



REGION 3

PHILADELPHIA, PA 19103

DOCUMENTATION OF LONG TERM STEWARSHIP ASSESSMENT

RCRA Corrective Action

Long Term Stewardship (LTS) RCRIS code (CA88)

Remedy Assessment Summary:

The United States Environmental Protection Agency's (USEPA) Land, Chemicals, and Redevelopment Division (LCRD) representative, Susanne Haug and the Pennsylvania Department of Environmental Protection representative, Steven Hensel, conducted a long-term stewardship assessment of the Former Cyclops Corporation (Facility) in Pittsburgh, PA. PADEP conducted the field inspection on May 22, 2024, and EPA conducted a records review prior to the site inspection.

During the field inspection, Steven Hensel (PADEP) observed the site to be in compliance with the environmental covenant activity and use limitations as it was confirmed that the buildings are on public water supply and there have been no new potable wells installed, the operations on site are non-residential in nature, and the pavement parking area was maintained and in good condition.

The owner submitted the documentation required by the Environmental Covenant to verify they are abiding by the activity and use limitations.

Human exposure to contaminated groundwater is controlled through pathway elimination. The most recent groundwater sampling event was conducted in 2003, and 265 ppb of benzene was detected near the source area (a portion of the source area soils were thermally treated in 1995, however, some contaminated soil could not be treated due to building structural integrity concerns). The only known assumed-downgradient well was last sampled in 1994, and no benzene was detected at that time. The benzene contamination limits are unknown, and it is unknown if it is migrating to Lowries Run or the Ohio River.

Introduction:

Long-term stewardship (LTS) refers to the activities necessary to ensure that engineering controls (ECs) are maintained, institutional controls (ICs) continue to be enforced, and the remedy is protective based on current uses and exposures. The purpose of the EPA Region 3 LTS program is to periodically assess the efficacy of the implemented remedies and to update the community on the status of the RCRA Corrective Action facilities. The assessment is conducted in two-fold, 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 approximately 5 acres and is bordered by a commercial/industrial area to the north and industry to the east and west. Directly south of the Facility are railroad tracks and further south is the Ohio River. Lowries Run Creek follows the Facility's property boundary to the north and east and then discharges into the Ohio River.

Based on the *Phase I Site Assessment and Additional Site Testing* (CEC, December 14, 1994) the property was owned by Clara Hespenheide until 1955 when it was purchased by E. G. Smith Suppliers. E. G. Smith owned the property until 1993 when it was transferred to Smith Steelite. Cyclops Corporation is listed as a successor to E. G. Smith and Company following a merger in 1987.

Cyclops Corporation manufactured industrial metal building panels which included painting, roll forming, shearing, brake forming and the miscellaneous fabrication of sheet metal into panels and associated accessory items. The Cyclops facility consisted of a main building, a paint and chemical storage building and a parking area. There were two waste management areas. The still bottoms drum storage area in the paint storage building was approximately 5 feet by 15 feet and had concrete floors without floor drains. The distillation room located at the eastern portion of the main building was approximately 10 feet by 15 feet and consisted of still system utilizing five drums, and concrete floors.

The Pittsburgh Industrial Plating (PIP) operated the Facility from 1995 to 2002. The Facility remained vacant until 2006, when Sampson Morris purchased and redeveloped the property.

Current Site Status:

Currently, the Facility use is light industrial.

Long-term Stewardship Site Visit:

On May 22, 2024, PADEP conducted a long-term stewardship site visit with Sampson Morris Group to discuss and assess the status of the implemented remedies at the Facility.

The attendees were:

Name	Organization	Email Address
Steven Hensel	PADEP	shensel@pa.gov
Mike Murphy	Sampson Morris Group	mmurphy@sampsonmorrisgroup.com
Josh Darby	Sampson Morris Group	jdarby@sampsonmorrisgroup.com

Implementation Mechanism(s):

The Implementation Mechanism is the method for implementing Institutional Controls (ICs) and Engineering Controls (ECs) and other continuing obligations required as a condition of the Statement of Basis and Final Decision. At this Facility, ICs for groundwater and land use are implemented through an Environmental Covenant, and an IC for soil management and ECs are described in the Final Decision. A summary is provided below and in Attachment 2.

Institutional Controls Summary:

Groundwater Use Restriction: The groundwater at and under the Property shall not be used for potable or agricultural purposes.

Residential Land Use Restriction: The use of the Property shall be limited to commercial, industrial, or nonresidential use, and shall exclude churches, schools, nursing homes, day-care facilities, and/or other commercial-residential-style facilities.

Soil Management Plan / Earth-Moving Restriction: Any excavation or other construction activity within the footprint of contaminated areas at the Facility shall employ measures to protect workers from unacceptable exposure to contaminants.

