



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III

STATEMENT OF BASIS

EMTROL, INC.
LANCASTER, PENNSYLVANIA
EPA ID # PAD 054139506

Prepared by
Office of Pennsylvania Remediation
Land and Chemicals Division
December 2017

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Section 1: Introduction

The United States Environmental Protection Agency (EPA) has prepared this Statement of Basis (SB) to solicit public comment on its proposed decision for the Emtrol, Inc. (currently known as York Technical Institute) facility located at 300 Hempland Road Lancaster, Pennsylvania 17601 (Facility). EPA's review of available information indicates that there are no unaddressed releases of hazardous waste or hazardous constituents from the Facility. Based on that assessment, EPA's proposed decision is that no further investigation or cleanup is required. EPA has determined that its proposed decision is protective of human health and the environment and that no further corrective action or land use controls are necessary at this time. This SB highlights key information relied upon by EPA in making its proposed decision.

The Facility is subject to EPA's Corrective Action Program under the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act (RCRA) of 1976, and the Hazardous and Solid Waste Amendments (HSWA) of 1984, 42 U.S.C. §§ 6901 et seq. (Corrective Action Program). The Corrective Action Program is designed to ensure that certain facilities subject to RCRA have investigated and cleaned up any releases of hazardous waste and hazardous constituents that have occurred at their property. The Commonwealth of Pennsylvania (Commonwealth) is not authorized for the Corrective Action Program under Section 3006 of RCRA. Therefore, EPA retains primary authority in the Commonwealth for the Corrective Action Program.

EPA is providing a 30-day public comment period on this SB and may modify its proposed decision based on comments received during this period. EPA will announce its selection of a final decision for the Facility in a Final Decision and Response to Comments (Final Decision) after the comment period has ended. The Administrative Record (AR) for the Facility contains all documents, including data and quality assurance information, on which EPA's proposed decision is based. See Section 5, Public Participation, for information on how you may review the AR.

Section 2: Facility Background

Emtrol, Inc. is a 7.1-acre parcel of land with an approximately 54,000 square-foot single-story building located in East Hempfield Township at 3050 Hempland Road, west of Centerville Road and south of United States Route 30. The land was undeveloped, residential, and/or agricultural from at least 1864 until the construction of a structure similar to the present-day structure in 1973.

International Signals Corporation (ISC) conducted electronics manufacturing operations from approximately 1973 to 1993 and possibly used solvents in the manufacturing and assembly of electronic components. ISC Defense Systems, Inc., a division of International Signal and Control Corporation, was acquired by Ferranti International, P.L.C. in 1987. In December 1993, Ferranti

International, P.L.C. was forced into bankruptcy. In 1995, Emtrol purchased the property. Emtrol used most of the building space for a design and engineering office. Some space was also used for assembly of electronic controls and automatic storage equipment in support of the baked goods industry.

The physical property and structures of the facility were acquired by YLC, Inc., and the entire building was stripped down and facilities were installed for York Technical Institute (YTI), which started operations in 2003. Blackford Development purchased the property shortly after YTI started their operations and, as of 2008, were leasing it to YTI. A Facility location map is attached as Figure 1.

Section 3: Summary of Environmental History

3.1 Environmental Investigations

A limited Phase II environmental assessment was performed by Blackstone Consulting LLC in 2007. Shallow monitoring wells installed near the southwest corner and the south central portion of the single on-site building identified tetrachloroethylene (PCE) [6.3 parts per billion (ppb)], trichloroethylene (TCE) [9.6 ppb], and 1,1-dichloroethene (1,1-DCE) [84 ppb] in exceedance of EPA's Maximum Contaminant Levels (MCLs). Groundwater in these initial wells installed in 2007 was sampled at a depth of about 4 feet below ground surface (bgs) and determined to be perched water and not represent the local groundwater aquifer. At an unknown time, the wells installed by Blackwell were removed.

