




# **EPA Update – Olin Chemical Site Town of Wilmington Selectman's Meeting**



Lynne Jennings  
Section Chief, MA Superfund Section

5/30/2019

U.S. Environmental Protection Agency

1



# Agenda

- Background
- Status of Investigations and Feasibility Study
- Next Steps and Timeline
- EPA “Administrator's Emphasis List”
- Role of PRP in investigation and cleanup
- Redevelopment at the site



# Background



- 2006 - Site listed on NPL
- PRPs conducting investigations since 2007
- Site divided into 3 areas (operable units, OUs) for study:
  - OU1 – Property
  - OU2 – Surface water and sediments
  - OU3 - Groundwater



# Status of Investigations and Feasibility Study

- In 2015, Olin submitted a draft RI report for the property and the surface waters and sediments (OU 1 and OU2).
- Since then, EPA has been working with Olin to submit a feasibility study to address OU1 and OU2 and issues beyond the property including DAPL and groundwater.
- Multiple disagreements and both informal and formal disputes between EPA and Olin
  - Nature and extent of contamination
  - How to address DAPL
  - Whether early action is appropriate



# Status of Investigations and Feasibility Study

- In March 2018, Olin submitted a more complete Draft RI and FS. However, EPA had substantial comments on this submission.
- In December, we reached agreement on a plan to correct the deficiencies and revise the documents.
- In April 2019 - Olin submitted a draft FS to address DAPL and highly contaminated groundwater – currently under review by EPA.
- On May 24, 2019 - Olin submitted a revised draft FS for OU1 and OU2 – currently under review by EPA.
- On June 28, 2019 - Olin will submit a revised draft RI.



## Next Steps and Timeline

### July/August:

- EPA will complete its review of the current documents.
- EPA may supplement these documents with additional information and alternatives.

### September/October:

- EPA plans to issue a proposed plan for cleanup:
  - Final cleanup plan for all on-property contamination, surface water and sediments
  - Interim cleanup plan for DAPL and highly contaminated GW
- EPA plans to conduct a 30 day comment period (minimum)



## Next Steps and Timeline

### December:

- EPA plans to issue a Record of Decision for cleanup:
  - Final cleanup plan for all on-property contamination, surface water and sediments
  - Interim cleanup plan for DAPL and highly contaminated GW

### Next steps after ROD:

- Negotiate with responsible parties to conduct cleanup.
- Continue to study groundwater and evaluate long term groundwater cleanup options.
- Issue a final cleanup plan in the future.



## Administrator's Emphasis List (AEL)

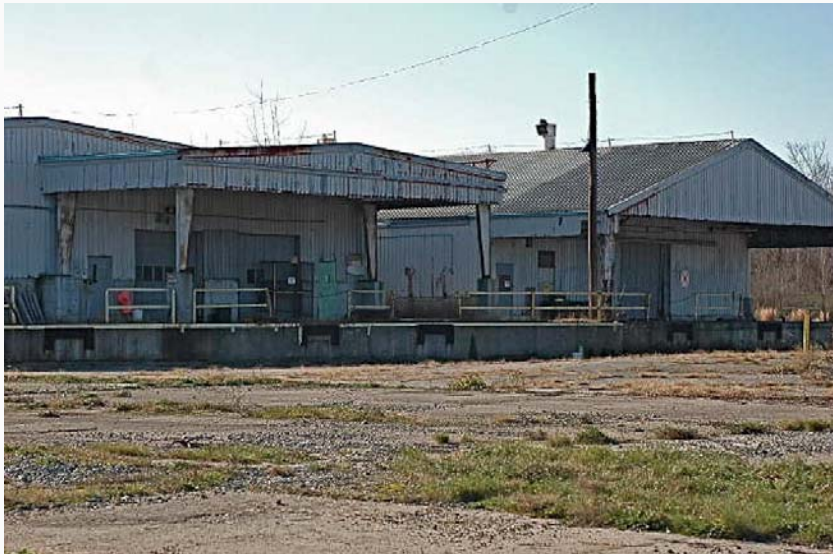


- The Superfund Task Force recommended the creation of the AEL list.
- For sites that might benefit from focused involvement at all levels of EPA to achieve a key milestone.
- For Olin – key milestone is the Record of Decision.





