DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION Interim Final 2/5/99 RCRA Corrective Action Environmental Indicator (EI) RCRIS code (CA750) Migration of Contaminated Groundwater Under Control

Facility Name: Former Ametek Inc. – Specialty Filaments Division Facility Address: 8335 Telegraph Road, Odenton, MD Facility EPA ID #: MDD 082612110

- 1. Has all available relevant/significant information on known and reasonably suspected releases to the groundwater media, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units (SWMU), Regulated Units (RU), and Areas of Concern (AOC)), been **considered** in this EI determination?
 - If yes check here and continue with #2 below.
 - If no re-evaluate existing data, or
 - if data are not available, skip to #8 and enter "IN" (more information needed) status code.

BACKGROUND

The 4.63-acre formerly closed Ametek, Inc. (Ametek) facility is located in a mixed residential, industrial, and commercial area on Telegraph Road. The original site consisted of a main warehouse building and paved parking/driveway areas on the eastern side of Telegraph Road and a small asphalt parking area (.927 acres of the 4.63 acre site) on the western side of Telegraph Road. The nearest homes are located approximately ½ mile southwest of the facility. I-295 and I-95 are located 5 and 10 miles west of the site.

In the late 1940s, the National Plastic Products Company (formerly Synthetic Products Corporation, Exxon related entity) constructed a building on the eastern portion of the property. This part of the property was formerly a wooded area with railroad spurs leading to the railcar repair facility located on the adjacent Nevamar property. In 1971, Amtech, Inc. purchased the facility from the Enjay Chemical Company (formerly National Plastic Products Company). In 1977, Ametek, acquired Amtech, Inc. through corporate merging; the facility then became Ketema in 1988 through corporate restructuring. In 1996, Specialty Filaments, Inc. acquired the Ketema Corporation Facility. As a result, the name of the facility was changed to Specialty Filaments Incorporated (SFI) (Odenton Plant). SFI ceased manufacturing operations in 2001 and the building's contents were removed. In 2001, the SFI property was purchased by RSN Holdings, LLC. The existing warehouse building was sold to Intercontinental Export Import, Inc. (IEI), and was used for storage of plastic pellets and recyclable plastic products. Prior to IEI's ownership, historically, the building manufacturing operations involved extruding plastic to form thin strands/fibers/threads for such commodities as fishing line, brushes, doll hair; and the use and storage of various chemicals including pigments, colorants, and oils. The building was purchased in 2008 by StonebridgeCarras LLC (StonebridegeCarras), and is being considered for new development. StonebridgeCarras changed the ownership name of the property as S/C Odenton II, LLC.

Fill material containing coal slag/dust generated from the on-site coal-fired boilers was used as fill beneath structures and parking areas during the expansion of the buildings over the manufacturing operating history, resulting in concentrations of lead, arsenic, and mercury concentrations above MDE Non-Residential Cleanup Standards (NRCS)/Anticipated Typical Concentration (ATC) and/or EPA Regional Screening Level (RSL) in the surface and subsurface soil and naphthalene above MDE Groundwater Cleanup Standards (GWCS/GCS) in the shallow aquifer.

An underground diesel release occurred on the neighboring International Paper facility, (northeast of the facility), which resulted in petroleum-impacted soil and groundwater with light non-aqueous phase liquid (LNAPL) and slight historical exceedences of benzene and naphthalene in the shallow aquifer above MCLs and/or GWCS that has partially migrated onto the Ametek site. This contamination is being remediated by International Paper under the MDE Oil Cleanup Program (OCP) Corrective Action Plan (CAP). Under the CAP, a remediation system was installed in the 1990s. The system is designed to remove LNAPL from groundwater using skimmer pumps and a soil vapor extraction system to remove residual soil contamination. Operation of the remediation systems ceased in November 2011, when it appeared that the site

remediation operations were not an efficient approach, as approved by MDE OCP. Bimonthly gauging and semiannual monitoring of all wells is being conducted to evaluate to assess the recharge and mobility of LNAPL and whether the recovery system should be reactivated.

