

DOCUMENTATION OF LONG TERM STEWARDSHIP ASSESSMENT
RCRA Corrective Action
Long Term Stewardship (LTS) RCRIS code: CA88N (evaluation 1)

Facility: Titan Energy Park, Former Cerro Metal Products and Bolton Metal Products

Address: 2022 Axemann Road, Bellefonte, PA

EPA ID: PAD086733540

Completed by: Jeff Christopher, P.G.

Site Visit: June 12, 2024

Report Date: September 30, 2024

Long Term Stewardship Assessment Summary:

The United States Environmental Protection Agency's (USEPA) Land, Chemicals, and Redevelopment Division (LCRD) representative, Jeff Christopher, and the Pennsylvania Department of Environmental Protection (PADEP) representative, Cheryl Sinclair, conducted a long-term stewardship assessment site visit of the Titan Energy Park, Formerly Bolton Metal Products and Cerro Metal Products Company, (Facility, Property, Site) in Bellefonte, PA. Both USEPA and PADEP conducted the field inspection on June 12, 2024, and reviewed environmental records associated with the Facility. A representative of the Facility did not accompany the USEPA and PADEP on the LTS site visit.

During the site visit USEPA and PADEP observed the Facility to be in general compliance with both the Environmental Covenant(s)¹ placed on the property and the USEPA Statement of Basis and Final Decision and Response to Comments (FDRTC). The activity and use limitations (AULs, also known as engineering and institutional controls) stipulated in the Environmental Covenant has required portions of the Facility: 1) be maintained as impervious caps (concrete or asphalt); 2) restrict groundwater for potable and agricultural use; and 3) preparation of a soil handling plan that includes regulatory notifications if soil within a restricted area is disturbed. In addition, the USEPA FDRTC indicates future use of the Property should be limited to non-residential use.

The Facility is not fulfilling their post-remediation reporting requirements stipulated in the Environmental Covenants. As outlined in decision documents the Facility is required to provide written documentation indicating the AULs are being abided by every third January (once every three years). Neither the PADEP nor USEPA has received this documentation.

This LTS assessment concludes a need for minor maintenance is necessary to ensure post-remedial care reporting is conducted as stipulated in the Environmental Covenant.

Introduction:

¹ There are three (3) Environmental Covenants associated with the property (North Plant, Plant 1, and Plant 4) that correlate to a phased remedial approach of the facility.

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 located at 2022 Axemann Road, Bellefonte, PA, and consists of approximately 150 acres. The Facility began operation in 1915 as a foundry that conducted forging, machining, melting, casting, pickling, drawing and finishing of metals, specifically copper and brass. Industrial and manufacturing activities occurred on 19 acres in a central portion of the property boarding Logan Branch, a tributary to Spring Creek, and Axemann Road. After changing ownership on several occasions, operations ceased in 2008. The Marmom Group, Inc. has reportedly retained environmental cleanup liability associated with the Property.

Environmental characterization and remediation activities of the Facility were initiated in the 1980s. Site characterization activities identified several releases that were attributed to operation of vapor degreasers, oil leakage from hydraulic pistons and melting furnaces, slag and ash buried beneath a significant portion of these areas, and other manufacturing operations. In conjunction with entering the Property into Pennsylvania's Act 2 program in 2009, the Facility was divided into six areas that included the North Yard; Plant 1; South Spring; Plant 4; South Yard; and Eastern Hillside. Characterization and remediation of each of the areas was phased to meet project objectives.

Remedial activities have included:

- Site decommissioning, which included the removal of multiple aboveground storage tanks and the clean out of sediment traps, vats, and casting pits.
- Removing impacted sediment from Logan Branch.
- Plant 1: Operation of a groundwater pump and treat system from 1992 through 2008; excavation of 238.5 cubic yards of contaminated soil; application of sodium persulfate in the bottom of the excavation; and maintaining an impermeable cap in a central portion of the area.
- Plant 4: Dense-non aqueous phase liquid (DNAPL; PCB, Arochlor 1248) recovery beneath the building and maintaining the building floor slab as a cap.
- North Plant: Operation of a groundwater pump and treat system from 2011 through 2013 and maintaining an impermeable cap on the eastern portion of the cap.

