



UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
STATEMENT OF BASIS  
FORMER COLE OFFICE ENVIRONMENTS  
YORK, PENNSYLVANIA  
EPA ID NO. PAD052917846

## **I. Introduction**

The United States Environmental Protection Agency, Region III (“EPA”) has prepared this Statement of Basis (“SB”) to solicit public comment on its proposed remedy for the Former Cole Office Environments North Plant facility located at 1201 Eden Road (formerly 640 Whiteford Road), York, Pennsylvania 17402 (“Facility” or “Site”). EPA’s proposed remedy for the Facility consists of a combination of engineering controls (“ECs”) and institutional controls (“ICs”) which are designed to minimize the potential for human exposure to contamination.

The proposed remedy will eliminate contact with contaminated environmental media at the Facility and control the migration of contamination. The proposed remedy will also use institutional controls to protect the integrity of the remedy by limiting land and resource use at the entire Facility. EPA proposes to implement the final remedy for the Facility through an enforceable agreement, order, or Environmental Covenant pursuant to the Pennsylvania Uniform Environmental Covenants Act (“UECA”), Act No. 68 of 2007, 27 Pa. C.S. §§ 6501, *et seq.* Any environmental covenant will be recorded in the chain of title for the Facility property. This SB highlights key information relied upon by EPA in making its proposed remedy.

The Facility is subject to EPA’s Corrective Action Program under the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act (“RCRA”) of 1976, and the Hazardous and Solid Waste Amendments (“HSWA”) of 1984, 42 U.S.C. §§ 6901 *et seq.* (“Corrective Action Program”). The Corrective Action Program is designed to ensure that certain facilities subject to RCRA have investigated and cleaned up any releases of hazardous waste and hazardous constituents that have occurred at their property. The Commonwealth of Pennsylvania (“Commonwealth”) is not authorized for the Corrective Action Program under Section 3006 of RCRA. Therefore, EPA retains primary authority in the Commonwealth for the Corrective Action Program.

The Administrative Record (“AR”) for the Facility contains all documents, including data and quality assurance information, on which EPA’s proposed decision is based. See Section IX, Public Participation, for information on how you may review the AR.

## **II. Facility Background**

The Facility is located in Springettsbury Township in York County, near York, Pennsylvania. The property consists of approximately 21 acres and is surrounded by commercial and industrial properties. The Facility is bordered by Arsenal Road (Rt. 30) to the north; Harrisburg-Baltimore Expressway (Rt. 83) and Mill Creek (approximately 500 feet) to the south; Eden Road and industrial/commercial property to the west; and, industrial/commercial property to the east. An aerial photograph depicting the location of the Facility and a property diagram are attached to this SB as Figures 1 and 2, respectively.

In the early 1960s, Cole Division, Litton Corporation (“Litton”) purchased the Facility property which was undeveloped at that time. Construction of the Facility building began in 1965 with additions in 1967 and 1978. From the late 1960s up until 1989, the Facility was used for the fabrication of furniture parts and the assembly of office furniture. Operations included zinc, nickel and chromium electroplating, iron phosphatizing, and painting operations. Between

1989 and 1991, the building was vacant and the Facility was not used. From 1991 to 1993, a skid repair business operated in the western-most extension of the Facility. From 1990 to 1998, approximately 40,000 square feet of the Facility building was rented to Pfaltzgraff Company for use as a warehouse. Currently, the Facility is owned by Kinsley Properties, under K/G Whiteford Limited Partnership, and leased to Worthington Industries, Inc. and Graham Engineering Corporation. Future use of the Facility is anticipated to be for industrial and/or commercial purposes.

Litton submitted an original Notification of Hazardous Waste Activity on August 15, 1980 and received the RCRA EPA ID No. PAD052917846 on October 9, 1980. Litton then submitted a RCRA Hazardous Waste Part A Permit Application to EPA on November 19, 1980 for the treatment and storage of hazardous waste, and was granted interim status on December 29, 1980. Litton submitted a subsequent Notification of Hazardous Waste Activity to PADEP on May 31, 1983 withdrawing its Part A Permit Application and notifying as a generator of hazardous waste.