In October 2006, concurrent with the environmental evaluations and related discussions regarding the adjoining Nevamar facility, discussions were held with MDE officials to submit an application for the subject property to the Voluntary Cleanup Program (VCP) under StonebridgeCarras' ownership. After the initial Phase I and II Environmental Site Assessment (ESA) activities in late 2006 and early 2007, S/C Odenton II, LLC applied to the MDE VCP on May 30, 2007 as an "Inculpable Person" (IP) for the site. The MDE VCP application included the Phase I and II ESA and previous environmental reports. The MDE acknowledged S/C Odenton II, LLC as an Inculpable Person in a June 13, 2007 letter. The site was accepted into the MDE VCP 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 S/C Odenton II. The MDE VCP approved the RAP on June 23, 2010. The RAP identifies three main areas of concern (AOC) associated with the Ametek site and proposed recommendations for demolition for future redevelopment of the site. Three AOCs were identified were the Remedial Area 1 (RA-1) where soil with elevated levels of metals due to coal slag/dust fill material were identified below the slab, Remedial Area 2 (RA-2) where subslab vapor were identified, and OCP CAP related petroleum release contamination Area where subsurface petroleum impacts. (See Figure 1)

In March 2012 the warehouse building roof and side walls were demolished. The slab floor remains and was filled with soil in the fall 2012. On June 29, 2012, a certification statement was submitted from a licensed plumber stating that connections to any potential water source supplied from groundwater were severed. In addition, the certification states that the two water supply wells to the warehouse building were capped and abandoned in July 2008 and that there aren't any other connections at the site. See Attachment 1

References:

1. Response Action Plan Former IEI Property, Second Revision April 22, 1010, Geo-Technology Associates, Inc. 2. Quarterly Hydrocarbon Recovery System Update Report, Former Nevamar – Decorative Products Facility, July –

September 2012

3. Phase I and II Environmental Site Assessment Intercontinental Export Import, Inc., May 2007, Geo-Technology Associates, Inc.

4. Plumber's Certification: June 29, 2012 Letter, addressed to Ms. Barbara Brown, MDE Voluntary Cleanup Program from Mr. Robert Williams, Licensed Plumber, Welch & Rushe, Inc.

Definition of Environmental Indicators (for the RCRA Corrective Action)

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

Definition of "Migration of Contaminated Groundwater Under Control" EI

A positive "Migration of Contaminated Groundwater Under Control" EI determination ("YE" status code) indicates that the migration of "contaminated" groundwater has stabilized, and that monitoring will be conducted to confirm that contaminated groundwater remains within the original "area of contaminated groundwater" (for all groundwater "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

Relationship of EI to Final Remedies

While Final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993, (GPRA). The "Migration of Contaminated Groundwater Under Control" EI pertains ONLY to the physical migration (i.e., further spread) of contaminated ground water and contaminants within groundwater (e.g., non-aqueous phase liquids or NAPLs). Achieving this EI does not substitute for achieving other stabilization or final remedy requirements and

expectations associated with sources of contamination and the need to restore, wherever practicable, contaminated groundwater to be suitable for its designated current and future uses.

Duration / Applicability of EI Determinations

EI Determinations status codes should remain in RCRIS national database ONLY as long as they remain true (i.e., RCRIS status codes must be changed when the regulatory authorities become aware of contrary information).

- 2. Is groundwater known or reasonably suspected to be "contaminated"¹ above appropriately protective "levels" (i.e., applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action, anywhere at, or from, the facility?
 - If yes continue after identifying key contaminants, citing appropriate "levels," and referencing supporting documentation.
 - If no skip to #8 and enter "YE" status code, after citing appropriate "levels," and referencing supporting documentation to demonstrate that groundwater is not "contaminated."
- If unknown skip to #8 and enter "IN" status code.