## Administrator's Emphasis List (AEL)



- Why Olin?
  - RI/FS ongoing too long – 12 years
  - Redevelopment stalled because of cleanup issues
- What is benefit?
  - Support from Headquarters if EPA needs to take over work or take enforcement actions
  - Sometimes spurs corporate support to do the right thing



# Role of PRP in Investigations and Cleanup

- The Superfund Law has broad and strong enforcement authorities for compelling responsible parties to conduct the work.
- Responsible parties at Olin Site are former owners/operators: American Bilrite Inc., the Bilrite Corporation, Fisions Limited, NOR-AM Agro LLC, Olin Corporation, and Stepan Company.
- Olin, Bilrite, Stepan signed an Administrative Order to conduct the RI/FS with Olin in lead for conducting.
- After the ROD, EPA will negotiate with all parties for conducting the cleanup.



## Redevelopment at the site

- In October 2018 – GFI approached EPA regarding a plan to redevelop site into an Intermodal Transportation Facility – dealing with consumable commodities.
- Several conference calls and meetings conducted from Oct – March, including a meeting with Olin in April.
- Discussion topics included:
  - GFI proposal for redevelopment – layout of facility on property
  - EPA schedule for investigation and cleanup and how it fits with their timing for redevelopment
  - Whether they could/should proceed without an EPA cleanup plan
  - Liability if they proceed



## Redevelopment at the site

- EPA's Position
  - Generally supportive of redevelopment if it does not result in a risk
  - Best done after cleanup plan selected and implemented
  - Has been done at some sites before this step but very complicated because we need to predict what and where
  - Ultimately, developer bears risk if EPA needs to conduct something in an area after it becomes developed.
  - We encouraged Olin and developer to work cooperatively with EPA to expedite cleanup planning and implementation
- Redevelopment must obtain all local permits and approvals, including zoning.



## Redevelopment at the site

- Specific technical issues:
  - Containment area may need updated cap, building must be engineered to maintain cap and slurry wall.
  - Cleanup may be needed in streams and wetlands, need an area on site to stage this work.
  - More GW investigation work needed on property, best if wells installed before development.
  - May need GW/DAPL extraction/treatment system to be located on the property, need to know where this will be located in concert with development plans.



