

**CRATER RESOURCES INC.
SUPERFUND SITE**

Keystone Coke Co. / Alan Wood Steel Co.

Community Relations Plan



Prepared for

**U. S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, Pennsylvania 19103**

July 2000

TABLE OF CONTENTS

Section	Page
1	OVERVIEW OF THE COMMUNITY RELATIONS PLAN.....3
2	EPA BACKGROUND.....4
2.1	Superfund Programs.....4
2.2	Relevant EPA Groups.....5
2.3	State Role.....6
3	SITE HISTORY AND DESCRIPTION.....7
3.1	Site History.....7
3.2	Site Description.....7
3.3	Site Contamination.....9
3.4	Site Risks.....12
3.5	EPA Actions to Date.....14
4	COMMUNITY BACKGROUND.....16
4.1	Community Profile.....16
4.2	Community Involvement and Concerns.....17
4.3	Community Interviews Summary.....18
4.4	Community Concerns.....23
5	COMMUNITY RELATIONS PLAN OBJECTIVES.....25
6	COMMUNITY INVOLVEMENT ACTIVITIES.....26
APPENDICES	
A	LIST OF CONTACTS.....30
A.1	Federal Elected Officials.....30
A.2	State Elected Officials.....31
A.3	Local Officials.....31
A.4	U.S. EPA Region III Officials.....32
A.5	Pennsylvania Department of Environmental Protection.....32
A.6	Media.....33
A.7	Other Interested Parties.....34
B	INFORMATION REPOSITORIES & MEETING LOCATION.....35
C	GLOSSARY OF TECHNICAL TERMS.....36
D	TECHNICAL ASSISTANCE GRANT (TAG).....40

MAPS

1 SITE LOCATION.....41

2 SITE LAYOUT.....42

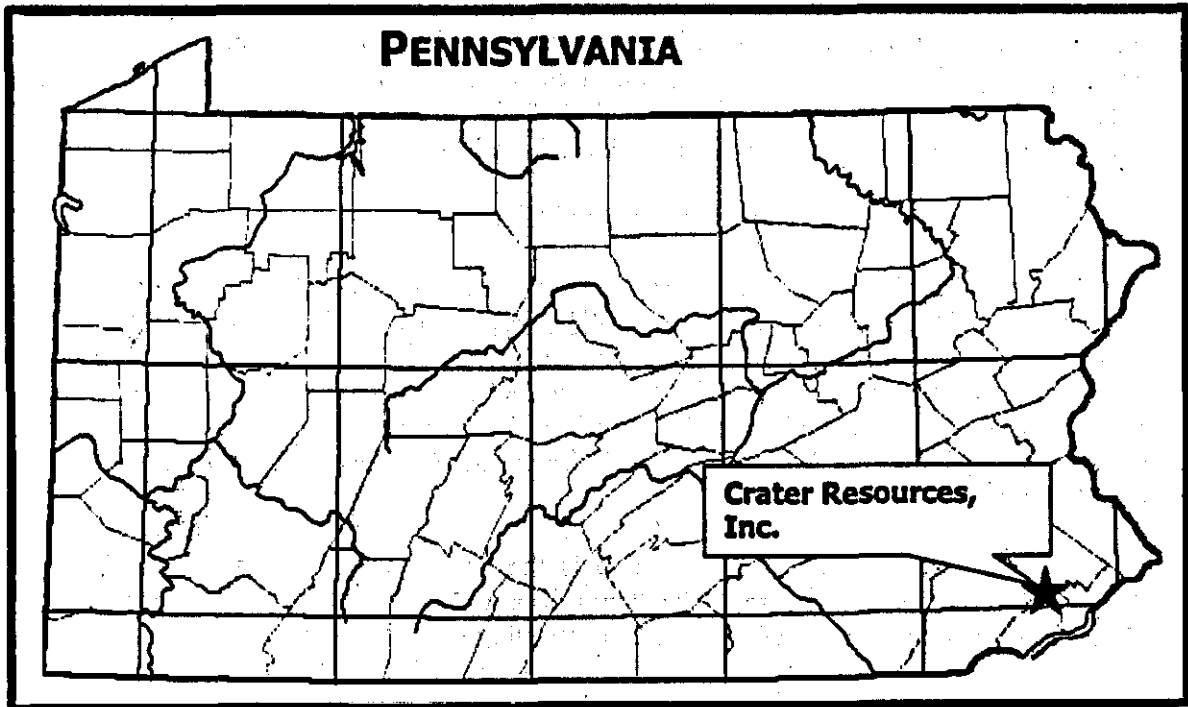
3 SOIL SAMPLE LOCATIONS43

4 MONITORING WELL LOCATIONS.....44

TABLES

1 POTENTIAL EXPOSURES.....13

2 TIMING OF COMMUNITY INVOLVEMENT ACTIVITIES.....29



SECTION 1 Overview of the Community Relations Plan

The *Community Relations Plan (CRP)* identifies issues of community concern and interest related to the Crater Resources Site (the Site), located in Upper Merion Township, Montgomery County, Pennsylvania.

This is the first known CRP done for this Site and contains information that the U.S. Environmental Protection Agency (EPA) Region III office has used in conducting community interviews and will use in implementing a *Proposed Remedial Action Plan (PRAP)* during the actual *Superfund cleanup* process at the Site.

The information in this CRP will help EPA assess past community involvement efforts at or near the Site, identify and address current areas of concern, and guide EPA staff in holding additional public meetings.

It is hoped that the CRP will:

- Encourage community participation at the Proposed Plan and ensuing cleanup.
- Provide two-way communication between EPA and the community.
- Ensure that the community has an opportunity to provide input into the decisions regarding cleanup actions at the site.

As part of addressing community needs, EPA will continue to keep community members informed and offer them opportunities to provide input regarding the cleanup. In addition, EPA will encourage the continued participation of citizen groups and individuals who have devoted time and effort to site-related activities and to apply for a *Technical Assistance Grant (TAG)*. See Appendix D for more information on obtaining a TAG.

Words highlighted in *italicized* text are defined in Appendix C.

This CRP was developed for the Crater Resources (Keystone Coke Company/Alan Wood Steel) Superfund Site under Contract Number 68-S3-99-02 with EPA Region III. EPA Region III is conducting activities at the Site under the guidelines of the *Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)*, a federal law passed in 1980 and commonly known as "Superfund"; the *Superfund Amendments and Reauthorization Act (SARA)*, enacted in 1986; and the *National Oil and Hazardous Substances Pollution Contingency Plan (NCP)*, revised in 1990.

EPA Region III based out of Philadelphia is the agency with primary responsibility for all Superfund activities at the Site. The Pennsylvania Department of Environmental Protection (PADEP) acts as a support agency at the Site, assisting EPA where necessary.

SECTION 2

EPA Background

2.1 Superfund Program

Superfund cleanups are very complex and require the efforts of many experts in science, engineering, public health, management, law, community relations, and numerous other fields. The Superfund program is managed by the EPA in cooperation with individual states and tribal governments. Superfund locates, investigates, and cleans up hazardous waste sites.

The Superfund program is a federal program designed to clean up uncontrolled and abandoned hazardous waste sites. Superfund was created in 1980 under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and was amended in 1986 with the Superfund Amendments and Reauthorization Act (SARA). Superfund is guided by the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). The NCP outlines the procedure that EPA must follow when investigating a release of hazardous materials into the environment. Under CERCLA, EPA has the ability to:

- Stop releases or prevent possible releases of hazardous substances.
- Force parties responsible for the contamination to conduct or pay for cleanup of the site.
- Provide funding for cleanup activities when money is not available from responsible parties. Funding is provided through the Superfund program by a tax on the chemical and petroleum industries.

Identifying Sites for Cleanup

EPA investigates hazardous waste sites throughout the U.S. and U.S Territories. A preliminary assessment and site inspection are done at the Site to determine the type of contamination, the amount of contamination, and the amount of environmental damage the contamination may cause. The site is evaluated using the *Hazard Ranking System (HRS)*. The Hazard Ranking System is a measurement tool that calculates a score based on the potential of a hazardous substance moving from the site through the air, water, or soil. EPA places sites with a HRS score of 28.50 or higher on the *National Priorities List (NPL)*. Once a site is named as a Superfund site, it will remain a Superfund site, even after the cleanup is completed. However, the site can be removed from the NPL.

Selecting and Implementing the Cleanup Plan

After the site is placed on the NPL, EPA performs a *Remedial Investigation (RI)* and *Feasibility Study (FS)*. The Remedial Investigation identifies the types and amounts of site contamination and determines the threat this contamination poses to human health and the environment. The Feasibility Study examines information provided by the remedial investigation activities and evaluates possible cleanup methods that can be used to remove or reduce contamination at a site. EPA will take the information from these studies and announce a recommended cleanup method in the Proposed Remedial Action Plan (PRAP). After the PRAP is announced, a 30-day *public comment period* begins so that the community may offer comments on EPA's proposed actions. After reviewing the public's comments, EPA may decide to revise the recommended cleanup

method originally announced in the PRAP. The final selection is published in the *Record of Decision (ROD)*.

After the Record of Decision has been finalized, the next steps in the Superfund process are the *Remedial Design* and *Remedial Action*. The Remedial Design is the engineering phase when drawings and specifications are developed for the Remedial Action at a site. It is similar to a blueprint or work plan. The Remedial Action is the actual construction or implementation of the design created for the cleanup of a site. If any changes need to be made to the ROD during the cleanup, these changes will be announced in a document called an Explanation of Significant Differences (ESD). When the cleanup actions have been completed at a site, EPA will remove that site from the NPL.

2.2 Relevant EPA Groups

EPA is headquartered in Washington D.C. and has ten regional offices located throughout the U.S. All offices have both a community relations and technical staff available to assist with Superfund sites. EPA Region III includes Pennsylvania, Delaware, Maryland, Virginia, and West Virginia. The EPA Region III office is located in Philadelphia, Pennsylvania. (See Appendix A of this CRP for contact information.) Following is information on the various EPA branches that have involvement with the Crater Resources Site.

Hazardous Site Cleanup Division (Region III)

HSCD oversees the Superfund program and is responsible for all cleanup activities at Region III sites contaminated by hazardous waste. This division is comprised of four branches: Enforcement and Federal Facilities, Remedial, Removal, and Technical and Administrative Support. HSCD focuses on emergency and long-term cleanup of hazardous materials that pose an immediate threat to human health and the environment due to improper or uncontrolled disposal practices, or accidents in the handling, transporting, or storing of hazardous wastes.

Superfund Community Involvement Section (Region III)

This section manages communication activities taking place at the Superfund site. The Superfund Community Involvement Section evaluates the communication needs for each site on an individual basis. Based upon the community's needs, EPA develops a community relations plan to enhance communication and community involvement at the site. This section is responsible for overseeing the communication between EPA, residents, public officials, media, and community groups interested in the Superfund process. EPA assigns a *Community Involvement Coordinator (CIC)* for each site. The CIC for the Crater Resources Site is Bill Hudson. His address and phone number can be found in Appendix A of this CRP.

Superfund Remedial Branch (Region III)

This branch is responsible for overseeing all long-term cleanup work that takes place at the site. These activities include site assessments, remedial investigations, feasibility studies, site sampling, and any other cleanup activities associated with the site. EPA assigns a *Remedial Project Manager* for each site. The RPM is responsible for supervising the work performed at the site by EPA staff, private contractors, and any other parties involved with the site cleanup.

The RPM for Crater Resources is Andrea Lord. Her address and phone number are located in Appendix A of this ERP.

Superfund Removal Branch (Region III)

EPA's Superfund Removal Branch manages short-term and emergency removal responses. This action is only required when there is an accidental release of hazardous substances at a site, which requires immediate attention. This branch also oversees the stabilization efforts at sites on the NPL until a site assessment has been completed and a long-term cleanup method has been approved.

Agency for Toxic Substances and Disease Registry (ATSDR)

The ATSDR is an agency of the U.S. Department of Health and Human Services. It was created in 1980 under Superfund law to prevent exposure, adverse human health effects, and diminished quality of life associated with exposure to hazardous substances from waste sites, unplanned releases, and other sources of pollution present in the environment. ATSDR is not a regulatory agency like the EPA. It is a public health agency that advises EPA on the health aspects of hazardous waste sites and spills. ATSDR is required under Superfund law to become involved with all sites proposed to the NPL. Specifically, ATSDR conducts public health assessments of NPL sites, as well as all sites proposed for the NPL.

2.3 State Role

Pennsylvania Department of Environmental Protection

PaDEP is the state support agency for EPA-led studies and cleanup at Superfund sites in Pennsylvania. PaDEP's involvement in Superfund sites includes reviewing and commenting on site work plans, studies, and cleanup methods, participating in community relations activities, and providing technical assistance to EPA when needed. See Appendix A for information on how to contact the PaDEP representative for the Crater Resources Site.

SECTION 3 Site History and Description

3.1 Site History

The Alan Wood Steel Company and its successors (Alan Wood) operated a coke and coke byproduct manufacturing facility in nearby Swedeland, Pennsylvania from 1918 until 1977. The facility was located on the west side of the Schuylkill River, approximately one mile northeast of the Site. After Alan Wood declared bankruptcy in 1977, the facility and property were first leased and subsequently sold to the Keystone Coke Company (Keystone Coke). Keystone Coke operated the facility from 1978 until 1981, when all operations at the facility ceased.

