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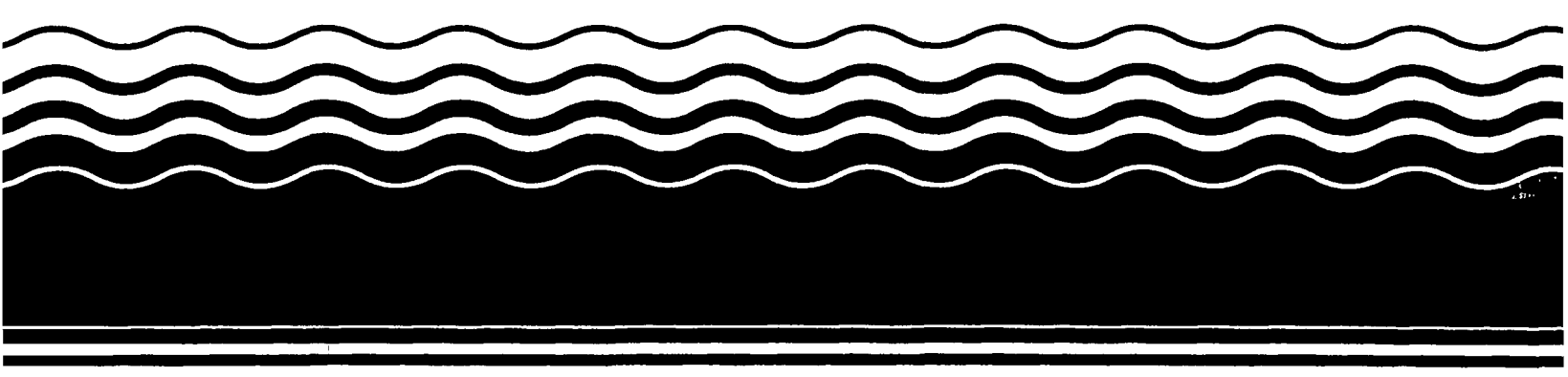
EPA 541-R98-039
September 1998

EPA Superfund
Explanation of Significant Difference for the Record of Decision:

Westinghouse Elevator Co. Plant
Gettysburg, PA
8/3/1998



EXPLANATION OF SIGNIFICANT DIFFERENCES
WESTINGHOUSE ELEVATOR SUPERFUND SITE

I. INTRODUCTION

SITE NAME: **Westinghouse Elevator Superfund Site**

SITE LOCATION: **Cumberland Township, Adams County, Pennsylvania**

LEAD AGENCY: **U.S. Environmental Protection Agency, Region III ("EPA" or the "Agency")**

SUPPORT AGENCY: **Pennsylvania Department of Environmental Protection ("PADEP")**

Statement of Purpose

This Explanation of Significant Differences ("ESD") is issued in accordance with Section 117(c) of the Comprehensive Environmental Response, Compensation and Liability Act, as amended ("CERCLA"), and is now a part of the Administrative Record for the Westinghouse Elevator Superfund Site ("Site"). This document explains significant differences to the remedy selected in the Record of Decision ("ROD") for the Site signed by the Regional Administrator on June 30, 1992 for Operable Unit 1, attached hereto as Exhibit 1.

II. SUMMARY OF THE SITE HISTORY, SITE CONDITIONS, AND SELECTED REMEDY

General Background

The Westinghouse Elevator Plant ("Plant"), owned by Westinghouse Electric Corporation ("Westinghouse" is now known as CBS Corporation. References to either Westinghouse or CBS Corporation will be made throughout this document as appropriate.), is located on approximately 90 acres along the west side of Biglerville Road (Route 34), about 1.5 miles north of downtown Gettysburg in Cumberland Township, Adams County, Pennsylvania (Figure 1 attached). The southern boundary of the Plant property is adjacent to property that is part of the Gettysburg Battlefield National Park. Residential areas are directly adjacent to the north and east of the Plant and many homes are within the boundary of the ground water contamination. Homes are also located about one thousand feet to the west of the Plant building.

