



REGION 3

PHILADELPHIA, PA 19103

DOCUMENTATION OF LONG-TERM STEWARDSHIP ASSESSMENT

RCRA Corrective Action

Long-term Stewardship (LTS) RCRIS code: CA88P1

Completed by: Khai Dao

Date: 10/1/24

Sechan Limestone Industries (Sechan)

EPA ID: PAD002860377

2925 New Castle Rd.

Portersville, PA 16051

Long-term Stewardship Assessment Summary:

On May 22, 2024, the United States Environmental Protection Agency's (EPA) Land, Chemicals, and Redevelopment Division (LCRD) representative, Khai Dao, conducted a long-term stewardship (LTS) assessment site visit of the Sechan Limestone Industries (Facility) in Portersville, PA.

EPA has determined that Sechan is in compliance with EPA's Final Decision and Response to Comments (FDRTC) and the environmental covenant. EPA concludes that the implemented engineering and institutional controls are effective in meeting the objectives of protection of human health and the environment. Sechan will continue to inspect and maintain the landfill caps to ensure the integrity of the remedy.

Introduction:

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 Sechan Limestone Industries (Sechan) site is located south of the intersection of US Route 422 and US Route 19 in Portersville, PA. The Sechan site is located in a predominantly rural area of western Pennsylvania and occupies approximately 685 acres (Figure 1). Since the closure of the limestone quarry operations, portions of the property outside of the quarry operations have been converted to a mobile home park called Lake Arthur Estates.

The Facility operated primarily as a limestone quarry from the 1940s through the mid-1970s. Several quarried areas were used for landfilling from 1972 through 1985. The converted landfills

were lined with clay soil from the site prior to receiving wastes. The landfill areas and associated impoundments and sedimentation ponds operated under the Pennsylvania Department of Environmental Protection (PADEP) solid waste permits. Landfill areas A, A', C-3, F, and G received only non-hazardous, lime-neutralized pickle liquor waste. Landfill area C received both hazardous and non-hazardous waste. Areas C-1 and C-2 operated under RCRA Interim Status authority from July 1982 until April 1985. The locations of the landfills and associated operations units are presented in Figure 2.

All landfill areas and associated operations units were closed under the supervision of the PADEP. The primary human health and environmental threats posed by the landfills are related to direct contact with the waste remaining in place and any hazardous constituents leaching to the groundwater. Closure activities consisted of capping the landfill units, temporary groundwater remediation related to landfill Area C-1 until groundwater quality beneath Area C-1 improved, and groundwater monitoring.

In 1996, PADEP issued a Consent Order and Agreement (COA) that specified the post-closure care requirements that included long-term groundwater monitoring and periodic inspection and maintenance of the landfill caps.

In 2016, EPA issued FDRTC that requires Sechan to comply with the post-care requirements specified in the 1996 COA with the PADEP. In addition, Sechan will execute of an environmental covenant that limits use and activities on the property to ensure the integrity of the remedy to be protective of human health and the environment.

After several decades of groundwater monitoring, the levels of the contaminants of concern consistently met the EPA drinking water standards. In 2019, PADEP determined that Sechan met the post-closure groundwater monitoring requirements and terminated the groundwater monitoring program. The monitoring wells were decommissioned. Subsequently, Sechan executed an environmental covenant that limits land that is associated with the landfills to non-residential purposes only, restricts groundwater use on the property and limits activities that may compromise the integrity of the landfill caps. Sechan will continue to inspect and maintain the landfills as specified in the 1996 COA and comply with the activity and use limitations pursuant to the environmental covenant.

Current Site Status:

Sechan will continue to inspect and maintain the landfills pursuant to the 1996 COA to ensure the integrity of the cap to be protective of human health and the environment. In addition, Sechan will comply with the environmental covenant that limit land and restrict groundwater use on the property and limit activities that may comprise the integrity of the landfill caps.

Long-term Stewardship Site Visit:

On May 22, 2024, EPA conducted a long-term stewardship site visit with PADEP and Mr. Robert Sechan to evaluate the site and assess the conditions of the closed landfills.