Engineering Controls Summary:

No engineering controls are explicitly required by the Final Decision or Environmental Covenant. However, the Statement of Basis states, “The proposed remedy protects human health and the environment by eliminating exposure pathways. Soil exposure is generally limited by the physical barriers of overlaying clean soil, concrete foundations and asphalt paving. Exposure to contaminated soil below grade would be prevented by the terms of the proposed use and implementing protection measures for workers during soil excavation activities.”

Financial Assurance:

No Financial Assurance is required by the Final Decision. This is still appropriate.

Reporting Requirements/Compliance:

The Environmental Covenant requires that by the end of every third January following EPA’s approval of the Environmental Covenant, the then current owner of the property submit to EPA and the Department, written documentation stating whether the activity and use limitations are being abided by.

EPA approved the Environmental Covenant on March 28, 2019. Documentation was sent to both EPA and PADEP on January 18, 2022 confirming the activity and use limitations were abided by during the noted period. The next report is due by the end of January 2025.

Mapping:

The Facility has been geospatially mapped and is available on the Facility’s EPA Factsheet (see Attachment 1).

Conclusions and Recommendations:

Conclusions and recommendations from the records review and site inspection are below. The checklist is provided in Attachment 3. Photos from the site inspection are in Attachment 4.

Conclusions:

1. The groundwater use restriction has been abided by. The site utilizes public water supply.
2. The non-residential use restriction has been abided by. The site only has commercial businesses.

3. The soil management restriction has been abided by. They have not conducted any activities requiring a soil management plan since the EC was recorded.
4. The owner submitted the required documentation verifying they are abiding by the activity and use limitations in the Environmental Covenant.

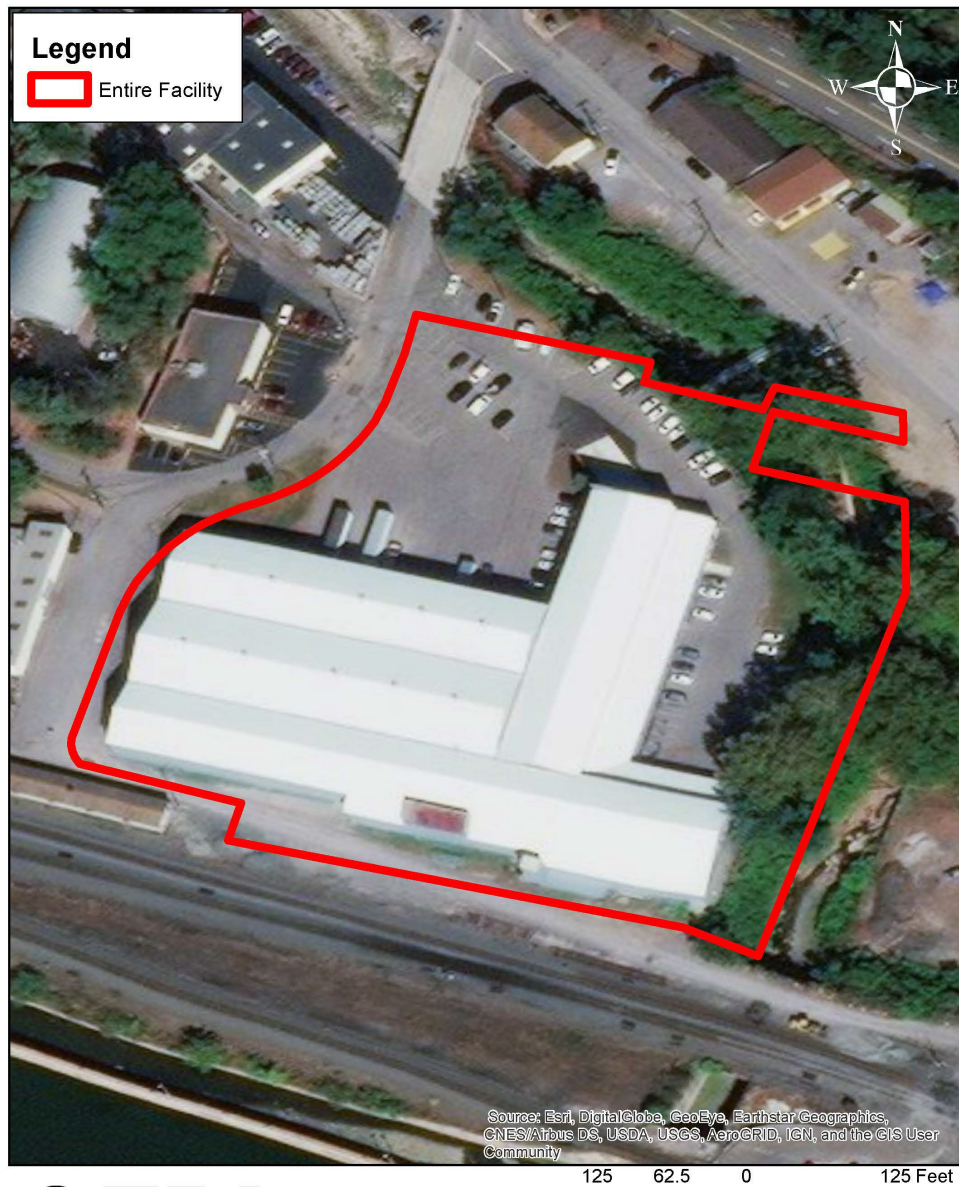
Recommendations:

