



REGION 3

PHILADELPHIA, PA 19103

DOCUMENTATION OF LONG-TERM STEWARDSHIP ASSESSMENT

RCRA Corrective Action

Long-term Stewardship (LTS) RCRIS code: CA88P1

Completed by: Khai Dao

Date: 10/9/24

Ascensus Specialties Callery LLC (Ascensus)

EPA ID: PAD004322913

1424 Mars-Evans City Road

Evans City, PA 16033

Long-term Stewardship Assessment Summary:

On August 14, 2024, the United States Environmental Protection Agency's (EPA) Land, Chemicals, and Redevelopment Division (LCRD) representative, Khai Dao, conducted a long-term stewardship (LTS) assessment site visit of the Ascensus Specialties Callery LLC (Facility) in Evans City, PA.

EPA has determined that Ascensus is in compliance with EPA's Final Decision and Response to Comments (FDRTC). EPA concludes that the implemented engineering and institutional controls are effective in meeting the objectives of protection of human health and the environment. Ascensus will continue to implement the Groundwater Control Project (GWC) in accordance with the Post Remedial Care Plan (PRCP) and comply with the environmental covenant that limits land use to non-residential and restricts groundwater use at the Facility.

Introduction:

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.

Facility Background:

The Facility is located on Mars-Evans City Road, 2 miles southeast of Evans City, Butler County, Pennsylvania. The Breakneck Creek tributary flows northerly, along the Facility's western property line, turning to the east in the northern portion of the Facility, where it flows between the manufacturing plant and the plant's Wastewater Pretreatment Facility (WWPF). Several scattered residential properties are also located within a 2-mile radius of the Facility.

Land use surrounding the Facility is mainly rural residential, agricultural, and light industrial. The Site layout is presented on Figure 1.

The original manufacturing plant was constructed in the early 1900s. Mine Safety Appliances Co. (MSA) acquired the Site in the late 1930s. The number and footprint of the Site's mostly small, single-purpose buildings and their batch operations changed throughout MSA's ownership. MSA operated a variety of manufacturing and research operations for several of its divisions that included Safety Products, Filter Products, Callery Chemical Company, MSA Research, and Advanced Systems Division (collectively referred to as MSA). Specialty chemicals, rubber, respiratory protection devices, and oxygen generating devices using potassium superoxide were produced at the Facility.

A variety of wastes are generated at the Facility. Hazardous wastes include caustic wastewater, spent materials from equipment clean-out and laboratory activities, and methanol scrubber solutions. Residual wastes include paper and cardboard, wood, and rubber wastes. The Facility maintains and operates a 90-day accumulation area in B89, as well as several permit-by-rule treatment units. It also utilizes an on-site WWPF to manage its industrial and sanitary wastewater.

On September 12, 2003, BASF Corporation purchased the Site from MSA, and subsequently purchased two adjoining parcels that increased the Site size to 100 acres. Subsequently, BASF sold the Facility to Ascensus Specialties Callery LLC (Ascensus) who is the current owner.

On January 15, 1990, the Department of Justice (DOJ) and MSA entered into a Consent Decree (Civil Action No. 87-1531) (Consent Decree) pursuant to RCRA Section 3008 (a) that required MSA to complete several action items to settle and resolve complaints filed by EPA for injunction relief and penalties under Section 3008 (a). These action items include groundwater monitoring, closure of several Solid Waste Management Units (SWMUs), corrective measures for waste stream runoffs, and the installation of a neutralization pond. In 2001 and under the oversight of the Pennsylvania Department of Environmental Protection (PADEP), MSA fulfilled all its requirements under the Consent Decree to the satisfaction of EPA.

In 1998, MSA initiated the Groundwater Control Project (GWC) under PADEP to investigate and remediate groundwater contamination in response to a release of 1,1,1-trichloroethane (1,1,1-TCA) to groundwater. The GWC expanded to investigate an array of chlorinated volatile organic compounds (VOCs) and encompassed a Facility-wide groundwater monitoring and remediation program to address subsequent releases to groundwater and to include groundwater monitoring for the closures of several former waste management units. The GWC initially included surface water sampling along the Breakneck Creek to evaluate the potential impact of groundwater contamination to surface water. Historic surface water data indicated that Facility-related groundwater contamination did not impact Breakneck Creek. Subsequently, surface water sampling was terminated.

