



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, Pennsylvania 19103-2852

SUBJECT: Long-Term Stewardship Assessment
Viant Collegeville LLC
EPA ID: PAD002344463
200 West Seventh Ave.
Trappe, PA 19426

DATE: May 8, 2023

TO: Alizabeth Olhasso, Chief
RCRA Corrective Action South Section

FROM: Priscilla Ortiz, RPM
Long-Term Stewardship File for Viant Collegeville LLC
RCRA Corrective Action South Section

REMEDY ASSESSMENT SUMMARY:

On September 30, 1991 in a Final Decision and Response to Comments (FDRTC or Final Remedy), EPA announced its selection of a final remedy for Viant Collegeville LLC (Facility) located at 200 West 7th Avenue in the Borough of Trappe, Montgomery County, Pennsylvania. On May 27, 2016, EPA issued a proposed Explanation of Significant Differences (ESD) modifying the United States Environmental Protection Agency's (EPA) Final Remedy for the Viant Collegeville LLC. The ESD required establishment of technical impracticability zone, groundwater monitoring, reporting, hydraulic control, and institutional controls. Based on the site visit and file review information gathered, EPA concludes the Facility meets the objectives of the 1991 FDRTC, 2016 ESD, 2018 Post Remediation Care Plan (PRCP), 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:

Viant Collegeville LLC (formerly UTI Holdings LLC) consists of approximately 40 acres located at 200 West 7th Avenue in the Borough of Trappe, Montgomery County, Pennsylvania.

Operations at this Facility began in 1964 and continue today. Viant manufactures high-precision, small diameter metal tubing and tubular parts.

As a result of manufacturing at the Facility, groundwater at the Facility and off-site locations near the Facility became contaminated with volatile organic compounds (VOCs) and chromium. Contaminated groundwater has been remediated in accordance with the EPA's selected corrective measure described in the 1991 FDRTC and as required by the 1992 Administrative Order of Consent. The remedy selected consists of groundwater extraction and remediation and soil vapor extraction to treat trichloroethylene (TCE), 1,1,1 trichloroethane (TCA) and chromium contaminated groundwater, and establishment of Institutional Controls requiring drinking water well installations controlled by the Montgomery County Health Department's permitting process.

After 27 years of continuous pumping, drinking water standards have been achieved beyond the Facility boundary, however, EPA has determined that achieving drinking water standards immediately beneath the source areas located within the Facility boundary is not feasible from an engineering perspective. Effective 5/27/2016, EPA issued an Explanation of Significant Differences (ESD) that modified the Final Remedy for the Facility in the FDRTC. The modified remedy includes the following:

- 1) Establishment of a technical impracticality (TI) Zone with long term groundwater monitoring and reporting of contaminants of concern (COCs) and hydraulic control of groundwater.
- 2) Compliance with and maintenance of groundwater use restrictions to be implemented through institutional controls (Environmental Covenant (EC) recorded on 12/18/2018 in the Recorder of Deeds Office in Montgomery County, Pennsylvania).

As required by the EPA-Approved PRCP of the EC, an Annual Progress Report has been submitted to EPA since 2019. The 2022 Report showed that the sampling indicates each point of compliance well for the TI boundary remains below the Maximum Contaminant Level (MCL) and groundwater quality and elevation measurements indicate the pumping system is effective at keeping VOC contamination within the TI boundary. The TI Zone monitoring wells detected TCE and TCA at concentrations consistent with past sampling events. The TCE and TCA concentrations continue to show a long-term decreasing trend in the site groundwater. Chromium has previously been documented as having attained the cleanup goal in all the site monitoring wells therefore analysis for chromium is no longer required. In the past, Viant monitored the site for total and hex chromium, but it was discontinued for the reasons mentioned above.

SITE VISIT:

On March 29, 2023, EPA conducted a site visit with Viant representatives to discuss and assess the status of the implemented remedy at the Facility which included engineering and institutional controls.

