

Long-Term Stewardship R3 RCRA Corrective Action



Joel Hennessy
Land & Chemicals Division
EPA Region 3
April 19, 2017



Engineering Controls

- e.g., Landfill Cap, Fence, Asphalt Cover, Permeable Reactive Barrier, etc.

Institutional Controls

- Governmental
- Information devices
- Proprietary
- Orders/Permits

§26-104. Well Certification.

1. Where private water supply is to be installed for new construction, certification as to capacity and quality is required prior to issuance of an East Rockhill Township building permit for the structure serviced. Certification shall not be required where an existing well is redrilled or a new well installed due to insufficient well yield at an existing single-family residence.

A. The well yield shall be determined by a pumping test of not less than four hours duration conducted at a rate of not less than 150% of the intended long-term withdrawal from the well. The four hour test shall be conducted at a constant pumping rate that should not deviate greater than +/- 5% during the test.

B. In the event the well does not yield a minimum of six gpm, the proposed water system shall be designed to be able to provide sufficient storage via water tanks and/or storage in the well bore for the length of time it will take for the expected peak demand to empty a standard pressure tank supplied by a well pumping six gpm.

C. All well drillers shall, upon completion of the well, provide the Town with a copy of the report submitted to the Commonwealth of Pennsylvania and sufficient data and documentation to verify compliance with subsections (A) and (B) above.

D. At a minimum, the sample of the water produced shall be subjected to examination by a State certified water laboratory for the presence of the following contaminants and certified to be potable.

- (1) Coliforms.
- (2) pH.
- (3) Iron.
- (4) Nitrate
- (5) Total
- (6) TCE
- (7) Det
- (8) Be

GRANTOR:

PROPERTY ADDRESS: **United States Steel**
One Ben Fairless Drive, Falls Twp. Bucks County, PA

ENVIRONMENTAL COVENANT

This Environmental Covenant is executed pursuant to the Pennsylvania Uniform Environmental Covenants Act, Act No. 68 of 2007, 27 Pa. C.S. §§ 6501-6517 (UECA). This Environmental Covenant subjects the Property identified in Paragraph 1 to the activity and/or use limitations in this document. As indicated later in this document, this Environmental Covenant has been approved by the Pennsylvania Department of Environmental Protection (Department).

1. **Property affected.** The property affected (Property) by this Environmental Covenant is located in **Falls Township, Bucks (County).**

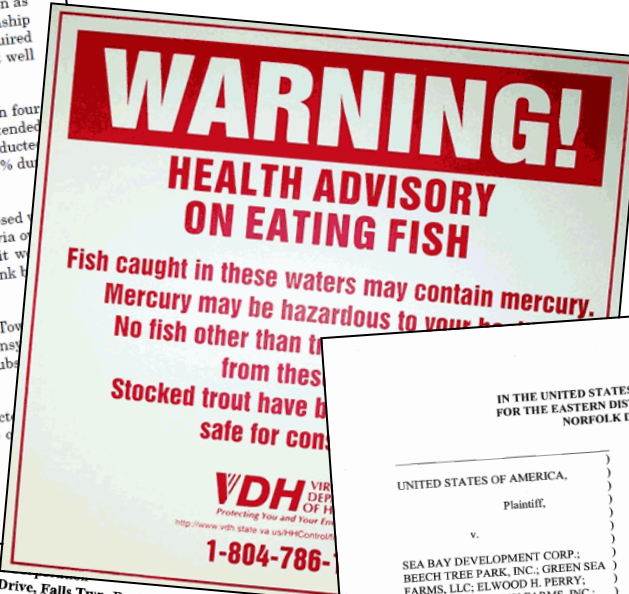
The postal street address of the Property is: **One Ben Fairless Drive, 1-15.**

The County Parcel Identification No. of the Property is: **13-51-1, 13-51-1-14, and 13-51-1-15.**

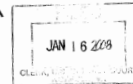
The latitude and longitude of the center of the Property affected by this Environmental Covenant is: **N 40° 09' 33.6" W 74° 45' 15.5".**

The Property has been known by the following name(s): **Proposed Gamesa 73.86-Acre Expansion Project.**

A complete description of the Property is attached to this Environmental Covenant as Exhibit A. A map of the Property is attached to this Environmental Covenant as Exhibit B.



IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION



UNITED STATES OF AMERICA,
Plaintiff,

v.

SEA BAY DEVELOPMENT CORP.;
BEECH TREE PARK, INC.; GREEN SEA
FARMS, LLC; ELWOOD H. PERRY;
FRANK T. WILLIAMS' FARMS, INC.;
and FERRELL'S BACKHOE SERVICE,
INC.,
Defendants.

Civil Action No. 2:06-cv-624

DEPT. OF JUSTICE - EMD
ENVIRONMENTAL DIVISION
8 JAN 22 PM 2:24

CONSENT DECREE

WHEREAS, the Plaintiff, the United States of America, on behalf of the United States Environmental Protection Agency ("EPA"), filed the Complaint herein against Defendants Sea Bay Development Corp.; Beech Tree Park, Inc.; Green Sea Farms LLC; Elwood H. Perry, Jr.; Frank T. Williams' Farms, Inc.; and Ferrell's Backhoe Service, Inc., alleging that Defendants violated Section 301(a) of the Clean Water Act ("CWA"), 33 U.S.C. § 1311(a);

WHEREAS, the Complaint alleges that Defendants violated CWA Section 301(a) by discharging dredged or fill material and/or controlling and directing the discharge of dredged or fill material into waters of the United States at a 1,560-acre property known as the Boshier Site or Green Sea Farm, located west of Johnstown Road, east of Shillelagh Road, and south of the Whispering Pines subdivision, in Chesapeake, Virginia, ("the Site") and more fully described in

Long Term Stewardship Approach

1. Mapping ICs and ECs
2. Maps and information on public website
3. Record ICs and ECs in RCRAInfo (including GIS)
4. IC/EC Assurance Monitoring
5. Engage & update local officials

