

STATEMENT OF BASIS

Kelly Springfield Tire Company Site Cumberland, Maryland EPA ID NO. MDD033060217

I. Introduction

This Statement of Basis is for the Kelly Springfield Tire site (KST) in Cumberland, Maryland. After a site inspection of the facility and an evaluation of past environmental practices, the Environmental Protection Agency (EPA) recommends that no further corrective action, other than groundwater monitoring and assigning institutional controls, is necessary at the facility at this time. The purpose of this document is to solicit public comment on EPA's recommendation for this facility.

The facility had been designated a high priority facility in the Resource Conservation and Recovery Act (RCRA) corrective action program. For more information on the RCRA Corrective Action Program, visit the Region III web site at www.epa.gov/reg3wcmd/correctiveaction.htm. The corrective action program is designed to ensure that facilities have investigated and cleaned up any releases of hazardous waste or constituents that may have occurred at their property. Region III is using the administrative procedures found in 40 CFR Part 270 to solicit public comment prior to making its final corrective action decision for KST.

II. Proposed Corrective Measures

Institutional controls will be assigned to the property, limiting reuse of the property for industrial/commercial purposes only. In addition, EPA will require that a re-sampling of the groundwater be conducted in the future to confirm no adverse impacts to environmental quality are occurring.

III. Facility Background

The facility is located at 800 Kelly Road in Cumberland, Allegany County, Maryland. The facility was formerly occupied by Kelly Springfield Tire Company and consists of an approximately 82-acre parcel. Currently, the Board of County Commissioner (BCC) of Allegany County and the Allegany Department of Public Works use several of the buildings for non manufacturing purposes. The facility is located adjacent to the Potomac River. Groundwater recharge in this area occurs mainly through infiltration of precipitation. The sand and gravel layer at the facility is the upper most aquifer at the site. Groundwater flows towards the Potomac River, which borders the facility to the east. Based on the data available from monitoring wells

sampled in June 2003, groundwater is encountered from 12.5 to 22 feet.

Kelly Springfield operated a tire manufacturing plant at the site from 1921 to 1987. The major structures at the facility consisted of manufacturing buildings, tire assembly and curing facilities, office buildings, testing laboratories, and warehouses. The manufacturing and processing facilities have been demolished and removed.

Kelly Springfield purchased the property in 1917 and began rubber tire manufacturing operations in 1921. In 1941 and 1942, the facility was converted to produce 50-caliber shell cartridges for the U.S. Department of the Army. In 1945, tire-manufacturing operations resumed and continued until the Maryland Economic Development Corporation (MEDCO), Baltimore, Maryland, purchased the facility from Kelly Springfield in March 1987. On May 21, 1987, all manufacturing operations were discontinued. There was no activity on site from 1987 through 1990. On June 29, 1990, the BCC of Allegany County purchased the property from MEDCO.

The facility has been subdivided into lots suitable for building. The lots are to be sold for economic development of the area. New buildings have been erected, and some existing buildings have been refurbished for reuse on several of the lots. This process will continue until all available building lots are sold and redeveloped.

IV. Previous Investigations

The United States Army Corps of Engineers (COE), under contract to the EPA, initiated an Environmental Indicator Inspection in the spring of 2000. The COE performed an extensive record search at the EPA Region 3 office in Philadelphia, Pennsylvania; at the MEDCO offices in Baltimore, Maryland; and at the Maryland Department of Economic Development office in Cumberland, Maryland. The record searches included a review of available documents for RCRA permit applications, descriptions of historical spills and releases, and closure documents.

Based on the site visit and the file search, the COE concluded that a hazardous waste storage building and a waste oil/solvent tank at the site were decontaminated according to a state-approved facility closure plan during the plant closure activities. All asbestos and electrical equipment containing polychlorinated biphenyl (PCB) oils had been removed and disposed of off site. Eight underground storage tanks (UST) were removed between 1986 and 1987. All aboveground storage tanks had been cleaned and removed. On July 19, 1989, the Maryland Department of the Environment (MDE) issued a letter indicating that all closure activities had been in accordance with the facility closure plan. One remaining UST was removed in December 1990.

The COE also concluded that a licensed asbestos abatement firm removed all remaining or newly discovered asbestos as part of the demolition activities. The COE obtained copies of asbestos project notification forms that document the removal and disposal of asbestos-containing material such as window caulking, floor tiles, and roofing tar. According to the notification forms, the materials were removed before the buildings were demolished. The COE identified

four monitoring wells during their site visit. COE also reported that several site assessments and audits were performed at the KST site. A summary of the previous investigations that were discovered in the various agency files is provided below.