Waste *ammonia* liquor (WAL) was a liquid waste generated during the coke byproduct recovery process, and contained light oils, tars containing *phenolic compounds*, *naphthalene*, ammonia, and wastewater. WAL was pumped via pipeline from the Alan Wood facility to Quarries 1, 2, and 3. Remnants of the pipeline are still visible near the western edge of Quarry 3.

3.2 Site Description

The Site covers 50 acres of partially developed land located approximately one mile south of the King of Prussia section of Upper Merion Township, Montgomery County, Pennsylvania (Map 1). Portions of the Site are currently being developed by private entities. The Site consists of several subdivided parcels, now owned individually by Crater Resources, Inc., Each Parcel As Is, Inc., Out Parcel, Inc., RT Option, Inc., Liberty Property Trust, Inc., and the Gulph Mills Golf Club (Golf Course). Four former quarries (Quarries 1, 2, 3, and 4) are located on the Site and cover approximately 14 acres. In addition, two small areas, known as Areas 5 and 6 are on the property. Portions of the former pipeline, which carried the waste ammonia liquor (WAL) from the former Alan Wood Steel facility, are also in existence.

Contamination has been found in the soil, *groundwater* and *sediment* in and surrounding Quarries 1, 2, 3, and 4 and Areas 5 and 6. In addition, contamination has been found in the soils along the route of the former WAL pipeline. A brief description of Quarries 1, 2, 3, and 4, Areas 5 and 6, and the WAL pipeline follows. The locations of the Quarries and Areas 5 and 6 are shown on Map 2.

Quarry 1

Quarry 1 is approximately two acres in area. From the 1920s through the 1960s, the Alan Wood Companies used Quarry 1 for waste disposal when it was necessary to bypass Quarry 3. WAL was discharged to the Quarry through a pipeline that led from the *coking* facility to the Site. The volume of waste disposal is not known. Quarry 1 has since been filled with general fill and construction and demolition debris.

Quarry 2

Quarry 2 is approximately 0.7 acres in area. The Alan Wood Companies also used Quarry 2 for intermittent solid waste disposal from the 1920s through the 1960s. As was the case with Quarry 1, the discharge of WAL at Quarry 2 occurred when Quarry 3 was periodically bypassed. Quarry 2 has since been filled with general fill and construction and demolition debris.

Quarry 3

Quarry 3 is the only open quarry remaining at the Site and covers an area of approximately eight acres, reaching a depth of 65 feet at its western end. Three ponds are located within the quarry. Remnants of a former dam are present at the eastern end of the quarry. The dam contains an overflow spillway on its northern end. The dam was originally constructed to contain the wastewater that was discharged to the quarry. The Alan Wood Companies discharged WAL directly to Quarry 3 through a pipeline, which extended from the facility to the Site, and entered Quarry 3 near its northwestern end.

Quarry 4

The Remedial Investigation found no evidence that Quarry 4 was used directly for WAL disposal, but it may have received contaminated water as a result of overflows from Quarry 3 and releases from the WAL pipeline. Quarry 4 has been filled with construction debris and general fill. A storm water detention basin and part of a building now cover a portion of the quarry.

Area 5

Area 5 is a large mound located approximately 100 feet southeast of Quarry 4. The mound consists primarily of natural fill material composed of clay, silt, and schist saprolite.

Area 6

Area 6 is a small depression located approximately 200 feet northeast of Quarry 4. Past reports have indicated the presence of a strong phenolic odor and a lens of tarry material in the subsurface. The owner recently removed all soil and materials in Area 6, determined to be geotechnically unstable through an investigation conducted by the property owner, so the property could be marketed for development.

WAL Pipeline

As mentioned previously, WAL was discharged directly into Quarries 1, 2, and 3. WAL was conveyed to the quarries from the Alan Wood plant through a 4-inch diameter steel pipeline. The pipeline was originally thought to exist solely as an aboveground pipeline, and portions were dismantled in 1989; however, portions of an underground pipeline have been discovered along the pipeline route. Past reports indicate that the pipeline experienced occasional breaks and leaks along the route from the Alan Wood Plant to the quarries.

In May 1997, during the Remedial Investigation, an underground section of the WAL pipeline was discovered approximately one mile from the Site, where it crossed beneath Flint Hill Road, before re-emerging as an aboveground pipeline. This section of pipeline was discovered during excavation of a stormwater culvert beneath Flint Hill Road. The pipe and adjacent impacted soil were removed and properly disposed of offsite.

In January 1998, Liberty Property Trust (Liberty) discovered a second section of underground pipeline on a parcel of land they purchased on and adjacent to the Crater Resources Site. Liberty removed all sections of the pipeline and associated contaminated soil on their property, completing the work in April 2000.

Additional sections of pipeline have since been removed by a *potentially responsible party* (PRP) for the Crater Site. An underground pipeline was found on property owned by Keystone Coke, Inc. between Flint Hill Road and Route 23, and was removed by Keystone Coke and their consultants in December 1999.

3.3 Site Contamination

Quarry 1

During the Remedial Investigation, seven subsurface soil samples were taken in Quarry 1. Sludge-like material was encountered in the northeastern portion of the quarry at a depth of 19 feet, and a zone of stained silty clay was encountered at a depth of 71 feet in the central portion of the quarry. These materials contained elevated concentrations of *volatile organic compounds* (VOCs), *cyanide*, and *PAHs*, with naphthalene levels reaching 2,900,000 micrograms per kilogram (ug/kg) and selenium reaching levels of 33.3 milligrams/kilogram (mg/kg). Some elevated levels of metals including aluminum (up to 30,500 mg/kg) and manganese (up to 2480 mg/kg) were noted at depths between 6 and 8 feet.

Quarry 2

Five soil samples were taken in Quarry 2. A layer of stained soil was observed starting eight feet below the surface and extending to depths of 23 feet. Several PAHs were detected in all of the soil samples collected from Quarry 2. Minor concentrations of cyanide were found in the stained material and in the sand at a depth of 50 to 52 feet. Several elevated levels of metals were present, including iron (up to 143,000 mg/kg) and manganese (up to 1530 mg/kg).

Quarry 3

Soils

The soils within Quarry 3 showed elevated levels of phenols and several PAHs. The *contaminants* include the following: benzo(a)anthracene at a range of 0.28 to 610 ug/kg; benzo(b)fluoranthene ranging from 0.7 to 690 ug/kg; benzo(a)pyrene ranging from 0.54 to 470 ug/kg; dibenz(a,h)anthracene ranging from 0.15 to 100 ug/kg; 2-methylnaphthalene ranging from 0.655 to 3500 ug/kg; indeno(1,2,3-cd)pyrene ranging from 0.6 to 330 ug/kg; and naphthalene ranging from 4.75 to 270,000 ug/kg. High levels of aluminum (up to 26,700 mg/kg) and iron (up to 52,500 mg/kg) were found in all soil samples taken in the quarry, and mercury (up to 49

mg/kg), arsenic (up to 660 mg/kg) and manganese (up to 11,400 mg/kg) were present in the subsurface soils.

Sediments

The sediments in the bottom of the three ponds in Quarry 3 are tarry in nature and contain elevated concentrations of several contaminants. These include: benzo(a)anthracene ranging from 14 to 2100 ug/kg; benzo(b)fluoranthene ranging from 30 to 3800 ug/kg; benzo(a)pyrene ranging from 18 to 2500 ug/kg; and naphthalene ranging from 27 to 37,000 ug/kg. Pond 1 sediments are between 10 and 16 feet thick; Pond 2 sediments vary from 0.5 to 5 feet thick; and Pond 3 contains 3 to 7 feet of sediments.

Quarry 4

The soils in Quarry 4 contain concentrations of PAHs, cyanide, and pesticides. Several metals including aluminum (up to 22,600 mg/kg), chromium (up to 331 mg/kg), iron (up to 113,000 mg/kg), manganese (up to 6200 mg/kg), and vanadium (up to 2140 mg/kg) are present in Quarry 4.

Other Surface Soil Samples

SS-1 and SS-2 (Map 3) were collected in the areas of where the pipeline valves were located. These samples contained concentrations of PAHs and metals, indicating that the pipeline leaked in this area. Contaminants included the following: aluminum at 9,995 mg/kg; iron at 51,700 mg/kg; and manganese at 1,940 mg/kg. Sample SS-3 was taken in a swale east of Quarry 3 and contained phenols and PAHs, including 6,600 ug/kg of benzo(a)pyrene. Several metals were also detected in these samples including iron at 64,900 mg/kg and manganese at 517 mg/kg.

Pipeline

Soil samples that were collected adjacent to and beneath a portion of the buried pipeline, which has since been removed by Liberty, indicated the presence of several PAHs and metals. These included aluminum (up to 27,700 mg/kg); chromium (up to 43.9 mg/kg); arsenic (up to 146 mg/kg); benzo(a)pyrene (up to 390 mg/kg); benzo(a)anthracene (up to 430 mg/kg); and benzo(b)fluoranthene (up to 420 mg/kg).

Area 5

One soil sample was taken from Area 5 and indicated low concentrations of PAHs and cyanide in the surface soils, but did not contain any volatile organic compounds (VOCs). Soil at 30 to 32 feet below ground surface contained low concentrations of carbon disulfide at 10 ug/kg, 2-butanone at 24 ug/kg, and bis (2-ethylhexyl) phthalate at 88 ug/kg. Some low levels of metals were detected in the sample, including aluminum at 2,520 mg/kg.

Area 6

A small lens of tarry material was found in a soil boring during a sampling event conducted by Pennoni Associates Inc. in 1993. The sampling was done by Pennoni to evaluate the condition of property owned by RAGM Settlement Corporation. The tarry material contained elevated VOCs, including *benzene* at 2100 ug/kg, and several PAHs, including naphthalene at 29,000,000 ug/kg. All soil and materials in Area 6, determined to be geotechnically unstable during an investigation by the property owner, were recently removed by a private contractor so the property could be marketed for development.

Groundwater

One round of groundwater samples was taken during the Remedial Investigation, between 1996-1998 (see Map 4, Monitoring Well Locations). The sampling indicated that the groundwater plume extends from Quarry 1, toward the northeast in a 4,000-foot long, 1,500-foot wide plume. Groundwater data collected during the Remedial Investigation concluded that groundwater flows primarily to the east, in the direction of the Schuylkill River.

In general, elevated levels of VOCs, semi-volatile organic compounds (SVOCs), and cyanide in the groundwater were found near the source of the quarries onsite. VOCs detected included acetone up to 420 milligrams per liter (mg/L), benzene up to 250 mg/L, and chloroform up to 3.9 mg/L. SVOCs detected include naphthalene up to 1300 mg/L, dibenzofuran up to 16 mg/L, 2,4-dimethylphenol up to 580 mg/L, 2-methylphenol up to 6300 mg/L, 4-methylphenol up to 24,000 mg/L, and phenol up to 19,000 mg/L. Cyanide was detected at levels up to 1,120 mg/L.

The monitoring wells located directly downgradient of each of the quarries tended to have high concentrations of metals including: arsenic (up to 49.85 mg/L), beryllium (up to 245 mg/L), chromium (up to 205 mg/L), and manganese (up to 33,600 mg/L). The metals concentrations were highest at the northeastern end of the Site.

Low concentrations of Site-related contaminants were detected in the monitoring wells that reach the outer edges of the groundwater plume. Some chlorinated VOCs were detected at low concentrations in the Golf Course well and the Pond well. Low concentrations of phthalates were also detected in several of the wells, across Renaissance Boulevard owned by Liberty. Chlorinated VOCs were detected in several of the wells sampled on the SmithKline Beecham property approximately 0.5 miles east of the Site.

Surface Water

Surface water is found in the three ponds in Quarry 3. Pond 1 is 90 feet by 200 feet and varies in depth from 3 to 12 feet. Pond 2 is 60 feet by 100 feet and ranges in depth from 3 to 7 feet. Pond 3 is 100 feet by 200 feet and ranges from 8 to 15 feet in depth. The surface water contains low levels of cyanide, iron, mercury, and selenium.

3.4 Site Risks

Following the Remedial Investigation, EPA conducted an analysis to evaluate the human health risks that could result if no remedial action was taken at the Site. The purpose of a *Risk Assessment* is to establish the toxicity, or degree of hazard, posed by contaminants at the Site, and to describe the routes by which humans could come into contact with these contaminants. Separate calculations are made for those substances that can cause cancer (carcinogenic) and for those that can cause non-cancer (non-carcinogenic), yet still adverse health effects.

The Risk Assessment determined that hazardous substances at the Site might present a potential threat to human health if they are not addressed by a remedial action. EPA has determined that a remedial alternative needs to be selected to reduce the future risks to acceptable levels. Actual or threatened releases of hazardous substances from this Site, if not addressed by a remedial action, present a current or potential threat to public health, welfare, or the environment.

The NCP established acceptable levels of carcinogenic risk for Superfund sites ranging from one excess cancer case per 10,000 people exposed, to one excess cancer case per one million people exposed. This translates to a risk range of between one in 10,000 and one in one million additional human cancer cases. Expressed as scientific notation, this risk range is between $1.0E-04$ and $1.0E-06$. Remedial action is warranted at a site when the calculated cancer risk level exceeds $1.0E-04$. However, since EPA's cleanup goal is generally to reduce the risk to $1.0E-06$ or less, EPA also may take action where the risk is within the range between $1.0E-04$ and $1.0E-06$.

