

US EPA ARCHIVE DOCUMENT

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Questions and Answers about BASF Corporation, 1000 Harvard Ave., Cleveland, Ohio

What is the history of the Site?

From 1905 to 1998, the Harshaw Chemical Company processed and manufactured chemicals at 1000 Harvard Avenue, Cleveland, Ohio (the Site). Harshaw also researched and enriched uranium for the U.S. Government from 1944 to around 1953. Due to the uranium enrichment program, the Site is included in the Department of Energy's Formerly Utilized Sites Remedial Action Program ("FUSRAP"). Due to releases of pollutants from chemical manufacturing, the Site is also under jurisdiction of the US Environmental Protection Agency's Resource Conservation and Recovery Act Corrective Action Program. Manufacturing ended at the Site around 1998. Since 2006, most of the property has been owned by the BASF Corporation. One part of the Site, Building G-1, is owned by the Chevron Corporation.

What are the environmental issues with the Site?

The U.S. Army Corp of Engineers (USACE), which administers the FUSRAP, has been investigating the radionuclide pollution at the Site and is responsible for addressing that pollution, pursuant to its jurisdiction. The USACE investigation is expected to continue until the USACE completes its remedial obligations.

On March 30, 2010, EPA's RCRA Program ordered BASF to investigate hazardous waste pollutants in all environmental media such as soil, groundwater, biota, surface water, and sediment under the Corrective Action program. If EPA determines that pollutant levels are not acceptable for the next intended use of the Site, such as another industrial development, EPA will order BASF to perform remedial actions such as soil excavation and disposal to lower the pollutant concentrations. BASF would also need to clean up polluted materials that moved off site.

Recently, EPA learned BASF was discharging water (effluent) from a pipe (outfall 007) on the Site to the Cuyahoga River. In late October 2013, EPA took samples of the effluent from outfall 007. All samples were shipped to the National Analytical Radiation Environmental Laboratory (NAREL) for analysis. The analytical results were completed in December 2013 and submitted to EPA in January 2014. A final report was completed in May of 2014. Analysis of the sampling data showed low levels of heavy metals and radioactive pollutants. Concentrations of radionuclides in the Cuyahoga River at the outfall were below drinking water standards.

What happens to the water when it gets into the river?

Additional sampling and analysis of the river water, sediment (river bottom), and the shoreline soil near the outfall is needed to fully characterize the amount and extent of contamination and where it may have migrated. On August 29, 2014, EPA issued a Request for Information to BASF requiring it to commence monitoring, sampling, analysis and the reporting of pollutants being discharged from any point source on the Site into the Cuyahoga River and Big Creek.

Where did the metals come from and how are they getting to the Cuyahoga River?

The USACE found elevated levels of uranium in the soil, ground water, and sewer pipes at the northeast part of the Site under and around Building G-1. The pollutant and water source investigations are

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ongoing. EPA suspects that groundwater had been infiltrating into the sewer pipes beneath and around Building G-1 and then transported to the river through the outfall pipe.

Are there any Health and Safety Impacts to the Public?

The analysis of the outfall sampling data completed for EPA in May 2014 showed low levels of heavy metals and radioactive pollutants. The nearest source of drinking water is Lake Erie, which is about four miles downstream, to the north. There are no known private drinking water wells in the vicinity. Additional sampling of the river water, sediment (river bottom), and the shoreline soil near the outfall are needed to fully characterize the contamination and where it may have migrated.

What is EPA doing to address the Cuyahoga River discharge?

After EPA completed its preliminary investigation in May 2014, it notified BASF that it was out of compliance with the Clean Water Act by discharging pollutants into the Cuyahoga River without a National Pollutant Discharge Elimination System (NPDES) permit. Without a NPDES permit, BASF is not permitted to discharge pollutants, even at the low levels found at the outfall. EPA then attempted to negotiate with BASF to stop the discharge of effluent into the Cuyahoga River. Those efforts were unsuccessful. On August 29, 2014, EPA issued a Request for Information to BASF requiring it to commence monitoring, sampling, analysis and the reporting of pollutants being discharged from any point source on the Site into the Cuyahoga River and Big Creek. On October 8, 2014, EPA unilaterally ordered BASF to cease the discharge of all pollutants from any point source into any navigable water of the United States.

By October 17, 2014, BASF stopped the effluent discharge from Outfall 007 and a second outfall into the Cuyahoga River. On October 20, 2014, EPA verified that these actions were completed. As of October 21, 2014, BASF continues with its plan to remove the entire associated storm water sewer system by November 30, 2014.

In the next several months, BASF intends to raze all but one of its buildings at the Site. The USACE intends to raze Building G-1 during the same time-frame. BASF will then complete its investigation of pollution at the Site. The USACE will continue its FUSRAP Remediation beneath and around Building G-1 and potentially other areas of the Site to address radionuclide pollution.

Additional information can be found at <http://www.epa.gov/region5/cleanup/rcra/basf/index.html>