Mapping ICs and ECs

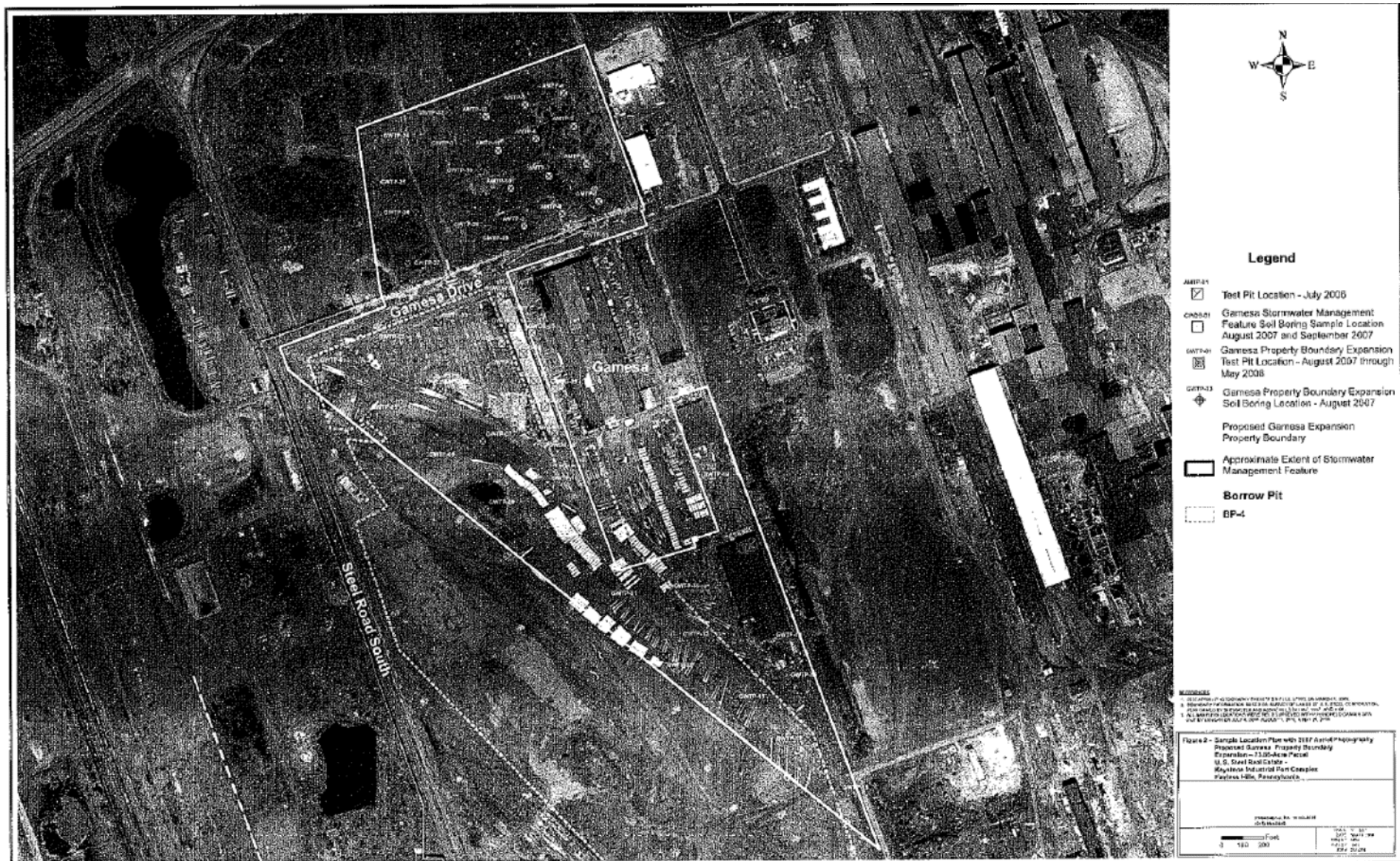
- Property Boundary (for site-wide ICs)
- Individual areas (AULs, specific ECs)
- ESRI ArcGIS Online maps for website (Geoplatform)
- GIS data in RCRAInfo database
- Geospatial PDF
- Improve standard of practice for environmental covenant mapping and figures
 - Metes & bounds
 - Figures
 - Coordinates
 - Geographic data validation

LEGAL DESCRIPTION
for
Proposed Gamesa Property Boundary Expansion
Within KEYSTONE Industrial Port Complex

ALL THAT CERTAIN tract of land situated in the Township of Falls, County of Bucks, Commonwealth of Pennsylvania as shown on Figure 2 - Sample Location Plan with 2007 Aerial Photography Proposed Gamesa Property Boundary Expansion – 73.86 acre parcel prepared for U.S. Steel Real Estate dated May 21, 2008 by Langan Engineering and Environmental Services, Philadelphia, Pennsylvania bounded and described as follows to wit:

BEGINNING at a corner, said corner being the intersection of the right of way line of Gamesa Drive(80 feet wide), Steel Road South (80 feet wide) and running thence; 1) along the northerly right of way line of Gamesa Drive, S 90°00'00" E, a distance of 542.68 feet to a **point**; 2) through lands of U.S. Steel, N 00°00'00" E, a distance of 64.00 feet to a **point**; 3) through same, N 11°55'03" E, a distance of 787.98 feet to a **point**; 4) through same, S 90°00'00" E, a distance of 1157.09 feet to a **point**; 5) through same, S 00°00'00" W, a distance of 835.00 feet to a **point**; 6) along northerly right of way line of Gamesa Drive, N 90°00'00" W, a distance of 20.00 feet to a **point**; 7) crossing Gamesa Drive, S 00°00'00" W, a distance of 58.13 feet to a **point**; 8) along the southerly side of Gamesa Drive, N 90°00'00" W, a distance of 695.50 feet to a **point**; 9) along Gamesa Parcel, S 00°00'00" W, a distance of 1572.87 feet to a **point**; 10) along same, S 90°00'00" E, a distance of 389.00 feet to a **point**; 11) along same, N 00°00'00" W, a distance of 43.00 feet to a **point**; 12) along same, S 90°00'00" E, a distance of 137.75 feet to a **point**; 13) along same, N 90°00'00" E, a distance of 685.04 feet to a **point**; 14) along same, S 90°00'00" E, a distance of 188.25 feet to a **point**; 15) along other lands of U.S. Steel, S 00°00'00" W, a distance of 2362.09 feet to a **point**; 16) through same, N 30°42'26" W, a distance of 3546.31 feet to a **point**; 17) along Steel Road South, N 00°00'00" E, a distance of 129.99 feet to a **corner**, said corner being the true PLACE OF BEGINNING.

