



UNITED STATES

ENVIRONMENTAL PROTECTION AGENCY

REGION III

STATEMENT OF BASIS

RHODIA INCORPORATED

BALTIMORE, MARYLAND

EPA ID NO. MDD 003063476

I. Introduction

A. Facility Name

The United States Environmental Protection Agency (EPA) has prepared this Statement of Basis (SB) for Rhodia Inc., located at 3440 Fairfield Road, Baltimore, Maryland 21226 (hereinafter referred to as the Facility).

The Facility is subject to the 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. Sections 6901 to 6992k. The Corrective Action program is designed to ensure that certain facilities subject to RCRA have investigated and cleaned up any releases of hazardous waste and hazardous constituents that have occurred at their property.

Information on the Corrective Action program as well as a fact sheet for the Facility can be found by navigating <http://www.epa.gov/reg3wcmd/correctiveaction.htm>.

B. Proposed Decision

EPA's review of available information indicates that there are no unaddressed releases of hazardous waste or hazardous constituents from the Facility. Based on that assessment, our proposed decision is that no further investigation or cleanup is required. EPA's proposed decision meets the criteria for "Corrective Action Complete without Controls" set forth in EPA Guidance found in the Federal Register / Vol. 68, No. 37 / Tuesday, February 25, 2003 / Notices [FRL – 7454-7] pages 8757 to 8764.

EPA has determined that its proposed decision for the Facility is protective of human health and the environment and that no further corrective action or controls are necessary at this time.

C. Public Participation

Interested persons are invited to comment on EPA's proposed decision. The public comment period will last thirty (30) calendar days from the date that notice is published in a local newspaper. Comments may be submitted by mail, fax, e-mail, or phone to Mr. Erich Weissbart at the address listed below. EPA will hold a public meeting to discuss this proposed decision upon request. Requests for a public meeting should be made to Mr. Weissbart at the address listed below.

EPA has developed an Administrative Record (AR) for this proposed decision which contains all information considered by EPA during the process. The AR is available at the following location:

U.S. EPA Region III
1650 Arch Street

Philadelphia, PA 19103
Contact: Mr. Erich Weissbart (3LC20)
Phone: (215) 814-3284
Fax: (215) 814 - 3113
Email: weissbart.erich@epa.gov

EPA encourages interested persons to participate in the remedy selection process by reviewing this SB and documents contained in the AR. The AR contains the complete information that EPA reviewed prior to this proposed decision.

EPA will address all significant comments received during the public comment period. If EPA determines that new information or public comments warrant a modification to the proposed decision, EPA will modify the proposed decision or select other alternatives based on such new information and/or public comments. EPA will approve its final decision in a document entitled the Final Decision and Response to Comments (FDRTC). Any person who comments on the decision will automatically receive a copy of the FDRTC. Any other person wishing to receive a copy of the FDRTC may obtain one by contacting Mr. Erich Weissbart.

II. Facility Background

Rhodia operates a surfactants and specialty chemical production facility at 3440 Fairfield Road in the Curtis Bay area of Baltimore, Maryland. The 7-acre site was originally owned and operated by Alcolac which was founded in 1948 and began manufacturing at the site in 1950. Alcolac initially began operations on approximately 5.3 acres leased from U.S. Industrial between 1950 and 1953. U.S. Industrial was sold to National Distillers Products, Inc. and on February 4, 1953, the 5.3-acre tract was purchased from National Distillers Products, Inc. Two small adjoining tracts of land were later purchased which brought the total acreage to approximately 6.7 acres.

During the 1980s, the RTZ Corporation owned Alcolac, Inc., which in turn owned and operated the facility at that time. In 1990, Rhone-Poulenc, Inc. (Rhone-Poulenc) acquired Alcolac (which remained the site owner) and operated the facility. In 2000, Rhone-Poulenc spun off Rhodia as a separate entity. At that time, Rhodia became the parent company of Alcolac and Rhodia began operating the site. Alcolac remains the owner of the site.

The various companies occupying the site have historically made chemical intermediates for a variety of domestic and international markets. Specifically, Rhodia produces sulfates (anionic surfactants), amides and monomers, which are used in the manufacturing and preparation of personal care products, industrial cleaners, agricultural products, latex, and clear coat finishes.

III. Summary of Environmental History

A Consent Order was issued in the mid 1990s to address various air issues. Specifically, this Consent Order addressed the unloading, storage, and use of ethylene oxide at the Baltimore Plant. Two scrubbers and Best Available Control Technology (BACT) for transfer systems were installed as part of the compliance. Ethylene oxide handling and use was discontinued at the Baltimore Plant in 1996. Rhodia currently maintains three permits: an operating permit for an organic chemical plant

with Maryland; an oil operations permit to store No. 2 heating oil for their boilers; and, a waste water discharge permit with Baltimore for the Publicly Operated Treatment Works.

Review of all available records and discussions during a June 15, 2010 site visit indicate that there have been no reportable releases, no instances or evidence of soil or groundwater contamination, no site remediation, and no past, current, or planned monitoring efforts necessary at this Facility. The record review and site visit are documented in the Final Environmental Indicator Inspection Report which is contained in the AR and available upon request.