The NCP also states that sites should not pose a health threat due to a non-carcinogenic, but otherwise hazardous condition. EPA defines a non-carcinogenic threat by the ratio of the contaminant concentration at the site that a person may encounter to the established safe concentration. If the ratio, call the Hazard Index (HI), exceeds one (1.0), there may be concern for the potential non-carcinogenic health effects associated with exposure to the contaminants at the Site. The HI identifies the potential for the most sensitive individuals to be adversely affected by the non-carcinogenic effects of chemicals. As a rule, the greater the value of the HI above 1.0, the greater the level of concern.

The media of concern evaluated in the Risk Assessment were surface soil, total soil (surface soil and subsurface soil combined), surface water, groundwater, and sediments. The potential exposure scenarios of Industrial Workers, Construction Workers, Adolescent Trespasser/Visitors, and Lifetime Resident are summarized in Table 1. Risks are shown in terms of the maximum cancer risk and the maximum hazard index for each scenario. It should be noted that the risks listed in the assessment refer to conservative exposure times and toxicity values, and do not represent risks from a one-time encounter with contaminants at the Site. Detailed descriptions of the risk factors and risk scenarios are included in the Final Baseline Risk Assessment in the Administrative Record.

**TABLE 1
POTENTIAL EXPOSURES**

<p>Adolescent trespasser/visitor</p>	<p>Ingestion, dermal absorption, and inhalation (dust emissions) of contaminants in:</p> <ul style="list-style-type: none"> • surface soil • sediment • surface water
<p>Current or future industrial worker</p>	<p>Ingestion, dermal absorption, and inhalation (dust emissions) of contaminants in:</p> <ul style="list-style-type: none"> • ground water • surface water • sediment • surface soil
<p>Future construction worker</p>	<p>Ingestion, dermal absorption, and inhalation (dust and airborne vapor emissions) of contaminants in:</p> <ul style="list-style-type: none"> • surface and subsurface soil
<p>Future resident</p>	<p>Ingestion, dermal absorption, and inhalation (vapor emissions) in:</p> <ul style="list-style-type: none"> • groundwater <p>Ingestion, dermal absorption, and inhalation (dust and vapor emissions) in:</p> <ul style="list-style-type: none"> • surface soil <p>Ingestion and dermal absorption in:</p> <ul style="list-style-type: none"> • sediment • surface water

3.5 EPA Actions to Date:

- On May 16, 1979, EPA conducted a Groundwater Monitoring Survey, which involved sampling of Quarry 3 and the surrounding area and included an investigation of possible sources of contamination threatening the Upper Merion Reservoir, a public drinking water source located about one mile to the northwest of the Site and operated by the Philadelphia Suburban Water Company. While conducting sampling at the Site, EPA found phenolic compounds, chlorides, naphthalene, and other organic contaminants in Quarry 3.
- EPA conducted additional sampling at the Site on May 25, 1979. Subsequently, EPA reported finding trans-1,2-dichloroethylene (DCE) in both Philadelphia Suburban Water Company's Upper Merion Reservoir and Quarry 3.
- On April 8, 1983, EPA conducted a Preliminary Assessment (PA) of the Site, followed by a Site Inspection (SI) on May 9, 1983 during which samples were obtained from Quarry 3 and from three of the monitoring wells that had been installed in 1982 by PaDEP in the vicinity of Quarry 3. The PA and SI revealed that hazardous substances were present in Quarry 3 including benzene, *toluene*, naphthalene, cyanide, zinc, arsenic, lead, phenolic compounds and polycyclic aromatic hydrocarbons (PAHs). Analysis of groundwater in the vicinity of the Site taken from the 1982 monitoring wells showed the presence of benzene and metals including arsenic, cyanide, lead, mercury, zinc, beryllium, nickel, cadmium, and selenium.
- In June 1990, EPA took additional samples at the Site. Samples were collected from waste and soil in Quarry 3, ponded water near the quarry, borings of fill material taken from an area believed to be Quarry 1, offsite monitoring and private wells, and the Upper Merion Reservoir. Waste in the Quarry 3 contained elevated levels of cyanide, arsenic, benzene, lead, zinc, PAHs, and other contaminants.
- The Site was proposed for listing on the National Oil and Hazardous Substances Pollution Contingency Plan National Priorities List (NPL) of uncontrolled hazardous substances releases pursuant to CERCLA Section 105, 42 U.S.C. ' 9605, in February 1992. The Site was listed on the NPL on October 14, 1992.
- On September 17, 1994, Beazer East, Inc., Keystone Coke Company, Inc., and Vesper Corporation (herein referred to as the ACrater Resources Participating Parties Group@ or ACrater PRP Group@) entered into an Administrative Order on Consent (AOC) under CERCLA Sections 104 and 122, 42 U.S.C. " 9604 and 9622. Under the AOC, the Crater PRP Group agreed to perform a Remedial Investigation/ Feasibility Study (RI/FS) at the Site to determine the nature and extent of the contamination at or from the Site, and to evaluate alternatives for remedial action to prevent, mitigate or otherwise respond to or remedy the release or threatened release of hazardous substances, pollutants, or contaminants at or from the Site.

- The RI field work was completed in January 1999 and EPA approved the RI Report on June 23, 1999. After completion of the RI, the Crater PRP Group commenced the FS to evaluate various remedial alternatives to address the nature and extent of contamination identified in the RI.
- In December, 1999, EPA completed a Human Health Risk Assessment (HHRA) to evaluate the human health risks that could result if no remedial action was taken at the Site. The HHRA, RI, and FS are available for review in the Administrative Record for the Site.
- On February 29, 2000, a draft FS report was submitted to EPA by the Crater PRP Group. However, on April 20, 2000, pursuant to Section IX.A.(3) (Submissions Requiring Agency Approval) of the AOC, EPA notified the Crater PRP Group of its intention to modify and subsequently approve the Draft FS Report. EPA has reviewed the Draft FS report and has completed an Addendum to the FS Report, which is available for review in the Administrative Record for the Site.
- On June 27, 2000 EPA presented its Proposed Remediation Plan to residents and officials at a public meeting at the township building. The public comment period ended on August 17. EPA accepted comments prior to adoption of a final remediation plan.

SECTION 4 Community Background

4.1 Community Profile

The Upper Merion Township Municipal Government services the estimated 26,290 residents that live in the community. The Township is located in the south central corner of Montgomery County at the intersection of the Pennsylvania Turnpike (Exit 24) and the Schuylkill Expressway (I-76). It is the largest of 62 municipalities in the County. Upper Merion Township is comprised of four communities: King of Prussia, Swedeland, Swedesburg, and portions of Wayne. The approximate racial breakdowns are:

92.2% White
3.7 % Black
3.6 % Asian
0.2% Indian
0.3% Other

The approximate age breakdown is as follows:

Under 5 years	5.4%
Ages 5-17	13.0%
18-24	10.3%
25-34	18.9%
35-54	27.2%
55-64	12.8%

There are 10,861 households with approximately 2.42 persons per household. Media Housing Sale Price is \$157,500, with 208 units being built between 1990-1997. Total housing units as of 1997 were 12,035.

It is governed by a five member elected Board of Supervisors that serves as the legislative and policy-making body. The board members are elected at large to staggered six-year terms. The Board is assisted by a full-time appointed Township Manager, who is responsible for day to day operations of the Township.

Located 16 miles northwest of Center City Philadelphia in Montgomery County, Upper Merion Township is a diverse area located at the intersection of several major highways. The Township has a thriving business community, anchored by the King of Prussia Court and Plaza, making it the second largest mall complex in the country. It is also home to the Valley Forge National Park. Both of these facilities are major tourist destinations attracting several million visitors each year. The Township is a net importer of labor, with more than twice as many jobs as there are residents. In addition to being a major center for retail sales, it has substantial corporate facilities for the pharmaceutical, aerospace and information management industries. Despite a strong business presence, Upper Merion retains its suburban character with a wide range of well-established residential neighborhoods.

4.2 Community Involvement and Concerns

The Crater Resources Site is located adjacent to the fifteenth green of the Gulph Mills Golf Course in the Hughes Park section and near the Swedeland section of Upper Merion.

The large Renaissance Office Complex is located along the northern boundary of the site.

The Swedeland section, which is near the Crater site, was settled in 1714 after Swedes who colonized in 1623 in Wilmington traveled up the Schuylkill River looking for more settlements. While the Swedeland community is comprised mainly of older row homes, some of which have been owned by the same families for generations, there has also been an influx of younger professionals in newer townhouse developments. One of these developments, directly across from Hughes Park, backs up to the Superfund site.

Currently, due to development issues on or near the site, community interest is at an elevated level. There have been numerous concerns expressed at various Upper Merion Planning Commission meetings. Residents do not want any more development in the Renaissance Office Complex. One office building has been built on one of the contaminated quarries (Quarry 4) and there are plans for future development between Quarries 1 and 2. The Planning Commission has stated that they will not allow any further development until the EPA approves of and responsible parties agree to a Remediation Plan.

In addition to the five member appointed Planning Council, the Township has an active seven member Environmental Advisory Committee. Members of this committee meet to review various environmental issues and make recommendations to the Planning Commission. The Planning Commission meets on the second Tuesday of each month (except for August) at 7 p.m. in the Atrium Conference Room of the Township Building, located at 175 W. Valley Forge Road. The EAC meets on the 2nd and 4th Wednesdays of each month in the Henderson Room at 7 p.m.

EPA Region III staff met with the EAC on March 14, 2000 to give an overview of the Crater Resources site and pending actions. Project Manager Andrea Lord gave an overview of EPA actions and Community Involvement Coordinator William Hudson gave an overview of the *Technical Assistance Grants (TAG)* program to help the leaders deal with analysis of technical matters.

Residents of Upper Merion Township have taken an active part in issues concerning zoning, public transportation, economic development and the environment. The nearby Gulph Mills Civic Association has been very active in this area, although there is currently no chair of the environmental committee. The Association has been added to EPA's mailing list.

Although some residents, local officials, and nearby businesses are aware of the identified contamination problem at Crater, the site information has not attracted the attention of the larger community. Localized community concerns appear to be those of traffic, further construction along Renaissance Boulevard, and the potential that Renaissance could one day be paved through to Crooked Lane, a residential neighborhood.

In March, 2000 a series of community interviews were held with individuals living in close proximity to the Site and with township officials. A half dozen of the interviews were conducted with individuals who had gone to a local Planning Commission meeting and who had expressed concerns over development on or near the Crater Site. The rest of the individuals were conducted by identifying homes near the site and going door-to-door to conduct the interviews. The township officials were identified by the township public information officers. The interviews were conducted in order to determine what people knew about the Site and how best to reach this community. A Summary of the responses follows:

4.3 Community Interviews Summary

Breakdown of Interviewees:

- 16 residents
- 3 employees of local businesses
- 4 Upper Merion Township employees

EPA interviewed 23 community members. Many of the responses total more than 23 because interviewees gave more than one response to each question. Some of the responses total less than 23 because all interviewees did not answer all questions.

Questions	Response Type	Number of Responses
How long have you lived in this community?	<ul style="list-style-type: none"> • Under 10 years • 10 – 30 years • 30+ years 	2 14 6
In general, what issues have received the most attention locally?	<ul style="list-style-type: none"> • Building too much/over development • Traffic • Lack of open space/green space • Quarry blasting • Don't know • Too much industry • Local junkyard • Highway construction • Sinkholes • Stormwater • General environmental issues 	12 8 3 3 3 2 2 2 1 1 1 1
Who do you consider to be leaders in the community?	<ul style="list-style-type: none"> • Township Supervisors • Don't know • Township Manager • Gulph Mills Civic Association • Don't live in area (work only) • Vera Kordek (outspoken citizen) • Township Planning Commission • Township Zoning Board • School Board 	11 4 3 3 2 2 1 1 1

<p>How sensitive is the local area to environmental issues on a scale from 1-10? (1 not sensitive, 10 extremely sensitive)</p>	<ul style="list-style-type: none"> • One • Two • Three • Four • Five • Six • Seven • Eight • Nine • Ten • Don't know • Depends on where you live • Very sensitive 	<p>0 0 1 1 1 0 3 9 4 3 2 1 1</p>
<p>What is the most important environmental issue facing the community today?</p>	<ul style="list-style-type: none"> • Building too much/overdevelopment • Superfund cleanup • Air Quality • Water Quality • Traffic • Don't know • Recycling • Littering 	<p>9 5 4 4 3 2 1 1</p>
<p>What individuals or organizations do you consider most credible when it comes to environmental issues?</p>	<ul style="list-style-type: none"> • EPA • Don't know • DEP • Township EAC • None • Gulph Mills Civic Association 	<p>9 6 5 3 3 1</p>
<p>Do you or any of your family members participate in any outdoor recreational activities in or around the Crater Resources area? If so, what type and where?</p>	<ul style="list-style-type: none"> • No • Playing/exploring • Hunting • Walking • Play golf at nearby course • Play at nearby park/playground • Bicycling • Ice skating • Jogging 	<p>9 7 4 3 3 2 1 1 1</p>