The attendees were:

Name	Organization	Email Address	Phone No.
Khai M. Dao	USEPA	dao.khai@epa.gov	(215) 814-5467
Robert Sechan	Sechan Limestone	beausechan@gmail.com	(412) 956-2328
Shawn Peters	PADEP	speters@pa.gov	(814) 332-6844
Ron Johnston	PADEP	jamjohnsto@pa.gov	(814) 332-6676
Clement DeLattre	PADEP	cdelattre@pa.gov	(814) 332-6840

EPA and PADEP representatives along with Mr. Sechan conducted a field inspection of the former landfills. The landfill caps were intact and heavily vegetated. There are no signs of erosion. The former monitoring wells were inspected and appeared to be properly decommissioned. EPA and PADEP concluded that the integrity of the landfill caps is intact and continues to be protective of human health and the environment.

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 Final Decision. At this Facility, ICs for groundwater and land use are implemented through an Environmental Covenant. ECs and the corresponding post-care requirements are pursuant to the PADEP 1996 COA. The following ICs and ECs apply to the Sechan facility:

Institutional Controls:

Groundwater Use Restriction: The groundwater at the restricted areas of the former landfills shall not be used for any purpose. No new wells shall be installed on the restricted areas unless it is demonstrated to PADEP that such wells are necessary to perform post closure activities.

Land Use Restriction: The restricted areas of the former landfills shall not be used for residential purposes. All earth moving activities on the restricted areas, including excavation, drilling, and construction activities, shall be conducted in a manner such that the activity will not pose a threat to human health and the environment or adversely affect or interfere with the post-closure requirements of the 1996 COA. No such activities shall take place at the Facility unless PADEP provides prior written approval.

Engineering Controls:

Landfill Closures: Routine inspection and maintenance of the landfill vegetative caps to ensure the integrity of the landfill closures.

A summary of the implemented ICs and ECs is described in Table 1 below.

Financial Assurance:

The cost to implement periodic inspection and maintenance of the landfill is minimal. The FDRTC determined that financial assurance is not required.

Reporting Requirements/Compliance:

Every two years by the end of January Sechan submits compliance documentation to EPA and PADEP to state whether the activity and use limitations pursuant to the environmental covenant are being abided by. After the LTS site visit, Sechan submitted their compliance reporting for 2024 as specified in the environmental covenant.

Mapping:

The property boundary has been geospatially mapped. A downloadable geospatial PDF map is available at https://www.epa.gov/sites/default/files/2019-11/documents/geospatialpdf_sechanlimestone.pdf

Conclusions and Recommendations:

EPA has determined that Sechan is in compliance with EPA's FDRTC and the environmental covenant. EPA concludes that the implemented engineering and institutional controls are effective in meeting the objectives of protection of human health and the environment. Sechan will continue to inspect and maintain the landfill caps to ensure the integrity of the remedy.

Files Reviewed:

Sechan Environmental Covenants, November 2019

PADEP Groundwater Monitoring Determination Letter, October 2019

EPA Final Decision and Response to Comments issued to Sechan, September 2016

EPA Statement of Basis for Sechan, August 2016

EPA Environmental Indicator Determinations for Sechan, June 2001.

PADEP Consent Order and Agreement issued to Sechan, October 1996.

