

**Long Term Stewardship Report
Dixon Ticonderoga, Rt 61, Deer Lake, PA**

EPA web fact sheet : <http://www.epa.gov/reg3wcmd/ca/pa/webpages/pad041250242.html>

September 30, 2015

A. Pre-Inspection Items

Prior to the site visit, the following pertinent documents were reviewed to ensure remedial components are adequate and up to date:

1. 09/29/1988 3008(h) Order
2. 09/30/1992 FDRTC
3. 09/21/1994 Amendment to Order
4. 09/1993 CMI Program Plan **and** 10/1993 CMI Program Plan Modifications

In addition, financial assurance state of the facility was confirmed; EPA fact sheets, links and mapping documents were reviewed and updated; and a site visit was coordinated with the facility and PADEP. A meeting with the West Brunswick Township officials will be scheduled at a future date.

B. Site visit 07/23/2015

1. Attendees

Name	Affiliation	Phone	Email
Linda Matyskiela	EPA Proj Mgr	215.814.3420	matyskiela.Linda@epa.gov
Bharat Bham	PADEP – NERO Project Mgr	610.861.2156	bbham@pa.gov
Dan Fitzgerald	INTEX	215.766.7230	dfitzgerald@intexenv.com
Todd Daniel	INTEX	215.766.7230	tdaniel@intexenv.com
Ira Walton	United Environmental Services, Inc. – Property Owner Representative	570.788.8180	ira@unitedenvironmental.com

2. Introductions and purpose of visit

3. File review

Does the facility have a copy of:

- | | |
|----------------------------------|------------------|
| a. 09/29/1988 3008(h) Order | Y <u>X</u> N ___ |
| b. 09/21/1994 Amendment to Order | Y <u>X</u> N ___ |
| c. Current NPDES permit | Y <u>X</u> N ___ |
| d. O&M Plan | Y <u>X</u> N ___ |

4. Site Walk

a. Assess locations and conditions of pump and treat components:

1. Air stripper, piping, outfall, and other treatment components: **All components were visible and accessible.**

2. Well Network

Sampling Point	Location? do we have survey data?	Condition
Production (pumping? y/n)		
MW-2		
MW-3D		
MW-3S		
MW-4		
MW-5		
MW-8S (pumping? y/n)		
Video Store		
Non-network wells / Date?		
MW-11		
MW-12		
MW-13		
MW-14		

Other than the Video store well, all components of the monitoring and treatment system were looked at and judged in good condition. Video store well is on private property and will be observed when EPA does its next visit to the facility.

b. Assess location and condition of Lagoon #1 (east, closer to bldg)

1. Cap integrity YES
2. Adequate vegetation YES
3. Location visible but inaccessible due to location

c. Assess location and condition of Lagoon #2 (west, farther from bldg)

1. Cap integrity YES
2. Adequate vegetation YES
3. Location visible but inaccessible due to location

5. Questions/discussion:

1. Is there any deed restriction language/covenant for the property?

No. EPA's Order was issued prior to the time when covenants became common.

2. Is Dixon interested in discussing a covenant for the property?

No. Facility would like to accelerate GW cleanup toward no further treatment/monitoring.

3. Are there any other ordinances that put restrictions on land use or GW use?

EPA's 3008(h) 1988 Order does not allow for potable uses of the GW under the Interim Measures provisions. The impoundments were closed under PADEP oversight which includes a cap. No municipal ordinances affect land or GW use.

4. Any modification to pump and treat or 2 impoundment caps needed? anticipated?

Facility has done some additional GW field work to define the current environmental conditions toward accelerated GW cleanup. GW system may be modified.

5. Any GIS info/data still needed by EPA? PADEP?

Geo-locational data for impoundments is needed. Facility would like to eliminate these units as sources to GW. Locational data and current soil/GW data immediate to the units would likely be necessary to negate these units as sources. Metes and bounds data is needed for all property boundaries, both before and after property sales.

6. Most recent O&M Plan Date? Do we need an update?

Yes an update is needed. Several wells have been incorporated/eliminated from the GW monitoring system since the 1993 modification to the Order. See 8 below.

7. Next steps at Blue Area? O&M plan for Blue Area?

More field work is expected in the Blue Area. After submission, a new O&M plan will be discussed.

8. CHANGES MADE TO PUMP and TREAT SYSTEM POST-IMPLEMENTATION OF 1993 CMI

1. Wells **discontinued pumping**

WELL

MW-5

2. Wells **newly pumping**

WELL

MW-8S – replaces MW-5

3. Wells **discontinued monitoring** post-implementation of 1993 CMI:

WELL

MW-1S

MW-8I

MW-8D

MW-9S
MW-10S
Stone House Well
Driving Range Well

4. Wells **abandoned** post-implementation of 1993 CMI:

<u>WELL</u>	<u>DATE</u>	<u>REASON</u>
MW-1S	Feb 12-13 2013	Rt 61 construction
MW-1D	Feb 12-13 2013	Rt 61 construction
MW-9S	Feb 12-13 2013	Rt 61 construciton
MW-10S	Feb 12-13 2013	Rt 61 construction

5. Wells **(non-network) installed** post-implementation of 1993 CMI :

<u>WELL</u>	<u>DATE</u>	<u>REASON</u>
MW-11	Sept 03, 2013	SG survey high VOCs
MW-12	Sept 03, 2013	SG survey high VOCs
MW-13	May 2014	Pilot SVE removal
MW-14	May 2014	Pilot SVE removal

6. **Reduction in analytes** – began 4th Q 2013 (EPA and PADEP approval)

7. **Post Ex sampling** at wastewater lagoon in 2000 – PADEP closure