### **III. Summary of Environmental History**

Contamination was first discovered at the Facility in 1990 during a Phase II subsurface investigation conducted by R.E. Wright Associates, Inc. on behalf of Litton. Immediately following discovery of soils contamination, extensive soil and groundwater investigations were completed at the Site by Buchart-Horn, Inc. between 1991 and 1994, Geraghty & Miller between 1995 and 1997, and ARCADIS Geraghty & Miller between 1998 and 2000. Three Areas of Concern (“AOCs”) were identified during the soil and groundwater investigations: (1) the presence of chromium and nickel in soil and groundwater in the vicinity of the Former Nickel-Chrome Plating Area (“Former Plating Area”), (2) paint thinner constituents in soil near the Former Solvent Underground Storage Tank (“UST”) Area (“Former UST Area”), and (3) chlorinated volatile organic compounds (“VOCs”) in regional groundwater.

#### **A. Areas of Concern**

##### **1. Former Plating Area**

The Former Plating Area operated between 1968 and 1989. Chromium and nickel were dissolved in an acidic plating solution used in the electroplating process. In 1989, the plating operation ceased and the plating equipment was decommissioned and removed from the Site. In 1990, elevated concentrations of chromium (5,800 milligrams per kilogram [“mg/kg”]) and nickel (5,130 mg/kg) were detected in subsurface soils beneath the sump in the Former Plating Area (“Former Sump Area”). These contaminants are limited to the Former Sump Area and are wholly capped by the existing 10 inch thick concrete floor.

From 1990 to 2000, numerous soil and groundwater samples were collected in the vicinity of the Former Sump Area to characterize the extent of chromium and nickel contamination in the subsurface media. Soils and groundwater analytical data indicate that chromium and nickel concentrations in the Former Sump Area exceed both EPA Region 3 risk based screening levels (“RSL”) and Pennsylvania’s Department of Environmental Protection

("PADEP") Statewide Health Standards ("SHS") established for residential soil and groundwater.

Total chromium concentrations in soil under the Facility building range from 4.5 to 5,500 mg/kg and nickel ranges from non-detect to 5,130 mg/kg. A review of the historical soil data indicates higher concentrations of chromium and nickel are found in shallow soils near the Former Sump Area under the Facility building. Concentrations decrease with depth and horizontal distance from the Former Sump Area. The approximate area of soil containing chromium above 100 mg/kg, which is EPA's RSL and PADEP's SHS for non-residential soil, is estimated to be 8,300 square feet.

Groundwater samples collected from the monitoring wells installed in the area of soil with elevated chromium and nickel concentrations (i.e., P-1, DMW-1, MW-5, MW-6, GM-1S, and GM-1D) show P-1 to exhibit the highest concentrations of chromium and nickel. Chromium was detected in P-1 at concentrations of 1,400 milligrams per liter ("mg/L") total chromium (1,300 mg/L dissolved chromium) and 150 mg/L total nickel. A review of the chromium and nickel groundwater results indicates that these metals are found in groundwater in the immediate area of the Former Sump Area. Groundwater with concentrations of chromium above 0.1 mg/L does not extend beyond an area approximately 250 feet in diameter, and groundwater with concentrations of nickel above 0.1 mg/L does not extend beyond an area approximately 150 feet in diameter.

## **2. Former UST Area**

The Former UST Area consisted of two (2) 2,000-gallon and two (2) 6,000-gallon steel USTs used for the storage of solvents. These USTs were registered with PADEP as Tank Nos. 001, 002, 003 and 004. In October 1991, all four (4) USTs were excavated, cleaned and removed from the Site. The northwestern-most 6,000-gallon UST was observed to have visible holes on the bottom and both ends, and the other three (3) USTs were rusted and pitted. Stained soils were excavated from the southwestern end of the Former UST Area where the pipes were located, and these soils were shipped off-site for disposal.

In 1992, following removal of the USTs and visibly contaminated soils, ten (10) soil samples were collected from the soils located beneath the Former UST Area and analyzed for VOCs. Paint thinner constituents were found in the soil. Aromatic solvent compounds, primarily naphthalene, were detected in the samples resulting in additional soil sampling from six (6) soil borings and installation of one monitoring well (MW-7). Soils containing several non-chlorinated solvents, such as naphthalene, 1,2,4-trimethylbenzene, n-butylbenzene, were detected at concentrations greater than 0.1 mg/kg. However, groundwater analytical data from MW-7 showed that the paint thinner constituents found in soils were not present in the groundwater.

