



Long-Term Stewardship Assessment Report

Electro-Therm Inc.

EPA ID #: MDD043375757

Denton, Maryland 21629

Assessment Date: February 27, 2019

Report Date: March 7, 2019

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: Electro-therm Inc. is a former facility located at 24562 Meeting House Road in Denton, MD (Property). The subject property is a 13.7-acre industrial property situated between Route 404 and Meetinghouse Road. Historical land use prior to 1988 included the manufacture of heating elements by Electro-Therm Inc., which had, at one time, been owned by Canadian Corporate Management Company, Ltd. (CCMC). A pump and treatment system was installed in 1988 for remediation of Volatile Organic Compounds (VOCs), primarily 1,1,1-trichloroethane and tetrachloroethene, present in shallow groundwater. The Property was transferred to FIL (US) Inc. on September 14, 1990. The Facility houses one building which has been historically used to manufacture heating elements.

Current Site Status: In August 2014, EPA issued the Final Decision and Response to Comments (FDRTC). The final remedy is Monitored Natural Attenuation and compliance with and maintenance of ICs. Controls include groundwater use restrictions, vapor intrusion restrictions and compliance with the EPA-approved groundwater monitoring program. The remedy is implemented through a UECA Environmental Covenant between USEPA and FIL (US) Inc. dated February 8, 2016 (Covenant). The groundwater pump and treat system was shut down in 2013. The Property is currently vacant with the last tenant leaving in 2011.

Long-term Stewardship Site Visit: On February 27, 2019, EPA conducted a long-term stewardship site visit with a FIL (US) Inc. representative to discuss and assess the status of the implemented remedies at the Property.

The attendees were:

| Name | Organization | Email Address | Phone No. |
|--------------|---------------|--|--------------|
| John Hopkins | EPA Region 3 | hopkins.john@epa.gov | 215-814-3437 |
| Ken Chorel | FIL (US) Inc. | kchorel@russelmetals.com | 905-819-7403 |

Institutional Controls (ICs) Status:

UECA Environmental Covenant: The Covenant is the method for implementing institutional controls required as a condition of the Statement of Basis and Final Decision. The following ICs apply to the former Electro-therm facility, shown on Figure 1:

Groundwater Use Restriction: Groundwater in the unconfined shallow aquifer at the Property shall not be used for any purpose other than the operation, maintenance, and monitoring activities required by MDE and/or EPA, and no new wells which draw water from the unconfined shallow aquifer shall be installed at the Property. The Property is vacant and there were no uses of groundwater at the time of the visit. No new wells have been drilled or installed at the Property.

Vapor Intrusion Restriction: The existing building (as shown on Figure 1) will be used for commercial and/or industrial use only. A vapor intrusion control system shall be installed in each new structure constructed above the contaminated groundwater plume within the unconfined shallow aquifer, or within 100 feet around the perimeter of the contaminated groundwater plume. The existing building has been vacant for over 5 years and there were no new structures observed at the time of the site visit.

Monitored Natural Attenuation: Under the current groundwater monitoring plan, sampling events occur every 2 years primarily for the presence of VOCs in the shallow unconfined aquifer. Six monitoring wells and three eductor (extraction) wells were last sampled in 2017. Groundwater concentrations at three of nine wells exceeded the Maximum Contaminant Level (MCL) of 5 µg/L for tetrachloroethene, with detected concentrations ranging from 8.5 µg/L to 64 µg/L. One well slightly exceeded the MCL of 200 µg/L for 1,1,1-trichloroethane with a concentration of 240 µg/L. Each of the four downgradient sentinel wells near the Property boundary have been non-detect for all VOCs since 2007. Therefore, the groundwater plume is considered stable and not migrating off-site. There is limited evidence of biodegradation of chlorinated solvents based on geochemical parameters observed in groundwater. However, other natural attenuation mechanisms such as dispersion and diffusion may be occurring. The next groundwater sampling event is scheduled for April 2019.

Financial Assurance: Financial Assurance is not required for this site.

Reporting Requirements/Compliance: FIL (US) Inc. submits groundwater monitoring reports every other year following each respective groundwater sampling event and is currently in compliance with restrictions required by the Covenant.

Mapping: The EPA facility website map is accurate and includes the 13.7-acre parcel. A downloadable geospatial PDF map is available on EPA’s corrective action facility webpage under the “Reports, Documents and Photographs” section, found [here](#).

Conclusions and Recommendations: EPA made minor recommendations to FIL (US) Inc. regarding maintenance of monitoring and eductor wells. No IC deficiencies were identified. EPA has determined that the final remedy is fully implemented with controls in place.

Attachments:

Figure 1: Aerial Map of Electro-therm Inc.

Picture 1: Vacant Building

Picture 2: Monitoring Well MW-5

Picture 3: Eductor Well EW6

Picture 4: Groundwater Pump and Treatment System

Figure 1: Aerial Map of Aerial Map of Electro-therm Inc.



Picture 1: Vacant Building



Picture 2: Monitoring Well MW-5



Picture 3: Eductor Well EW6



Picture 4: Groundwater Pump and Treatment System