Rationale and Reference(s):

Rationale:

The shallow groundwater has been reported at depths of approximately 15 to 20 feet below ground surface during previous investigations and the ongoing diesel remediation activities under the OCP CAP. Under the OCP CAP three monitoring/recovery* wells (MW-1, MW-7*, and MW-14) were installed; aligning the southern boundary of the Ametek Facility. As part of the International Paper facility monitoring and remediation system under the MDE OCP, these monitoring/recovery wells were installed for the remediation of the UST diesel release at the International Paper facility under the MDE OCP. Of the constituents analyzed for under the OCP CAP naphthalene and benzene have been detected slightly above EPA Maximum Contaminant Levels and/or MDE GWCS/GCS (type I and II aquifer), all other constituents were either detected below MCLs and MDE GWCS/GCS or not sampled because LNAPL or product (MW-7) was detected. The concentrations were screened against MDE Type I and II Aquifer GWCS and/or EPA MCLs. However, the shallow aquifer doesn't meet the definition of a MDE Type I and II Aquifer due to low yield and turbidity, therefore remediation of the groundwater will be addressed only under the MDE OCP and not the EPA RCRA Corrective Action which requires the remediation of Type I and II aquifers to beneficial use in a reasonable time frame. See Table 1 and 2 and Figure 1. Additionally, the parking lot area located across Telegraph Road was sampled without any contamination detected.

Upon redevelopment of the site under the present ownership, MDE OCP CAP requires a risk evaluation to determine the required mitigation technology to continue to treat and contain the contamination and mitigate any risks.

References:

1. Response Action Plan Former IEI Property, Second Revision April 22, 1010, Geo-Technology Associates, Inc.

2. Quarterly Hydrocarbon Recovery System Update Report, Former Nevamar – Decorative Products Facility, July – September 2012

3. Phase I and II Environmental Site Assessment Intercontinental Export Import, Inc., May 2007, Geo-Technology Associates, Inc.

4. Plumber's Certification: June 29, 2012 Letter, addressed to Ms. Barbara Brown, MDE Voluntary Cleanup Program from Mr. Robert Williams, Licensed Plumber, Welch & Rushe, Inc.

Footnotes:

"Contamination" and "contaminated" describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriate "levels" (appropriate for the protection of the groundwater resource and its beneficial uses).

- 3. Has the **migration** of contaminated groundwater **stabilized** (such that contaminated groundwater is expected to remain within "existing area of contaminated groundwater"² as defined by the monitoring locations designated at the time of this determination)?
 - If yes continue, after presenting or referencing the physical evidence (e.g., groundwater sampling/measurement/migration barrier data) and rationale why contaminated groundwater is expected to remain within the (horizontal or vertical) dimensions of the "existing area of groundwater contamination"₂).
 - If no (contaminated groundwater is observed or expected to migrate beyond the designated locations defining the "existing area of groundwater contamination"₂) skip to #8 and enter "NO" status code, after providing an explanation.
 - If unknown skip to #8 and enter "IN" status code.

Rationale and Reference(s):

Historical data shows that the contaminated groundwater has stabilized in the property boundary wells. Over the previous two semiannual monitoring events since the remediation systems have been shutdown, the benzene and naphthalene concentrations have decreased to non-detect or had LNAPL (therefore the wells were not sampled) in the property boundary monitoring wells. (See Tables 1 and 2) The LNAPL is manually skimmed as described in the background section of the EI. The next sampling event should take place in May 2013.

² "existing area of contaminated groundwater" is an area (with horizontal and vertical dimensions) that has been verifiably demonstrated to contain all relevant groundwater contamination for this determination, and is defined by designated (monitoring) locations proximate to the outer perimeter of "contamination" that can and will be sampled/tested in the future to physically verify that all "contaminated" groundwater remains within this area, and that the further migration of "contaminated" groundwater is not occurring. Reasonable allowances in the proximity of the monitoring locations are permissible to incorporate formal remedy decisions (i.e., including public participation) allowing a limited area for natural attenuation.

4. Does "contaminated" groundwater discharge into surface water bodies?



If yes - continue after identifying potentially affected surface water bodies.