There are 64 groundwater sampling locations throughout the Facility that are used to monitor and evaluate groundwater conditions. These locations consist of 38 shallow wells, 13 deep bedrock wells, and 13 other locations such as springs, standpipes, and outfalls. Twelve site wells are

designated as point-of-compliance (POC) attainment monitoring locations. Of the 51 wells, five are designated recovery wells to remediate groundwater contamination. The recovery wells have maintained hydraulic control and limited groundwater contamination migration within the property boundaries. The recovered contaminated groundwater is pretreated with activated carbon prior to discharging it to the Evans City Water & Sewer Authority (ECWSA). The remaining wells and locations are available for water level measurements and supplemental monitoring.

In 2018, EPA issued a FDRTC that requires the Facility to comply with the Post Remedial Care Plan (PRCP) under PADEP. The PRCP requires that the GWC continues to be operated until the levels of constituents of concern (COCs) meet EPA Maximum Contaminant Levels (MCLs), or PADEP Statewide Health Standards (SHSs), and to maintain hydraulic control to prevent groundwater contamination migration. In addition, the Facility will comply with the environmental covenant that limits land use to non-residential and restricts groundwater use.

Current Site Status:

Ascensus continues to implement the PRCP under PADEP to address groundwater contamination. The Post Remedial Care Plan requires continued groundwater monitoring and remediation and compliance with the environmental covenant that limits land use to non-residential use and restricts groundwater use.

Long-term Stewardship Site Visit:

On August 14, 2024, EPA conducted a long-term stewardship site visit with PADEP to discuss and assess the status of the implemented remedies.

The attendees were:

Name	Organization	Email Address	Phone No.
Khai M. Dao	USEPA	dao.khai@epa.gov	(215) 814-5467
J. Ronald Johnston	PADEP	jamjohnsto@pa.gov	(814) 332-6676
Evan DeMars	Ascensus Specialties	edemars@ascensusspecialties.com	(724) 538-1240
Matt Manna	Ascensus Specialties	mmanna@ascensusspecialties.com	(724) 538-1398
Thomas Walsh	CEC	twalsh@cecinc.com	(412) 249-3174
Paul Armagost	CEC	parmagost@cecinc.com	(412) 249-2342
David F. Vogt	MSA	David.Vogt@msasafety.com	(724) 776-8766

EPA and PADEP representatives along with Ascensus and their consultants, and an MSA representative walked the grounds of the facility and examined the implementation of the groundwater monitoring and remediation system. Several monitoring and recovery wells were inspected. The wells appeared to be operational and properly maintained. The activated carbon groundwater remediation system is effective in treating the groundwater prior to discharging to the Evans City Water & Sewer. Ascensus routinely inspects and maintains the remediation system and the network of wells to ensure the effectiveness of the remedy to cleanup the contaminated groundwater and to prevent offsite migration.

Implementation Mechanism(s):

The Implementation Mechanism is the method for implementing Institutional Controls (ICs) and Engineering Controls (ECs) and other continuing obligations required as a condition of the Final Decision. At this Facility, ICs for groundwater and land use are implemented through an environmental covenant. ECs are implemented and pursuant to the PRCP under PADEP. The following ICs and ECs apply to the Ascensus facility:

Institutional Controls:

Groundwater Use Restriction: Groundwater within the remediation area shall not be used for any purpose other than to conduct the operation, maintenance, and monitoring activities by PADEP and/or EPA, unless it is demonstrated to PADEP that such use will pose a threat to human health or the environment. Groundwater outside the remediation area shall not be used for potable purposes or agricultural activities.

Land Use Restriction: Land use is restricted to nonresidential purposes. Any future building or structure that will be occupied and constructed inside the groundwater remediation area must incorporate either a vapor barrier or a soil gas mitigation system unless adequate testing is done to ensure vapor intrusion from groundwater impacted by volatile organic compounds will not present a potential human health concern.

