Damage Incident Analysis for the Identification and Listing of Wastes from the Production of Organic Dyes and Pigments

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1.0 Introduction

As required under the regulations for listing (§261.11(a)(3)(ix)), EPA considers whether damage cases indicate impacts on human health or the environment from improper management of the wastes of concern. EPA compiled damage incidents involving dye and/or pigment production wastes for a previous proposal,[1] and this report updates this information. The previous damage case report found eleven incidents that appeared to involve some kind of contamination from the mismanagement of dye and/or pigment production wastes. This update report summarizes the public comments on the damage cases previously reported and provides a brief update of these cases. In addition, this report presents the results of a current search of the Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS), which contains information on potential and actual Superfund sites.

Section 2 summarizes public comments concerning the eleven damage incident cases published in the "Environmental Damage Incidents for the Dye and Pigment Industry," Research Triangle Institute, August 1994, RTI Project No. 94U-5819-09. In addition, where available, a brief update on each site's status is provided. Update information was taken from Records of Decision (RODs), Five-Year Reviews, or site fact sheets prepared by EPA Regions.

EPA's Envirofacts data warehouse was queried to identify facilities: 1) characterized by SIC Code 2865 (Cyclic organic crudes and intermediates, and organic dyes and pigments) and 2) having a CERCLIS EPA identification number. (Sites with a CERCLIS number encompass hazardous waste sites, potential hazardous waste sites, and sites with remedial activities under Superfund, including sites that are on the National Priorities List (NPL)). A total of 49 facilities met these two criteria. EPA's ROD database was also queried to identify the availability of additional information on these facilities. Section 3 summarizes the results of these queries.

2.0 Previously Published Damage Incident Reports

This section presents the following: 1) summaries of public comments received in 1995 regarding the damage incident cases published in 1994, and 2) brief summaries of any newly available information, when available, for each damage case since 1994.

2.1 BASF Corporation, Holland, Michigan

<u>Public comments regarding case:</u>

Color Pigments Manufacturers Association, Inc. (CPMA)

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[1] See the report prepared for the 1994 proposed rule, "Resource Damage Incidents for Dye and Pigment Industry," August 1994, in the docket for current proposal.

CPMA addressed the BASF Site in Holland, Michigan, particularly the groundwater contamination. They commented that this contamination did not contain any "azo pigment analytes of concern" nor did it stem from azo pigment production. Furthermore, they referred to BASF comments concerning the absence of environmental damage incidents related to the waste streams addressed in the rule.

BASF Corporation
BASF commented on their Holland, Michigan site, noting that the EPA was not correct in stating that historical contamination at the site stemmed from the management of azo pigment wastes covered in the Proposed Listing. BASF said that the historical soil and water contamination detected near the previous OCM building was not "attributable" to wastes covered in the Proposed Listing but rather to the historical production of azo pigment intermediates, which was discontinued in 1980. A further section of the comments addressed the issue of the Holland facility's wastewater emissions. BASF asserted that these releases did not result in the degradation of Lake Macatawa. Related to this, BASF also discussed the Lake Macatawa sediment contamination, which was cited by the EPA. They further asserted that this contamination resulted from historical management practices stemming from wastewater treatment activities in the 1960's and that these activities would not recur in the future. Furthermore, they cited their full remediation of this contamination and that existing state solid waste regulations were sufficient to prevent use of the historical management practices responsible for the contamination.

Site update:
This facility is one of the 1,714 facilities on the RCRA Government Performance and Results Act (GPRA) Cleanup Baseline. However, the status of remedial activities was not presented in the EPA report prepared June 24, 2003. No data were available via EPA's CERCLIS regarding remedial actions at this facility.

2.2 Blackman-Uhler Chemical, Spartanburg, South Carolina

Public comments regarding case:

Color Pigments Manufacturers Association, Inc. (CPMA)
The CPMA mentioned that the contamination at the Blackman-Uhler facility was not related to the production of azo pigments and did not include "analytes of concern" connected with the production of azo pigments. Supporting information was cited, including data gathered from a "close review" of the Proposed Rule's Docket pertaining to remediation activities.

