



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
Lear Corporation - Lear Dye and Finishing Plant
EPA ID: PAD002377703
1 Penn Dye Street
Pine Grove, PA 17963

DATE: April 17, 2023

TO: Alizabeth Olhasso, Chief
RCRA Corrective Action Section South

FROM: Priscilla Ortiz, RPM
Long-Term Stewardship File for Lear Corporation
RCRA Corrective Action Section South

REMEDY ASSESSMENT SUMMARY:

On September 29, 2015, in a Final Decision and Response to Comments (FDRTC or Final Remedy), EPA announced its selection of a final remedy for Lear Corporation (Lear/Facility) located at 1 Penn Dye Street, Pine Grove, PA. The Final Remedy requires the continuation of pumping and treatment of groundwater until Maximum Contaminant Levels (MCLs) are met or EPA determines such activity is no longer necessary, maintaining the existing asphalt cap in compliance with the EPA approved Post Remediation Care Plan (PRCP) and implementing land and groundwater use restrictions designed to minimize the potential for human exposure to contaminants. EPA concludes the Facility meets the objectives of the 2015 FDRTC and 2018 Environmental Covenant (EC).

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.

FACILITY BACKGROUND:

The Lear Corporation – Lear Dye and Finishing Plant (formerly Guilford Mills, LLC) consists of 33-acres located at the intersection of Penn Dye Street and Tulpehocken Street in Pine Grove Borough, Schuylkill County, Pennsylvania. Swatara Creek divides the Facility roughly in half and flows to the southeast in the vicinity of the Facility. The Facility consists of a main

manufacturing building, a wastewater treatment plant, and a man-made reservoir. Since 1960, the Facility has been used to dye and finish textiles.

In 1989 former Guilford Mills, Inc. discovered soil and groundwater contamination had occurred at the Facility as the result of industrial operations. In September 1992 the Facility entered into a Consent Decree with EPA and completed various investigations and remedial actions to address this contamination. Pursuant to the Order, the Facility began pumping groundwater from three production wells to provide containment of contaminated groundwater, installed a granular activated carbon treatment system to treat contaminated water pumped from the most-impacted production well, and continued use of the on-site reservoir for storage of pumped groundwater. The Order also required the Facility to conduct a RCRA Facility Investigation (RFI) and prepare a Corrective Measures Study (CMS).

As a result of these efforts, the groundwater and soil contamination at the Facility have been significantly reduced. However, tetrachloroethylene (PCE), trichloroethylene (TCE), 1,1-dichloroethene (1, 1-DCE), cis-1,2-dichloroethene (cis-1,2DCE), and vinyl chloride (VC) were found at levels exceeding their applicable MCLs in a limited number of groundwater monitoring wells, and their applicable Regional Screening Level for residential soil in areas covered by an existing asphalt cap.

In December 2003 a soil vapor extraction (SVE) system was installed and began operations as a remedy for soils. The permanent shutdown of the soil SVE system was approved in September 2011 after a temporary shutdown and soil sampling event demonstrated that the system had adequately remediated soils in the source area beneath the Facility.

The alternative remedial measure of an aeration system in lieu of the carbon adsorption system to further reduce the low levels of remaining groundwater contamination beneath the Facility was approved in May 2012. Results from an 8-month pilot study of the aeration system demonstrated that the performance of the system (i.e., chlorinated volatile organic removal efficiency) is comparable to the removal efficiency of the carbon adsorption system.

Lear submitted a Resource Conservation and Recovery Act (RCRA) Closure Report in April 2015, that included the characterization of sediments in the water reservoir, the performance of a well survey, and the discussion of institutional and engineering controls anticipated to be part of the Final Remedy for the Facility. Results from the sediment sampling suggested that the reservoir is not contaminated above appropriate risk-based levels. The well survey identified 17 wells within a half-mile radius of the Facility; however, none of these wells are used for potable purposes as all properties within this area are served by a public water supply. Finally, an analysis of the groundwater pumping system demonstrated that it maintains capture of contaminated groundwater on-site and could thus be used as a component of the Final Remedy for the Facility.

On September 29, 2015, EPA selected a Final Remedy for the Facility in a FDRC. The terms of the Final Remedy are as follows:

1. Soils

- Implement and comply with an EPA-approved Post Remediation Care Plan specifying

how the asphalt cap over the area surrounding the manufacturing building shall be maintained to limit the migration of contaminants into the groundwater.

- Because contaminants will remain in Facility soils above levels appropriate for residential use, the proposed remedy for soils includes land use restrictions to restrict the Facility to non-residential. The proposed use restriction will be implemented through an institutional control such as an enforceable permit, order and/or Environmental Covenant pursuant to the Pennsylvania Uniform Environmental Covenants Act, 27 Pa. C.S. Sections 6501-6517 (UECA) to be recorded with the deed for the Facility Property.