Contaminants in soil and/or groundwater that remained above the standards in affect at that time included chlorinated solvents (North Plant and Plant 1), elevated metals (various areas), and PCBs (Plant 4) and were remediated using Pennsylvania's Act 2 Site-Specific Standard and pathway elimination. To fulfill those requirements a combination of human health risk assessments, engineering controls, and institutional controls where used to mitigate the pathway. The analysis was based on continued non-residential use of the Property. Based on the timing and completion of remedial activities, Environmental Covenants were prepared to provide mechanisms for implementation of institutional and engineering controls. Environmental Covenants currently exist

for Plant 1, Plant 4, and the North Plant as described below. Following the completion of remedial activities the USEPA issued the FDRTC in 2018.

Current Site Status:

The facility is currently used for non-residential purposes. Portions of the buildings are occupied by various tenants whose operations include warehousing, storage, metal fabrication, retail, commercial, and restaurants.

Long-term Stewardship Site Visit:

On June 12, 2024, the EPA and PADEP conducted a long-term stewardship site visit of the Titan Facility. A Facility representative was not present for the inspection. The inspectors were able to access all necessary areas to assess the status of the implemented remedies at the Facility.

The attendees were:

Name	Organization	Email Address
Jeff Christopher	US EPA Region 3	Christopher.Jeff@epa.gov
Cheryl Sinclair	PADEP – Northcentral Regional Office	CSinclair@pa.gov

Implementation Mechanism(s):

The Implementation Mechanism is the method for implementing ICs and ECs and other continuing obligations required as a condition of the Statement of Basis and Final Decision. At this Facility, ECs and ICs are implemented through a combination of the Environmental Covenant and USEPA FDRTC. A summary is provided below and in Attachment 2.

Institutional Controls (ICs) Status:

Groundwater Use Restriction: Portions of Plant 1, Plant 4, and North Plant: Groundwater may not be used as a potable water supply nor for agricultural purposes unless tested and treated according for its intended purposes, as approved in writing by the PADEP.

- The LTS inspection did not identify groundwater use on any portion of the Facility. The buildings are connected to the public water supply system.

Soil Management Plan / Earth-Moving Restriction: Portions of Plant 1, Plant 4, and North Plant: A soil handling plan that includes notification to the PADEP shall be developed if soil within the restricted area will be disturbed, and the handling of all soils must comply with the Management of Fill Policy, Doc No. 258-2182-773.

- The LTS inspection did not indicate earth-moving activities have occurred at the Facility.

Residential Land Use Restriction: The use of the Property shall be limited to nonresidential use.

- The LTS inspection indicated the Property is being used for nonresidential purposes.

Engineering Controls (ECs) Status:

Asphalt Cap:

Portions of Plant 1 and North Plant:

The ground surface must remain sealed with an impermeable material such as concrete or asphalt.

- The LTS inspection indicated that portions of the Facility that were required to be capped were paved with asphalt. However, cracking in the asphalt was observed in the Plant 1 area. This should be closely monitored and repaired as needed.

Financial Assurance:

No Financial Assurance is required by the Final Decision.

Reporting Requirements/Compliance:

The Environmental Covenant(s) requires that by the end of every third January the Facility shall provide written documentation indicating the AULs are being abided by. Neither the USEPA nor PADEP have received this documentation.

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 institutional and engineering controls as outlined in the Environmental Covenants and USEPA FDRTC remain protective of current occupants on the Property.
2. The owner has not submitted the required documentation verifying they are abiding by the activity and use limitations as required in the Environmental Covenant and USEPA FDRTC.

Recommendations:

1. The LTS assessment indicates the Titan Facility is in need of minor maintenance. The maintenance is necessary to ensure the appropriate post-remediation care documentation is submitted to the regulatory agencies.
2. This evaluation was conducted considering the current site use. If future conditions include a change in site use and/or new buildings are constructed, additional evaluations (e.g. vapor intrusion) may be necessary.
3. The existing Environmental Covenants do not specify non-residential use for the entire property as indicated in the USEPA FDRTC. A property wide Environmental Covenant should be considered for this institutional control.

