



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

SUBJECT: Koppers Inc. Facility
50 Koppers Lane, Montgomery, Lycoming Co., PA
RCRA ID: PAD056723265

DATE: 10/16/2020

Long-term Stewardship Assessment

FROM: Barbara Smith, Project Manager (3LD10)

TO: Long Term Stewardship File for Koppers Inc. Facility
RCRA Corrective Action Branch 2 (3LD20)

A handwritten signature in black ink, appearing to be "Barbara Smith", written over the "TO:" line of the email header.

Remedy Review Summary:

EPA's Final Remedy Decision (9/24/2013) is construction complete with controls for the Koppers Inc. Facility, now known as Beazer East, Inc., located in Montgomery Borough, Lycoming County, PA. The environmental covenant (EC) requires that the integrity of the engineered control be maintained. The engineered control is a gravel covering over a 1,000 square feet (approx.) area of soil with SVOC contamination. Facility property is to remain non-residential. EPA has determined that the property is in compliance with EPA's remedy decision. The property is ready for reuse.

Document Review:

The most recent aerial image of the Facility (Google) shows that the 109-acre property appears to be an active industrial operation. The 1,000 square feet (approx.) area covered with two inches of gravel (Gravel Cover Area) cannot be seen in detail but generally appears to be undisturbed. The environmental covenant (EC) for the property was recorded on 9/20/2013 and is available on PA's Activity and Use Registry. The Facility reported to EPA on 12/11/2019 that they are in compliance with the EC, as part of their annually requirement. Koppers, Inc. is listed in the covenant as the owner/grantor and Beazer East, Inc. is the holder/grantee. Covenant restrictions are summarized on page 3, below. The Gravel Cover Area is shown in the Figure below.

Background:

Koppers Company Inc., (Koppers) now known as Beazer East, Inc., constructed the Facility in 1971 for pressure treating railroad ties, bridge timbers, switch ties and crossing panels using creosote and other chemicals. The property was originally 164 acres but Koppers sold approximately 56 acres in 1989 that were historically used only for agriculture. The remaining 109 acres comprise the Facility, which continues pressure treating operations. Starting in the 1980's several environmental investigations and remedial activities were completed under PADEP and EPA direction. A RCRA Facility Assessment in

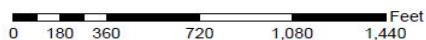
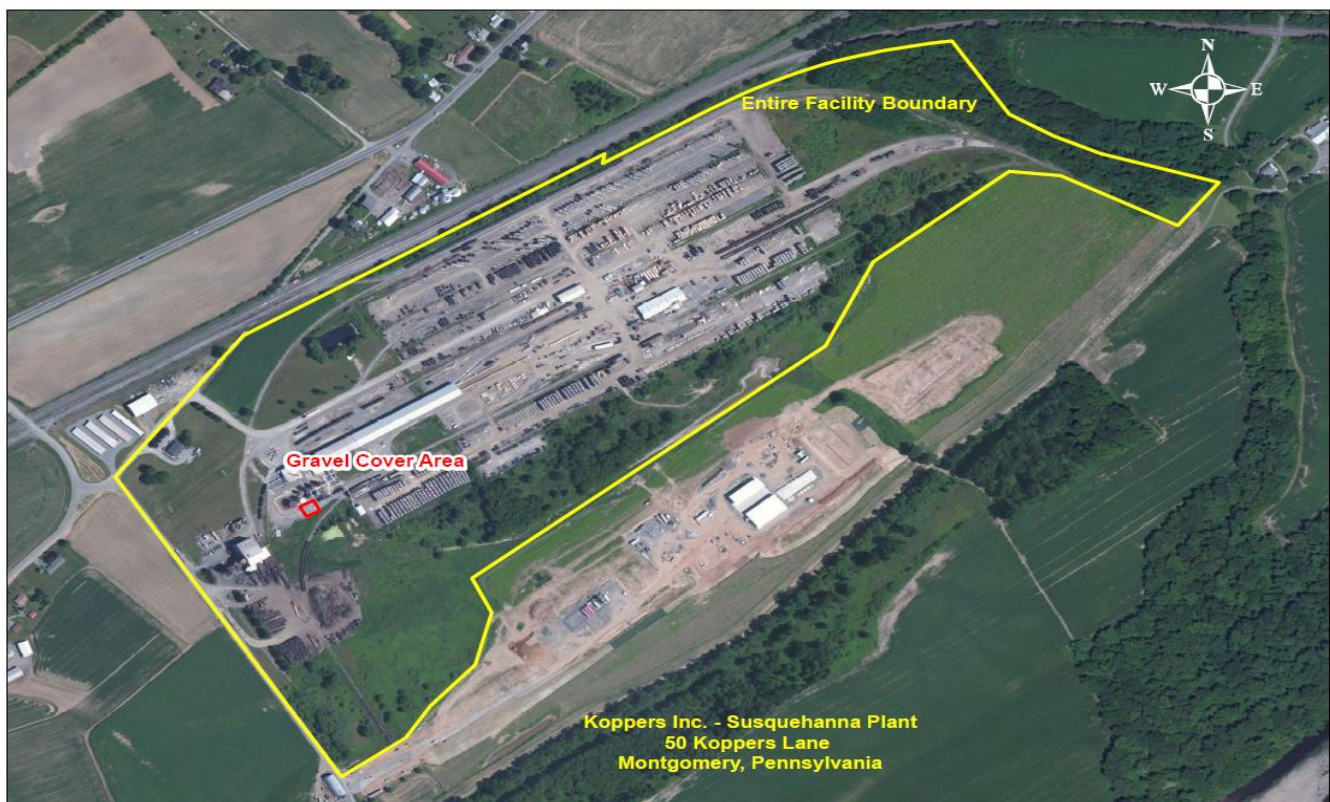


