

Long-Term Stewardship Checklist
 BAE Systems, 1100 Bairs Rd, York PA 17408
 EPA web fact sheet: <http://www.epa.gov/reg3wcmd/ca/pa/webpages/pad003025418.html>

A. Pre-Inspection Items

Prior to the site visit, the following pertinent documents were reviewed to ensure remedial components are adequate and up to date:

1. 9/25/91 Corrective Action (CA) Permit
2. 4/1/05 Statement of Basis (SB)
3. 3/6/06 Final Decision and Response to Comments (FDRTC)
4. 3/6/06 CA Permit Modification
5. 9/13/06 Hazardous Waste Facility Post-Closure Permit
6. 3/27/07 National Pollutant Discharge Elimination System (NPDES) Permit
7. 2012 Comprehensive Monitoring Evaluation Inspection
8. May 2013 Operations and Maintenance Summary Report for the Groundwater Remediation Systems

In addition, financial assurance status of the facility was confirmed with PADEP; EPA factsheets, links, and mapping documents were reviewed and updated; a site visit was coordinated with the facility and PADEP; and a meeting with West Manchester Township officials was scheduled to follow the site visit.

B. Site visit

1. Attendees

Name	Affiliation	Phone
Griff Miller	EPA	215-814-3407
Joel Hennessy	EPA	215-814-3390
Andrea Barbieri	EPA	215-814-3374
Pam Trowbridge	PADEP	717-705-4839
Lisa Wilt	PADEP	717-705-4910
Paul Lagowski	BAE	717-225-8059
Steve Douglass	BAE	717-524-0616
George Rodenburg	BAE	717-225-7062
Bob Errera	BAE	717-524-0531
Fred Wise	BAE	717-818-8830
Emily Wade	Leidos	717-425-8894

2. Introduction and purpose of visit

3. File review

Does the facility have a copy of:

- | | |
|--------------------------|--|
| a. 4/1/05 SB? | Y <input checked="" type="checkbox"/> N <input type="checkbox"/> comments: |
| b. 3/6/06 FDRTC? | Y <input checked="" type="checkbox"/> N <input type="checkbox"/> comments: |
| c. 9/25/91 CA permit? | Y <input checked="" type="checkbox"/> N <input type="checkbox"/> comments: |
| d. 3/6/06 CA permit mod? | Y <input checked="" type="checkbox"/> N <input type="checkbox"/> comments: |

- e. Current NPDES permit? Y ___ N x comments: *permit has expired but renewal not yet issued*
- f. Current post-closure permit? Y x N ___ comments:
- g. Inspections of MTR Landfill and any other documentation required as part of post-closure permit? Y x N ___ comments:
- h. Deed with notice of use restriction? Y x N ___ comments: *4/3/07 covenant, recorded 5/17/07 with York County*

4. Site walk

- a. Assess locations (IAW geospatial .pdf) and conditions of WWHS components:
 - 1. Air stripper, piping, outfall, and other treatment components: *only GAC treatment at WWHS (no air stripper); components and building in good condition*
 - 2. Well network

Well	Location	Condition
MW20S	<i>Accurate</i>	<i>Good</i>
PW2 (pumping? y/n)	<i>Accurate</i>	<i>Good; pumping</i>
MW13S	<i>Accurate</i>	<i>Good</i>
MW13I	<i>Accurate</i>	<i>Good</i>
PW4 (pumping? y/n)	<i>Accurate</i>	<i>Good; pumping</i>
MW36	<i>Accurate</i>	<i>Good</i>
PW1 (pumping? y/n)	<i>Accurate</i>	<i>Good; pumping</i>
MW17S	<i>Accurate</i>	<i>Good</i>

- b. Assess location (IAW geospatial .pdf) and condition of MTR Landfill
 - 1. Cap integrity: *evidence of burrowing near southeastern border of landfill; trap had been set outside burrow*
 - 2. Adequate vegetation: *excellent!*
 - 3. Well network

