



UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION III

STATEMENT OF BASIS

FORMER SCOTT PAPER RESEARCH FACILITY

TINICUM TOWNSHIP, PA

EPA ID NO. PAD001287879

Prepared by  
Office of Pennsylvania Remediation  
Land and Chemicals Division  
August 2012

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## Section 1: Introduction

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The United States Environmental Protection Agency (EPA) has prepared this Statement of Basis (SB) to solicit public comment on its proposed decision for the Former Scott Paper Research Facility located at Route 291 & Tinicum Island Road, Tinicum Township Delaware County, Pennsylvania 19153 (Facility). 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, EPA's proposed decision is that no further investigation or cleanup is required. EPA has determined that its proposed decision is protective of human health and the environment and that no further corrective action or land use controls are necessary at this time. This SB highlights key information relied upon by EPA in making its proposed decision.

The Facility is subject to EPA's 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. §§ 6901 et seq. (Corrective Action Program). 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. The Commonwealth of Pennsylvania (Commonwealth) is not authorized for the Corrective Action Program under Section 3006 of RCRA. Therefore, EPA retains primary authority in the Commonwealth for the Corrective Action Program.

The Administrative Record (AR) for the Facility contains all documents, including data and quality assurance information, on which EPA's proposed decision is based. See Section 5, Public Participation, for information on how you may review the AR.

## Section 2: Facility Background

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The Former Scott Paper Research Facility was a paper and paper pulp product research and development facility. The 28 acre facility (formerly Scott Plaza III, currently International Plaza) was located on the southern side of Route 291, north of the Philadelphia International Airport, in Tincum Township, Delaware County, Pennsylvania. The facility and associated building no longer exist. The area is open space and parking lots for the International Plaza complex.

Scott Plaza I, II, and III were completed in 1961, post 1961, and 1969, respectively. Scott Plaza I was the corporate offices, Scott Plaza II was the administrative support staff offices, and Scott Plaza III was the research and development building. From the early 1970s to 1986, Scott Plaza III was used for the research of organic synthesis in paper and paper pulp technology. From 1986 through at least 1991, Scott Plaza III was used for research and development of “Wet Wipes”, lotion manufacturing, fiber technology, paper-making mill trials, and latex polymer emulsions.

The Tincum National Environmental Center is located north of the facility. South and west of the facility are industrial complexes, then the Philadelphia International Airport. Philadelphia Airport is located east of the facility. The property is surrounded by commercial properties and transportation infrastructure, including South Governor Printz Boulevard and Interstate 95 to the north, and the Philadelphia International Airport to the west (airport parking), south, and east. Wetlands and ponds are located north of the highways. The Delaware River is located south of the airport. A location map and a Facility layout are attached as Figures 1 and 2, respectively.

Scott Paper Company owned and operated Scott Plaza since the beginning of its construction in 1961. Prior to construction, the property was swamp-land. After the merger with Kimberly-Clark, in October 1995, Scott Paper Company sold Scott Plaza to Koll Bren Scheiber Realty Advisors. In 2002, the owner was identified as Koll Bren Scheiber Realty Advisors of Newport Beach, CA. Currently, Plaza I and II are operational and include 27.05 acres of land. Plaza III was demolished in 2003.

In August 1980, the Scott Paper Company filed a Notification of Hazardous Waste Activity form for the Scott Paper Research Facility. The facility was assigned EPA ID Number PAD001287879. In November 1980, the Scott Paper Company submitted a Part A Hazardous Waste Permit Application for the Scott Paper Research Facility for its storage of hazardous waste. The hazardous wastes identified on the permit application and the notification included spent halogenated solvents (F001 and F002), spent nonhalogenated solvents (F003 and F005), ignitable hazardous waste (D001), reactive waste (D002), corrosive waste (D003), toxic waste (D000), and commercial chemical products hazardous wastes (U and P listed). The facility storage code was identified as S01. In July 1983, the Scott Paper Company requested to withdraw its Part A Permit Application.

