UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III

STATEMENT OF BASIS

CAPITOL PRODUCTS CORPORATION
MECHANICSBURG, PENNSYLVANIA
EPA ID# PAD 003004405

Prepared by
Office of Pennsylvania Remediation
Land and Chemicals Division
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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 former Capitol Products Corporation (Capitol) facility located at 6034 Carlisle Pike (Route 11), Mechanicsburg, PA 17055 (Facility). EPA's review of available information indicates that there are no unaddressed releases of hazardous waste or hazardous constituents from the Facility. EPA's proposed decision for the Facility consists of natural attenuation with: 1) groundwater monitoring, 2) land and groundwater use restrictions, and 3) compliance with a Pennsylvania Department of Environmental Resources (PADER), now the Pennsylvania Department of Environmental Protection (PADEP), January 27, 1995 Consent Order and Agreement (COA). 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

The Facility property consists of approximately 45 acres and is surrounded by U.S. Route 11 to the north, Overnight Transportation Company/UPS Freight on the west, the United States Navy Ship Parts Control Center (NSPCC) to the south and southeast, and Brandywine Group on the east. A Facility location map is attached as Figure 1.

Capitol owned the Facility from 1956 until it was sold to Olympic Realty and Development Corporation in 1995. Prior to 1956, several families owned the properties that became Capitol. Activities on the properties prior to 1956 are unknown. Ethyl Corporation obtained a controlling interest in Capitol Products in 1969. Tredegar Industries (now Tredegar Corporation),

headquartered in Richmond, VA, became the sole shareholder of Capitol in July 1989 when Ethyl Corporation spun off its plastic and aluminum businesses, including Capitol. Due to continuous business deterioration, the Facility closed in February 1991 and was marketed for sale. The William L Bonnell Company (Bonnell), a subsidiary of Tredegar, is overseeing the ongoing environmental activities at the former Capitol property.

To facilitate the redevelopment, the Facility was demolished in 1994. The former Facility is currently occupied by a shopping center complex that includes Home Depot, Dick's Sporting Goods, and other commercial entities along Carlisle Pike.

Section 3: Summary of Environmental History

3.1 Environmental Investigations

In 1989, Science Applications International Corporation (SAIC), now Leidos, Inc. (Leidos), finalized and submitted an Environmental Priorities Initiative Preliminary Assessment under an EPA contract to evaluate the environmental integrity of the Facility. Five Solid Waste Management Units (SWMUs) were identified: a wastewater treatment system, a 30-cubic-yard chromium hydroxide sludge roll-off, a waste paint and waste solvent drum storage area, four 700-gallon waste sodium hydroxide tanks, and an empty drum storage area. No releases or remedial actions were identified from the SWMUs. Also, no wastes were disposed at the Facility during its operation. However, it was reported that a concrete-lined wastewater lagoon and an unlined contact cooling water lagoon were closed under PADER supervision in the summer of 1985.

In anticipation of the Facility closure and possible ownership transfer, a Phase I was performed by CH2M HILL in August 1990 to assess environmental conditions. Based on the results, a Phase II soil boring and groundwater well installation program was begun in the Fall of 1990 to evaluate accessible source areas. From 1991 through 1993, a soil boring program advanced 30 borings to investigate all suspected source area, including identified SWMUs. The investigation identified limited volatile organic compounds (VOCs), no semi-VOCs, and no levels of inorganic constituents above background concentrations. Primarily, the VOCs detected consisted of benzene, 1,1-dichloroethene, cis/trans 1,2-dichloroethene, trichloroethene, 1,1,1-trichloroethane, tetrachloroethene, and vinyl chloride which are the current constituents of concern (COCs). The investigation was unable to identify the source area for VOCs detected in the groundwater. The groundwater investigation included the installation of thirteen monitoring wells ranging in depths from 33 to 120 feet below grade surface (bgs). Potentiometric surface maps indicate a radial hydraulic gradient to the west, southwest, and south from the facility. Interpretation of local dye studies, carbonate bedrock flow, and fracture trace studies indicate the overall regional groundwater flows north.

Capitol decided to demolish onsite structures to promote the property for marketing and redevelopment. In April 1994, Capitol submitted a Notice of Demolition Activities was sent to

PADER.

On July 12, 1994, PADER reviewed five soil and groundwater reports generated during the demolition: *Soil and Electromagnetic Investigation, Evaluation of Site-Wide Groundwater Quality, Evaluation of Groundwater Quality, Subslab Soil Screening Letter, and Design for Soil Bioremediation*. PADER agreed that the soil sample results demonstrated that no remediation was necessary.

