

Clariant Corporation
Mt. Holly Plant

P.O. Box 669246
Charlotte, NC 28266
704.827.9651



8EHQ-0697-13950

June 5, 1997

Sent Via Emery Overnight

Document Control Office (7407)
Attention: TSCA Section 8(e) Coordinator
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
401 "M" Street, S.W.
Washington, D.C. 20460-0001

Contains No CBI

Re: TSCA Section 8(e) Policy Statement, Part V(b) (43 FR 11110) - Notification of Discovery of PCB Soil Contamination
Clariant Corporation - Mount Holly Facility ("Clariant")
EPA Identification Number NCD001810365

RECEIVED
OPPT NCIC
57 JUN 11 AM 9:21

Dear Sir:

This notification is being submitted in accordance with Part V(b) of the Section 8(e) Policy Statement of the Toxic Substances Control Act (TSCA). In this particular situation, Clariant is unsure as to whether an 8(e) notification is actually required. Nevertheless, in the interest of being forthright and prudent, Clariant is submitting this Section 8(e) notification for a previously unsuspected distribution of PCB's in environmental media.

In late-March of this year, Clariant repaired a stormwater drainage culvert and line which had been clogged. In this repair, some soils were removed from the area to facilitate the repair and allow proper drainage. A total of approximately eighty-nine (89) tons of soil were removed. During the repair, a solvent odor was noticed in the soils; therefore, the soils were stockpiled until they could be further tested. The potential contamination of these soils was initially reported to the Division of Solid Waste Management of the North Carolina Department of Environment, Health, and Natural Resources (NCDEHNR) as a "RCRA Area of Concern" on March 26, 1997.

Samples were taken from the excavated pile and sent to General Engineering Laboratories, Inc. (Charleston, South Carolina) for analysis. On May 15, 1997, Clariant received laboratory results which revealed PCB contamination in the soils excavated from the drainage culvert. On May 16, 1997 Clariant notified (via a telephone voice mail message) Alfreda Freeman of USEPA, Region IV of this discovery. An attempt was made to notify the EPA, Region IV 24-Hour Emergency Hotline; however, the operator did not record the spill since it was of a historical nature. The operator further instructed Clariant to notify Alfreda Freeman of the finding. Later in the afternoon of May 16, Verne George of USEPA, Region IV returned the call left for Alfreda Freeman and instructed Clariant how to proceed.

Mr. George stated that this incident (*i.e.*, the disturbance of the contaminated soils in the drainage feature) has caused Clariant to become an active PCB site and that Clariant would need to maintain the proper recordkeeping pursuant to 40 CFR 761. Mr. George also stated that since the actual source or date of the release of the PCBs contaminating the soils is not known, it would be treated as a pre-1987 PCB spill. Mr. George further instructed Clariant that it should dispose of the excavated soils within thirty days.



The soils excavated from the drainage feature were found to contain PCB-1260 and PCB-1242 as well as several other hazardous constituents. This PCB contamination was unforeseen and previously unsuspected. At this time the extent of the PCB contamination is not known. Clariant is planning to delineate the entire area for PCB contamination in the near future.

The four (4) grab samples taken from the excavated soil pile were analyzed for PCBs. Results of these analyses are shown in the table below.

	Sample #1 (µg/Kg)	Sample #2(µg/Kg)	Sample #3(µg/Kg)	Sample #4(µg/Kg)
PC B-1242	139,000	4,330	11,100	68,700
PCB-1260	54,400	2,390	6,990	17,800

On June 3, 1997, all of the excavated soils were sent to the U.S. Ecology, Inc. facility in Beatty, Nevada for disposal.

The following is the required information for the Section 8(e) report.

- (1) *Job title, name, address, telephone number, and signature of the person reporting and the name and address of the manufacturing, processing, or distributing establishment with which he is associated.*

Name: Victor B. Ethridge
Job Title: Senior Environmental Chemist
Address: Clariant Corporation
P.O. Box 669246
Charlotte, North Carolina 28266
Telephone Number: (704)822-2708

Name of the manufacturing establishment with which he is associated:

Clariant Corporation
11701 Mount Holly Road
Charlotte, North Carolina 28266
(704)827-9651

Mailing Address:

P.O. Box 669246
Charlotte, North Carolina 28266

- (2) *Identify the chemical substance or mixture (including, if known, the CAS Registry Number):*

Polychlorinated Biphenyls ("PCBs")
CAS Registry Number: 1336-36-3

In these particular soils specifically PCB-1242 and PCB-1260 were detected.

97 JUN 5 5 11 3:15
RECEIVED

- (3) *Summarize the adverse effects being reported, describing the nature and the extent of the risk involved.*

At this time the adverse effects and the nature and extent of the risk are unknown. The only fact available is that PCB contamination exists in the soils of this drainage feature. The extent of this contamination is not known; however, Clariant is contracting an environmental engineering firm to fully delineate the contaminated area. Clariant also will work very closely with EPA, Region IV in the delineation and these cleanup efforts.

Should you have any questions or need additional information, please do not hesitate to call me at (704)822-2708.

Sincerely,



Victor B. Ethridge
Senior Environmental Chemist

cc: Karim Pathan (NCDEHNR)
Blair Drum (Clariant)
Mike Teague (Clariant)
Gary Sanderson (Clariant)
Nick Altman (Clariant)
Chris Barnard (Clariant)

97 JUN -5 PM 9:15

RECEIVED

Best Available Copy