



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III

STATEMENT OF BASIS

Ametek, Inc.
Odenton, Maryland

EPA ID: MDD082612110

Prepared by the
Office of Land, Chemicals and Redevelopment Division
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Section 1: Introduction

The United States Environmental Protection Agency (EPA) prepared this Statement of Basis (SB) to solicit public comment on its proposed remedy for the former Ametek Inc. facility (Facility), located in Odenton, Maryland (Figure 1). EPA's proposed remedy for the Facility consists of land and groundwater use restrictions to restrict activities that may result in exposure to contaminants remaining in the soil and groundwater at the Facility.

EPA has compiled an administrative record (AR) containing all documents, including data and quality assurance information, upon which EPA's proposed remedy is based. Attachment 1 lists the AR documents. To review the AR documents listed, see Section 6, Public Participation.

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.* The Corrective Action Program requires that owners or operators of facilities subject to certain provisions of RCRA investigate and address releases of hazardous waste and or hazardous constituents, usually in the form of soil or groundwater contamination, that have occurred at or emanated from their properties. EPA currently implements the Corrective Action Program in the State of Maryland because Maryland is not authorized to implement Corrective Action under Section 3006 of RCRA.

EPA is providing a thirty (30) day public comment on EPA's proposed remedy for the Facility. EPA may modify its proposed remedy based on comments received during this period. EPA will evaluate comments received and make a final remedy decision in a Final Decision and Response to Comments 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 to <https://www.epa.gov/hwcorrectiveaction/hazardous-waste-cleanup-ametek-inc-intercontinental-export-import-inc-odenton-md>.

Section 2: Facility Background

The Facility is a 4.6-acre property located in Odenton, Maryland (see Figure 1) consisting of two parcels: the manufacturing parcel and the parking lot parcel. In the 1940s, the Facility building was constructed by the National Plastic Products Company. In 1971, Amtech, Inc. purchased the facility from the Enjay Chemical Company (formerly known as the National Plastic Products Company). In 1977, Ametek acquired Amtech, Inc. through a corporate merger. In 1988, Ametek became Ketema Corporation through corporate restructuring. In 1996, Ketema Corporation was acquired by Specialty Filaments, Inc. (SFI) and operated the Facility under the name SFI Odenton Plant (SFI Odenton) from 1996 to 2001. SFI's operations at the Facility included extruding plastic into threads and fibers for use in various products. In 2001, the Facility was purchased by RSN Holdings which subsequently sold the Facility to Intercontinental Export Import, Inc. (IEI). IEI used the Facility building warehouse for the storage of plastic pellets and recyclable plastic products. Prior to IEI's ownership, the Facility building involved extruding plastic to form thin strands/fibers/threads and the use and storage of various chemicals including pigments, colorants,

and oils. In 2008, the Facility was purchased for possible redevelopment by SIC Odenton (formerly known as StonebridgeCarras, LLC) (Stonebridge), a real estate development company. Stonebridge demolished the Facility building in the Spring of 2012, except the slab floor and partial basement.

Section 3: Summary of Environmental History

There were numerous sources of contamination at the manufacturing parcel. An underground heating oil release, discovered in the 1980s, at the adjacent International Paper (IP) facility (northeast of the Facility) resulted in an area of petroleum-impacted soil and groundwater contamination at the Facility. Soil and groundwater at the Facility were contaminated with light non-aqueous phase liquid (LNAPL). Groundwater in the shallow aquifer had slight historic exceedances of benzene and naphthalene above Maximum Contaminant Levels (MCLs) that had partially migrated under the Facility.

In the 1990s, under a Corrective Action Plan (CAP) with MDE's OCP, International Paper installed a remediation system at the Facility. Under the CAP, a remediation system was installed at the Facility in the 1990s. The system was designed to remove LNAPL from groundwater using skimmer pumps and a soil vapor extraction system to remove residual soil contamination.

In 2006, elevated concentrations of volatile organic compound (VOC) vapor were found beneath the floor slab in the southern portion of the Facility building. Thereafter, a blower was installed to vent subslab VOC vapor. Also, fill material containing coal dust and/or coal slag was found beneath the southern portion of the building. The fill material contained lead, mercury, and arsenic concentrations that exceeded MDE Non-Residential Cleanup Standards. This area was capped with concrete.

