

May 21, 2026

Ms. Amanda Michel
RPM/Region III PCB Coordinator
Environmental Protection Agency – Region III
Office Of Pennsylvania Remediation
Land and Chemicals Division
1600 JFK Blvd.
Philadelphia, PA 19103-2029

**RE: Former NVF Company - Kennett Square Facility ("Site")
Revised Final Cleanup Plan for PCBs in Soil and Groundwater**

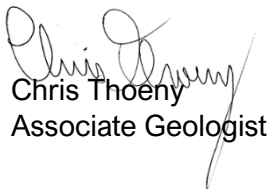
Ms. Michel:

On behalf of Rockhopper, L.P., enclosed please find the subject report documenting the Final Cleanup Plan for the Site. The report describes the completed and proposed remedial actions for soil and groundwater as outlined in the May 8, 2025, Risk-Based Disposal Approval Application (RBDAA) and elsewhere, and is being submitted pursuant to EPA's July 15, 2025, conditional approval of the RBDAA.

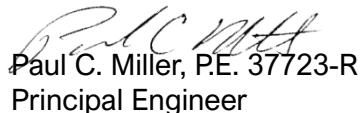
This report is being submitted electronically to EPA and PADEP. However, if you would like hard copies of any portions of the report, please feel free to let us know.

Thank you for your assistance in this matter and we look forward to working with you going forward.

Sincerely
ONTERRIS USA, INC.



Chris Thoeny
Associate Geologist



Paul C. Miller, P.E. 37723-R
Principal Engineer

Attachment

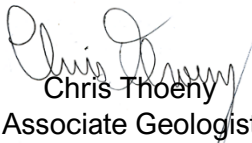
c: Mr. David Brown, PADEP (via electronic copy)
Mr. George Beer, Rockhopper, L.P.
Mr. Tyler O'Neil, Rockhopper, L.P.
Mr. Rich Lake, GTA Engineering

FINAL CLEANUP PLAN FOR PCBS IN SOIL AND GROUNDWATER MEDIA FORMER NVF COMPANY 400 W. MULBERRY STREET KENNETT SQUARE, PENNSYLVANIA

Prepared for: ROCKHOPPER, L.P.
722 YORKLYN ROAD
HOCKESSIN, DE 19707

Prepared by: ONTERRIS USA, INC.

February 17, 2026
(Revised May 21, 2026)


Chris Thoeny
Associate Geologist

Reviewed by:


Paul C. Miller, P.E. 37723-R
Principal Engineer

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Appendix II	RBDA Application
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1 Introduction

Environmental Alliance, Inc., a Montrose Environmental Company (“Alliance”) is submitting this Final Cleanup Plan for PCBs in Soil And Groundwater Media (“Final Cleanup Plan”) to EPA on behalf of Rockhopper, L.P. (“Rockhopper”) for the former NVF Site located at 400 West Mulberry Street within Kennett Square Borough, Chester County, Pennsylvania (the “Site”) as shown on Figure 1. Rockhopper previously submitted a “Remedial Investigation/Cleanup Plan Addendum and Final Report for PCBs in Soil” to EPA on January 11, 2023 (“2023 PCB Report”). This Final Cleanup Plan documents all changes made since the 2023 PCB Report, including comments and responses to the 2023 PCB Report, and all amendments noted and referenced in the Risk Based Disposal Approval Application (“RBDA Application”), approved by EPA on November 19, 2025. This Final Cleanup Plan also contains the EPA-approved June 13, 2025, PCB Groundwater Sampling Workplan, as well as the EPA-approved September 9, 2025, PCB Groundwater Report.

The 2023 PCB report, with the revisions listed in Section 3.0 below, is provided in **Appendix I**. The RBDA Application including Exhibits is provided in **Appendix II**. The comment, response and related documents following the 2023 PCB Report submittal are listed below and provided in full within **Appendix III** or elsewhere as noted:

1. June 11, 2024 – EPA Comment Letter on January 11, 2023, Final Report
2. October 15, 2024 – Rockhopper response to EPA’s June 11, 2024, comment letter
3. February 21, 2025 – EPA response to Rockhopper’s October 14, 2024, letter
4. March 31, 2025 – Rockhopper response to EPA’s February 21, 2025, letter
5. May 7, 2025 – EPA response to Rockhopper’s March 31, 2025, letter
6. May 8, 2025 - RBDA Application (**Appendix II**)
7. June 13, 2025 - PCB Groundwater Sampling Workplan (**Appendix IV**)
8. July 15, 2025 – EPA conditional approval with comments to the May 8, 2025, RBDAA
9. September 9, 2025 - Groundwater Report (submitted September 17, 2025) (**Appendix IV**)
10. November 19, 2025 – EPA RBDA Application and Groundwater Report approval.