Covenant Exhibit



Improved Exhibit:

- Vertices shown
- Coordinate table
- Light or no background
- North arrow
- Bar Scale
- 8.5 X 11
- Can be copied in B/W multiple times

Coordinate Table (WGS 1984)		
Label	Longitude	Latitude
1	-80.7203741	40.0800187
2	-80.7199196	40.0794937
3	-80.7197261	40.0795925
4	-80.7195709	40.0794132
5	-80.7195153	40.079349
6	-80.7194617	40.0792839
7	-80.7194099	40.0792179
8	-80.7193601	40.0791511
9	-80.7193123	40.0790834
10	-80.7192664	40.0790148
11	-80.7192226	40.0789455
12	-80.7191808	40.0788755
13	-80.7196252	40.0785571
14	-80.7200882	40.0782254
15	-80.7210367	40.0790065
16	-80.7207334	40.0794697

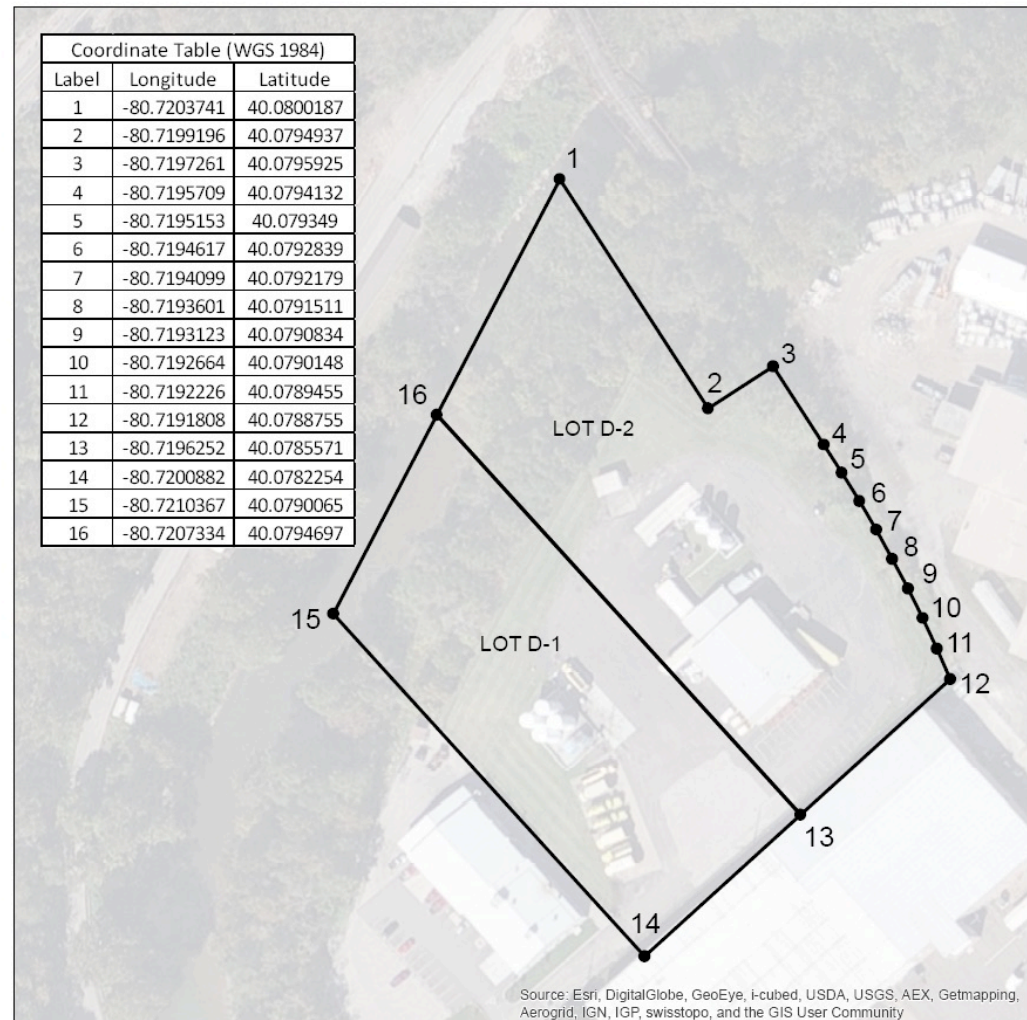


Exhibit A
Safety-Kleen Systems, Inc.
10 Industrial Park
Wheeling, WV
EPA ID # WVD981034101

 Parcel Boundaries

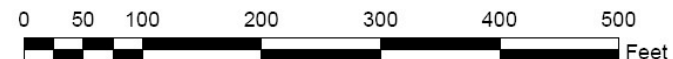
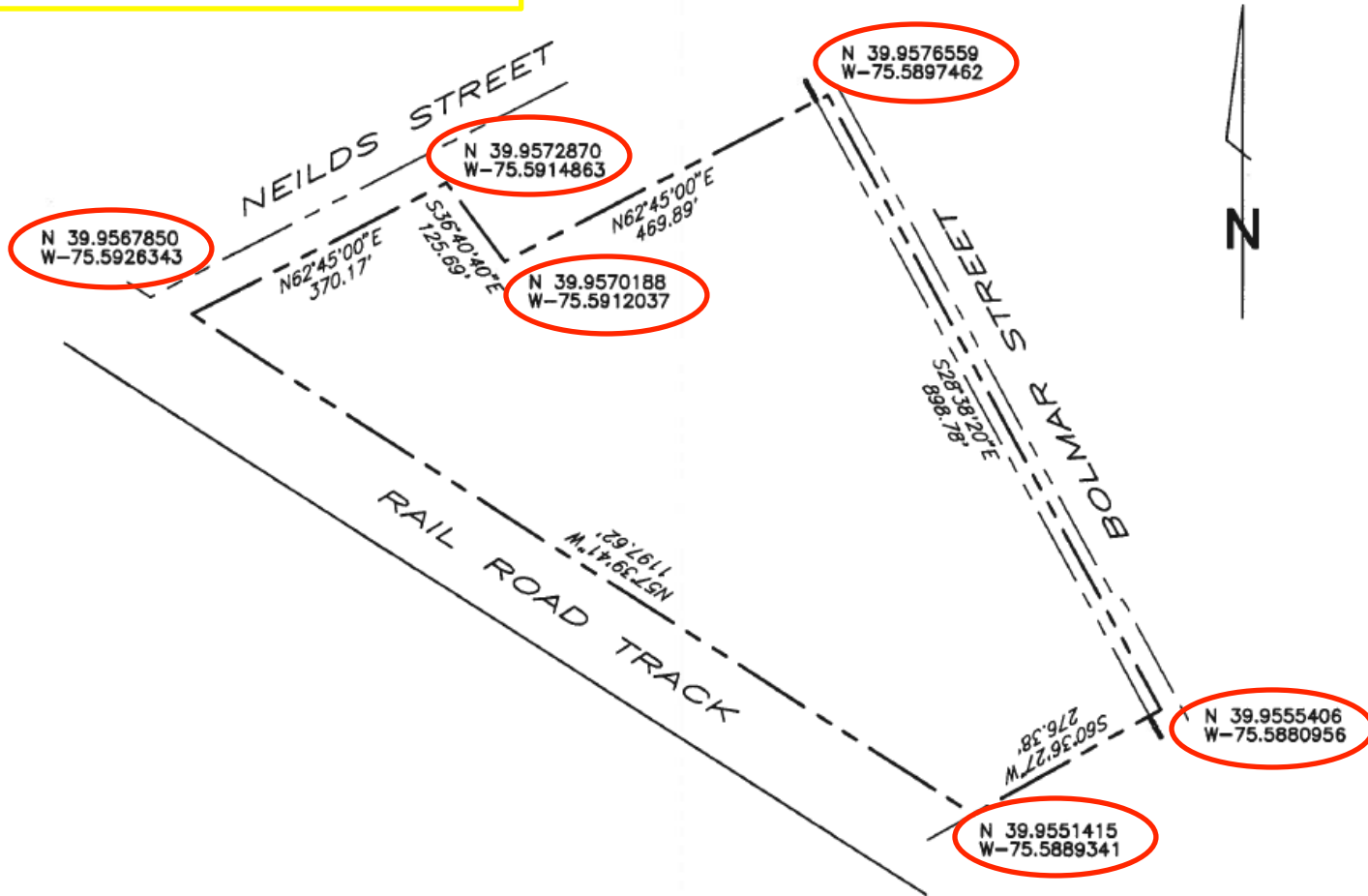