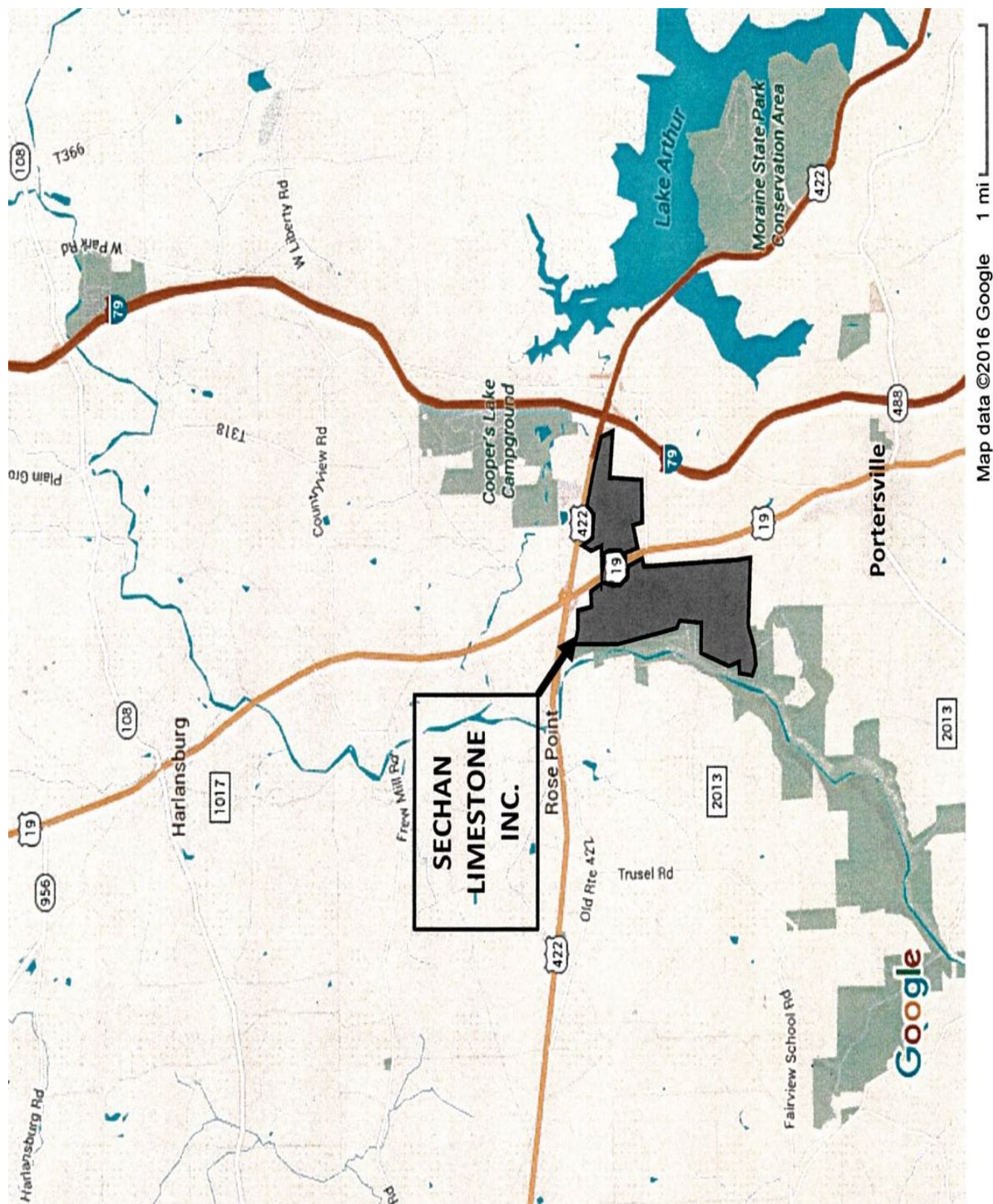
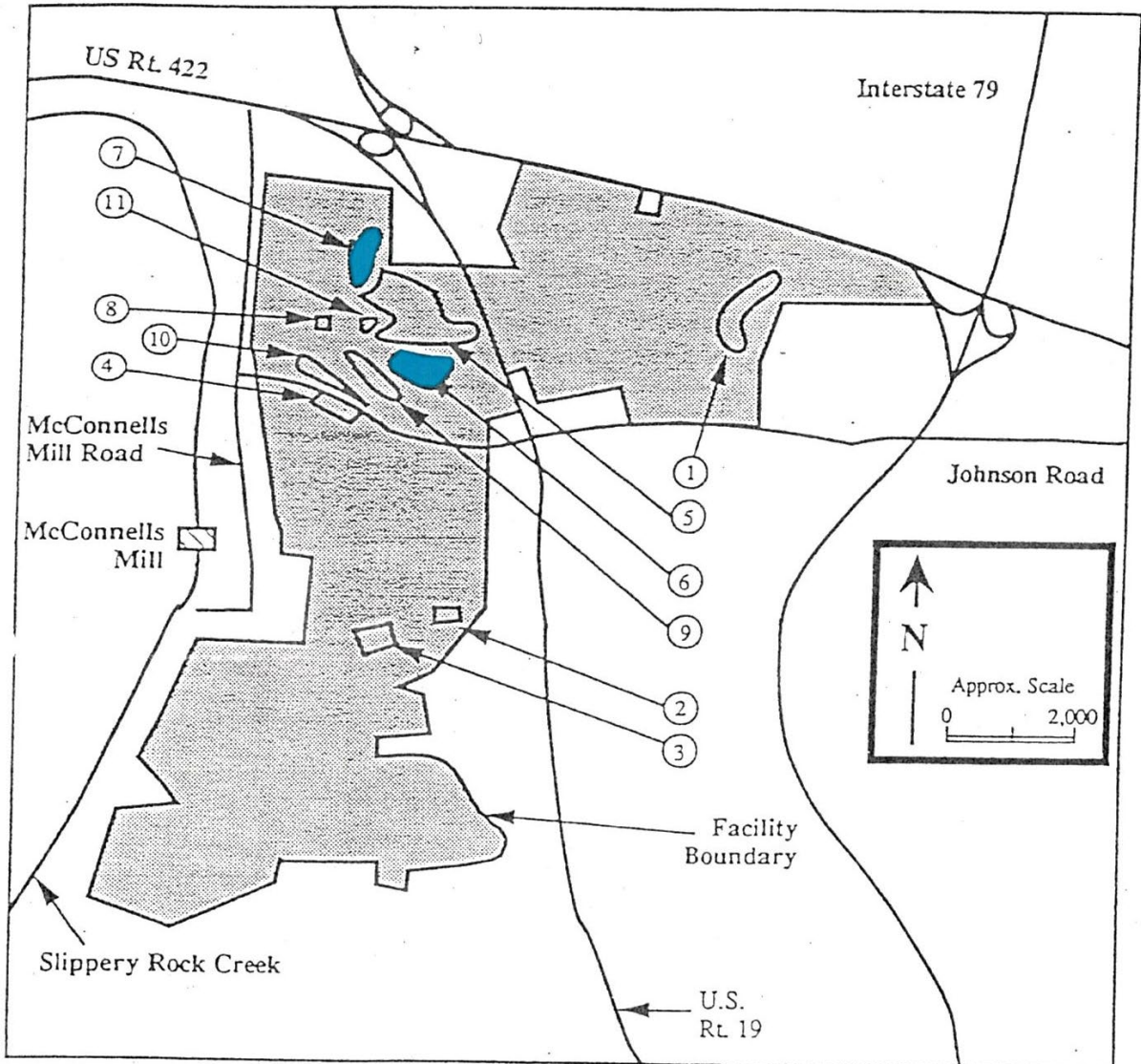



