



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III

STATEMENT OF BASIS

WESTLAKE PLASTICS COMPANY, INC.
LENNI, PENNSYLVANIA

EPA ID No. PAD002346773

Prepared by
Office of Pennsylvania Remediation
Land and Chemicals Division

April 2013

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List of Commonly Used Acronyms

AOC	Area of Concern
AR	Administrative Record
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
EI	Environmental Indicator
EPA	Environmental Protection Agency
EPI	Environmental Priorities Initiative
FDRTC	Final Decision and Response to Comments
HSWA	Hazardous and Solid Waste Amendments
NFA	No Further Action
NOV	Notice of Violation
PADEP	Pennsylvania Department of Environmental Protection
PA	Preliminary Assessment
RCRA	Resource Conservation and Recovery Act
SB	Statement of Basis
SVOC	Semi-Volatile Organic Compound
SWDA	Solid Waste Disposal Act
SWMU	Solid Waste Management Unit
UST	Underground Storage Tank
VOC	Volatile Organic Compound

Section 1: Introduction

The U.S. Environmental Protection Agency, Region 3 (EPA) has prepared this Statement of Basis (SB) under the Corrective Action Program to solicit public comment on its proposed decision for the Westlake Plastics Company, Inc. (Westlake) facility located at 490 Lenni Road, Lenni, Pennsylvania 19052 (Facility or Site). 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 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.

The Facility is subject to EPA's Corrective Action Program under the Solid Waste Disposal Act (SWDA), 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

This SB highlights key information relied upon by EPA in making its proposed decision. For additional information, please refer to the Administrative Record (AR) for the Facility, which contains all documents, including data and quality assurance information, on which EPA's proposed decision is based. The Index to the AR may be found in Section 10 of this SB. See Section 9, Public Participation, for information on how you may review the documents contained in the AR and submit any comments you may have concerning EPA's proposed decision for the Facility.

Section 2: Facility Background

Westlake is located at 490 Lenni Road in Lenni, Delaware County, Pennsylvania (**Figure 1**). The Facility is composed of two separate properties (referred to as Section No. 1 and Section No. 2), which are separated by Lenni Road, Chester Creek, and a privately owned parcel of land. Section No. 1 (**Figure 2**), the northernmost section, is located in Chester Heights Borough and consists of three parcels of land totaling approximately 8.6 acres. Section No. 1 is bordered on the south by Lenni Road, on the east by Chester Creek, and the west and north by wooded areas. Section No. 2 (**Figure 3**) is located in Middletown Township and consists of two parcels of land totaling approximately 12 acres. Section No. 2 is bordered on the north by Lenni Road, on the west and south by Chester Creek, and on the east by a partially wooded/field area. The area surrounding the Facility is primarily a wooded residential area. A small number of commercial and industrial enterprises are scattered throughout, with the majority located east and south of the Facility.

Westlake was founded in 1951 and purchased the properties that comprise Section No. 1 and Section No. 2 in 1953. Ownership of the property prior to 1953 is unknown; however, the original Facility buildings were constructed in the mid-1850s and were used as a woolen mill. Westlake is a subsidiary of Pacific World Corporation and manufactures thermoplastic and thermoset plastic products by extrusion and compression-molding methods. The products are fashioned by melting plastic pellets (raw material) and forcing the liquid plastic into molds and dies to form the desired shape, such as rods, slabs, sheets, and film. The extrusion process is performed at Section No. 1; Section No. 2 is utilized by the Facility to receive deliveries, store extruded materials prior to annealing, anneal extruded material in hot air ovens, fabricate extruded materials, and store finished products.

Historically, newly formed plastics were annealed in a bath of high temperature lubricating oil (annealing oil) or diethylene glycol to prevent brittleness and remove internal stress created during the extrusion process. Following the annealing process, the plastics were washed with mineral spirits to remove residual oil, generating a mixture of spent annealing oil and mineral spirits (i.e., petroleum naphtha) waste stream. The spent annealing oil/mineral spirit mixture was stored in 55-gallon drums and managed as an ignitable (EPA Hazardous Waste Code D001) characteristic hazardous waste. The spent annealing oil/mineral spirit mixture was reclaimed on-site through distillation to recover the mineral spirits for reuse in the Facility's manufacturing operations. The waste annealing oil and the still bottoms generated by the distillation unit were determined to be non-hazardous and were shipped off-site for disposal.

In 1994, large hot air ovens were installed in Section No. 2 to replace the annealing baths. As a result, the Facility became a non-generator of hazardous waste.

