July 25, 2012

Grant Wilk
Wilk Environmental
378 Bentleyville Road
Chagrin Falls, OH 44022

Dear Mr. Wilk:

Here is the final Declaration and Decision Document for the former Chem-Masters facility property in South Russell, Ohio. Staff at Ohio EPA, Division of Environmental Response and Revitalization (DERR), issued a Statement of Basis seeking public input on the proposed remedies on January 26, 2012. The Agency received no comments concerning the Statement of Basis and, as such, the responsiveness summary is unnecessary.

Since the proposed remedies appear to comply with applicable hazardous waste rules, the Declaration and Decision Document represent the selected remedy for the Former Chem-Masters facility, in accordance with the policies of Ohio EPA and the statues and regulations of the State of Ohio.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director’s action. The appeal must be accompanied by a filing fee of $70.00, made payable to “Treasurer, State of Ohio” which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General’s Office, Environmental Enforcement Section.
An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
77 South High Street, 17th Floor  
Columbus, Ohio 43215

If you have any questions concerning the Corrective Action remedies selected please call Harry Courtright of Ohio EPA’s Northeast District Office at (330) 963-1200.

Sincerely,

Brian Dearth  
Management Analyst Supervisor  
Division of Materials Waste Management (DMWM)

cc: Ed Lim, Manager, DERR, CO  
    Harry Courtright, DERR, NEDO  
    John Palmer, DERR, NEDO  
    File
DECLARATION

SITE NAME AND LOCATION

Techtonics Developers LLC
Former Chem-Masters Corporation Facility (Chem-Masters)
477 Industrial Parkway
South Russell, Ohio (Geauga)

STATEMENT OF BASIS AND PURPOSE

This Decision Document presents the selected remedial actions for Chem-Masters in accordance with the policies of the Ohio Environmental Protection Agency, statutes and regulations of the State of Ohio.

ASSESSMENT OF THE SITE

Chem-Masters' primary business included formulating and blending chemical additives and surface coatings for concrete and masonry. From 1980 through 1987 Chem-Masters had several incidents which resulted in impacts to soil and/or groundwater. Ohio EPA found that the implementation of the selected remedies will protect public health and the environment by permanently reducing risks to acceptable levels and the remedies have been completed.

DESCRIPTION OF THE SELECTED REMEDIES

Remediation activities at the site consisted of:

- Removal and clean confirmation sampling of all soil contaminated with hazardous materials
- Enhanced bioremediation of contaminated ground water
- Ground water monitoring and confirmation sampling

Successfully completed remediation efforts and confirmatory sampling support the need for NO FURTHER ACTION at this site.

STATUTORY DETERMINATIONS

Today's selection and required implementation of remedial actions is protective of human health and the environment, is in accordance to applicable State and federal laws and is responsive to public participation and input. The remedies utilize permanent solutions, to the maximum extent practicable, to reduce toxicity, mobility and volume of hazardous substances at Chem-Masters. The effectiveness of the remedies will be reviewed regularly.

Scott Nally
Director
Decision Document for the Remediation of
Former Chem-Masters Facility
477 Industrial Parkway
South Russell
Geauga County
OHD 004 203 675

Prepared By
The Ohio Environmental Protection Agency
July, 2012
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1.0 INTRODUCTION

1.1 Executive Summary

Ohio Environmental Protection Agency (Ohio EPA) has prepared this Decision Document for the remediation of the Former Chem-Masters Facility, in South Russell, Ohio. This Decision Document identifies Ohio EPA's selected remedies, and explains the reasons for the selection of the remedies.

Under the Resource Conservation and Recovery Act (RCRA), the Corrective Action program was created to address threats to human health and the environment from historic or past waste management areas at RCRA treatment, storage or disposal facilities (TSDF).

Chem-Masters' primary business included formulating and blending chemical additives and surface coatings for concrete and masonry. During its operations, Chem-Masters had several incidents which resulted in impacts to soil and groundwater.

To address the facility's Corrective Action requirements, Chem-Masters entered into a consent agreement on January 25, 1991, and conducted extensive soil and groundwater sampling at the site. Tectonics Developers LLC, subsequently purchased the site in August, 1998, and initiated voluntary remediation of the property. A summary of the facility investigations by Chem-Masters and Tectonics is presented in Section 3.

Ohio EPA has reviewed Chem-Masters' submittals that document the results of the facility investigation and previously available information, and has found that the implemented remedies have adequately remediated the site.

