



Maine Department of Environmental Protection

RCRA Corrective Action Program

Statement of Basis

**the former MicroMetrics/Aeroflex Facility
12 Industrial Park Rd, Rockport, Maine
September 2009**

Based upon field investigations conducted at the 12 Industrial Park Rd. property in Rockport, Maine, and a review of data compiled from inspections and from MicroMetrics (formerly Knox Semiconductor), the Maine Department of Environmental Protection (MEDEP) is announcing a proposed determination that no further corrective action is necessary for this facility.

I. INTRODUCTION

Investigations at the site have demonstrated that all known hazardous materials have been removed and no threats remain to human health or the environment. The determination is based upon activities conducted by MicroMetrics and supporting documentation by the MEDEP.

This document summarizes the various activities and investigations undertaken at the site, the results of these activities, and the reasons for no further corrective action at the site. MEDEP published a public notice with the Herald Gazette at the end of August, 2009 summarizing the information and proposed remedy and inviting public comment and review of the project file. No public input was received during the 30 day comment period.

This Statement of Basis is intended to:

- Include a brief history of the facility, and a review of investigative and closure activities performed;
- Explain the opportunities the public had to comment on the proposed action and the availability of further information for public review;
- Present MEDEP's rationale for proposing No Further Action related to the closure of the facility.

II.

BACKGROUND

A. Facility History

The former Knox Semiconductor/MicroMetrics/Aeroflex facility in Rockport, Maine, operated under Interim License #I-032 as a hazardous waste storage facility. MicroMetrics obtained EPA ID# MED071730220. Mistakenly, this site also operated with the EPA ID# MED981063662. Although this facility was always at the same site, a new mailing address is to blame for the confusion regarding EPA ID #s. This site address used to be considered 13 ½ Quarry Road.

Knox Semiconductor/MicroMetrics was a diode manufacturer that employed about 31 people in a 7200 square foot building from approximately 1975 to 2007. Aeroflex purchased the facility around 2007 and operations at the site were relocated in Londonderry, NH. The facility in Rockport served the Defense Industry as well as the commercial electronic component market. A diode regulates the amount of voltage or current that is passed through it and is used in all types of electronic equipment. This semiconductor devices manufacturing facility was located directly adjacent to the Rockport Solid Waste Transfer Station and also P.G. Willey and Company Fuels.

The Interim License listed the following hazardous wastes handled in the facility:

- organics such as xylene (F003, toxic), isopropyl alcohol (D001, ignitable), and perchloroethylene (F001, toxic),
- mineral acids such as sulfuric, nitric, hydrofluoric, hydrochloric, phosphoric, etc.,
- plating baths such as silver cyanide, gold cyanide, and lead fluoborate,
- diffusion sources such as boron tribromide and phosphorus oxy-chloride, and
- gases such as hydrogen.

Eventually the facility was able to neutralize the acids, therefore being able to dispose of them into the sewer, with an agreement with the local POTW.

On 10/12/1985 an electrical fire damaged the facility. Many chemicals in the chemical room were still in their containers. Those which were lost were presumable consumed in the fire, according to the DEP spill report. Water samples were taken of the runoff and no volatile organic compounds were detected at an estimated detection limit of 10 ug/L. The hazardous waste storage room, before the fire, was 10 feet by 12 feet, bermed, with a concrete base. No other spill reports were identified for this site. The building was rebuilt.

B. Regulatory History

Knox Semiconductor was granted an Interim License for a hazardous waste storage facility on September 24, 1980 by the Maine Board of Environmental Protection. This license was closed on July 10, 1985 after this facility requested conversion to generator-

only status and inactivation of its interim license. Under generator-only status the maximum inventory of containers containing hazardous waste was approximately four 55-gallon drums at one time.

In 1993 Knox Semiconductor applied to the MEDEP for a license by rule for reclamation of solvents by distillation. Knox planned to reclaim 20 gallons/month perchloroethylene, 10 gallons/month isopropanol alcohol, and 10 gallons/month xylene. DEP License #O-0119-HL-A-N was issued June 11, 1993.

