

#### **UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION III**

# **Four Penn Center** 1600 John F. Kennedy Boulevard Philadelphia, Pennsylvania 19103-2852

**SUBJECT**: Long-term Stewardship Desktop Assessment

AMP Incorporated, Building 52 (AMP)

EPA ID: PAD041511874 Interstate I-83 & North Street

Loganville, PA 17342

DATE: September 23, 2022

TO: Alizabeth Olhasso, Branch Chief

RCRA CA Branch 2

FROM: Khai Dao, RPM

RCRA CA Branch 2

#### **Introduction:**

Long-term stewardship (LTS) refers to the activities necessary to ensure that engineering controls (ECs) are maintained and that institutional controls (ICs) continue to be enforced. The purpose of the EPA Region 3 LTS program is to periodically assess the efficacy of the implemented remedies (i.e, ECs and ICs) and to update the community on the status of the RCRA Corrective Action facilities. The assessment is conducted in twofold, which consists of a record review and a field inspection, to ensure that the remedies are implemented and maintained in accordance with the final decision.

#### **Remedy Assessment Summary:**

In 2012, the United States Environmental Protection Agency's (EPA) issued a Final Decision and Response to Comments (FDRTC) of Corrective Action Complete without Controls. EPA and the Pennsylvania Department of Environmental Protection (PADEP) conducted a comprehensive file review of the Facility and conducted additional investigation to confirm that there are no unaddressed releases of hazardous waste or hazardous constituents from the Facility. Based on the assessment, EPA issued a no further correction action or land use controls are necessary at the Facility.

### **Facility Background:**

The former AMP facility is approximately 23 acres and consists of two manufacturing buildings designated as Buildings 52 and 143, a chemical storage building, and the fire pond pump house. During its operational years, the Facility manufactured plastic products and electrical components. The Facility is located in a mixed commercial/residential area of Springfield Township.

Two separate EPA ID numbers were assigned to the former AMP facility. The EPA ID No. PAD 041511874 was originally assigned to the entire Site. However, in 1995, AMP obtained a separate EPA ID No. PAR000007369 to designate the operations in Building 143 as a Conditionally Exempt Small Quantity Generator (CESQG) that generates 100 kilograms or less of hazardous wastes per month. The

original EPA ID No. PAD 041511874 presently applies only to the property associated with Building 52.

In 1995, AMP completed a Baseline Assessment (BA) of the site to review historical operations and potential releases to the environment. Groundwater, surface and subsurface soils were evaluated. The investigation consisted of several soil boring samples and the installation and monitoring of five groundwater wells. The locations of the sampling points were determined based on the site reconnaissance and the areas of potential impacts from the Facility's operations.

Soil samples were analyzed for total petroleum hydrocarbons (TPH) and volatile organic compounds (VOCs). The results indicated low concentrations of TPH in all samples ranging from 3.7 to 16.7 mg/kg. The concentrations were below the Pennsylvania Department of Environmental Protection (PADEP) interim Level 2 soil standard of 500 mg/kg. None of the detected constituents in the soil samples exceeded PADEP Residential Direct Contact medium-specific concentrations (MSCs) or Residential Soil to Groundwater MSCs for used aquifers. The levels of constituents detected in soil meet EPA allowable risk range for direct contact for residential land use.

Five monitoring wells and the former plant well were sampled periodically from 1995 to 2001 for VOCs and heavy metals. Levels of heavy metals detected in groundwater were below the maximum contaminant levels (MCLs). Occasionally, levels of VOCs were detected slightly above MCLs in the downgradient wells and the former plant well. Over the years the VOC levels in the downgradient wells have decreased. The most recent groundwater data indicate stable VOC levels below the MCLs for all five monitoring wells.

The former plant well is located at the center of the Site. The well depth is 117 feet, which is approximately 50 feet deeper than the downgradient monitoring wells. The former plant well has not been sampled since 1997. It has since been abandoned and is no longer available for sampling. The former plant well have occasionally detected slightly elevated levels of 1,1,-dichloroethene (DCE) and tetrachloroethylene (PCE) in groundwater. The levels detected in the former plant well for PCE and 1,1-DCE have been between 5-19 ug/L and 4-17 ug/L, respectively. These levels are within EPA allowable risk range for indoor vapor intrusion and do not pose an adverse vapor intrusion exposure risk. All other levels of constituents of concern in groundwater are below MCLs.