Are you aware of the environmental cleanup effort underway at the Crater Resources site?	<ul style="list-style-type: none"> • Yes • No 	<ul style="list-style-type: none"> 17 7
If so, what do you know about the environmental challenges at this site?	<ul style="list-style-type: none"> • Don't know • Acid in pits • Contaminated water • Hazardous chemicals on site • Building on contaminated site 	<ul style="list-style-type: none"> 10 5 4 4 2
Are you aware of the EPA's Superfund Program?	<ul style="list-style-type: none"> • Yes • Aware of it, but not sure of what it is • No 	<ul style="list-style-type: none"> 9 8 6
Are you aware that the Crater Resources site is undergoing the Superfund cleanup process?	<ul style="list-style-type: none"> • No • Yes • Aware of it, but not sure what it is 	<ul style="list-style-type: none"> 12 9 2
Where have you received information about the Crater Resources site cleanup effort?	<ul style="list-style-type: none"> • Word of mouth • Received no information • Township Cable channel • Newspaper • Workmen on site • Public meetings • Fliers/Fact Sheet • EPA • Library 	<ul style="list-style-type: none"> 6 5 4 4 3 3 2 1 1
Are you interested in the Crater Resources site cleanup effort?	<ul style="list-style-type: none"> • Yes • No 	<ul style="list-style-type: none"> 22 1
Have you or anyone you know had any problems that you think are attributable to the Crater Resources site?	<ul style="list-style-type: none"> • No • Not sure if they are site related • Yes • Don't know • None have been voiced yet 	<ul style="list-style-type: none"> 14 4 1 1 1
Do you think there is community interest/concern about environmental cleanup at the Crater Resources site?	<ul style="list-style-type: none"> • Yes • No • Don't know • There would be if more people were aware of it 	<ul style="list-style-type: none"> 16 3 3 1

<p>Do you have any current concerns about the environmental cleanup effort at the Crater Resources site?</p>	<ul style="list-style-type: none"> • Not getting accurate information • No concerns • Development on site after cleanup • Air quality during cleanup (dust) • General concerns • Safety of site in present condition • Just want it cleaned up • Impact of site on property values • Not sure 	<p>5 5 4 4 3 3 2 2 1</p>
<p>Were you aware that there is an upcoming meeting to review the progress and provide input for the Crater Resources site?</p>	<ul style="list-style-type: none"> • No • Yes 	<p>20 3</p>
<p>Would you have any interest in attending these meetings?</p>	<ul style="list-style-type: none"> • Yes • Depends on date and time • Maybe • No • Watch it on cable channel • Don't know 	<p>10 5 4 2 1 1</p>
<p>What kind of information would you like about the cleanup effort?</p>	<ul style="list-style-type: none"> • Information on specific hazards at the site • Cleanup timeline • Cleanup process • Safety of cleanup process to residents • Safety of site after cleanup • As much general information as possible • Plans for development of site after cleanup • History of the site • Effect on property values 	<p>10 9 8 5 5 5 3 1 1</p>
<p>Do you know of any environmental or community groups in the area that may be interested in the cleanup activities?</p>	<ul style="list-style-type: none"> • No • Township EAC • Township officials • Swedeland Civic Association • Gulph Mills Civic Association • Regular public meeting attendees • HOA (Cooper Mill Station) • HOA (Crooked Lane Crossing) • Health Department 	<p>11 7 2 2 1 1 1 1 1</p>

What would be the best way to keep the community informed/involved?	<ul style="list-style-type: none"> • Mailings • Cable channel • Newspaper • Public meetings • Schools • Library • HR of local companies • Don't know 	<p>12 8 5 2 2 1 1 1</p>
What are your primary sources of information about the community?	<ul style="list-style-type: none"> • Newspaper • Word of mouth • Township newsletter/mailings • Cable channel • Public meetings • Talk radio • Television (local news) • Township files 	<p>8 8 5 4 2 2 1 1</p>
What newspapers do you read for local news?	<ul style="list-style-type: none"> • <i>The Times Herald</i> • <i>The Philadelphia Inquirer</i> • <i>King of Prussia Courier</i> • None • <i>Wayne and Suburban Times</i> • <i>Montgomery Life</i> • Channel 6 • Don't know 	<p>17 9 6 3 2 2 1 1</p>
What TV stations do you watch for local news?	<ul style="list-style-type: none"> • Township cable channel • Channel 10 (NBC) • Channel 6 (ABC) • Channel 3 (KYW) • None 	<p>8 7 7 4 3</p>
What radio stations do you listen to for local news?	<ul style="list-style-type: none"> • KYW 1060 AM • None • WWDB • WIP • WXTU • B101 	<p>13 5 1 1 1 1</p>
Do you have Internet access?	<ul style="list-style-type: none"> • Yes, would like to receive information this way • Yes, but do not want to receive info. this way • No 	<p>9 9 7</p>

We are developing a mailing list of people who are interested in the environmental restoration efforts at the Crater Resources site. Can you identify other people to add to the list?	• No	10
	• Provided name of interested person(s)	6
	• Know people, but prefer to ask them first	2
	• Township EAC	2
	• Immediate neighborhood	1

4.3 Community Concerns

Groundwater contamination

Groundwater contamination in the King of Prussia area has been an issue of concern since the late 1970s when Philadelphia Suburban Water Company (PSWC) identified TCE contamination in the Upper Merion Reservoir. The contamination prompted an EPA investigation and the eventual addition of the Stanley Kessler Superfund Site to the NPL. At the time of the TCE contamination, EPA sent press releases to local newspapers to alert area residents of the potential threat to the PSWC drinking water supply. Both the Stanley Kessler site and the Henderson Road site are in close proximity to the Crater Resources Site.

With the cooperation of local, state, and federal officials, PSWC held a series of public meetings on the TCE contamination issue. The Gulph Mills Civic Association was active in organizing community support for the removal of TCE from the water supply. In 1981, PSWC installed an air stripping facility. Since then, residents have not called for additional action from PSWC or any other government agencies on groundwater or drinking water contamination.

Residents living near the Crater Resources Site are hooked up to public drinking water and appear to be confident that the public water supply is treated for removal of volatile organics. Residents do not believe the drinking water poses any health risks.

Township officials also noted that they have had an ongoing and continuing problem with sinkholes opening up in the township. Several were concerned that the geology in the area lent itself to further groundwater contamination beyond its borders.

County-wide hazardous waste problems, including Superfund Sites

Upper Merion Township, with the assistance of EPA and PA DEP has identified some seventeen hazardous waste sites in the community. In addition to Crater Resources, three sites, Tyson's Dump site, Kessler Site and Henderson Road site are Superfund sites. Residents, the business community, and local officials recognize that Upper Merion Township has an area-wide problem with hazardous waste. The Environmental Advisory Council has been given the responsibility to review and comment on environmental and toxic waste remedial activities in the area. The EAC has inquired about Technical Assistance Grants (TAG) available from the EPA regarding the Crater Site.

Health Effects

The majority of residents have not complained about health effects from the contamination at Crater Resources. They do cite individuals they have known who have contracted various forms of cancer, but all are at a loss as to whether they contracted cancer because of this Site, another site, or an unrelated environmental pollutant.

It should be noted that a middle-aged woman who had lived in the area all of her life recalled playing in and around the contaminated quarries. She relayed one experience when she and her brothers had been rolling around in the quarries and after the laundry was washed, the clothes they had worn while in the quarries had fallen apart. The woman does have a noticeable slurring of speech and obvious physical ailments. She said she also had worked extensively in the chemical industry for many years and could not say whether her condition was attributable to her professional work or her exposure to the Crater Site.

Regional Development and Property Values

Significant growth in the area, due in large part to the close proximity to Philadelphia and the increase in commercial and residential construction has led to extensive development in the Township. At the present time, the local Planning Commission has put on hold any further approvals for development in the Renaissance Office Complex until EPA has put forth a proposed remedy for the Site. The complex is located along Renaissance Boulevard and comprises a half dozen multi-level office buildings and four single story office structures. Residents are concerned that the boulevard will extend through to Crooked Lane, further impacting traffic in their residential area. Local residents have also expressed concern that existing groundwater contamination may impact their property values.

SECTION 5 Community Relations Plan Objectives

The Community Relations Plan for Crater Resources Superfund Site is used to assist the EPA in providing information to community members regarding Site activities and the Superfund process. The decision making and cleanup process for the Site is greatly enhanced by community involvement. By meeting these objectives, the EPA can ensure that residents of Upper Merion Township are well informed about Site conditions that may affect them.

- 1) Provide timely, site-specific information to community members.**
 - EPA will use fact sheets, newsletters, public notices, news releases, public meetings, and various other means to explain the phases of the Superfund process as well as information specific to the Crater Resources Site. EPA will also name a Community Involvement Coordinator to answer all questions directly. The information will be explained in general terms so that community members can easily understand the process.

- 2) Provide opportunities for community input.**
 - EPA will participate in community outreach activities such as, public availability sessions, site tours, and community interviews to encourage area residents to take an active role in the Superfund process. EPA will encourage community members to contribute to decisions that will have a long-term impact on their community.

- 3) Enhance communication between EPA, Upper Merion Township officials, and the local media.**
 - EPA will provide Upper Merion Township officials with timely information about Site activities and will answer any questions they may have. EPA will also distribute Site related information to the local media so that they can convey accurate information about the Site to community members.

SECTION 6

Community Involvement Activities

By performing the following activities, EPA can ensure that community members have the means to understand the actions taking place at the Crater Resources Site and the Superfund process in general. This information will enable the community to make informed decisions regarding further action at this Site.

- **Designate an EPA Community Involvement Coordinator (CIC) to handle Site inquiries.**
By naming a CIC for this Site, EPA can streamline the information process. Interested parties will be able to contact the CIC during all phases of the Superfund process. The CIC will respond promptly and accurately to all inquiries.

Bill Hudson has been named as the CIC for this Site. He is located in the Philadelphia office and works closely with Andrea Lord, EPA's Remedial Project Manager for the Site. Their addresses and phone numbers are located in Appendix A of this CRP.

- **Prepare and distribute fact sheets to residents and interested parties.**
To date there have been four fact sheets developed and distributed to inform affected citizens of the schedule, scope of work, and technical activities. (see attachment)

A mailing list of over 900 individuals has been developed for this site. Local residents, interested business, elected officials, and local media are included on this list. The mailing list was developed based on community surveys and local tax maps in order to contact residents who live in close proximity to the Site. A short contact list is located in Appendix A of this CRP. The mailing list will be updated and revised throughout the course of this project.

- **Maintain information repositories in the local area.**
The repositories are used by interested parties to reference information regarding Site activities and the Superfund process. The information found in the repository includes documents located in the *Administrative Record File*, as well as the CRP, information on the Technical Assistance Grant (TAG), and information on the Superfund process.

An *information repository* has been established at the Wolfsohn Public Library in the Upper Merion Township Building. Citizens can also review the file at EPA Region III offices at 1650 Arch Street in Philadelphia. Some of the information is also posted on the EPA web site at: www.epa.gov/reg3hwmd/super/crater/menu.htm

- **Keep local officials of Upper Merion Township and Montgomery County well informed about Site activities.**

By maintaining two-way communication with local officials, EPA can learn more about Upper Merion Township and the needs of community members. Local officials can also be helpful in answering residents' questions and disseminating information. EPA will meet personally with and provide written materials to local officials about developments at the Site. The addresses and phone numbers of local officials are located in Appendix A of this CRP.

EPA has conducted meetings with and phone calls to local and state officials to inform them of the schedule of activities, scope of work, and any major findings during the remedial investigation and feasibility study. Specifically, EPA will continue to work with Ed Higgins, Public Information Officer for Upper Merion Township, and Eileen Rodrique, Assistant Public Information Officer and long-time resident near the Crater Resources Site.

- **Keep local media well informed about Site activities.**

By consistently distributing accurate information to the local media, EPA can minimize misinformation and speculation about site activities and health risks. EPA will issue news releases and provide written materials to local media. EPA will also invite media representatives to public meetings. The addresses and phone numbers of local media representatives are located in Appendix A of this CRP.

- **Conduct public meetings and public availability sessions.**

Public meetings will be held at a central location during evening hours so that interested parties are able to attend. Public availability sessions are held throughout the day so that interested parties can attend at their convenience. EPA representatives will be present at both public meetings and availability sessions, and written materials will be provided at these events as well.

Meetings have been held prior to completion of a draft feasibility study and prior to the initiation of remedial action. In addition, on May 3, 2000, EPA officials held a public availability session from 3:00-8:00 p.m. with residents and Upper Merion Township officials to update them on the status of the Site.

- **Place public notices in local publications.**

Public notices regarding the Crater Resources Site will be placed in *The Times-Herald* (daily newspaper) and *King of Prussia Courier* (weekly newspaper). The public notices will announce key Site developments, public meetings, public availability sessions, and the release of Site-related documents.

In addition, public notices have appeared in fact sheets developed by the EPA, in text messages on the Upper Merion Township's public access channel (Channel 22), and posted on its web site (www.umtownship.org). The web site announcement was linked to information about Crater Resources that has been posted on EPA's web site (www.epa.gov/reg3hwmd/super/crater/menu.htm).

