



## First Long-Term Stewardship Assessment Report

DuPont

EPA ID #: PAD003038056

Towanda, PA

Assessment Date: September 27, 2018

Report Date: September 27, 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 192 Patterson Boulevard, Towanda, Pennsylvania. The Facility is approximately 51-acres. The Plant has been in operation since the early 1940s and consists of office, manufacture, and maintenance buildings.

On December 22, 2018 EPA issued a Final Decision and Response to Comments and Permit Modification for Corrective Action selecting Monitored Natural Attenuation with Institutional Controls as the final corrective measures for DuPont. Accordingly, on November 28, 2011 Dupont and EPA finalized an Environmental Covenant (EC) to establish activity and use limitations.

**Current Site Status:** The facility continues to operate in an industrial manufacturing use as it was during the assessments and Final Decision. Groundwater sampling is completed in accordance with the 2008 Quality Assurance Project Plan. Dupont continues to satisfy its Corrective Action obligations through submittals in accordance with the Permit Modification, Environmental Covenant, and Final Decision.

**Long-term Stewardship Site Visit:** EPA performed an LTS field inspection with Dupont representatives on September 27, 2018. The visit started at approximately 10 AM and was completed around 11:15 AM.

The LTS visit began with a meeting with introductions, a brief explanation of the LTS initiative, and questions/discussions. The LTS checklist questions were reviewed and three pertinent items came up during the meeting:

1. DuPont submitted a document that had been discussed previously; a request to terminate the Permit Modification. DuPont will also submit an electronic version.

2. EPA identified an item during the desk review; a receipt of the EC recordation with date was not located. Dupont located and provided a copy to EPA.
3. DuPont explained that a name change would be occurring in February 2019 due to the merger of Dupont and Dow. This was discussed and not expected to affect the EC. DuPont also asked if there was anything they needed to submit to EPA regarding the name change. EPA will review and follow up.

During the site walk: All monitoring wells were visibly checked and no issues were identified.

**Institutional Controls (ICs) Status:**

The December 22, 2008 Final Decision and Response to Comments requires, and the December 22, 2008 Permit Modification acts as the mechanism to enforce, ICs and is still in place. The required Institutional Controls are:

- a. an environmental covenant to be entered pursuant to the Pennsylvania Uniform Environmental Covenants Act, 27 Pa. C.S. Sections 6501-6517, (UECA) and to be recorded with the deed for the Facility property. The Environmental Covenant is required to include the following restrictions:
  - i. a restriction on the use of groundwater beneath the Facility for potable purposes or any other use that could result in human exposure, unless such use is required by the Final Remedy, and
  - ii. a restriction on well drilling at the Facility without prior EPA approval, to prevent inadvertent exposure to the contaminated groundwater and adverse affects to the Final Remedy.
- b. in the event DuPont intends to sell part or all of the Facility, DuPont will notify EPA and demonstrate that the prospective purchaser is aware of the restrictions described in paragraphs I.a.i. and ii., immediately above.

**Engineering Controls (ECs) Status:**

There are no ECs required at this Facility.

**Financial Assurance:** Financial Assurance has been established and Dupont has satisfied all financial assurance requirements and is currently up to date and in compliance.

**Reporting Requirements/Compliance:** Groundwater monitoring is performed once per every five quarters. Results are submitted in a Final Remedy Status Report, the most recent dated February 2018. DuPont is in compliance with these requirements. Facility wells include:

MW-03C	MW-16
MW-06A	MW-17
MW-07	MW-18
MW-08	MW-19
MW-15	SW-04

**Mapping:** The EPA website map is accurate and includes the Facility. A downloadable geospatial PDF map is available on EPA's corrective action facility webpage under the "Reports, Documents and Photographs" section.

**Notes/Discussion:** EPA needs to follow up on DuPont's name change submittal question. DuPont will submit an electronic copy of the Permit Termination Request. There is no follow up necessary by DuPont regarding the EC recordation.

**Conclusions and Recommendations:** No IC deficiencies were identified. EPA has determined that the remedy institutional controls have been fully implemented and are effective in eliminating or reducing exposure of all potential receptors to known contamination.