



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

SUBJECT: Long-Term Stewardship Assessment
Electroplaters of York Inc.
EPA ID: PAD015139470
209 E. Willow Street
Wrightsville, PA 17368

DATE: August 22, 2023

TO: Alizabeth Olhasso, Section Manager
Long Term Stewardship File for Electroplaters of York Inc.
RCRA Corrective Action

FROM: Kristin Koroncai, Remedial Project Manager

Remedy Assessment Summary:

On June 28, 2023 the United States Environmental Protection Agency's (USEPA) Land, Chemicals, and Redevelopment Division (LCRD) representative, Kristin Koroncai, conducted a long-term stewardship (LTS) assessment site visit of the Electroplaters of York (EYP, Facility) in Wrightsville, PA. This LTS will be recorded as a Pass- Minor Maintenance due to the considerations outlined in the Conclusions and Recommendations section, below.

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 Facility is located on a 5.35-acre parcel in the Borough of Wrightsville, York County, Pennsylvania. The Facility includes an office building (currently used as office space by Wrightsville Borough), a 1-story warehouse building, small storage building, concrete surfaces (floor slabs of the previous on-site production facility), and 2 inactive production wells (Figure 2). The Facility was an electroplating facility that was contracted by various businesses who supplied EYP with prefabricated metal components for custom electroplating. The operations included plating with zinc, cadmium, chromium, nickel, brass, and silver, pickling steel, and depositing electroless nickel. The Facility also conducted wastewater treatment for the destruction of cyanide, chromium reduction, chemical precipitation, flocculation, coagulation, settling, and sludge dewatering, and used trichloroethene (TCE) for vapor degreasing. EYP

conducted operations at the Facility from 1968 until December 21, 2004. The Facility experienced an industrial fire which destroyed the production facility and damaged the finished work warehouse connected to the north end of the production facility building. EPY became a dissolved entity in 2004.

Previous to EYP's production at the Facility, the site was occupied by the Wrightsville Hardware Company from the 1800s until the mid-1960s. The Wrightsville Municipal Borough Authority (WBMA) purchased the site in 2006 with possible plans to redevelop for expanded operations and/or potentially as part of a public, riverside park.

The Facility issued a Notice of Intent to Remediate pursuant to PADEP's Act 2 in 2011. Soil and groundwater was characterized and were compared to non-residential standards for the contaminants of concern (COCs) (total petroleum hydrocarbons, volatile organic compounds, priority pollutant metals, cyanide, and semi-VOCs), as the future use proposed included prohibition of residential development. Direct contact soil standards were determined to be within EPA's acceptable non-residential Regional Screening Level (RSL) risk range for Corrective Action, and groundwater standards were equivalent to EPA's Maximum Contaminant Levels (MCLs).

Soils exceeded the RSLs for arsenic, cadmium, lead, and benzo(a)pyrene. Groundwater exceeded the MCLs for TCE, vinyl chloride, and chromium. Bulk soil samples were used to determine exceedances of vapor intrusion screening values; exceedances of the Medium Specific Concentration (MSC) were found for Acrolein, methylene chloride, and TCE. The EPA Final Decision (5/1/2020) remedy included activity and use limitations (proposed mechanism as an environmental covenant) to prohibit the use of groundwater, residential use, soil excavation and disturbance limitations and requirements, and periodic inspections and maintenance to ensure engineering and institutional controls function as intended. The Final Decision also states that future use of the existing warehouse building, or any new buildings constructed would require a vapor intrusion assessment, as well as additional monitoring of groundwater for dissolved chromium to demonstrate the stability of these concentrations. Additional monitoring of groundwater for dissolved chromium was completed in October 2020, and results were below the MSC.