A remediation plan to install and operate a soil vapor extraction ("SVE") system to remediate the soils containing paint thinner constituents was approved by PADEP in September 1992. The SVE operated from the middle of 1993 through the early part of 1994. In 1996, following operation of the SVE, three (3) post-remediation soil samples were collected and

analyzed for VOCs. The analytical results of the post-remediation soil sampling showed that no VOCs were detected at concentrations above applicable EPA RSLs and PADEP SHSs for non-residential use.

### **3. Chlorinated VOCs in Regional Groundwater**

Since 1991, tetrachloroethene (“PCE”) and trichloroethene (“TCE”) have been detected above their respective Maximum Contaminant Levels (“MCLs”) promulgated at 40 C.F.R. Part 141 pursuant to Section 1412 of the Safe Drinking Water Act, 42 U.S.C. Section 300g-1, in groundwater from all monitoring wells across the Site, with the exception of the downgradient monitoring wells MW-2 and MW-4. However, PCE and TCE have historically not been used at the Facility and have not been detected in Facility soils.

Based on several EPA and PADEP studies, the source of PCE and TCE is the Harley-Davidson property, which is located north and hydraulically upgradient to the Facility. The PCE and TCE were first discovered in groundwater at the Harley-Davidson property in 1986. Since that time, numerous investigations have been conducted at the Harley-Davidson property. In 1997, R.E. Wright Environmental, Inc. conducted a study to determine groundwater flow directions and contaminant migration across the southern boundary of the Harley-Davidson property. The report, which is entitled the *Final Southern Property Boundary Area Interim Study Report*, concluded that PCE and TCE impacted groundwater at the Harley-Davidson property was migrating off-site across the eastern portion of the Harley-Davidson southern property boundary.

Harley-Davidson is addressing the VOC groundwater contamination relating to its property under EPA and PADEP oversight.

### **B. Summary of Remedial Investigations and Final Reports**

On July 6, 1997, in accordance with the provisions of PADEP’s Pennsylvania Land Recycling and Environmental Remediation Standards Act (“Act 2”), Litton submitted three (3) Notices of Intent to Remediate (“NIRs”) to PADEP for each of the AOCs described above, followed by submittal of a Remedial Investigation Report in September 1997. Final Reports were submitted and approved under Act 2 for each of the AOCs as follows:

- *Final Report, Attainment of Statewide Standards for Heavy Metals in Groundwater* submitted to PADEP on July 11, 2000 and approved on July 14, 2000.
- *Remedial Investigation and Site Specific Final Report for Heavy Metals in Soils* submitted to PADEP on July 14, 2000 and approved on October 12, 2000.
- *Final Report, Attainment of Background Standards for Volatile Organic Compounds in Groundwater* submitted to PADEP on July 10, 2000 and approved on July 14, 2000.
- *Site-Specific Remedial Investigation and Statewide Health and Site-Specific Standards Final Report for Paint Thinner Constituents in Soil* submitted to PADEP on December 13, 2000 and approved on December 14, 2000.

## **C. Evaluation of Exposure Pathways**

### **1. Heavy Metals in Soils and Groundwater**

Litton completed a preliminary Human Health and Ecological Risk Screening (“HHERS”) under Act 2 to determine whether the chromium and nickel soil and groundwater contamination pose an unacceptable risk to human health or the environment assuming industrial and/or commercial use of the Facility. The HHERS did not include an evaluation for residential use because the reasonable anticipated land use for the entire Facility is industrial and/or commercial. The exposure pathways assessed include direct contact with soil and direct contact with groundwater, in addition to potential impacts to ecological receptors. The soil to indoor air pathway and groundwater to indoor air pathway were not evaluated since the constituents of concern are metals which do not volatilize into the air.

The HHERS concluded that the potential for direct contact with contaminated soils and groundwater pathways do not exist because the impacted soil and groundwater are localized beneath the concrete slab floor under the Former Plating Area in the Facility building. It was also found that an impact to ecological receptors does not exist for the same reason. The concrete slab floor acts as a barrier (i.e., engineering control) to eliminate direct contact with contaminated soils and groundwater by humans and ecological receptors. In addition, the Facility does not use on-site groundwater and there are no groundwater users between the Site and Mill Creek or within a 0.5 mile radius of the Site. Potable water at the Facility and the surrounding area is serviced by the York Water Company.