Section 3: Summary of Environmental History

Summaries of the Facility's former Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs), identified as a result of past operations, are provided below. The SWMUs were identified during a March 8, 1990 Environmental Priorities Initiative (EPI) Preliminary Assessment (PA) conducted by NUS Corporation (NUS). The PA was conducted under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) to evaluate the potential for a release of hazardous substances from the Site. On August 8, 1990, NUS recommended no further action (NFA) for the Site under CERCLA.

SWMU 1 – Former New Product/Raw Material/Waste Drum Storage Area

The former drum storage area was located near the southeastern perimeter of Section No. 2, along Chester Creek. The area consists of a concrete containment receptacle that is approximately 30 feet long, 5 feet wide and 1.5 feet high. Materials stored in this area included annealing oil, methanol (used as an anti-freeze agent in Facility's non-contact cooling water system; discontinued in mid-1990's), diethylene glycol, and mineral spirits. SWMU 1 was in operation between 1985 and 1999. No spills and/or releases have been reported or documented for this unit and no stained soils were observed by NUS during the 1990 PA.

SWMU 2 – Former Used Annealing Oil Drum Storage Area

The former used annealing oil drum storage area was located on the southeast end of the Section No. 1 building, east of the water cooling area containment structure. The unit was consisted of an uncovered concrete pad with a cinder-block berm along a majority of its perimeter and it was surrounded by an eight-foot high chain-link fence with a locked gate. The Facility used this area to store 55-gallon drums of waste annealing oil generated by the Facility's on-site distillation of spent mineral spirits/annealing oil mixtures. SWMU 2 was in operation prior to 1980 and remained active until the mid-1990's. During the 1990 NUS site visit, stained soils were observed near the entrance gate where a section of the cinder-block berm was missing. The unit was empty and no signs of releases or spills were evident at the time of the February 2012 EI Inspection.

SWMU 3 – Former Distilling/Annealing Rooms

The former annealing room was located inside of the south end of the Section No. 1 building. This room housed several above-ground annealing oil tanks (3,000-gallon, 3/32-inch thick steel walled tanks) and the diethylene glycol tank. The floor was constructed of concrete and one blind concrete trench was located near the annealing tanks that extended to the east. On the east end of the room were two doorways that led to the distillation room. A nine-inch high concrete berm and six-inch high retractable dam berm (dike) were installed at the doorways. The floor drain was blocked off near the dike to prevent oil spillage from migrating beyond the annealing room. Spills of annealing oil were directed into the trench and vacuumed out into drums. Wastes

managed in the annealing room included 55-gallon drums of used annealing oil and used annealing oil/mineral spirit mixtures.

The distillation room was located in a separate room to the east of the annealing room and consisted of a concrete floor and cinder-block walls. The distillation unit was situated directly on the concrete floor. No berms were located in the doorway leading to the distillation unit, and no floor drains were observed in the distillation room. Operation of the distillation room was initiated some time before 1985 and ceased operation in the mid-1990's. No releases were reported or documented for SWMU 3; however, during the 1990 NUS site visit, the floor near the distillation unit and the annealing tanks was reported to be heavily coated with oil.

The former annealing room currently houses one extruder that is equipped with a remote self-sustaining non-contact cooling water system. The room was clean, and the floor trench was covered with steel during the February 2012 EI Inspection. The former distillation room is currently used for storage. The area was clean and the cinder-block wall enclosing the room had been removed. No signs of releases or spills were evident from SWMU 3 at the time of the February 2012 EI Inspection.

SWMU 4 – Former Empty Drum Storage Area

The former empty drum storage area was located outside the Section No. 2 warehouse, west of the new product/raw material drums storage area (SWMU 1). Empty product drums (e.g., annealing oil, mineral spirits) were stored on wooden pallets on the gravel/dirt ground surface and were either returned to the supplier or used by the Facility for non-liquid material storage. Surface run-off from this unit is to the east, toward Chester Creek. No releases were reported or documented for SWMU 4. It is unknown when SWMU 4 began operation. This unit is not currently being used for storage.

AOC 1 – Fuel Oil Underground Storage Tank

One 8,000-gallon steel underground storage tank (UST) containing No. 2 fuel oil was located at Section 1 to heat the building. The UST was located in the parking lot east of the former used annealing drum storage area (SWMU 2). Due to the close proximity of high tension transformers, the Facility cleaned and closed the UST in place in 1998 and changed the fuel source for the Facility to natural gas.