Statement of Basis

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### **Section 3: Summary of Environmental History**

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On February 15, 2012, EPA and Michael Baker Jr., Inc. performed an Environmental Indicator inspection at the facility. Based upon information in the Environmental Indicator Inspection Report dated April 2012 prepared for EPA by Michael Baker Jr., Inc., EPA identified five former Solid Waste Management Units (SWMUs) at the facility. These SWMUs included Chemical Storage/Hazardous Waste Room (SWMU #1), Drum Storage Shed (SWMU #2), Parts Cleaning Room (SWMU#3), Drum Coral (SWMU#4), and Trash Dumpster (SWMU #5). These SWMUs no longer exist as Plaza III was demolished in 2003. The SWMU areas are currently an active asphalt-paved parking area for International Plaza. There were no documented releases from these SWMUs.

In October 1986, the facility contacted the Pennsylvania Department of Environmental Protection (PADEP) and the US Coast Guard to report a rupture of the 10,000-gallon No. 2 fuel oil underground storage tank (UST) used for the boiler at Scott Plaza III. The release was cleaned-up with procedure reviewed by PADEP. The UST and 16,634 tons of contaminated soil were removed and disposed offsite by Boyertown Sanitary Disposal, Incorporated.

The site is essentially capped with pavement and is surrounded by commercial properties and transportation infrastructures. No contaminated soil and/or groundwater are expected at the site.

### **Section 4: Environmental Indicators**

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EPA sets national goals to measure progress toward meeting the nation's major environmental goals. For Corrective Action, EPA evaluates two key environmental indicators for each facility: (1) current human exposures under control and (2) migration of contaminated groundwater under control. The EPA has determined that the Facility met current human exposure under control indicator on July 12, 2012. The EPA has determined that the Facility met the migration of contaminated groundwater under control indicator on July 13, 2012.

## Section 5: Public Participation

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Before EPA makes a final decision on its proposal for the Facility, the public may participate in the decision selection process by reviewing this SB and documents contained in the Administrative Record (AR) for the Facility. The AR contains all information considered by EPA in reaching this proposed decision. It is available for public review during normal business hours at:

U.S. EPA Region III  
1650 Arch Street  
Philadelphia, PA 19103  
Contact: Ms. Tran Tran  
Phone: (215) 814-2079  
Fax: (215) 814-3113  
Email: tran.tran@epa.gov

Interested parties are encouraged to review the AR and 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. You may submit comments by mail, fax, or e-mail to Ms. Tran Tran. EPA will hold a public meeting to discuss this proposed decision upon request. Requests for a public meeting should be made to Ms. Tran Tran.

EPA will respond to all relevant comments received during the comment period. If EPA determines that new information warrants 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 announce its final decision and explain the rationale for any changes in a document entitled the Final Decision and Response to Comments (FDRTC). All persons who comment on this proposed decision will receive a copy of the FDRTC. Others may obtain a copy by contacting Ms. Tran Tran at the address listed above.

Date: \_\_\_\_\_

Abraham Ferdas, Director  
Land and Chemicals Division  
US EPA, Region III

Statement of Basis

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## **Index to Administrative Record**

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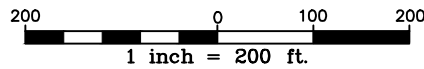
Environmental Priorities Initiative, Preliminary Assessment of Scott Paper Research Facility, NUS Corporation, July 3, 1991.

Final Environmental Indicator Inspection Report for Scott Paper Research Facility, Route 291 & Tinicum Island Road, Philadelphia, Pennsylvania 19153, prepared by Michael Baker Jr., Inc., April 2012





BOUNDARY IS APPROXIMATE USING GOOGLE HISTORICAL IMAGE DATABASE  
 IMAGE SOURCE: www.pamap.pasda.psu.edu. 2008