As part of the HHERS, a fate and transport analysis (“FTA”) was conducted. The purpose of the FTA was to determine whether the on-site soil and groundwater concentrations of chromium and nickel pose a potential threat to off-site groundwater. The FTA evaluated (1) the migration of the constituents from the soil into the underlying groundwater, and (2) transport of the affected groundwater to the downgradient Facility property boundary.

The results of the FTA indicate that detectable concentrations of dissolved chromium and nickel in groundwater will not reach the Facility property boundary in the foreseeable future (i.e., within 30 years). EPA confirmed the results of the FTA through an EPA-lead sampling visit conducted in June 2011 at monitoring wells MW-2 and MW-12, which are located downgradient of the source area, and the Former Plating Area. Both chromium and nickel were non-detect in the groundwater sampled at monitoring wells MW-2 and MW-12. The results of EPA’s June 2011 groundwater sampling event can be found in the Administrative Record.

### **2. Paint Thinner Constituents in Soils**

The direct contact with soils and soil to indoor air exposure pathways were evaluated for contaminated soils located in the Former UST Area. EPA determined that both the direct contact with soils and soil to indoor air pathways do not pose a potential unacceptable human health risk based on the analytical results of the post-remediation soil sampling which showed that no VOCs were detected in soils at concentrations above applicable PADEP non-residential SHS or EPA RSLs. The direct contact with groundwater and groundwater to indoor air pathways were not

evaluated because paint thinner constituents were not present in the groundwater beneath the Former UST Area.

### 3. VOCs in Regional Groundwater

EPA determined that the direct contact with groundwater pathway via ingestion at the Facility does not exist because there are no groundwater users on-site or within a 0.5 mile radius of the Site. Drinking water at the Facility and the surrounding area is provided by the York Water Company, thereby eliminating a direct contact exposure pathway with groundwater through ingestion.

EPA evaluated the direct contact with groundwater pathway for construction/excavation workers via incidental ingestion, dermal absorption, and/or inhalation. EPA concluded, in the unlikely event that a construction/excavation worker was to come into contact with groundwater, the highest concentrations of PCE (110 microgram per liter (“ $\mu\text{g/L}$ ”)) and TCE (410  $\mu\text{g/L}$ ) historically detected in groundwater would not pose an unacceptable risk to the individual workers. Levels of 410  $\mu\text{g/L}$  of TCE are 250 times lower than EPA’s guideline of 100 mg/L for a non-carcinogenic effect. The level of 410  $\mu\text{g/L}$  is also below the Occupational Safety and Health Agency (“OSHA”) standard of 500  $\mu\text{g/L}$ , assuming all TCE volatilized.

The groundwater to indoor air pathway was evaluated by EPA using the information and data presented in the following reports:

- (1) *Indoor Vapor Pathway Screening Assessment – Supplemental RI Report – Harley Davidson Motor Company Operations, Inc., York, PA* report dated March 2005; and,
- (2) *Off-Site Vapor Intrusion Investigation Results – Harley-Davidson Motor Company Operations, Inc., York, PA – Langan Project No. 1406706* report dated January 28, 2008.

Langan Engineering & Environmental Services (Langan), on behalf of Harley-Davidson, performed a vapor intrusion investigation on and around the Harley Davidson property to determine whether or not the vapor intrusion pathway poses an unacceptable risk to human health. Both of the reports referenced above concluded that there is no apparent on-site or off-site risk to human health via the vapor intrusion pathway associated with the VOC groundwater contamination originating from the Harley-Davidson property.

Taking into consideration that the Facility is located approximately 1,800 feet south of the Harley-Davidson property, the Facility building was constructed without a basement, and the highest concentrations of PCE (110  $\mu\text{g/L}$ ) and TCE (410  $\mu\text{g/L}$ ) historically detected in groundwater at the Facility are substantially lower than the concentrations of PCE and TCE detected in groundwater at the Harley-Davidson property, EPA has determined that the groundwater to indoor air pathway does not pose a potential unacceptable human health risk at the Facility. Furthermore, recent groundwater sampling at the Facility in June 2011 showed the highest concentration of PCE and TCE detected beneath the Facility building was 26.4  $\mu\text{g/L}$  and 39.5  $\mu\text{g/L}$ , respectively, at monitoring well DMW-1.