In October 1998, GAC Associates, Inc. (GAC) was contracted to collect three soil samples from directly beneath the UST (0 to 1 foot interval) along the centerline of the tank. The samples were analyzed for heating oil constituents (benzene, toluene, ethylbenzene, cumene, naphthalene, fluorine, and phenanthrene). Naphthalene was detected in two soil samples (Sample S1 @ 700 ug/kg; Sample S3 @ 150 ug/kg) below the Pennsylvania Department of Environmental Protection's (PADEP) action level of 8,000 ug/kg. None of the other parameters analyzed were detected above the practical quantitation limits (PQL).

AOC 2 – Section No. 2 Warehouse Drum Storage Area

During a March 28, 1984 industrial waste inspection by PADEP, drums of raw materials, waste mineral spirits, and waste annealing oil were being improperly stored behind the warehouse on Section No. 2. PADEP issued the Facility a Notice of Violation (NOV) on April 5, 1984. The NOV recommended that the drum storage area be provided with an impermeable pad and dike, or the drums of material should be moved to a storage area inside of the building.

PADEP conducted a follow up inspection on December 18, 1984 and noted that drums of raw and waste materials were still being improperly stored behind the warehouse on Section No. 2. PADEP issued the Facility a NOV for this violation on January 7, 1985 stating that the drums must be stored on an impervious and adequately sized pad equipped with secondary containment. PADEP conducted an industrial waste inspection of the Facility on August 29, 1985 which revealed the drum storage area containment structure had been constructed; however, it was not being used. Drums of material were still being stored in an uncontained area adjacent to the containment structure.

Review of all available records and discussions during an EPA February 29, 2012 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. Throughout its operational history, spent mineral spirits (i.e., petroleum naphtha) was the only hazardous waste stream generated by the Facility. The mineral spirit waste stream generated by the Facility was hazardous because it exhibited the characteristic of ignitability (EPA Hazardous Waste Code D001); it did not contain any hazardous constituents. Petroleum naphtha is not pervasive in the environment; therefore, in the event of a spill or release, it would be readily metabolized through natural attenuation. The remainder of the materials historically handled throughout the Facility, and in the four SWMUs described above, are non-regulated and include diethylene glycol, methanol, and annealing oil. Therefore, EPA is proposing No Further Action for the Facility under the RCRA Corrective Action Program. The record review and site visit are documented in an August 2012 Environmental Indicator Inspection Report, prepared by Michael Baker Jr., Inc. All documents on which EPA's proposed decision is based are contained in the AR and available upon request.

Section 4: Environmental Indicators

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 these indicators on March 26, 2013.

Section 5: Public Participation

Before EPA makes a final decision on its proposal for the Facility, the public may participate in the remedy 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: Jeanna R. Henry
Phone: (215) 814-2820
Fax: (215) 814-3113
Email: henry.jeannar@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 Jeanna R. Henry. EPA will hold a public meeting to discuss this proposed decision upon request. Requests for a public meeting should be made to Jeanna R. Henry.

EPA will respond to all relevant comments received during the comment period. If EPA determines that new information 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 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 Jeanna R. Henry at the address listed above.

Date: _____

3.29.13



John A. Armstead, Director
Land and Chemicals Division
US EPA, Region III

Section 6: Index to Administrative Record

1. *Environmental Indicator Inspection Report for Westlake Plastics Company, Inc.*, prepared by Michael Baker Jr., Inc., August 2012.
2. *Environmental Priorities Initiative Preliminary Assessment of Westlake Plastics*, prepared by NUS Corporation, August 8, 1990.
3. Westlake Plastics Company, Inc. *Notification of Hazardous Waste Activity*, August 18, 1980
4. PADEP Inspection Report – Hazardous Waste Small Quantity Generator, August 7, 1997.