In July 2012, PADEP and EPA conducted an offsite groundwater sampling of the available downgradient residential wells to determine if historic levels of 1,1,-DCE and PCE in the former plant well pose an environmental and human health concern. The offsite sample results were non-detects for VOCs. The results confirmed that past detections of slightly elevated 1,1-dichloroethene (1,1-DCE) and tetrachloroethylene (PCE) concentrations in the former plant well have not impacted the surrounding environment. It's been 15 years since the plant well was sampled. Given that there is no continuous source of contamination that may pose an impact to groundwater, the low levels of 1,1-DCE and PCE that were detected in the former plant well have likely decreased over the years through the process of natural attenuation. Remnants of 1,1-DCE and PCE that may still be present in the plant well do not adversely impact the environment as confirmed by the offsite sample results. The Site no longer uses groundwater and is currently connected to public water.

#### **Current Site Status:**

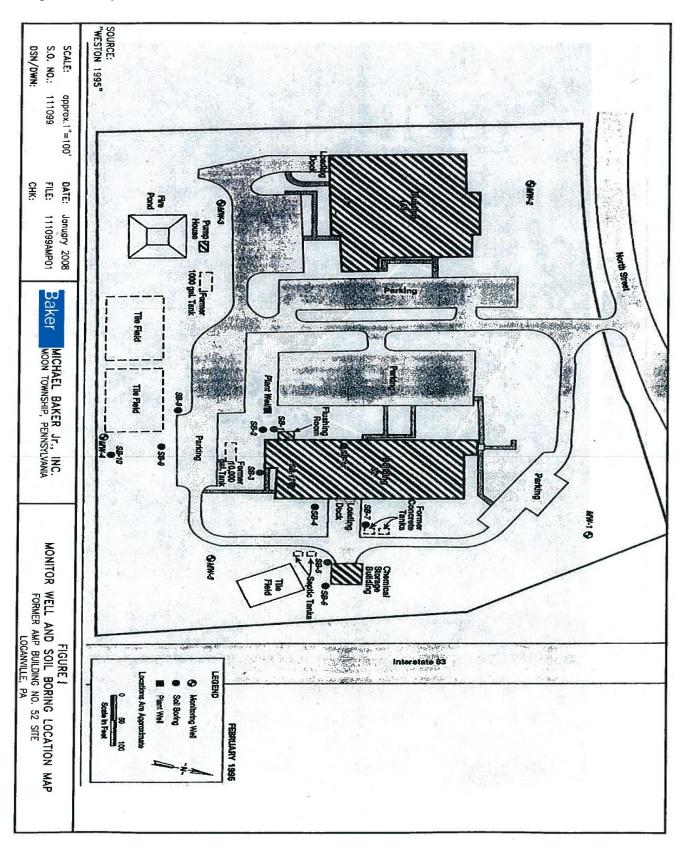
Presently, there are two independent businesses operating at the Site. In 1999, Tyco Electronics Corporation (TEC) acquired AMP. From 2001to 2002, TEC subdivided the Site into two properties and sold each property separately. The portion of the property that consists of Building 52 was sold to Cox Media and Dominion Enterprises who transformed the former manufacturing building into a printing operation business. The company prints classified advertising magazines such as AutoTrader and the Employment Guide. The other half of the Site that consists of Building 143 was sold to Komax Corporation who manufactures industrial equipment that assembles solar panels.

## **Conclusions and Recommendations:**

In 2012, the United States Environmental Protection Agency's (EPA) issued a Final Decision and Response to Comments (FDRTC) of Corrective Action Complete without Controls. The Site is connected to public water and does not utilize groundwater. Presently, there are no institutional or engineering controls required at the Site. EPA will review the local ordinance for groundwater use in the area and may consider implementing institutional controls to restrict groundwater use at the Site.

#### Files Reviewed:

AMP Final Decision and Response to Comments, Prepared by EPA September 2012. AMP Statement of Basis, Prepared by EPA August 2012.



