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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 CHESTNUT BUILDING
PHILADELPHIA, PENNSYLVANIA 19107

November 15, 1991

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Margaret Zak
Project Coordinator
Westinghouse Electric Corporation
1525 Westinghouse Building
Gateway Center
11 Stanwix Street
Pittsburgh, PA 15222

Re: Revised Phase II Remedial Investigation Review
Hunterstown Road Site

Dear Ms. Zak:

EPA has reviewed the revised Phase II RI for the Hunterstown Road Site and has found some of Westinghouse's responses to EPA's comments inadequate. EPA will not approve or conditionally approve the RI without further modifications and agreements to fill existing data gaps that could substantially affect the RI conclusions and/or FS cost estimates. EPA does not wish to delay the progress at the site and has attempted to narrow the differences between Westinghouse and EPA to changes that EPA considers absolutely essential to the investigation.

Air Dispersal of Lead

EPA asked Westinghouse to perform some limited soil sampling near a residential receptor for lead. Westinghouse declined to perform this sampling and EPA has therefore sampled near a residence along Hunterstown Road for lead.

Water Line Agreements

Westinghouse was unwilling to furnish information regarding legal agreements related to the water line installations or to identify which sections were financed by Westinghouse. EPA will not delay the RI completion for this issue, but may require Westinghouse to supply this information in the future.

RCRA Requested Soil Samples

EPA asked for additional soil samples from the area between the lagoon and the stressed vegetation area. This area is downhill topographically from the lagoon and could have been contaminated by runoff. Westinghouse responded that this could be defined during design as we determine the limits of the stressed vegetation and the lagoon areas. EPA agrees to defer this sampling until remedial design.

Figure 4-1

EPA's hydrogeologist asked Westinghouse to "close" the contaminant plumes around all of the hits. Westinghouse responded positively, but did not enclose all hits within the contours. EPA asks again that Westinghouse close the isopleths, but will not require this revision.

Residential Wells

EPA requested additional residential well sampling during the Phase II Work Plan negotiations. Westinghouse declined sampling and asserted that monitoring wells were more accurate and reliable for investigating the extent of the ground water contamination plume. At that time, I was aware that the public water line had been extended to supply potable water to resident near the site and I believed that they were using the public water. If the extent of the ground water contamination plumes developed during the phase II RI explained all of the residential well contamination shown in Figure 1-3, residential well sampling would contribute no new information. EPA asked that Westinghouse review the residential well data and compare the contamination with the extent of contamination determined during Phase II. This was done in the revised Phase II RI report and in general explained much of the past residential contamination. The discussion in 4.4.3 doesn't explain or comment on wells 44a and 44b that were contaminated and are in line with municipal well 5. The report indicates that wells 45a and 45 are probably due to the lagoon plume. The report has no explanation as to why wells 34,35 and 36 show contamination and HMW-15, the monitoring well between these wells and the waste area shows none. These residential well may have been contaminated by a ground water pathway that Westinghouse has not defined.

At the Westinghouse plant site we discovered that some people declined hookups to the water line and some residents that were connected still used well water in spite of warnings. The residential well survey was conducted by mail and about half of the residents did not respond. EPA has compared figure 2-11 to figure 1-3 and is concerned that some residents could be drinking contaminated well water. The RI report attributes the contamination in wells 45A (D. Waddels house) and 45 to contamination from the lagoon. Figure 2-11 doesn't show the lot associated with well 45 and I assume that this well wasn't surveyed. Residents owning wells 44a and 44b apparently weren't surveyed although

figure 1-3 shows that the well was contaminated at the time of the residential well sampling effort.

EPA understands that because of the results from well nest HMW-20, Westinghouse is testing a large number of homes near the intersection of Old Harrisburg Road. EPA approves of this voluntary effort to make sure that residents are not drinking contaminated well water. EPA is therefore puzzled that Westinghouse is taking such strong measures for the residents along Old Harrisburg Road and has made such a weak effort to determine the status of the wells at most risk as shown in figure 2-11. EPA asks that Westinghouse make additional efforts to determine whether the residents shown on fig 2-11 have been connected and to determine status of their well use. Additionally, EPA believes that wells 9 to 6 on figure 2-11 and wells 45, 44a and 44b should be tested to see if contamination is still migrating south along Hunterstown Road. If Westinghouse refuses to do this, it will be necessary for EPA to perform the survey and sampling.