Figures



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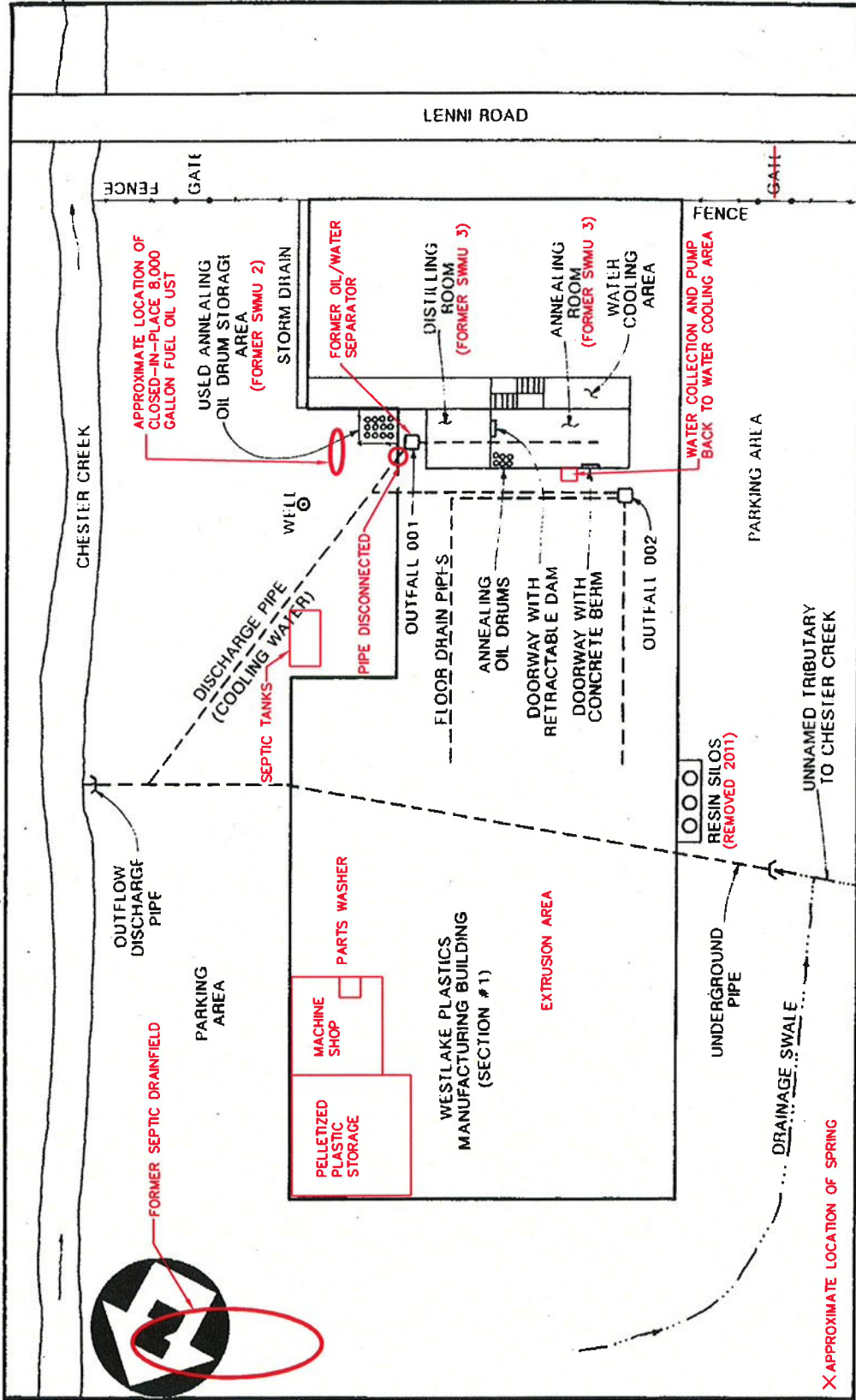
FIGURE 1
 FACILITY LOCATION MAP
 WESTLAKE PLASTICS COMPANY, INC.
 LENNI, PENNSYLVANIA 19052