Upon completion of demolition activities, SAIC completed six environmental investigation, remediation, or monitoring projects at the Facility, as follows:

1. On September 9, 1994, SAIC sent Capitol a summary of completed chromium concrete abatement activities. Chromium staining was the result of leakage from aluminum painting and cleaning booths. Approximately 6 tons of chromium impacted concrete dust was shipped to a Michigan disposal facility.

2. On October 17, 1994, SAIC sent a work plan to PADEP summarizing conclusions from a September 27, 1994 meeting. Remedial action criteria on chromium contaminated soil beneath the concrete included 1,000 mg/kg total chromium screening standard. For TPH, the field screening standard was agreed to be 500 mg/kg.

3. On November 18, 1994, Capitol sent PADEP an evaluation of Pentachlorophenol (PCP) in shallow groundwater showing seasonal variation. PCP was only detected in ME-DG-11D and was not migrating. No PCP was detected in the former spray pond area and no facility activities or records were identified relating to PCP usage. PADEP approved closure and abandonment of ME-DG-11D in 1996 due to redevelopment at the well location.

4. Capitol sent PADEP a closure plan for a deep in-house well (689 feet deep former production well) on November 29, 1994. SAIC concluded in June 1994 that groundwater chemistry encountered in the in-house well was representative of the regional deep groundwater flow system and not the local shallow groundwater flow system penetrated by the Capitol monitoring wells. VOCs present in the in-house well were similar to VOCs known to be present in the adjacent NSPCC. Thus, this contamination was likely from off-site source areas. Capitol correspondence to PADEP on September 2, 1994 suggested the in-house well be abandoned to prevent cross-contamination between shallow groundwater and the deep aquifer. Per the request of PADEP, this well still exists.

5. On May 27, 1994, Capitol notified PADEP that a 252,000-gallon Aboveground Storage Tank that was removed from service in 1986 was removed from the Facility.

6. Laboratory analyses received and documented in an October 21, 1994 letter showed TPH constituents were not detected during the removal of a 6,000-gallon No. 2 fuel oil Underground Storage Tank discovered during the removal of two concrete floors. PADEP

notified Capitol allowing the closure for the UST on October 3, 1994; no holes were observed in the tank.

The January 27, 1995 COA was established between PADEP and Capitol and Olympic Realty & Development Corporation on January 27, 1995. The document stated contamination exists and remediation activities will meet PADEP Cleanup Standards without threat of further groundwater contamination. The Remediation Work Plan provided for the excavation, bioremediation, and off-site disposal (as necessary) of contaminated soils. The work plan also included monitoring of groundwater and the implementation of remediation in the event monitoring results demonstrate that groundwater quality does not show a decreasing trend in VOC concentrations. The document prohibits use of the groundwater for potable use. The Remediation Work Plan describes the remediation activities that have taken place at the facility and identified the remediation obligations by Capitol under the COA. The COA is recorded in the Cumberland County Recorder of Deeds and is transferable to subsequent property owners.

On February 2, 1995, Capitol submitted the Closure Report for the Soil Bioremediation Project which contained results of the soil monitoring program and soil sampling results involving 5,000 cubic yards of petroleum-impacted soil. All closure samples contained TPH concentrations below the laboratory detection limit or below the 500 mg/kg negotiated cleanup standard. Active treatment was discontinued as bioremediation objectives were met. PADEP reviewed the Closure Report for the Soil Bioremediation Project and approved the use of soils for fill on site as specified in the work plan on February 16, 1995.

Capitol submitted the Investigation of Soil Beneath the Floor - Volumes I & II to PADEP on July 7, 1995 noting: the concrete slab was removed in June 1994 and investigative and post-excavation confirmation soil samples were collected. Soils with more than 500 mg/kg of TPH were excavated. Soils containing TPH concentrations greater than the 500 mg/kg soil standard remained at the soil/bedrock interface after the conclusion of remedial activities. All chromium-contaminated soil was excavated. All post-excavation samples indicated that all impacted soil was removed, treated, and/or disposed with no further excavation necessary.

On December 13, 1995, PADEP reviewed the Closure Report for Soil Bioremediation Project and results were satisfactory, meeting the goals outlined in the January 27, 1995 COA.