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If no - skip to #7 (and enter a "YE" status code in #8, if #7 = yes) after providing an explanation and/or referencing documentation supporting that groundwater "contamination" does not enter surface water bodies.

If unknown - skip to #8 and enter "IN" status code.

Rationale and Reference(s):

Rationale:

A pond formerly used for cooling process water is located on the north and a storm water management pond is located south. These two ponds discharge to the Picture Spring Branch located directly adjacent to the property's eastern border.

Surface Water

In 2007 surface water samples were collected during the Phase I and II Environmental Site Assessment (ESA). The samples were collected from the isolated on-site portion of the smaller (southern pond, from Picture Spring Branch, and from the larger northern pond. The surface water sample results indicated arsenic and copper below GWCS/GCS values, and the remaining analytes were below the laboratory reporting limits. See table 1-4 in the Phase I and II ESA.

Sediment

Initially Arsenic was detected above MDE RSC, NRCS and ATC values in the sediment samples collected during the ESA (See Section 4.4. in the ESA) Additional samples were collected and showed that concentrations of arsenic were consistent with natural conditions, as documented in section 5.4 in the ESA.

References:

1. Phase I and II Environmental Site Assessment Intercontinental Export Import, Inc., May 2007, Geo-Technology Associates, Inc.

Is the **discharge** of "contaminated" groundwater into surface water likely to be "**insignificant**" (i.e., the maximum concentration³ of each contaminant discharging into surface water is less than 10 times their appropriate groundwater "level," and there are no other conditions (e.g., the nature, and number, of discharging contaminants, or environmental setting), which significantly increase the potential for unacceptable impacts to surface water, sediments, or eco-systems at these concentrations)?

If yes - skip to #7 (and enter "YE" status code in #8 if #7 = yes), after documenting: 1) the maximum known or reasonably suspected concentration³ of key contaminants discharged above their groundwater "level," the value of the appropriate "level(s)," and if there is evidence that the concentrations are increasing; and 2) provide a statement of professional judgement/explanation (or reference documentation) supporting that the discharge of groundwater contaminants into the surface water is not anticipated to have unacceptable impacts to the receiving surface water, sediments, or eco-system.

If no - (the discharge of "contaminated" groundwater into surface water is potentially significant) - continue after documenting: 1) the maximum known or reasonably suspected concentrations of each contaminant discharged above its groundwater "level," the value of the appropriate "level(s)," and if there is evidence that the concentrations are increasing; and 2) for any contaminants discharging into surface water in concentrations greater than 100 times their appropriate groundwater "levels," the estimated total amount (mass in kg/yr) of each of these contaminants that are being discharged (loaded) into the surface water body (at the time of the determination), and identify if there is evidence that the amount of discharging contaminants is increasing.

If unknown - enter "IN" status code in #8.

Rationale and Reference(s):

5.

³ As measured in groundwater prior to entry to the groundwater-surface water/sediment interaction (e.g., hyporheic) zone.

Can the **discharge** of "contaminated" groundwater into surface water be shown to be "**currently acceptable**" (i.e., not cause impacts to surface water, sediments or eco-systems that should not be allowed to continue until a final remedy decision can be made and implemented₄)?

If yes - continue after either: 1) identifying the Final Remedy decision incorporating these conditions, or other site-specific criteria (developed for the protection of the site's surface water, sediments, and eco-systems), and referencing supporting documentation demonstrating that these criteria are not exceeded by the discharging groundwater; OR

2) providing or referencing an interim-assessment₅, appropriate to the potential for impact that shows the discharge of groundwater contaminants into the surface water is (in the opinion of a trained specialists, including ecologist) adequately protective of receiving surface water, sediments, and eco-systems, until such time when a full assessment and final remedy decision can be made. Factors which should be considered in the interim-assessment (where appropriate to help identify the impact associated with discharging groundwater) include: surface water body size, flow, use/classification/habitats and contaminant loading limits, other sources of surface water/sediment contamination, surface water and sediment sample results and comparisons to available and appropriate surface water and sediment "levels," as well as any other factors, such as effects on ecological receptors (e.g., via bio-assays/benthic surveys or site-specific ecological Risk Assessments), that the overseeing regulatory agency would deem appropriate for making the EI determination.

