



Long-Term Stewardship Assessment Report

MPM SILICONES, LLC

EPA ID #: WVD004325353

FRIENDLY, WV 26146

Assessment Date: **October 15, 2024**

Introduction: In EPA Region 3 and its RCRA-Authorized states, a Long-Term Stewardship (LTS) or “LTS Assessment Visit” refers to a site inspection that includes both a record review and a field inspection to ensure that the remedies are implemented and maintained according to the final decision. This involves evaluating whether a previously remediated facility or a former facility site continues to meet the environmental protection standards over time by ensuring that engineering controls (ECs) are maintained and that institutional controls (ICs) continue to be enforced. The LTS program periodically assesses the efficacy of the implemented remedies (i.e., ECs and ICs) and to update the community on the status of the RCRA Hazardous Waste Cleanup Program (aka Corrective Action) facilities.

Facility Background: The MPM Silicones, LLC Facility (MPP Silicones or Facility, also formerly known as the Sistersville Plant or as G.E. Silicones) is a chemical manufacturing plant near Friendly, Tyler County, West Virginia, where production wastes are generated, stored, and treated. The Facility is located east and immediately adjacent to WV State Route 2, approximately 2.6 miles south of Friendly, WV. The Ohio River is approximately 1000 feet west of the Facility entrance.

Initially, EPA Region 3 issued a RCRA Corrective Action Permit (CAP) to the Union Carbide Corporation (UCC), the initial owners at the facility, for operating a hazardous waste treatment, storage, and disposal facility in Sistersville, WV. The CAP was issued on December 17, 1990. The permit required a Verification Investigation (VI), a RCRA Facility Investigation (RFI) and, if needed, a Corrective Measures Study (CMS) for several Solid Waste Management Units (SWMUs) at the Facility. The EPA-issued CAP comprises a portion of the Facility’s full RCRA permit. The other portion of the permit was issued by the WVDEP and addressed the provisions of RCRA for which the State of West Virginia was authorized as of 1990.

The Facility changed ownership from UCC to OSi Specialties, Incorporated (OSi) in 1993. OSi was purchased by Witco Corporation in 1995. On September 1, 1999, Witco Corporation and Crompton & Knowles (C&K) merged to form CK Witco Corporation, which underwent a name change to Crompton Corporation on April 27, 2000. On July 31, 2003, Crompton Corporation sold the Facility to GE Silicones WV, LLC, which was merged into GE Silicones, LLC on August 1, 2004.

On December 4, 2006, GE Silicones, LLC was renamed to Momentive Performance Materials, also known as MPM Silicones, LLC. MPM Silicones, LLC maintains all of GE Silicones, LLC’s former responsibilities and obligations under all governmental orders, permits, authorizations and licenses in connection with the operation of the Facility.

The CAP was last modified on September 24, 1997, and specific corrective actions and monitoring requirements were added. A timely renewal application for the RCRA Part B permit was submitted to the West Virginia Department of Environmental Protection (WVDEP). A continuance of the current CAP was granted by EPA Region 3 in a letter dated November 14, 2002, until a new CAP was issued by EPA. In 2003, the State of West Virginia was authorized by EPA to administer the RCRA Corrective Action Program. As a result, a new full RCRA TSD permit was issued by WVDEP that included the corrective action requirements. In July 2018, WVDEP issued a renewal permit, which will remain in effect through July 26, 2028.

Current Site Status: The Facility is a large quantity waste generator, generating approximately 20,000,000 lbs. of hazardous waste per year. The waste is either treated or disposed of on site or sent off-site for final disposal. WVDEP is providing oversight for the hazardous waste cleanup activities at the Facility, which is well into the long-term stewardship phase, under the current RCRA permit.

Long-Term Stewardship Site Visit: On October 15, 2024, WVDEP conducted an LTS assessment site visit to discuss and assess the status of implemented remedies with representatives of the MPM Silicones facility. This is the first LTS visit to the site since the September 11, 2014 visit conducted by EPA along with WVDEP personnel.

