



### REGION 3

PHILADELPHIA, PA 19103

August 15, 2025

#### VIA ELECTRONIC MAIL

David Salinas  
Senior Development Manager  
Scannell Properties  
[david.salinas@scannellproperties.com](mailto:david.salinas@scannellproperties.com)

Dear Mr. Salinas:

The U.S. Environmental Protection Agency, Region 3 (EPA) is issuing this letter in response to a request from Scannell Properties (Scannell) during a conference call held between EPA, Pennsylvania Department of Environmental Protection (PADEP), Scannell, and Langan Engineering & Environmental Services, LLC (Langan) on March 27, 2025. The purpose of the meeting was to discuss the EPA's comments on the Act 2 Combined Remedial Investigation/Risk Assessment/Cleanup Plan dated September 23, 2024 (Cleanup Plan), for the Former Elementis Pigments Facility located at 1525 Wood Avenue, Easton, PA (Facility).

As you are aware, the Facility is subject to Resource Conservation and Recovery Act (RCRA) Corrective Action. RCRA is the federal statute that creates the framework for the proper management of hazardous and non-hazardous solid waste. Corrective action is a requirement under RCRA for facilities that treat, store or dispose of hazardous wastes, or did so in the past, investigate and clean up hazardous releases into soil, groundwater, surface water, sediment and air. Pennsylvania is not authorized to implement the RCRA Corrective Action Program. Therefore, EPA retains authority for RCRA Corrective Action in Pennsylvania.

The Facility is currently owned by Abruzzi Trust and the property is being redeveloped by Scannell Properties. The EPA reviewed the Cleanup Plan, prepared by Langan on behalf of Scannell, and the information provided to EPA regarding the intended use of the Facility. The Cleanup Plan states that the redevelopment plan for the Facility will involve massive cuts and fills and re-grading for construction of an approximately one million square foot warehouse building. The redevelopment will also contain paved parking areas and stormwater basins.

On June 13, 2025, Langan submitted a response to EPA's comments (RTCs) on the Cleanup Plan which included a Materials Management Plan (MMP). The June 13, 2025 RTCs and MMP provide that the pre-construction grading plan includes extensive blasting of bedrock to achieve final excavation depths. In addition, areas where sample data show soil contamination over EPA Regional Screening Levels will be capped with a minimum of 2 feet of processed bedrock fill and use restrictions will be implemented via an environmental covenant to prevent human exposure to contaminants at the Facility. Additionally, little to no fill is planned to be placed in an area surrounding historic boring

location SB-15. Contaminated soils will be excavated, and post excavation samples will be collected to document the cleanup.

Based on the information provided and the existing contamination at the Facility known to EPA at this time, EPA has determined that Scannell's proposed cleanup of Facility soils, as described in the Cleanup Plan, RTCs, and MMP, are sufficient given Scannell's intended use of the Facility. This determination is based on the condition that the work in the Cleanup Plan and MMP is implemented and all activity and use restrictions identified in the Cleanup Plan are implemented and maintained. Please note that while EPA has determined that the proposed actions are sufficient, EPA has not yet made a final remedy selection for Facility soils. EPA will make a final remedy selection after any necessary public participation requirements are met. If EPA determines that additional institutional controls or other corrective actions are necessary to protect human health or the environment, EPA has the authority to require and enforce such additional corrective actions.

In addition, further evaluation of groundwater at the Facility is necessary. Any contaminated groundwater will also be addressed in a final remedy decision subject to the requisite public participation. Nonetheless, EPA anticipates that additional groundwater characterization activities will not impede Scannell's planned redevelopment at the Facility.

If you have any additional questions or wish to discuss this letter, please contact me at (215) 814-3432 or by email at [goldblum.deborah@epa.gov](mailto:goldblum.deborah@epa.gov).

Sincerely,

Deborah Goldblum  
RCRA Corrective Action Branch Manager

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