In brief, Remediation activities at the site consisted of the following:

- Removal and confirmation sampling of all soil contaminated with hazardous materials
- Enhanced bioremediation of contaminated ground water
- On-site ground water monitoring, and sampling of off-property residential private water supply wells.

A summary of the remedies is discussed in Section 5. Ohio EPA finds that these remedies are protective of public health and the environment. No further action is required.
1.2 How the Corrective Action Process Works

The initial step in the Corrective Action process for facilities regulated under RCRA is site characterization or investigation to define the nature and extent of contamination at the facility. The information collected supports the selection and implementation of a remedy or remedies. This step culminates with the facility's submission of a report summarizing the investigation data, and possible remedies focused on addressing site-related contamination. Reports submitted by Chem-Masters and Tectonics were reviewed and approved by Ohio EPA.

In the next step of the Corrective Action process, Ohio EPA generates a Statement of Basis which summarizes Ohio EPA's preferred remedies for the facility. This document is then made available to the public for review and comment. Ohio EPA issued the Statement of Basis for the Chem-Masters, South Russell, Ohio site on January 20, 2012. This document was made available to the public at the Ohio EPA's Northeast District Office, at 2110 East Aurora Road, Twinsburg, Ohio to review and comment on from January 26, 2012, until March 19, 2012. Ohio EPA did not receive any comments during the comment period.

After the Public Comment period, Ohio EPA then issues a Decision Document. This document meets that purpose and is the Decision Document for the Chem-Masters, South Russell, Ohio site.

2.0 SITE HISTORY

The subject property, located at 477 Industrial Parkway, South Russell, Ohio, currently owned by Tectonic Developers, LLC (Tectonics), was previously owned by the Chem-Masters Corporation from 1959 to 1991. The site consists of a one acre lot with a 14,800 square foot masonry building. It is located in a light industrial park with other light industry to the north, west and east. A marshy area lies at the southwest corner of the site and the area immediately to the south of the facility is wooded.

Chem-Masters' primary business included formulating and blending chemical additives and surface coatings for concrete and masonry. From 1980 through 1987 Chem-Masters had several incidents which resulted in impacts to soil and groundwater. These include the following:

- July 1980 - Spillage of a regulated material on a storage dock area
- January 1985 – A ruptured pipeline resulting in the release of approximately 200 gallons of petroleum naphtha
• May 1986 - Chem-Masters employees disposed of 20 barrels of wash down wastewater (including petroleum naphtha, trichloroethylene, and tetrachloroethylene) by dumping the barrels on the ground directly south of the rear parking area.

Also, impacts to soil and ground water resulted from the regular discharge of wastes out the west side of the building from 1959 to 1984.

The president of the facility was convicted in the Court of Common Pleas, Geauga County, of criminal charges stemming from the May 1986 dumping. The corporation entered a plea of no contest. Subsequently, Ohio EPA, through the Attorney General’s Office, filed a civil complaint seeking to enforce the Ohio Hazardous Waste (Chapter 3734) and Water Pollution (Chapter 6111) statutes and rules. After negotiations, the parties entered into a consent agreement. In short, the consent decree required the facility to lawfully remove all hazardous materials, and to establish a Liquidation Trust Agreement to compensate Ohio EPA for expenses incurred by remedial activities at the site.

The hazardous materials were removed, but the trust fund assets were insufficient to address the contamination. In about 1992, Chem-Masters ceased as an on-going business concern and the liquidation trust was terminated. In June 1998, the bank foreclosed the mortgage. In August 1998, Tectonics purchased the property and began a voluntary remediation program.

3.0 SUMMARY OF THE FACILITY ASSESSMENT

As a result of the incidents and discharges, sampling at the Chem-Masters site was conducted by consultants for Chem-Masters, an Ohio EPA contractor, Ohio EPA staff, and by Tectonics, the current facility owner. They installed a total of nineteen ground water monitoring wells and extracted fifteen soil borings to characterize subsurface conditions, and delineate the lateral and vertical extent of soil and ground water contamination. The field activities were conducted at various intervals from 1986 through 1992 and are described in the RCRA Facility Assessment prepared for the Ohio EPA by URS Consultants in September 1993. This report describes the history of the facility and includes copies of the analytical data generated from soil and ground water sampling, as well as boring log reports. Analytical results of soil and ground water sampling are presented in the previously referenced documents. Additional confirmatory soil sampling was conducted in October 2011.

Contaminants of Concern (COCs) consisting of petroleum naphtha and chlorinated solvents from the various releases that occurred at the facility from 1959 to May of 1986
were present in the ground water on the site in concentrations that exceeded the US EPA's Maximum Contaminant Levels (MCLs). The on-site ground water contamination was limited to the upper portion of the Sharon Sandstone, which is the uppermost aquifer.

