



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

SUBJECT: Long-term Stewardship
CEMAD Properties, LLC (CEMAD)
Former Coinco Inc. (Coinco)
EPA ID: PAD056882822
125 High Street
Cochranton, PA 16314

DATE: September 8, 2023

TO: Alizabeth Olhasso, Manager
RCRA CA South Section

FROM: Khai Dao, RPM
RCRA CA South Section

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.

Remedy Assessment Summary:

In 2022, Coinco Inc. closed their business and listed the property for sale. CEMAD Properties, LLC (CEMAD) purchased the property on May 18, 2023. Under the 2023 PADEP Consent Order and Agreement (CO&A) with CEMAD, CEMAD will continue to monitor groundwater to confirm that the onsite groundwater plume remains stable, and the levels of VOCs continue to steadily decrease through natural attenuation. In addition, CEMAD will conduct an annual survey of downgradient properties within a half mile radius of the site to identify any new groundwater receptors that may potentially impact the onsite groundwater plume.

The property is connected to public water. There is no direct exposure to the onsite groundwater contamination. Concentrations of VOCs in groundwater continue to decrease through natural attenuation. The contaminant plume is located in open space and not near any buildings on the property. The potential for indoor vapor intrusion is negligible. A local ordinance requires that all properties in the town of Cochranton be connected to public water. Institutional controls executed through a property deed restriction prohibits any groundwater use. The property is restricted to non-residential use.

Based on the site visit and file review information gathered, EPA concludes that the Facility is meeting the objectives of the 2023 PADEP CO&A.

Facility Background:

The former Coinco facility is approximately 10 acres and is located in Cochran, PA. Coinco manufactured specialty advertising products. The manufacturing process consisted of lettering, painting and assembling of component parts. In the production process, some articles required an application of paint. This paint was applied in a spray booth which periodically required cleaning. The paint sludge removed during cleaning was placed in an Auto-Vac Filter where the liquid and solids were separated. The liquid is poured in the drain which discharged to the lagoon to be recycled back into the painting process. The solids were then transferred into drums and transported to an approved facility as hazardous wastes. The spray booth residuals contained toluene and other organic solvents. Low levels of metals were sometimes detected depending on the pigment use of the batch. All residual sludges were shipped offsite for disposal.

In 1986, an investigation was conducted to evaluate soils and groundwater as part of the closure of the former surface impoundment. Contaminated soils from the former impoundment were excavated and shipped offsite for disposal. Coinco installed several groundwater monitoring wells. Elevated volatile organic compounds (VOCs) were detected in groundwater. A groundwater pump and treat system was installed to remediate and control the contamination. After several years of remediation, VOCs levels in groundwater decreased significantly. As a result of the positive progress and in 2008, PADEP modified the original CO&A that allowed Coinco to shut down the groundwater remediation system and modify the frequency of groundwater sampling. After the shutdown of the remediation system the groundwater plume has remained stable and confined within the property boundaries. Concentrations of VOCs continue to decrease through natural attenuation.

In 2022, Coinco closed their business and listed the property for sale. CEMAD purchased the property on May 18, 2023. CEMAD is currently renovating the buildings. CEMAD has a lease agreement to lease 75% of the buildings to Cutting Edge Manufacturing & Design, LLC, a machining, and manufacturing company. The remaining 25% of the buildings will be leased as a storage facility.

Under the 2023 PADEP CO&A with CEMAD, CEMAD will continue to monitor the groundwater to assess the conditions of the groundwater plume and the efficacy of natural attenuation to reduce VOC levels in groundwater. In addition, CEMAD will continue to conduct an annual survey of downgradient properties within a half mile radius of the site to identify any new groundwater receptors that may potentially impact the onsite groundwater plume.

Long-term Stewardship Site Visit:

On July 28, 2023, EPA conducted a long-term stewardship site visit with PADEP to evaluate the conditions of the Property and to discuss and assess the status of the implemented remedies.

The attendees were:

Name	Organization	Email Address	Phone No.
Khai M. Dao	USEPA	dao.khai@epa.gov	(215) 814-5467
Shawn Peters	PADEP	speters@pa.gov	(814) 332-6844
J. Ronald Johnston	PADEP	jamjohnsto@pa.gov	(814) 332-6676
Melissa Hutchison	PADEP	mehutchiso@pa.gov	(814) 332-6135

Current Site Status:

The property is currently closed. CEMAD is in the process of renovating the buildings. Once completed, Cutting Edge Manufacturing & Design, LLC will occupy 75% of the buildings. The remaining 25% of the buildings will be leased as a storage facility.