**Summary of Environmental Assessments
Former Kelly Springfield Tire Company
Cumberland, Maryland**

- **1987 - An Environmental Audit and Site Assessment of the Kelly Springfield Tire Co. Prepared for Maryland Economic Development Corporation, Baltimore, Maryland. Prepared by EA Engineering, Science, and Technology, Inc.**
- **1992 - Environmental Priorities Initiative Preliminary Assessment of the Kelly Springfield Tire Company Site. Prepared by Maryland Department of the Environment. Prepared for United States Environmental Protection Agency, Region III.**
- **1995 - Stabilization Initiative Inspection Report for the Kelly Springfield Tire Company. Prepared by A.T. Kearney, Inc., September, 1995.**
- **2001 - Environmental Indicator Inspection Report for the Former Kelly Springfield Tire Company Site. Prepared by the United States Army Corps of Engineers, Philadelphia District, March 2001.**

V. Summary of RCRA Facility Investigation

In order to determine if RCRA Corrective Action would be required at the facility, EPA tasked Tetra Tech, an EPA contractor, to conduct a multimedia sampling event at the site. Tetra Tech developed a sampling plan that included the collection of surface and subsurface soil samples, surface waters and sediments, and the installation of monitoring wells and the collection of groundwater samples.

Results of Soil Sampling

Phase I Soil Sampling, July 2002

A screening round of sampling was conducted in July 2002, and a second round of sampling was completed during June 2003. Soil samples were analyzed for Target Analyte List (TAL) metals and cyanide as well as Target Compound List (TCL) volatile organic compounds (VOC), semi-volatile organic compounds (SVOC), pesticides (Pest), and polychlorinated biphenyls (PCB). Tetra Tech evaluated and screened the soil in several areas for potential risks for exposures to industrial workers and construction workers at the former KST site. The current site has been subdivided into several parcels and the screening focused on the potential risks associated with these parcels. Additionally, some soil samples collected during the RCRA sampling events were

for the purpose of assessing former SWMU areas. A further objective of the screening process was to identify areas where additional sampling would help further delineate areas of potential risk.

For the Phase I Soil Screening conducted by Tetra Tech during July 2002, the Region III Risk-Based Concentration (RBC) tables were applied using concentrations for industrial soil. In addition, since the site may be subject to construction activities, Tetra Tech calculated RBCs for the construction workers using the soil ingestion assumptions found in recent EPA guidance (EPA 2001) of 330 milligrams per day (mg/day) compared to the 50 mg/day for the industrial worker. The soils data was evaluated in different approaches to address both the risks posed to the industrial worker and the risks posed to a construction worker. First surface soil data, samples taken from 0 to 2 feet below ground surface was compared to the screening factors. Since a worker will not be exposed to soil from just one location, if data were available an average concentration was calculated for each of these constituents. The other approach taken to evaluate the soils at the former KST site was to screen the soils to a depth of 10 feet below ground surface for potential exposure to construction workers. This evaluation focused on the undeveloped portion of the site, where the KST manufacturing buildings once stood, but have since been demolished. The analytical results from the soil samples collected during the July 2002 screening round of sampling, revealed contamination that fell within the EPA's "acceptable" risk range of 10^{-4} to 10^{-6} . However, because some samples contained constituents that exceeded their screening values additional samples were recommended to identify potential hot spots at the site and to better define potential risks at the site.

Phase II Soil Sampling, June 2003

A second round of sampling was conducted during June 2003. Additional soil samples were collected from three on-site areas based on the results from the July 2002 sampling. The soil samples were analyzed for the same constituents as in the Phase I sampling effort. The results of this sampling event were evaluated to characterize the risks and hazards associated with potential exposure to contaminants present in media at the site by current and future human receptors. Consistent with current and potential future use of the KST site, the most likely human receptors considered in this risk evaluation included industrial workers and construction workers. The total risks, for industrial workers, associated with the three areas targeted in the second round of sampling ranged from 10^{-5} to 3×10^{-5} . These risks fall within the "acceptable" range for carcinogenic risk established by EPA. Total risks for the construction worker were also evaluated. Analytical results from this sampling event indicated that one third of the sampling locations evaluated for risks to the construction worker had total risks of less than 10^{-6} . The remaining sampling locations have total risks that are within EPA's risk range and at or below a target risk of 10^{-5} .

Results of Groundwater Sampling

Phase I Groundwater Sampling, July 2002

Groundwater results from the July 2002 sampling event identified only one organic contaminant, benzene at 14 ug/l, at a concentration slightly above its drinking water limit (5ug/l). This sample was collected from a geoprobe location in the general vicinity where several underground storage tanks had been located during the operational days of KST. The sample location was greater than 300 feet from the property boundary, which is located near the Potomac River. Manganese (up to 7030 ug/l) was found in filtered ground water samples above the tap water RBC of 730 ug/l. During the initial groundwater sampling effort geoprobe techniques were used to collect the groundwater samples. Unfortunately, clay zones were encountered and adequate water quantity could not be collected at all locations using the geoprobe. Because groundwater samples could not be obtained from a particular down gradient section of the site perimeter, a decision was made to return and install some shallow monitoring wells so that the data gaps located on the eastern side of the facility could be addressed.