In late 2006 and early 2007, Phase I and II Environmental Site Assessment (ESA) activities were conducted at the Facility. On May 30, 2007, SIC Odenton II, LLC applied to the MDE Voluntary Cleanup Program (VCP) as an "Inculpable Person" (IP) for the Facility. The MDE VCP application included the Phase I and II ESA and previous environmental reports. The Facility was accepted into the MDE Voluntary Cleanup Program in December 2007. After several rounds of additional Phase II ESA activities, Geo-Technology Associates, Inc. prepared a Response Action Plan (RAP) on the behalf of SIC Odenton II, LLC.

In November 2011, MDE OCP approved the termination of the International Paper's operation of the remediation systems when it appeared that the LNAPL remediation operations were not an efficient approach. Bimonthly gauging and semiannual monitoring of all wells was conducted to evaluate to assess the recharge and mobility of LNAPL and whether the recovery system should be reactivated. Under MDE's VCP, Stonebridge demolished the Facility building structure in the Spring of 2012, except the slab floor and partial basement. Later in 2012, the floor was back filled with soil. On November 1, 2016, the former Ametek Facility was issued a Certificate of Completion (COC) under the VCP, for commercial land use.

The RAP was approved in 2010 by MDE's VCP. The RAP identifies three main areas of concern (AOC) which have been addressed in the following ways:

- Remedial Area 1 (RA-1) - A limited area of lead-containing fill, including coal and coal slag

(bottom ash), is located on the western portion of the Facility in the manufacturing parcel. This area is known as Response Area 1 (RA-1). This area is currently capped with the concrete slabs of the former buildings. Pursuant to the RAP, the RA-1 must remain capped with either buildings, a pavement profile, or 2 feet of approved clean fill over a geotextile marker fabric. If future disturbance occurs, such as for grading, construction, etc., then the excavated materials must be properly handled and disposed.

- OCP Area - An area of petroleum contaminated soils and groundwater is located on the central portion of the Facility on the manufacturing parcel, apparently resulting from a historical release from the former heating oil above-ground storage tank (AST) and/or the associated underground lines and the presence of residual light non-aqueous phase liquid (LNAPL) above Maximum Contaminant Levels (MCLs). The AST, the underground storage tanks (USTs), and the underground lines were removed in coordination with MDE by the former property owner, International Paper Company ("IP"). IP performed the site remediation and monitoring of the diesel release at the Facility under MDE OCP's oversight. A request was submitted to MDE on January 3rd, 2017 to discontinue annual groundwater sampling activities and discontinue LNAPL recovery as historic recovery operations showed that further recovery would yield minimal additional LNAPL and not significantly reduce risk. The data shows that the last 10 plus years of recovery did not yield significant amounts of LNAPL. The OCP case was closed on August 31, 2017 after approximately 20 years of remedial efforts, although residual impacts remain, primarily in the vicinity of the groundwater interface at depths of roughly 12-15 feet below grade. MDE concluded that contamination had been remediated to the maximum extent practicable, and that no further action was required.

VOCs - Some areas of soil vapor and sub-slab vapor impacts that were previously identified at the Facility, resulted from the use of solvents in the former manufacturing operations. Environmental studies included a site-wide grid of vapor sampling points, followed by a targeted sampling approach in key areas. The primary VOC of concern was PCE. The Phase II ESA showed that the vapor impacts were not associated with a VOC plume, but were trapped beneath the Facility's impermeable building slabs and pavement. The most significant area of vapor impacts at the Facility was on the southwestern portion adjacent to the IEI Property, which is on the western-central portion of the Facility, east of Telegraph Road. At this location, soil vapor extraction was performed for approximately 7 months, and post-extraction sampling for 12 additional months showed a significant reduction in soil vapor impacts, to below commercial-based comparison values.

The COC, and the corresponding February 8th, 2017 MDE Environmental Covenant (EC) for the Facility, has several limiting provisions for the manufacturing parcel, as follows:

- Groundwater – Groundwater may not be used for any purpose, other than sampling.
- Groundwater Encountered During Excavation – Any groundwater encountered during future construction work must be appropriately containerized, tested, and properly disposed, with specified notifications to MDE.
- Soil Excavation and Disposal – Any excavated material taken off-site must be appropriately characterized for disposal, and no material shall be transferred to a property other than a disposal facility without prior MDE approval.
- RA-1 – The cap at RA-1 must be maintained and inspected (twice per year).

- The OCP Areas – If excavation occurs deeper than 12 feet in the OCP Area, appropriate worker safety, material handling, and MDE notifications must occur.
- Vapor Barrier – New Construction – If new buildings are constructed, suitable vapor barriers or other systems, and indoor air testing at completion are required, or additional testing can be performed beforehand to demonstrate that such systems and indoor air testing are not needed.