Prior to its current use, most of the property consisted of farmland. A farm pond, approximately two acres in area, existed on the property near what is now the main entrance to the Westinghouse Plant. The Plant was constructed in 1968 to manufacture elevator and escalator components. Schindler Elevator Corporation ("Schindler") has leased and operated the Plant building since January 1989.

Chemical feed materials used in the manufacturing process at the Plant included solvents, paints, cutting oils, and lubricants. Trichloroethene ("TCE") was the primary solvent used until 1975, when 1,1,1-trichloroethane ("TCA") was substituted for TCE.

Spent solvents, oils, and greases are drummed and stored until they are taken off-Site for disposal. Prior to about 1981, drummed waste chemicals were stored in an area located in the southern portion of the plant referred to as the Old Waste Drum Storage Area. Since then, drummed wastes have been stored on a covered, diked, concrete pad near the shipping docks. Metal grates from the Plant's paint booths were formerly cleaned on a concrete pad in the Pumphouse Area. Also, in the past, solvent-coated metal chips and shavings were stored in metal bins near the Railroad Dock Area prior to removal off-Site.

Site Environmental History

Investigations of alleged environmental problems related to the Site were initiated in 1983, based on complaints from local residents to the Pennsylvania Department of Environmental Resources (now known as the Pennsylvania Department of Environmental Protection, "PADEP"). PADEP representatives visited the Plant in 1983 and collected samples from the Plant irrigation well and from neighboring residential wells. Chemical analysis of these samples confirmed the presence of Volatile Organic Compounds ("VOCs") including TCE and TCA in the on-Site and off-Site ground water. The residential well sampling indicated widespread contamination throughout the area bounded by Biglerville, Table Rock and Boyd's School Roads.

In October 1983, PADEP sampled two areas suspected of causing VOC contamination in the ground water on the Plant property. The soils from the pump house and the railroad loading dock were found to be contaminated with TCE and other VOCs. Westinghouse removed ten drums of contaminated soil from the railroad dock and thirty three drums of soil from the Pumphouse Area. Figure 2 shows these areas. The drums were manifested as a hazardous waste and were sent to a secure landfill in New York State for disposal.

In 1984, Westinghouse installed water mains along Biglerville Road and a portion of Boyd's School Road to provide residents with access to the public water supply. Since 1984, Westinghouse has installed additional mains along stretches of Boyd's School Road, Table Rock Road, Cedar Avenue, Maple Avenue, and Apple Avenue. Westinghouse also installed monitoring wells and sampled ground water from these monitoring wells during this time.

In June 1984, Westinghouse installed and began extracting ground water at the Site and operating an air stripping tower to remove TCE and other VOCs from ground water. The

stripper has shut down several times for various reasons and then restarted. The stripper discharges to the northern tributary, a stream along Boyd's School Road, and is regulated by a National Pollutant Discharge Elimination System ("NPDES") permit. The stripper currently discharges about twelve gallons of treated ground water per minute.

On March 10, 1987, Westinghouse entered into a Consent Agreement with EPA to perform a Remedial Investigation and Feasibility Study of the Site. The Remedial Investigation was completed in two phases: a) Phase I investigated the Site contaminants and hydrogeology b) Phase II investigated the extent of contamination. The Phase II Remedial Investigation Report was completed in June 1991 and a draft Feasibility Study was submitted to EPA in October 1991, which was substantially modified, by Westinghouse after EPA review. Additionally, finalization of the report was further delayed by the need to investigate soil contamination from a TCA spill which occurred on May 3, 1991, while Schindler was operating the Plant. Schindler removed contaminated soils, and sampled the area to verify the cleanup at the PADEP's request. To avoid further delay in the ground water cleanup, EPA allowed Westinghouse to submit a revised Feasibility Study that addressed sediments, surface water and ground water at the Site. A ROD was issued on June 30, 1992, which selected a remedy for contaminated ground water; ground water was designated as Operable Unit 1 for the Site. The components of the selected Remedial Action for ground water include:

- Extraction wells on the Plant property to contain the highly contaminated ground water plume.

