



# Long-Term Stewardship Inspection Report

## Fulton Financial Corp.

### EPA ID#: PAD082434747

### East Petersburg, PA

#### Introduction

Long-term stewardship (LTS) refers to the activities necessary to ensure that engineering controls (ECs) are maintained and that institutional controls (ICs) continue to be enforced. The purpose of the EPA Region 3 LTS program is to periodically assess the efficacy of the implemented remedies (i.e, ECs and ICs) and to update the community on the status of the RCRA Corrective Action facilities. The assessment is conducted in twofold, which consists of a record review and a field inspection, to ensure that the remedies are implemented and maintained in accordance to the final decision.

#### Site Background

The Fulton Financial Corp. (Fulton) facility occupies approximately 18 acres and is located in East Petersburg, Lancaster County, Pennsylvania. From the early 1950s to 1977, the site was owned by Hamilton Watch Company who operated a photochemical etching and fuse assembly business. In 1977, Hamilton Watch Company sold the facility to Lancaster Metal Science Corporation (LMS) who continued to operate the photochemical etching business. In 1979, Fulton purchased the property from the Lancaster Industrial Development Authority and converted the site from an industrial manufacturing facility to its current use as administrative offices.

Fulton is currently under an Administrative Order of Consent Order (Order) with the United States Environmental Protection Agency (EPA) to monitor and remediate the groundwater. The contaminants of concerns (COCs) in groundwater are volatile organic compounds (VOCs) that include vinyl chloride, cis/trans 1,2-dichloroethene, and trichloroethylene. The groundwater plume has remained stable and the levels of VOCs have progressively decreased over the years. The plume is contained relatively within the property line. Natural attenuation, predominantly bioremediation, is the primary mechanism for the remediation of the groundwater contamination. Fulton also operates a passive groundwater remediation system that collects groundwater overflow via a sump in the boiler room and treats the groundwater through a series of activated carbon filters prior to discharge to the stormwater drain. Fulton continues to sample the groundwater on a 13 month rotation for the COCs and intrinsic bioremediation parameters to confirm the reduction of groundwater contamination through the process of natural attenuation.

#### Current Site Status

Fulton will continue to monitor the groundwater plume and operate the passive groundwater remediation system to ensure that the plume remains stable and the levels of VOCs continue to be remediated through natural attenuation. At a frequency of every 13 months Fulton submits a report

that presents the groundwater sampling results and updates the status of the groundwater remediation.

### **Long-term Stewardship Site Visit**

On January 28, 2015, EPA conducted a long-term stewardship site visit with Fulton Financial representatives and its contractor to discuss and assess the status of the implemented remedies at the site.

The attendees were:

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Terry G. Cain	Fulton Financial	<a href="mailto:tcain.fult.com">tcain.fult.com</a>	(717) 291-2767
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The remedies implemented at the site include engineering and institutional controls. The status and specifics for the respective controls, and a summary of a variety of topics discussed during the meeting and field inspection are presented in the subsequent sections.

### **Engineering Controls (ECs)**

Engineering controls (ECs) encompass a variety of engineered and constructed physical barriers (e.g., soil cap, subsurface venting systems, fences, groundwater pump and treat) to contain and/or prevent exposure to contamination.

ECs implemented at the site include groundwater monitoring and remediation of the VOCs plume. Fulton will continue to monitor the groundwater to ensure that the implemented corrective action effectively remediates and controls the groundwater plume. Furthermore, Fulton will continue to submit progress reports to EPA that assess the effectiveness of the implemented remedies and to ensure to that the remedies continue to meet the requirements of protection of human health and the environment.

During the meeting, EPA and Fulton discussed the need to conduct indoor air sampling to ensure that potential indoor vapor intrusion related to the VOCs in groundwater is not a concern. In the coming months Fulton will submit a work plan to sample indoor air throughout the buildings at the site. The indoor air sampling is expected to be completed this year. Based on the results, EPA will determine if indoor air vapor intrusion is or is not a concern at the site.

### **Institutional Controls (ICs)**

Institutional controls (ICs) are administrative or legal instruments (e.g., deed restrictions/notices, easements, covenants, zoning) that impose restrictions on the use of contaminated property or resources. ICs are also used to identify the presence of ECs and LTS requirements.

ICs at the facility include land use and groundwater use restrictions. Land use at the site is limited to non-residential use. Any proposed changes in land use beyond the current designated non-residential use will require the approval of EPA and must meet the required cleanup standards for the specific land use. There is no groundwater use at the property. The property is connected to public water for potable purposes. Currently, the legal instruments that enforce ICs at the facility are the EPA Order and the local ordinances.

During the LTS site visit, EPA and Fulton discussed the possibility of unifying the ECs and ICs into an environmental covenant in accordance to the Pennsylvania Uniformed Environmental Covenant Act (UCEA). The environmental covenant will simplify the enforcement of the ECs and ICs and will be a public document that is readily available and easily accessible by the community. However and presently, the ECs and ICs will continue to be enforced through the EPA Order and local ordinances until the groundwater monitoring data demonstrate that the groundwater plume is contained within the property line. If this occurs Fulton may petition to transfer the ECs and ICs into an environmental covenant.

#### **Financial Assurance:**

Fulton will submit its annual financial assurance to EPA to ensure that there are sufficient funds to implement and maintain the remedies at the site.

#### **Field Inspections:**

Prior to the meeting, EPA and Fulton's contractors conducted a field inspection of the site. The areas of the field inspection included the groundwater remediation system and observations of some of the monitoring wells. The implemented remedies are operational and continue to be effective in remediating and containing the groundwater plume.

#### **Community Contact**

Subsequent to the LTS site visit, EPA contacted the East Petersburg Borough officials to inform the Borough the purpose of the LTS site visit and the status of the groundwater monitoring remediation. EPA also informed the Borough that Khai M. Dao is the point of contact at EPA and provided Mr. Dao's contact information if the Borough has any questions regarding the implemented remedies at the Facility.

#### **Follow-up Activities:**

In the coming months Fulton will submit a work plan to sample indoor air throughout the buildings at the site. The indoor air sampling is expected to be completed this year. Based on the results, EPA will determine if indoor air vapor intrusion is or is not a concern at the site. Furthermore, Fulton will submit their financial assurance for 2015.

**Conclusion:**

EPA concludes that the implemented remedies are effective in meeting the objectives of protection of human health and the environment. Fulton will continue to implement the remedies set forth in the Order. Presently, ICs and ECs will continued to be enforced in accordance to the EPA Order and local ordinances. EPA will evaluate the indoor air sample results to assess if the VOCs in groundwater have an impact to indoor air.