Ecological and Toxicological Association of Dyes and Organic Pigments Manufacturers (ETAD)
Through the extensive comments on damage incidents, ETAD addressed the Blackman-Uhler facility's damage case report. They spoke about the "failure" to isolate contamination by constituents of concern. Also addressed were the historical nature of the releases and the role of outdated management practices, including historical practices that would not be allowed under current regulations. In addition, their comments specifically address "numerous inaccuracies and overstatements." These particular examples are listed below as found in the report:

- The report incorrectly identifies the facility as an "interim status facility for treatment and storage of hazardous waste"; hazardous wastes are not treated onsite and are shipped offsite within 90 days.
- Surface impoundments used prior to the installation of the pretreatment system in 1974 received their wastes through pipes -- the wastewater was not "allowed to flow overland."
- The aeration basin ceased to receive hazardous waste in 1982, not 1984.
- The report heralds that the facility is violating South Carolina law, while any facility with groundwater contamination from any on-site source is in violation of this provision.
- The facility requested that chloro-methyl-benzenamine be added as a groundwater protection standard parameter in 1989 upon changing analytical laboratories. This constituent, which is not a constituent of concern, is believed to relate to historic manufacturing practices on the property.

Site update:
This facility is one of the 1,714 facilities on the RCRA Government Performance and Results Act (GPRA) Cleanup Baseline. The EPA report prepared June 24, 2003, states that "Migration of Contaminated Groundwater Under Control has been verified" and that "Current Human Exposures Under Control has been verified." No data were available via EPA's CERCLIS regarding remedial actions at this facility.

2.3 Ciba-Geigy Corporation, Toms River, New Jersey

Public comments regarding case:
No specific reference found in the comments.

Site update:
The following information is taken from the 9/29/2000 ROD or the site fact sheet prepared by EPA Region 2:

- The facility ceased all commercial operations in 1996.
- Groundwater and soils are contaminated with volatile organic compounds (VOCs) including benzene, trichloroethylene (TCE), chlorobenzene, 1,2-dichloroethane and toluene, and heavy metals.
- The facility began a full-scale groundwater treatment operation in March 1996. The on-site plant currently treats 2.5 million gallons per day.
- In September 2000, EPA issued a ROD which called for the bioremediation of approximately 145,000 cubic yards of contaminated soils and the excavation and off-site disposal of about 32,000 drums.

2.4 Zeneca/ICI Americas, Inc., Dighton, Massachusetts

Public comments regarding case:

Ecological and Toxicological Association of Dyes and Organic Pigments Manufacturers (ETAD)
Among the other damage cases addressed by ETAD, they commented that this facility is not

representative of the current waste practices since it has ceased the production of azo dyes and has been demolished. ETAD also addressed the facility's contamination and its linkage to azo dye manufacturing. In addition, ETAD's comments took issue with specific "inaccuracies or omissions."

Site update:
This facility is one of the 1,714 facilities on the RCRA Government Performance and Results Act (GPRA) Cleanup Baseline. However, the status of remedial activities was not presented in the EPA report prepared June 24, 2003. No data were available via EPA's CERCLIS regarding remedial actions at this facility. EPA's web site for Region 1 (http://www.epa.gov/region01/cleanup/index.html) reports that the 25-acre industrially zoned site has been used as a manufacturing facility beginning in 1861 until the early 1990's when it closed. Historical use of the site includes manufacture of lead oxide, pigments, textile dyes, adhesives, fire fighting chemicals and other specialty items. Zeneca has performed Corrective Action activities voluntarily since 1995. Zeneca has demolished several buildings, removed contaminated soils and sediments from several on-site areas, and continues to investigate the extent of contamination on and off-site and evaluate appropriate remedial measures.

2.5 Sandoz/Martin-Marietta-Sodyeco, Charlotte, North Carolina

Public comments regarding case:

Ecological and Toxicological Association of Dyes and Organic Pigments Manufacturers (ETAD)
As with several other facilities, ETAD made specific comments on applicability of this facility's damage case. They stated that this site's contamination was primarily from solvent usage related to the production of specialty chemicals and intermediates, as well as non-azo pigment purification. In addition, ETAD said that the groundwater contaminants found onsite were not "K164/K165 constituents of concern." They emphasized that this facility's contamination stems from historical practices (i.e., from 1936) that would not be allowable under present regulations. ETAD also noted that the site is not representative of current dye manufacturing and waste handling methods since it has ceased azo dye production.