Exhibit B

LATITUDE AND LONGITUDE DATUM = WGS 84



YERKES ASSOCIATES, INC.
ENGINEERS AND LAND SURVEYORS
WEST CHESTER, PENNSYLVANIA
610-644-4254

PROPERTY LOCATION EXHIBIT
PREPARED FOR
SARTOMER USA, INC
WEST CHESTER BOROUGH - CHESTER COUNTY
PENNSYLVANIA
DATE: AUGUST 25, 2010 - SCALE: 1" = 200'

Site Description

Interactive Map of Arkema Incorporated, West Chester, Pennsylvania



Additional Site Information

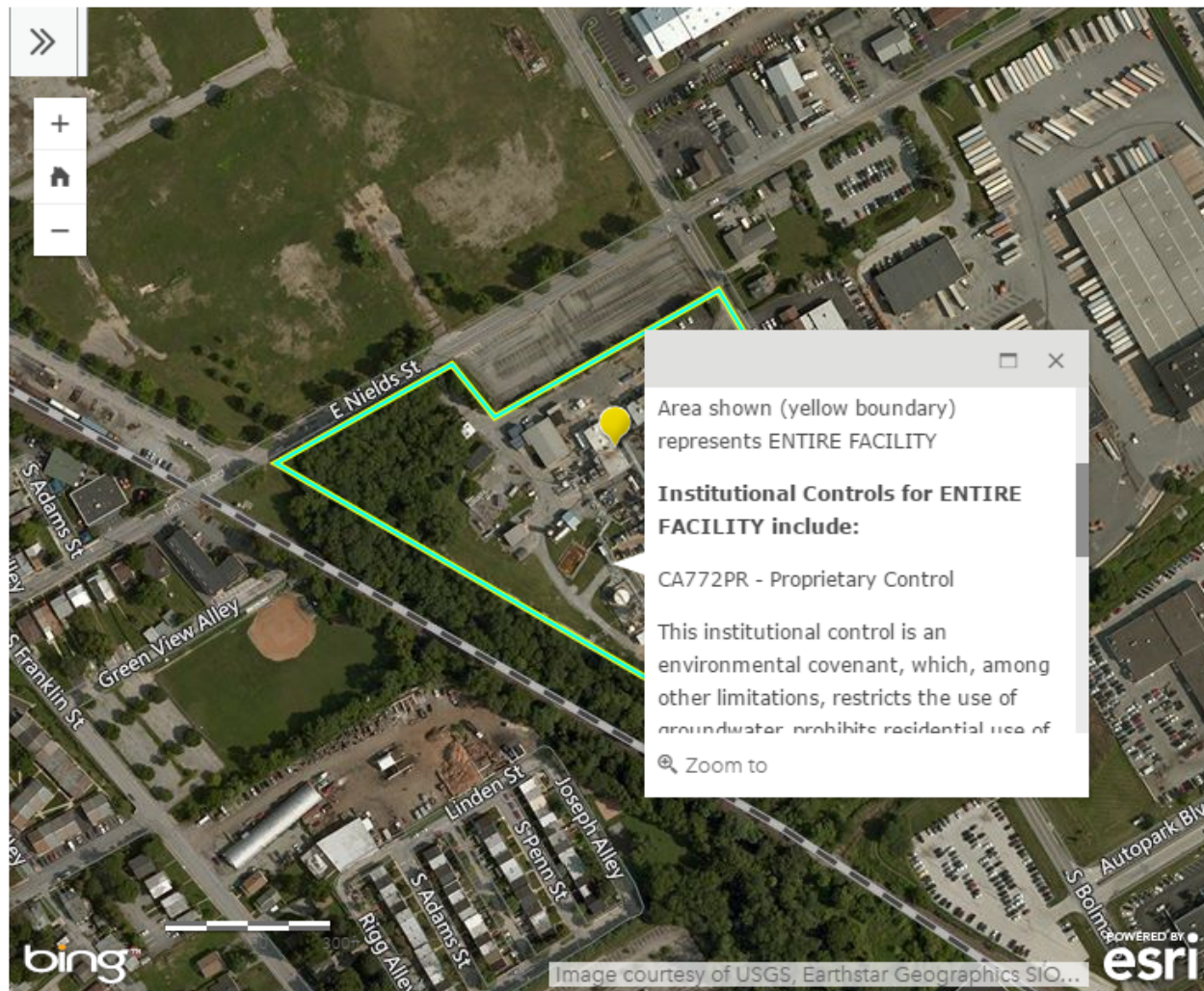
- [Contacts for this Clean Up](#)
- [Documents, Reports and Photographs](#)
- More Information from the [Envirofacts database](#)

[View larger map](#)

The Arkema, Inc. Facility (formerly Sartomer Company and part of Atofina) is located in West Chester, Chester County, Pennsylvania. It is located in an industrial area with a small stream and a high-density residential area to the west. The site consists of 12 contiguous acres of which eight are the industrial portion. The area is served by a public water and sewer system.

