



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

**SUBJECT:** Former Keystone Chemical Company  
Girardville, Schuylkill Co., PA  
RCRA ID: PAD000647735

**DATE:** 05/26/2020

Long-term Stewardship Assessment

**FROM:** Barbara Smith  
Project Manager (3LD10)

**TO:** Long Term Stewardship File for Keystone Chemical Co.  
RCRA Corrective Action Branch 2 (3LD20)

A handwritten signature in blue ink, appearing to read "Paul Gotchard".

**Remedy Review Summary:**

**EPA's Final Decision (9/28/2012) required Keystone Chemical Company to record an environmental covenant prohibiting groundwater use for potable purposes and restricting an area on-site to non-residential use (unless it is demonstrated to EPA and PADEP that such use will not pose a threat to human health or the environment or adversely affect or interfere with the selected remedy, and EPA and PADEP provides prior written approval for such use). Annual compliance reporting to EPA is required. The covenant was recorded on 3/21/2014 at the Schuylkill County Recorder's Office. The Girard Estate is the current property owner and is in compliance with EPA's Final Decision/covenant restrictions. Engineering controls were not required, and the property is ready for reuse.**

**Document Review:**

The Girard Estate sent its 2019 Annual Report in a letter to EPA, dated 2/26,2019, that states, "...the Girard Estate is in compliance with the activity and use limitations described in Section 6 of its Environmental Covenant. The activity and use limitations are being abided by and no changes to the property have been made."

The most recent available aerial image of the Facility (12/2016, Google Earth) indicates that the Environmental Covenant Area appears vacant/unused with no evidence of any structures or development.

The Environmental Covenant is currently not listed on PA's Activity and Use Limitation website. The Covenant is available on EPA's Fact Sheet for the Facility along with EPA's Statement of Basis for Final Remedy. The attached Table identifies covenant restrictions. The Covenant applies to the lined area in the figure below, called the 'Environmental Covenant Area.'