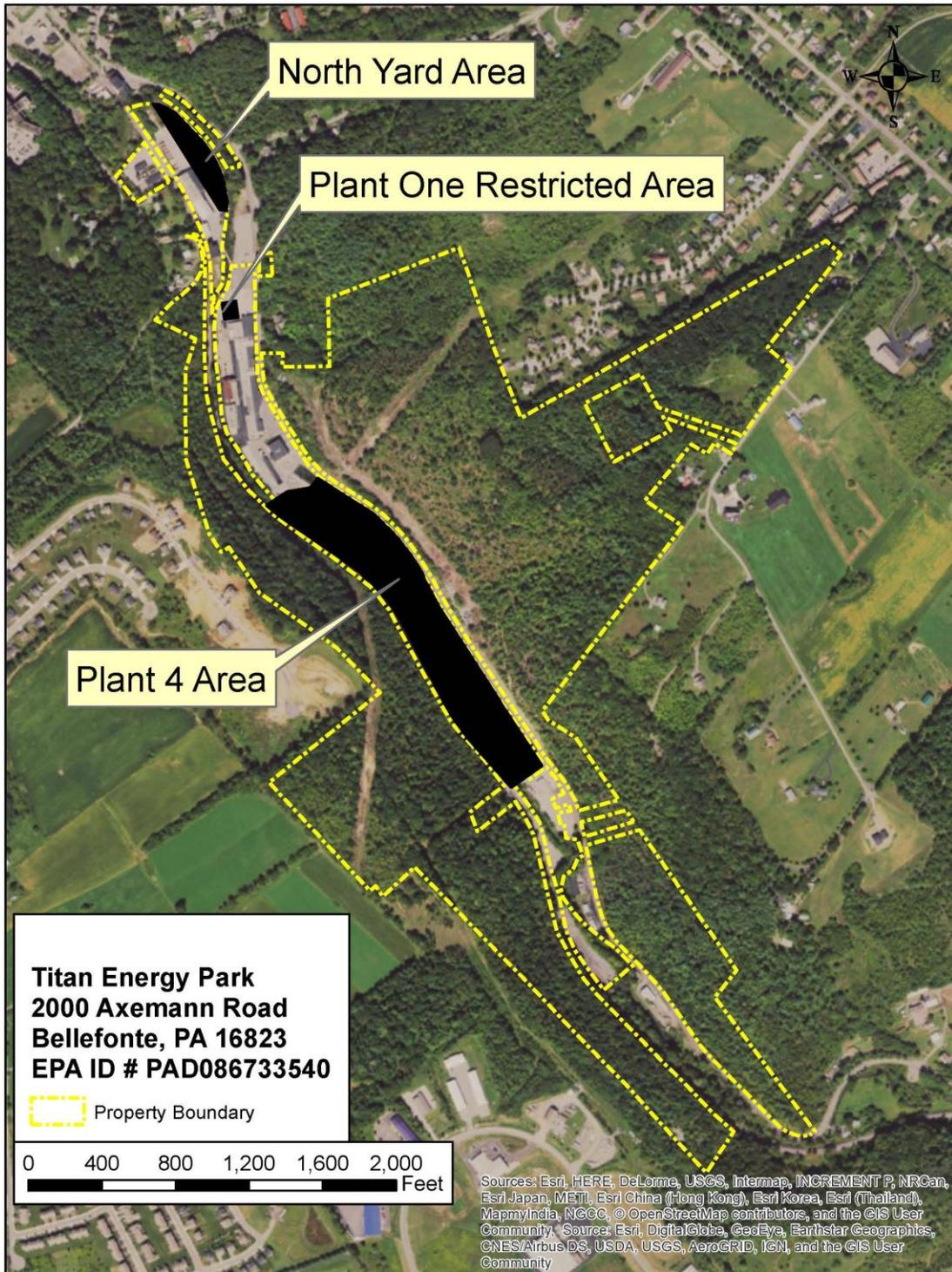
Files Reviewed:

List the files/records reviewed during this LTS assessment.