Well	Location	Condition
MW16	<i>Did not visit</i>	<i>Did not visit</i>
MW55	<i>Accurate</i>	<i>Good</i>
MW1	<i>Accurate</i>	<i>Good</i>
MW9	<i>Accurate</i>	<i>Good</i>
MW2A	<i>Accurate</i>	<i>Good</i>

- c. Assess locations (IAW geospatial .pdf) and conditions of EPBA components:
 - 1. Air stripper, piping, outfall, and other treatment components: *treatment building and components in good condition*
 - 2. Well network

Well	Location	Condition
MW21	<i>Accurate</i>	<i>Good</i>
MW45 (pumping? y/n)	<i>Accurate</i>	<i>Good; pumping</i>
MW37	<i>Accurate</i>	<i>Good</i>
MW47 (pumping? y/n)	<i>Accurate</i>	<i>Good; pumping</i>
MW48 (pumping? y/n)	<i>Accurate</i>	<i>Good; pumping</i>
MW43	<i>Accurate</i>	<i>Good</i>
MW19S	<i>Did not visit</i>	<i>Did not visit</i>

MW49 (pumping? y/n)	<i>Did not visit</i>	<i>Did not visit; pumping</i>
MW39	<i>Did not visit</i>	<i>Did not visit</i>

5. Questions, discussion, and wrap-up

- a. Final remedy for CA doesn't appear to include MTR Landfill at all – should it? *Final remedy decision should have mentioned landfill and post-closure requirements for completeness; however, post-closure requirements and inspections are up-to-date and being maintained by PADEP so there's little risk that this landfill will go ignored.*
- b. May wells that aren't part of monitoring program(s) be decommissioned? *Yes, and EPA/PADEP would prefer if these unused wells were decommissioned. Facility expects to implement a progressive decommissioning program in 2015.*
- c. Since NPDES permit covers GW treatment systems and post-closure permit covers MTR Landfill, is the CA permit necessary? *Since neither of these state-run programs have CA authority, the CA permit is still technically required in order to enforce Corrective Action requirements.*
- d. Considering the length of time of groundwater recovery/treatment (began in early '90s) and the low amounts of VOCs recovered annually, are there more feasible remedial options moving forward? *Facility's consultant will analyze feasibility of different/more appropriate remedial options and work with EPA/PADEP to determine implementability.*
- e. Are there any local ordinances that also put restrictions on GW use in the area? Any land use restrictions other than zoning? *BAE personnel believed that there is some type of ordinance requiring hookup to public utilities (i.e., water and sewer) within a certain radius of access to these utilities. According to township officials, residents near the facility rely on private groundwater wells for water, and no resource restrictions other than zoning exist near the facility.*
- f. The CA permit expires March 6, 2016. Does the facility need to submit a renewal application? *EPA does not expect that a renewal application from the facility will be necessary. EPA will determine the need to renew or modify the CA permit prior to expiration based on the present remedy's performance and/or any proposed changes to the remedy (see B.5.d., above).*

6. West Manchester Township visit

a. Attendees

Name	Affiliation	Phone
Griff Miller	EPA	215-814-3407
Joel Hennessy	EPA	215-814-3390
Andrea Barbieri	EPA	215-814-3374
Kelly Kelch	Township manager	717-792-3505
Monica Love	Township zoning officer	717-792-3505
Zane Williams	Township stormwater officer	717-792-3505

b. Summary of discussion

EPA briefed Township officials on the importance of keeping track of the long-term obligations of facilities in their area and of EPA's efforts in developing tools that can help in this regard (e.g., mapping of institutional and engineering controls, use of environmental covenants, periodic LTS visits). After EPA described the components of BAE's remedy, EPA's question (B.5.e., above) and any Township questions were addressed. One Township issue

regarding stormwater runoff from the facility impacting downgradient neighbors has yet to be resolved but has been referred to the PADEP NPDES program. EPA also notified the facility of this issue. (Note: Subsequent to this visit, the facility informed EPA that the facility is working to resolve this issue in cooperation with the Township and affected parties.)