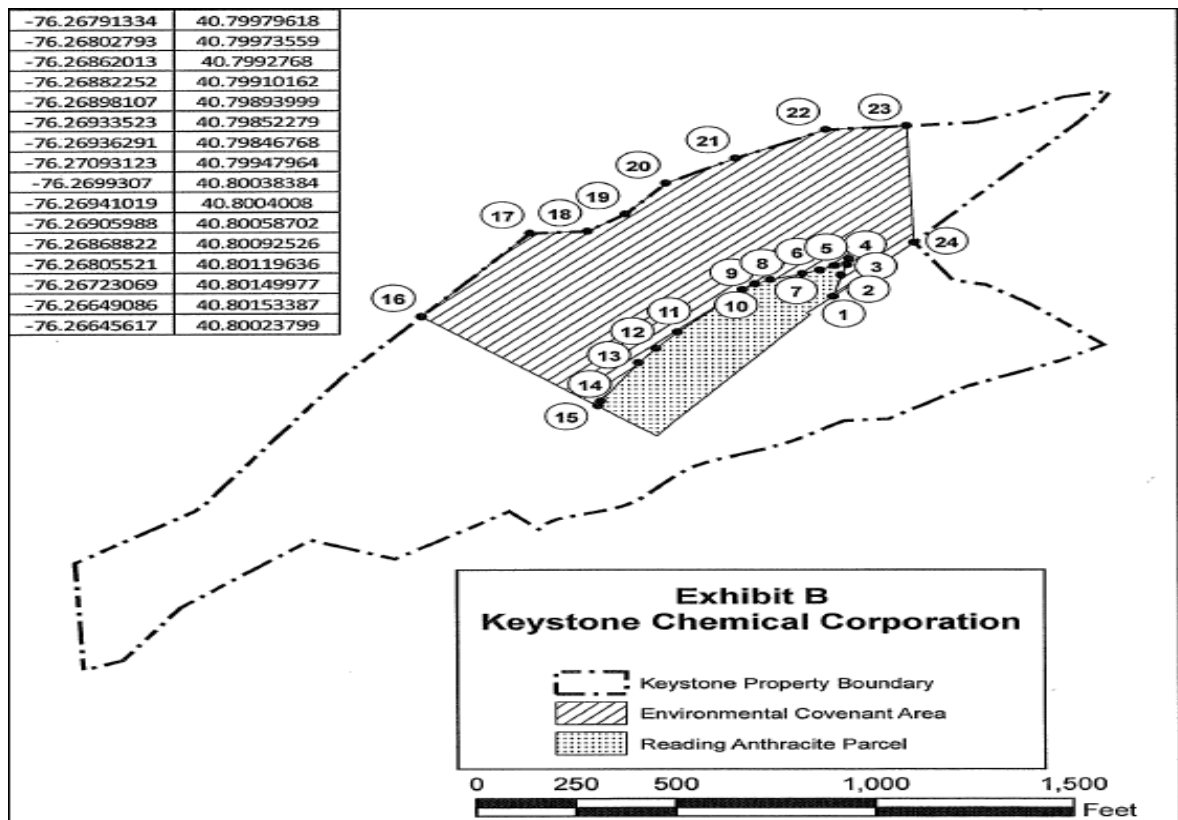
**Background:**

The 50-acre property is unused/vacant and is currently owned by the City of Philadelphia, Trustee Under the Will of Stephen Girard, Deceased, Acting By the Board of Directors of City Trust. The site is located northwest of Girardville in a coal extraction region and was used for coal refuse disposal until the early 1970's when it was mined for coal. From 1978 to 1985, the Facility was used intermittently for waste oil recovery/hazardous waste treatment and disposal operations. Hazardous waste was disposed of in an on-site impoundment and was contaminated primarily with heavy metals. PADEP ordered operations to cease in 1982, 1984 and permanently in 1986, following inspections identifying several violations of hazardous waste regulations. Closure activities were conducted from 1988 to 1991, where impoundment wastes and operational structures (ASTs, underground witness tanks and piping) were removed from the site. PADEP considered the Facility Clean Closed in 1993. In a site visit in 2011, EPA noted no evidence of releases at SWMUs and areas of concern.

Investigations showed that Facility operations did not impact groundwater, and dissolved iron, manganese and sulfate levels were attributable to upgradient acid mine drainage impacts. Soil samples from the Facility did not exceed PA's non-residential Statewide Health Standards (SHSs). However, because low level contaminants in soil and shallow groundwater were above levels for unrestricted use, EPA required land and groundwater use restrictions at a portion of the Site in a recorded environmental covenant.

**Documents Reviewed:**

Keystone Chemical Company EPA Fact Sheet, which includes:  
EPA Statement of Basis for Remedy (8/2012), Final Decision and Response to Comments (9/28/2012),  
Environmental Covenant, recorded 3/21/2014,  
2019 Annual Compliance Report to EPA from the Girard Estate, dated 2/26/2019,  
Facility boundaries and Covenant area mapped 9/30/2017.  
Google Earth image, 12/2016.



Institutional Control/Engineering Control  
 Corrective Action Remedy Summary

Facility Name	Keystone Chemical Company			
Address	Rapp Road, Girardville, PA 17935			
EPA ID Number	PAD000647735			
Are there restrictions or controls that address:	Yes	No	Area(s)	Description of restrictions, controls and mechanism
Groundwater Use	X		Environmental Covenant Area	GW shall not be used for any purpose other than conducting monitoring unless demonstrated to EPA & DEP that use will not pose a threat to human health or the environment.
Residential Use	X		Environmental Covenant Area	Property shall not be used for residential use unless demonstrated to EPA & DEP that use will not pose a threat to human health or the environment.
Excavation		X		
Vapor Intrusion		X		
Capped Area(s)		X		
Other Engineering Controls		X		
Other Restrictions	X		Environmental Covenant Area	Annual Reporting to EPA on compliance with Covenant. Approval of land use changes must receive prior approval by EPA and PADEP.