



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III

841 Chestnut Building
Philadelphia, Pennsylvania 19107-4431

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

SEP 23 1997

Mr. I. Norman Gerlach, R.A.
Vice-President
Fulton Financial Corporation
P.O. Box 4887
Lancaster, PA 17604

Dear Mr. Gerlach:

This letter serves to summarize our discussion of September 17, 1997. EPA concurs with comments from Fulton in the reconsideration of the proposed remedy described on the original Statement of Basis, dated September 28, 1995. This letter replaces EPA's Statement of Basis document and constitutes the final response to all comments to EPA from Fulton, its contractors, and its representatives. Further, EPA and Fulton now agree on the following five steps, which Fulton intends to implement voluntarily.

1. Fulton shall attempt bioremediation. This methodology was proposed by Fulton in a report dated June, 1997.
2. Fulton shall conduct annual groundwater sampling (i.e., at M-4, M-5, M-6, M-9, M-10, and sump) for VOC constituents.
3. Fulton shall submit a report to EPA annually on the analytical results from the groundwater sampling event.
4. Fulton shall continue to operate the pump and treat operation at the sump and to properly maintain the GAC filter.
5. Fulton may abandon monitoring wells M-11, and M-12 per PA DEP well abandonment procedures. However, should Fulton decide not to abandon these wells, annual sampling from these wells shall be conducted by Fulton.

Groundwater sampling as described in item 2, above, shall take place in March of each year, with a 2 week notice to EPA prior to sampling, so that EPA is able to co-ordinate split sampling of groundwater with Fulton.

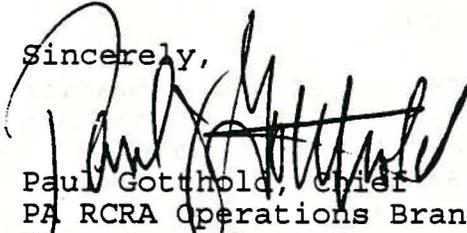
Nothing in this letter shall prevent EPA from requiring additional action should site conditions change. Such circumstances are unlikely, but additional action may be dictated for example when unexpected migration of the plume takes place.



Unless otherwise specified, Fulton shall properly abandon all remaining monitoring wells and piezometers when EPA terminates the existing Consent Order. EPA shall terminate the existing Consent Order when it can be repeatedly demonstrated by two consecutive sampling events that the entire contaminant plume no longer exists at above the following clean-up levels: TCE at 5 ppb (MCL); Vinyl Chloride at 2 ppb (MCL); and, 1,2-DCE at 55 ppb (10⁻⁶ Health Based Number).

If there are any questions concerning this letter, please do not hesitate to contact me at (215)566-3410, or Mr. Kai Hon Shum at (215) 566-3414.

Sincerely,



Paul Gotthold, Chief
PA RCRA Operations Branch
Hazardous Waste Management Division

cc: Kai Hon Shum (3HW80)
Lawrence Bass (3RC33)



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FEB 22 1996

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RETURN RECEIPT REQUESTED

Mr. I. Norman Gerlach, R.A.
Vice-President
Fulton Financial Corporation
P.O. Box 4887
Lancaster, PA 17604

Re: Fulton Facility located at 1695 State Street, East
Petersburg, Pennsylvania.

Dear Mr. Gerlach:

On September 29, 1995, the Environmental Protection Agency (EPA) issued a Statement of Basis for public comment that proposed corrective measures for the remaining groundwater contamination at the Fulton Financial Realty Company's East Petersburg property. Our preferred remedy was based on the approved Corrective Measures Study Report of April 19, 1995. In this report, Fulton had proposed installing and operating a groundwater recovery and treatment system to manage the contamination at the property.

During the public comment period for remedy selection, Fulton and its contractors, R.E. Wright Environmental, submitted new data that suggested that the level of contamination in the groundwater had decreased dramatically since the submission of the April 18, 1995 Report.

As discussed on the telephone with you on February 12, 1996, EPA believes that it is necessary to confirm the accuracy of Fulton's recent findings. Our goal is to determine if these sample results indicate a change in the level of contamination. To reach this goal, EPA hereby requests that Fulton submit a plan to collect and analyze groundwater samples from each monitoring well at the property for a period of one year. These samples should be collected every 90 days for four consecutive quarters. Samples must be collected and analyzed in accordance with the approved Quality Assurance Plan contained in the December 1991 RCRA Facility Investigation Report.

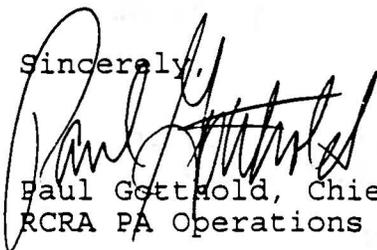
EPA will provide written approval of the sampling plan and will be prepared to split samples with your contractor. During this monitoring period, EPA will defer any final decision on implementation of additional corrective measures. While EPA's clean-up goal will remain the same, (i.e. the Maximum Contaminant Levels, MCLs), we agree with Fulton's comment that the

dramatically lower contamination levels found in the most recent results may not warrant additional measures, and that groundwater clean-up goals could be achieved through passive means.

Please respond to our request for additional sampling within thirty days of receipt of this letter. Your response should include a proposed sampling schedule and a list of the volatile organic compounds for analyses.

If you have any questions concerning this letter, please contact me at (215) 597-7937, or Mr. Kai Hon Shum, the Project Manager at (215) 597-2381.

Sincerely,



Paul Gottbold, Chief
RCRA PA Operations Branch

c: Kai Hon Shum (3HW80)
Lawrence Bass (3RC33)
Tom Hanlon, PADEP