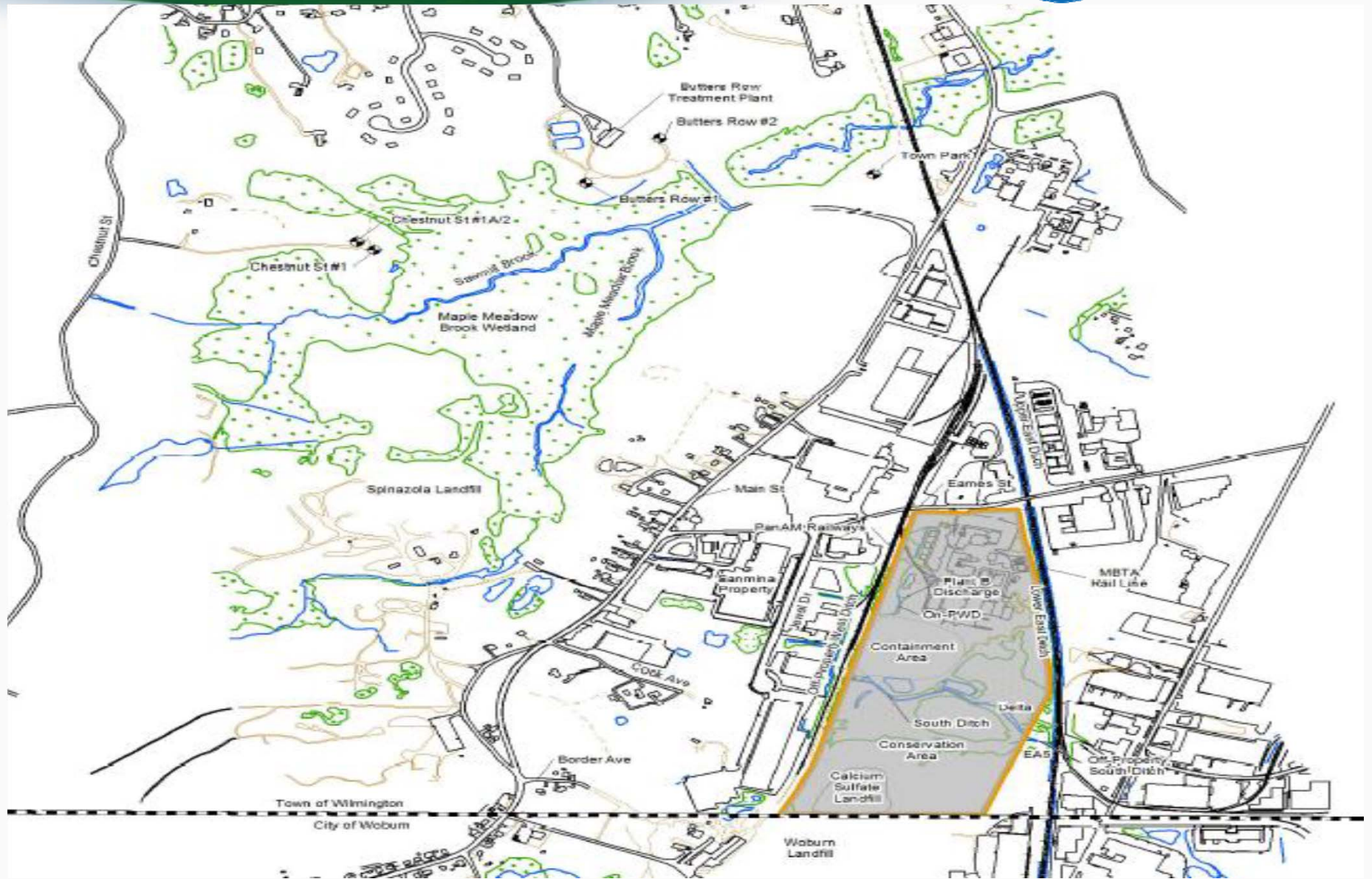
## Questions?

