

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION III

## 1650 Arch Street Philadelphia, Pennsylvania 19103-2029

JUL 20 2017

Mr. Glen Foster Director, Global Environmental TE Connectivity MS 38-34 P.O. Box 3608 Harrisburg, Pennsylvania 17105-3608

RE: Termination of the Final Administrative Order on Consent (AOC) U.S. EPA Docket No. RCRA-III-032-CA Former TE Connectivity facility (Site), Glen Rock, PA

Dear Mr. Foster:

On January 22, 1991, the United States Environmental Protection Agency (EPA) and the Respondent, TE Connectivity (TEC) entered into the above-referenced AOC that required TEC to implement the Corrective Measures selected by EPA in the 1991 RCRA Record of Decision (ROD). EPA's selected Corrective Measures entailed contaminant source removal and groundwater remediation to continue until the cleanup goals were attained at the point of compliance (POC) wells.

The RCRA ROD acknowledges that due to the elevated concentrations of the constituents of concern (COCs) and the kinetics of chemical and physical desorption of contaminants in groundwater, it may be technically impossible to attain the cleanup goals of the Maximum Contaminant Levels (MCLs) throughout the groundwater plume. Therefore, the RCRA ROD states that if the concentrations of 1,1,2-trichloroethane (1,1,1-TCA), trichloroethylene (TCE), and 1,1,2-trichloroethane (1,1,2-TCA) in groundwater remain stable after a minimum of five (5) years of groundwater remediation, TEC may petition EPA to revise the cleanup goals.

In August 2015, TEC submitted a petition to EPA to revise the cleanup goals for 1,1,2-TCA from 5  $\mu$ g/L to 27.5  $\mu$ g/L and for vinyl chloride (VC) from 0.2  $\mu$ g/L to the MCL of 2.0  $\mu$ g/L. The revised cleanup goals are based on a sitewide groundwater study that demonstrated that the levels of COCs in groundwater have stablized and do not impact groundwater quality downgradient of the Site. Furthermore, the study determined that the existing groundwater plume does not pose an exposure pathway to human and environmental receptors. EPA concurred with the conclusion of the groundwater study, and on October 13, 2015, EPA approved TEC's petition to revise the cleanup goals for 1,1,2-TCA and VC.

On January 27, 2017, EPA issued an Explanation of Significant Differences (ESD) that modified the 1991 RCRA ROD Corrective Measures to reflect the revised groundwater cleanup goals. The ESD required the implementation of institutional controls that restrict groundwater and land use at the Site. On January 30, 2017, TEC executed an environmental covenant pursuant to the Pennsylvania Uniform Environmental Covenants Act, 27 Pa. C.S. Sections 6501-6517, (UECA) with the York County Recorder of Deeds that imposes the required institutional controls.

Under the conditions set forth in the AOC, the EPA has determined that TEC has demonstrated, to the satisfaction of EPA, that the terms of the AOC, including any additional tasks determined by EPA to be required pursuant to the AOC, have been satisfactorily completed. Therefore, under the terms set forth in Section XXIV of the AOC, EFFECTIVE DATE AND TERMINATION, the AOC is hereby terminated. The termination of the AOC shall not, however, terminate TEC's obligation to comply under the AOC Section XI ("RECORD PRESERVATION"), Section XVI ("RESERVATION OF RIGHTS") and Section XVIII ("OTHER APPLICABLE LAWS").

If you have any questions regarding this letter, please do not hesitate to contact Khai M. Dao, the assigned EPA Project Manager, at 215-814-5467.

Sincerely,

Catherine A. Libertz, Acting Director

Land and Chemicals Division

cc: Paul Gotthold (EPA) Khai M. Dao (EPA) Jennifer Wilson (PADEP)