Section 4: Corrective Action Objectives

Soil

EPA's Corrective Action Objectives (CAOs) for soil is to prevent human exposure to contaminant concentrations above the MDE allowable risk range for residential use of 1×10^{-5} to 1×10^{-6} and non-cancer HI of greater than 1.

Groundwater

EPA expects final remedies to return usable groundwater to its maximum beneficial use within a timeframe that is reasonable given the circumstances of the project. For projects where aquifers are either currently used for water supply or have the potential to be used for water supply, EPA will use the National Primary Drinking Water Standard 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 as the corrective action objective for groundwater. s. and control exposure to the hazardous constituents remaining in the groundwater until applicable MCLs are achieved throughout the area of contaminated groundwater and demonstrated by groundwater monitoring results. Therefore, EPA's CAOs for Facility groundwater are to achieve MCLs throughout the groundwater plume and control exposure to the hazardous constituents remaining in the groundwater until applicable MCLs are achieved.

Vapor Intrusion

EPA's CAO for soil vapor intrusion into occupied buildings located at the Facility is to prevent worker exposure to VOCs emanating from subsurface soil or groundwater at concentration exceeding industrial air Regional Screening Levels set at a cancer risk of 1 in 100,000 or hazard quotient of 1.

Section 5: Proposed Remedy

EPA's proposed remedy for the Facility consists of the following components:

Soil

Because some contaminants remain in Facility soils at levels which exceed residential use, EPA's Proposed Remedy requires the following:

Maintain the integrity of the RA-1 area cap and cover by conducting regular periodic inspections (twice per year), making timely repairs if needed, and maintaining a record of

such inspection and maintenance.

Characterize and properly dispose off-site all excavated material from [the entire Facility or where any contaminants remain in subsurface soils above EPA's Screening levels for non-residential use above CAOs?]

If excavation at the OCP Area is to be deeper than 12 feet, maintain appropriate worker safety and proper material handling.

Notify EPA prior excavation deeper than 12 feet in the OCP Area.

Groundwater

EPA's proposed remedy are institutional controls for groundwater including compliance with and maintenance of groundwater use restrictions that restrict groundwater use to non-potable and non-agricultural uses at the Facility in order to prevent exposure to contaminants while levels remain above MCLs.

Vapor Intrusion

EPA's proposed remedy is for the installation of an EPA approved vapor intrusion control system shall be installed in each newly occupied structure constructed and operated unless or until it is demonstrated to EPA that vapor intrusion of contaminants does not pose a threat to human health and EPA provides prior written approval that vapor mitigation is no longer required.

Implementation

In order to implement the components of the proposed final remedy for the Facility, as described above, EPA proposes to require the following land and groundwater use restrictions at the Facility:

1. The integrity of the RA-1 area cap and covers shall be maintained by conducting regular periodic inspections (twice per year), making timely repairs if needed, and maintaining a record of such inspection and maintenance.
2. Groundwater at the Facility shall not be used for any purpose other than the operation, maintenance, and monitoring activities required by MDE in consultation with EPA, unless it is demonstrated to MDE in consultation with EPA that such use will not pose a threat to human health or the environment or adversely affect or interfere with the Final Remedy and the current property owner obtains prior written approval from MDE in consultation with EPA such use.
3. Soil Excavation and Disposal – Any excavated material must properly characterized and transported off-site.
4. Excavation at the OCP Area – No excavation deeper than 12 feet in the OCP Areas shall be conducted unless MDE in consultation with EPA are given at least 30 days prior written approval. All appropriate worker safety and proper material handling

requirements, sufficient to comply with all applicable OSHA requirements and meet EPA's acceptable risk, shall be maintained.

5. An EPA approved vapor intrusion control system shall be installed in each newly occupied structure constructed and operated unless or until it is demonstrated to EPA and MDE that vapor intrusion of contaminants does not pose a threat to human health and EPA and MDE provides prior written approval that vapor mitigation is no longer required.

6. The Facility shall not be used for unrestricted residential use (Maryland Tier 1A) or as an unrestricted public recreational area (Maryland Level 1 and 2) it is demonstrated to EPA and MDE that such use does not pose a threat to human health and EPA and MDE provide prior written approval for such use.

EPA has determined that the above land and groundwater use restrictions, if maintained, have been satisfactorily implemented at the Facility through the Environmental Covenant recorded on the land records for the Facility property by MDE on February 8th, 2017.