The direct contact with soils and soil to indoor air exposure pathways were not evaluated because the VOCs detected in the groundwater beneath the Site have not been detected in any of the Facility soil samples collected from 1990 to the present.

#### **IV. Corrective Action Objectives**

EPA's overall Corrective Action Objectives for soils and groundwater at the Facility are to:

- (1) Control non-residential exposure to soils by maintaining the existing concrete floor slabs which eliminate the direct contact pathway. Institutional controls will be established to prevent residential use of the property without prior written approval from EPA or PADEP.
- (2) Prevent human exposure to heavy metal and VOC contaminants in groundwater beneath the Facility and to demonstrate that the heavy metal contaminant plume is not migrating or affecting off-site groundwater and/or nearby surface water.

#### **V. Proposed Remedy**

EPA's proposed remedy for the Facility consists of a combination of engineering controls ("ECs") and institutional controls ("ICs") which are designed to minimize the potential for human exposure to contamination.

##### **A. Engineering Controls**

EPA's proposed remedy for the Facility consists of the inspection, operation and maintenance of the already constructed concrete slab located above the soil contamination associated with the Former Plating Area. Because the soil contamination associated with the Former Plating Area is under a concrete slab, contact with contaminated soil is effectively eliminated and no migration is anticipated. The inspection, operation and maintenance of the EC will be required by the Environmental Covenant.

In addition, the Environmental Covenant will address earth moving activities at the Facility to ensure such activities will not pose a threat to human health (i.e., construction/excavation worker).

##### **B. Institutional Controls**

ICs are non-engineered mechanisms such as administrative and/or legal controls that minimize the potential for human exposure to contamination and protect the integrity of a remedy. Under this proposed remedy, contaminants remain in the Facility soils and groundwater beneath the Facility above levels appropriate for residential uses, but below levels appropriate for non-residential (industrial) uses. Because contaminants remain in the soil and groundwater at the Facility, EPA's proposed remedy requires that compliance with and maintenance of land or resource restrictions at the Facility be implemented through an enforceable agreement, order, or



Environmental Covenant with the following elements:

- 1) The Facility property shall be restricted to industrial purposes and not be used for residential purposes unless it is demonstrated to PADEP, in consultation with EPA, that such use will not pose a threat to human health or the environment or adversely affect or interfere with the selected remedy and PADEP, in consultation with EPA, provides prior written approval for such use.
- 2) Groundwater from beneath the Facility shall not be used for any purpose other than to conduct the operation, maintenance, and monitoring activities required by PADEP and/or EPA, unless it is demonstrated to PADEP, in consultation with EPA, that such use will not pose a threat to human health or the environment or adversely affect or interfere with the selected remedy and PADEP, in consultation with EPA, provides prior written approval for such use.
- 3) All earth moving activities in the soil contaminated by the Former Plating Area, including excavation, drilling and construction activities, shall be prohibited unless it is demonstrated to PADEP, in consultation with EPA, that such activity will not pose a threat to human health or the environment or adversely affect or interfere with the selected remedy and PADEP, in consultation with EPA, provides prior written approval for such use.
- 4) The property owner shall maintain the integrity and protectiveness of the existing concrete slab covering the soil contamination associated with the Former Plating Area. The property owner shall inspect that concrete slab on a biennial basis to ensure that the integrity and protectiveness of the slab is maintained and provide a report documenting the findings of the inspection to EPA and PADEP.
- 5) The property owner shall perform all activities at the Facility in accordance with an enforceable agreement, order or Environmental Covenant to maintain the integrity and protectiveness of the selected remedy unless it is demonstrated to PADEP, in consultation with EPA, that such activity will not pose a threat to human health or the environment or adversely affect or interfere with the selected remedy and PADEP, in consultation with EPA, provides prior written approval for such use.
- 6) The property owner shall evaluate compliance with ICs implemented for the Facility on a biennial basis and provide a report documenting the findings of the evaluation to EPA and PADEP.
- 7) The property owner shall provide surveys for: (1) the perimeter constituting the legal boundary of the Facility and (2) the soil contamination associated with the Former Plating Area. These two geographic areas represent separate polygons which shall be described and provided to EPA and PADEP in the following ways:
  - Survey description (metes & bounds); and,

- Longitude/latitude of vertices of each polygon (in decimal degrees to at least seven decimal places, using a World Geodetic System (“WGS”) 1984 datum, and indicating west longitude as a negative number).