- Extraction wells to contain and clean up the contaminated ground water which has migrated from the Plant property.

- Treatment of contaminated ground water by air stripping.

- Discharge of the treated ground water to the northern tributary of Rock Creek under an NPDES permit.

- Ground water monitoring and residential well sampling.

- Deed restriction on the Plant property.

EPA issued a Unilateral Order to Westinghouse and Schindler on December 29, 1992, which compelled Westinghouse and Schindler to design and implement the Remedial Design and Remedial Action for ground water. EPA received a letter dated January 29, 1993, from Westinghouse agreeing to comply with the Unilateral Order; Schindler, however, declined to comply with the Unilateral Order.

Additional investigation of the TCA spill in the Plant courtyard was conducted and completed by Westinghouse and Schindler; the investigation concerning soils was designated as Operable Unit 2. A revised Feasibility Study for soils, including the courtyard soils, was received by EPA in January 1994 and was approved by EPA in March 1994. EPA determined

that No Additional Action was required to remediate Site soils and issued a ROD which documented this decision on March 31, 1995.

Westinghouse (now known as CBS Corporation) is currently conducting the remedy for the ground water under EPA oversight. A pilot ground water extraction system began operation in October 1995. The pilot system gathered information for over one year. Westinghouse submitted a report to EPA on May 1997 which showed that the extraction system appeared to be capturing all of the contaminated ground water as required by the June 30, 1992 ROD.

III. DESCRIPTION OF SIGNIFICANT DIFFERENCES

Following the issuance of the previous ground water ROD, EPA has determined that minor changes should be made to the remedy set forth in the June 30, 1992 ROD. These changes are identified as Significant Differences and do not constitute ROD amendments, as that term is used in 40 C.F.R. § 300.435(c)(2)(ii). The Significant Difference between the remedy presented in the June 30, 1992 ROD and the changes to the ROD that will be implemented are explained below. Except to the extent changed by Sections 1) and 2) below, all of the terms of the ROD remain in effect.

Section 1 - Treatment Plant Location

The June 30, 1992 ROD required both an on-Plant ground water extraction system and an off-Plant ground water extraction system. The ROD required that ground water extracted outside of the Westinghouse property would be conveyed to the air stripping unit on the Plant property.

During the Remedial Design of the pump and treat system, Westinghouse asked if they could take an unusual approach regarding Site remediation. The geology (fractured bedrock) and the presence of Dense Non-Aqueous Phase Liquids made the design of the Site remediation difficult; consequently, it appeared to EPA and Westinghouse that the ground water extraction system might need to go through several iterations to develop a system which would capture all of the contaminated ground water. Therefore, EPA allowed the unusual approach suggested by Westinghouse which involved the development and installation of a full scale pilot remediation system during the design phase. This approach would avoid the possibility of having EPA requiring major design changes during the Remedial Action. Using the approach suggested by Westinghouse, the full scale system was developed and the modifications needed were identified during the design. The off-Plant extraction system was piped to an off-Plant treatment system on the Hurf-Jones property (located off Boyd's School Road). Westinghouse did not want to install a conveyance line to an on-Plant stripper until the size of the required pumps and piping was established.

When EPA developed the ROD for ground water, EPA believed it would be simpler and cheaper to pump the ground water extracted off-Plant to an air stripper located on the Plant property. No additional NPDES permit would be required and a common treatment unit was expected to be less expensive. EPA was also concerned that obtaining off-Plant access for a

treatment plant might have been difficult, causing project delays.