Indoor air samples were collected inside the Facility building in 2007. Constituents identified in groundwater (TCE, PCE, 1,1-DCE, and 1,1-DCA) were all non-detect in indoor air. Some VOCs were identified in indoor air samples, but they can be attributed to background sources and were all below EPA residential screening levels.

Michael J. Baker Inc. (Baker) submitted an Environmental Indicator (EI) Inspection Report in August 2010 under Pennsylvania Department of Environmental Protection (PADEP) contract through EPA to gather relevant information in order to determine whether human exposures and groundwater releases are controlled. The EI Report indicated that there was insufficient data to determine the extent of soil and groundwater impacts and potential exposure conditions.

ARM Group Inc. later performed a limited Phase II environmental assessment in 2014 and installed five monitoring wells at locations as close as possible to the former Blackstone wells as well as near a former hazardous waste storage shed. Similar to the 2007 results, TCE (220 ppb), PCE (49.5 ppb), 1,1-DCE (915 ppb), and 1,1-dichloroethane (249 ppb) were identified in shallow perched water.

Based on the 2014 results, ARM Group Inc. performed a groundwater assessment in August 2014. Four aquifer groundwater monitoring wells were installed near and downgradient of the

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impacted perched water location. TCE (1.8 ppb) and trichlorofluoromethane (1 ppb) were identified in aquifer monitoring well ARM-4, the closest well to the impacted perched water, at concentrations below the EPA MCLs.

As part of the site assessments performed by Blackstone and ARM in 2007 and 2014, surface and subsurface soil samples were collected. Minor levels of concentrations of several Volatile Organic Compounds (VOCs) were detected in the soil samples.

A Remedial Investigation Report & Cleanup Plan (RICP) was submitted by ARM Group Inc. on July 22, 2015. The RICP summarized the investigations and results discussed above. For soils, the RICP concluded that soil samples were below their respective PADEP Statewide Health Medium Specific Concentrations (MSCs) for residential and non-residential use and no cleanup plan or soil remediation was required. For indoor air, the RICP utilized the 2007 indoor air results and concluded that results were below PADEP's non-residential screening value. For vapor intrusion, the RICP concluded that groundwater concentrations were below PADEP's non-residential groundwater screening value for protection of indoor air under a non-residential use. For groundwater, the RICP concluded that groundwater quality beneath the YTI site meets the residential and non-residential MSCs at the points of compliance as defined by PADEP for both used and non-use aquifers. However, because VOCs have been detected in the groundwater near the southwest corner of the existing on-site building, ARM proposed to continue quarterly groundwater monitoring through eight quarters to demonstrate the groundwater quality is stable and/or improving.

A Final Report was submitted by ARM Group Inc. on September 8, 2017 and a revised version submitted on November 14, 2017. The Final Report specified that the intent was to attain residential cleanup standards. The Final Report summarized the continued quarterly groundwater monitoring rounds proposed in the RICP which resulted in nine rounds of data. The final four quarterly monitoring event results were non-detect for all constituents. Additionally, the Final Report concluded that no vapor intrusion or ecological hazards exist per assessments performed following PADEP guidance or regulation. The Final Report concluded that attainment of the residential statewide health standards for soil and groundwater has been achieved. The Final Report was approved by PADEP on November 14, 2017.

3.2 EPA Assessment

A Notice of Intent to Remediate (NIR) for the Facility submitted on October 5, 2016 selected the option of entering into the One Cleanup Program as per the Memo of Understanding (MOU) between the PADEP and the EPA. Therefore, the EPA evaluated and provided input during the post EI Report environmental investigations to assure RCRA Corrective Action Program requirements were satisfied. These investigations were completed under PADEP oversight pursuant to PADEP's Act 2 Program. Soil and groundwater sampling results in those reports were compared to Act 2 MSCs. For the constituents mentioned, direct contact soil standards are within EPA's acceptable RSL risk range for Corrective Action, and groundwater standards are equivalent to EPA's MCLs.