2 Final Cleanup Plan

As noted in the EPA-approved RBDA Application, the PCB remediation objectives for the Site are as follows:

1. Remove and dispose of offsite soils/concrete containing total PCBs above 50 parts per million (ppm) where feasible;
2. Remediate residential lots to below 1 ppm total PCBs;
3. Consolidate soils with total PCBs greater than 1 ppm and less than 50 ppm on the southwestern portion of the property under a cap, and restrict the area to low occupancy use;
4. Cap and manage soils with total PCB concentrations exceeding 50 ppm surrounding the right of way areas under an Environmental Covenant when excavation is not feasible due to infrastructure concerns;
5. Cap areas of saturated soils with greater than 50 ppm total PCBs and implement vapor intrusion mitigation actions or investigate inhabitable structures within a 100-foot radius;
6. Record an Environmental Covenant to restrict the land activity and use to be consistent with the remedy and restrict future use of groundwater at the property; and
7. Conduct a groundwater investigation to evaluate the presence of any residual PCB impacts to groundwater at the property.

Applicable figures from the 2023 PCB Report showing the proposed or completed remediation objectives are provided in **Appendix V**. The revised January 2023 PCB Report (**Appendix I**) and related comment letters (**Appendix III**) provide further documentation. Rockhopper has already completed PCB remediation objectives Nos. 1, 2 and 7, and the remaining objectives will be completed in connection with the planned redevelopment of the Site¹.

Remedial objective No. 1 was completed between 2015 and 2022 and included extensive sampling, removal and offsite disposal of soils and concrete identified as containing total PCBs above 50 ppm. A total of 8,135.89 tons of soil and concrete were disposed offsite at a TSCA landfill, in accordance with all applicable laws. Documentation relating to the completion of remediation objective No. 1 can be found in Figure 35 (**Appendix V**) and within Sections 4.1.3, 4.5 and 5.32 of the January 2023 PCB Report (**Appendix I**).

Remedial objective No. 2 was completed between 2015 and 2021 and included extensive sampling and relocation of soil identified as containing total PCBs above 1 ppm from proposed residential areas to The southwest corner of the property, which will be capped through future

¹ An approximately 150 square-foot concrete pad remaining in the Excavation 11 area will be sampled for PCBs and managed as described in Section 3.2 of this report. This future work potentially applies to remediation objective 1 and/or 2.

development. A total of approximately 15,142.81 tons of soil were removed from these areas due to presence of PCBs above 1 ppm and/or other contaminants of concern. Documentation relating to the completion of remediation objective No. 2 can be found in Figure 35 (**Appendix V**) and within Sections 4.1.3, 4.5 and 5.32 of the revised January 2023 PCB Report (**Appendix I**).

Remediation objective No. 3 refers to the southwest corner of the property. A total of approximately 15,142.81 tons of soil were moved to this area between 2015 and 2021. Documentation describing the area and remedy for remediation objective No. 3 can be found in Figure 36 (**Appendix V**) and within Section 5.32 of the revised January 2023 PCB Report (**Appendix I**).

Remediation objective No. 4 refers to the Railroad Right-of-Way and the Northeast Right-of Way area along Mulberry Street. Documentation describing the area and remedy for remediation objective No. 4, Railroad Right-of-Way, can be found in Figure 40 (**Appendix V**) and within Section 5.32 and Section 6.1 of the revised January 2023 PCB Report (**Appendix I**). Documentation describing the area and remedy for remediation objective No. 4, Northeast Right-of-Way, can be found in Figure 42 (**Appendix V**) and within Section 5.32 and Section 6.3 and of the revised 2023 PCB Report (**Appendix I**).

Remediation objective No. 5 refers to the Excavation 39 Area. Documentation describing the area and remedy for remediation objective No. 5 can be found in Figure 41 (**Appendix V**) and within Section 5.32 and Section 6.2 of the revised January 2023 PCB Report (**Appendix I**).

Remediation objective No. 6 refers to all areas of the Site where an Environmental Covenant describing land use restrictions will be required. The Environmental Covenant(s) required for the Site are described in Exhibit B of the RBDA Application (**Appendix II**), within Section 7.0 of the revised 2023 PCB Report (**Appendix I**) and related comment and response documents provided in **Appendix III**.

Documentation relating to the completion of remediation objective No. 7 can be found in **Appendix IV** of this report. Remediation objective No. 7 was completed in 2025 and included installation and sampling of new and existing groundwater monitoring wells for PCBs, as well as evaluation of historical data. All the 2025 groundwater analytical results for PCBs were below maximum contaminant levels (MCLs).

Modifications to the 2023 PCB Report pursuant to the EPA comment and response documents are summarized below.

3 Description of Changes made to the 2023 PCB Report

The comment and response documents provided in **Appendix III** reflect the agreed upon revisions to the 2023 PCB Report. All text or figure edits that were requested or necessary, are summarized below.

3.1 Changes to Section 5.0: Attainment Demonstration for PCBs in Soil

3.1.1 Section 5.14 Excavation 16

As agreed in the February 21, 2025, EPA Comment letter, Figure 20 of the Final PCB Report was updated and noted in the Table of Contents (**Appendix III, October 15, 2024, Response Letter**).