On August 20, 1996, Capitol sent PADEP the Removal of Subsurface Site Improvements noting 2,429 tons of TPH and VOC-impacted soil, aluminum dross, and debris were excavated from the building footprint and 200 tons of TPH-impacted soil were excavated and disposed from the parking area. At the request of PADEP, no excavation occurred within the limits of the former lagoon spray pond.

PADEP agreed that MW-14 could be reduced from quarterly to semiannual monitoring following a long-term decline in contaminant levels on December 24, 1996. PADEP came to the same conclusion on May 20, 1997 for ME-DG-9 and MW-13 following a long-term decline in contaminant levels.

Capitol submitted the results of the first semi-annual groundwater-sampling event for 2005 on May 13, 2005 to PADEP and included laboratory results. ME-DG-9 and MW-13 exhibited benzene and PCE compounds above the applicable MCLs. All remaining wells did not have compounds above the MCL.

On November 30, 2006, Capitol submitted the results of the semi-annual groundwater-sampling event to PADEP. From the results, SAIC stated that natural attenuation processes were in place in the area of MW-13. PADEP acknowledge receipt of the September 2006 Groundwater Monitoring Report on February 15, 2007. In response to the request to perform annual instead of semi-annual sampling, PADEP recommends obtaining an Act 2 release of liability or continue with the sampling regime outlined in the COA.

Subsequent semi-annual groundwater monitoring letters have been, and continue to be, sent by SAIC to PADEP from 2007 to the present. MW-13 continues to be the only well to exhibit 1,1-DCE, PCE, TCE, and vinyl chloride above their respective MCLs. SAIC conclusions are that from the analytical results presented, there appears to be no evidence of an identified trend (increasing or decreasing) in chlorinated hydrocarbon concentrations in the six wells being monitored semi-annually.

3.2 EPA Assessment

EPA evaluated the environmental investigations described above and the continuing groundwater monitoring reports to assure RCRA Corrective Action Program requirements were satisfied. The activities had been completed under PADER/PADEP oversight pursuant to the COA. Soil and groundwater sampling results in those reports were compared to PADER 1991 standards. For the COCs mentioned, EPA determined that direct contact soil standards are within EPA's acceptable Regional Screening Level (RSL) risk range for Corrective Action, and groundwater standards are equivalent to EPA's MCLs.

For soils, remedial activities performed have sufficiently addressed soil contamination equivalent to what is expected under Corrective Action. Soil has been sampled or remediated and shown to meet EPA RSLs for industrial use. Therefore, EPA has determined that soils are not a concern at the Facility under current use.

For groundwater, per the COA, if during the monitoring period, VOC concentrations in any of the compliance wells do not show a decreasing trend (after consideration of seasonal variation), a groundwater remediation assessment will be prepared and submitted to PADEP for approval. To date, an increasing trend has not been established from the semi-annual groundwater monitoring. However, EPA noticed increasing concentrations in MW-13 beginning in approximately September 2006. Groundwater concentration fluctuations continued and EPA requested that Bonnell assess the extent of the COCs.

Groundwater fate and transport modeling results submitted by Bonnell approximate minimum downgradient distances for the VOCs in MW-13 to reach MSCs from 1500 to 3200 feet. In all cases, model predictions show concentrations of VOCs above MCLs extending beyond the

downgradient facility boundary. Furthermore, the neighboring Halls Motor Transit Company/Overnite Trucking Corporation/UPS Freight property has documented soil and groundwater investigations and remediation that have taken place on their property to the west. Investigations and remedial activities for free-phase LNAPL have and continue to occur at the facility; however, the contaminant impact is limited to the facility.

EPA reviewed an April 2016 Site Characterization Report prepared for the UPS Freight by Arcadis, U.S., Inc. Capitol-related COCs sampled on the UPS Property were detected at estimated low levels, but well below EPA MCLS. The closest UPS well is located approximately 475 feet from Capitol's impacted well, MW-13. Furthermore, in response to EPA's request to assess the extent of the COCs, Bonnell submitted an Interpretation of Groundwater Flow Direction letter report, prepared by Leidos, on March 12, 2108. Leidos concluded that groundwater flow is to the north, not the south or west as suggested by groundwater monitoring contour maps. EPA agreed and based upon these lines of evidence, the extent of COCs is known to not impact neighboring properties and no exposure to the contaminants. Therefore, EPA has determined that groundwater is not a concern at the Facility under current use.