Section 6: Environmental Indicators

EPA set national goals to measure progress toward meeting the nation's environmental goals for facilities. Under EPA's Corrective Action Program, EPA evaluates two key environmental indicators for each facility: (1) current human exposures under control and (2) migration of contaminated groundwater under control. EPA determined that the Facility met the current human exposures under control indicator and migration of contaminated groundwater under control indicators, signed on February 20, 2013.

Section 7: Financial assurance

The cost of the proposed remedy to the Facility owner is negligible therefore no financial assurance is required.

Section 8: Evaluation of Proposed Remedy

1. Protect human health and the environment	EPA's proposed remedy for the Facility protects human health from exposure, including future exposure, to soil and groundwater contamination. A concrete cap has been placed at RA-1, which is protective of human health, and the OCP area has been remediated to the maximum extent practicable. Because contaminants will remain in the soil and groundwater at levels inappropriate for residential use, EPA's Proposed Remedy requires land and groundwater use restrictions that will prohibit future uses that would pose an unacceptable risk.
2. Achieve media cleanup	EPA's proposed remedy meets the media cleanup objectives based on assumptions regarding current and reasonably anticipated future land and water resource use(s). The

objectives	remedy proposed in this SB is based on the current and future anticipated land use at the Site for commercial or industrial purposes. The COCs and corresponding EC already meet the soil cleanup objective. EPA's proposed remedy also requires the implementation and maintenance of land and groundwater use restrictions.
3. Remediating the Source of Releases	In the proposed remedy, 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. Since there are no sources of releases at the site, EPA has determined that this criterion has been met.
4. Long-term effectiveness	The proposed remedy of will maintain protection of human health and the environment over time by controlling exposure to the hazardous constituents remaining in soils and groundwater. The long-term effectiveness is high, as ICs have already been implementable and are required to be maintained. In addition, the cap at RA-1 must be maintained and inspected twice annually, effectively eliminating the potential for unacceptable risk over the long term.
5. Reduction of toxicity, mobility, or volume of the Hazardous Constituents	This proposed remedy does not require further source reduction. Maintenance of the RA-1 cap will reduce the mobility of and the exposure to the hazardous constituents in the soil. In addition, if excavation occurs deeper than 12 feet in the OCP Area, appropriate worker safety, material handling, and MDE notifications must occur.
6. Short-term effectiveness	EPA's proposed remedy takes into consideration future activities, such as construction or excavation that would pose short-term risks to workers, and the environment by requiring the current owners to implement and adhere to land and groundwater use restrictions.
7. Implementability	EPA's proposed remedy has already been implemented. EPA proposes to support the COC and Environmental Covenant MDE has already put in place.
8. Cost	EPA's proposed remedy is cost effective. There is no further cost to the owner unless the site is developed in the future.
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	MDE has reviewed and concurred with the proposed remedy for the Facility.

Section 9: Public Participation

Before EPA makes a final decision on the proposed remedy, the public may participate in the decision 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. AR documents are available for public review during normal business hours at:

U.S. EPA Region III
1650 Arch Street (3LC10)
Philadelphia, PA 19103
Contact: Caitlin Elverson
Phone: (215) 814-5455
Fax: (215) 814-3113
Email: elverson.caitlin@epa.gov

The public comment period will last thirty (30) calendar days from the date that the notice is published in a local newspaper. You may submit comments by mail, fax, or e-mail to Ms. Caitlin

Elverson. EPA will hold a public meeting to discuss this proposed remedy upon request. Public meeting requests should be made to Ms. Elverson.

EPA will respond to all relevant comments received during the comment period. If EPA determines that new information warrants a modification to the proposed remedy, EPA will modify the proposed remedy or select an alternative based on the new information and/or public comments. EPA will announce its final remedy and rationale for any changes in a document entitled the Final Decision and Response to Comments (FDRTC). All persons who comment on this proposed remedy will receive a copy of the FDRTC. Others may obtain a copy by contacting Ms. Caitlin Elverson at the address listed above.

