



SEMS DocID

2260234

**EXPLANATION OF SIGNIFICANT DIFFERENCES
for the
SHRIVER'S CORNER SUPERFUND SITE
STRABAN TOWNSHIP, ADAMS COUNTY, PENNSYLVANIA**

I. INTRODUCTION

Site Name: Shriver's Corner Superfund Site
Site Location: Straban Township, Adams County, Pennsylvania
Lead Agency: U.S. Environmental Protection Agency, Region III
Support Agency: Pennsylvania Department of Environmental Protection

Statement of Purpose

The U.S. Environmental Protection Agency (EPA) is issuing this Explanation of Significant Differences (ESD) in accordance with Section 117(c) of the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA), 42 U.S.C. § 9617(c), and Section 300.435(c)(2)(i) of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 C.F.R. § 300.435(c)(2)(i). Section 117(c) of CERCLA and Section 300.435(c)(2)(i) of the NCP require the publication of an ESD when modifications to the selected remedy are necessary, and such modifications significantly change, but do not fundamentally alter, the remedy selected in a Record of Decision (ROD) with respect to scope, performance, or cost.

Since the Selected Remedy as outlined in the September 29, 1995 ROD was chosen, significant changes need to be made to the remedy in order for the remedy to be protective of human health and the environment. Specifically, the institutional controls (ICs) for the groundwater did not fully encompass all areas where groundwater contamination is present or protect the entire community supply well system and groundwater extraction and treatment systems. It is the decision of the EPA to significantly alter the remedy to address these issues. This ESD adds to the existing institutional controls of the Selected Remedy and provides justification for these changes.

The information EPA has relied upon or considered to date in issuing this ESD, has been added to the Administrative Record for the Site in accordance with Section 300.825(a)(2) of the NCP. The Administrative Record is available for public review at the locations listed below:

Adams County Public Library
140 Baltimore Street
Gettysburg, Pennsylvania 17325
(717) 334-5716

U.S. Environmental Protection Agency, Region III
Administrative Record Reading Room
1650 Arch Street
Philadelphia, PA 19103-2029
(215) 814-3157
Hours: Monday – Friday: 8:00 AM to 4:00 PM
Please call to schedule an appointment.

The Administrative Record is also available online at:
<https://semspub.epa.gov/src/collections/03/AR/PAD980830889>

II. SUMMARY OF SITE HISTORY, CONTAMINATION, AND SELECTED REMEDY

A. Site History and Contamination

The Shriver's Corner Superfund Site (the Site), located entirely in Straban Township, Pennsylvania is in a rural area with farmlands and some residential development. The Site includes two areas where industrial wastes were disposed: the Culp Area and the Shealer Area. These two Areas are located on separate properties north and south of Shrivvers Corner Road (Figure 1). The Culp Area is comprised of parcel 38G09-0031-000 and the Shealer Area is comprised of parcels 38G09-0040-000 and 38G09-0040b-000. The Site also includes contaminated groundwater plumes emanating from the Culp Area and Shealer Area (Figure 1).

From 1969 to 1980, drums of paint sludge, industrial solvents and miscellaneous demolition waste were disposed of at both the Culp and the Shealer Areas. The disposal of this waste contaminated groundwater emanating from the Culp and Shealer Areas with volatile organic compounds (VOCs). The waste was generated by the Westinghouse Electric Corporation and the Susquehanna Pfaltzgraff Company and disposed of by the owners of the Shealer Area and the Culp Area properties. The two companies and the owners at the time of disposal of the Culp Area and Shealer Area were identified by EPA as potentially responsible parties (PRPs), although these property owners have passed away.

The Site was listed on the National Priorities List (NPL) on June 10, 1986. From 1984 until the installation of the community water supply well in February 1999, filtration systems and bottled water were provided to homes where the residential supply wells were contaminated with VOCs.

On March 10, 1987, Westinghouse Electric Corporation entered into an Administrative Settlement Agreement and Order on Consent (AOC) with EPA to perform a Remedial Investigation and Feasibility Study (RI/FS). During the RI groundwater was found to be mostly contaminated with chlorinated solvents, especially 1,1,1-trichloroethane. The RI/FS was completed in July 1993 and included a Human Health and Ecological Risk Assessment which concluded that a response action was required for soil, sediment and groundwater.

B. Selected Remedy

In 1995, EPA published a ROD for the Site. Although the objectives of the remedial action were not specifically identified as Remedial Action Objectives, the ROD states that the Selected Remedy will protect the public from exposure to contaminated groundwater and contaminated soil, and will protect aquatic life by removal of the contaminated sediment.

