



## Long-Term Stewardship Assessment Report

Sensient Technical Colors

EPA ID #: PAD002917466

Birdsboro, PA

Assessment Date: July 3, 2018

Report Date: July 12, 2018

**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 Environmental Protection Agency (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 Resource Conservation and Recovery Act (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 Facility is located at 2529 Main Street, approximately one mile east of the town of Gibraltar and five miles southeast of Reading, in Robeson Township, Berks County, Pennsylvania. The approximately 140-acre site is bordered on the north by the Schuylkill River. Warner Jenkinson used about 30 acres of the property to manufacture dyes. The rest of the property was not developed but at one time certain areas were leased and used for agricultural purposes.

In the early 1980s, a former burn pit, used to burn various wastes such as pallets, fiber drums, salt bags, and office trash, was excavated, backfilled with clay, and paved over. During 1993 and 1994, a drum disposal area and the former waste disposal lagoon were remediated as residual waste units because the main contaminant is non-hazardous Chromium III. The areas received a release from liability on December 6, 1999 upon Pennsylvania Department of Environmental Protection (PADEP) approval of the Act 2 Final Report.

There are two closed RCRA impoundments onsite and three closed residual waste impoundments. The two RCRA impoundments (Impoundment 1 and 2) contain waste that is EP Toxic for trivalent chromium. Interim measures were complete after all impoundments were stabilized and closed in accordance with PADEP requirements and with PADEP approval. Closure of the residual impoundments included excavation and consolidation into impoundment 4B. The final impoundment, 4B, received final closure certification on November 29, 2005.

**Current Site Status:** In 2007, EPA issued the Final Decision and Response to Comments (FDRTC). The final remedy determination is No Further Action with Controls. Institutional Controls include a Deed Notice requiring non-residential land use and a restriction on shallow groundwater use. A groundwater monitoring system is in place for metals under PADEP's Solid Waste Program. Engineering Controls include O&M of the closed Impoundments 1, 2, and 4B.

**Long-term Stewardship Site Visit:** On July 3, 2018, EPA conducted an LTS site visit with PADEP, Sensient representatives, and township officials to discuss and assess the status of the implemented remedy at the site.

The attendees were:

Name	Organization	Email Address	Phone No.
Kevin Bilash	EPA Region 3	<a href="mailto:bilash.kevin@epa.gov">bilash.kevin@epa.gov</a>	215-814-2796
Mike Maoili	PADEP	<a href="mailto:mmaiolie@pa.gov">mmaiolie@pa.gov</a>	610-916-0144
Charlene Sauls	PADEP	<a href="mailto:chsauls@pa.gov">chsauls@pa.gov</a>	717-705-4959
John O'Such	Sensient	John.O'Such@sensient.com	610-207-7856
Eric Grinrod	Spotts, Stevens and McCoy	<a href="mailto:Eric.grinrod@ssmgroup.com">Eric.grinrod@ssmgroup.com</a>	610-898-3085
Collen Easterday	Robeson Township	<a href="mailto:ceasterday@robeson township.com">ceasterday@robeson township.com</a>	610-582-4636
Harold Steve	Robeson Township	<a href="mailto:hwstevejr@aol.com">hwstevejr@aol.com</a>	484-529-3111

To note, EPA performed this LTS site visit with the confirmation of typical assessment observations already confirmed by PADEP during the recent April 13, 2018 routine inspection of the closed impoundments conducted at Sensient. Observations from that inspection report are:

a) Impoundment 1 was observed to have a continuous grass cover and no erosion rills or gullies. No runoff from or disturbance of the vegetative cover was noted in this area. No woody plant growth or animal burrows were noted.

b) Impoundment 2 was observed to be covered in grass and had no erosion rills/gullies or woody plant growth. No animal burrows were noted.

c) Impoundment 4B had a continuous grass cover with no disturbed areas needing repair observed. Bench down chutes/drains appear well maintained and no erosion rills or gullies were evident. No woody plant growth was present.

d) All monitoring wells observed in the vicinity of the impoundments were well marked and caps were locked.

e) Impoundments are mowed in the spring and fall each year. Impoundment caps and slopes are well maintained.

**RECORDS:**

a) Groundwater monitoring and witness zone monitoring of Impoundment 4B are conducted by Sensient. Sample results and related data continue to be submitted to Charlene Sauls on a quarterly basis.

b) Sensient has a contract for annual inspection, eradication and repair of groundhog/rodent damage.