LAT=39°52'26.34"N  
 LON=75°15'34.59"W

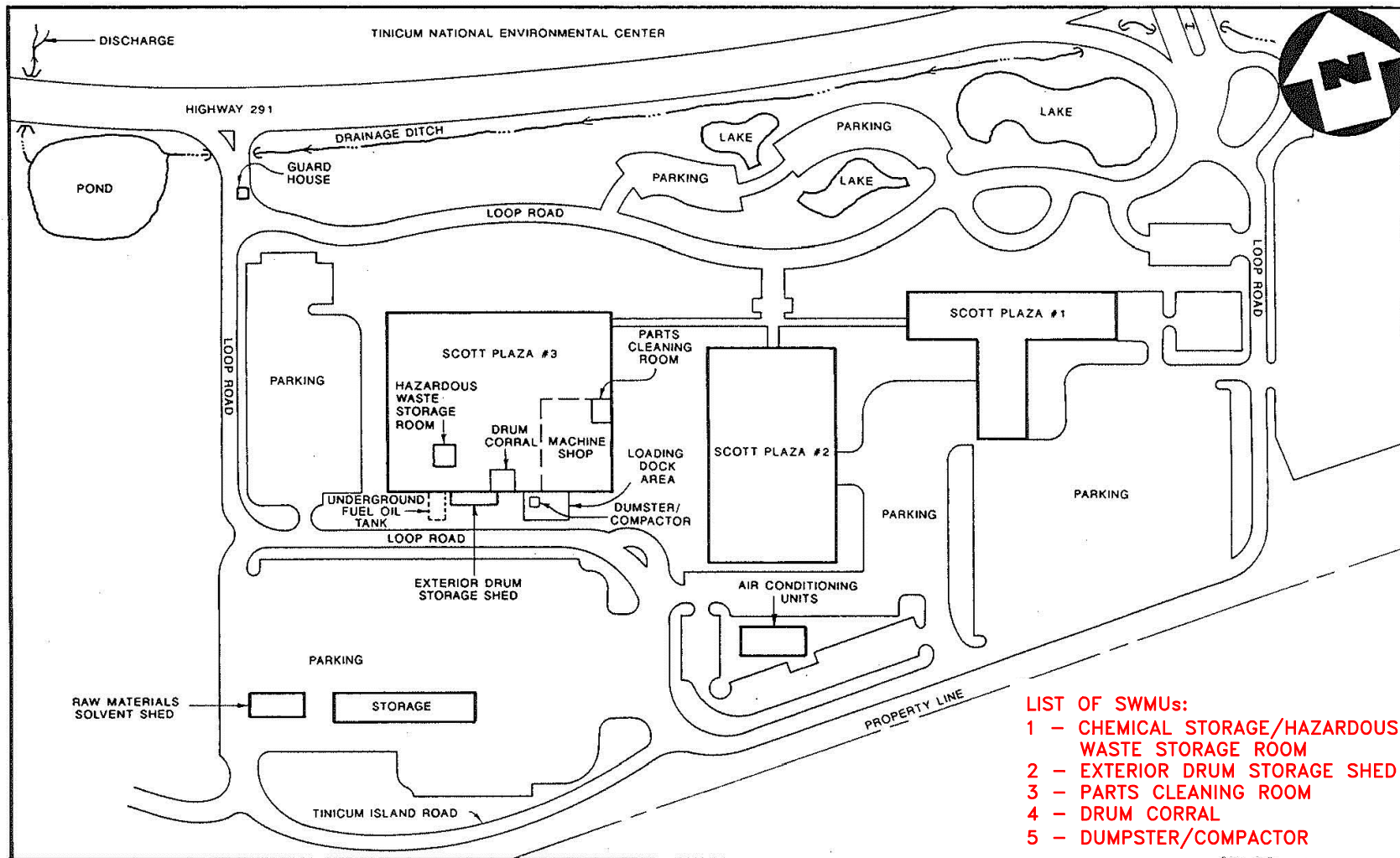
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 DSN/DWN: AAF/RRR

DATE: MARCH 2012  
 FILE: 124502\_SPC\_01  
 CHK: SF

**Baker** MICHAEL BAKER JR., INC.  
 MOON TOWNSHIP, PENNSYLVANIA

FIGURE 1  
 FACILITY LOCATION MAP  
 SCOTT PAPER RESEARCH FACILITY  
 PHILADELPHIA, PENNSYLVANIA 19153





SITE SKETCH

SCOTT PAPER RESEARCH FACILITY

(NO SCALE)

FIGURE 2.2



**NOTE:**  
 SWMUs IDENTIFIED PER NUS PRELIMINARY ASSESSMENT, 1991.

**BAKER EDITS**

SOURCE: NUS CORPORATION FIGURE 2.2

SCALE: Not To Scale DATE: MARCH 2012  
 S.O. NO.: 124502 FILE: 124502\_SPC\_02  
 DSN/DWN: AAF/RRR CHK: SF



MICHAEL BAKER JR., INC.  
 MOON TOWNSHIP, PENNSYLVANIA

FIGURE 2  
 SITE SKETCH  
 SCOTT PAPER RESEARCH FACILITY  
 PHILADELPHIA, PENNSYLVANIA 19153