MEDEP completed a RCRA Facility Assessment (RFA) in 1995, which summarized the sites operations, hazardous waste management, environmental setting and solid waste management units (SWMUs). The chemical storage room and an outside storage area were listed as the only SWMUs. There was no evidence of spills or discharge. The RFA is the first of multiple phases of the corrective action program. Because no contamination was suspected, a RCRA Facility Investigation, phase two investigation, was not required.

When this facility shut down in 2007, it went through a formal generator closure as is summarized in a report by Ransom Environmental Consultants, Inc., dated October 31, 2007. Hazardous wastes, universal wastes, and remaining chemicals were removed by Clean Harbors on October 4, 2007. The sinks and associated piping were evaluated and after determining that residual liquid was non-toxic, they were removed and properly disposed of. A stained chemical storage cabinet and a plastic layer on shelves in the chemical storage were removed and properly disposed of. The neutralization tank was neutralized, flushed and dried by Clean Harbors. Ransom conducted a final inspection of the cleanup and closure activities on October 16, 2007.

C. Site Inspections – Activities Prior to Closure

On March 28, 1985 MEDEP staff inspected the facility and observed no visual signs of hazardous waste spills or discharges.

On April 16, 1985, Shawn S. Small of Civil Engineering Services (State of Maine Registered Professional Engineer #3190) certified that Knox Semiconductor was operating as a generator only with hazardous wastes being transported off site for disposal or recycling within 90 days, and that no evidence of spills or leaks were noted in the hazardous waste storage area during his inspection.

June 2000, Jim Rogers of MEDEP toured facility.

June 2000, Brian Kavanah and Peter Blanchard of MEDEP visited site.

February 2001, Dan Granz of EPA inspected facility.

June 2003, Jim Rogers and EPA visited site.

June 16, 2004, Mary Corr of MEDEP conducted a hazardous waste management inspection.

III. PUBLIC COMMENT AND REVIEW

Public comment has been integrated into the decision making process throughout the regulatory involvement. As part of the proposed no further action remedy, public notice was published in the Herald Gazette on August 29, 2009. The public was invited to contribute written or verbal comment, and to review the files in question. No input was received from the public during the 30 day comment period.

Public comment was also invited when the facility was closing out its interim status. The availability of the Final Closure Plan was public noticed in the Camden Herald and the Rockport Courier Gazette on March 28, 1985. No public comments were received. The Closure Plan and project files have been available for public review at MEDEP throughout the regulatory process. Also, Knox published public notice of its application to MEDEP to operate a solvent distillation unit on March 25, 1993 in the Courier Gazette. No public comments were received by MEDEP.

Members of the public may review the documents in question by appointment by contacting MEDEP at:

Maine Department of Environmental Protection
Fileroom
17 State House Station
Augusta, Maine 04330-0017
Ph.: 207-287-2651

IV. FINAL REMEDY PROPOSAL

MEDEP proposes, based upon all available information, that a No Further Action (NFA) remedy is appropriate for the MicroMetrics site in Rockport, Maine. MEDEP would reserve the right, however, to require further Corrective Action if contamination resulting from MicroMetrics activities is discovered in the future.

In 1983 MEDEP notified Knox Semiconductor that a Closure Plan was required. Following receipt of all required information, the Closure Plan was accepted by MEDEP in 1985. The Closure Plan met the requirements of Chapter 855, Section 9 of the Maine Hazardous Waste Management Rules, and the Interim License was terminated.

MEDEP published a public notice summarizing the site history and proposed remedy and initiating a public comment period of thirty days. The public comment period ended on September 30, 2009 with no comments or concerns regarding this proposed decision.