Mandatory Changes for RI Approval

RCRA Requested Borings

EPA requires one boring near drum burial area one as shown in the attached figure. The soil and bedrock interface has been tested by borings around the perimeter of the unit. A major source of VOCs has not been discovered, yet a significant source must be present to produce the observed ground water contamination plume. This boring is to determine if a source of immiscible VOCs is present in the shallow zone bedding plane bedrock fractures that are in communication with drum burial area one. The boring will be to 10 feet below all of the stratigraphic units that subcrop in the burial area. Hollow core samples must be taken and checked for VOCs by reading with an HNU. If Hnu readings are positive the section of the core should be sampled and analyzed for VOC's.

Drum Burial Area 1 - Additional Wells

EPA has discussed the need for four additional wells to define the plume from drum burial area one. As we have discussed, the well nests in a line to the west of the site have all shown very high levels of contamination. All other wells were clean. The contamination levels in the line of wells did not show an uniform decreasing trend. The current data is not sufficient to define the extent of contamination. Westinghouse has cited the results of the pump test from an area across the road an indication that any reasonable pumping rate will capture contaminants from a capture zone wider than the clean wells an therefore, there is no need to define the plume. EPA's response is that capture zones should not be confused with the extent of well response. Westinghouse has performed no capture zone analysis to support their assertion. Additionally, the cross sections show

that the hydrogeology near drum burial area one changes substantially from that near the lagoon.

EPA's first well proposed was north of HMW-9A to help define the plume close to drum burial area one. EPA agreed to defer this requirement until design, after discussion with Westinghouse.

EPA's second requested well was located at well nest HMW-16 and is deeper that the other wells at this location and monitors the same zone as HMW-20BF which had the highest contamination found. EPA wanted to limit the extent of contamination with depth. Westinghouse stated that they expect that this well will show high contamination and that the depth of the plume should be defined during design since a decision on pump and treat can be made without this information. EPA agreed to defer until design.

EPA requested a two well nest along strike of HMW-16AW and 16BF between HMW-15 and HMW-20 (attached). This would give EPA a much better understanding of the width of the plume and increased confidence in the direction that the plume was traveling. This location will also increase confidence that the plume is not moving south toward municipal well #5. Westinghouse must install theses wells.

Regulatory Status of Waste in SV area

EPA requires a composite five samples of Stressed Vegetation Waste be analyzed using the TCLP for compounds regulated under the TC rule. This is needed to determine the status of the waste for offsite disposal or onsite treatment. This is needed to accurately assess alternatives for the FS and their corresponding ARARs.

Table 4-3

EPA again asks Westinghouse to add arithmetic means of the background metals and to clearly state on the table that the levels listed currently in the table are 95% confidence maximums. This can be done with a footnote on the table. The table is currently very misleading.

Issues Resolved

Middle Stream

EPA requested additional sampling of the middle stream sediments for phthalates. Westinghouse asserted that the elevated phthalates were due to leaching of plasticizers from the anti-erosion filter fabric that was installed in the upper section of the stream. EPA has reviewed data on plasticizers in plastics, the toxicology of the phthalates and has considered the fact that the stream is intermittent. EPA will not require the additional middle stream sampling for phthalates.

Antimony in Ground Water Split Samples

During the Remedial Investigation, EPA's oversight contractor split samples with Westinghouse at the Hunterstown Road Site. EPA was surprised to see levels of antimony above proposed MCLs. The level in the split samples was about 20 ppb and the proposed MCL is 5 to 10 ppb. I discussed this with EPA's Ground Water Protection Superfund representative and was informed that the antimony MCL is the subject of some controversy, which is the reason for the two levels. Further confounding the situation was the discovery of antimony in a blank sample of about 10 ppb. I had Dynamac review the results and I was told that the lab was not confident about the reported numbers and that the lab believed that the reported levels were high. Westinghouse would not have seen antimony at the proposed MCL levels because the Contract Required Detection limits used during Phase I were too high.

Antimony was present in the surface wastes. Because the MCL is not yet final, and because the split sample results are not supportable, EPA will not require resampling now, but in future groundwater sampling during design, EPA will require that at least on round of analysis include antimony.

Westinghouse Plant - PAHs

EPA has reviewed the data submitted by Westinghouse's contractor (RETEC) regarding the high PAH level in the eastern tributary adjacent to PA. RT. 34 (Biglerville Road). EPA has performed a literature search on PAH contamination in sediments. The data indicates that the PAH levels in the sediment adjacent to the culvert under RT. 34 are much too high to be attributable to road runoff. The levels of the pyrenes is also much to high compared to asphalt or road runoff.