MICHAEL BAKER JR., INC.
 MOON TOWNSHIP, PENNSYLVANIA



Source: Pennsylvania Spatial Data Access 2008
 ftp://pamap.pasda.psu.edu/

SCALE: 1"=200'
 DATE: AUGUST 2012
 S.O. NO.: 124510
 FILE: 124510_WP_01
 DSN/DWN: JBM/RRR
 CHK: SRF



2-3

FIGURE 2.2

SITE SKETCH/MANUFACTURING BLDG.
WESTLAKE PLASTICS, LENNI, PA



FIGURE 2

SECTION NO. 1 SITE SKETCH
WESTLAKE PLASTICS COMPANY, INC.
LENNI, PENNSYLVANIA 19052

MICHAEL BAKER JR., INC.
MOON TOWNSHIP, PENNSYLVANIA



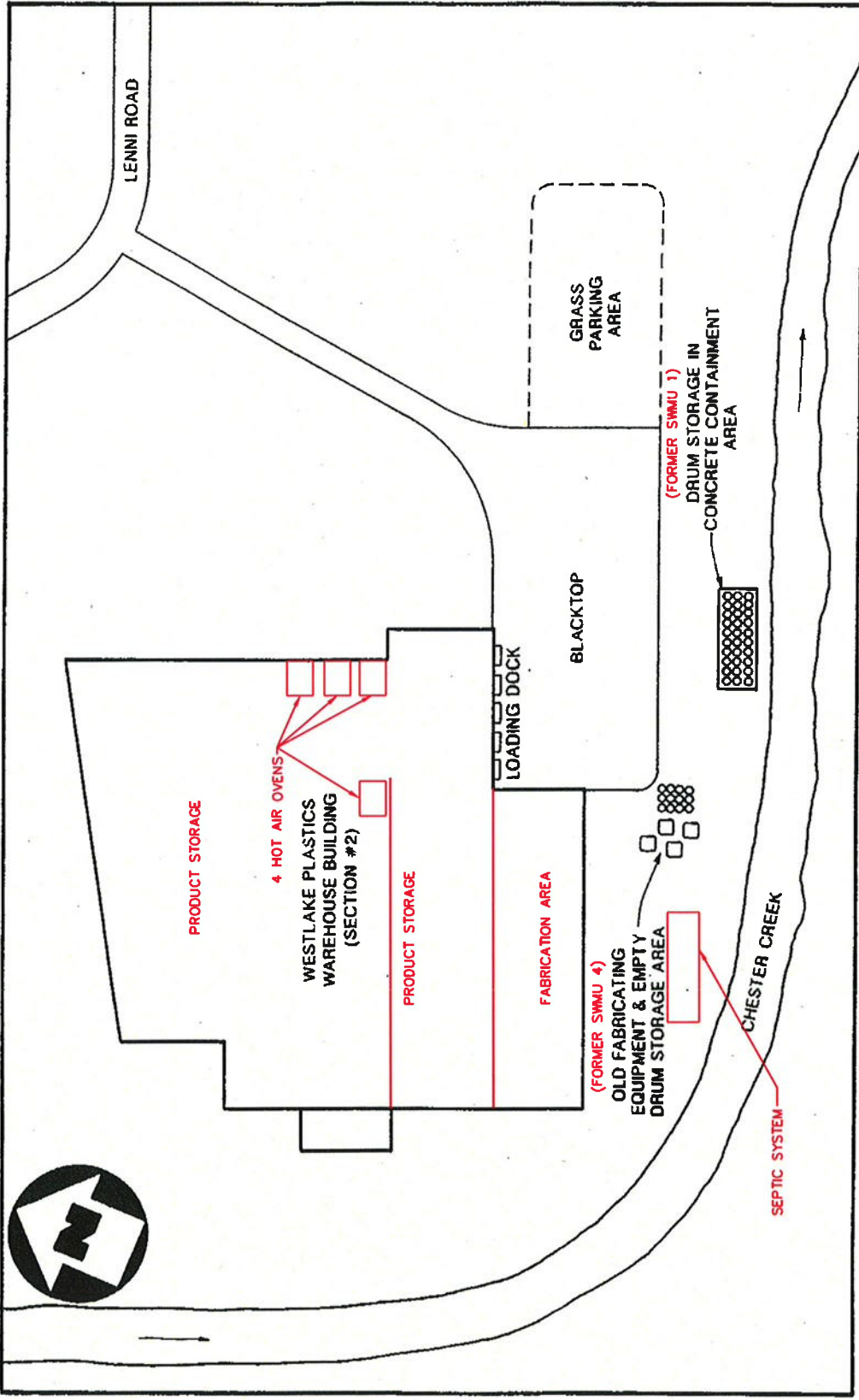
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FEATURES IN RED ADDED BY BAKER

SCALE: NOT TO SCALE DATE: AUGUST 2012

S.O. NO.: 124510 FILE: 124510_WP_02

DSN/DWN: JBM/RRR CHK: SRF



2-4

FIGURE 2.3
 SITE SKETCH/WAREHOUSE
 WESTLAKE PLASTICS, LENNI, PA
 (NO SCALE)



FIGURE 3
 SECTION NO. 2 SITE SKETCH
 WESTLAKE PLASTICS COMPANY, INC.
 LENNI, PENNSYLVANIA 19052

MICHAEL BAKER JR., INC.
 MOON TOWNSHIP, PENNSYLVANIA



SCALE: NOT TO SCALE DATE: AUGUST 2012
 S.O. NO.: 124510 FILE: 124510_WP_02
 DSN/DWN: JBM/RRR CHK: SRF

FEATURES IN RED ADDED BY BAKER