In addition, to the above listed land or resource restrictions, Springettsbury Township ordinance (Article I Connection to System in Mt. Zion Water District) requires that any new building that is located within 150 feet of any public street or easement containing a public water main within the Mt. Zion Water District obtain a connection to the York Water Company and disconnect any on-lot wells except for specific non-potable uses.

## **VI. Evaluation of EPA’s Proposed Decision**

This section provides a description of the criteria EPA used to evaluate the proposed remedy consistent with EPA guidance. The criteria are applied in two phases. In the first phase, EPA evaluates three remedy threshold criteria as general goals. In the second phase, for those remedies which meet the threshold criteria, EPA then evaluates seven balancing criteria to determine which proposed remedy alternative provides the best relative combination of attributes.

### **A. Threshold Criteria**

#### **1. Protect Human Health and the Environment**

This proposed remedy protects human health and the environment from exposure to contamination. While concentrations of heavy metals above residential standards are present in the soils and groundwater in the immediate vicinity of the Former Plating Area, and low levels of VOC contamination are present in the groundwater throughout the Facility, EPA has determined that the soil and groundwater contamination is not impacting any potential receptors at levels that represent an unacceptable risk. Moreover, EPA is proposing ICs to (1) restrict the use of the Facility property to industrial purposes, (2) prevent future exposures to contaminated soil and/or groundwater at the Facility, and (3) to prohibit the use of Facility groundwater for potable purposes or any other use that could result in human exposure.

#### **2. Achieve Media Cleanup Objectives for Soil and Groundwater**

EPA’s proposed remedy meets the non-residential cleanup objectives based on current and reasonably anticipated land and water resource use. The majority of Facility soils contain contaminant concentrations below EPA’s RSLs and PADEP’s SHSs for residential soils. For those areas where contaminants remain in place above EPA’s RSLs and PADEP’s SHSs for residential soils, ECs and ICs will be maintained and implemented to address potential direct contact risks.

Although heavy metals and VOCs are present in the groundwater beneath the Facility at concentrations above MCLs, drinking water at the entire Facility and surrounding areas is serviced by the York Water Company. In addition, Springettsbury Township ordinance (Article I Connection to System in Mt. Zion Water District) requires that any new building that is located within 150 feet of any public street or easement containing a public water main within the Mt.

Zion Water District must obtain a connection to the York Water Company and disconnect any on-lot wells except for specific non-potable uses. Furthermore, the groundwater contaminant plume does not migrate beyond the Facility property at levels above MCLs, EPA's drinking water standards. Even though the groundwater in the vicinity of the Facility is not used, and will not be used in the foreseeable future as a drinking water source, EPA is proposing to require an enforceable agreement, order, or Environmental Covenant to prohibit consumptive use of the groundwater.

### **3. Remediating the Source of Releases**

In all remedy decisions, EPA seeks to eliminate or reduce further releases of hazardous wastes or hazardous constituents that may pose a threat to human health and the environment.

As shown in the Act 2 Final Report, the Facility met this objective for the heavy metals contamination by decommissioning and removing the nickel and chromium plating tanks in 1989. With respect to the paint thinner constituents in soil, the Facility removed the four (4) USTs and excavated and disposed of visibly contaminated soils in 1991 and operated a soil vapor extraction system. There are no remaining discrete sources of waste from which constituents would be released to the environment.

## **B. Balancing/Evaluation Criteria**

### **1. Long-Term Effectiveness**

The proposed ICs will protect human health and the environment in the long term by controlling exposure to the hazardous constituents remaining in soils and groundwater. EPA's proposed remedy requires the compliance with and maintenance of land use and groundwater use controls at the Facility. EPA anticipates that these controls will be implemented through an enforceable agreement, order, or Environmental Covenant.

### **2. Reduction of Toxicity, Mobility, or Volume of the Hazardous Constituents**

The reduction of toxicity, mobility and volume of hazardous constituents at the Facility has already been achieved by source removal.

### **3. Short-Term Effectiveness**

EPA's proposed final remedy does not involve any activities, such as construction or excavation that would pose short-term risks to workers, residents, and the environment. In addition, EPA anticipates that the land use and/or groundwater use restrictions will be fully implemented shortly after the issuance of the Final Decision and Response to Comments.

### **4. Implementability**

EPA's proposed remedy is implementable through an enforceable agreement, order, or Environmental Covenant.