As RETEC points out, coal tar fractions from high temperature processes can have pyrene levels similar to, or higher, than the levels observed in the eastern tributary. The PAH levels in the parking lot drainage system are similar to the levels in the eastern tributary near the culvert. Westinghouse has informed EPA that they resurfaced their parking lot. The resurfacing material probably contained coal tar solvent which migrated to the drainage system and the very localized area of the eastern tributary that receives parking lot runoff. The exposure pathways are very limited and the only plausible risk is that children might play in the stream, but this is adjacent to RT. 34 and is very overgrown with vegetation. Additionally, the elevated PAHs seem to be due to a normal use of a commercial product. Children may also be exposed to the same substances in newly resurfaced parking lots and driveways. EPA does not consider this to be a Superfund issue and no further action by Westinghouse is necessary.

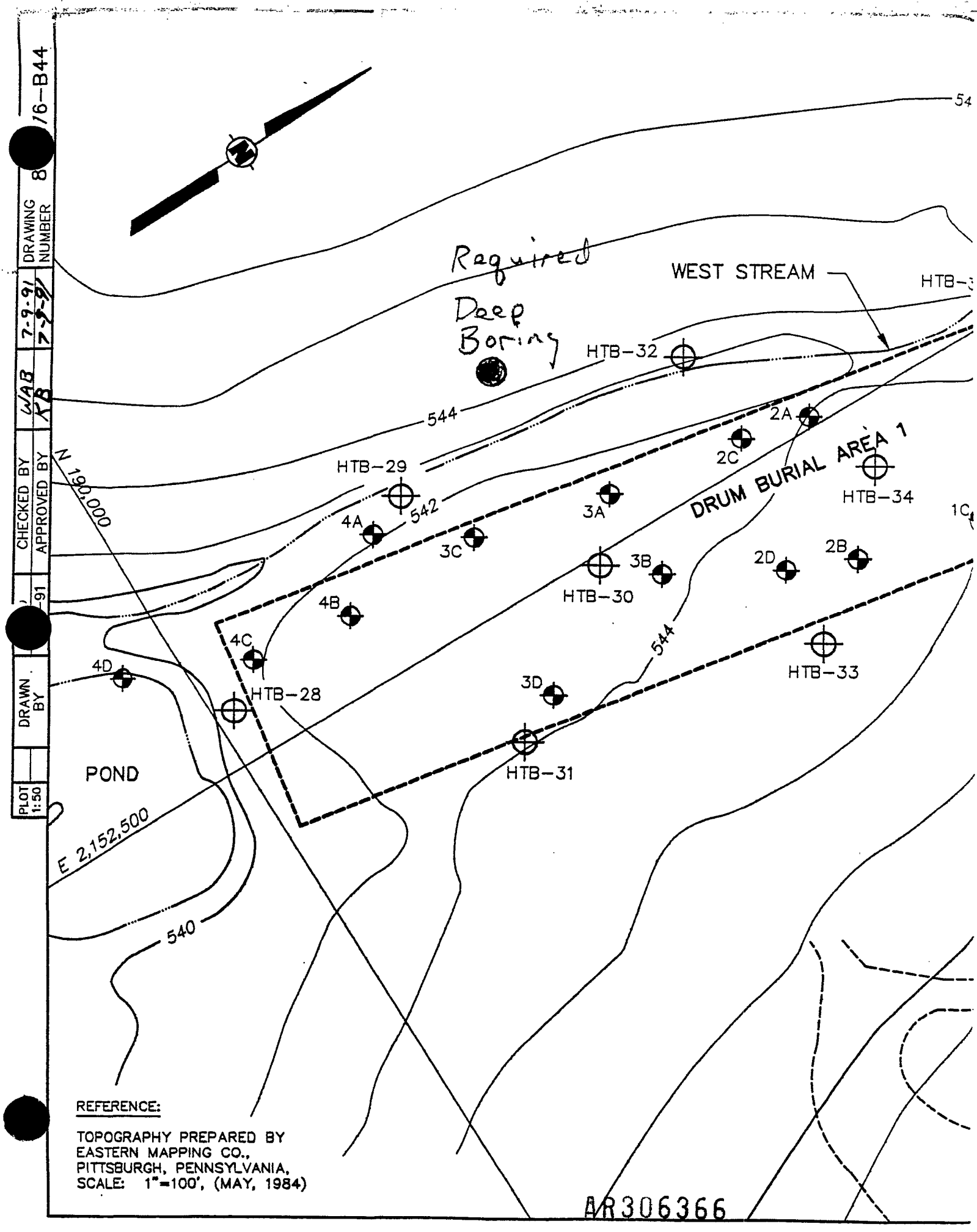
I have strong opinions on the need for the additional requirements discussed above and we have already discussed these requirements at length. If Westinghouse wishes to meet with EPA management to discuss these requirements further or if you have any questions, please contact me at (215) 597-0676.