# Engineering Control/Institutional Control Corrective Action Remedy Summary

Facility Name	AMP Ir	AMP Incorporated, Building 52				
Address	Interst	Interstate I-83 & North Street, Loganville, PA 17342				
EPA ID Number	PAD04	PAD041511874				
Are there restrictions or controls that address:	Yes	No	Areas	Description of restrictions, controls, and mechanism		
Groundwater		х				
Residential Use		х				
Excavation		х				
Vapor Intrusion		х				
Capped Areas		х				
Other Engineering Controls		х				
Other Restrictions		х				

# LTS Checklist Template

IC Review and Assessment Questions:	<u>Yes</u>	No	Notes
Have the ICs specified in the remedy been fully			N/A
implemented? Implementation mechanism in place?			
• Do the ICs provide control for the entire extent of contamination (entire site or a specific portion)?			N/A
<ul> <li>Are the ICs eliminating or reducing exposure of all potential receptors to known contamination?</li> </ul>			N/A
Are the ICs effective and reliable for the activities (current and future) at the property to which the			N/A
controls are applied?			
<ul> <li>Have the risk of potential pathway exposures addressed under Corrective Action changed based on updated screening levels and new technologies?</li> </ul>			N/A
<ul> <li>Are modifications to the IC implementation mechanism needed? (i.e. UECA Covenant, Permit or Order)</li> </ul>			N/A
Are there plans to develop or sell the property?		х	
Have all reporting requirements been met?			N/A

Groundwater Review and Assessment Questions:	<u>Yes</u>	<u>No</u>	<u>Notes</u>
Is groundwater onsite used for potable purposes?		х	
• Is the Facility connected to a public water supply?	х		
Have any new wells been installed at the facility?		х	
• Are the current groundwater flow rate and direction similar as mentioned in the previous studies?	х		Assume that it still is.
Groundwater contaminants stable or decreasing in concentration?	х		Assume that it has, based on past findings and deduction.
<ul> <li>Are groundwater monitoring wells still in place (# wells)?</li> </ul>		Х	

<ul> <li>Any evidence or reason to re-evaluate the number and location of monitoring points and/or monitoring frequency?</li> </ul>		x	
• For wells where groundwater monitoring is no longer required, have the wells be decommissioned?	х		
Is there evidence of monitored natural attenuation occuring in groundwater?	х		Onsite and offsite downgradient wells are below MCLs. Assume natural attention process occurs from the low VOC levels detected at the former pump well to downgradient the wells.
Has (active remediation system) been maintained as necessary?			N/A – No active remediation required.
• Is the (groundwater containment system) effectively containing COCs and protecting potential receptors (surface water body and/or groundwater resource) via hydraulic control?			N/A – No active remediation.
Have notification letters been sent to the local POTW, County Department of Health, and Planning and Zoning Department regarding groundwater use restrictions?			GW is not contaminated above PADEP MSC stds. Currently, no gw restrictions at the site. Facility is connected to municipal water.

Surface and Subsurface Soil Review and Assessment		<u>No</u>	<u>Notes</u>
Questions:			
• Is the facility being used for residential purposes?		х	
Have there been recent construction or earthmoving activities or plans for such?		х	

Engineered Cap or Cover Review and Assessment		<u>No</u>	<u>Notes</u>
Questions:			
Have geosynthetic/vegetative landfill caps (name) been properly maintained?			N/A

<ul> <li>Have any repairs been necessary? (i.e. regrading, filling, root removal)</li> </ul>		N/A
• Is the leachate collection system operating and effectively preventing groundwater contamination?		N/A

Vapor Intrusion Review and Assessment Questions:	<u>Yes</u>	<u>No</u>	<u>Notes</u>
Have there been construction of new structures within the vapor intrusion restriction zone(s)?			N/A
• Is the vapor intrusion mitigation system radius of influence effective for the structure in which its installed?			N/A

Miscellaneous Review and Assessment Questions:	<u>Yes</u>	<u>No</u>	<u>Notes</u>
Is the security fence intact?			N/A
Is the appropriate signage posted?			N/A