Clariant Corporation
Clariant Corporation commented on this facility extensively in its comments. They suggested that this site assessment was not supportive of the Proposed Rule because the contamination stemmed from the use of solvents during the purification of one non-azo pigment and the production of specialty chemicals and intermediates. They describe the history of the company and present the new onsite treatment technology being utilized for dye waste treatment. Clariant also made reference to their inclusion as a superfund site and the cessation of azo and disperse dye production at the facility. Emphasized in particular was the lack of human exposure in the past and in the future. They concluded by saying that none of the contaminants were used in azo dye production.

Site update:
The following information is taken from the September 2002 Five-Year Review prepared by EPA

Region 4:

- The remedy for contaminated stockpiled soils within Area C was changed from on-site treatment to off-site treatment and disposal.
- A flushing system for *in-situ* soils within Area C was installed in 1999.
- The remediation of Area D soils was complete in 1999.
- The site achieved construction completion status in September 1999.

2.6 Bayer/Mobay Corporation/Miles, Inc., Charleston, South Carolina

Public comments regarding case:

Color Pigments Manufacturers Association, Inc. (CPMA)
CPMA comments concerning this facility asserted that the Miles facility has never engaged in the production of azo pigments. In addition, they said that the analytes pertaining to the background document and Proposed Rule were not related to the contaminants characterized at the Miles site, and that these contaminants stemmed from the non-pigment product preparation processes in the past at this facility.

Ecological and Toxicological Association of Dyes and Organic Pigments Manufacturers (ETAD)
Through the extensive comments on damage incidents, ETAD addressed the Bayer/Mobay/Miles, Inc. facility's damage case report. They focused on former holding and equalization ponds and contamination in the drum washing area. Specifically, the comments asserted that this contamination was not a result of "current" waste management practices, nor was it attributable to azo dye production. ETAD pointed out that the holding and equalization ponds were closed under RCRA in the late 1980s. In addition, they stated that the contaminating constituents from the drum sump and station detected in the groundwater would not result from azo dye manufacture. Concerning the detection of aniline in drum waste area soils in an active part of the facility, ETAD noted that "only five percent of aniline consumption" at the facility was for azo dye production versus the 95 percent used for specialty chemical manufacture.

Bayer Corporation
Bayer made numerous comments. In summary, these included:

- Constituents of concern detected did not result from azo dye manufacturing.
- Groundwater degradation at the hazardous RCRA units is effectively managed.
- Groundwater degradation at the solid waste management units (SWMUs) is being addressed and will be managed.
- The unlined surface impoundment previously used for wastewater treatment is not applicable because it is no longer used.
- The potential risk to the environment from these incidents is minimal, if any.

Site update:
This facility is one of the 1,714 facilities on the RCRA Government Performance and Results Act (GPRA) Cleanup Baseline. The EPA report prepared June 24, 2003, states that "Migration of

Contaminated Groundwater Under Control has been verified" and that "Current Human Exposures Under Control has been verified." No data were available via EPA's CERCLIS regarding remedial actions at this facility.

2.7 National Starch and Chemical Company, Leland, North Carolina

Public comments regarding case:

Ecological and Toxicological Association of Dyes and Organic Pigments Manufacturers (ETAD)
While stating that they had limited information on this facility, ETAD generally stated that this facility (among others) utilized outdated/no longer permitted disposal methods and that it could not be shown that azo waste management caused the on-site environmental contamination. As a result, they stated that its inclusion as a damage incident does not support K164 or K165 listings. Specific to this site, ETAD questioned whether azo dyes or dye wastes were disposed of in the unlined trenches and that these onsite practices were outdated.

Site update:
[The following information in Envirofacts was found for the National Starch facility in Salisbury, NC, which is approximately 200 miles from Leland. The other information found matches with the information presented in the ROD for the Salisbury facility. It was assumed that the Leland facility is in fact the Salisbury facility.]
The following information is taken from the 10/06/1994 ROD or site summary prepared by EPA Region 4:

- The contaminants detected in the soils throughout the site include the following volatile organics: acetone, 2-butanone, chloroform, 1,2-dichloroethane, 1,1-dichloroethene, 1,2-dichloroethene (cis/trans), 1,2-dichloropropane, methylene chloride, tetrachloroethene, trichloroethene, toluene, and vinyl chloride; for semi-volatile organics: bis(2-ethylhexyl)phthalate; and for inorganics: antimony, chromium, manganese, thallium, and zinc. The groundwater beneath the site contains essentially the same list of contaminants detected in the soil. The following contaminants were found in surface water/sediment at the site: acetone, 1,2-dichloroethane, barium, manganese, vanadium, and zinc.