Field Inspections:

Because the buildings were under renovation, EPA, and PADEP representatives conducted a field inspection outside of the buildings. The areas of inspection included the site of the former surface impoundments, the former remediation system area, and some of the monitoring wells. The wells appear to be in working condition.

Financial Assurance:

The cost to implement groundwater sampling for the onsite monitoring wells is minimal. EPA determines that financial assurance is not required.

Reporting Requirements/Compliance:

Periodic groundwater monitoring reports are submitted to EPA and PADEP to assess the efficacy of natural attenuation to degrade the constituents of concern and to confirm groundwater plume stabilization.

Mapping:

The property boundary has been geospatially mapped. A downloadable geospatial PDF map is available at the Facility's EPA Factsheet (<https://www.epa.gov/hwcorrectiveactioncleanups/hazardous-waste-cleanup-coinco-incorporated-doing-business-morco>) under the "Reports, Documents and Photographs" section.

Conclusions and Recommendations:

Over the last several years the levels of VOCs in groundwater have steadily decreased through natural attenuation. The 2023 PADEP CO&A with CEMAD, will ensure that the groundwater will continue to be monitored to assess the groundwater conditions and the efficacy of natural attenuation to reduce VOC levels in groundwater. EPA determines that the current groundwater monitoring program is effective in meeting the objectives of protection of human health and the environment.

Files Reviewed:

PADEP Consent Order and Agreement with CEMAD, 2023

Morco Petition for Release, Prepared by Moody and Associates, Inc., October 2021

Coinco Report to Modify Groundwater Monitoring, Prepared by Moody and Associates, Inc., March 2018

PADEP Consent Order and Agreement with Coinco, 2008



Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User

**FIGURE 2
SITE FEATURES MAP**

125 High Street
Cochran, PA 16314

Prepared for:
Morco Corporation

LEGEND

- Wells
- Lines of Cross-Section
- Former Lagoon
- Site Boundary

Map Reference:

Map Exhibit based on Bing MapsHybrid - © 2010
Microsoft Corporation and its data suppliers

NAD 83 State Plane PA North

Scale: 1 in = 100 ft
0 25 50 100
Feet

Project #: 86-3A-747 BW

11548 Cotton Road
Meadville, PA 16335
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Drawn by:	Checked by:	Date:	Revision:
SMR		10/13/2021	0

**Engineering Control/Institutional Control
Corrective Action Remedy Summary**

Facility Name	CEMAD Properties, LLC (CEMAD) Former Coinco Inc. (Coinco)			
Address	125 High Street Cochranton, PA 16314			
EPA ID Number	PAD056882822			
Are there restrictions or controls that address:	Yes	No	Areas	Description of restrictions, controls, and mechanism
Groundwater	x		Entire property	Restrict groundwater use. Property Deed Restriction
Residential Use	x		Entire property	Local Ordinance and PADEP CO&A. Restrict to non- residential use.
Excavation		x		Contaminated soil excavated and disposed offsite.
Vapor Intrusion		x		GW plume located in open space.
Capped Areas		x		
Other Engineering Controls	x			Groundwater monitoring
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		Property Deed restriction & PADEP CO&A.
• Do the ICs provide control for the entire extent of contamination (entire site or a specific portion)?	x		Entire property
• 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	Change in ownership completed in May 2023.
• 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?	x		

• Is there evidence of monitored natural attenuation occurring in groundwater?	x		
• Has (active remediation system) been maintained as necessary?			N/A – No active remediation 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.
• Have notification letters been sent to the local POTW, County Department of Health, and Planning and Zoning Department regarding groundwater use restrictions?	x		

<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

<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)?			N/A
• Is the vapor intrusion mitigation system radius of influence effective for the structure in which its installed?			N/A

<u>Miscellaneous Review and Assessment Questions:</u>	<u>Yes</u>	<u>No</u>	<u>Notes</u>
• Is the security fence intact?			N/A
• Is the appropriate signage posted?			N/A