Site Description

Interactive Map of Arkema Incorporated, West Chester, Pennsylvania



Additional Site Information

- [Contacts for this Clean Up](#)
- [Documents, Reports and Photographs](#)
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[View larger map](#)

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Related Topics: [Corrective Action Sites around the](#)

Documents, Reports (Arkema Incorporated Company) in West

Some of Arkema Resource Conservation and Recovery

You may need Adobe Reader to view files on this

- [Corrective Action Long Term Stewardship Inspection Report \(Formerly: Sartomer Company, Incorporated\) in West Chester, Pennsylvania \(PDF\)](#) (2 pp, 150 K)
RCRA Corrective Action Long-Term Stewardship
- [Corrective Action Statement of Basis Arkema Incorporated in West Chester, Pennsylvania](#)
Statement of Basis for RCRA Corrective Action
- [Corrective Action Environmental Covenant Arkema Incorporated in West Chester, Pennsylvania](#)
PA Environmental Covenant - Deed Restriction
- [Environmental Indicator Human Exposure Arkema Incorporated in West Chester, Pennsylvania](#)
RCRA Environmental Indicator - Current Human Exposures under Control

GRANTOR: Sartomer USA, LLC

PROPERTY ADDRESS: 610 South Bolmar Street, West Chester, PA 19382

ENVIRONMENTAL COVENANT

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1. Property affected. The property affected (Property) by this Environmental Covenant is located in West Chester Borough, Chester County. The postal street address of the Property is: 610 South Bolmar Street, West Chester, PA 19382. The County Parcel Identification No. of the Property is: 1-10-234. The latitude and longitude of the center of the Property affected by this Environmental Covenant is: 39.95694 and -75.59028. The Property has been known by the following name(s): ARCO, Sartomer Company, Inc.

The area described above is a polygon, the vertices of which have the following geographic coordinates (longitude and latitude, with a datum of WGS1984):

longitude, latitude
-75.5897462, 39.9576559
-75.5880956, 39.9555406
-75.5889341, 39.9551415
-75.5926343, 39.9567850
-75.5914863, 39.9572870
-75.5912037, 39.9570188
-75.5897462, 39.9576559

A complete description of the Property is attached to this Environmental Covenant as Exhibit A. A map of the Property is attached to this Environmental Covenant as Exhibit B.

2. Property Owner / GRANTOR. Sartomer USA, LLC is the Owner of the Property. The mailing address of the Owner is: Sartomer USA, LLC, Oaklands Corporate Center, 502 Thomas Jones Way, Exton, PA 19341.

Previous deedholder: Orkem Acquisition Corp changed its name to Sartomer Company, Inc. on November 9, 1988. Sartomer Company, Inc. changed its name to Sartomer USA, LLC on November 6, 2009.

ARKEMA INC **WEST CHESTER** **PAD042259374**

[Add GIS for Facility](#) [Show All Coordinates](#) 2 record(s) found.

Page: 1

GIS Information				Acreage			Coordinates	
Owner	Seq#	Collection Date		Acreage	Source Code	Source Date	Count	
03	211	08/26/2010		12	0001	09/30/2009	7	Hide Coordinates
				Seq #	Latitude	Longitude		
				1	39.957656	-75.589746		
				2	39.955541	-75.588095		
				3	39.955142	-75.588934		
				4	39.956785	-75.592634		

Polygon vertices in RCRAInfo

Linked to institutional control

ARKEMA INC **WEST CHESTER** **PAD042259374**

Event Information

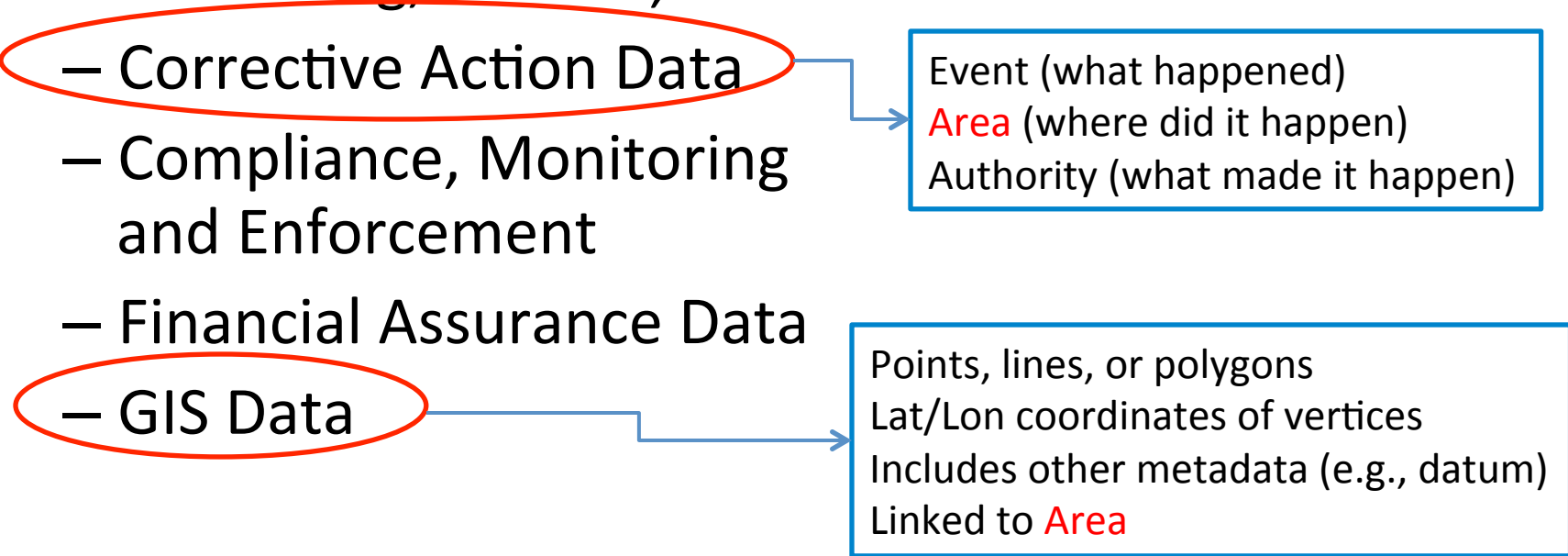
Act Loc	Event Code	Resp Agcy	Actual Date	Sched Date Orig	Sched Date New	Resp Person	Suborg	Notes
PA	CA772PR	E	06/13/2012			KB	3LC30	This institutional control is an Environmental Covenant with PADEP, recorded with the Chester County Recorder of Deeds on 6/13/2012. This control includes the following Activity and Use Restrictions: (a) Groundwater under the property shall not be used for drinking water; other domestic uses; agricultural purposes; (b) Property shall not be used for agricultural, educational, health care, day care, recreational or residential use; (c) Soils from the property shall not be moved unless treated as hazardous waste or handled according to the Pennsylvania Management of Fill Policy (25 PA. Code Chs. 271 & 287); and (d) Monitoring Wells MS-08, MS-11, MS-21, MS-27, RW-16, OW-04, RW-11, and OW-02 are to remain in place and protected against damage unless authorized by the Owner and the EPA in writing.