Current Site Status:

The site is currently used as office space by the Borough as well as for some limited equipment and material storage in the warehouse building and former plant area. An aboveground diesel fuel tank was observed on the Eastern side of the structure located closest to the corner of Water Street and Willow Street. The paved areas within the fencing are in very poor condition with substantial cracking. Fencing around the property was intact and in satisfactory condition. However, it was noted that the fenced area does not encompass the entire area of soils with direct contact exposure concerns (Figure 1). Monitoring wells MW-1, 2, 3, 4, and 5 were observed to be in satisfactory condition and well-marked (Figure 2); well labeled EP Well #1 was noted to have a missing cap but is not part of the current monitoring network. Fisherman were observed along the riverbank on the property during the site visit. An environmental covenant has not been recorded on the property.

During the site visit, future use of the property was discussed. At this time, the WBMA has conceptual plans for the property that consist of repaving the currently paved areas to create a parking lot and demolishing the warehouse building (keeping the foundation in place) to extend the parking area. The grassed area adjacent to the River will remain, with a recreational trail constructed along the riverbank to connect the adjacent park and trails throughout the Borough. A boat ramp is planned to be constructed at the dead-end of Lemon Steet, adjacent to the property. It was noted by EPA and PADEP representatives that this proposed use would require assessment of residential standards, and both agencies requested continued coordination as the Borough beings to develop these plans to ensure that any work would remain protective of human health and the environment.

On January 14, 2021, the WBMA requested from EPA and PADEP a five-year extension to submit the Final Report (Act 2) and record the environmental covenant. EPA granted this extension, and the Final Report and environmental covenant are expected to be submitted by January 14, 2026.

Long-term Stewardship Site Visit:

A site visit was conducted on June 28, 2023. The visit included a walk-through inspection of the property.

The attendees were:

Name	Organization	Email Address
Kristin Koroncai	US EPA Region 3	Koroncai.kristin@epa.gov
Brian Lyle	WBMA	bklwbma@msn.com
Christian Alarie	PADEP	calarie@pa.gov
Ryan Carr	PADEP	rcarr@pa.gov
Pamela Trowbridge	PADEP	ptrowbridg@pa.gov

Implementation Mechanism(s):

The Implementation Mechanism is the method for implementing IC and ECs required as a condition of the Statement of Basis and Final Decision. The summary of implementation mechanisms are described in Attachment 1.

Financial Assurance:

Financial Assurance was not required in the Final Decision, as costs associated with the proposed remedy (including maintenance and an Environmental Covenant) are estimated to be less than \$10,000 per year.

Reporting Requirements/Compliance:

The Final Decision did not include any reporting requirements if the site use does not change. Further investigation and reporting may be required if there is a proposed change in site use, as outlined in the Final Decision.

Mapping:

The Facility area has not yet been geospatially mapped and entered into the R3 Corrective Action geodatabase. This will occur when an environmental covenant is recorded on the property.

Conclusions and Recommendations:

The conditions at the Facility have remained unchanged since the Final Decision was published in 2020. Conversations with the Facility representative during the LTS site visit confirmed that future use of the property is planned to be a publicly accessible park and parking lot area. With that, the following recommendations are made:

1. If redevelopment plans progress with intention to construct a publicly accessible park, it is suggested that the remedy is reevaluated using residential standards to determine whether it is protective of human health and the environment.
2. Record an environmental covenant on the property with activity and use restrictions outlined in the 2020 Final Decision. PADEP and EPA have approved an extension to January 14, 2026 to submit a Final Report and Environmental Covenant; at the time of this LTS that is still the expectation.
3. Assess every 1-2 years the use of the Facility to determine whether an unacceptable risk to public health is present. If an assessment reveals that site usage that is different than what was considered in the Final Decision, then interim measures should be put in place to prevent public access to the area of direct contact exposure concerns (Figure 1).
4. Map the Facility and enter it into R3's Corrective Action geodatabase. This is anticipated to be completed when the Environmental Covenant is recorded.

Files Reviewed:

Final Decision and Response to Comments, Electroplaters of York Inc., Wrightsville, Pennsylvania. US EPA, May 1, 2020.

Statement of Basis, Electroplaters of York Inc., Wrightsville, Pennsylvania. US EPA, March 2020.

Dissolved chromium groundwater sampling results. ALS Environmental. October 13, 2020.

