From:	Fetcie, Katherine
To:	Finnegan, Ann
Subject:	FW: LANXESS - EPA Inquiry for 1020 King Georges Road, Fords, NJ (was "RE: Soil from 1000 Inman Avenue")
Date:	Monday, May 09, 2022 8:08:08 AM
Attachments:	Manifest 0257_001.pdf COC 460-214717 (202007311543).pdf SampDatasheet [Nj_Enhanced].pdf Petroleum Contaminated Soil with PCBs - IEC.pdf Location of concrete work.xlsx

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From: Ansari, Ramin <Ramin.Ansari@lanxess.com>
Sent: Saturday, May 7, 2022 1:02 PM
To: Fetcie, Katherine <Fetcie.Katherine@epa.gov>
Cc: Kirby, Lisa <Lisa.Kirby@chemtura.com>; Fetcie, Katherine <Fetcie.Katherine@epa.gov>
Subject: LANXESS - EPA Inquiry for 1020 King Georges Road, Fords, NJ (was "RE: Soil from 1000 Inman Avenue")

Ms. Fetcie:

In response to your questions below, we are providing the following information as a response to clarify any confusion.

As to your first paragraph:

- The manifest we have shows 59 drums, 49 of which were non-TSCA PCB contaminated soil or water.
- Please see attached return copy of the manifest.

As to your second paragraph and questions on manifests and the Weston relationship:

- Weston is performing PCB remediation work at the Lanxess site under a 2005 remediation agreement with LANXESS.
- Weston is performing their investigation/remediation under a 2005 risk-based PCB disposal approval from EPA.
- The source area in question is being addressed by Weston under the EPA approval, and in accordance with the Weston-LANXESS Remediation Agreement.
- The soil in question was generated as part of a LANXESS infrastructure improvement project, unrelated to remediation, where new concrete was installed after demolition, and soils were removed to make room for that new concrete.
- Because the soils that were removed appeared to be impacted, they were containerized, profiled, and disposed. The impacted soil is associated with the known PCB contamination on site discussed above.
- The infrastructure improvements were a LANXESS project, and since LANXESS initiated the soil removal, and it was not a part of remediation, LANXESS paid for the disposal of this excavated soil, and shipped it under a LANXESS manifest.

As to your third paragraph and questions about source location and concentrations:

- This location is part of AOC 4, as denoted by and being investigated/remediated by Weston under

the EPA approval noted above.

- Please see the attached figure that notes the location of the soil excavation and concrete work within the footprint of the Weston remediation work.
- Please see the attached profile, chain of custody, and analytical report for the excavated soils.

Ramin

Ramin Ansari, M.S., L.P.G. (Indiana)
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From: Fetcie, Katherine <Fetcie.Katherine@epa.gov>
Sent: Wednesday, May 04, 2022 3:59 PM
To: Ansari, Ramin <Ramin.Ansari@chemtura.com>; Kirby, Lisa <Lisa.Kirby@chemtura.com>
Cc: Finnegan, Ann <Finnegan.Ann@epa.gov>
Subject: RE: Soil from 1000 Inman Avenue

Oops!

I'm so sorry for putting the incorrect address in the subject line. I am referring to your 1020 King Georges Road site in Fords New Jersey.

From: Fetcie, Katherine
Sent: Wednesday, May 4, 2022 3:16 PM
To: ramin.ansari@lanxess.com; lisa.kirby@lanxess.com
Cc: Finnegan, Ann <Finnegan.Ann@epa.gov>
Subject: Soil from 1000 Inman Avenue

Mr. Ansari and Ms. Kirby,

Thank you for speaking with us today about certain remediation work conducted at the Lanxess facility in Edison, NJ. After reviewing a recent manifest from your site for 67 drums of PCB contaminated soil, we would like to clear up some issues that arose regarding the current work.

EPA is fully aware that there is currently an approved remediation going on at the site. However, the

responsible party for that work is Weston Solutions. Since these recent manifests for PCB waste have listed Lanxess as the generator, we would ask that you please explain this change. You may discuss any communication or agreement with Weston that may have occurred.

As part of your response, we would also ask that you identify the source of the waste involved. Please describe the exact location and situation of the PCB material, the source of PCB contamination if known, the concentration, and any inclusion in the approved remediation.

We appreciate your promptness in regards to this matter. If you have any questions on this matter, please feel free to contact me.

Katherine Fetcie
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