- **Hold a public meeting and a public comment period following the release of the Proposed Remedial Action Plan (PRAP).**
EPA has scheduled a public meeting for June 27, 2000 to present the PRAP. This meeting will allow community members to ask questions about the PRAP and provide input on the recommended actions. EPA will provide a minimum thirty-day public comment period on the PRAP. That comment period is slated to begin on June 19, 2000. Interested parties will be given the opportunity to comment on the PRAP and cleanup alternatives in writing at the June 27th public meeting and until July 19th.
- **Prepare a Responsiveness Summary (RS).**
A RS is required as part of the Record of Decision (ROD) for all remedial sites. The summary is prepared after the public comment period and summarizes the public concerns raised during the comment period.
- **Promote information sources available through EPA.**
EPA provides various sources of information to assist community members in understanding the Superfund process and Site-related activities. EPA may be contacted directly by phone, mail, or e-mail. Information may also be accessed through the EPA web site (www.epa.gov/reg3hwmd/super/crater/menu.htm). Contact information is included in all fact sheets that are distributed to community members. Additionally, local repositories have been established by EPA to collect site-related information for the public to view. See Appendices A & B for addresses and phone numbers of EPA representatives and information repositories. A Technical Assistance Grant (TAG) has also been made available to assist community groups in reviewing and understanding technical data collected at the Site. Information on the TAG is located in Appendix D of this CRP.
- **Revise Community Relations Plan as needed.**
Community concerns may change as a result of the selection of a remedial alternative. The CRP should therefore reflect these changing concerns. The CRP will be revised as different phases of the Superfund process at the Site are completed.

TABLE 2

Timing of Community Involvement Activities

<u>Activity</u>	<u>Timing</u>
<ul style="list-style-type: none"> • Designate a Community Involvement Coordinator (CIC) to handle Site inquiries. 	<p>Bill Hudson has been named the CIC for this Site.</p>
<ul style="list-style-type: none"> • Prepare and distribute fact sheets to residents and interested parties. 	<p>EPA will prepare fact sheets as new information arises and to announce Site-related events.</p>
<ul style="list-style-type: none"> • Maintain information repositories in the local area. 	<p>EPA will maintain and update repositories as new information is released.</p>
<ul style="list-style-type: none"> • Keep local officials of Upper Merion Township and Montgomery County well informed about Site activities. 	<p>EPA will contact officials on a regular basis.</p>
<ul style="list-style-type: none"> • Keep local media well informed about Site activities. 	<p>EPA will notify media of meetings and Site-related events.</p>
<ul style="list-style-type: none"> • Conduct public meetings and public availability sessions. 	<p>EPA will hold meetings and public availability sessions at various stages of the Superfund process and as requested by community members.</p>
<ul style="list-style-type: none"> • Place public notices in local publications. 	<p>Notices will be placed to announce public meetings and the release of Site-related documents.</p>
<ul style="list-style-type: none"> • Hold public meeting and public comment period regarding PRAP. 	<p>EPA will hold meeting and comment period following the release of the PRAP.</p>
<ul style="list-style-type: none"> • Prepare a Responsiveness Summary (RS). 	<p>EPA will prepare RS following the comment period.</p>
<ul style="list-style-type: none"> • Promote information sources available through EPA. 	<p>EPA will promote information sources throughout the Superfund process.</p>
<ul style="list-style-type: none"> • Revise Community Relations Plan. 	<p>EPA will revise CRP at various phases of the Superfund process and as needed.</p>

APPENDIX 1 List of Contacts

A.1 Federal Elected Officials

Rick Santorum
U.S. Senator
Widener Building - 960
1 South Penn Square
Philadelphia, PA 19107
(215) 864-6910

120 Russell Senate Office Building
Washington, DC 20510
(202) 224-6324
(202) 228-0604 fax

Arlen Specter
U.S. Senator
William Green Federal Building
Room 9400
600 Arch Street
Philadelphia, PA 19106
(215) 597-7200

303 Hart Senate Office Building
Washington, DC 20514
(202) 224-4254
(202) 228-1229 fax

Joseph M. Hoeffel III
U.S. Representative
1768 Markley Street
Norristown, PA 19401
(610) 272-8400

1229 Longworth House Office Building
Washington DC, 20515
(202) 225-6111
(202) 226-0611 fax

A.2 State Elected Officials

Richard A. Tilghman
Pennsylvania State Senator
406 Gatcombe Lane
Bryn Mawr, PA 19010
(610) 525-7674

Senate Box 203017
Harrisburg, PA 17120-3017
(717) 787-5544

Connie Williams
Pennsylvania State Representative
601 South Henderson Road
Suite 201
King of Prussia, PA 19406
(610) 992-9790
(610) 768-3104 fax

House Box 202020
Harrisburg, PA 17120-2020
(717) 787-7529

A.3 Local Officials

Upper Merion Township Building
175 West Valley Forge Road
King of Prussia, PA 19406
(610) 265-2600

Township Manager – Ron Wagenman
Public Information Officer – Ed Higgins
Assistant Public Information Officer – Eileen Rodrique
Township Planner – Robert Leoper

Upper Merion Township Board of Supervisors

Fiorindo A. Vagnozzi – Chairperson
Dan Rooney – Vice Chairperson
Anthony J. Volpi
Barbara S. Frailey
Ralph P. Volpe

Upper Merion Township Environmental Advisory Council

Joseph N. Bartlett, Jr. – Chairperson
Kurt E. Clawson – Vice Chairperson
Connie Zuehl – Secretary
Vivian B. Pelkin
Lewis Luchie, Jr.
Sal Sonsino

Montgomery County Commissioners

Michael D. Marino – Chairman
James R. Matthews – Vice Chairman
Ruth S. Damsker

Swede and Airy Streets
Montgomery County Courthouse
P.O. Box 311
Norristown, PA 19404
(610) 278-3020

A.4 U.S. EPA Region III Officials

Bill Hudson
Community Involvement Coordinator
U.S. EPA Region III
1650 Arch Street – 3HS43
Philadelphia, PA 19103
(215) 814-5532
hudson.willieam@epamail.epa.gov

Andrea Lord
Remedial Project Manager
U.S. EPA Region III
1650 Arch Street – 3HS21
Philadelphia, PA 19103
(215) 814-5053
lord.andrea@epamail.epa.gov

Superfund Hotline: 1-800-424-9346

A.5 Pennsylvania Department of Environmental Protection

Pennsylvania Department of Environmental Protection
Southeast Regional Office
Lee Park, Suite 6010
555 North Lane
Conshohocken, PA 194028
(610) 832-6000

A.6 Media

Newspapers:

The Times Herald
410 Markley Street
P.O. Box 591
Norristown, PA 19404
(610) 272-3820
(610) 272-9515 fax

King of Prussia Courier
134 North Wayne Avenue
Wayne, PA 19087
(610) 688-3000
(610) 254-8522 fax

The Philadelphia Inquirer
Montgomery County Neighbors Section
400 North Broad Street
Philadelphia, PA 19131
(215) 854-5454
(215) 854-4788 fax

Radio Stations:

KYW
Independence Mall East
Philadelphia, PA 19106
(215) 238-4700
(215) 238-4545 fax

WHYY
150 North 6th Street
Philadelphia, PA 19106
(215) 351-9200
(215) 351-0398 fax

WWDB
166 East Levering Mill Road
Bala Cynwyd, PA 19001
(215) 668-4400
(215) 668-4468 fax

Television Stations:

WCAU-TV 10 (NBC)
City Line Avenue and Monument Road
Philadelphia, PA 19131
(215) 668-5700
(215) 668-5533 fax

WPVI-TV 6 (ABC)
4100 City Line Avenue
Philadelphia, PA 19131
(215) 878-9800
(215) 878-4657 fax

KYW-TV 3 (CBS)
Independence Mall East
Philadelphia, PA 19106
(215) 238-4991
(215) 238-4657

WTXF-TV 29 (FOX)
330 Market Street
Philadelphia, PA 19106
(215) 925-2929
(215) 592-1535 fax

Suburban Cable
251 West DeKalb Pike
Suite EG2
King of Prussia, PA 19406
(610) 265-4233
(610) 265-2376 fax
(Upper Merion Township's cable channel is 22.)

A.7 Other Interested Parties

Gulph Mills Golf Club
300 Swedeland Road
King of Prussia, PA 19406
(610) 828-9370

APPENDIX B Information Repositories & Meeting Location

B.1 Information Repositories

Upper Merion Township
Wolfsohn Library
175 West Valley Forge Road
King of Prussia, PA 19406
(610) 265-4805

Hours: Monday – Thursday 9:00 am to 9:00 pm
Friday – 9:00 am to 5:00 pm
Saturday – 10:00 am to 5:00 pm (July & August, 10:00 am to 2:00 pm)
Sunday – 1:00 pm to 4:30 pm (July & August, closed)

U.S. EPA Region III
Administrative Records Room
1650 Arch Street
Philadelphia, PA 19103
(215) 814-3157 by appointment

B.2 Public Meeting Location

Upper Merion Township Building
175 West Valley Forge Road
King of Prussia, PA 19406
(610) 265-2600

*Name of meeting room is announced in public notice prior to the meeting.

APPENDIX C

Glossary of Technical Terms

Administrative Record File: The official file containing the Remedial Investigation report, Risk Assessment, Feasibility Study, and all other documents that provide the basis for EPA's selection of a remedial cleanup alternative at a Superfund site.

Ammonia: A colorless gas used primarily as a fertilizer as well as to manufacture nitric acid, alkalis, synthetic fibers, and plastics. It is also found in the waste product of the coking process.

Benzene: A clear, colorless, aromatic and highly flammable liquid. It is used in making plastics, rubber, resins, and synthetic fabrics such as nylon and polyester. Other uses include as a solvent in printing, paints, and dry cleaning.

Cleanup: An action taken to deal with a release or threatened release of hazardous substances that could adversely affect public health and/or the environment. The word cleanup is used to refer to both short-term removal actions and long-term remedial response actions at Superfund sites.

Coking: An industrial process which converts coal into coke, one of the basic materials used in blast furnaces for the conversion of iron ore into iron.

Community Involvement Coordinator (CIC): An individual EPA assigns to work closely with technical staff to keep the local community informed about and involved in a site cleanup.

Community Relations Plan (CRP): A document that assesses a community's concerns about a site, recommends activities that EPA may conduct to address these concerns, and suggests means to foster communication between EPA and the community.

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA): A Federal law (commonly known as "Superfund") passed in 1980 and modified in 1986 by the Superfund Amendments and Reauthorization Act (SARA). The law gives EPA the authority to investigate sites where there is a suspected threat to public health or the environment caused by the release or potential release of hazardous substances. The law also created a special tax on the chemical and petroleum industries. Money collected under the tax is deposited into a trust fund to be used to clean up abandoned or uncontrolled waste sites. Under the law, EPA can pay for the site cleanup when the parties responsible for contamination cannot be located or are unwilling or unable to perform the cleanup. The EPA can also take legal action to force parties responsible for site contamination to clean up the site or pay back the Federal government for the cost of the cleanup.

Contaminant: Any physical, chemical, biological, or radiological substance or matter that has an adverse effect on air, water, or soil.

Cyanide: A carbon-nitrogen chemical unit, which may be combined with a variety of organic and inorganic components. The most commonly used form, hydrogen cyanide, is used mainly to make the compounds needed to create nylon and other synthetic fibers and resins.

Feasibility Study (FS): A study that examines information provided by the remedial investigation activities and evaluates possible cleanup methods that can be used to remove or reduce contamination at a site.

Groundwater: The supply of fresh water found beneath the earth's surface, in empty areas between rocks and soil particles. Groundwater is a major source of drinking water.

Hazard Ranking System (HRS): A measurement tool used to evaluate the risks to public health and the environment posed by a hazardous waste site. The HRS calculates a score based on the potential of a hazardous substance moving from the site through the air, water, or soil. EPA places sites with a HRS score of 28.50 or higher on the NPL.

Heavy Metals: Metallic elements with high atomic weights that can damage living things at low concentrations. (e.g. zinc, lead, arsenic)

Information Repository: A collection of documents about a specific Superfund site and the general Superfund process. EPA usually places the information repository in a public building that is conveniently located.

Naphthalene: A white crystalline solid with a distinctive mothball odor, most commonly used as a pest repellent, also contained in mothballs and household deodorizers. Sometimes referred to as "tar camphor".

National Oil and Hazardous Substances Pollution Contingency Plan (National Contingency Plan): The Federal regulation that guides the determination of the sites to be corrected under Superfund and the program to prevent or control spills.

National Priorities List (NPL): EPA's list of the nation's most serious hazardous waste sites identified for long-term cleanup under Superfund.

Organic Compound: Animal or plant produced substances containing mainly carbon, hydrogen, nitrogen, and oxygen.

Phenolic Compounds: Organic compounds that are byproducts of petroleum refining, tanning and textile, dye, and resin manufacturing.

Polycyclic Aromatic Hydrocarbons (PAHs): A type of hydrocarbon, such as benzene or toluene, with a specific type of ring structure. They are sometimes added to gasoline in order to increase octane.

Potentially Responsible Parties (PRPs): The companies or people responsible for the contamination at a site. Whenever possible, through administrative and legal actions, EPA requires these parties to clean up hazardous waste sites they have contaminated.

Proposed Remedial Action Plan (Proposed Plan or PRAP): A plan that discusses the Remedial Investigation and Feasibility Study and proposes various cleanup methods for a site. EPA highlights its preferred cleanup method in this plan.

Public Comment Period: A period during which the public can review and comment on various documents and EPA actions. For example, EPA holds a public comment period when it proposes to add sites to the NPL. EPA also holds a minimum 30-day public comment period to allow community members to review and comment on Proposed Plans.

Record of Decision (ROD): A formal document that discusses in detail the cleanup plan EPA has decided to implement at a site.

Remedial Action: The actual construction or implementation phase that follows the remedial design of the selected cleanup plan for a Superfund site.

Remedial Design: The engineering phase that follows the ROD. During this phase, technical drawings and specifications are developed for the remedial action at a site. It is similar to a blueprint or work plan.