Enc.:

Figures

Attachments

Figure 4B

Map of facility and non-residential direct contact soil exceedances (orange highlighted area)

LEGEND

- Estimated Extent of Former Property Boundary
- Areas of Concern
- Shallow Soil Sample Collected (0-2' bgs)
- Deep Soil Sample Collected (>2' bgs)
- Shallow and Deep Soil Sample Collected
- Soil Boring from Previous Firm
- Test Pit from Previous Firm
- Former Location of Canal (estimated)

Scale in Feet

PA South State Plane Coordinates NAD 1983

Areas of Concern - Soil

- The Warehouse Building
acrolein, arsenic, and lead
- Former TCE Storage Pond
No COCs exceed any MSCs
- Former Neutral Waste Treatment Tanks
benzo(a)pyrene, TCE, arsenic,
cadmium, chromium, nickel, selenium, and thallium
- Former Open Sludge Pit
benzo(a)pyrene, arsenic, cadmium, chromium,
lead, and thallium
- Southern End of the Former Foundation Building
benzo(a)pyrene, antimony, arsenic, cadmium, and
chromium

Monitoring Well Locations

Wrightsville Borough
York County, Pennsylvania
Former Electro-Platers of York Facility

Scale: 1" = 100'

North Arrow

Figure 9

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Figure 3. Photograph of property facing North, at the corner of Water Street and Willow Street.



Figure 4. Photograph of property facing South. The brick building on the right is the occupied office building, and the white building on the left is the warehouse building.



Attachment 1: Remedial EC/IC Summary Table.

Facility Name	Electroplaters of York, Inc.			
Address	209 E. Willow Street, Wrightsville, PA 17368			
EPA ID#	PAD015139470			
Are there restrictions or controls that address:	Yes	No	Area(s)	Description of restrictions, controls, and mechanisms
Groundwater Use		X		An environmental covenant has not yet been recorded.
Residential Use		X		An environmental covenant has not yet been recorded.
Excavation		X		An environmental covenant has not yet been recorded.
Vapor Intrusion		X		An environmental covenant has not yet been recorded.
Capped Area(s)		X		An environmental covenant has not yet been recorded.
Other Engineering Controls	X		Fenced area	There is a limited area surrounded by fencing, however it does not encompass the entirety of the area of concern for soil contamination.
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	An environmental covenant has not yet been recorded.
• 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		The Final Decision evaluated a non-residential use scenario, however redevelopment intentions would require a residential use evaluation.
• Are modifications to the IC implementation mechanism needed? (i.e. UECA Covenant, Permit or Order)	x		An environmental covenant needs to be recorded, after reevaluation of the protectiveness of the Final Decision.
• Are there plans to develop or sell the property?	x		The property is intended to be redeveloped into a public park and parking lot area.
• Have all reporting requirements been met?		x	Additional groundwater monitoring for dissolved chromium has not been reported, as required in the Final Decision.

<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?			Unknown. The most recent information was that reviewed during development of the Final Decision.
• Groundwater contaminants stable or decreasing in concentration?			Unknown. The most recent information was that reviewed during development of the Final Decision. Results of additional monitoring for dissolved chromium have not been provided and it is unknown if samples have been collected.
• 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?			Unknown. The most recent information was that reviewed during development of the Final Decision.
• Has (active remediation system) been maintained as necessary?			N/A. No active remediation system was required.
• Is the (groundwater containment system) effectively containing COCs and protecting potential receptors (surface water body and/or groundwater resource) via hydraulic control?			N/A. No active remediation system was required.

• Have notification letters been sent to the local POTW, County Department of Health, and Planning and Zoning Department regarding groundwater use restrictions?		x	No. An environmental covenant has not yet been recorded.
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<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)	x		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)?		x	

• Is the vapor intrusion mitigation system radius of influence effective for the structure in which its installed?			N/A
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<u>Miscellaneous Review and Assessment Questions:</u>	<u>Yes</u>	<u>No</u>	<u>Notes</u>
• Is the security fence intact?			The fence is in tact, however it does not encompass the entirety of the area of concern for direct soil exposure.
• Is the appropriate signage posted?		x	No signage was posted.