If no - (the discharge of "contaminated" groundwater can not be shown to be "currently acceptable") - skip to #8 and enter "NO" status code, after documenting the currently unacceptable impacts to the surface water body, sediments, and/or eco-systems.

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If unknown - skip to 8 and enter "IN" status code.

Rationale and Reference(s):

⁴ Note, because areas of inflowing groundwater can be critical habitats (e.g., nurseries or thermal refugia) for many species, appropriate specialist (e.g., ecologist) should be included in management decisions that could eliminate these areas by significantly altering or reversing groundwater flow pathways near surface water bodies.

⁵ The understanding of the impacts of contaminated groundwater discharges into surface water bodies is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration to be reasonably certain that discharges are not causing currently unacceptable impacts to the surface waters, sediments or eco-systems.

7. Will groundwater **monitoring** / measurement data (and surface water/sediment/ecological data, as necessary) be collected in the future to verify that contaminated groundwater has remained within the horizontal (or vertical, as necessary) dimensions of the "existing area of contaminated groundwater?"

If yes - continue after providing or citing documentation for planned activities or future sampling/measurement events. Specifically identify the well/measurement locations which will be tested in the future to verify the expectation (identified in #3) that groundwater contamination will not be migrating horizontally (or vertically, as necessary) beyond the "existing area of groundwater contamination."

If no - enter "NO" status code in #8.

If unknown - enter "IN" status code in #8.

Rationale and Reference(s):

Under the MDE OCP CAP remediation program for the International Paper petroleum release semi-annual monitoring will conducted to investigate whether current trends in LNAPL accumulation continue and to actively monitor the LNAPL recharge and mobility. Gauging results will be documented and used to determine if system reactivation is necessary.

8. Check the appropriate RCRIS status codes for the Migration of Contaminated Groundwater Under Control EI (event code CA750), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (attach appropriate supporting documentation as well as a map of the facility).

YE - Yes, "Migration of Contaminated Groundwater Under Control" has been verified. Based on a review of the information contained in this EI determination, it has been determined that the "Migration of Contaminated Groundwater" is "Under Control" at the Former Ametek, Inc. - Specialty Filaments Division facility, EPA ID # MDD 082612110, located at 8335 Telegraph Road, Odenton, MD, Specifically, this determination indicates that the migration of "contaminated" groundwater is under control, and that monitoring will be conducted to confirm that contaminated groundwater remains within the "existing area of contaminated groundwater" This determination will be re-evaluated when the Agency becomes aware of significant changes at the facility.

NO - Unacceptable migration of contaminated groundwater is observed or expected.

IN - More information is needed to make a determination.

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Supervisor

(signature) (print) Luis Pizarro (title) Associate Director EPA Region III

(title) Remedial Project Manager

Date 2/20/13

Date 2/20/13

Locations where References may be found:

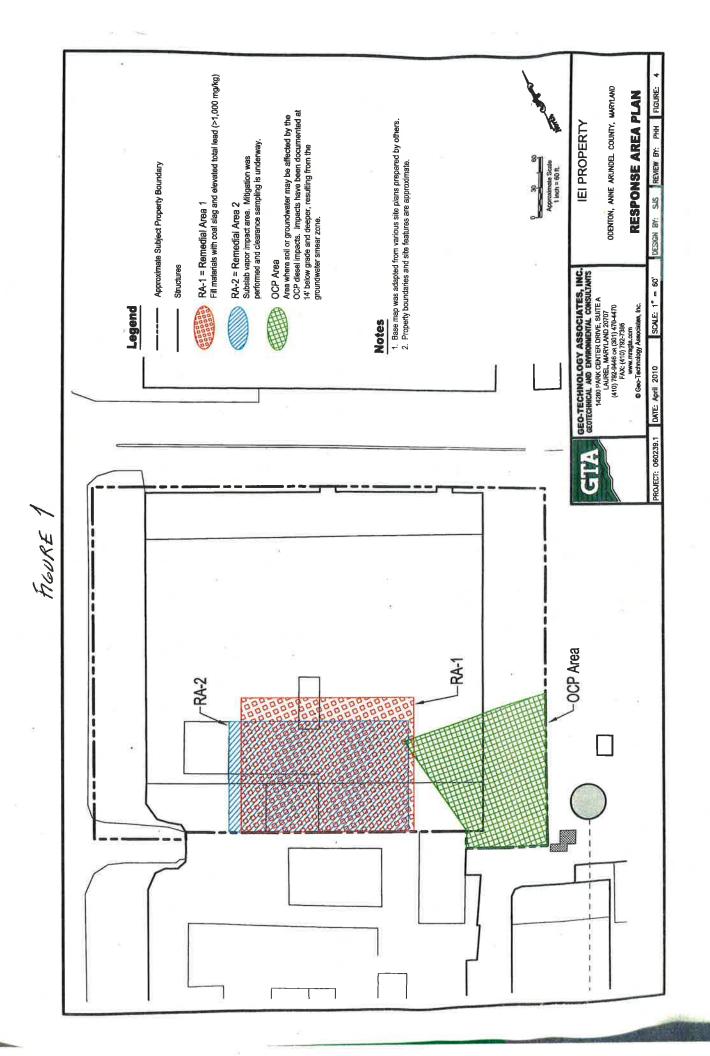
US EPA Region III Land and Chemicals Division 1650 Arch Street Philadelphia, PA 19103

Contact telephone and e-mail numbers

| (name) Lu | nda Holden | |
|-----------|----------------------|--|
| (phone #) | 215-814-3428 | |
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(signature)

