



Long-Term Stewardship Inspection Report

Superior Tube Co./Ametek

EPA ID#: PAD002353407

Collegeville, PA

Introduction

Long-term stewardship (LTS) refers to the activities necessary to ensure that engineering controls (ECs) are maintained and that institutional controls (ICs) continue to be enforced. The purpose of the EPA Region 3 LTS program is to periodically assess the efficacy of the implemented remedies (i.e., ECs and ICs) and to update the community on the status of the RCRA Corrective Action facilities. The assessment is conducted in twofold, which consists of a record review and a field inspection, to ensure that the remedies are implemented and maintained in accordance to the final decision.

Site Background

The Superior Tube Co./Ametek facility is approximately 71 acres and is located at 3900 Germantown Pike in Lower Providence Township, Montgomery County, Pennsylvania. Since 1935, Superior Tube Company (STC) has manufactured specialty cold-drawn precision tubing and formed tubular parts. Operations at the facility include drawing, welding, degreasing, pickling, annealing, cutting, forming, grinding, polishing coating, and sandblasting metal tubing. In 2015, Ametek Inc. (Ametek) acquired the STC facility and retains the environmental liabilities at the site. The Facility, henceforth, is referred to as the STC/Ametek facility.

The Facility is currently under the One Cleanup Program with the Pennsylvania Department of Environmental Protection (PADEP) and the United States Environmental Protection Agency (EPA). In 2011, STC/Ametek entered into the PADEP Act 2 Land Recycling Program (Act 2) in collaboration with the EPA Administrative Order on Consent to monitor and remediate groundwater contamination at the site. The contaminants of concerns (COCs) are volatile organic compounds (VOCs) that include and not limited to tetrachloroethylene (PCE), trichloroethylene (TCE), and vinyl chloride (VC) in groundwater. Currently, STC/Ametek operates six recovery wells, also referred to as the Northern Recovery System, to sustain hydraulic control of the groundwater plume and to remediate groundwater contamination via two onsite air strippers. The treated groundwater is discharged through a National Pollutant Discharge Elimination System (NPDES) permit. Currently, groundwater plume migration is under control and most of the contaminant plume is contained within the Facility boundaries.

In addition to the groundwater remediation, Ametek/STC connected several surrounding residences with groundwater wells to public water. In 2011-12 and under the agreement with 2011 PADEP Consent Order, Ametek/STC contributed to a water line extension in the vicinity of the Facility that included areas where the Facility-related contaminants can potentially impact the groundwater.

Current Site Status

Under the PADEP Act 2 Program and in collaboration with the EPA, Ametek/STC will continue to monitor the groundwater plume and operate the pump and treat system to ensure that the current network of pumping wells continue to control and remediate the groundwater contamination. Per the requirement of the Act 2 Program, Ametek/STC submits periodically status reports to both Agencies on the progress of the groundwater remediation.

Long-term Stewardship Site Visit

On February 23, 2015, EPA conducted a long-term stewardship site visit with PADEP and STC/Ametek representatives to discuss and assess the status of the implemented remedies at the site.

The attendees were:

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Khai M. Dao	USEPA	dao.khai@epa.gov	(215) 814-5467
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Tom Deeney	Ametek	tom.deeney@ametek.com	(610) 889-5208
Mark Scheurer	Ametek	mark.scheuer@ametek.com	(610) 889-5263
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The remedies implemented at the site include engineering controls and institutional controls. The status and specifics for the respective controls, and a summary of a variety of topics discussed during the meeting and field inspection are presented in the subsequent sections.

Engineering Controls (ECs)

Engineering controls (ECs) encompass a variety of engineered and constructed physical barriers (e.g., soil cap, subsurface venting systems, fences, groundwater pump and treat) to contain and/or prevent exposure to contamination.

ECs implemented at the site include groundwater monitoring and remediation, and the maintenance of the asphalt cap above the former SWMU #17. Ametek/STC will continue to operate the pumping wells and monitor the groundwater to ensure that the implemented corrective action effectively remediates and controls the groundwater plume. Furthermore, the Facility continues to submit progress reports to PADEP and EPA that assess the effectiveness of the implemented remedies and to ensure to that the remedies continue to meet the requirements of protection of human health and the environment.

Institutional Controls (ICs)

Institutional controls (ICs) are administrative or legal instruments (e.g., deed restrictions/notices, easements, covenants, zoning) that impose restrictions on the use of contaminated property or resources. ICs are also used to identify the presence of ECs and LTS requirements.

ICs at the facility include land use and groundwater use restrictions. Land use at the site is limited to non-residential use. Any proposed changes in land use beyond the current designated non-residential use will require the approval of EPA and must meet the required cleanup standards for the specific land use. The groundwater beneath the facility is limited to non-portable purposes only.

In March 2012, Lower Providence Township adopted an ordinance that requires all potable water users in the vicinity of the Facility to connect to public water, prohibits private groundwater wells in the vicinity of the Facility, and requires all existing groundwater wells in the vicinity of the Facility to be disconnected and closed in full compliance with all state and local laws.

Financial Assurance:

Ametek/STC maintains a line of credit to ensure that there are sufficient funds to implement and maintain the groundwater monitoring and remediation at the site.

Land Redevelopment:

Ametek/STC sold a large portion of open area next to the manufacturing plant, also known as the former baseball field, to a developer. The developer plans to construct multiple townhouses and single family homes. As required under the environmental covenant for the redevelopment of the land, groundwater use is restricted. All new construction will be connected to public water and will include a vapor barrier and a passive mitigation system to eliminate any potential indoor vapor intrusion related to the groundwater contamination at the Facility.

Field Inspections:

After the meeting, EPA, PADEP and the Ametek/STC representatives toured the manufacturing operations at the facility and conducted a field inspection of some of the monitoring wells and the groundwater remediation system. The implemented remedies are operational and continue to be effective in remediating and containing the groundwater plume.

Community Contact

Subsequent to the LTS site visit, EPA contacted the Lower Providence Township to inform the Township the purpose of the LTS site visit and the status of the groundwater remediation. EPA also informed the Township that Khai M. Dao is the point of contact at EPA and provided Mr. Dao's contact information if the Township has any questions regarding the implemented remedies at the Facility.

Conclusion:

The implemented remedies remain effective in meeting the objectives of protection of human health and the environment. Ametek/STC will continue to implement the groundwater monitoring and remediation under the One Cleanup Program.