2.8 Nyanza Chemical, Ashland, Massachusetts

Public comments regarding case:

Ecological and Toxicological Association of Dyes and Organic Pigments Manufacturers (ETAD)
While stating that they had limited information on this facility, ETAD generally stated that this facility (among others) utilized outdated/no longer permitted disposal methods and that it could not be shown that azo waste management caused the on-site environmental contamination. More specifically, they cited the numerous historical methods of waste disposal onsite from 1917 until the plant's closure in 1978, which do not represent current practices in the chemical manufacturing field.

Site update:
The following information is taken from the August 1999 Five-Year Review or site summary prepared by EPA Region 1:

- EPA completed the cleanup of mercury contaminated sediments in onsite wetlands and drainageways by August 2001. Data collection and risk assessment activities will continue in 2002 to address contamination of groundwater and Sudbury River sediments and fish. The 35-acre site is part of a proposed 209 acre redevelopment plan centering around a new MBTA rail station. Concurrent with remedial and redevelopment activities, the Massachusetts Department of Public Health is conducting a cancer study to determine if unusually high cases of rare cancers are linked to past site exposures.

2.9 Ott/Story/Cordova Chemical, North Muskegon, Michigan

Public comments regarding case:

Ecological and Toxicological Association of Dyes and Organic Pigments Manufacturers (ETAD)
While stating that they had limited information on this facility, ETAD generally stated that this facility (among others) utilized outdated/no longer permitted disposal methods, and that it could not be shown that azo waste management caused the on-site environmental contamination. As a result, they stated that its inclusion as a damage incident does not support K164 or K165 listings. While allegedly ceasing production of dyes after 1958, it also previously utilized "outdated practices" for vessel wastes and wastewater disposal.

Site update:
The following information is taken from the September 2002 Five-Year Review, 2/26/98 ROD, or site fact sheet prepared by EPA Region 5:

- The primary contaminants in groundwater are: vinyl chloride, 1,1-dichloroethene, and 1,2-dichloroethane; soils: benzoic acid, 1,2-dichlorobenzene, 4-chloroaniline, 1,1,1- trichloroethane, xylene, toluene, 1,4-dichlorobenzene, hexachlorobenzene, 4,4'-DDT, and dioxin.
- The groundwater treatment facility began operations in February 1996 and has removed 6,300 pounds of contaminants from approximately 2,943,500,000 gallons of groundwater through January 2003. The operation is expected to continue through 2030.

2.10 Clariant Corporation/Sandoz Chemical Company, Martin, South Carolina

Public comments regarding case:

Ecological and Toxicological Association of Dyes and Organic Pigments Manufacturers (ETAD)

Among the other damage cases addressed by ETAD, they commented that the damage incident report for the facility does not suggest that azo dye wastes contributed to the contamination of groundwater or other sensitive environments. Comments also question the report's inability to show that current azo dye waste management presents a threat to the environment. Further, ETAD disputes the attribution of contamination to azo dye waste and the focus of the document on waste management practices no longer utilized (e.g., surface impoundments, spray fields, etc.).

Clariant Corporation
Clariant Corporation also commented on this facility in its submission. They emphasized that there was no risk of human exposure, the diffusion from the sprayfield to the Savannah River was progressing as expected, and the constituents found below the sprayfield have been no more hazardous than seawater. They also commented on the questionable identification and quantification of the amines found by the EPA in the mid-80s that may have stemmed from azo dye manufacture. Furthermore, Clariant pointed out that both the EPA and the State of South Carolina previously encouraged sprayfield irrigation technology when the plant was developed despite later changing methods and regulation.

Site update:
No information on this site was available. This facility was not on the RCRA GPRA Cleanup Baseline. No data were available via EPA's CERCLIS regarding remedial actions at this facility.

2.11 Wamchem, Inc., Burton, South Carolina

Public comments regarding case:
Ecological and Toxicological Association of Dyes and Organic Pigments Manufacturers (ETAD)
While stating that they had limited information on this facility, ETAD generally stated that this facility (among others) utilized outdated/no longer permitted disposal methods and that it could not be shown that azo waste management caused the on-site environmental contamination. More specifically, they cited the facility allegedly ceased production of dyes after 1958, which was followed by onsite solvent recovery and recycling operations. Also cited were the previously utilized "outdated practices" for liquid waste disposal.

