

**Long Term Stewardship Assessment
Arkema, Inc.
EPA ID PAD042259374**

A. In-office review of:

- 1) Engineering and Institutional Controls (ECs/ICs) documents and location maps:

Project Manager (Kevin Bilash) has pdf versions of the Uniform Environmental covenant (UEC) document (including associated location map) on internal hard drive and in file room located at the EPA Region 3 Office in Philadelphia, PA. The UEC is not currently listed on the PA activity and use limitations database located here: <http://www.depgis.state.pa.us/pa-aul/> Additionally, the UEC is not currently posted on EPA's Mid-Atlantic Corrective Action webpage under the specific facility here: <http://www.epa.gov/reg3wcmd/correctiveaction.htm> Both should be corrected by the PM.

- 2) Facility Contact:

The visit was planned for November 12th with the Arkema contact. The contact has changed recently due to recent personnel changes. New contact is Ken Sweeney and Doug Quimby (ken.sweeney@sartomer.com and doug.quimby@sartomer.com). A site visit was scheduled due to a late submittal of the most recent groundwater monitoring results as a result of this personnel change as well as to explain the long term stewardship initiative.

B. Facility visit:

**Attendees: Kevin Bilash – EPA
Ken Sweeney, Doug Quimby – Sartomer USA, LLC
Robert Wright, Glenn Tashjian – Arkema, Inc.**

- (a) Compare EC/IC maps for accuracy/consistency:

Both EPA and the facility are working from the same UEC and GW monitoring maps, therefore they are accurate and consistent. No changes were identified during a Facility site walk that trigger UEC requirements (no GW use, no soil disturbance, no changes in use).

- (b) Discuss any EC/IC and/or remediation units regarding updates or info. not conveyed in reports to EPA and any plans for land use, construction or sale of restricted use land:

Arkema informed EPA that a merger/sale occurred sometime in late 2013 or early 2014 between Arkema Inc. and Sartomer USA, LLC. RCRAInfo was searched during the meeting and the name has been updated in the database. EPA will make the updated changes to the Mid-Atlantic Corrective Action webpage.

Arkema inquired as to whether or not the existing thermal oxidizer and groundwater pump & treat equipment could be eliminated to use the space for other facility uses. EPA will review the Final Decision (FD) and Statement of Basis (SB) to respond to this request.

(c) Discuss how restricted areas and restrictions are communicated to staff, contractors, upper management, local planners/gov't as applicable:

Appropriate Arkema contacts are aware of requirements and there is a copy of the UEC on site. Any communication will be handled as needed.

(d) Discuss any issues identified under A., above:

The facility confirmed that electronic submission of the Groundwater monitoring results is acceptable and that the next sampling event is scheduled for June 2015 and results will be submitted around July 2015.

(e) Discuss any recommendations if they arise:

A discussion arose as to whether or not Arkema could abandon monitoring, recovery, and observation wells that are not currently required to be maintained as part of the MNA Remedy monitoring because they restrict facility access in some areas. EPA informed Arkema that as long as the well is not required to be maintained under the FD, then proper closure and abandonment is recommended. The PM will review the SB and FD to determine if there are any requirements related to this other than the Monitored Natural Attenuation (MNA) requirements and inform Arkema of the results. As discussed, proper well abandonment and notification procedures per the PA regulations should be followed if well closure were to occur.

C. Return to Office:

Document the Review in Memo/Report to Files:

Upon return to the office, this long term stewardship assessment was completed. The PM contacted the state to proceed with adding the UEC to the PA activity and use limitations database. The PM will also update the fact sheet to list the name of the Facility as Arkema, Inc. and uploaded a copy of the UEC.

EPA reviewed the FD and SB to respond to Arkema's request to eliminate the existing thermal oxidizer and groundwater pump & treat equipment to use the space for other Facility uses. There is no requirement for Arkema to maintain the equipment mentioned in the FD or SB therefore, Arkema may eliminate the equipment. The understanding as discussed during the Facility visit is that if the current MNA Remedy is no longer accomplishing the goal of concentration reduction and plume maintenance within the Facility boundary that a more current remedial approach would most likely be used (i.e. in situ injection).