

**Long Term Stewardship Report
Copperhead Chemical Company
120 River Road, Tamaqua, PA 18252
PAR000030874
(A parcel of Former ICI Explosives - PAD071203046)
September 26, 2016**

A. Pre-Inspection Items

Prior to the site visit, the following pertinent documents were reviewed to ensure remedial components are adequate and up to date:

1. 09/28/2007 EPA FDRTC

Remedy – The FDRTC requires deed restriction language to restrict land to non-residential use and GW to non-potable uses.

Facility Parceling – The former ICI Explosives facility was divided into 3 parcels for sale purposes. The attached figure shows property boundaries and current owners. This inspection Report is for the Copperhead Chemical Company parcel on the northern half of the former ICI Explosives property.

In addition, the financial assurance state of the former facility was confirmed; EPA fact sheets, links and mapping documents were reviewed and updated; and a site visit was coordinated in conjunction with PADEP and Copperhead Chemical Company. A meeting with the Walker Township officials may be scheduled at a future date.

B. Site visit 07/19/2016

1. Attendees

Name	Affiliation	Phone	Email
Linda Matyskiela	EPA Proj Mgr	215.814.3420	Matyskiela.Linda@epa.gov
Alex Zdzinski	PADEP – NERO PG	570.826.2511	azdzinski@pa.gov
Hoa Dao	PADEP – NERO chemist		
Kaiya Campbell	Safety, Health & Environment Supervisor	570.386.6152	KCampbell@copperheadchemical.com

2. Introductions and purpose of visit

3. File review

Do owners of the property have a copy of:

a. 09/28/2007 EPA FDRTC

Y X N

EPA provided FDRTC at the LTS visit to Kaiya Campbell to ensure facility has a copy.

4. Site Walk

a. Assess locations and conditions of entire acreage:

1. Are there any homes on the property? **No. Property is being used for explosives manufacturing using many of the same buildings as former ICI.**

2. Is GW used for potable purposes? **No. There are no drinking water wells on the property.**

Questions/discussion:

1. There is deed restriction language. Is there a plan for a covenant for the property?

ICI sold property to new owners before covenants were common. Deed language of land and groundwater use restrictions in deeds of current owners. Owners may be interested in recording a covenant. More discussion with Copperhead will follow.

2. Are there any other ordinances that put restrictions on land use or GW use?

EPA 2007 FDRTC restricts land use to non-residential and GW use to non-potable and non-agricultural. No municipal ordinances put restrictions on use.

3. Any GIS info/data still needed by EPA? PADEP?

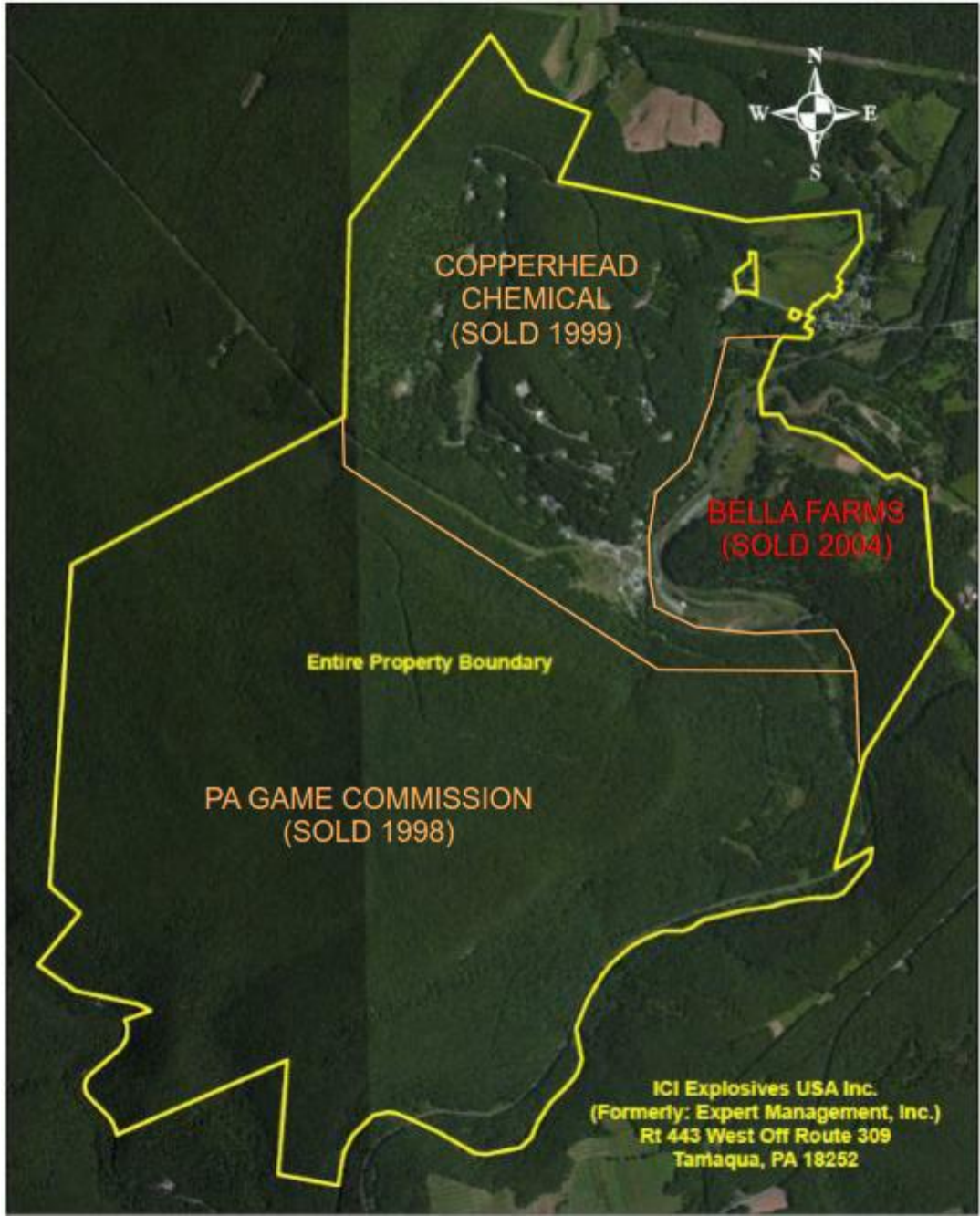
No. EPA has property boundaries.

4. FA obligations up to date? Bond amount?

No FA has been or is expected to be required as there are no active remedy components.

C. Overview of Compliance with and Applicability/Effectiveness of Remedy

Remedy of: 1) non-residential land use restrictions; and 2) no potable use of GW is effective in mitigating any exposures to remaining residual soil and groundwater impacts (investigation used non-residential standards and an ACL for Little Schuylkill River). The Remedy is **being complied with** by the currently property owners.



COPPERHEAD
CHEMICAL
(SOLD 1999)

BELLA FARMS
(SOLD 2004)

Entire Property Boundary

PA GAME COMMISSION
(SOLD 1998)

ICI Explosives USA Inc.
(Formerly: Expert Management, Inc.)
Rt 443 West Off Route 309
Tamaqua, PA 18252