Site update:
The following information is taken from the site summary prepared by EPA Region 4:

- The groundwater and soils were contaminated with: acetone, benzene, 1,2-dichlorobenzene, 1,4-dichlorobenzene, naphthalene, toluene, 1,2,4-trichlorobenzene, and xylene. Sediments at the site were also contaminated with: acetone, 1,2-dichlorobenzene, 1,4-dichlorobenzene, toluene, and chlorobenzene.
- 1,800 tons of soil were treated via low temperature thermal desorption by 1994.
- The groundwater recovery and treatment system was operating by September 1997 and is expected to treat approximately 200 million gallons of groundwater.

3.0 Newly Identified Potential Incidents

The following table summarizes the results of the Envirofacts query:

No.	Facility Information	Description
1	Ciba Specialty Chemicals McIntosh, AL ALD001221902	On final NPL. Based on the ROD, the facility has manufactured DDT, pesticides, herbicides, and fluorescent brighteners.
2	Cedar Chemical Corp. Helena, AR ARD990660649	Not on the NPL. Based on description in CERCLIS, the site was a chemical plant and pesticide/herbicide formulating facility.
3	Eastman Batesville, AR ARD089234884	Not on the NPL. No RODs and no information available
4	Vertac Chemical Corp. Jacksonville, AR ARD000023440	On final NPL. Based on the ROD, the facility manufactured munitions, insecticides, and herbicides.
5	Honeywell El Segundo, CA CAD008326589	Not on the NPL. No RODs or CERCLIS description available.
6	Du Pont (Newport Pigment Plant Landfill) Newport, DE DED980555122	On final NPL. Based on the ROD, the landfill received wastes from the adjacent inorganic paint pigment plant and chromium dioxide plant.
7	Metachem Products New Castle, DE DED041212473	On final NPL. Based on the ROD, the facility had a large spill of chlorinated benzenes during rail loading that resulted in inclusion on the NPL.
8	EM Industries Inc. Savannah, GA GAD095797817	Not on the NPL. No RODs or CERCLIS description available.
9	Vulcan Chemicals Smyrna, GA GAD003277191	Not on the NPL. No RODs or CERCLIS description available.
10	BP Amoco Chemicals Joilet, IL ID002994259	On final NPL. Based on the ROD, the facility has manufactured maleic anhydride (MAN), trimellitic anhydride (TMA), and purified isophthalic acid (PIA).

No.	Facility Information	Description
11	JLM Chemicals Alsip, IL ILD981093180	Not on the NPL. No RODs or CERCLIS description available.
12	Solutia Sauget, IL ILD000722074	Not on the NPL. No RODs or CERCLIS description available.
13	Fisher-Calo Laport, IN IND074315896	On final NPL. Based on the ROD, the facility produced and distributed industrial chemicals and reclaimed waste paint and metal finishing solvents.
14	Reilly Tar & Chems Indianapolis, IN IND000807107	On final NPL. Based on the ROD, the facility was a coal tar refinery and wood preserving plant.
15	Harshaw/Englehard Louisville, KY KYD006384531	Not on the NPL. Based on description in CERCLIS, inclusion is believed to be related to an ammonia release (discovery in 1980).
16	Int'l Specialty Products Chemicals. Inc Calvert City, KY KYD006370175	Not on the NPL. No RODs or CERCLIS description available.
17	Catad Chemical Ludlow, MA MAD985298082	Not on the NPL. No RODs or CERCLIS description available.
18	Garden State Tanning Williamsport, MD MDD003062114	Not on the NPL. No RODs or CERCLIS description available.
19	Atofina Riverview, MI MIN000508193	Not on the NPL. Based on description in CERCLIS, inclusion is believed to be related to a rail car fire involving methyl mercaptan and chlorine.
20	Lomac (Bofors Nobel) Muskegon, MI MID00603073	On final NPL. Based on the ROD, the facility manufactured dye intermediates, alcohol-based detergents, saccharin, pesticides, and herbicides. Unlined lagoons were used for wastewater and sludge disposal until approximately 1976.