2. Groundwater

- Pump groundwater at the Facility at a rate sufficient to prevent the off-site migration of contaminants in excess of MCLs;
- Treat the pumped groundwater to reduce concentrations of chlorinated VOCs to allow 1) its use in manufacturing operations, 2) its discharge into Swatara Creek under NPDES permit, or 3) its discharge to the local municipal sewer under permit with the municipal sewer authority, and
- Perform annual groundwater sampling of wells CMS-1S, CMS-1D, M11D, PW-1 and PW-4 for PCE and its degradation products.

On February 2, 2018, EPA issued an Environmental Covenant with the following activities and use limitations:

- The Facility shall not be used for residential purposes.
- Groundwater may be used for industrial purposes; however, groundwater shall not be used as potable water.
- Comply with the terms of the PRCP.
- On an annual basis and when requested by PADEP or EPA, submit a written certification of compliance with all terms of the Final Remedy.
- The Facility shall not be used in any way that would adversely affect the protectiveness of the Final Remedy.

EARTHRES workers conducted the 2022 annual groundwater sampling event at the Lear site on August 17, 2022. RCRA monitoring wells M11D, CMS-1D, and CMS-1S, as well as production wells PW-1 and PW-4, were used to collect groundwater samples. A PADEP official was on-site during this sampling session to evaluate sample collection techniques and collect split-samples. An analysis of the VOCs tested during the 2022 annual groundwater sampling event revealed that most of the VOCs were either not measured over the laboratory reporting limit (RL) or remained within their respective historical ranges. EPA MCL exceedances were observed at monitoring well M11D (PCE), and at production well PW-4 (PCE and TCE). No EPA MCL exceedances were observed at monitoring wells CMS-1S and CMS-1D and production well PW-1 during the 2022 annual groundwater sampling event.

CURRENT SITE STATUS:

Lear continues to operate as a synthetic fabric dyeing and finishing facility. Groundwater Pump and Treat System is operating, asphalt capped areas are inspected monthly, and the groundwater sampling event is conducted annually. Areas of the asphalt cap require maintenance and Lear is scheduled to complete this work during 2023.

INSTITUTIONAL CONTROLS (ICs) STATUS:

An Environmental Covenant restricts the Facility land use to non-residential purposes and prohibits groundwater use for any purpose other than industrial usage.

ENGINEERING CONTROLS (ECs) STATUS:

Engineering controls include maintenance of the existing asphalt cap to limit the migration of contaminants into groundwater, and the pump and treat system to prevent off-site migration of groundwater contaminated above MCLs and reduce concentrations of chlorinated volatile contaminants in groundwater.

MAPPING:

The Facility property boundary has been geospatially mapped. The geospatial map is available at the Facility's EPA Factsheet (<https://www.epa.gov/hwcorrectiveactioncleanups/hazardous-waste-cleanup-penn-dye-and-finishing-plant-pine-grove>) under the "Reports, Documents and Photographs" section.

CONCLUSION:

EPA concludes that the implemented remedies are effective in meeting the objectives of protection of human health and the environment. Lear Corporation will continue to implement the remedies set forth in the FDRC and Environmental Covenant. To ensure that ICs and ECs are consistent and continued to be enforced at the Facility, Lear will submit results of annual groundwater sampling events. The Pump and Treat System continue to demonstrate that the pumping of PW-1 and PW-4 influence the deep aquifer and prevent the offsite migration of contaminants in excess of the MCLs. During 2022, Lear personnel completed monthly inspections of the asphalt capped area. Areas of the asphalt cap require maintenance and Lear is scheduled to complete this work during 2023.