Remedial Investigation (RI): A study in which EPA identifies the types and amounts of site contamination and determines the threat this contamination poses to human health and the environment.

Remedial Project Manager (RPM): The EPA or state official responsible for overseeing on-site remedial action.

Remedial Response: A long-term cleanup action that stops or greatly reduces a release or threatened release of hazardous substances that does, or potentially could, pose an immediate threat to public health and/or the environment.

Removal Action: An immediate, short-term cleanup action that addresses a release or threatened release of hazardous substances that does, or potentially could, pose an immediate threat to public health and/or the environment.

Resource Conservation and Recovery Act (RCRA): A federal law that established a regulatory system to track hazardous substances from the time of generation to disposal. The law requires that safe and secure procedures be used in treating, transporting, storing, and disposing of hazardous substances. RCRA is intended to prevent the creation of new, uncontrolled hazardous waste sites.

Responsiveness Summary: A summary of oral and written comments that EPA receives during the public comment period and EPA's responses to those comments. The Responsiveness Survey is part of the ROD.

Risk Assessment: A study, normally conducted during the Remedial Investigation that evaluates and describes the risks to human health and the environment posed by site contamination. The risk assessment uses statistical models and mathematical calculations.

Sediment: Soil, sand and minerals washed from land into water, usually after rain.

Superfund: A fund that can be used to finance cleanup actions at hazardous waste sites. The fund was established under the legislative authority of CERCLA with funds received largely from a tax levied on the chemical and petroleum industries. Fund moneys can be used by EPA to respond directly to releases or threatened releases of hazardous substances that may endanger public health, welfare, or the environment. The term "Superfund" also may refer to the EPA programs which conduct cleanups using these fund moneys.

Superfund Amendments and Reauthorization Act (SARA): Modifications to CERCLA enacted on October 17, 1986.

Surface Water: Bodies of water on the Earth's surface, including lakes, ponds, creeks, and oceans, as opposed to groundwater which exists below the Earth's surface.

Technical Assistance Grant (TAG): An EPA grant of up to \$50,000, which can be awarded to a bona fide citizens group in a Superfund site area. The grant enables that group to hire a technical expert to review and interpret site reports issued by EPA or other parties.

Toluene: Organic liquid with a sweet odor primarily used to make benzene.

Volatile Organic Compounds (VOCs): Carbon based chemicals commonly used as industrial solvents, degreasers, and fumigants.

APPENDIX D

Technical Assistance Grant (TAG)

EPA provides Technical Assistance Grants (TAGs) of up to \$50,000 as part of its Superfund community relations program. The TAG program enables citizens in a site area to hire a technical expert to review and interpret site reports generated by EPA or other parties. For additional information on how to apply for a Technical Assistance Grant, contact:

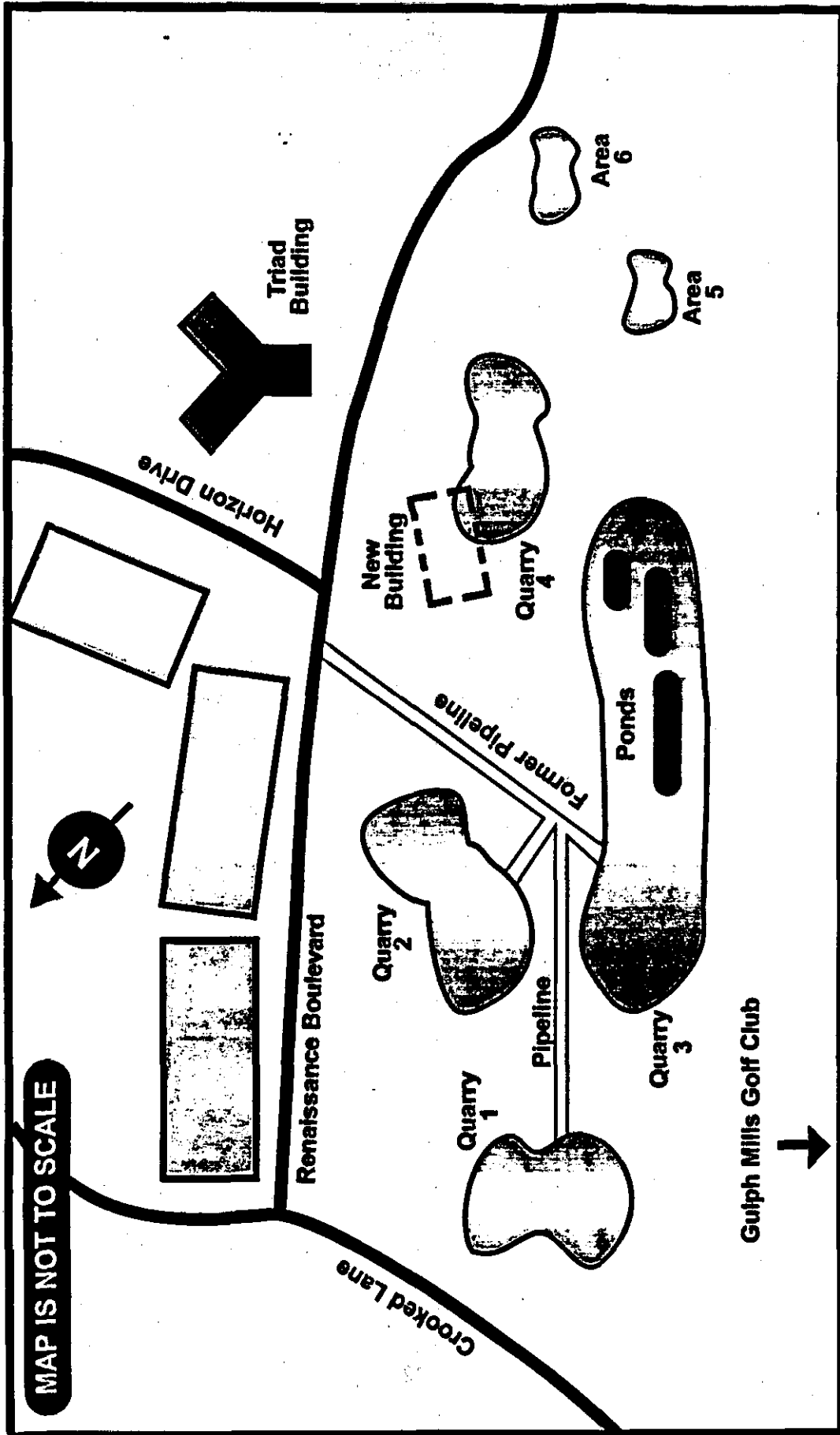
Bill Hudson (3HS43)
Community Involvement Coordinator
U.S. EPA – Region 3
1650 Arch Street
Philadelphia, PA 19103
215-814-5532
HUDSON.WILLIAM@EPAMAIL.EPA.GOV

EPA accepts applications for TAGs as mandated by the Comprehensive Environmental Response, Compensation, and Liability Act, as amended by the Superfund Amendments and Reauthorization Act. Only one group per site can receive a TAG, so EPA urges local groups to join together to apply. The following are federal publications on the TAG program, which can be obtained by calling EPA's publications number: 1-800-490-9198

- Superfund Technical Assistance Grant (TAG) Brochure
Order No. EPA540K93002
- Superfund Technical Assistance Grant (TAG) Handbook: Applying For Your Grant
Order No. EPA540K93003
- Superfund Technical Assistance Grant (TAG) Handbook: Application Forms With Instructions
Order No. EPA540K93004

ATTACHMENT 1
Site Map

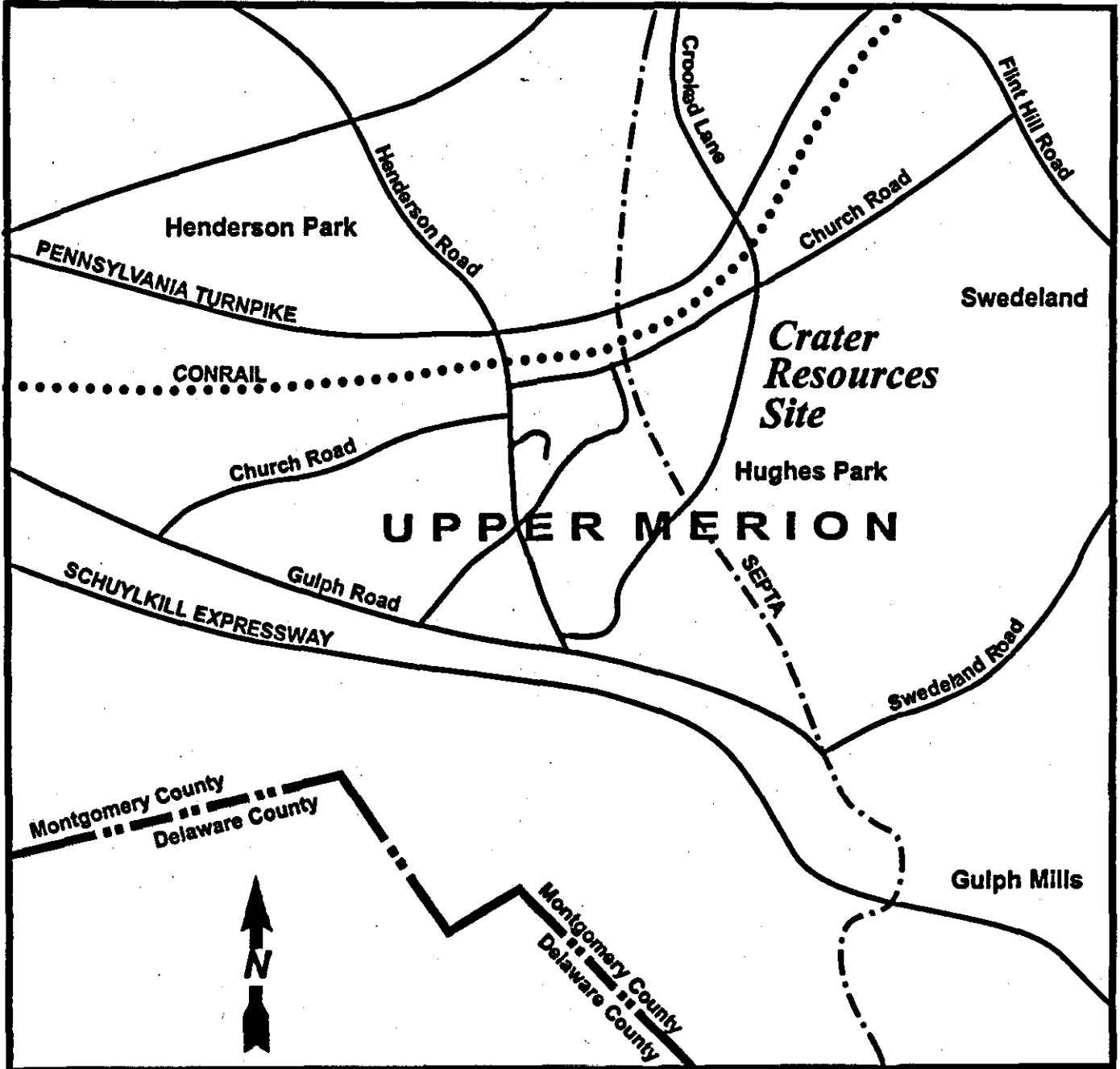
Crater Resources, Inc., Superfund Site



ATTACHMENT 2
Site Location Map

Site Location Map

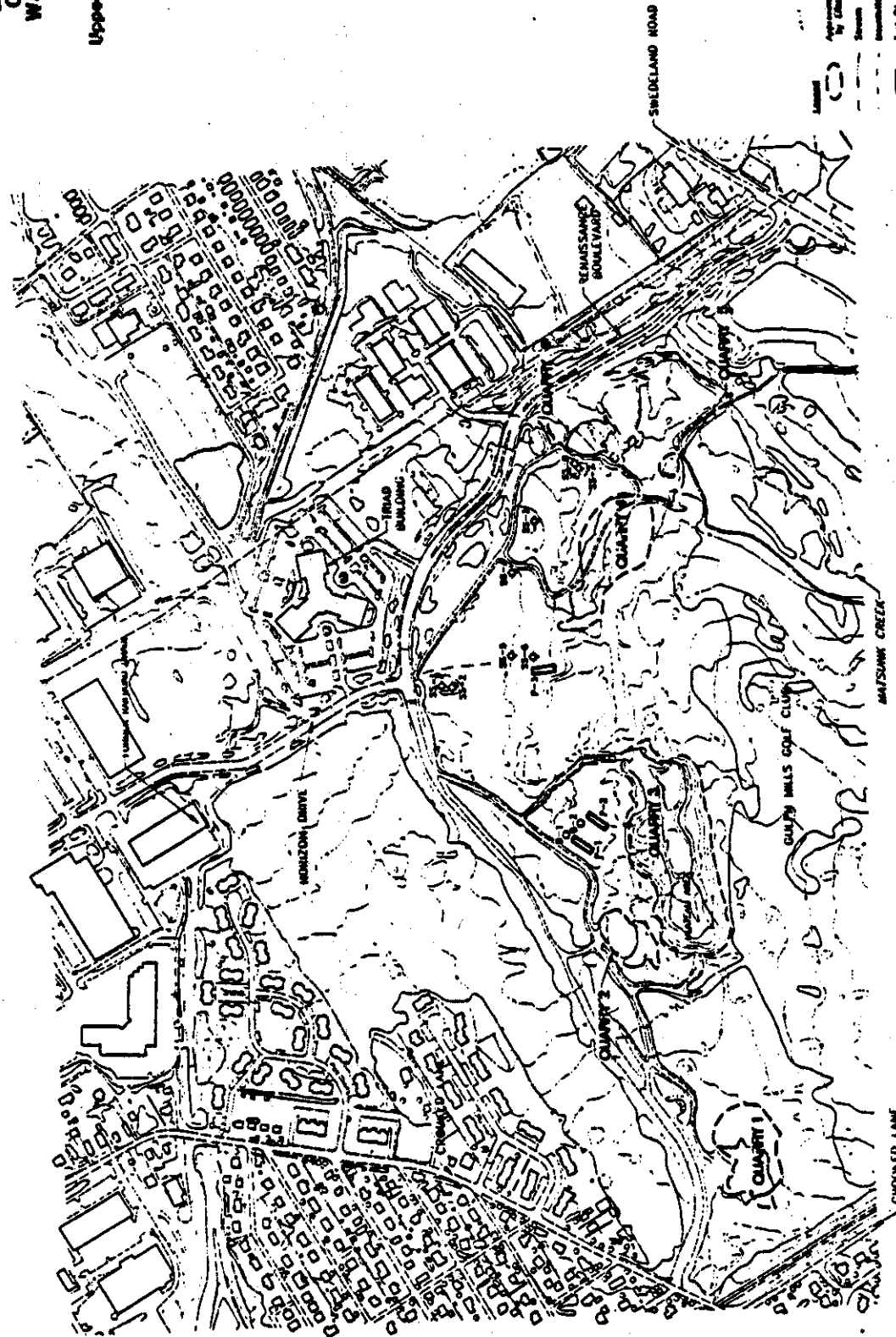
Crater Resources, Inc.