No.	Facility Information	Description
21	Reilly Tar & Chems St. Louis Park, MN MND980609804	On final NPL. Based on the ROD, the facility was a coal tar refinery and wood preserving plant.
22	Solutia St. Louis, MO MOD004954111	Not on the NPL. No RODs or CERCLIS description available.
23	First Chemical Pascagoula, MS MSN000407609	Not on the NPL. Based on description in CERCLIS, inclusion is believed to be related to an explosion.
24	Vicksburg Chemical Co. Vicksburg, MS MSD990714081	Not on the NPL. No RODs or CERCLIS description available.
25	Clariant (Sandoz/Sodyeco) Charlotte, NC NCD001810365	Presented in the RTI Resource Damage Incidents Document and discussed in Section 3.0 in more detail.
26	Kosa Wilmington, NC NCD990734055	Not on the NPL. No RODs or CERCLIS description available.
27	Yorkshire Americas Lowell, NC NCD044444735	Not on the NPL. No RODs or CERCLIS description available. Completed a preliminary assessment in 1985 and sit inspection in 1989–low priority.
28	Atlantic Chemical Co. Nutley, NJ NJD002177186	Not on the NPL. No RODs or CERCLIS description available.
29	Ciba-Geigy Toms River, NJ NJD001502517	Presented in the RTI Resource Damage Incidents Document and discussed in Section 3.0 in more detail.
30	General Color Co. Camden, NJ NJD002355394	Not on the NPL. No RODs or CERCLIS description available. EPA completed an emergency removal in 1999 (cost $4,000).
31	Kalama Chemical Inc. Garfield, NJ NJD002005148	Not on the NPL. No RODs or CERCLIS description available.

No.	Facility Information	Description
32	M. A. Hanna Color Neshanic Station, NJ NJD046956892	Not on the NPL. No RODs or CERCLIS description available.
33	Mobil Chemical Co. R&D Edison, NJ NJD980593404	Not on the NPL. No RODs or CERCLIS description available.
34	Pfister Chemical Inc. Ridgefield, NJ NJD001293216	Not on the NPL. CERCLIS provided only the following description: "Sludge samples collected by the NJDEP in June 1982, contained high levels of toluene, total xylenes, chlorobenzene, and ethylbenzene. Pfister has been depositing hazardous wastes into a 2.5 acre unlined lagoon for 30 years."
35	Sun Chemical Corp. Newark, NJ NJD002155703	Not on the NPL. No RODs or CERCLIS description available. Removal completed in 1989 for site named "Arkansas Company" at this address.
36	White Chemical Corp. Newark, NJ NJD980755623	On final NPL. Based on the ROD, the facility manufactured acid chlorides and flame retardant compounds.
37	Arch Chemicals Inc. Rochester, NY NYD002220804	Not on the NPL. No RODs or CERCLIS description available.
38	BASF Rensselaer, NY NYD000234971	Not on the NPL. No RODs or CERCLIS description available. Facility is now closed.
39	Diaz Chemical Holley, NY NYD067532580	Not on the NPL. No RODs or CERCLIS description available.
40	Honeywell (Allied) Ironton, OH OHD043730217	On final NPL. Based on a ROD, the facility was a former coke plant. Currently a tar plant operates on the site.
41	Beazer East Inc. Bridgeville, PA PAD063764898	Not on the NPL. No RODs or CERCLIS description available.

No.	Facility Information	Description
42	Drake Chemical Lock Haven, PA PAD003058047	On final NPL. Based on a ROD, the facility manufactured chemical intermediates used in producing dyes, cosmetics, textiles, pharmaceuticals, and pesticides.
43	Du Pont Diagnostics Manati, PR PRD090565631	Not on the NPL. No RODs or CERCLIS description available.
44	Clariant (Sandoz) Martin, SC SCD082228347	Presented in the RTI Resource Damage Incidents Document and discussed in Section 3.0 in more detail.
45	Nation Ford Chemical Fort Mill, SC SCD086862950	Not on the NPL. No RODs or CERCLIS description available. Preliminary assessment completed in 1987 and site inspection completed in 1990 for "R-M Industries." In 1999, no further action was planned.
46	Tennessee Eastman Kingsport, TN TND003376928	Not on the NPL. No RODs or CERCLIS description available. Discovery and site inspection in 1980 (deferred to RCRA Subtitle C).
47	Veliscol Chemical Corp. Memphis, TN TND061314803	Not on the NPL. No RODs or CERCLIS description available.
48	Du Pont La Porte, TX TXD008079212	Not on the NPL. Based on description in CERCLIS, the facility is an active biomedical manufacturing site.
49	Bayer New Martinsville, WV WVD056866312	Removed from proposed NPL. No RODs or CERCLIS description available.