(print) Linda Holden



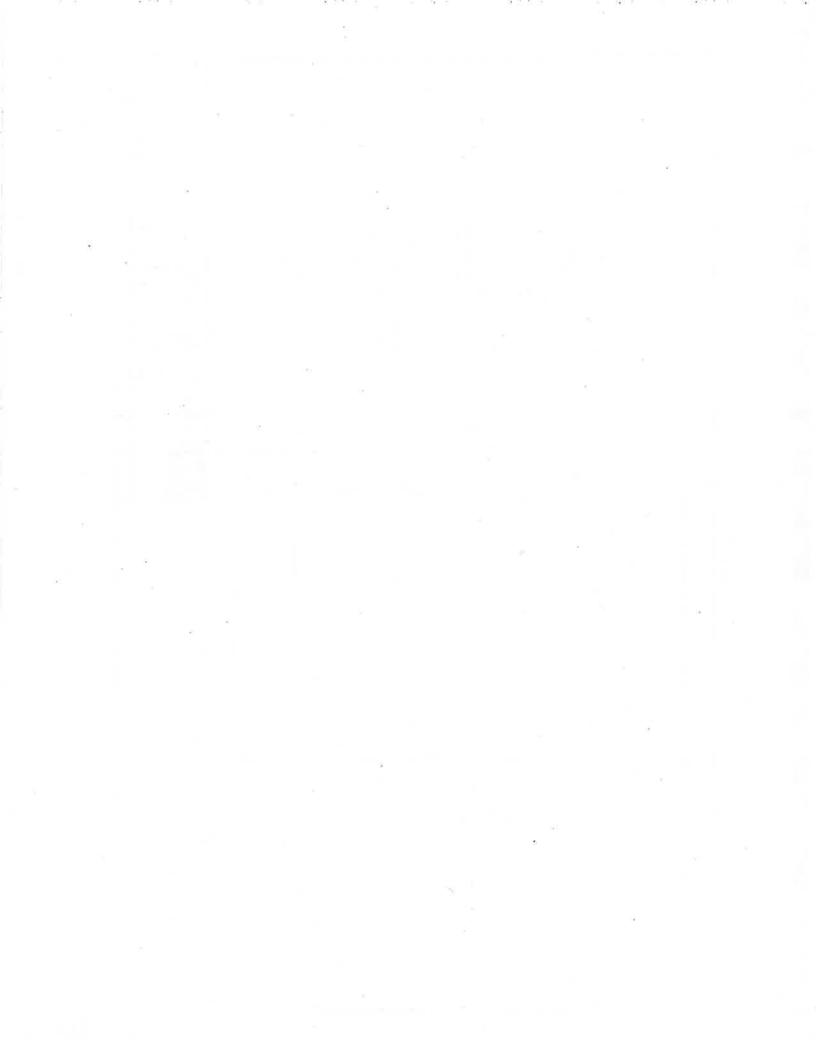


Table 1

Current Analytical Results of Monitored Contaminants in Groundwater under the MDE Oil Control Program (ug/L)

| Contaminant | MDE GWCS* | EPA MCLs* | MW-1 | MW- 7 | MW-14 |
|-----------------------------------|--------------|-----------|----------|----------|----------|
| Benzene | 5.0E+00 | 5.0E+00 | NS/LNAPL | NS/LNAPL | NS/LNAPL |
| Toluene | 1.0E+03 | 1.0E+03 | NS/LNAPL | NS/LNAPL | NS/LNAPL |
| Ethylbenzene | 7.0E+02 | 7.0E+02 | NS/LNAPL | NS/LNAPL | NS/LNAPL |
| Xylenes | 1.0E+04 | 1.0E+04 | NS/LNAPL | NS/LNAPL | NS/LNAPL |
| MTBE (Methyl Tert-Butyl Ether) | 2.0E+01 | | NS/LNAPL | NS/LNAPL | NS/LNAPL |
| Naphthalene | 6.5E-01 | | NS/LNAPL | NS/LNAPL | NS/LNAPL |
| Chlorobenzene | 1.0E+02 | 1.0E+02 | NS/LNAPL | NS/LNAPL | NS/LNAPL |
| 1,2-Dichlorobenzene | 6.0E+02 | 6.0E+02 | NS/LNAPL | NS/LNAPL | NS/LNAPL |
| Cis-1,2- Dichloroethene | 7.0E+01 | 7.0E+01 | NS/LNAPL | NS/LNAPL | NS/LNAPL |
| Isopropyl benzene (Cumene) | 6.6E+01 | | NS/LNAPL | NS/LNAPL | NS/LNAPL |
| Tetrachloroethene | 5.0E+00 | 5.0E+00 | NS/LNAPL | NS/LNAPL | NS/LNAPL |

