



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

SUBJECT: Sherwin-Williams Company **DATE:** 10/01/2021
2325 Hollins Ferry Road Baltimore, Maryland 21230
EPA ID: MDD000215160

Long-term Stewardship Assessment

FROM: Priscilla Ortiz Carrero, Project Manager (3LD20)

TO: Long Term Stewardship File for Sherwin-Williams Company
RCRA Corrective Action Branch 2 (3LD20)

Remedy Review Summary:

EPA's Final Decision and Response to Comments (FDRTC) dated March 2015 requires Sherwin-Williams Company, located at 2325 Hollins Ferry Road Baltimore, Maryland 21230 (Facility), to implement the final remedy selected in the FDRTC which includes groundwater monitored natural attenuation, groundwater use restrictions, and implementation of vapor intrusion control system. The FDRTC also states that the Facility must follow compliance with and maintenance of an EPA approved groundwater monitoring plan and land and groundwater use restrictions.

Document Review:

The most recent satellite aerial image of the facility 2020 (Google Maps 2021) shows that property use has not changed since the FDRTC or recording of the environmental covenant. The corrective action objectives for groundwater are to return it to its maximum beneficial use within a timeframe that is reasonable given the circumstances of the project. Reasonable exposure from the Facility groundwater is via inhalation to construction workers which EPA's Corrective Action Objectives is to meet the EPA-approved RAOs developed to prevent a site-specific construction worker inhaling volatiles during deep trench excavation.

The Facility consists of two primary source areas: 100/500 Area and 700 Area. Regarding 100/500 Area, UST's and contaminated soil were extracted. In addition, a multiphase extraction system was installed and operated from October 1997 through December 2003 to remediate the shallow aquifer. In December 2003 the extraction system was shut down because removal of contaminants was asymptotic. The groundwater monitoring after the shutdown has shown contaminant stability and no indications of significant contaminant rebound. The 700 Area was impacted primarily with petroleum hydrocarbons, including toluene, ethylbenzene, xylenes, 1,3,5-trimethylbenzene and 1,2,4-trimethylbenzene.

A toluene plume is found in 100/500 Area but reports from 2008 indicated that toluene and other comingled organic compounds are becoming fully dissipated or attenuated (groundwater contaminants are below MCLs. Also, groundwater monitoring data collected through 2014 have shown that the groundwater plumes are stable and are not extending beyond the downgradient Facility property at levels above MCLs or Tap Water RSLs.

A comprehensive soil gas sampling/analytical program in February and April 2003 confirmed that an UST was the source of dissolved toluene in the 100/500 Area alluvium groundwater. 700 Area was found with petroleum hydrocarbons and chlorinated volatiles in soil gas. In 100/500 Area 1,2,4-trimethylbenzene and 1,3,5 trimethylbenzene were detected. Soil sampling was also collected with several contaminants detected above the RSLs for industrial soils.

Background:

The Sherwin-Williams Company facility is a 23-acre parcel in the City of Baltimore, Maryland, used since the 1940s to manufacture consumer and industrial products, primarily paints and other coatings. Prior to acquisition of the plant by The Sherwin-Williams Company in 1980, the plant was operated by the Artra Group, Inc. and by Baltimore Paint and Chemical Company. The plant is bounded on two sides by railroad tracks and industrial/commercial areas. Low-rise multifamily housing and Hollins Ferry Road border the property to the southeast and southwest. The parcel is fully developed, and the plant is typically active around the clock. Engineered features of the property include building structures and process areas, indoor and outdoor raw materials above-ground storage tanks (ASTs), solvent separator tanks, rail car and tank wagon unloading/loading areas, and above-grade process piping lines. The plant is serviced by railcar and truck traffic although access is restricted by site security including an eight-foot fence topped with both razor and barbed wire and a 24-hour security force.

Multiple environmental investigations and remedial actions have been completed at the Facility since its acquisition from the Baltimore Paint and Chemical Company (Baltimore Paint). Multiple environmental investigations and remedial actions have been completed at the Facility since 1980. Many of these environmental actions were taken in response to conditions that were discovered during the removal of historical Underground Storage Tanks (USTs). Most significantly among these was the discovery of contamination during the April 18, 1986, removal of Baltimore Paint's TCA UST. The removal of the TCA UST led to early site investigation and subsequent remediation at the Facility. That work was completed pursuant to a Administrative Consent Order (C0-87-1 02), dated May 8, 1997, between Sherwin Williams and the Maryland Department of the Environment (MDE). MDE provided regulatory oversight of the site investigation and remediation until March 17, 2005, when Sherwin-Williams entered into a Facility Lead Agreement (FLA) with EPA for the performance of a Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI) and Corrective Measures Study (CMS). EPA identified fourteen (14) potential Solid Waste Management Units (SWMUs) and Areas of Concern (AOC) for investigation. RCRA investigations and Corrective Action activities have since been conducted under the Facility Lead Agreement.

Documents Reviewed:

Statement of Basis dated January 2015
FDRTC dated March 2015
Environmental Covenant dated July 2015
Geospatial PDF Site Map



Institutional Control/Engineering Control
 Corrective Action Remedy Summary

Facility Name	Sherwin-Williams Company			
Address	2325 Hollins Ferry Road Baltimore, Maryland 21230			
EPA ID Number	MDD000215160			
Are there restrictions or controls that address:	Yes	No	Area(s)	Description of restrictions, controls and mechanism
Groundwater Use	X		Entire Facility	Groundwater at the Facility shall not be used for any purpose other than the operation, maintenance, and monitoring activities currently being conducted by the Facility and required by EPA, unless it is demonstrated to 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 Facility obtains prior written approval from EPA for such use.
Residential Use	X		Restricted Areas	Areas shall be restricted to commercial and/or industrial purposes and shall not be used for residential purposes unless it is demonstrated to EPA that such use will not pose a threat to human health or the environment or adversely affect or interfere with the selected remedy and the Facility provides prior written approval from EPA for such use.
Excavation	X		Restricted Areas	Prior to any earth moving activities, including excavation, drilling and construction activities, in the areas at the Facility where any contaminants remain in soils above EPA's Screening levels for non-residential use or groundwater above RAOs, shall be conducted in accordance with a Soils Management Plan which shall be developed and submitted to EPA for review and approval.
Vapor Intrusion	X		Restricted Areas	Installation of a vapor intrusion control system in new structures constructed above the contaminated groundwater plume or within 100-feet of the perimeter of the contaminated groundwater plume.
Capped Area(s)		X		
Other Engineering Controls		X		
Other Restrictions	X		Entire Facility	No new wells shall be installed on Facility property unless it is demonstrated to EPA that such wells are necessary to implement the final remedy and the Facility obtains prior written approval from EPA to install such wells.