3.1.2 Section 5.19 Excavation 21

As agreed in the February 21, 2025, EPA Comment letter, Figure 23 of the Final PCB Report was updated and noted in the Table of Contents (**Appendix III, October 15, 2024, Response Letter**) and the following text is incorporated into this section:

EX-21 was excavated to 4 feet to remediate PCBs, arsenic, thallium and benzo(a)pyrene. For PCBs, attainment with unrestricted TSCA standards (< 1 PPM) was achieved. For all non-PCB substances, except benzon(a)pyrene, attainment with residential Statewide Health Standards under Pennsylvania's Act 2 Standards was achieved. EX-21 was further excavated to a depth of 5.5 feet to remediate the benzo(a)pyrene to attain Act 2 residential Statewide Health Standards (An Act 2 Final Report is pending).

3.1.3 Section 5.21 Excavation 23

As agreed in the February 21, 2025, EPA Comment letter and October 15, 2024, Response Letter (**Appendix III**), the following text is incorporated into this section:

The excavation and attainment sampling process required multiple phases until the RAO was met. The different excavation area depths in Excavation 23 were driven by post-excavation and delineation boring sample results for PCBs collected over the different excavation phases. In some cases, confirmatory samples below 1 PPM total PCBs were removed during a subsequent excavation phase.

3.1.4 Section 5.25 Excavation Areas 34, 35 and 37

As agreed in the February 21, 2025, EPA Comment letter, Figure 29C of the Final PCB Report was updated and noted in the Table of Contents (**Appendix III, October 15, 2024, Response Letter**).

3.1.5 Section 5.26 Excavation Areas 36 and 38

As agreed in the February 21, 2025, EPA Comment letter, Figure 30B of the Final PCB Report was updated and noted in the Table of Contents (**Appendix III, October 15, 2024, Response Letter**).

3.2 Changes in Section 6.0: Cleanup Plan Addendum for Soils

3.2.1 Section 6.1 Railroad Right-of-Way (EX 1 and EX 3)

Per EPA's February 21, 2025, and May 7, 2025, comment letters (**Appendix III**), the text from the second paragraph of this section: "This right-of-way area may require additional, confirmatory sampling prior to installation of the final cap." Is replaced with:

Since no continuing release to the railroad right-of-way has been identified since Rockhopper's acquisition of the subject property, no further sampling is required prior to implementation of the remedy.

3.2.2 Section 6.4 Concrete

Per EPA's February 21, 2025, and May 7, 2025, comment letters (**Appendix III**), the following text is incorporated into this section:

For Excavation 11, sampling of the concrete pad shown between the 7.2 ft. and 5 ft. excavation areas on Figure 15 of the Final PCB Report will be required, prior to its disposal. In lieu of disposing of the concrete pad off-site, the developer may crush the concrete pad and reuse it on site. Subject to complying with the above sampling requirements, the crushed concrete pad may be used on-site as follows: if below 1 ppm total PCBs, the crushed pad may be used at the former NVF Property in an unrestricted manner; if equal to or less than 10 ppm total PCBs, the crushed pad may be relocated under a cap in a high occupancy area of the former NVF Property; and if greater than 10 ppm total PCBs, but less than 100 ppm total PCBs, the crushed pad may be relocated under a cap in a low occupancy area of the former NVF Property.

4 Preliminary Dust Control Plan

A Dust Control Plan (DCP) will be implemented during the proposed remediation and redevelopment project to minimize fugitive dust emissions and protect nearby receptors. This abbreviated plan is being provided for planning purposes; a comprehensive, formal DCP will be submitted once development plans are finalized. The final DCP will fully comply with the EPA guidance entitled Fugitive Dust Control at TSCA PCB Cleanup Sites and will incorporate all required Dust Control Measures (DCMs), air monitoring protocols, and supervisor responsibilities.

During site activities (e.g., remediation, excavation, soil handling, stockpiling, and vehicle movement) that have the potential to disturb areas where PCBs remain in soil above 1 ppm (most of the surface and subsurface soil remaining already has PCB concentrations below the residential standard of 1 ppm) dust will be controlled using certain of the measures outlined in the EPA guidance. These measures include limiting disturbances to the extent practical, maintaining adequately wet conditions, stabilizing or covering exposed soils and stockpiles, applying dust suppressants, restricting visible dust plumes, controlling track-out, and ceasing operations during high-wind conditions. These DCMs are effective methods for preventing fugitive dust releases and mitigating off-site migration of PCBs during cleanup actions.

Ambient air monitoring will be conducted during potential dust-generating activities using continuous, direct-reading PM_{10} monitors positioned upwind and downwind of work areas. Consistent with EPA's recommended approach, the project will use the default PM_{10} air action level of $25 \mu g/m^3$, calculated as a 120-minute rolling average, to evaluate dust control performance. If PM_{10} concentrations exceed this trigger level, all dust-generating activities will stop, additional DCMs will be implemented, and work will not resume until concentrations fall below the action level for a 30-minute period.