Phase II Groundwater Sampling, June 2003

Tetra Tech collected six additional groundwater samples from the site, including samples from two new monitoring wells located on the eastern perimeter, during the week of June 23, 2003. The analytical results from that sampling event revealed only manganese and lead, above their RBCs. The inorganic results for the June 2003 sampling effort were for total (unfiltered) metals. Lead was found at 21.1 ug/l and 32 ug/l in monitoring wells numbers five and six respectively. A bench mark of 15 ug/l of lead has been established by the EPA for water supply companies. Manganese was found up to 14,900 ug/l during the June 2003 sampling event. This manganese concentration was biased high based on the data validation report. The next highest unfiltered manganese result for this sampling was 8780 ug/l. However, the on-site groundwater is not used for potable purposes and therefore, these levels should pose no threat to human health based on current use conditions. Furthermore, site-adjacent sediment samples collected from the Potomac River during the July 2002 sampling event were at or below the background sample concentration for manganese and lead. This data indicates that the elevated inorganic concentrations found in on-site monitoring wells is not having an impact on the Potomac River. No organic compounds were identified in groundwater at concentrations above their respective maximum contaminant level (MCL) or risk based concentrations during the June, 2003 sampling event. Benzene, which was identified in the general vicinity of the former underground storage tank (UST) area at 14 ug/l during the July 2002 sampling effort was not identified in the groundwater collected from down gradient perimeter monitoring wells during either round of sampling conducted by EPA. Therefore, it appears that the benzene concentrations identified in the UST area are localized and are not migrating from the site. This reduction in benzene concentration should occur by natural attenuation as the groundwater moves through the soil.

Phase III Groundwater Sampling, May 2006

Because the results of the Corrective Action Investigation indicated a level of contamination that could require very little or no further action for the projected future use of the KST property, a final round of groundwater monitoring was completed. EPA tasked Tetra Tech to conduct a round of groundwater sampling at the KST property in the spring of 2006. Tetra Tech collected

groundwater samples from the monitoring wells at the site in May 2006. The samples were analyzed for volatile organic compounds and for filtered metals. No volatile organic contamination was identified in this round of groundwater sampling. Inorganic analyses of this round of groundwater samples was consistent with previous sampling events except for the presence of thallium in monitoring wells numbers one and six at 35.9 ug/l and 64.6 ug/l respectively. The MCL for thallium is 2 ug/l. Because thallium was not a contaminant of concern in soils and had not been identified at elevated levels in the previous rounds of groundwater sampling, it was assumed to be an anomaly caused by improper sample handling or a result of a laboratory artifact. To be certain that the thallium was not actually present in monitoring wells one or six, the wells were re-sampled on November 15, 2006 and the groundwater was once again analyzed for filtered metals. Results from this round of groundwater sampling indicated that thallium was not detected in any groundwater samples.

VI. Interim Measures/Remedial Action Taken at KST

Provided below is a description of the various Solid Waste Management Units (SWMUs) and /or Areas of Concern (AOCs) that were identified at the facility. Information regarding remedial activities at various units is also provided.

Former Solid Waste Management Units

- Oil Unloading Dock – Located east of Building 99. The dock measured 6’ high x 120’ long x 4’ wide. Railroad tracks that ran parallel to Building 99 would allow rail cars to pull up to the dock and unload oil. It is unknown as to when the unloading dock was put into service, however, operations of the unloading dock ceased in 1987. Contaminated soil in the area of the oil unloading dock was excavated and disposed at an off-site disposal facility during facility shut down.
- Process Oil Unloading Station – Located South of Building 99. The unloading station was an open unit with a roof. Release controls included a 20’ x 20’ concrete pad with an 8” concrete berm. It is unknown as to when the unloading station was put into service, however, operations ceased in 1987. Contaminated soil in the area of the Process Oil Unloading Station was excavated and disposed at an off-site disposal facility during facility shut down.
- Underground Solvent Storage Tanks – From the 1940’s, the facility utilized eight underground storage tanks used to hold the solvents used in the cement house. The underground storage tanks were located south of Building 99 and consisted of two 3,000 gallon, two 10,000 gallon and four 20,000 gallon capacities. The tanks were removed in 1986-1987 and the excavations were backfilled. Contaminated soils were disposed at an off-site facility.
- Waste Oil/Solvent Tank – Located on the eastside of Building 15 was a 12,000-gallon steel, horizontal, aboveground storage tank. The unit was used to accumulate waste

oil/solvents to be burned in Boilers 61 and 62. The waste oil/solvent tank was utilized from 1979 to 1988. Release controls for the tank included an earthen berm. Contaminated soils were excavated and disposed at an off-site facility during facility shut down.