Engineering Controls: Implement groundwater remediation and monitoring pursuant to the PRCP under PADEP.

A summary of the implemented ICs and ECs is described in Table 1 below.

Financial Assurance:

Ascensus is in the process of submitting financial assurance for the implementation of the PRCP. EPA will update the report after EPA reviewed the documents.

Reporting Requirements/Compliance:

Annual groundwater reports are submitted to EPA and PADEP to confirm the efficacy of the implemented remedy to cleanup groundwater contamination and control offsite migration and to ensure compliance with the activity and use limitation in accordance with the environmental covenant.

Mapping:

The property boundary has been geospatially mapped. A downloadable geospatial PDF map is available at https://www.epa.gov/sites/default/files/2020-05/documents/geospatialpdf_basf_evans_city_0.pdf

Conclusions and Recommendations:

EPA determined that Ascensus is in compliance with EPA's FDRTC and the environmental covenant. EPA concludes that the implemented engineering and institutional controls are effective in meeting the objectives of protection of human health and the environment. Ascensus will continue to implement the PRCP under PADEP.

Files Reviewed:

Ascensus 2024 Annual Report

Ascensus 2023 Annual Report

Ascensus Environmental Covenant, January 15, 2021.

EPA Final Decision and Response to Comments issued to Callery, LLC, December 2018.

Callery, LLC, Post Remedial Care Plan, Groundwater Control Project, November 2018.

EPA Statement of Basis for Callery, LLC, October 2018.

Closure Report pursuant to DOJ Consent Decree, 2001.

