P&T Transition to MNA

Hellertown
Manufacturing
Company
Hellertown, PA
Dates: 2016–2017

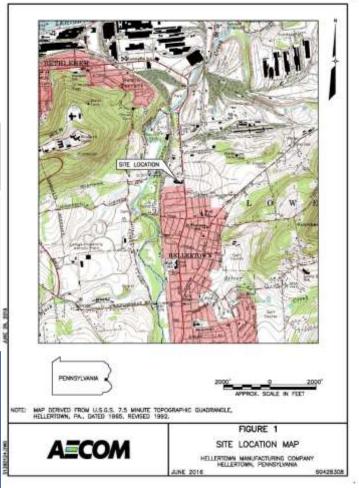
<u>Risk Scenario:</u> Unacceptable risks to human health and the environment from contaminated soil and groundwater at the site.

Contaminants of Concern

Groundwater: benzene, PCE, TCE, VC, cis-1,2-DCE, and trans-1,2-DCE.
Lagoon soil: TCE, PCE, 1,2-DCE, PAHs, 4-methyl-2-pentanone, carbon disulfide, ethylbenzene, xylenes (total), chromium, cyanide (total), and cadmium.

Remedial Approach

Placement of an impermeable cover over the entire former lagoon area; surface water runoff controls; extraction and treatment of groundwater (air stripping and solids removal), with discharge to Saucon Creek; long-term groundwater monitoring; deed restrictions.



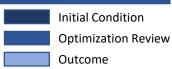
Performance evaluation summary—The groundwater treatment plant operations shut down in January 2013 when the system piping, and possibly the process equipment, was damaged by harsh winter conditions. The system would require substantial repair before any future use.

The remedial technology likely to replace P&T is MNA.

Lines of evidence used to support transition:

- 1. The remedy for the site is protective of human health and the environment, exposure pathways that could result in unacceptable risks are being controlled.
- 2. Remaining concentrations of COCs were decreasing, and pumping was extracting groundwater below MCL. Statistical analysis results suggested 75% of wells could be abandoned.
- 3. The placement of the impermeable cover over the former lagoon area continues to protect on-site receptors from direct exposure to site contaminants and retards the downward migration of soil contaminants to the overburden, shallow bedrock, and deep bedrock aquifers.
- 4. ICs, in the form of an environmental covenant that has been filed with the deed to the property, are in-place and prohibit any activity that would interfere with the installed cap remedy. The cap prevents contamination migration to the groundwater, enabling transition to MNA.

Transition technology decision expected to be codified in a decision document .

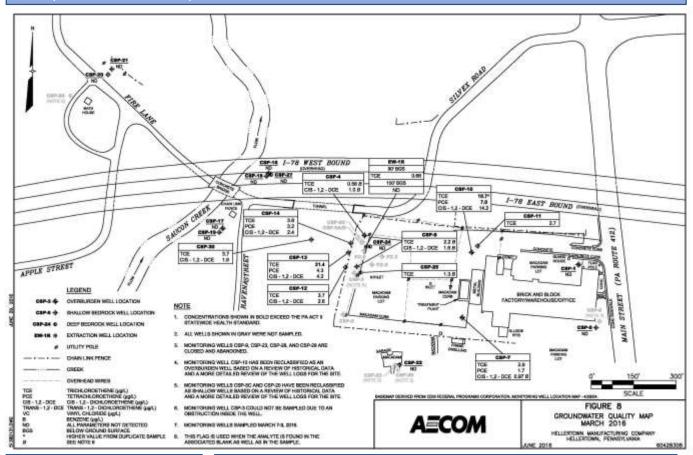


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P&T transition recommended due to P&T storm damage and subsequent optimization recommendation to pursue MNA. Approximately 75% of the wells have been closed out per statistical analysis. Six wells remain for monitoring. Continued monitoring to ensure continued downward trends in two remaining wells with levels currently approaching MCL of the only remaining contaminant, TCE. Site is planned for redevelopment.



Brief snippet on regulator approval to decommission the P&T forever: This CERCLA O&M site is operated and maintained by the State of Pennsylvania. Prospective developer working with the state.

P&T Transition Conclusion:

P&T transitioned to MNA

O&M cost savings: ~\$120,000/year

Remedy effectiveness and/or risk reduction improvement: Only two wells above MCL; expectation of reaching MCL within the 40-year time frame estimated in the ROD.

Resiliency benefits: system no longer susceptible to freezing damage.