AR500200

ATTACHMENT 3
Soil Sample Locations

Figure 2
Locations of Samples
Collected in 1989 by
Walter B. Satterthwaite
Associates, Inc.
Crater Resources Site
Upper Merion Twp., Pennsylvania



Note: The Locations of Quaries 8 and 9 are Modified and Relocated in Satterthwaite 1982

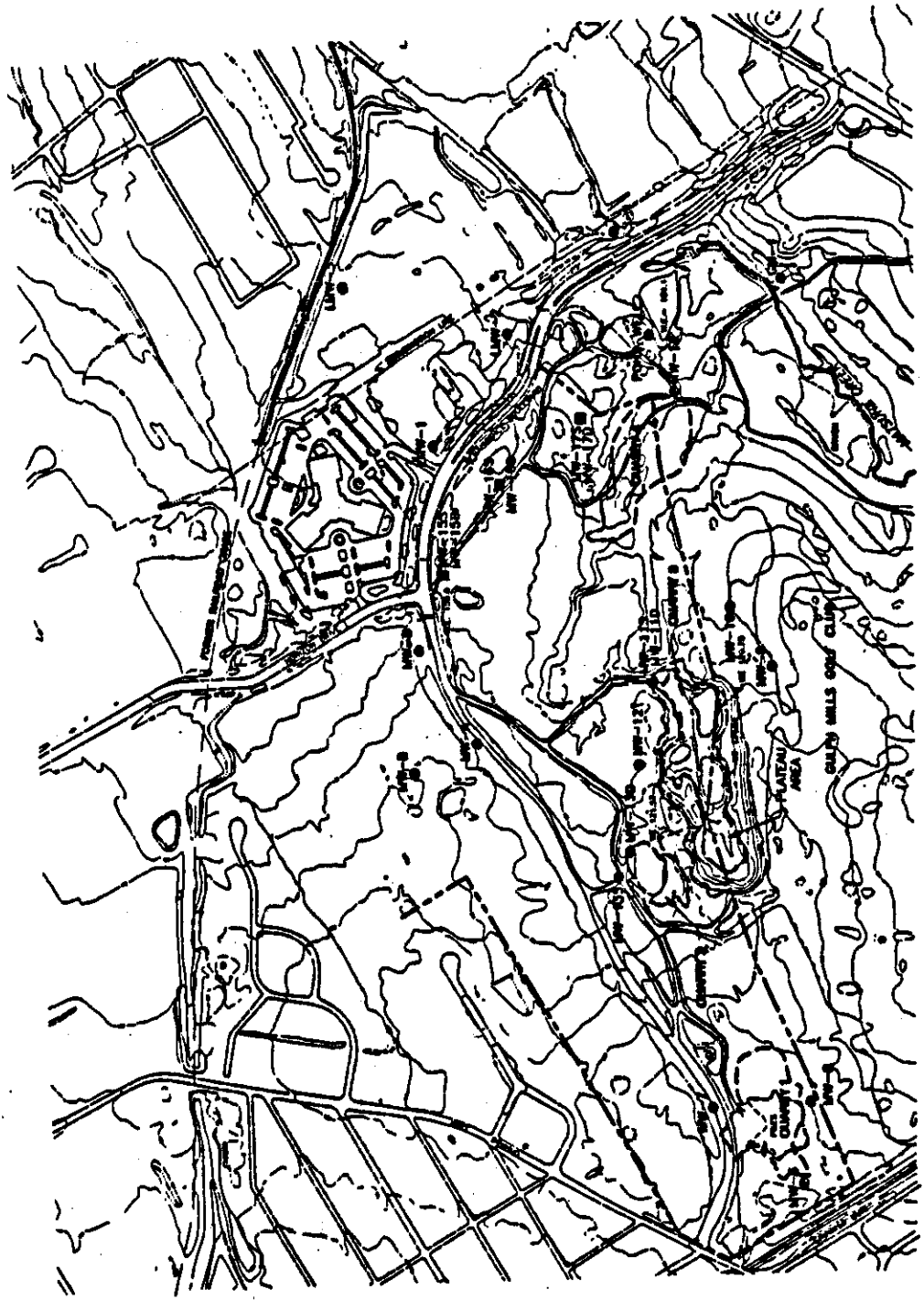


AR301548

AR500202

ATTACHMENT 4
Monitoring Well Locations

Figure 12
Well Location Map
Crater Resource Site
Upper Merion Twp., Pennsylvania



ATTACHMENT 5
Public Notice – PRAP Meeting Announcement



**The U.S. Environmental Protection Agency
Announces Public Meeting on Proposed Plan
for the**



**Crater Resources Superfund Site
- 30 Day Public Comment Period Begins June 16 -**

On June 27, 2000, U.S. Environmental Protection Agency (EPA) representatives will hold a public meeting to present the Proposed Plan to address contamination at the Crater Resources (Keystone Coke/Alan Wood Steel) Site in Upper Merion Township, Montgomery County, Pennsylvania.

**Come Meet With EPA Officials
Tuesday, June 27, 2000
From 7-9 p.m. in the Valley Forge Room
Upper Merion Township Building
175 W. Valley Forge Road
King of Prussia, PA 19406
610-265-2600**

The Proposed Plan identifies several possible clean-up actions and highlights EPA's recommended remedy to address contamination in soils and sediment in Quarries 1, 2, 3 and 4. Cleanup activities will focus mainly on addressing the affected groundwater and contaminated soil.

Copies of the Proposed Plan and the Site file are available in the information repositories at:

Upper Merion Township Library
175 W. Valley Forge Road
King of Prussia, PA 19406
Phone: (610) 265-2600
Hours: M-Th 9 am - 9 pm
Fri 9 am - 5 pm
Sat 10 am - 5 pm
Sun 1 pm - 4:30 pm

U.S. EPA Region III
Administrative Record Center
1650 Arch Street
Philadelphia, PA 19103
(215) 814-3157
Call for appointment

General information on the Crater Site is available on the EPA's web site at:
<http://epa.gov/reg3hwmd/super/crater/menu.htm>

EPA encourages the community to review and comment on EPA's Proposed Plan and to attend the June 27th public meeting. Interested parties may submit their comments and questions to EPA during the 30-day public comment period. EPA will review all comments before selecting a final clean-up method. Comments can be presented at the public meeting or mailed (postmarked by end of comment period) to the EPA contacts listed below:

William Hudson
Community Involvement Coordinator
U.S. EPA - Region III
1650 Arch Street (3HS43)
Philadelphia, PA 19103
Phone: (215) 814-5532
hudson.william@epa.gov

Andrea M. Lord
Remedial Project Manager
U.S. EPA Region III
1650 Arch Street (3HS21)
Philadelphia, PA 19103
Phone: (215) 814-5053

AR500206

ATTACHMENT 6
Public Notice – Public Comment Period Extension



**The U. S. Environmental Protection Agency
Announces the Proposed Plan for the
Crater Resources Superfund Site**

**30 Day Public Comment Period
Which Began June 16
Has Been Extended Until August 15**

The Proposed Plan identifies several possible cleanup actions and highlights the EPA's recommended remedy to address contamination in soils and sediments in Quarries 1, 2, 3, and 4. Cleanup activities will focus mainly on addressing the affected groundwater and contaminated soil.

Copies of the Proposed Plan and the Site file are available in the information repositories at:

Upper Merion Township Library
175 W. Valley Forge Road
King of Prussia, PA 19406
Phone: (610) 265-2600
Hours: M-Th 9 am - 9 pm
Fri 9 am - 5 pm
Sat 10 am - 5 pm
Sun 1 pm - 4:30 pm

U. S. EPA Region III
Administration Record Center
1650 Arch Street
Philadelphia, PA 19103
(215) 814-3157
Call for appointment

General information on the Crater Site is available on the EPA's web site at:
<http://www.epa.gov/reg3hwmd/super/crater/menu.htm>

EPA encourages the community to review and comment of the Proposed Plan. Interested parties may submit their comments and questions to EPA during the public comment period. EPA will review all comments before selecting a final cleanup method. Comments can be emailed or mailed (postmarked by end of comment period) to the EPA contacts listed below:

William Hudson
Community Involvement Coordinator
U. S. EPA - Region III
1650 Arch Street
Philadelphia, PA 19103
Phone: (215) 814-5532
HUDSON.WILLIAM@EPAMAIL.EPA.GOV

Joseph McDowell
Remedial Project Manager
U. S. EPA - Region III
1650 Arch Street
Philadelphia, PA 19103
Phone: (215) 814-3192
MCDOWELL.JOSEPH@EPAMAIL.EPA.GOV



ATTACHMENT 7
April 2000 Fact Sheet



Crater Resources Inc. Superfund Site (Keystone Coke Co./Alan Wood Steel Co.)



U.S. Environmental Protection Agency, Region III • Information Update • April, 2000

EPA ADDRESSES COMMUNITY CONCERNS Public Availability Session Scheduled

ANNOUNCEMENT OF SECOND PUBLIC AVAILABILITY SESSION

A Public Availability Session will be held at the Upper Merion Township Building on Wednesday, May 3, 2000. Area residents are encouraged to attend between 3 - 5 p.m. or 6 - 8 p.m. At this session, members of the public will be able to pose questions to EPA's Project Manager.

EPA is currently in the process of listing and evaluating cleanup alternatives in a Feasibility Study for the Crater Site. EPA expects to finalize the Feasibility Study in May 2000, with a Proposed Plan presenting the preferred alternative to the public soon thereafter.

SITE HISTORY

The Crater Resources, Inc./Keystone Coke Co./Alan Wood Steel Co. Site consists of four inactive quarries on a 50-acre parcel of land. Beginning in 1919, the Alan Wood Steel Company disposed of wastes generated by its coking facility in Swedeland, Pennsylvania, into Quarries 1, 2, and 3. In 1977, Alan Wood Steel declared bankruptcy and transferred ownership of the property to Keystone Coke Company, a subsidiary of Alabama By-Products Corporation. Keystone Coke Co. continued to dispose of wastes in Quarry 3 until 1980. In 1979, Haploid Corporation purchased part of the property and later transferred a portion of Quarry 3 to Crater Resources, Inc. and other portions to Swedeland Road Corporation. Swedeland has since transferred its land holdings to several other parties.

Most of the environmental work taking place at the Site is being funded by a group of potentially responsible parties (PRPs). Under the Superfund law, PRPs are expected to conduct or pay for site cleanup. The PRP Group members are Beazer East, Inc., Keystone Coke Company, Inc. and Vesper Corporation.

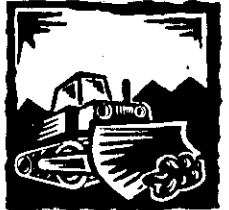
The U.S. Environmental Protection Agency (EPA) placed the Crater Resources Site on its Superfund list for cleanup in 1992. This is the EPA's third fact sheet that was developed to update residents about the site. In addition, a Public Availability Session was held in August, 1999 to answer residents questions and concerns.

HEALTH RISKS

EPA completed a human health risk assessment in December, 1999. This assessment showed risks to human health from the long term ingestion of or contact with contaminated groundwater and soils in the quarries. EPA believes that all surrounding residents and businesses are supplied with drinking water through a municipal water line, so there is little chance of contact with the contaminated groundwater. Complete contaminant descriptions are available on the Internet at <http://www.epa.gov/reg3hwmd/super/crater/menu.htm>. These documents are also available at the Upper Merion Township Library.