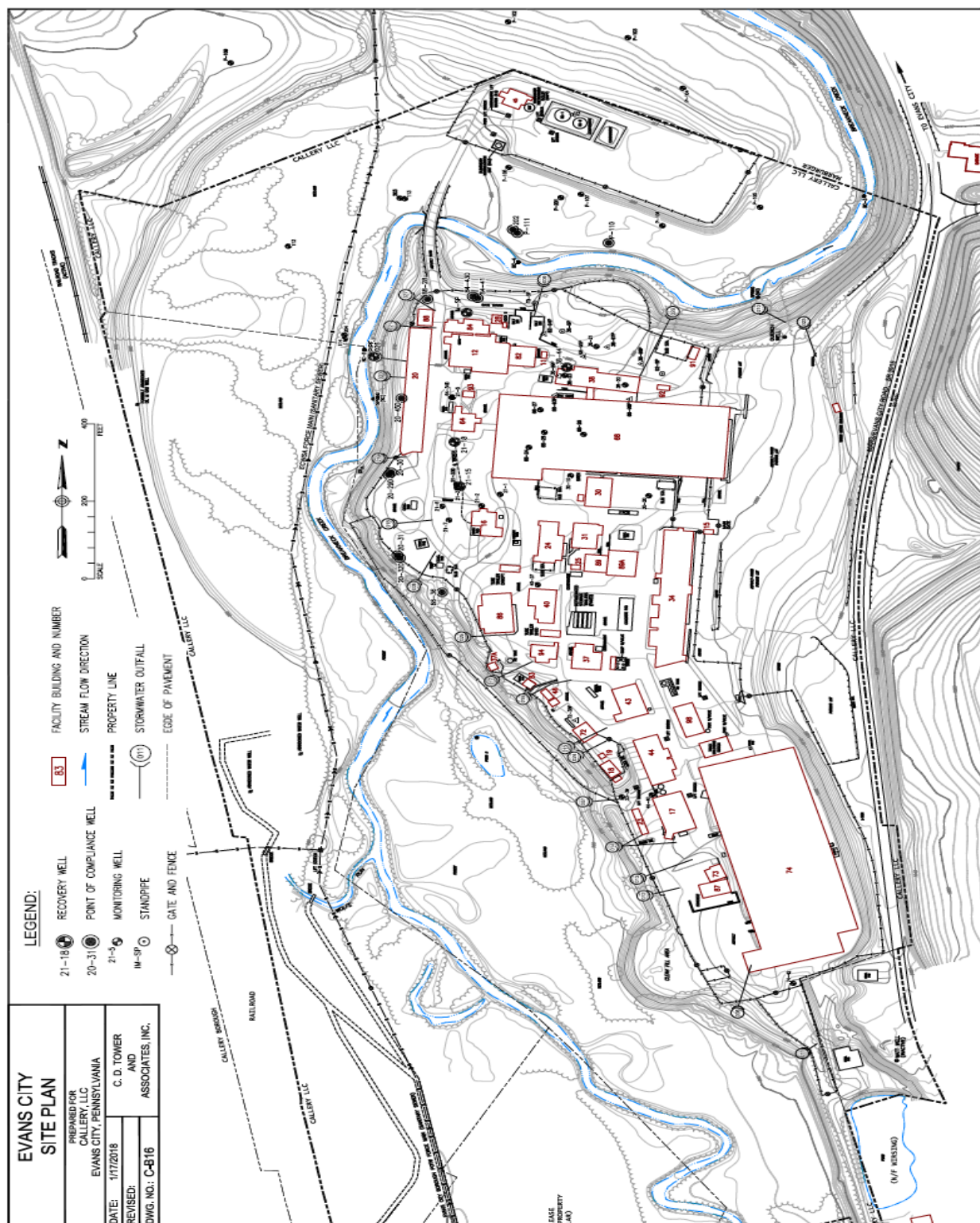


Figure 1 Site Map

Table 1
Corrective Action Remedy Summary
Areas of Implemented Engineering and Institutional Controls

Facility Name	Ascensus Specialties Callery LLC			
Address	1424 Mars-Evans City Road Evans City, PA 16033			
EPA ID Number	PAD004322913			
Are there restrictions or controls that address:	Yes	No	Areas	Description of restrictions, controls, and mechanism
Groundwater	x		Groundwater Exclusion Area	Restricts groundwater use via environ. covenant
Residential Use	x		Entire property	Restricts to non-residential use via environ. covenant.
Excavation		x		
Vapor Intrusion	x		Entire property	Construction of new buildings must address potential VI
Capped Areas		x		
Other Engineering Controls	x		Groundwater Exclusion Area	Groundwater remediation and monitoring
Other Restrictions		x		

LTS Checklist Template

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

<u>Groundwater Review and Assessment Questions:</u>	<u>Yes</u>	<u>No</u>	<u>Notes</u>
• Is groundwater onsite used for potable purposes?		x	
• Is the Facility connected to a public water supply?	x		
• Have any new wells been installed at the facility?		x	
• Are the current groundwater flow rate and direction similar as mentioned in the previous studies?	x		
• Groundwater contaminants stable or decreasing in concentration?	x		
• Are groundwater monitoring wells still in place (# wells)?	x		

• Any evidence or reason to re-evaluate the number and location of monitoring points and/or monitoring frequency?		x	
• For wells where groundwater monitoring is no longer required, have the wells be decommissioned?			N/A
• Is there evidence of monitored natural attenuation occurring in groundwater?			N/A -Active remediation
• Has (active remediation system) been maintained as necessary?	x		
• Is the (groundwater containment system) effectively containing COCs and protecting potential receptors (surface water body and/or groundwater resource) via hydraulic control?	x		
• Have notification letters been sent to the local POTW, County Department of Health, and Planning and Zoning Department regarding groundwater use restrictions?	x		

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

<u>Engineered Cap or Cover Review and Assessment Questions:</u>	<u>Yes</u>	<u>No</u>	<u>Notes</u>
• Have geosynthetic/vegetative landfill caps (name) been properly maintained?			N/A
• Have any repairs been necessary? (i.e. regrading, filling, root removal)			N/A
• Is the leachate collection system operating and effectively preventing groundwater contamination?			N/A

<u>Vapor Intrusion Review and Assessment Questions:</u>	<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

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

Appendix A

Photos



Manholes to route purged water to the onsite wastewater treatment system.



Nested Monitoring Wells



Monitoring Well



Active Carbon Groundwater Treatment System