The Selected Remedy outlined in the ROD consists of the following components:

- Provisions for an alternate water supply to the affected residences from a single community water supply well.
- Construction and operation of a groundwater treatment system that will contain, extract, and treat contaminated groundwater.
- Discharge of the treated groundwater to the unnamed tributary to Rock Creek and/or Rock Creek, or for use as a non-potable water supply.
- Provisions for periodic groundwater monitoring during and after completion of groundwater remediation.
- Excavation and off-site disposal of contaminated soil from the Culp and Shealer Areas that has lead concentrations greater than 400 milligrams per kilogram (mg/kg).
- Excavation and off-site disposal of contaminated sediment from the Culp Area that has zinc concentrations greater than 270 mg/kg.
- Land use restrictions shall be incorporated into the deeds for the Shealer and Culp Area properties owned by the PRPs to limit future land-use of impacted groundwater and soil in the designated areas of the properties where groundwater contaminant concentrations exceed the action levels. The deed restrictions shall also be placed to minimize impact to the groundwater and to minimize any interferences to the cleanup. The restrictions shall remain in effect until the cleanup criteria are achieved throughout the Site.

C. Remedy Implementation

EPA issued a Unilateral Administrative Order (UAO) to Westinghouse Electric Corporation, which is now the CBS Corporation (CBS), and Susquehanna Pfaltzgraff Company on July 9, 1997, pursuant to Section 106 of CERCLA, 42 U.S.C. § 9606, EPA Docket No. III-97-100-DC, which required performance of the remedial design and remedial action.

The construction of the community water supply system started on July 6, 1998 and was completed on February 24, 2000. The system was designed and constructed to provide potable water for up to 14 residential connections serving up to 24 people. Currently, five residences have connections to the community water supply well. The system includes about 3,600 feet of distribution piping and a building that holds pressure regulation and chlorine disinfection systems. The community water supply well is located on the northwest corner of the Culp Area and the piping runs to the properties along Shrivvers Corner Road. CBS is operating the community water supply system and performing monitoring as required by the UAO.

There is a groundwater extraction and treatment system on both the Culp and Shealer Areas that started operations in November of 2002. Each treatment system has three extraction wells designed to capture the contaminated groundwater. There are also additional extraction wells

and piping located on a property south of the Shealer Area. The treatment system at the Culp Area consists of an air stripper while the treatment system at the Shealer Area consists of an aqueous-phase carbon treatment. The treated groundwater at the Culp Area is discharged to an unnamed tributary to Rock Creek and treated groundwater at the Shealer Area is discharged to a pond located on an adjacent property before it flows to an unnamed tributary to Rock Creek.

Annual groundwater samples are collected from monitoring wells, extraction wells and residential supply wells to evaluate the groundwater extraction and treatment systems. Results from the annual groundwater monitoring indicates there are two VOC groundwater plumes. The Shealer Area plume originated at the southern side of parcel 38G09-0040-000 and has extended out in all directions with the predominant flow direction toward the northwest. The Culp Area plume originated at the eastern side of parcel 38G09-0031-000 and has extended out in all directions with flow direction toward the northwest with a component to the southwest. Both VOC groundwater plumes have extended past the property boundaries of the Culp and Shealer Areas (Figure 1).

D. Summary of Institutional Controls

In the 1995 ROD, EPA identified the need for ICs at the Site. ICs are non-engineered instruments, such as administrative and legal controls, that help minimize the potential for human exposure to contamination and/or protect the integrity of a response action.

The ICs required by the ROD consist of the following: Land use restrictions shall be incorporated into the deeds for the Culp Area and the Shealer Area to limit future land-use of impacted groundwater and soil in the designated areas of the properties where groundwater contaminant concentrations exceed the action levels. The deed restrictions shall also be placed to minimize impact to the groundwater and to minimize any interferences to the cleanup.

The ICs required by the ROD have been implemented via the following instruments:

1. A Restrictive Covenant was recorded with the Adams County Recorder of Deeds for the Culp Area, parcel 38G09-0031-000, on March 21, 2007.
2. Environmental Covenant/Declaration of Restrictive Covenants were recorded with the Adams County Recorder of Deeds for the Shealer Area, parcels 38G09-0040-000 and 38G09-0040b-000, on March 19, 2009.