- Corrective Action Final Decision and Response to Comments for Titan Energy Park (Formerly: Cerro Metals, Bolton Metal Products) in Bellefonte, Pennsylvania

- Corrective Action Statement of Basis for Titan Energy Park (Formerly: Cerro Metals, Bolton Metal Products) in Bellefonte, Pennsylvania
- Environmental Indicator Human Exposure for Titan Energy Park (Formerly: Bolton Metal Products, Cerro Metal Plate) in Bellefonte, Pennsylvania
- Environmental Indicator Groundwater for Titan Energy Park (Formerly: Bolton Metal Products) in Bellefonte, Pennsylvania
- Corrective Action Environmental Covenant for Titan Energy Park -North Yard Parcel (Formerly: Cerro Metal Products, Bolton Metal Products) in Bellefonte, Pennsylvania
- Corrective Action Environmental Covenant for Titan Energy Park - Plant 1 (Formerly: Cerro Metal Products, Bolton Metal Products) in Bellefonte, Pennsylvania
- Corrective Action Environmental Covenant for Titan Energy Park Plant 4 (Formerly: Cerro Metal Products, Bolton Metal Products) in Bellefonte, Pennsylvania
- *Final Report for North Yard Area Formerly: Cerro Metal Products Bellefonte Facility, Spring Township, Centre County, Pennsylvania, PADEP Facility ID#14-17981, Permitted Facility ID#722112 and Remedial ID#39034*, prepared by P. Joseph Lehman, Inc., Consulting Engineers, dated March 13, 2015.
- *Final Report for Plant 4 Area Former Cerro Metal Products Bellefonte Facility, Spring Township, Centre County, Pennsylvania, PADEP Facility ID#14-17981*, prepared by Letterle & Associates, LLC, dated March 2012.
- *Final Report – Eastern Hillside, South Spring, & South Yard Former Cerro Metal Products Bellefonte Facility, Spring Township, Centre County, Pennsylvania, PADEP Facility ID#14-17981, PF ID#722112 and Remedial ID#39034*, prepared by Chambers Environmental Group, Inc., dated June 2011
- Letter to Ms. Cheryl Sincliar, PADEP Re: *Well Abandonment Report, Former Cerro Metal Products Bellefonte Facility, Spring Township, Centre County, Pennsylvania*, dated June 8, 2012.

Attachment 1. Geospatial or Aerial map of Facility.



Attachment 2: Remedial EC/IC Summary Table.

Facility Name	Titan Energy Park (Formerly: Bolton Metal Products)			
Address	2022 Axemann Rd. Bellefonte, PA 16823			
EPA ID#	PAD086733540			
Are there restrictions or controls that address:	Yes	No	Area(s)	Description of restrictions, controls, and mechanisms
Groundwater Use	X			Applies to portions of Plant 1, Plant 4, and North Plant: No potable or agricultural use as detailed in the Environmental Covenants and Final Decision.
Residential Use	X			Nonresidential use only as detailed in the USEPA FDRTC
Excavation	X			Applies to portions of Plant 1, Plant 4, and North Plant: A soil handling plan that includes notification to the PADEP shall be developed if soil within the restricted area will be disturbed and the handling of all soils must comply with the Management of Fill Policy, Doc No 258-2182-773 as detailed in the Environmental Covenants and USEPA FDRTC
Vapor Intrusion		X		Prior vapor intrusion evaluation covers existing buildings and did not identify an unacceptable risk.
Capped Area(s)	X			Applies to portions of Plant 1 and North Plant: The ground surface must remain sealed with an impermeable material such as concrete or asphalt. Requirement detailed in the Environmental Covenants and USEPA FDRTC
Other Engineering Controls		X		
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		Yes, with the exception of nonresidential use which is specified in the USEPA FDRTC.
• Do the ICs provide control for the entire extent of contamination (entire site or a specific portion)?	X		Yes, the extent of contamination was delineated to the nonresidential PADEP Act 2 MSCs which applies to the current use of the 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	No, prior determinations did not consider changes to site use or construction of new buildings.
• Have the risk of potential pathway exposures addressed under Corrective Action changed based on updated screening levels and new technologies?		X	Future evaluations of the Titan Facility should consider changes to site use. Evaluation of the PCB release may be necessary in accordance with TSCA regulations.
• Are modifications to the IC implementation mechanism needed? (i.e., UECA Covenant, Permit or Order)			The ICs and ECs specified in the Environmental Covenants are protective of current site occupants. PADEP understands that a change in site use will trigger further evaluations associated with re-entering the Facility into the Act 2 program.
• Are there plans to develop or sell the property?		X	
• Have all reporting requirements been met?		X	The Facility has not provided post remedial care documentation as outlined in the Environmental