FILES REVIEWED

Environmental Indicator Groundwater, Prepared by EPA January 2002

Environmental Indicator Human Health, Prepared by EPA January 2002

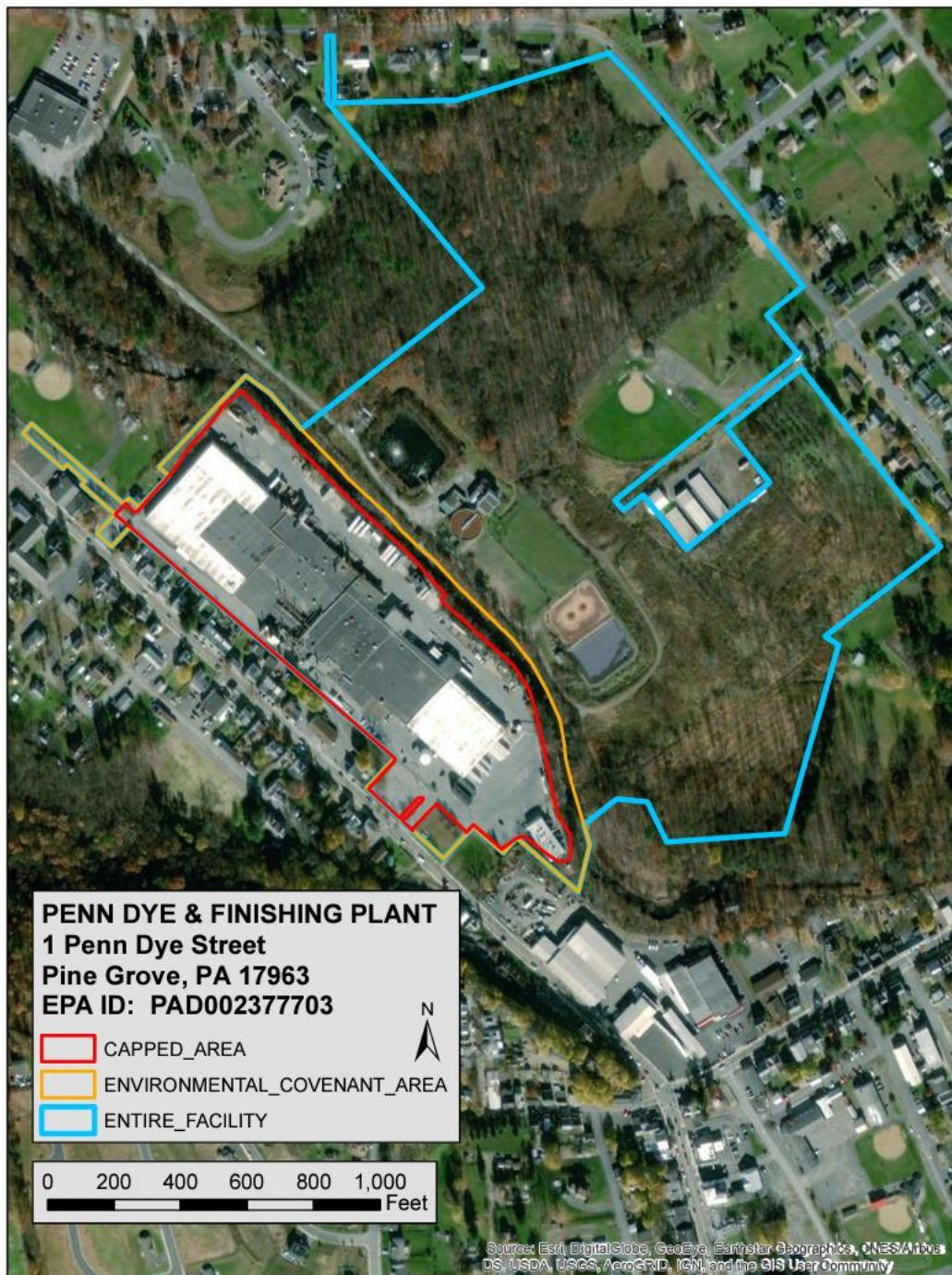
Statement of Basis, Prepared by EPA August 2015

Final Decision and Response to Comments, Prepared by EPA September 2015

Environmental Covenant, Prepared by EPA February 2018

2022 Certification of Compliance- Final Remedy, Prepared by EARTHRES Group, Inc. April 2023

Map of Facility



Engineering Control/Institutional Control
Corrective Action Remedy Summary

Facility Name	Lear Corporation - Lear Dye and Finishing Plant			
Address	1 Penn Dye Street, Pine Grove, PA 17963			
EPA ID Number	PAD002377703			
Are there restrictions or controls that address:	Yes	No	Areas	Description of restrictions, controls, and mechanism
Groundwater	x		Entire Facility	Industrial or remedial purposes only.
Residential Use	x		Entire Facility	Nonresidential use only.
Excavation		x		Contaminated soil was removed.
Vapor Intrusion		x		
Capped Areas	x		Entire Facility	The area surrounding the manufacturing building was capped with asphalt.
Other Engineering Controls	x			Groundwater Pump and Treat System currently active
Other Restrictions	x			Use of groundwater on site without treatment is prohibited.

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		
• 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?	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	Groundwater is restricted to industrial and remedial purposes.
• 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?		x	
• Is there evidence of monitored natural attenuation occurring in groundwater?	x		
• 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?			N/A

<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?	x		N/A
• Have any repairs been necessary? (i.e. regrading, filling, root removal)	x		A 2022 inspection observed that some areas required maintenance. This work will be completed in 2023.
• Is the leachate collection system operating and effectively preventing groundwater contamination?			N/A