These Restrictive Covenants grant a permanent right of access over the properties to CBS for purposes of implementing, facilitating and monitoring the remedial action and impose activity and use restrictions on the properties that will run with the land. The use restrictions prohibit using or extracting groundwater on the properties for any purpose, with the exception of groundwater extracted in connection with the groundwater remediation systems. The restrictions also prohibit interference with the groundwater remediation systems or community water supply system and prohibit excavation or disturbance of earth within 50 feet of the ground water remediation system or community water supply system features, except with prior written approval by CBS. The restrictions also prohibit construction of any new buildings on the

properties unless the property owner first provides CBS with a certified report with detailed plans for mitigating any potential vapor intrusion into the building. In addition, if such buildings are constructed, the owner of the property must provide CBS with a signed statement that the mitigation measures were included in the construction of the building.

III. DESCRIPTION OF SIGNIFICANT DIFFERENCES AND THE BASIS FOR SUCH DIFFERENCES

This ESD will modify the Selected Remedy to include the implementation of additional ICs as described in detail below:

1. Restrict the installation of new residential supply wells within the entire extent of the groundwater contaminant plume unless previously approved in writing by EPA and the Pennsylvania Department of Environmental Protection (PADEP).
2. Prevent damage to the community water supply system and groundwater extraction systems piping.

These modifications, collectively, represent a significant change to the Selected Remedy with respect to scope and performance. The ICs collectively will remain protective of human health and the environment, will comply with Federal and State requirements that are applicable or relevant and appropriate, and will be cost effective.

A. Documentation of Institutional Controls (ICs)

As documented in the February 8, 2018 Data Summary Report for the Site, the VOC groundwater concentrations exceed their respective Maximum Contaminant Levels (MCLs), set forth in the National Primary Drinking Water Regulations, 40 C.F.R. §§ 141.11 – 12 and 141.61-62, or to 10^{-6} health-based risk levels for the compounds for which MCLs are not established, outside the Shealer Area and the Culp Area. Additionally, piping for the community supply well system and groundwater extraction and treatment systems are located on parcels of land that do not have a restrictive covenant. The 1995 ROD did not require ICs on parcels not owned by the PRPs.

Additional ICs are necessary at the Site to restrict activities that could interfere with the community supply well and groundwater extraction and treatment systems; and to prohibit exposure to contaminated groundwater. The ICs shall include the following restrictions in order to protect the Selected Remedy and human health and the environment. The additional ICs have been implemented specifically as follows:

1. Straban Township Ordinance § 135 Wells – Requires a permit from the Township before any new water supply wells may be installed in Straban Township.
2. EPA letter dated March 8, 2018 to Straban Township requesting that all well permits proposed in designated parcels associated with the Shriver's Corner Superfund Site are forwarded to EPA for review to determine if the proposed well is being installed within

an area groundwater contamination. The area for permit review was classified as a Well Restriction Area and is shown on Figure 1.

- a. EPA and PADEP will review the proposed well location to determine if the well is likely to be impacted by groundwater contamination from the Site; and
 - b. EPA and PADEP will recommend that Straban Township approve or disapprove of the proposed well location or recommend an alternate well location that is unlikely to be impacted by groundwater contamination from the Site.
3. PA One Call protection on the water supply line and groundwater extraction well piping.

IV. SUPPORT AGENCY COMMENTS

In accordance with 40 C.F.R. § 300.435(c)(2), EPA has consulted with PADEP concerning the changes to the Selected Remedy in this ESD. EPA received a letter dated June 28, 2018, indicating that PADEP concurs with the remedy as amended by this ESD. This letter of concurrence can be found in the Administrative Record.

V. STATUTORY DETERMINATIONS

EPA has determined that the modified remedy described in this ESD complies with the statutory requirements of Section 121 of CERCLA, 42 U.S.C. § 9621. EPA has determined that the Selected Remedy, as modified by this ESD, will remain protective of human health and the environment, will comply with Federal and State requirements that are applicable or relevant and appropriate to this remedial action, and will be cost-effective.

VI. PUBLIC PARTICIPATION

As required, EPA will publish a notice of availability and a brief description of this ESD. In accordance with CERCLA § 117(d) and NCP § 300.825(a), this ESD and supporting information will become part of the Site's Administrative Record which is available for review at the local repository and at EPA Region III office.

VII. SIGNATURE

This Explanation of Significant Differences modifies the Selected Remedy set forth in the ROD for the Shriver's Corner Superfund Site to include additional institutional controls which will restrict the installation of residential supply wells within the groundwater contamination plume and prevent damage to the community water supply system and groundwater extraction and treatment systems.

Approved by:



Karen Melvin, Director
Hazardous Site Cleanup Division
EPA Region III

JUL 9 2018

Date