## **5. Cost**

EPA's proposed remedy does not require any further engineering actions to remediate soil, groundwater, or indoor air contamination at this time, and the costs of implementing institutional controls at the Facility will be de minimus.

## **6. Community Acceptance**

EPA will evaluate Community acceptance of the proposed remedy during the public comment period and will be described in the Final Decision and Response to Comments.

## **7. State/Support Agency Acceptance**

PADEP has already approved the approach proposed in this SB under Act 2.

## **VII. Environmental Indicators**

EPA sets national goals to measure progress toward meeting the nation's major environmental goals. For Corrective Action, EPA evaluates two key environmental indicators for each facility: (1) current human exposures under control and (2) migration of contaminated groundwater under control. The Facility met these indicators on October 13, 2010.

## **VIII. Financial Assurance**

EPA has evaluated whether financial assurance for corrective action is necessary to implement EPA's proposed remedy at the Facility. Given that EPA's proposed remedy does not require any further engineering actions to remediate soil, groundwater, or indoor air contamination at this time, and given that the costs of implementing institutional controls at the Facility will be de minimus, EPA is proposing that no financial assurance be required.

## **IX. Public Participation**

Before EPA makes a final decision on its proposal for the Facility, the public may participate in the remedy selection process by reviewing this SB and documents contained in the Administrative Record (AR) for the Facility. The AR contains all information considered by EPA in reaching this proposed decision. It is available for public review during normal business hours at:

U.S. EPA Region III  
1650 Arch Street  
Philadelphia, PA 19103  
Contact: Ms. Jeanna R. Henry (3LC30)  
Phone: (215) 814-2820  
Fax: (215) 814-3113  
Email: [henry.jeannar@epa.gov](mailto:henry.jeannar@epa.gov)

Interested parties are encouraged to review the AR and comment on EPA's proposed decision. The public comment period will last thirty (30) calendar days from the date that notice is published in a local newspaper. You may submit comments by mail, fax, or e-mail to Ms. Jeanna R. Henry. EPA will hold a public meeting to discuss this proposed decision upon request. Requests for a public meeting should be made to Ms. Henry.

EPA will respond to all relevant comments received during the comment period. If EPA determines that new information warrants a modification to the proposed decision, EPA will modify the proposed decision or select other alternatives based on such new information and/or public comments. EPA will announce its final decision and explain the rationale for any changes in a document entitled the Final Decision and Response to Comments ("FDRTC"). All persons who comment on this proposed decision will receive a copy of the FDRTC. Others may obtain a copy by contacting Ms. Henry at the address listed above.

Date: 9/28/11



Abraham Ferdas, Director  
Land and Chemicals Division  
US EPA, Region III

Figure 1: Location of the Facility  
Figure 2: Site Diagram

**Figure 1**







Location of the Facility

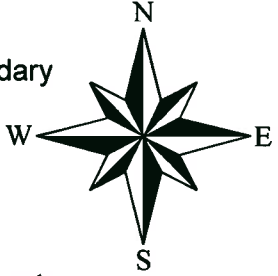
Former Cole Office Environments  
York, PA

# Figure 1: Cole Office Environments



## Legend

-  Cole Office Environments
-  Cole Office Environments Boundary
-  Harley Davidson Motor Co.
-  Harley Davidson Motor Co. Boundary
-  Roads
-  Water Bodies



Site Boundaries are approximate.  
 EPA Region 3, LCD GIS Team: J.Anstotz and J.Hennessy