The attendees were:

Name	Company/Organization	Telephone	Email
Priscilla Ortiz	USEPA	(215) 814-3428	ortizcarrero.priscilla@epa.gov

Darin Hilbert Michael	Viant Collegeville, LLC	(610) 409-2348	Darin.Hilbert@viantmedical.com
DellaPolla	Viant Collegeville, LLC	(610) 409-2245	Michael.DellaPolla@viantmedical.com
Tom Marks	Marks Environmental, Inc.	(610) 909-8250	trm.mei@comcast.net
Peter Puglionesi	Applied EHS Mngmt.	(610) 449-3430	peter.puglionesi@appliedehs.com
Adam Doubleday	Montrose Environmental	(610) 840-9141	adoubleday@montrose-env.com

During the site visit EPA inspected the Groundwater Pump and Treat System. No malfunction or equipment failure were observed. Tank T-1 was cycling normally with no risk of overflow. Recovery wells UTM-1 and UTM-11 did not present any leaks or vibrations. EPA observed wells around the site and were well maintained. Viant stated that inspections to the Groundwater Pump and Treat Systems are conducted daily, weekly, monthly, and quarterly.

Viant proposed to replace the current low-flow sampling method to Passive Diffusion Bag (PDB) sampling. The Facility informed EPA that during the February 2023 sampling event the Facility performed a VOC comparison study on two wells, UTM-4 and UTM-20, which indicated that PDBs will provide representative results that compare well to the historic database. In an email dated 04/13/2023, EPA approved this proposal.

CURRENT SITE STATUS:

Viant continues to operate as a manufacturer of high-precision, small diameter metal tubing and tubular parts. Groundwater recovery system is operating, and the next sampling event will be conducted during February of 2023.

INSTITUTIONAL CONTROLS (ICS) STATUS:

An Environmental Covenant was recorded on 12/18/2018 in the Recorder of Deeds Office in Montgomery County, Pennsylvania. The EC prohibits the use of contaminated groundwater at the Facility. An Annual Progress Report is submitted to EPA in accordance with the reporting requirements of the PRCP.

ENGINEERING CONTROLS (ECS) STATUS:

A groundwater recovery and treatment system shall be operated with groundwater recovery from UTM-1 and/or UTM-11 at the Facility, as required by the PRCP. Viant prepared an operation and maintenance manual for the treatment system. Sampling shall be performed in accordance with the requirements of the PRCP at the TI Zone and Perimeter monitoring well locations for trichloroethylene and 1,1,1 trichloroethane.

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-viant-collegeville-llc-formerly-lake-regional>) 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. Viant will continue to implement the remedies

set forth in the ESD. The next groundwater sampling round is scheduled for February 2024. After approval of the PDB sampling method on 04/13/2023, the change will be incorporated into an updated PRCP by including the PDB sampling procedures in the revised PRCP. The revised PRCP will be recorded to the property deed to replace the current PRCP.

FILES REVIEWED:

Final Decision and Response to Comments, Prepared by EPA September 1991

Administrative Order on Consent, Prepared by EPA March 1992

Explanation of Significant Differences, Prepared by EPA May 2016

Post Remediation Care Plan, Prepared by Marks Environmental, Inc., June 2018

Environmental Covenant, Prepared by EPA December 2018

Annual Progress Report, Prepared by Marks Environmental, Inc., May 2019

Annual Progress Report, Prepared by Marks Environmental, Inc., May 2020

Groundwater Abatement System Periodic Inspection Procedure, Prepared by Viant, March 2021

Annual Progress Report, Prepared by Marks Environmental, Inc., May 2021

Annual Progress Report, Prepared by Marks Environmental, Inc., May 2022

Map of Facility



Engineering Control/Institutional Control
 Corrective Action Remedy Summary

Facility Name	Viant Collegeville LLC			
Address	200 West Seventh Ave. Trappe, PA 19426			
EPA ID Number	PAD002344463			
Are there restrictions or controls that address:	Yes	No	Areas	Description of restrictions, controls, and mechanism
Groundwater	x		Entire Facility	Use of contaminated groundwater on site is prohibited.
Residential Use		x		
Excavation		x		
Vapor Intrusion		x		
Capped Areas		x		
Other Engineering Controls	x			Groundwater Pump and Treat System currently active.
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		
• 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	
• 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?	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?			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