Rationale for NFA Determination

Based upon Department knowledge of the site, the former MicroMetrics site in Rockport, Maine does not pose a threat to human or environmental health, or to groundwater quality. No sources of environmental contamination related to MicroMetrics activities remain at the site. The building was certified free of contamination by a Maine registered P.E. Hazardous wastes, universal wastes, and remaining chemicals were removed by Clean Harbors on October 4, 2007. The sinks and associated piping were evaluated and after determining that residual liquid was non-toxic, they were removed and properly disposed of. A stained chemical storage cabinet and a plastic layer on shelves in the chemical storage were removed and properly disposed of. The neutralization tank was neutralized, flushed and dried by Clean Harbors. Ransom conducted a final inspection of the cleanup and closure activities on October 16, 2007. There are no records of releases to the environment during MicroMetrics operation and closure. The site is located in an area of long-term industrial/commercial activity and the surrounding properties are using a public water supply. No additional sources of contamination remain related to the MicroMetrics facility.

1. The NFA remedy addresses the general standards in Section 264.525(a) of Proposed Subpart S, meeting the overall requirements for an effective remedy:
 - i. Overall protection: The remedy provides protection for human health and the environment through three factors already in place. First, the building utilized by the former facility has been cleaned and certified free of contaminants by an independent professional engineer. Second, there are no spills or releases to the environment on file. These factors reduce or eliminate the chances for future contamination related to past site activity. Finally, in the site's current use, ground water around the site is not withdrawn for drinking water purposes, further reducing risks to the public.
 - ii. Attainment of Media Cleanup Standards: The site has never warranted monitoring of ground water, so there are no cleanup standards to meet. Available soil data documents no contaminants of concern.
 - iii. Controlling Sources of Release: There were no reported releases to create ground water or soil sources of contamination. The building was cleaned so it presents no risk as a future source.
 - iv. Compliance with Waste Management Standards: All wastes remaining from MicroMetrics operations were manifested and removed. MicroMetrics operations ceased, and control of the property has turned over to a new owner,

so there are no ongoing waste management issues related to the MicroMetrics facility.

2. The NFA remedy also meets the remedy decision factor criteria of section 264.525(b):

- i. Long-term Reliability and Effectiveness: The facility infrastructure has been cleaned, and certified free of contaminants. The site is in an area of commercial/industrial development, and there is a public water source in use in the surrounding communities. These factors reduce or eliminate the likelihood of future contamination issues or impacts to the environment from MicroMetrics activities.
- ii. Reduction of the Toxicity, Mobility, and Volume of Waste: This reduction has already been accomplished through the removal of drummed wastes, and the cleaning of the building utilized by MicroMetrics. No soil or ground water issues are known to exist.
- iii. Short-term Effectiveness: It is effective in the short term, because there are no known threats to human health or the environment. The site is in a historically industrial area, and public access and potential exposure is minimal.
- iv. Implementability: The Interim License issued by the Maine Board of Environmental Protection has been terminated. There are no other licensed or permitted MicroMetrics operations being conducted at the site, so the remedy is implemented by an adjustment to the site status.
- v. Cost: There is little or no cost associated with the proposed remedy. There is no information available to support a need for additional sampling of soil or groundwater at the MicroMetrics site, or justification for long-term monitoring.

In summary, the Maine Department of Environmental Protection has made a determination that a No Further Action remedy is appropriate for the former MicroMetrics site in Rockport, Maine. The remedy addresses the general standards and decision factors outlined in Sections 264.525(a) and 264.525(b) of proposed Subpart S for RCRA facilities requiring corrective action. No public comment was received following the August, 2009 public notice regarding this Statement of Basis.

The proposed No Further Action remedy is appropriate for the MicroMetrics site for the following reasons:

- 1. The site poses little or no threat to human health or the environment, there is no record of past releases to the environment, and the facility's building was cleaned and certified free of contaminants.

2. There is no activity ongoing related to the facility, so there are no future sources, handling of wastes, or cleanup standards to consider.

MEDEP recommends USEPA endorse our proposed NFA remedy as the best option for the MicroMetrics, Rockport site.