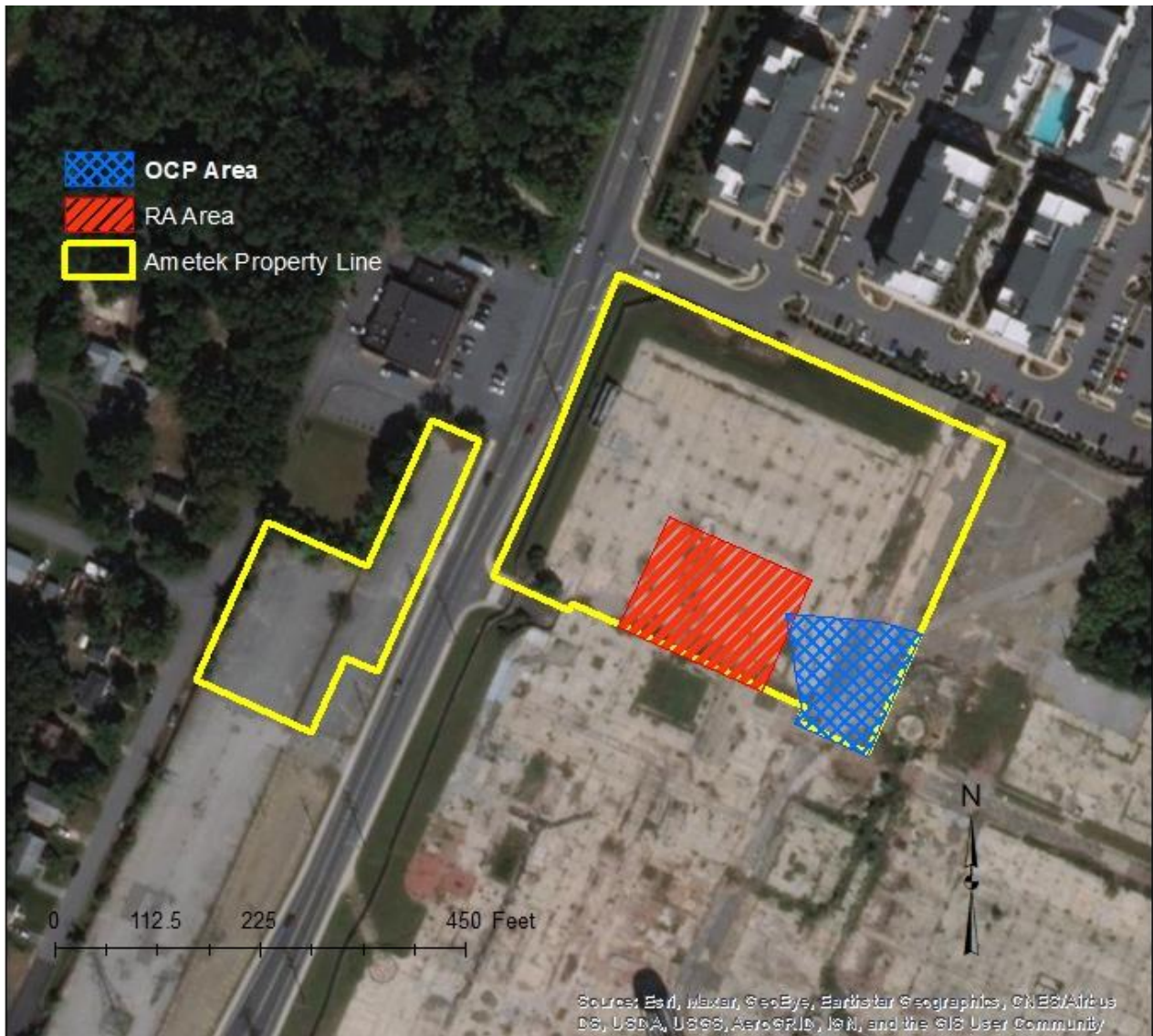
Section 10: Signature

Stacie Driscoll

Date: 2/1/2021

Stacie Driscoll, Acting Director
Land, Chemicals, and Redevelopment Division
US EPA, Region III

Figure 1



Attachment 1

Index to Administrative Record

2007, November 1, 2007; *Facts about IEI Property Voluntary Cleanup Program*, Maryland Department of the Environment.

2013, February 20; *Environmental Indicators for Current Human Exposures Under Control and Migration of Contaminated Groundwater Under Control*, EPA.

2013, February 26; *Environmental Indicators for Migration of Contaminated Groundwater Under Control*, EPA.

2016, November 1; *Former IEI Property Environmental Covenant Certificate of Completion*, Maryland Department of the Environment Land Management Administration Voluntary Cleanup Program.

2017, May 8; *Quarterly Hydrocarbon Recover Effort and Monitoring Report*, AECOM.

2019, December 24; *Revised Environmental Management Plan, Academy Yard Future Phases*, Geo Technology Associates, Inc. for Maryland Department of the Environment Land Restoration Program.