**NO RECOMMENDATIONS/NO VIOLATIONS NOTED**

**Institutional Controls (ICs) Status:**

A deed restriction (Deed Book Vol. 1478 Pg. 1114, Vol. 1535 Pg. 195) recorded September 24, 1995 is the method for implementing institutional controls relied upon and discussed in the Statement of Basis and FDRTC. The following ICs apply to the entire Facility:

*Land Use Restriction:* The use of the Property shall be restricted to non-residential uses only. There were no residential structures or uses of the site at the time of the visit. The Property is secured with fencing.

*Groundwater Use Restriction:* Shallow groundwater at the Property shall not be used for potable purposes or in any other manner which could increase the risk of exposure to contaminants by humans

or the environment without the express approval of the PADEP. The Facility is currently vacant and there were no uses of groundwater at the time of the visit.

**Engineering Controls (ECs) Status:**

*Impoundment O&M:* Impoundments 1, 2, and 4B are capped, closed, and the areas surrounded by fence. There were no signs of concern during the site assessment. PADEP April 13, 2018 site inspection observations note no issues.

**Financial Assurance:** Financial Assurance has been established in the form of two bonds held with PADEP. Sensient has satisfied all financial assurance requirements and is currently in compliance.

**Reporting Requirements/Compliance:** Quarterly groundwater monitoring is performed and results submitted to PADEP via Form 14R. Sensient is in compliance with these requirements. Site wells include:

Monitoring Wells		
MW-1*	MW-8	MW-15
MW-2	MW-10*	MW-16
MW-4*	MW-11*	MW-17
MW-5	MW-12	MW-18
MW-6	MW-13	MW-19
MW-7	MW-14	MW-21**

- \*Water level only
- \*\* sampled but not required on Form 14R

Additional quarterly sampling is conducted from the Impoundment 4B Witness Zone (Leachate) and from two unnamed tributary surface water sampling points (ST-1 and ST-2).

**Mapping:** The EPA website map is accurate and includes the 140-acre Sensient Facility. The map was not field verified due to equipment issues but no issues were noted. A downloadable geospatial PDF map is available on EPA’s corrective action facility webpage under the “Reports, Documents and Photographs” section.

**Notes/Discussion:** In preparation for the site visit, EPA contacted PADEP. PADEP sent communication from a recent inquiry regarding possible site redevelopment. The township previously communicated with the same individual. No firm redevelopment request has been submitted, but the proposal indicated a stadium, sports fields, etc. that the township does not think would approved. The individual is aware of the impoundments and restrictions on the Facility.

Redevelopment funding, opportunities, and potential uses were discussed with the township. They have been in communication with the county redevelopment authority. EPA and PADEP offered their assistance in future discussions or meetings, if desired.

Updating the deed restrictions to conform with the UECA was discussed. There were brief discussions in the past but not followed through. Cost, complications, and procedure were briefly discussed on how this could occur. Currently, there is no requirement to update the deed restriction; doing it as a best

management practice and to aid in possible site redevelopment was specified. EPA proposed sending an email to the site contact and forwarded to the corporate officers suggesting this approach.

Previously, certain portions of the Facility were leased for agricultural purposes. Sensient confirmed that no longer occurs. Therefore, there is no possibility for accidental intrusion into the impoundment area nor possible use of the groundwater.

In addition to the groundwater monitoring wells, two former production wells (Well-3 and Well-4) still exist. These wells are covered with small sheds and are not being abandoned in case of future need. Well-3 was observed (pics taken by PADEP). Well-4 was too far back in a tree covered area and decided not to be observed. PADEP asked if these deep wells were ever sampled and Sensient confirmed they were.

The possibility and procedure for reducing the groundwater monitoring from quarterly to some other frequency was discussed. EPA and PADEP would both be acceptable to reviewing a request from Sensient to reduce the sampling frequency. Sensient anticipated they will investigate this approach.

**Conclusions and Recommendations:** No EC/IC deficiencies were identified. EPA has determined that the remedy institutional and engineering controls have been fully implemented and are effective in eliminating or reducing exposure of all potential receptors to known contamination. EPA will follow up with an email suggesting replacing the deed restriction with a UECA Environmental Covenant.