- Nos. 2 & 6 Fuel Oil Unloading Station – Located south of Building 15. A concrete railcar-unloading pad was used as a release control. The concrete pad measured 12'x12' and sloped toward a blind sump. The concrete pad was constructed with a 8 inch concrete dike, also a release control. There were also associated pipes, pumps and ancillary equipment that were used to transfer the fuel from the rail cars to the appropriate storage tanks. Contaminated soils associated with the Fuel Oil Unloading Station were excavated and disposed at an off-site location during the facility shut down.
- Hazardous Waste Drum Storage Area – Located southeast of Buildings 99 and 42. The unit was used to house 55-gallon drums of hazardous waste awaiting disposal. The storage area contained a 16' x 20' corrugated metal structure on a 21' x 21' concrete pad that sloped towards a blind sump. The concrete pad was surrounded by a 6" high concrete berm. The storage area was used between 1979 and 1986. There have been historical releases reported for the hazardous waste drum storage area. Contaminated soil associated with the drum storage area was excavated during closure and disposed at an off-site facility.
- Former Gasoline Underground Storage Tank (UST) – Subsequent to facility closure, in December, 1990 a 4,000 gallon UST used to contain gasoline was removed from the property. Upon excavation and removal, it was determined that the tank had been leaking. Approximately three tons of contaminated soil were removed from the excavation and disposed at the Allegany County Landfill. Currently the area has been paved and is used by the Allegany Department of Public Works as a parking lot.

VI Summary of Proposed Corrective Measures/Remedial Action

EPA acknowledges that an evaluation of multiple alternatives is not always necessary, particularly if a remedy decision can be determined based on previous investigations/remedial actions, and RCRA site characterization investigations. In this case, a review of several investigation reports revealed that sources of contamination had been identified and remediated prior to the closure of the facility. EPA completed four rounds of environmental sampling during 2002, 2003, and 2006 to further assess levels of contamination present at the facility. Results of the EPA sampling events revealed levels of soil contamination that present an acceptable risk for the anticipated reuse of the former KST site for industrial purposes. Analytical results of groundwater, surface water and sediment revealed the presence of manganese and benzene at levels exceeding their respective RBCs. However, the groundwater at the site is not used for potable purposes. Furthermore, results of surface water and sediment samples from the nearby Potomac River indicate that groundwater from the site is not having an

impact on the Potomac. EPA will require that a re-sampling of the groundwater be conducted in the future to confirm no adverse impacts to environmental quality are occurring. In addition, institutional controls will be assigned to the property, limiting reuse of the property for industrial/commercial purposes only.

VII Public Participation

EPA is requesting comments from the public on its proposal that no additional corrective action, other than groundwater monitoring and the assigning of institutional controls will be required at this facility at this time. The public comment period will last forty-five (45) calendar days from the date that this matter is publicly noticed in a local newspaper (May 30, 2007). Comments may be sent to EPA in writing at the EPA address listed below, and all commentors will receive a copy of the final decision and a copy of the response to comments.

A public meeting will be held upon request. Requests for a public meeting should be made to Mr. Bill Wentworth of the EPA Regional Office at the address below or at (215) 814- 3184.

The Administrative Record contains all information considered by EPA when making this proposal to not require additional corrective action at this facility at this time. The Administrative Record is available at the following locations:

U.S. Environmental Protection Agency
Region III
1650 Arch Street - 3WC23
Philadelphia, PA 19103-2029
Contact: Bill Wentworth Voice: (215) 814-3184
Fax: (215) 814-3113
Hours: Mon-Fri, 9:00 A.M - 5:00 P.M.
E-mail: wentworth.william@epa.gov

Allegany County Library
31 Washington Street
Cumberland, MD 21545
Contact: Ms. Maryland Appel, Branch Manager
(301) 777-1200.

Allegany County Economic Development
701 Kelly Road, Suite 400
Cumberland, MD 21502
Contact: Tim Carney Voice: (301) 777-5967
Fax: (301)777-2194

Following the forty-five (45) calendar day public comment period, EPA will prepare a final decision which will address all written comments and any substantive comments presented verbally at a public meeting. This final decision will be incorporated into the Administrative Record. If the comments are such that significant changes are made to the proposal that no further action is needed other than groundwater monitoring and institutional controls at this facility, EPA will seek public comments on the revised proposal.