MDE GWCS/MCS - Maryland Department of Environment Groundwater Cleanup Standards

EPA MCls – Environmental Protection Agency Maximum Contaminant Levels

*ug/L – Micrograms per Liter

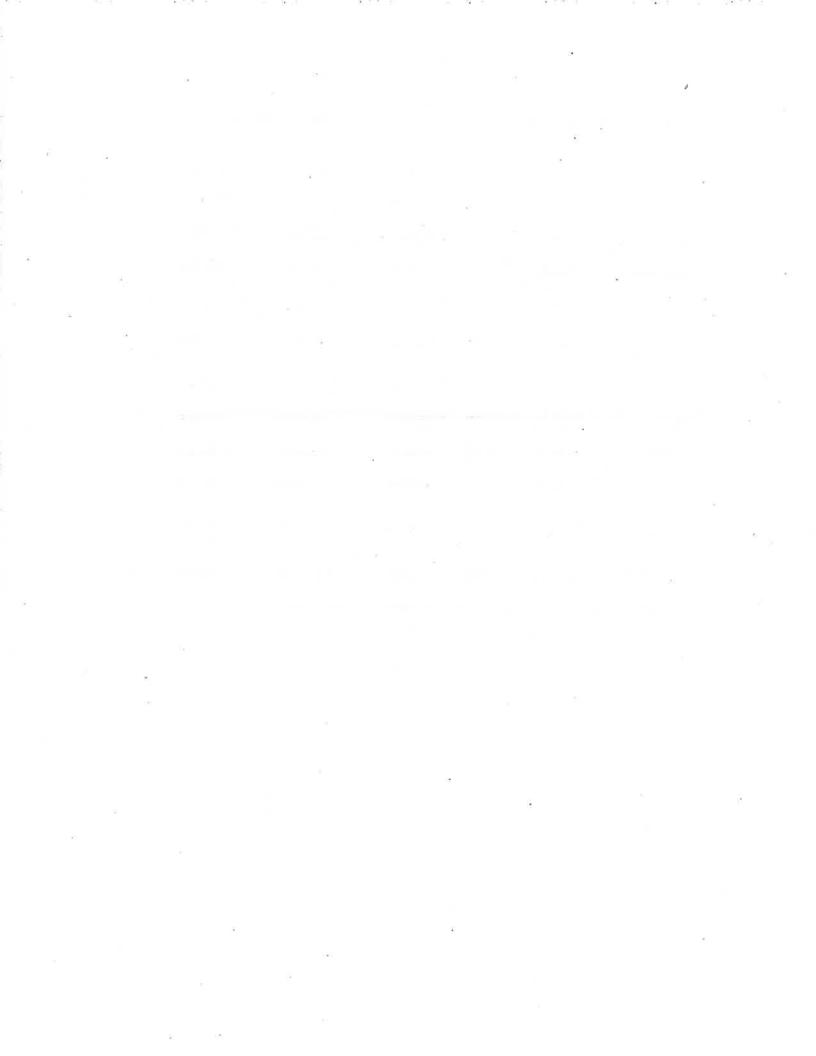


Table 2Highest Concentrations of ContaminantsDetected in Soil and Monitored Groundwater within the Facility Building

| Contaminant | MDE NRCS (mg/kg) | EPA RSL (mg/kg) | Maximum Soil Concentration (mg/kg) | MDE GWCS (ug/L) | EPA MCL (ug/L) | Maximum Groundwater Concentration (ug/L) |
|-------------|---------------------|--------------------|--|--------------------|-------------------|---|
| OCP Area | | | | | 1 | |
| Naphthalene | 2.0E+3 | 1.8E+01 | No exceedences | 6.5E-01 | 1.4E-01 | 40 |
| | | | | | | |
| RA-1 Area | | | | | | |
| Arsenic | 1.9+00 | 1.6E+00 | 25 | 1.0E+01 | 1.0E+01 | No Exceedences |
| Lead | 1.0E+3 | 8.0E+02 | 14,000 | 1.5E+01 | 1.5E+01 | No Exceedences |
| Mercury | 4.3E+01 | 6.0E+02 | 8.6 | 2.0E+00 | 2.0E+00 | No Exceedences |

MDE GWCS/MCS - Maryland Department of Environment Groundwater Clean up Standards

EPA RSL – Environmental Protection Agency Regional Screening Levels

EPA MCls – Environmental Protection Agency Maximum Contaminant Levels

mg/kg – Micrograms per Kilogram

ug/L - Micrograms per Liter



ATTACHMENT 1

VIA U.S. MAIL

Maryland Department of the Environment Voluntary Cleanup Program Attn: Ms. Barbara Brown 1800 Washington Boulevard, Suite 625 Baltimore, MD 21230

RE: Former IEI Property (8335 Telegraph Road, Odenton, MD 21113) Licensed Plumber statement that connections to any potential water source supplied from groundwater have been severed.

June 29, 2012

Dear Ms. Brown,

This letter will certify to Maryland Department of the Environment that, per our examination of the former IEI warehouse building site at 8335 Telegraph Road, Odenton, MD, it has been demolished down to the concrete building slab and all connections to any potential water source supplied from groundwater (i.e., piping from adjacent properties, wells, etc.) have been removed and/or severed.

As noted on the attached documents, the two wells previously supplying water to the building were capped and abandoned in July, 2008 and there are no other connections at the site.

Please contact me if you have any questions or comments at the referenced phone number / fax number.

Sincerely,

Noter 2 Elin

Licensed Plumber Welch & Rushe, Inc.

