parking lot. Accordingly, no exposure pathway/release controls are relevant. Note: No records of this release were available at the time of the Environmental Priorities Initiative Preliminary Assessment (PA) completed by NUS Corporation for the USEPA dated July 31, 1991 (1991 PA). During the 2012 site visit, the facility representative stated he had no knowledge of this UST. Its removal would have been handled by the corporate facilities maintenance department. Per the 1991 PA, PADEP never issued a notice of violation (NOV), and the matter was considered closed. Scott Paper Company merged with Kimberly-Clark in October 1995 and sold Scott Plaza to Koll Bren Scheiber Realty Advisors of Newport Beach, CA (sometime prior to 2002).

On February 15, 2012, EPA Region 3 and Michael Baker Jr., Inc. performed an Environmental Indicator (EI) Inspection at the facility. Based upon information in the EI Inspection Report dated April 2012, EPA identified five former Solid Waste Management Units (SWMUs) at the facility within Plaza III. These SWMUs included Chemical Storage/Hazardous Waste Room (SWMU #1), Drum Storage Shed

(SWMU #2), Parts Cleaning Room (SWMU#3), Drum Coral (SWMU#4), and Trash Dumpster (SWMU #5). Currently, Plaza I and II are operational and include 27.05 acres of land. Plaza III was demolished in 2003. The SWMUs no longer exist and there were no documented releases; the SWMU areas are currently an active asphalt-paved parking area for International Plaza.

Current Site Status:

The site is essentially capped with pavement and is surrounded by commercial properties and transportation infrastructures. No contaminated soil and/or groundwater are expected to be found at the site.

Mapping:

The Facility property boundary has been geospatially mapped. The geospatial map is available at the Facility's EPA Factsheet (<https://www.epa.gov/hwcorrectiveactioncleanups/hazardous-waste-cleanup-scott-paper-company-plaza-lester-pennsylvania>) under the "Reports, Documents and Photographs" section.

Conclusions:

The facility no longer exists and is currently a parking lot and open grass area for International Plaza surrounded by commercial properties and transportation infrastructure. Air releases due to operations are not applicable and no contaminated soil and/or groundwater are known to be present as a result of previous facility operations. In 1986 a release of No. 2 fuel oil to the soil occurred, which was remediated to the satisfaction of PADEP during removal of the ruptured UST and the matter was considered closed. No known releases to groundwater have occurred, therefore, it is not expected that subsurface soils or groundwater have been contaminated by facility operations that would create vapor intrusion issues for onsite or neighboring buildings. Accordingly, no vapor intrusion exposure pathway controls are relevant. The areas where the SWMUs were previously located are currently a parking lot and there were no known releases documented from the SWMUs. No other releases have been recorded for the facility to groundwater, surface water or soil, and the facility no longer exists and is essentially capped with pavement.

EPA determined in its FDRTC that no further action is required to make this property suitable for any type of land use which is supported by the August 7, 2012 Statement of Basis for the Facility. Limited information was available to make the no further action determination, therefore ICs or ECs might be required if further development (industrial or residential) occurs at the facility.

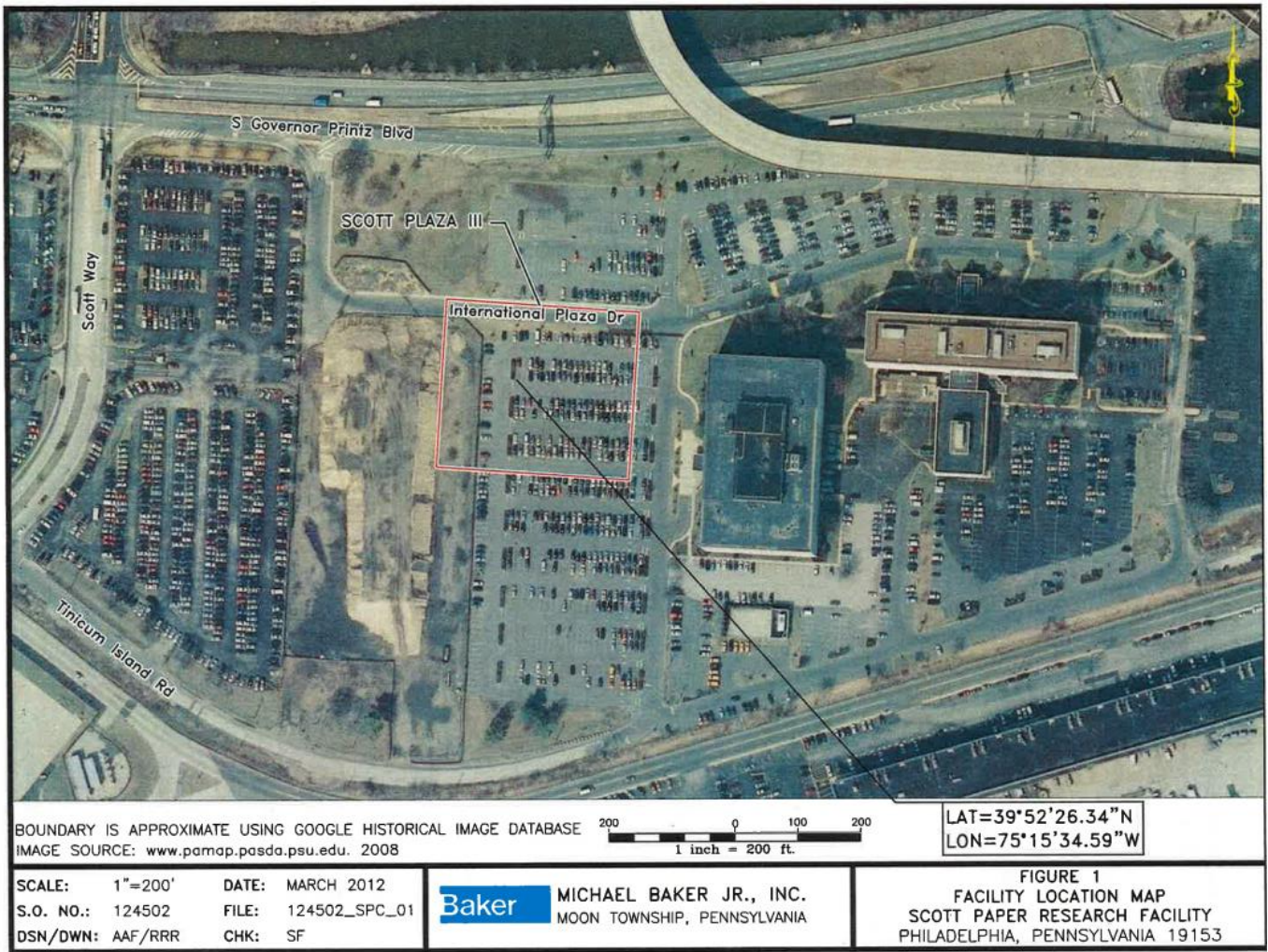
Files Reviewed:

Statement of Basis, Prepared by EPA August 7, 2012

Final Decision and Response to Comments, Prepared by EPA September 24, 2012

Environmental Indicator Inspection Report, Prepared by Baker April 2012

Map of Facility



Engineering Control/Institutional Control
Corrective Action Remedy Summary

Facility Name	Scott Paper Company Plaza			
Address	Scott Plaza Rt 291, Lester, PA 19113			
EPA ID Number	PAD001287879			
Are there restrictions or controls that address:	Yes	No	Areas	Description of restrictions, controls, and mechanism
Groundwater		x		
Residential Use		x		
Excavation		x		
Vapor Intrusion		x		
Capped Areas		x		
Other Engineering Controls		x		
Other Restrictions		x		

LTS Checklist Template

<u>IC Review and Assessment Questions:</u>	<u>Yes</u>	<u>No</u>	<u>Notes</u>
• Have the ICs specified in the remedy been fully implemented? Implementation mechanism in place?			N/A
• Do the ICs provide control for the entire extent of contamination (entire site or a specific portion)?			N/A
• Are the ICs eliminating or reducing exposure of all potential receptors to known contamination?			N/A
• Are the ICs effective and reliable for the activities (current and future) at the property to which the controls are applied?			N/A
• Have the risk of potential pathway exposures addressed under Corrective Action changed based on updated screening levels and new technologies?		x	
• Are modifications to the IC implementation mechanism needed? (i.e. UECA Covenant, Permit or Order)		x	If the property is redeveloped (industrial or residential), ICs and ECs restricting land and groundwater use might be required.
• Are there plans to develop or sell the property?		x	
• Have all reporting requirements been met?	x		

<u>Groundwater Review and Assessment Questions:</u>	<u>Yes</u>	<u>No</u>	<u>Notes</u>
• Is groundwater onsite used for potable purposes?		x	
• Is the Facility connected to a public water supply?	x		
• Have any new wells been installed at the facility?		x	
• Are the current groundwater flow rate and direction similar as mentioned in the previous studies?	x		
• Groundwater contaminants stable or decreasing in concentration?	x		

• Are groundwater monitoring wells still in place (# wells)?		x	There are no wells at the site.
• Any evidence or reason to re-evaluate the number and location of monitoring points and/or monitoring frequency?			N/A
• For wells where groundwater monitoring is no longer required, have the wells be decommissioned?	x		
• Is there evidence of monitored natural attenuation occurring in groundwater?			N/A
• Has (active remediation system) been maintained as necessary?			N/A
• Is the (groundwater containment system) effectively containing COCs and protecting potential receptors (surface water body and/or groundwater resource) via hydraulic control?			N/A
• Have notification letters been sent to the local POTW, County Department of Health, and Planning and Zoning Department regarding groundwater use restrictions?		x	

<u>Surface and Subsurface Soil Review and Assessment Questions:</u>	<u>Yes</u>	<u>No</u>	<u>Notes</u>
• Is the facility being used for residential purposes?		x	
• Have there been recent construction or earth-moving activities or plans for such?		x	

<u>Engineered Cap or Cover Review and Assessment Questions:</u>	<u>Yes</u>	<u>No</u>	<u>Notes</u>
• Have geosynthetic/vegetative landfill caps (name) been properly maintained?			N/A
• Have any repairs been necessary? (i.e. regrading, filling, root removal)			N/A
• Is the leachate collection system operating and effectively preventing groundwater contamination?			N/A



<u>Vapor Intrusion Review and Assessment Questions:</u>	<u>Yes</u>	<u>No</u>	<u>Notes</u>
• Have there been construction of new structures within the vapor intrusion restriction zone(s)?			N/A
• Is the vapor intrusion mitigation system radius of influence effective for the structure in which its installed?			N/A

<u>Miscellaneous Review and Assessment Questions:</u>	<u>Yes</u>	<u>No</u>	<u>Notes</u>
• Is the security fence intact?			N/A
• Is the appropriate signage posted?			N/A