FAVIA PROTECTO

Long-Term Stewardship Assessment Report

GE Lighting - Bridgeville

EPA ID #: PAD060682622

Bridgeville, PA, 15017

Assessment Date: August 26, 2022

Remedy Assessment Summary:

The GE Lighting Facility has an environmental covenant in place to restrict groundwater usage, residential usage, and to maintain the engineering controls in place. The engineering controls include a security fence along the perimeter of the RCRA Landfill area, asphalt and concrete caps over the landfill area, and a sheet pile wall between the landfill area and Chartiers Creek.

<u>Introduction:</u> 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.

Facility Background:

Between 1919 and 1979, an estimated 53,000 cubic yards of production waste products from the plant was disposed in the RCRA Landfill Area. The materials consisted of cinders and ash from coal fired boilers, waste glass, sand, discarded furnace brick, and lead oxide material. Constituents of Concern in the material included arsenic, barium, cadmium, chromium, lead, and pH. A Hazardous and Solid Waste Amendments (HSWA) permit was issued by USEPA on October 31, 1990. Subsequent amendments to this permit in 1992 and 1993 outlined the corrective measures to be implemented on the property. After construction of the corrective measures, GE performed groundwater recovery and routine groundwater monitoring until USEPA approved discontinuation in 2020. At this time, the transition into post-remediation care occurred via an Environmental Covenant and Post Remediation Care Plan (PRCP). The Environmental Covenant and PRCP were approved by EPA and recorded with the Allegheny County in June 2022.

Current Site Status:

The site is currently unoccupied and is being actively advertised for sale by GE. Impermanent storage structures exist on the RCRA Landfill area on top of the asphalt and concrete caps. The Facility is no longer actively monitoring groundwater; the engineering controls are inspected and

maintained annually. At the time of the LTS site visit, the property was being prepared for new asphalt to be laid and surficial cracks on the top of the sheet piling to be repaired. It was anticipated this maintenance and improvements would be completed in Fall 2022.

GE is planning to sell the property within the next year. Currently, EPA is working on issuing a letter to terminate the HSWA permit as all corrective measures have been implemented and an Environmental Covenant and PRCP are in place. EPA will also issue a letter terminating the Financial Assurance requirement once the permit is terminated. These are anticipated to be completed by Fall 2022.

<u>Long-term Stewardship Site Visit</u>: On July 7, 2022, EPA conducted a long-term stewardship site visit with GE Lighting to discuss and assess the status of the implemented remedies at the Facility.

The attendees were:

Name	Organization	Email Address
Kristin Koroncai	US EPA Region 3	Koroncai.kristin@epa.gov
Gus Mergenthaler	Tetra Tech	Gus.mergenthaler@tetratech.com

<u>Implementation Mechanism(s):</u> The Implementation Mechanism is the method for implementing institutional controls required as a condition of the Statement of Basis and Final Decision. The ICs are described in Attachment 1 and are shown on Figure 1.

Financial Assurance:

EPA is currently in the process of terminating the financial assurance obligations required by the HSWA permit issued in 1990. It is anticipated that the permit, and then financial assurance, will be terminated within the next month.

Reporting Requirements/Compliance:

Per the Environmental Covenant and PRCP, the Facility is required to submit an annual report to Pennsylvania Department of Environmental Protection (PADEP) by January 31 each year. The EC was recorded in June 2022, so the first annual report will be due January 31, 2023.

Mapping:

The Facility property, landfill cap area, and retaining wall have been geospatially mapped.

Conclusions and Recommendations:

No deficiencies in the institutional or engineering controls were identified during the LTS site visit. Routine maintenance to these systems were actively in process during the visit. EPA has determined that the remedy institutional and engineering controls have been fully implemented and are effective in being protective of human health and the environment.