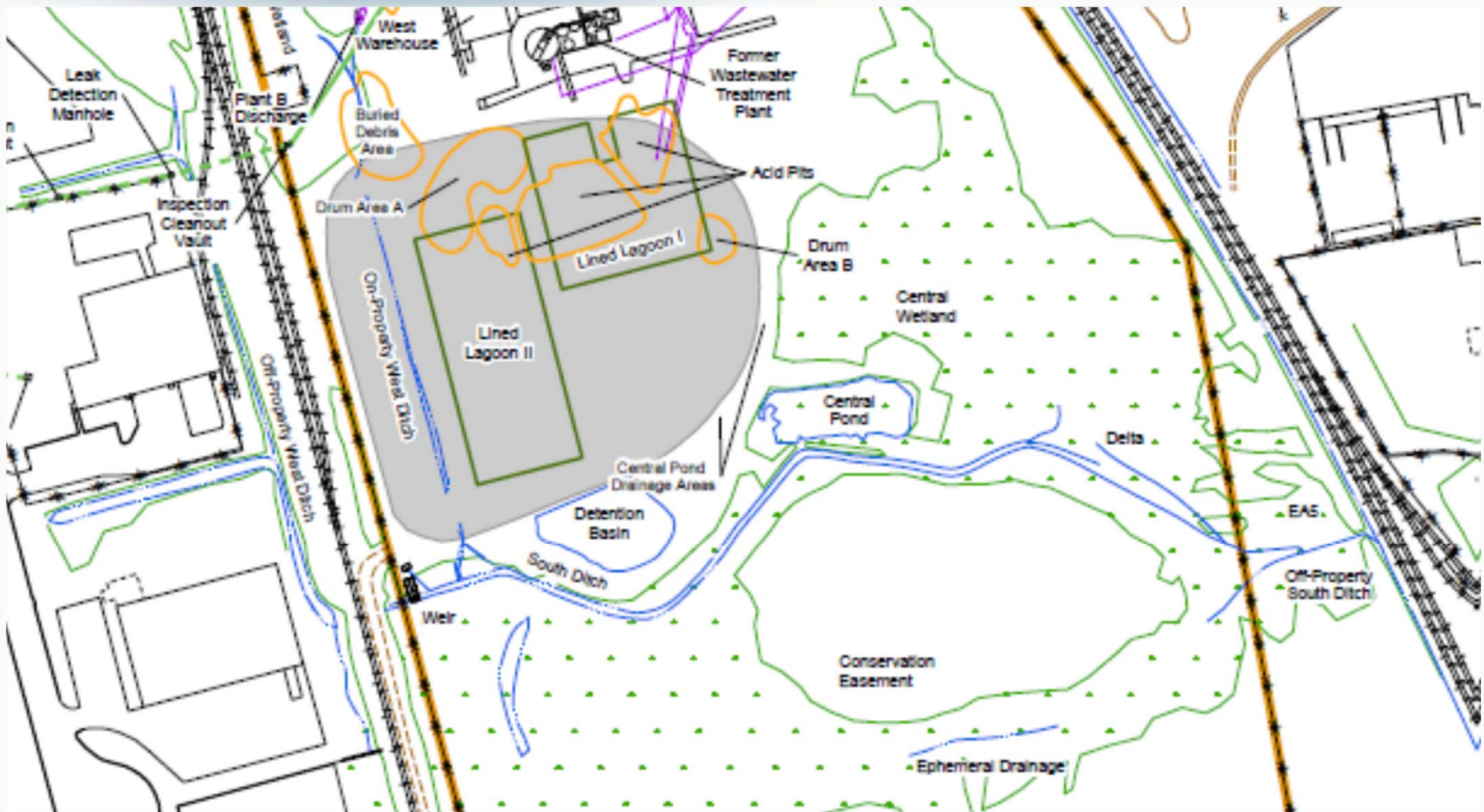
Contact information:

Lynne Jennings

617-918-1210

[Jennings.lynne@epa.gov](mailto:Jennings.lynne@epa.gov)