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Shallow perched groundwater concentrations exceeded EPA indoor air screening levels and are located within 100 feet of the building located on the neighboring property which has an industrial use. EPA requested additional sampling to determine if there is a potential for vapor intrusion impacts to that receptor. ARM performed two rounds of soil vapor sampling in February and April 2017. Results were included in the Final Report. The February sampling event identified TCE, PCE, 1,1-DCE, 1,1-DCA, trichlorofluoromethane, and 1,1,1-trichloroethane in the samples. All constituents were non-detect in the April sampling results. ARM utilized EPA's Vapor Intrusion Screening Level (VISL) Calculator to determine whether or not an indoor air risk is present. Initially, ARM evaluated the results using VISL and concluded there is no concern for non-residential exposure since that is the current use.

The Final Report specified that the intent was to attain residential cleanup standards, therefore EPA requested ARM calculate the residential risk using the VISL Calculator. EPA also performed its own VISL Calculator evaluation in November 2017. Results provided in the Revised Final Report submitted November 14, 2017 and from EPA's evaluation showed that constituents are within EPA's acceptable risk range for Corrective Action and would not cause a vapor intrusion risk under residential use. Therefore, EPA has determined that vapor intrusion into indoor air is not a concern at the Facility.

Based upon the information presented in the Act 2 Final Reports and EPA's assessment, EPA considers the releases to have been remediated appropriately and protection of human health and the environment to have been achieved.

Section 4: Public Participation

Interested persons are invited to comment on EPA's proposed decision. The public comment period will last 30 calendar days from the date that notice is published in a local newspaper. Comments may be submitted by mail, fax, e-mail, or phone to Mr. Kevin Bilash at the address listed below.

A public meeting will be held upon request. Requests for a public meeting should be made to Mr. Kevin Bilash at the address listed below. A meeting will not be scheduled unless one is requested.

The Administrative Record contains all the information considered by EPA for the proposed decision at this Facility. The Administrative Record is available at the following location:

U.S. EPA Region III
1650 Arch Street
Philadelphia, PA 19103
Contact: Mr. Kevin Bilash (3LC20)
Phone: (215) 814-2796
Fax: (215) 814-3113
Email: bilash.kevin@epa.gov

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Section 5: Signature

EPA has determined that its proposed decision for Emtrol, Inc. is protective of human health and the environment and that no further corrective action or land use controls are necessary at this time.

Date: 12/5/2017



Martha Shimkin, Acting Director
Land and Chemicals Division
US EPA, Region III

Figure 1 – Facility Location Map

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Limited Phase II Environmental Site Assessment Report – Blackstone Consulting, LLC March 14, 2007

EMSL 280700451, Project TO-15 Analysis (indoor air lab report), April 4, 2007

Environmental Indicator Inspection Report – Baker, August 2010

Limited Phase II Environmental Site Assessment, ARM Group Inc. – June 24, 2014

Groundwater Assessment, ARM Group Inc. – September 17, 2014

Remedial Investigation Report & Cleanup Plan, ARM Group Inc. – July 22, 2015

EPA VISL Calculator Results, EPA – November 2017

Final Report – ARM Group, Inc. September 8, 2017 (revised November 14, 2017)

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LON= 76°23'55.78"W
LAT = 40° 3'1.19"N

SOURCE:
GOOGLE.com

SCALE: Approx. 1"=400' DATE: OCTOBER 2009
S.O. NO.: 114484 FILE: 114484_EMTR-01
DSN/DWN: JPK/RRR CHK: JPK

Baker

MICHAEL BAKER JR., INC.
MOON TOWNSHIP, PENNSYLVANIA

FIGURE 1
FACILITY LOCATION MAP
FORMER EMTROL, INC.,
3050 HEMPLAND ROAD,
LANCASTER, PENNSYLVANIA