1. None. The site is in compliance.

Files Reviewed:

- Environmental Covenant for 1 Herron Avenue, Pittsburgh, Pennsylvania 15202, County Parcel Identification No. 213-G-70 and 213-G-71 (signed 3/28/2019, recorded 4/23/2019)
- *Final Decision and Response to Comments, Sampson Morris Group (Former Cyclops and Former Pittsburgh Industrial Plating)* (EPA, October 2017)
- *Statement of Basis, Sampson Morris Group (Former Cyclops and Former Pittsburgh Industrial Plating)* (EPA, August 2017)
- *Letter Report – Focused Phase II Assessment, Former Pittsburgh Industrial Plating Facility, Emsworth, Pennsylvania* (CEC, August 26, 2003)
- *Phase I Site Assessment and Additional Site Testing, Smith Steelite, Emsworth, Pennsylvania* (CEC, December 14, 1994)

Attachment 1. Facility Map.



Cyclops Corporation
(Former Pittsburgh Industrial Plating)
1 Herrn Ave, Pittsburgh, PA
EPA ID PAD087569620

Attachment 2: Remedial EC/IC Summary Table.

Facility Name	Sampson Morris (Former Cyclops Corporation, Former Pittsburgh Industrial Plating)			
Address	1 Herron Ave. Pittsburgh PA 15202			
EPA ID#	PAD087569620			
Are there restrictions or controls that address:	Yes	No	Area(s)	Description of restrictions, controls, and mechanisms
Groundwater Use	x			No potable or agricultural use (Environmental Covenant and Final Decision)
Residential Use	x			Commercial, industrial, or nonresidential use only (Environmental Covenant and Final Decision)
Excavation	x			Worker protection measures required for excavation or construction within contaminated areas (Final Decision)
Vapor Intrusion		x		
Capped Area(s)	x			No explicit requirements, but Final Decision states that soil exposure is generally limited by the physical barriers of overlaying clean soil, concrete foundations and asphalt paving.
Other Engineering Controls		x		
Other Restrictions	x			Final Decision requires worker protection measures for any excavation or other construction activity within the footprint of contaminated areas at the Facility.

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		Environmental Covenant recorded in 2019
• 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?			Unknown. Groundwater not monitored.
• Groundwater contaminants stable or decreasing in concentration?			Unknown. Groundwater not monitored.
• Are groundwater monitoring wells still in place (# wells)?			None were found during the site inspection.

• Any evidence or reason to re-evaluate the number and location of monitoring points and/or monitoring frequency?		x	Groundwater monitoring not required by Final Decision.
• For wells where groundwater monitoring is no longer required, have the wells be decommissioned?			Unknown. No well abandonment notices were found. Current owner assumed decommissioning was completed by a previous owner.
• Is there evidence of monitored natural attenuation occurring in groundwater?			Unknown. Final Decision does not require groundwater monitoring.
• Has (active remediation system) been maintained as necessary?			No active remediation system is required by the Final Decision.
• Is the (groundwater containment system) effectively containing COCs and protecting potential receptors (surface water body and/or groundwater resource) via hydraulic control?			No groundwater containment system is required by the Final Decision. In 2003, 265 ppb of benzene was detected in well CEC-1. The only known downgradient well (MW-3) was sampled in 1994, and no benzene was detected at that time. The benzene contamination limits are unknown, and it is unknown if it is migrating to Lowries Run or the Ohio River.
• Have notification letters been sent to the local POTW, County Department of Health, and Planning and Zoning Department regarding groundwater use restrictions?			Unknown. Notifications are not required by the Environmental Covenant.

<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 or purposes not covered by the IC?		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?			Not applicable
• Have any repairs been necessary? (i.e. regrading, filling, root removal)			Not applicable
• Is the leachate collection system operating and effectively preventing groundwater contamination?			Not applicable

<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)?			Not applicable
• Is the vapor intrusion mitigation system radius of influence effective for the structure in which its installed?			Not applicable

<u>Miscellaneous Review and Assessment Questions:</u>	<u>Yes</u>	<u>No</u>	<u>Notes</u>
• Is the security fence intact?			Not applicable
• Is the appropriate signage posted?			Not applicable
• Has the Facility factsheet on EPA's website been revised with information from this LTS?	x		
• Have the Human Health and Groundwater EI's been reviewed and updated? If no changes needed, new EI forms should indicate the review date and no change in conditions. If updates are needed, new EI's should be drafted, signed by the Section Manager, entered into RCRA Info, and posted on EPA's website.	x		No change to the EI's.

Attachment 4. Site photos