Sincerely

Frank Vavra

Frank Vavra, Project Manager
CERCLA Western PA Section

cc. Daniel Isales (3RC21)
Jeffrey Pike (3HW33)
Ron Klinikowski (PADER)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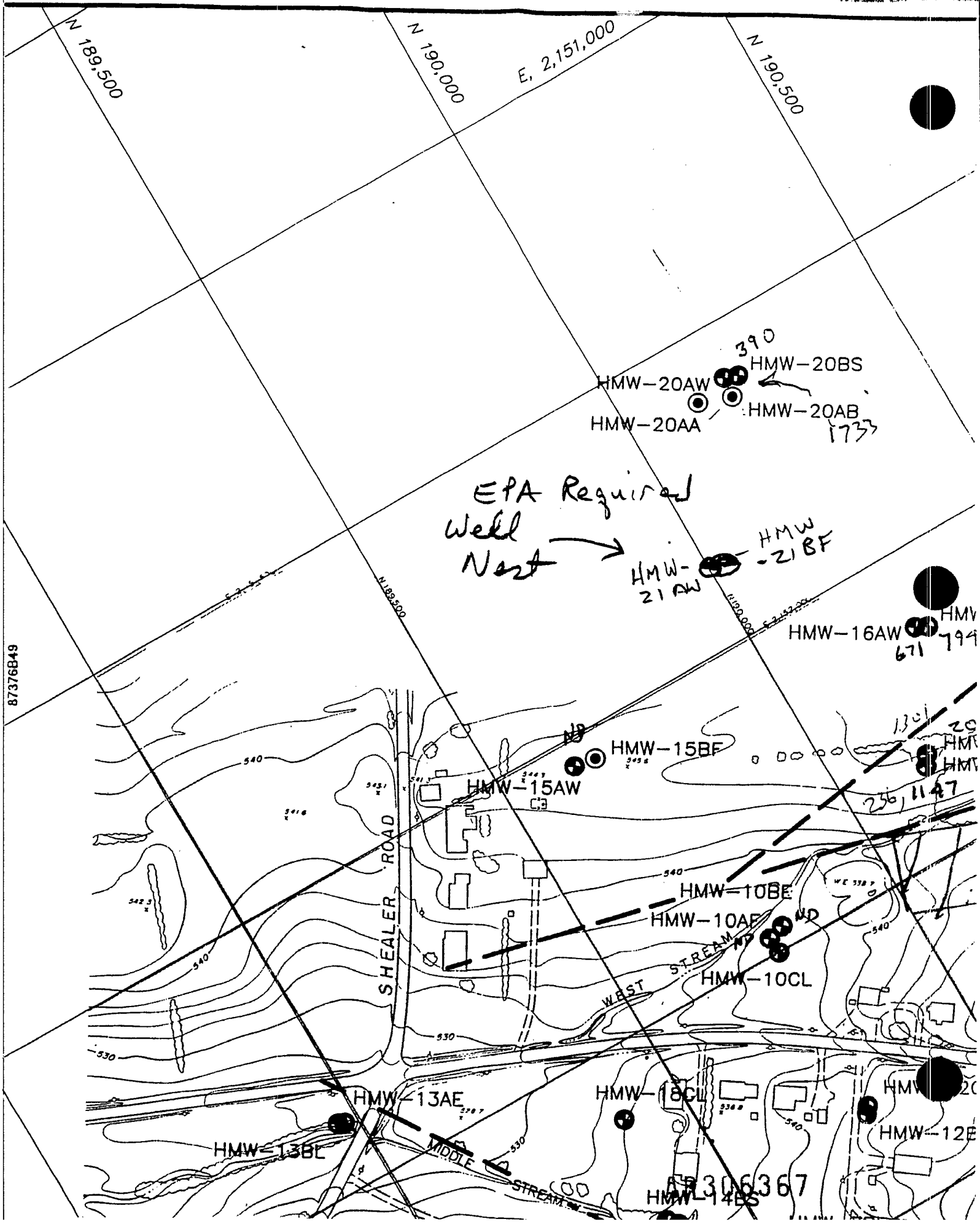
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