CONSTRUCTION NEAR QUARRIES

There has been public concern about construction which has occurred near Quarry 4 and is proposed between Quarries 1 and 2. This construction is not related to the EPA cleanup, but is being done by private developers. EPA does not believe that the underlying contaminated soil and groundwater are being disturbed. An underground pipe was unearthed during construction near Quarry 4, and the construction company properly and immediately notified the EPA. A contractor hired by the Property Owner is in the process of removing the contaminated underground piping and associated soils.



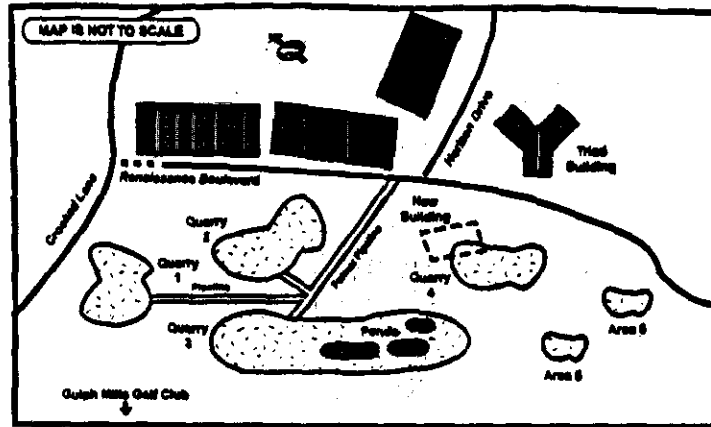
CONTAMINANTS

Contamination has been found in soils and sediment in Quarries 1, 2, 3 and 4 as well as in Area 6, and in the groundwater both on and off-site. EPA did not detect a risk from exposure to the air. Construction at the Site is not believed to be disturbing underlying soil or groundwater.

Soils and sediments at the bottom of Quarry 3 and in the soils of Quarries 1, 2, and 4 contain organics such as phenolic compounds, and polycyclic aromatic hydrocarbons (PAHs); volatile organic compounds (VOCs) such as benzene and toluene. Cyanide and heavy metals are also present. Similar contamination has been detected in groundwater beneath and downgradient from the Site.

AR500210

SITE MAP



The Crater Resources Site is bordered on the south by the Gulph Mills Golf Course and on the east and northeast by Renaissance Boulevard. The western portion of the Site is adjacent to where Crooked Lane intersects with the SEPTA railroad tracks. Residents in Hughes Park, along Crooked Lane, and in the western portion of Swedeland are nearest to the Site.

CLEANUP PROCESS

Cleanup activities will focus mainly on addressing the affected groundwater and contaminated soil.

EPA Region III will present a proposed remedy for the Site to the public in the Spring of 2000. Following a public meeting this summer, EPA will issue a Record of Decision (ROD) describing the chosen remedy for the Site. EPA Community Involvement Coordinators have been surveying residents to document community concerns. Those concerns, along with a community relations plan, will be included in the Administrative Record.

HISTORY OF SUPERFUND

Superfund cleanups are very complex and require the efforts of many experts in science, engineering, public health, management, law, community relations, and numerous other fields. Congress established the Superfund Program in 1980 to clean up the Nation's most serious sites. The Superfund Program is managed by the EPA in cooperation with individual states and tribal governments. Superfund locates, investigates and cleans up hazardous waste sites.

FOR FURTHER INFORMATION

Information on the Superfund Program, EPA, or the Crater Resources Site can be found on the EPA's Web site at:

<http://www.epa.gov/reg3hwmd/super/crater/menu.htm>
In addition, the EPA has developed an Administrative Record for the Crater Resources Site. The administrative Record contains all relevant documents leading up to the Record of Decision and can be viewed at:

US EPA Region III
Administrative Records
Room
1650 Arch Street
Philadelphia, PA 19103
Call 215-814-3157 for an
appointment

Upper Merion Township
Building
175 W. Valley Forge Road
King of Prussia, PA 19406
610-265-2600
Hours: M-Th 9 am - 9 pm
Fri. 9 am - 5 pm
Sat. 10 am - 5 pm
Sun. 1 pm - 4:30 pm

Interested parties may also contact:

Andrea Lord
Remedial Project Manager
1650 Arch St - 3HS21
Philadelphia, PA 19103
(215) 814-5053
lord.andrea@epamail.epa.gov

Bill Hudson
Community Involvement
Coordinator
1650 Arch St - 3HS43
Philadelphia, PA 19103
(215) 814-5532
hudson.william@epamail.epa.gov
EPA ID# PAD980419097

STATUS OF CLEANUP AT AREA SUPERFUND SITE Look Inside for the Latest Update.



U.S. Environmental Protection Agency
William Hudson 3HS43
1650 Arch Street
Philadelphia, PA 19103-2029

AR500211

ATTACHMENT 8
June 2000 PRAP Fact Sheet



Crater Resources Inc./Keystone Coke Co./Alan Wood Steel Co. Site



Upper Merion Township
Montgomery County, Pennsylvania

U.S. Environmental Protection Agency, Region III Information Update June, 2000

EPA ANNOUNCES PUBLIC MEETING ON PROPOSED PLAN

The United States Environmental Protection Agency Region III (EPA) will hold a public meeting to announce a Proposed Plan to identify its preferred alternative to address contamination in groundwater, soils, and sediment at the Crater Resources Inc./Keystone Coke Co./Alan Wood Steel Co. Superfund Site (referred to as "Crater Resources" or "Site") located in Upper Merion Township, Montgomery County, Pennsylvania.

Public meeting will be held on:
Tuesday, June 27, 2000
7-9 p.m. in the Valley Forge Room
Upper Merion Township Building
175 W. Valley Forge Road
King of Prussia, PA 19406
610-265-2600

At this meeting, EPA will present the Proposed Plan and supporting information, answer questions, and accept both oral and written comments from the public. EPA will summarize and respond to comments received at the public meeting and written comments in the Responsiveness Summary section of the Record of Decision, which documents EPA's final selection for cleanup at the Site.

The Role of the Community in the Selection Process

This Proposed Plan is being distributed to solicit public comment on the appropriate cleanup action for the Site. EPA relies on public input so the remedy selected for each Superfund Site meets the needs and concerns of the local community. EPA is providing a 30-day public comment period beginning on June 16, 2000 to encourage public participation in the selection process. Written comments, postmarked within comment period, should be sent to:

Andree Lord (3HS21)
Remedial Project Manager
U.S. Environmental Protection Agency
1650 Arch Street
Philadelphia, PA 19103
Phone: (215) 814-5053

EPA's PREFERRED ALTERNATIVE

EPA's Preferred Alternative includes removal of all affected soils and sediments in Quarry 3, construction of a multi-layer cap to prevent filtration of surface water into the contaminated soils of Quarries 1, 2, and 4 and other affected soil areas, monitored natural attenuation of the groundwater, and further investigation of the former waste ammonia liquor pipeline that was located between the Alan Wood Steel facility and the Crater Resources Site.

Documents supporting EPA's proposed remedy are in the Administrative Record for the Site. The Administrative Record includes the Remedial Investigation (RI), the Human Health Risk Assessment (HHRA), and the Feasibility Study (FS). The Administrative Record is at the following locations:

Upper Merion Township Library
175 W. Valley Forge Road
King of Prussia, PA 19406
(610) 265-2600

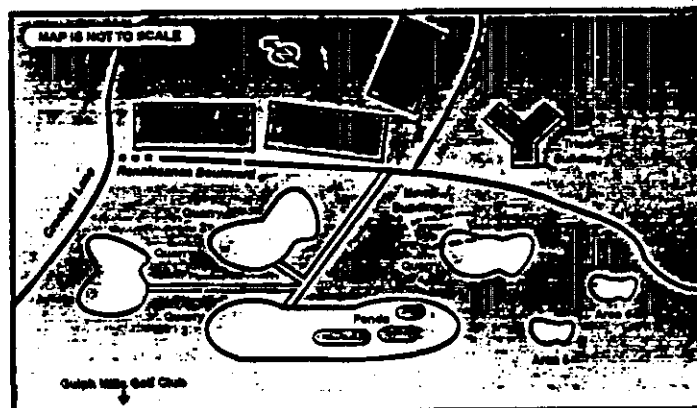
Administrative Record Center
U.S. EPA - Region III
1650 Arch Street
Philadelphia, PA 19103
(215) 814-3157
Call for appointment

Some general background on the Site can be obtained from EPA's web site at:

<http://www.epa.gov/region3/hwmd/super/crater/menu.htm>

Interested persons are encouraged to submit their comments on the Proposed Plan and the other documents in the Administrative Record to EPA during the public comment period. Although EPA has selected a preferred alternative, no final decision has been made. EPA may modify the preferred alternative, select another response action, or develop another alternative if public comment or new information presented warrants such an action. EPA, in consultation with the PADEP, will make its final selection of a remedy for the cleanup of the contamination at the Site in a Record of Decision (ROD).

SITE MAP



The Crater Resources Site is bordered on the south by the Gulph Mills Golf Course and on the east and northeast by Renaissance Boulevard. The western portion of the Site is adjacent to where Crooked Lane intersects with the SEPTA railroad tracks. Residents in Hughes Park, along Crooked Lane, and in the western portion of Swedeland are nearest to the Site.

AR500213

SCOPE AND ROLE OF RESPONSE ACTIONS

The Site covers 50 acres of partially developed land located approximately one mile south of the King of Prussia section of Upper Merion Township, Montgomery County, Pennsylvania. Portions of the Site are currently being developed by private entities. The Site consists of several subdivided parcels, now owned individually by Crater Resources, Inc., Each Parcel As Is, Inc., Out Parcel, Inc., RT Option, Inc., Liberty Property Trust, Inc., and the Gulph Mills Golf Club (Golf Course). Four former quarries (Quarries 1, 2, 3, and 4) are located on the Site and cover approximately 14 acres. In addition, 2 small areas, known as Areas 5 and 6 are on the property. Portions of the former pipeline that carried the waste ammonia liquor (WAL) from the former Alan Wood Steel facility are also in existence. Contamination has been found in the soil, groundwater and sediment in and surrounding Quarries 1, 2, 3, and 4 and Areas 5 and 6. In addition, contamination has been found in the soils along the route of the former WAL pipeline.

The primary objective of the proposed remedy is to reduce or eliminate the potential for human or ecological exposure to contaminated soil, sediment, and groundwater at the Site. EPA believes the preferred cleanup alternative outlined in this Proposed Plan will comprehensively address any threat posed by the release of hazardous substances at or from the Site.

SITE BACKGROUND

The Alan Wood Steel Company and its successors (Alan Wood) operated a coke and coke byproduct manufacturing facility in nearby Swedeland, Pennsylvania from 1918 until 1977. The facility was located on the west side of the Schuylkill River, approximately one mile northeast of the Site. After Alan Wood declared bankruptcy in 1977, the facility and property were first leased and subsequently sold to the Keystone Coke Company (Keystone Coke). Keystone Coke operated the facility from 1978 until 1981, when all operations at the facility ceased.

Waste ammonia liquor (WAL) was a liquid waste generated during the coke byproduct recovery process, and contained light oils, tars containing phenolic compounds, naphthalene, ammonia, and wastewater. WAL was pumped via pipeline from the Alan Wood facility to Quarries 1, 2, and 3, and remnants of the pipeline are still visible near the western edge of Quarry 3.

HISTORY OF EPA INVOLVEMENT

EPA placed the Site on its Superfund list for cleanup in 1992. This is EPA's fourth public fact sheet and will be the third public meeting held to update residents about the site.

Most of the environmental work taking place at the Site is being funded by a group of potentially responsible parties. Under the Superfund law, PRPs are expected to conduct or pay for site cleanup. The PRP group members are Beazer East, Inc., Keystone Coke Company, Inc., and Vesper Corporation.

Following the June 27th public meeting and comment period, EPA will issue a Record of Decision (ROD) describing the final chosen remedy for the site, along with a timeline.

CONSTRUCTION CONCERNS

There has been public concern about construction, which has occurred near Quarry 4 and is proposed between Quarries 1 and 2. This construction is not related to the EPA cleanup, but is being done by private developers. EPA does not believe the underlying contaminated soil and groundwater are being disturbed. An underground pipe was unearthed during construction near Quarry 4, and the construction company properly and immediately notified EPA. A contractor hired by the Property Owner has removed the contaminated underground piping and associated soils.



HEALTH RISK

EPA completed a human health risk assessment in December, 1999. This assessment showed risks to human health from the long term ingestion of or contact with contaminated groundwater and soils in the quarries. EPA believes that all surrounding residents and businesses are supplied with drinking water through a municipal water line, so there is little chance of contact with contaminated groundwater. Complete contaminant descriptions are available on the Internet at <http://www.epa.gov/reg3hwmd/super/crater/menu.htm>. These documents are also available at the Upper Merion Township Library.

To obtain additional information relating to this Proposed Plan, please contact either of the following EPA representatives:

William Hudson
Community Involvement
Coordinator
U.S. EPA - Region III
1650 Arch Street (3HS43)
Philadelphia, PA 19103
Phone: (215) 814-5532
HUDSON.WILLIAM@EPA.MAIL.EPA.GOV

Andres M. Lord
Remedial Project Manager
U.S. EPA - Region III
1650 Arch Street (3HS21)
Philadelphia, PA 19103
Phone: (215) 814-5053

STATUS OF CLEANUP AT AREA SUPERFUND SITE Look Inside for the Latest Update.



U.S. Environmental Protection Agency
William Hudson 3HS43
1650 Arch Street
Philadelphia, PA 19103-2029

AR500214