



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III

FINAL DECISION AND RESPONSE TO COMMENTS

CAPITOL PRODUCTS CORPORATION

6034 Carlisle Pike

Mechanicsburg, Pennsylvania

EPA ID NO. PAD 003 004 405

I. FINAL DECISION - 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

The United States Environmental Protection Agency (EPA) has determined that 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 will be the Final Remedy required for the Capitol Products Corporation facility located at 6034 Carlisle Pike, Mechanicsburg, Pennsylvania 17055 (Facility). This is based on our findings as detailed in the Statement of Basis (SB).

Because contamination will remain in the soil and groundwater at the Facility, EPA is requiring land and groundwater use restrictions and groundwater monitoring. The Final Remedy requirements are:

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.

II. PUBLIC COMMENT PERIOD

On March 25, 2019, EPA proposed a remedy of natural attenuation with: 1) groundwater monitoring, 2) land and groundwater use restrictions, and 3) compliance with a PADEP January 27, 1995 Consent Order and Agreement. Consistent with public participation provisions under the Resource Conservation and Recovery Act (RCRA), EPA requested comments from the public on the proposed remedy as described in the SB. The commencement of a thirty (30)-day public comment period was announced in *The Sentinel* newspaper and on the EPA Region III website.

III. RESPONSE TO COMMENTS

EPA received one comment on the proposal from Bonnell Aluminum (current company from spinoff of Capitol overseeing environmental responsibilities at the Facility). The comment and EPA's response to the comment are as follow.

*Comment: The Proposed Decision that is included in the Statement of Basis includes 3 items (as stated on Page 7, Section 5). The first of these items would require the facility*

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*to monitor groundwater until EPA's MCLs are achieved for the designated constituents. We are concerned that this requirement, as stated, might be read to preclude use of a site-specific, risk-based cleanup in compliance with the Pennsylvania Land Recycling and Environmental Remediation Standards Act (commonly known as Act 2) at some point in the future. Although the facility does not intend to enter the Act 2 program at this time, we would not want the EPA Final Decision to preclude that possibility in the future. We request that EPA modify the Proposed Decision to allow use of the Act 2 site-specific, risk-based standard to achieve closure as a potential alternative to the continuation of groundwater monitoring until EPA's MCLs are achieved.*

EPA Response: EPA does not propose to limit pursuit of alternative standards under either Act 2 or RCRA Corrective Action. EPA's proposed decision reflects the monitoring and groundwater cleanup requirements detailed in the PADEP January 27, 1995 Consent Order and Agreement. EPA's regulations, policies, and guidance allow for future alternative remedy proposals (subject to Public Notice) if Capitol chooses.

This Final Decision and Response to Comments does not prevent the Facility from requesting changes to the remedy or cleanup standards in the future.

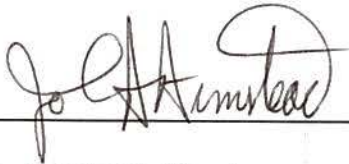
Based on the comment provided and the fact that EPA received no other comments from any other source, the remedy proposed in the SB should remain unchanged. Therefore, EPA selects monitored natural attenuation with land and groundwater use restrictions as described herein as the Final Remedy for the Facility.

#### IV. AUTHORITY

EPA is issuing this Final Decision under the authority of the Solid Waste Disposal Act, as amended by RCRA, and the Hazardous and Solid Waste Amendments (HSWA) of 1984, 42 U.S.C. Sections 6901 to 6992k.

#### V. DECLARATION

Based on the Administrative Record compiled for the Corrective Action at the Facility, EPA has determined that the Final Remedy selected in this Final Decision and Response to Comments is protective of human health and the environment.



John A. Armstead, Director  
Land, Chemicals & Redevelopment Division  
U.S EPA Region III

5.17.19

Date

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