1986 identified 8 SWMUs and later, one AOC on-site. Four SWMUs were found to need no further action. Four SWMUs and the AOC required Corrective Action and were completed at the following units: Former Container Storage Area, Former Surface Impoundments, Former Spray Irrigation Field and Drip Tracks I and II and the Creosote Uploading Area, where a gravel cover (two inches thick) was installed over an approximately 1,000 sq. ft. area of soil with elevated SVOCs. Contaminated soil and sludge were removed from the following units: (1) three former surface impoundments (2,300 tons of clay sludge liner and subsoils); (2) Drip Tracks I and II (10,000 tons of visibly contaminated soil) during concrete liner construction; and (3) Creosote Uploading Area/hazardous waste storage area - soil potentially contaminated by creosote drippings removed during construction of concrete containment for HW Storage area and paving of railcar uploading area. All units received clean closure by PADEP.

Investigations and post remedial actions found that only surface soil in the former hazardous waste storage area/creosote unloading area/tank farm area posed a risk to on-site workers and potential construction workers by direct contact with soil containing SVOCs exceeding PADEP's direct contact cleanup standard and EPA's standard. The gravel cover prevents worker exposure, but the hypothetical future construction worker could potentially be exposed, but the risk is not considered significant due to limited exposure. Groundwater meets MCLs and is used as a source for process water and tap water. Employees are provided bottled water for drinking water because the groundwater is not chlorinated.

Documents Reviewed:

EPA Facility Fact Sheet, which includes EPA Statement of Basis, Environmental Indicator Forms and Facility boundary and covenant areas; Koppers Inc. Environmental Covenant (filed 9/20/2013); UECA Compliance Letter to EPA dated 12/11/2019; Google Earth Pro™ images; EPA's RCRAInfo database.



Institutional Control/Engineering Control Corrective Action Remedy Summary

Facility Name	Koppers Inc.			
Address	50 Koppers Lane, Montgomery, Lycoming County, PA			
EPA ID Number	PAD056723265			
Are there restrictions or controls that address:	Yes	No	Area(s)	Description of restrictions, controls and mechanism
Groundwater Use	X		Entire Facility (109-acres)	Restricted to industrial/commercial use, monitoring, testing or as otherwise approved by EPA.
Residential Use	X		Entire Facility (109-acres)	Property is restricted to non-residential uses.
Excavation	X		Gravel Cover Area	Maintain to 2" depth, no excavation without EPA written permission, emergency disturbance/repair reported to EPA within 15 days.
Vapor Intrusion		X		
Capped Area(s)	X		Gravel Cover Area	Maintain to 2" depth, no excavation without EPA written permission, emergency disturbance/repair reported to EPA within 15 days.
Other Engineering Controls		X		
Other Restrictions	X		Entire Facility	Annual reporting to EPA, EPA access to property, and notify EPA of foreclosure/judicial action within 7 days.