			Covenants or USEPA FDRTC.
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<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 is not currently monitored.
• Groundwater contaminants stable or decreasing in concentration?			Unknown, groundwater is not currently monitored.
• Are groundwater monitoring wells still in place (# wells)?		X	All groundwater monitoring wells have been abandoned.
• Any evidence or reason to re-evaluate the number and location of monitoring points and/or monitoring frequency?			Unknown, groundwater is not currently monitored. Monitoring would be required to determine whether Corrective Action Objectives have been obtained.
• For wells where groundwater monitoring is no longer required, have the wells be decommissioned?			All groundwater monitoring wells have been abandoned.
• Is there evidence of monitored natural attenuation occurring in groundwater?			Unknown, groundwater is not currently monitored.
• Has (active remediation system) been maintained as necessary?			Not applicable
• Is the (groundwater containment system) effectively containing COCs and protecting potential receptors (surface water body and/or groundwater resource) via hydraulic control?			Not applicable
• Have notification letters been sent to the local POTW, County Department of Health, and Planning		X	The groundwater use restrictions apply to the Property.

and Zoning Department regarding groundwater use restrictions?			
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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 or purposes not covered by the IC?		X	
• Have there been recent construction or earth-moving activities or plans for such?		X	The site visit indicated construction activities may be planned in the southern portion of the Plant 4 restricted area.

<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)			Unknown
• 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)?		X	
• 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		Pending
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Attachment 4. Site photos (optional).



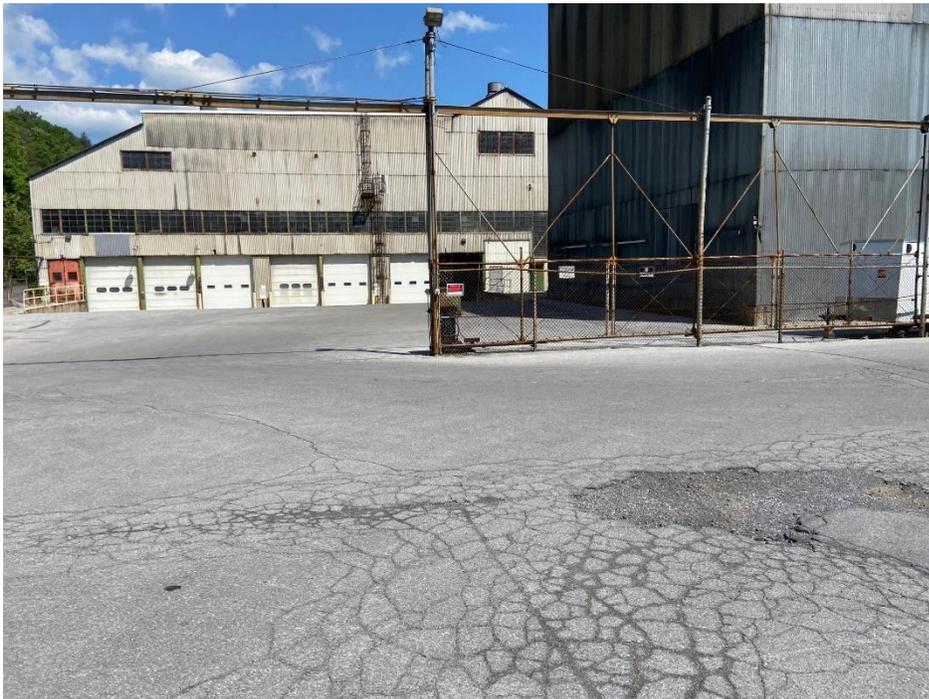
North Plant Capped area. View is looking south.



Plant 1 Capped Area. View is looking south.



Plant 4 Restricted Area, northern portion of building.



Plant 4 exterior of building.



Plant 4 construction activities. Southern portion of the building.



South Spring located in the central portion of property.