Figure 1 Site Location Map

Sechan Limestone Industries, Inc.



Legend	
1. G Area	7. C-2 Pit
2. A Area	8. Truck Wash
3. A' Area	9. Truck Wash Pond
4. F Area	10. C-Area Settling Ponds
5. Pre-RCRA C-3 Area	11. Leachate Holding Tanks
6. C-1 Pit	
Shaded Area = Facility Property	

 Hazardous Waste Disposal Areas

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Figure 2 Waste Management Areas

Table 1
Corrective Action Remedy Summary
Areas of Implemented Engineering and Institutional Controls

Facility Name	Sechan Limestone Industries			
Address	2925 New Castle Rd., Portersville, PA 16051			
EPA ID Number	PAD002860377			
Are there restrictions or controls that address:	Yes	No	Areas	Description of restrictions, controls, and mechanism
Groundwater	x		Restricted Areas of the former landfills	Prohibits GW use via environ. covenant
Residential Use	x		Restricted Areas of the former landfills	Restrict to non-residential use via environ. covenant
Excavation	x		Defined areas of the former landfills	Limits soil disturbance via environ. covenant
Vapor Intrusion		x	.	
Capped Areas	x		Defined areas of the former landfills	Periodic inspection and maintenance of the landfills via 1996 COA & covenant.
Other Engineering Controls	x		Landfill Caps	Periodic inspection and maintenance of the landfills via 1996 COA & covenant.
Other Restrictions		x		

Remedial Review Questionnaire

<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		Based on past groundwater monitoring data.
• Groundwater contaminants stable or decreasing in concentration?	x		Groundwater met MCLs.
• 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 required.
• 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		Portions of property outside of the quarry operations have been converted to a mobile home park.
• 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		Vegetative landfill caps are periodically inspected and maintained.
• Have any repairs been necessary? (i.e., regrading, filling, root removal)		x	
• Is the leachate collection system operating and effectively preventing groundwater contamination?		x	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. Currently no vapor intrusion issues.

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

Appendix A

Photos



Closure of One of the Former Landfills



Decommissioned Well