



## **EXPLANATION OF SIGNIFICANT DIFFERENCES**

### **FULTON FINANCIAL REALTY COMPANY EAST PETERSBURG, PENNSYLVANIA EPA ID#: PAD082434747**

#### **I. INTRODUCTION**

This Explanation of Significant Differences (ESD) modifies the United States Environmental Protection Agency's (EPA) Final Remedy for the Fulton Financial Realty Company (Fulton) facility (Facility) by reducing the required frequency and scope of groundwater monitoring and requiring activity and use limitations as described in Section II.

On August 2, 2021, EPA issued a draft ESD describing EPA's proposed modifications and requested comments on the proposal. EPA did not receive any comments on the draft modifications. Therefore, the modifications to the Final Remedy as described in the draft ESD are hereby final.

The draft ESD is incorporated herein as Attachment 1. Please refer to the draft ESD for a detailed description of the modification to the Final Remedy. The September 25, 1997 Final Decision and Response to Comments (Final Decision) selecting the Final Remedy is incorporated herein as Attachment 2.

#### **II. MODIFIED REMEDY**

With this ESD, EPA is modifying the Final Remedy for the Facility by reducing the frequency and scope of groundwater monitoring to every five years plus three months at monitoring wells M-4, M-10, and the sump, provided that Fulton, or the then-current Facility owner, continues to operate the pump-and-treat system with a granular activated carbon (GAC) filter at the Facility until EPA provides written approval that the cleanup standards in the Final Remedy have been attained.

These modifications to the frequency and scope of the groundwater monitoring, as described above, are subject to the following activity and use limitations to be implemented through an environmental covenant, order, or permit:

1. The Facility shall not be used for residential purposes unless it is demonstrated to EPA that such use will not pose a threat to human health or the environment, and EPA provides prior written approval for such use. Residential use includes, but is not limited to, any improvement, structure, or dwelling used for living accommodations including single-family residences, apartments or condominiums, hospitals or other medical facilities, schools, childcare centers, senior centers for the elderly, or live-in nursing homes.
2. Groundwater at the Facility shall not be used for any purpose except for EPA-approved monitoring unless EPA provides prior written approval for such use.
3. Treatment of the groundwater by activated carbon in the sump system prior to discharge shall continue, existing monitoring wells shall remain operational, and monitoring at wells M4, M-

10, and the sump shall continue every five years plus three months until EPA has provided written approval that cleanup standards in the Final Remedy have been attained.

4. The then-current Facility owner shall conduct an annual well survey in coordination with appropriate representatives of East Petersburg Borough and East Hempfield Township to determine if any new wells are installed within a half-mile radius of the Facility that may impact the groundwater contaminant plume. If the annual groundwater well survey indicates that a well within a half-mile radius may cause the plume to migrate offsite, EPA shall evaluate the groundwater data and, if appropriate, propose a groundwater remedy modification, including re-initiation of groundwater monitoring at wells M-5, M-6, and M-9, to protect human health and the environment.

### **III. PUBLIC COMMENT PERIOD**

A public notice announcing the availability of and soliciting comments on the draft ESD was published in the *LNP* newspaper and on EPA's website on August 2, 2021. The 30-day comment period ended on September 1, 2021. EPA did not receive any comments on the draft ESD. Therefore, the modifications to the Final Remedy are unchanged from those described in the draft ESD.

### **V. DECLARATION**

Based on the Administrative Record compiled for this Corrective Action, I have determined that the modifications set forth in this ESD are appropriate and will be protective of human health and the environment.

09/21/2021

Date

---

Dana Aunkst, Director  
Land, Chemicals, and Redevelopment Division  
U.S. EPA Region III

Attachment 1: Draft ESD, July 7, 2021

Attachment 2: Final Decision, September 25, 1997