Institutional & Engineering Event Codes in RCRAInfo

- Engineering Controls Established:
 - CA770NG (non-groundwater control)
 - CA770GW (groundwater control)
- Institutional Controls Established:
 - CA772GC (governmental control)
 - CA772PR (proprietary control)
 - CA772EP (enforcement & permit tools)
 - CA772ID (information device)

RCRAInfo

- RCRA Program database
- Six modules:
 - Handler Data
 - Permitting, Closure, Post-Closure Data
 - Corrective Action Data
 - Compliance, Monitoring and Enforcement
 - Financial Assurance Data
 - GIS Data



Event (what happened)
Area (where did it happen)
Authority (what made it happen)

The diagram shows a blue line with an arrow pointing from the 'Corrective Action Data' module to this box. Another blue line with an arrow points from the 'GIS Data' module to the box below it.

Points, lines, or polygons
Lat/Lon coordinates of vertices
Includes other metadata (e.g., datum)
Linked to **Area**

Cleanups in My Community

Cleanups in My Community (CIMC) enables you to map and list hazardous waste cleanup locations and grant areas, and drill down to details about those cleanups and grants and other, related information. This page provides several ways to get started.

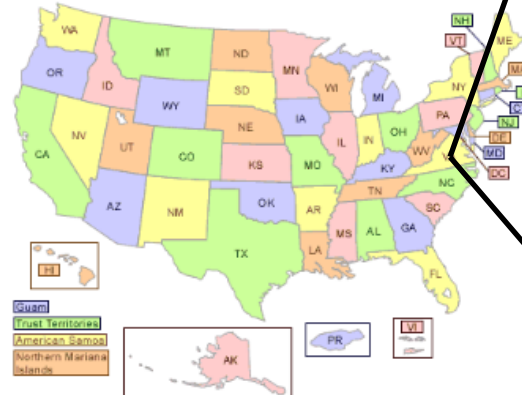
Maps:

- You may want to map the cleanups in:
 - your state or territory,
 - the whole country, or
 - just a specific geographic area.
- You may want to see:
 - all types of cleanups, or
 - just those for a particular cleanup program.

All of the "map" options go to different "views" of the same interactive CIMC map, and there you can zoom and pan to areas of interest, and add additional information.

Look through the Map Cleanups options below or click on the following map.

Map cleanups by clicking on a state or territory below.

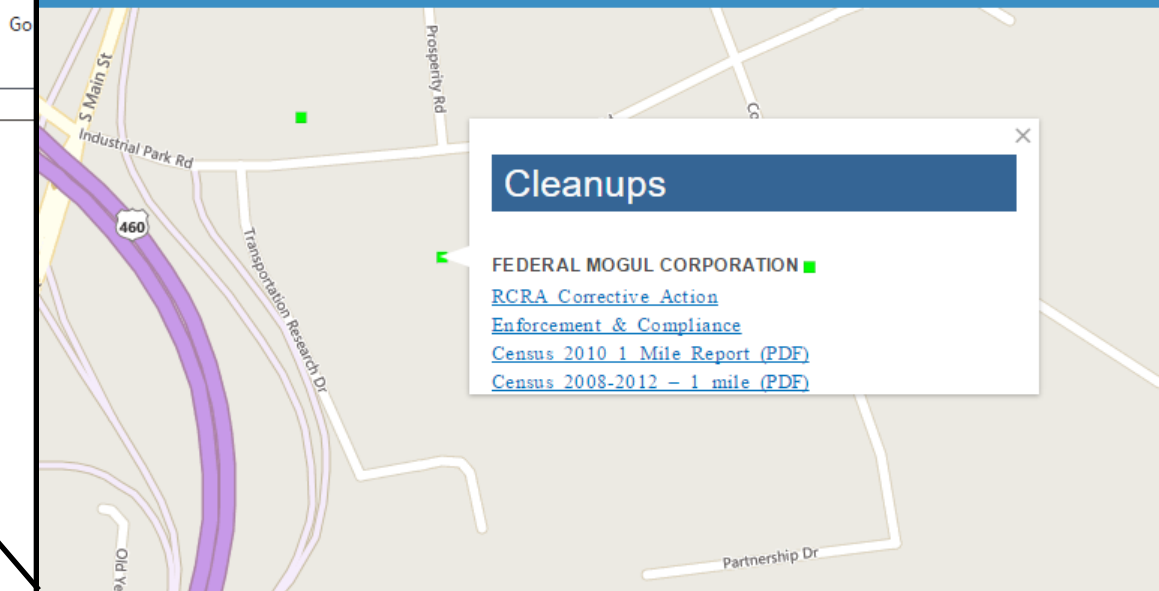


Lists or Tables:

- You may want to list cleanups or grants, in table format, for a ZIP Code area or city.
- You may want to create your own table based on:
 - selected geography:
 - ZIP, city, county, state, tribal area, congressional district
 - watershed, EPA region, the whole USA
 - radius around a location, address, cleanup

Cleanups In My Community Map

- ☒ Site Boundaries (where available)



CIMC – Site Profile Page



[Environmental Topics](#) [Laws & Regulations](#) [About EPA](#)

Search EPA.gov



[Cleanups](#) >> [Cleanups in My Community](#)

[Contact Us](#)

RCRA Corrective Action Site Progress Profile

FEDERAL-MOGUL CORPORATION

ID: (VAD054039961)

This profile is meant to provide you with basic information on EPA's cleanup progress at this RCRA facility. Please use the links in the "More Details" box for additional information.