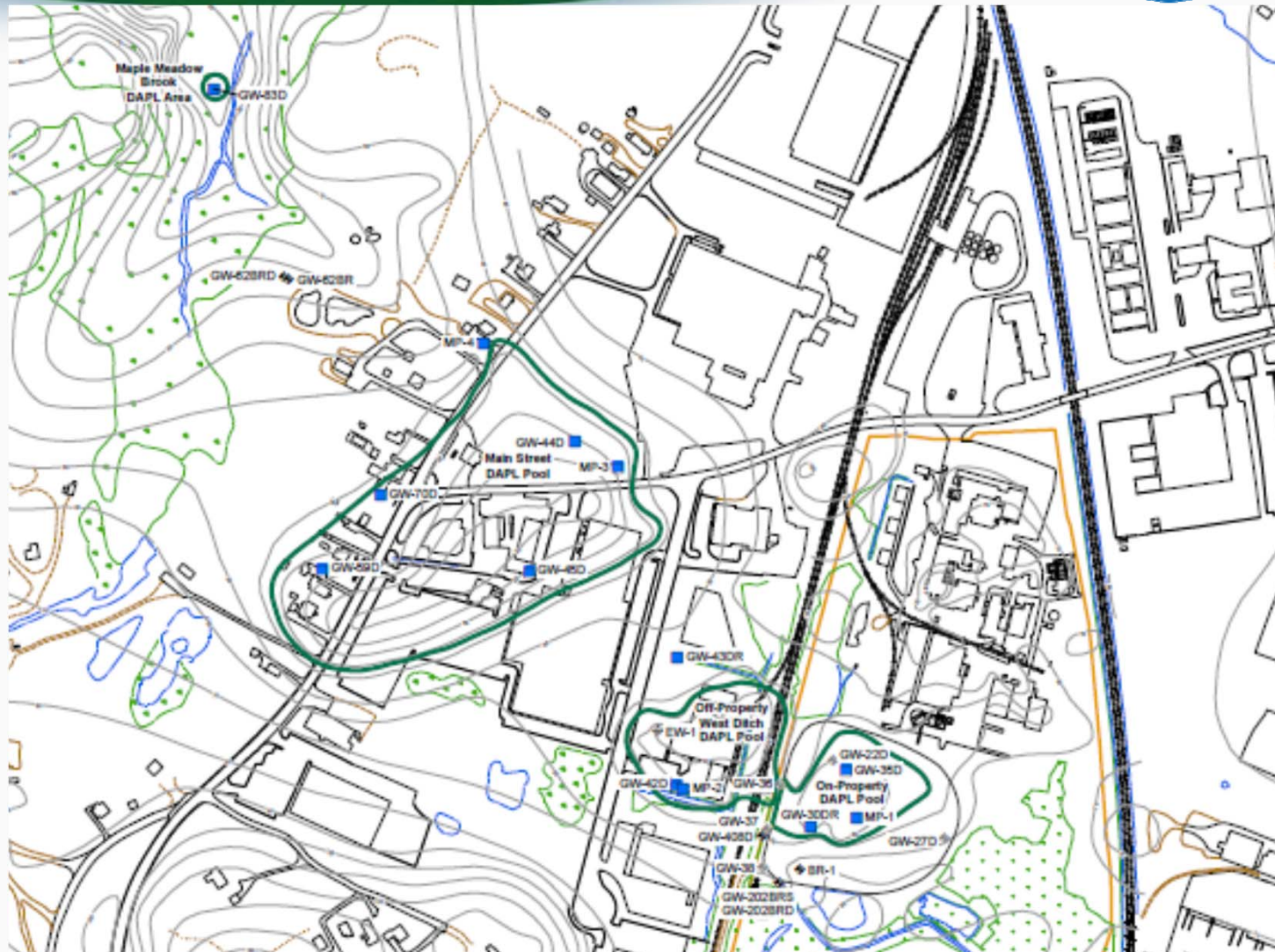




5/30/2019

U.S. Environmental Protection Agency

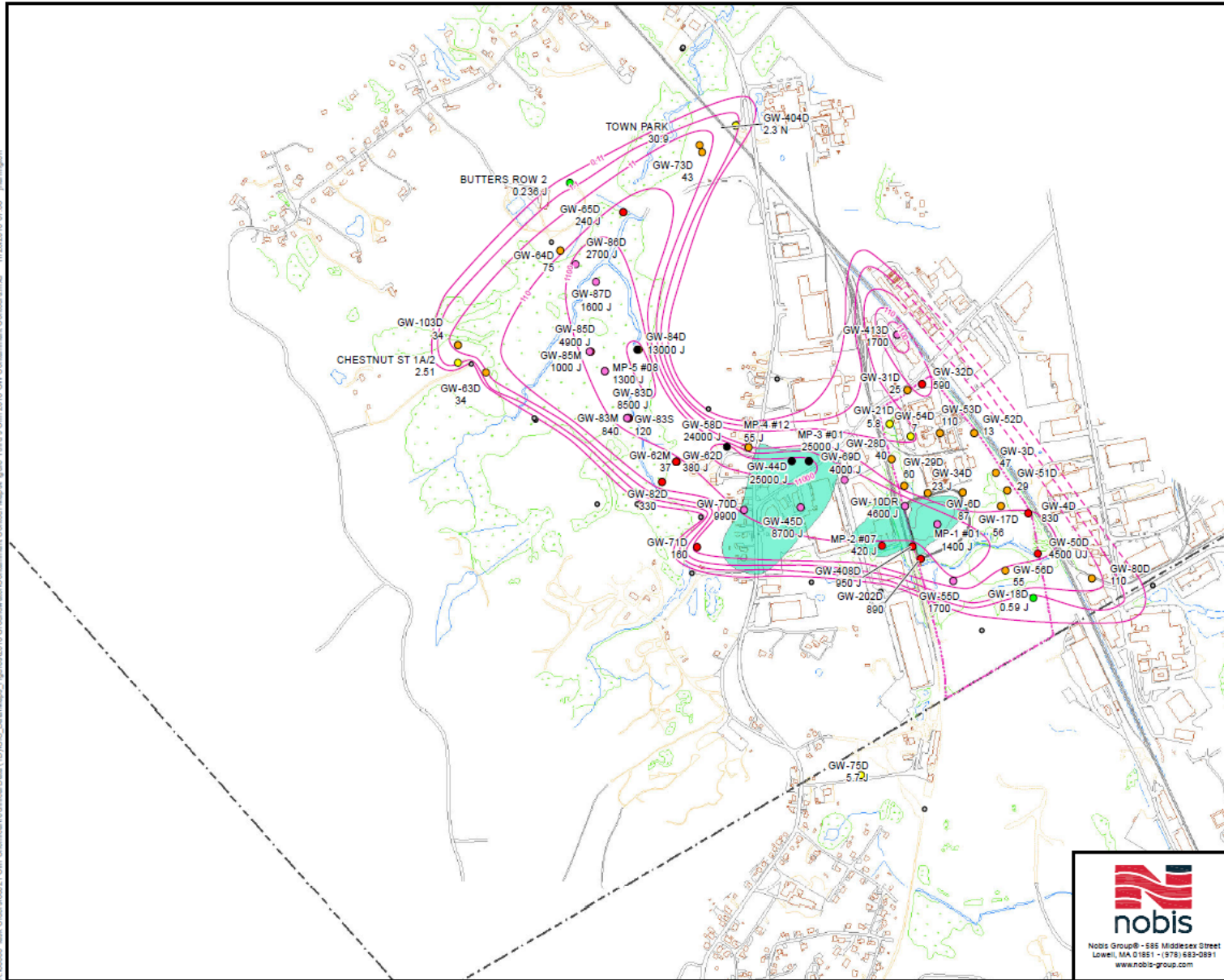
17



5/30/2019

U.S. Environmental Protection Agency

18



**Notes:**

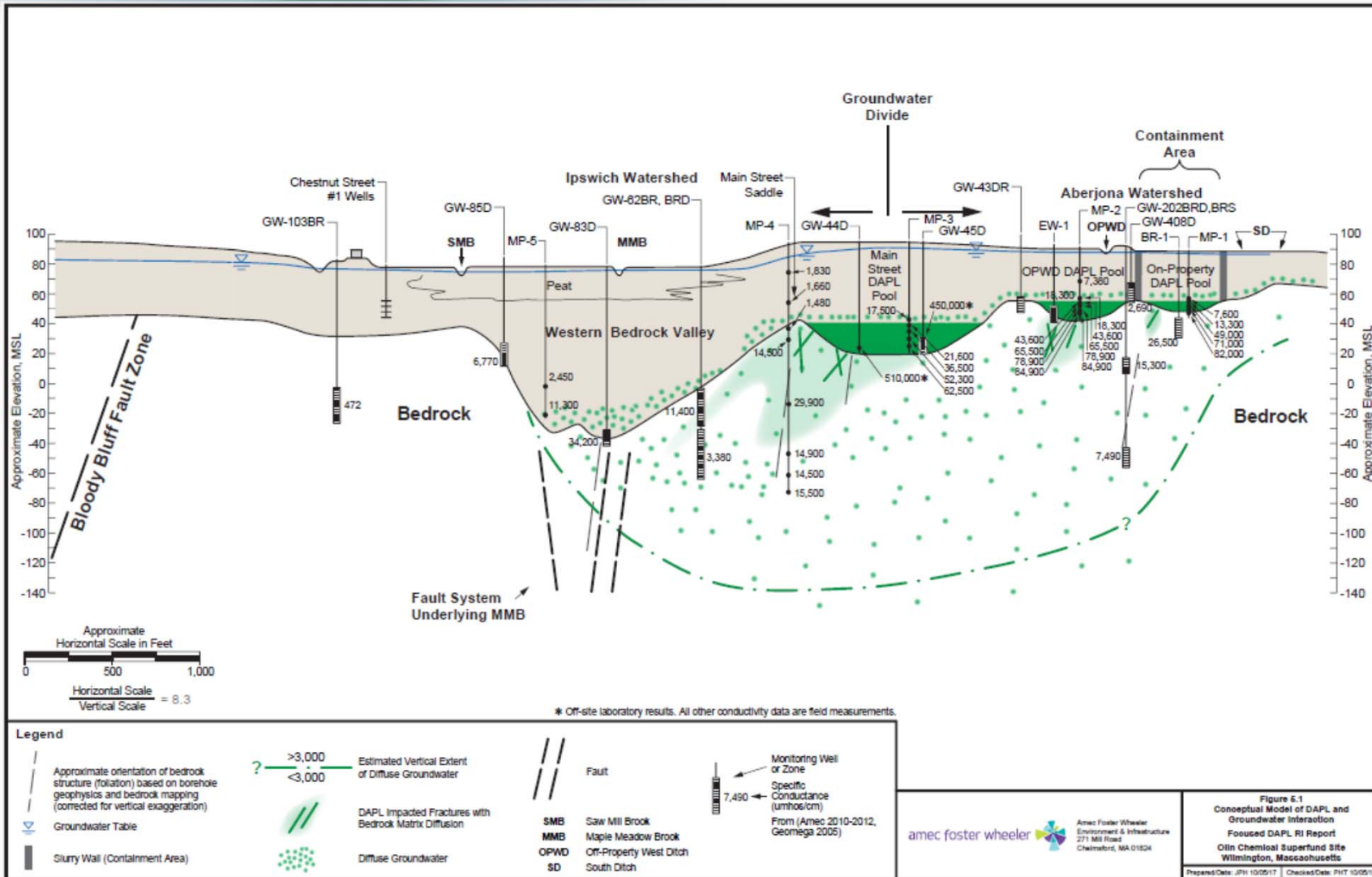
1. Maximum result from 2010-2017 sampling events is labeled.
2. All concentrations shown are in micrograms per liter (ug/L).
3. Locations of site features depicted hereon are approximate and given for illustrative purposes only.

**Legend**  
**NDMA in Deep Overburden**  
**Tapwater RSL = 0.11 ng/L**

- < Reporting Limit
  - 0.11 - 1.1
  - 1.1 - 11
  - 11 - 110
  - 110 - 1,100
  - 1,100 - 11,000
  - 11,000 - 110,000
  - NDMA Isocentration Contour
  - - - Inferred NDMA Contour
  - DAPL Pools
  - Paved Road
  - Unpaved Road
  - Rail
  - Site Boundary
  - Water Features
  - Buildings
  - Wetlands
- 0 400 800 1,600  
 Feet  
 1 inch = 800 feet



<b>FIGURE 6B</b>	
NDMA IN DEEP OVERBURDEN GROUNDWATER OLIN CHEMICAL SUPERFUND SITE WILMINGTON, MASSACHUSETTS	
PREPARED BY: JH	CHECKED BY: JL
PROJECT NO. 80021	DATE: NOVEMBER 2018



5/30/2019

U.S. Environmental Protection Agency

20