**Figure 2**

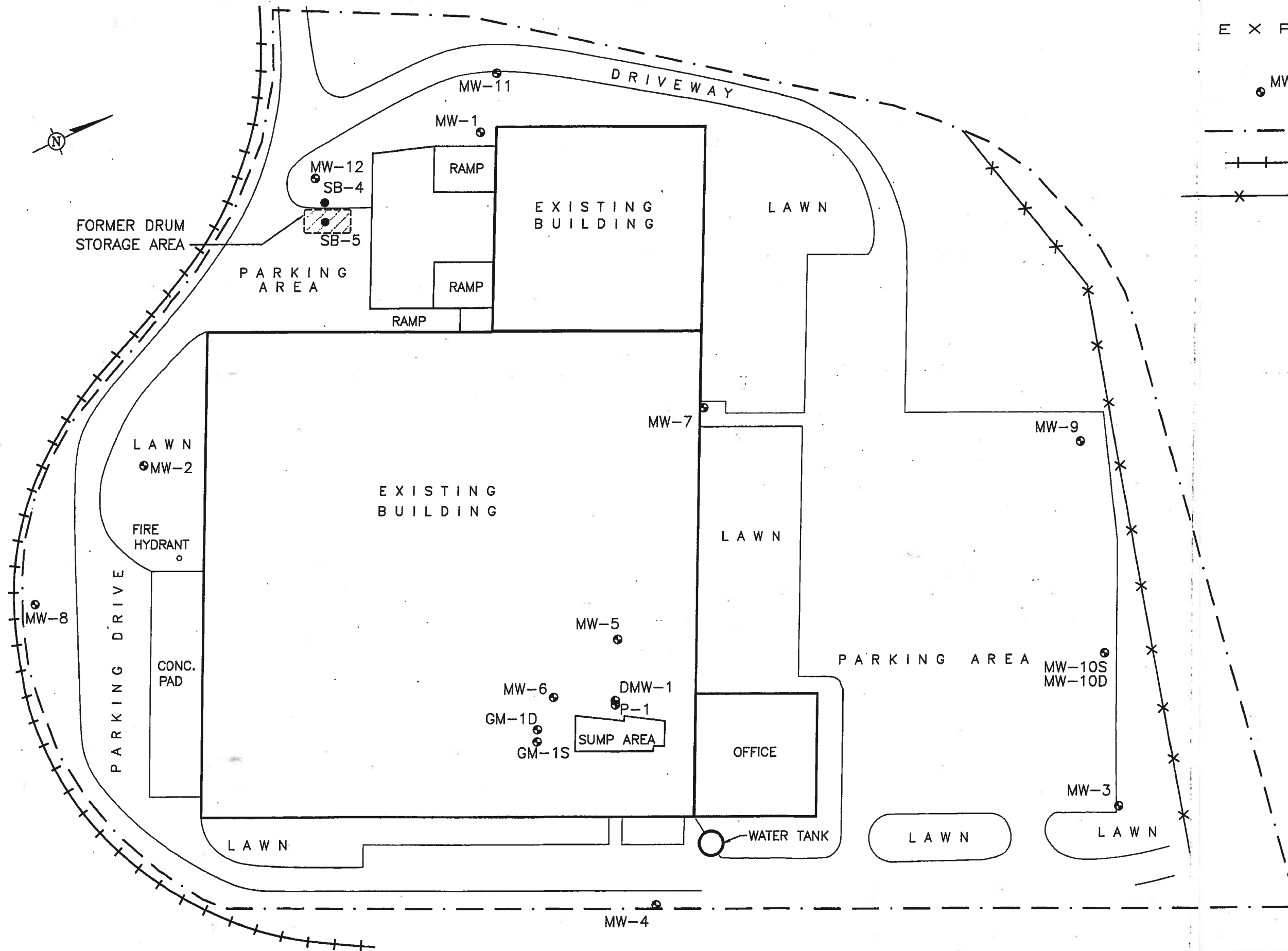
Site Diagram

Former Cole Office Environments  
York, Pennsylvania



EXPLANATION

- MW-3 LOCATION AND DESIGNATION OF MONITORING WELL
- - - - - LOCATION OF PROPERTY LINE
- + + + + + LOCATION OF RAILROAD TRACKS
- \* \* \* \* \* LOCATION OF FENCELINE



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0 100 FT  
APPROXIMATE SCALE

**ARCADIS GERAGHTY & MILLER**

3000 Cabot Blvd West  
Suite 3004, Langhorne, Pa 19047



**COLE OFFICE ENVIRONMENTS  
NORTH PLANT  
YORK, PENNSYLVANIA**

|                        |                 |                                 |                                |
|------------------------|-----------------|---------------------------------|--------------------------------|
| DRAWN<br>M. WASILEWSKI | DATE<br>1/12/00 | PROJECT MANAGER<br>P. MILONIS   | DEPARTMENT MANAGER<br>D. SOUSA |
| <b>SITE LAYOUT</b>     |                 | LEAD DESIGN PROF.               | CHECKED<br>D. BURNS            |
|                        |                 | PROJECT NUMBER<br>NP000223.0005 | DRAWING NUMBER<br>2            |