To the south and southwest of Chem-Masters is the Stony Ridge Colony housing subdivision. Each of the residences in this subdivision has a private water supply well. The residential wells were sampled on several occasions from 1985 to 2006. No contamination associated with the site was ever detected in any of the private residential wells sampled.

3.1 Site Wide Ground Water Evaluation Criteria

The US EPA's Maximum Contaminant Levels (MCLs) for drinking water were used to evaluate whether remediation was effective.

3.2 Site Wide Soil Evaluation Criteria

Soil remediation in 1980, 1986 and 1988 used non-detect as a standard for determining that remediation was completed. October 2011 confirmation soil samples used the Ohio EPA's Voluntary Action Program (VAP) Direct Contact Soil Standards for Residential land use (Ohio Administrative Code 3745-300-08).

4.0 REMEDIAL ACTIVITIES

The TCE Soil contamination that was initially present from the outdoor loading dock release of July, 1980 was removed by October, 1980.

From July to November 1986, the area south of the rear parking lot where 20 barrels of waste were dumped was excavated to the bedrock, and 215 cubic yards of contaminated soil removed and disposed. Confirmation sampling from the walls of the excavation cavity verified that no COCs remained in the soil. Additional confirmation sampling was conducted in October 2011, and also verified that the contamination was no longer present in excess of the VAP Direct Contact Residential soil standards.

Prior to 1988, contaminated soil was removed by Chem-Masters from the discharge trench west of the building. Confirmation samples from October 2011 verified that no contamination remained in excess of the VAP Direct Contact Residential soil standards. In April 2000, Tectonics removed and disposed 36 tons of contaminated soil from the ruptured pipe area.
Tectonics' remediation program also treated the ground water with bacterially enhanced solutions to improve the in-situ biological remediation of the ground water, removed impacted soil in the vicinity of the pipeline rupture and monitored ground water. By April 2011, all contaminants of concern in the ground water were below the maximum contaminant levels (MCLs) established by the USEPA for drinking water. Additional confirmatory sampling was conducted in October 2011, which showed residual contamination well below residential use standards. The monitoring wells have since been properly removed and sealed.

5.0 OHIO EPA'S FINAL SELECTED REMEDY

Ohio EPA has reviewed data and reports assessing the site and detailing remedies already implemented. Contamination from the property no longer poses a threat to human health or the environment. No institutional or engineering controls or additional monitoring are required. Ohio EPA has determined that the voluntary remedial activities taken by Tectonics have fulfilled the substantive requirements of closure, post-closure and corrective actions.

Ohio EPA has reviewed recent confirmatory sampling results, document submittals and historical information, and is today proposing a remedy for public comment in order to address affected areas at the facility.

The selected remedy is: No Further Action.

Residual contamination of soil and ground water at the site meets unrestricted use and potable use standards. Further remedial action or institutional controls are unneeded. Prior remedial activities do not require on-going maintenance or monitoring to remain effective.

6.0 CONCLUSIONS

In conclusion, Ohio EPA's Evaluation of the Selected Remedies is NO FURTHER ACTION is necessary at this site.

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1 One monitoring well on the adjacent property was taken over by the neighbor, and is being used for non-potable production water. All other wells have been sealed.
PUBLIC NOTICE RECORD

Notification Type: HAZARDOUS WASTE FACILITY CLOSURE ACTION

Entity Info
Name: Tectonic Developers, LLC
Address: 477 Industrial Parkway
City/Township/Zip: South Russell, OH 44022
County: Geauga
Description: Hazardous Waste

Notice Info
☑ Weekly Review
☑ Public Notice
Date Of Action: 07/25/2012
Notification Number: OHD004203675

Receiving Waters:
Meeting Details:
Standard Remark:

Other Remark:
On July 25, 2012, the director of Ohio EPA issued the Final Decision Document Declaration for the former Chem-Masters site located at 477 Industrial Parkway, in South Russell, Ohio, Currently owned by Tectonic Developers, LLC. The EPA identification number for this facility is OHD004203675. This Decision Document Declaration presents the selected remedial actions for Chem-Masters in accordance with the Ohio EPA statutes and regulations of the State of Ohio. Remediation activities at the site consisted of: Removal and clean sampling of all soil contaminated with hazardous materials; Enhanced bioremediation of contaminated ground water; Ground water monitoring and confirmatory sampling. These successfully completed remediation efforts and confirmatory sampling support the need for NO FURTHER ACTION at this site.