Attachments:

Figure 1: Map of GE Lighting Facility



Attachment 1: Remedial Summary Table

Facility Name	GE Lighting - Bridgeville					
Address	540	540 Mayer Street, Bridgeville, PA 15017				
EPA ID Number	PAD060682622					
Are there restrictions or controls that address:	Yes	No	Area(s)	Description of restrictions, controls and mechanism		
Groundwater Use	X		Entire property	No GW use, except for wells necessary to investigate or monitor groundwater conditions or to dewater the Property for construction purposes.		
Residential Use	Х		Entire property	Property shall not be used for any "unrestricted" or residential activity, including without limitation single-family or multi-family residences, apartments or condominiums, temporary living, hospital or other in-patient medical uses, schools for persons under eighteen (18) years of age, childcare centers, senior centers for the elderly or live-in nursing homes, playground, parks, or other outdoor recreational purposes.		
Excavation	Х		Entire property	Major disturbances require advance written notification to PADEP along with a summary of planned activity and planning documents that demonstrate the activities do not pose a threat to human health and the environment.		
Vapor Intrusion	X		Areas of existing caps	A vapor intrusion evaluation shall be performed prior to construction of new structures/buildings or additions to existing structures/buildings which involve disturbances to the existing caps.		
Capped Area(s)	Х		Asphalt/concrete cap over the entire exposed surface of the landfill and in the northern section of the property in the Former Manufacturing Area (FMA).	Any disturbance to capped areas would trigger a VI assessment. Annual inspection, or as required based on observations, shall be conducted and routine maintenance/repairs made promptly.		
Other Engineering Controls	X		Security fence at limits of the Landfill area. Sheep pile wall along the edge of the landfill immediately adjacent to Chartiers Creek.	Security fence, sheet pile walls are maintained in accordance with the PRCP. Security fence, sheet pile wall shall be inspected at least annually.		
Other Restrictions						

LTS Checklist – GE Lighting

IC Review and Assessment Questions:	Yes	<u>No</u>	Notes
• Have the ICs specified in the remedy been fully implemented? Implementation mechanism in place?			EC in place to restrict GW use, residential use, and maintenance of ECs
• Do the ICs provide control for the entire extent of contamination (entire site or a specific portion)?	X		
• Are the ICs eliminating or reducing exposure of all potential receptors to known contamination?	<u>X</u>		
• Are the ICs effective and reliable for the activities (current and future) at the property to which the controls are applied?	<u>x</u>		
• Have the risk of potential pathway exposures addressed under Corrective Action changed based on updated screening levels and new technologies?		<u>x</u>	
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?	<u>x</u>		GE plans to sell the property in the next year.
Have all reporting requirements been met?	<u>x</u>		The first report required by the EC/PRCP will be due 1/31/2023.

Groundwater Review and Assessment Questions:		<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?		<u>X</u>	
Are the current groundwater flow rate and direction similar as mentioned in the previous studies?			N/A- monitoring ceased in 2019 after EPA approval. Wells were decommissioned.
• Groundwater contaminants stable or decreasing in concentration?	<u>x</u>		MCLs were determined to have been achieved in 2019
Are groundwater monitoring wells still in place (# wells)?		<u>x</u>	
• Any evidence or reason to re-evaluate the number and location of monitoring points and/or monitoring frequency?			N/A
• For wells where groundwater monitoring is no longer required, have the wells be decommissioned?	<u>x</u>		
Is there evidence of monitored natural attenuation occuring in groundwater?			N/A – MCLs have been achieved
Has (active remediation system) been maintained as necessary?			N/A – MCLs have been achieved
• Is the (groundwater containment system) effectively containing COCs and protecting potential receptors (surface water body and/or groundwater resource) via hydraulic control?			N/A – MCLs have been achieved
Have notification letters been sent to the local POTW, County Department of Health, and Planning and Zoning Department regarding groundwater use restrictions?			Unknown- will follow up with facility and request letters be sent if they have not already.

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

Engineered Cap or Cover Review and Assessment Questions:	Yes	<u>No</u>	Notes
Have geosynthetic/vegetative landfill caps (name) been properly maintained?	х		The concrete/asphalt caps have been maintained
Have any repairs been necessary? (i.e. regrading, filling, root removal)	x		GE is planning to repave asphalt and repair surficial crack in concrete in summer 2022.
Is the leachate collection system operating and effectively preventing groundwater contamination?			N/A

Vapor Intrusion Review and Assessment Questions:	Yes	No	<u>Notes</u>
Have there been construction of new structures within the vapor intrusion restriction zone(s)?		<u>x</u>	
• 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?	<u>x</u>		
Is the appropriate signage posted?	<u>x</u>		