[Disclaimer/Legal Notices](#)

More Details

- [More In-Depth Site Details \(EPA Regional Content\)](#)
* if this link doesn't work, try this [Regional Content](#).
- [Facility Information \(Facility Registry System\)](#)
- [Facility Detail Report](#)
- [Process Classification](#)
- [Other Names for this Site](#)
- [Programs That This Facility Is Regulated Under](#)

Site Location



Cleanup Progress Summary

Hazardous wastes are managed under the Resource Conservation and Recovery Act. When these wastes contaminate the land, water or air they must undergo corrective action.

Environmental Impact Summary

If this corrective action site has been examined to determine if **human exposures to contaminants** are under control and the **migration of contaminated water** is under control, that information is provided below.

Are Controls in Place at this Site?

Control Type		Control in Place?	Area(s) Subject to Control
Institutional Controls (Type)	Information Device (ID)	Yes	TCE PLUME
	Governmental Control (GC)		
	Enforcement & Permit Tools (EP)	Yes	ENTIRE FACILITY, SOIL MANAGEMENT AREA, TCE PLUME
	Proprietary Control (PR)	Yes	ENTIRE FACILITY, SOIL MANAGEMENT AREA
Engineering Controls (Type)	Groundwater (GW)	Yes	ENTIRE FACILITY
	Non-Groundwater (NG)	Yes	ENTIRE FACILITY, SOIL MANAGEMENT AREA

Final Remedies with ICs & ECs – R3

(out of a 2020 GPRA Universe of 579 facilities)

State	# Sites with IC and/or EC (in RCRAInfo)	# Sites Mapped
DC	1	0
DE	5	5
MD	18	10
PA	92	56
VA	47	27
WV	15	10
Region 3 RCRA CA	178	108

as of 10/4/2016

Long Term Stewardship Approach

1. Mapping ICs and ECs
2. Maps and information on public website
3. Record ICs and ECs in RCRAInfo (including GIS)
4. IC/EC Assurance Monitoring
5. Engage & update local officials

IC/EC Assurance Monitoring

- Document review
- Site inspection checklist
- Site inspection (w/ checklist and geospatial PDF)
- IC/EC Monitoring report
- Goal:
 - Determine whether the IC/ECs are functioning and maintained
 - Identify and correct IC/EC deficiencies

Geospatial PDF

- Adobe Acrobat PDF map
- Contains georeference data
- Both vector and raster information
- ESRI ArcMap can create geospatial PDFs
 - Natural end product in GIS workflow
 - Project managers already familiar with PDFs
 - Opens in Avenza Maps App on iOS and Android devices
 - Project managers can upload (no additional GIS support needed)





What does an LTS evaluation look like?

- Preparation
 - Review remedy, recent data/reports
 - Develop checklist based on selected remedy and ICs/ECs
 - Maps gathered, brought into GIS
 - Update geospatial PDF
- Inspection
 - Brief meeting to discuss
 - Field tour – visit everything on checklist (using geospatial PDF)
 - Photo documentation of current conditions (geotagged)
 - Close-out meeting
- Meet/contact with local municipality
 - Update with remedy status & progress; current points of contact
 - Ask about changes to land and water use, and any concerns they may have
- Follow-up
 - Prepare LTS report, post on web
 - Work with facility to correct any IC/EC deficiencies
 - Record outcome in RCRAInfo

Example: BAE Systems, York, PA



Long-Term Stewardship Checklist

BAE Systems, 1100 Bairs Rd, York PA 17408

EPA web fact sheet: <http://www.epa.gov/reg3wcmd/ca/pa/webpages/pad003025418.html>

A. Pre-Inspection Items

Prior to the site visit, the following pertinent documents were reviewed to ensure remedial components are adequate and up to date:

1. 9/25/91 Corrective Action (CA) Permit
2. 4/1/05 Statement of Basis (SB)
3. 3/6/06 Final Decision and Response to Comments (FDRTC)
4. 3/6/06 CA Permit Modification
5. 9/13/06 Hazardous Waste Facility Post-Closure Permit
6. 3/27/07 National Pollutant Discharge Elimination System (NPDES) Permit
7. 2012 Comprehensive Monitoring Evaluation Inspection
8. May 2013 Operations and Maintenance Summary Report for the Groundwater Remediation Systems

In addition, financial assurance status of the facility was confirmed with PADEP; EPA factsheets, links, and mapping documents were reviewed and updated; a site visit was coordinated with the facility and PADEP; and a meeting with West Manchester Township officials was scheduled to follow the site visit.

B. Site visit

1. Attendees

Name	Affiliation	Phone
Griff Miller	EPA	215-814-3407
Joel Hennessy	EPA	215-814-3390
Andrea Barbieri	EPA	215-814-3374
Pam Trowbridge	PADEP	717-705-4839
Lisa Wilt	PADEP	717-705-4910
Paul Lagowski	BAE	717-225-8059
Steve Douglass	BAE	717-524-0616
George Rodenburg	BAE	717-225-7062
Bob Errera	BAE	717-524-0531
Fred Wise	BAE	717-818-8830
Emily Wade	Leidos	717-425-8894

2. Introduction and purpose of visit

3. File review

Does the facility have a copy of:

- a. 4/1/05 SB? Y ☐ X ☐ N ☐ comments:
- b. 3/6/06 FDRTC? Y ☐ X ☐ N ☐ comments:
- c. 9/25/91 CA permit? Y ☐ X ☐ N ☐ comments:
- d. 3/6/06 CA permit mod? Y ☐ X ☐ N ☐ comments:

- e. Current NPDES permit? Y ___ N x comments: *permit has expired but renewal not yet issued*
- f. Current post-closure permit? Y x N ___ comments:
- g. Inspections of MTR Landfill and any other documentation required as part of permit? Y x N ___ comments:
- h. Deed with notice of use restriction? Y x N ___ comments: *4/3/07 covered 5/17/07 with York County*

4. Site walk

- a. Assess locations (IAW geospatial .pdf) and conditions of WWHS components
1. Air stripper, piping, outfall, and other treatment components: *only GAO WWHS (no air stripper); components and building in good condition*
 2. Well network

Well	Location	Condition
MW20S	<i>Accurate</i>	<i>Good</i>
PW2 (pumping? y/n)	<i>Accurate</i>	<i>Good; pumping</i>
MW13S	<i>Accurate</i>	<i>Good</i>
MW13I	<i>Accurate</i>	<i>Good</i>
PW4 (pumping? y/n)	<i>Accurate</i>	<i>Good; pumping</i>
MW36	<i>Accurate</i>	<i>Good</i>
PW1 (pumping? y/n)	<i>Accurate</i>	<i>Good; pumping</i>
MW17S	<i>Accurate</i>	<i>Good</i>