Shallow groundwater concentrations exceeding MCLs in MW-13 are located within 100 feet of a commercial building located on the property (Home Depot). EPA evaluated the most recent November 2018 concentrations to determine if the there is a potential for vapor intrusion impacts to receptors. EPA utilized the Vapor Intrusion Screening Level (VISL) Calculator to determine whether or not an indoor air risk is present. EPA performed its VISL Calculator evaluation in December 2018. Results 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 industrial/commercial use. Therefore, EPA has determined that vapor intrusion into indoor air is not a concern at the Facility under current use.

EPA evaluated the environmental actions and EPA's assessment against its criteria used to evaluate a proposed decision consistent with EPA guidance. The criteria are applied in two phases. In the first phase, EPA evaluates three decision threshold criteria as general goals: protect human health and the environment; achieve media cleanup objectives; and remediating the source of releases. In the second phase, for those remedies which meet the threshold criteria, EPA then evaluates seven balancing criteria: long-term effectiveness; reduction of toxicity, mobility and volume of hazardous constituents; short-term effectiveness; implementability; cost; community acceptance; and state/support agency acceptance.

Based upon EPA's evaluation and the information presented in this SB, EPA considers the releases to have been remediated appropriately and the threshold/balancing criteria to have been met achieving protection of human health and the environment.

Section 4: Corrective Action Objectives

EPA's Corrective Action Objectives for the specific environmental media at the Facility are the following:

1. Groundwater

EPA expects the final remedies to return usable groundwater to its maximum beneficial use within a timeframe that is reasonable given the particular circumstances of the project. For projects where aquifers are either currently used for water supply or have the potential to be used for water supply, EPA will use the National Primary Drinking Water Standard Maximum Contaminant Levels (MCLs) promulgated pursuant to Section 42 U.S.C. §§ 300f et seq. of the Safe Drinking Water Act and codified at 40 CFR Part 141. EPA's Corrective Action Objective for groundwater is:

a. Monitor and control exposure to the hazardous constituents remaining in the groundwater until the concentrations naturally attenuate and EPA's MCLs are achieved for each constituent (benzene, 1,1-dichloroethene, cis/trans 1,2-dichloroethene, trichloroethene, 1,1,1-trichloroethane, tetrachloroethene, and vinyl chloride).

2. Soil

Given that the current and reasonably anticipated future use of Facility is industrial and that Facility SWMU soils have met EPA's RSL for industrial use, EPA's Corrective Action Objective for soil is:

a. Prohibit future residential use based on industrial cleanup levels and current and future use risk exposure assumptions.

Section 5: Proposed Decision

EPA's proposed decision is to require the Facility to:

1. Monitor groundwater until EPA's MCLs are achieved for each constituent (benzene, 1,1-dichloroethene, cis/trans 1,2-dichloroethene, trichloroethene, 1,1,1-trichloroethane, tetrachloroethene, and vinyl chloride), and
2. Prohibit future residential use by complying with the current CG (commercial general) zoning established by Hampden Township, and
3. Continue to comply with the PADEP January 27, 1995 Consent Order and Agreement.

Section 6: 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

Section 7: Signature

EPA's review of available information indicates that there are no unaddressed releases of hazardous waste or hazardous constituents from the former Capitol Products Corporation facility located at 6034 Carlisle Pike (Route 11), Mechanicsburg, PA 17055. EPA's proposed decision for the Facility consists of natural attenuation with: 1) groundwater monitoring, 2) land and groundwater use restrictions, and 3) compliance with the Pennsylvania Department of Environmental Protection Consent Order and Agreement.

Date: _____ _____

John A. Armstead, Director
Land and Chemicals Division
US EPA, Region III

Index to Administrative Record

Environmental Priorities Initiative Preliminary Assessment, Science Applications International Corporation, September 29, 1989

Summary of Regional and Site Specific Environmental Conditions for the Capitol Products Corporation, CH2M HILL, March 1993

Site Investigations, PADEP letter, July 12, 1994

Consent Order and Agreement, Pennsylvania Department of Environmental Resources, Capitol Products Corporation, Olympic Realty & Development Corporation, January 27, 1995

Groundwater Monitoring (multiple dates), Leidos, Inc. May 1995-November 2018

Environmental Indicator Inspection Report – Baker, May 2009

Status Report, Former Capitol Products Corporation Site, Leidos, Inc. September 23, 2014

Site Characterization Report, UPS Freight Property, Arcadis, U.S., Inc. April 16, 2016

September 2016 Groundwater Monitoring, Leidos, Inc. April 4, 2017

Interpretation of Groundwater Flow Direction, Leidos, Inc. March 7, 2018

VISL Calculator Results, EPA December 2018