The attendees were:

Name	Organization	Email Address
Kenan Cetin	West Virginia Dept of Env. Protection (WVDEP)	kenan.cetin@wv.gov
Johnsely Cyrus	WVDEP	johnsely.cyrus@wv.gov
Michael Hofe	WVDEP	michael.p.hofe@wv.gov
Amy Higgs	MPM Silicones, Inc.	amy.higgs@momentive.com
John Garner	MPM Silicones, Inc.	john.garner@momentive.com
Jim Gibson	MPM Silicones, Inc.	James.gibson@momentive.com

Institutional Controls (ICs) Status: The main IC element at the MPM Silicones is a restriction on the use of groundwater for potable purposes. This control is being implemented as a requirement of the Facility's RCRA permit.

Engineering Controls (ECs) Status: Two main components of ECs at the Facility are the earthen caps and surface water diversion ditches constructed in the North Inactive Site (NIS) and the South Inactive Site (SIS) to limit the amount of surface water runoff to Sugar Camp Run and limit infiltration into the subsurface.

Groundwater monitoring of NIS (annual monitoring of nine wells) and SIS (biannual monitoring of 6 wells), groundwater monitoring of No. 3 Sludge Pond and BTEX Area (biannual monitoring of 8 wells), groundwater recovery well operation, and the leak rate detection associated with the Wastewater Treatment System are the other engineering control elements of the Final Remedy. Furthermore, the Facility is entirely fenced and access is controlled.

WVDEP confirmed that Facility is complying with the ECs summarized above and that each of these is fulfilled, maintained or in place.

Reporting Requirements/Compliance:

The Facility has been compliant with respect to the reporting requirements over the years. MPM Silicones currently submits biannual progress reports on the status of corrective measures: one for the first half of a given year, usually submitted in July, and an annual report summarizing the full year's results, submitted in the first quarter of the following year.

Financial Assurance: The Facility currently has an updated cost estimate of \$5,055,000, for post-closure and corrective action activities, which was reviewed and approved by WVDEP in March 2024. These funds are secured via a surety bond and standby trust agreement.

Mapping: The agencies have a geospatial PDF map showing the Facility boundaries, and the EPA's website map is accurate. The need to develop an Environmental Covenant in the near future was discussed with the facility. The surveyed boundary coordinates of the two capped engineering control areas, NIS and SIS, will be captured for inclusion in the environmental covenant, which will then be made available for an update on the EPA website.

Conclusions and Recommendations:

During this assessment visit, WVDEP observed and verified that the engineering controls selected for the Facility, summarized above, are implemented and remain intact and undamaged (see attached images). Monitoring wells were verified to be in good condition (see attached images). Furthermore, no IC deficiencies have been identified at the Facility.

Attachments:

Image 1: Water/runoff diversion ditch near along the eastern boundary of the NIS, looking southwest.

Image 2: Water/runoff diversion ditch near along the eastern boundary of the NIS, looking northwest.

Image 3: Monitoring wells, NF-8, NF-6 and NF-9 (furthest) in the southern part of NIS.

Image 4: Water/runoff diversion ditch cutting across NIS, looking west/northwest.

Image 5: Monitoring well NF-2 in the northern half of NIS.

Image 6: Monitoring well NF-5A, to the southwest of NIS.

Image 7: Monitoring well 5703 in the SIS area.

Image 8: Monitoring well 5704 in the SIS area.

Image 9: Monitoring well 5705 in the SIS area.

Image 10: Monitoring well 5702 in the SIS area.



Image 1: Water/runoff diversion ditch near along the eastern boundary of the NIS, looking west/southwest.



Image 2: Water/runoff diversion ditch along the eastern boundary of the NIS, looking northwest.



Image 3: Monitoring wells, NF-8, NF-6 and NF-9 (furthest) in the southern part of NIS.



Image 4: Water/runoff diversion ditch cutting across NIS, looking west/northwest.



Image 5: Monitoring well NF-2 in the northern half of NIS.



Image 6: Monitoring well NF-5A, to the southwest of NIS in the plant area.



Image 7, 8, 9 & 10: Monitoring wells 5703, 5704, 5705 & 5702 in the SIS area.