- b. Assess location (IAW geospatial .pdf) and condition of MTR Landfill
1. Cap integrity: *evidence of burrowing near southeastern border of landfill set outside burrow*
 2. Adequate vegetation: *excellent!*
 3. Well network

Well	Location	Condition
MW16	<i>Did not visit</i>	<i>Did not visit</i>
MW55	<i>Accurate</i>	<i>Good</i>
MW1	<i>Accurate</i>	<i>Good</i>
MW9	<i>Accurate</i>	<i>Good</i>
MW2A	<i>Accurate</i>	<i>Good</i>

- c. Assess locations (IAW geospatial .pdf) and conditions of EPBA components
1. Air stripper, piping, outfall, and other treatment components: *treatment components in good condition*
 2. Well network

Well	Location	Condition
MW21	<i>Accurate</i>	<i>Good</i>
MW45 (pumping? y/n)	<i>Accurate</i>	<i>Good; pumping</i>
MW37	<i>Accurate</i>	<i>Good</i>
MW47 (pumping? y/n)	<i>Accurate</i>	<i>Good; pumping</i>
MW48 (pumping? y/n)	<i>Accurate</i>	<i>Good; pumping</i>
MW43	<i>Accurate</i>	<i>Good</i>
MW19S	<i>Did not visit</i>	<i>Did not visit</i>

MW49 (pumping? y/n)	<i>Did not visit</i>	<i>Did not visit; pumping</i>
MW39	<i>Did not visit</i>	<i>Did not visit</i>

5. Questions, discussion, and wrap-up

- a. Final remedy for CA doesn't appear to include MTR Landfill at all – should it? *Final remedy decision should have mentioned landfill and post-closure requirements for completeness; however, post-closure requirements and inspections are up-to-date and being maintained by PADEP so there's little risk that this landfill will go ignored.*
- b. May wells that aren't part of monitoring program(s) be decommissioned? *Yes, and EPA/PADEP would prefer if these unused wells were decommissioned. Facility expects to implement a progressive decommissioning program in 2015.*
- c. Since NPDES permit covers GW treatment systems and post-closure permit covers MTR Landfill, is the CA permit necessary? *Since neither of these state-run programs have CA authority, the CA permit is still technically required in order to enforce Corrective Action requirements.*
- d. Considering the length of time of groundwater recovery/treatment (began in early '90s) and the low amounts of VOCs recovered annually, are there more feasible remedial options moving forward? *Facility's consultant will analyze feasibility of different/more appropriate remedial options and work with EPA/PADEP to determine implementability.*
- e. Are there any local ordinances that also put restrictions on GW use in the area? Any land use restrictions other than zoning? *BAE personnel believed that there is some type of ordinance requiring hookup to public utilities (i.e., water and sewer) within a certain radius of access to these utilities. According to township officials, residents near the facility rely on private groundwater wells for water, and no resource restrictions other than zoning exist near the facility.*
- f. The CA permit expires March 6, 2016. Does the facility need to submit a renewal application? *EPA does not expect that a renewal application from the facility will be necessary. EPA will determine the need to renew or modify the CA permit prior to expiration based on the present remedy's performance and/or any proposed changes to the remedy (see B.5.d., above).*

6. West Manchester Township visit

a. Attendees

Name	Affiliation	Phone
Griff Miller	EPA	215-814-3407
Joel Hennessy	EPA	215-814-3390
Andrea Barbieri	EPA	215-814-3374
Kelly Kelch	Township manager	717-792-3505
Monica Love	Township zoning officer	717-792-3505
Zane Williams	Township stormwater officer	717-792-3505

b. Summary of discussion

EPA briefed Township officials on the importance of keeping track of the long-term obligations of facilities in their area and of EPA's efforts in developing tools that can help in this regard (e.g., mapping of institutional and engineering controls, use of environmental covenants, periodic LTS visits). After EPA described the components of BAE's remedy, EPA's question (B.5.e., above) and any Township questions were addressed. One Township issue

LTS Evaluation Codes - RCRAInfo

- **CAS88P: LT Stewardship – Pass**
 - LTS assessment completed, all Institutional Controls and/or Engineering controls (IC/EC) are in place, maintained and operated in the manner envisioned when EPA/State selected the remedy, and with current policies and practices
- **CAS88N: LT Stewardship – Need additional Information**
 - Additional information or changes in operation, maintenance of the IC/EC are needed to make a CAS88P determination
- **CAS88C: LT Stewardship – Compliance Review**
 - Selected IC/EC are not in place, operated or maintained, or other issues are identified that suggest the selected remedy is no longer appropriate for the current conditions at the facility, therefore a comprehensive remedy compliance assessment is required

BAE SYSTEMS

YORK

PAD003025418

Event Information

Act Loc	Event Code	Resp Agcy	Actual Date	Sched Date Orig	Sched Date New	Resp Person	Suborg	Notes
PA	CAS88P1	E	05/21/2014			GM	3LC30	5/21/2014 - Inspection - This LTS report can be found on the Corrective Action Facility page on the EPA Region 3 - RCRA Corrective Action website.

Authority Information

Activity Loc	Owner	Type	Effective Date	Resp Agency	Description
PA	HQ	O	09/25/1991	E	Operating Permit

Area Information (Please select one or more areas.)

<input checked="" type="checkbox"/>	4 - ENTIRE FACILITY	<input type="checkbox"/>	2 - EAST PROPERTY BOUNDARY AREA-SWMUS 20,24
<input type="checkbox"/>	3 - MAIN FACILITY-ALL BUT SWMUS 18,20,24	<input type="checkbox"/>	5 - MTR LANDFILL
<input type="checkbox"/>	1 - WEST WAREHOUSE AREA-SWMU 18		

[Back to Event List](#)

URL: /rcrainfo/ca/CA_event_area_upd.jsp

LTS Assessments

State	FY 2014	FY 2015	FY 2016	FY 2017
DC	0	0	0	0
DE	1	2	2	2
MD	3	1	0	0
PA	3	4	15	14
VA	5	9	7	5
WV	3	1	4	1
Region 3 RCRA	15	17	28	22

Questions?

Mapping and LTS Approach documents:

https://www.epa.gov/sites/production/files/2016-07/documents/rcra_mapping_of_institutional_and_engineering_controls.pdf

https://www.epa.gov/sites/production/files/2016-07/documents/r3ltsprogram_july2016.pdf

Cleanups in My Community:

<https://www.epa.gov/cleanups/cleanups-my-community>