However, during the Remedial Design, Westinghouse resolved all of the issues related to a separate off-Plant treatment unit that might have impeded progress of the cleanup. Westinghouse obtained long-term access for an off-Plant carbon adsorption system and constructed/operated the treatment plant for the pilot extraction system. The treatment system building is located on the Hurf-Jones property and CBS Corporation has an agreement for long term access for this building. CBS Corporation also has obtained an NPDES permit from the PADEP for long-term discharge from this treatment system. The carbon treatment system which has been constructed, is of high quality and is fully adequate for long term operation.

CBS Corporation has asked EPA to allow the continued use of the off-Plant treatment system rather than constructing a pipeline to the Plant air stripper as stated in the June 30, 1992 ROD. Since the existing system is fully satisfactory, and since all of EPA's concerns have been addressed, EPA sees no reason to reject this request.

The use of the existing treatment plant has several benefits compared to the work required under the ROD: 1) The continued use of the off-Plant system is cost effective and will avoid abandoning a fully functional operating system. 2) The use of the existing system will avoid construction which would disrupt Boyds School Road and Route 34. Route 34 is a major north/south road carrying substantial traffic into Gettysburg. 3) This modification is relatively minor, and will not change either the performance standards of the remedy or the protectiveness of the Remedy. 4) There will be no air emissions at all from the off-Plant system.

Section 2 - Carbon Adsorption of VOCs in Stripper Emissions

The June 30, 1992 ROD also required that air emissions must meet PADEP's requirements of Best Available Treatment. Because emissions were so low, Westinghouse petitioned the PADEP for a variance and was not required to treat the air emissions.

The total VOC emissions from the Air Stripper are 0.009 kg/hour. The uncontrolled stripper emissions would also comply with the following Applicable or Relevant and Appropriate Requirements ("ARARs") listed in the June 30, 1992 ROD: A) RCRA requirements of Subpart AA (Air Emissions for Process Vents) of the federal RCRA regulations, 40 C.F.R. 264.1032, which are relevant and appropriate ARARs. Under this ARAR, total organic emissions from the carbon adsorption unit must be less than 1.4 kg/hour and less than 2800 kg/year. B) The stripper would also comply with OSWER Directive 9355.0-28 which requires control of hydrocarbon emissions in excess of 15 lbs per day in ozone non-attainment areas. This guidance is not an ARAR, but a To Be Considered document in accordance with 40 C.F.R. § 300.400(g)(3).

IV. PUBLIC PARTICIPATION

This ESD and the information upon which it is based have been included in the Administrative Record file for this Site. The Administrative Record also includes the ROD and

all documents that formed the basis for EPA's selection of the Remedial Action for the Site. The Administrative Record is available for public review at the locations listed below:

U.S. EPA, Region III
841 Chestnut Building
Philadelphia, PA 19107

and

Adams County Public Library
59 East High Street
Gettysburg, PA 17325

Questions and comments on EPA's action and requests to review the Administrative Record can be directed to:

Frank Vavra
Remedial Project Manager
Mail Code: 3HS22
U.S. EPA, Region III
1650 Arch Street
Philadelphia, PA 19103-2029
(215) 814-3221

VI. SUPPORT AGENCY REVIEW

The Pennsylvania Department of Environmental Protection has concurred with the proposed changes to the remedial action in the proposed Explanation of Significant Differences in a letter dated June 26, 1998.

VII. AFFIRMATION OF STATUTORY DETERMINATION

Considering the new information that has been developed and the changes that have been made to the scope of the selected remedy, the EPA and PADEP believe that the revised remedy remains protective of human health and the environment, complies with the Federal and State requirement that are applicable or relevant and appropriate to this remedial action, and is cost effective. In addition, the revised remedy utilizes treatment technologies that permanently and significantly reduce the toxicity, mobility, or volume of the hazardous substances to the maximum extent practicable for this Site.

Abraham Ferdas, Director
Hazardous Sites Cleanup Division
Region III

8/3/98
Date

Figure 1

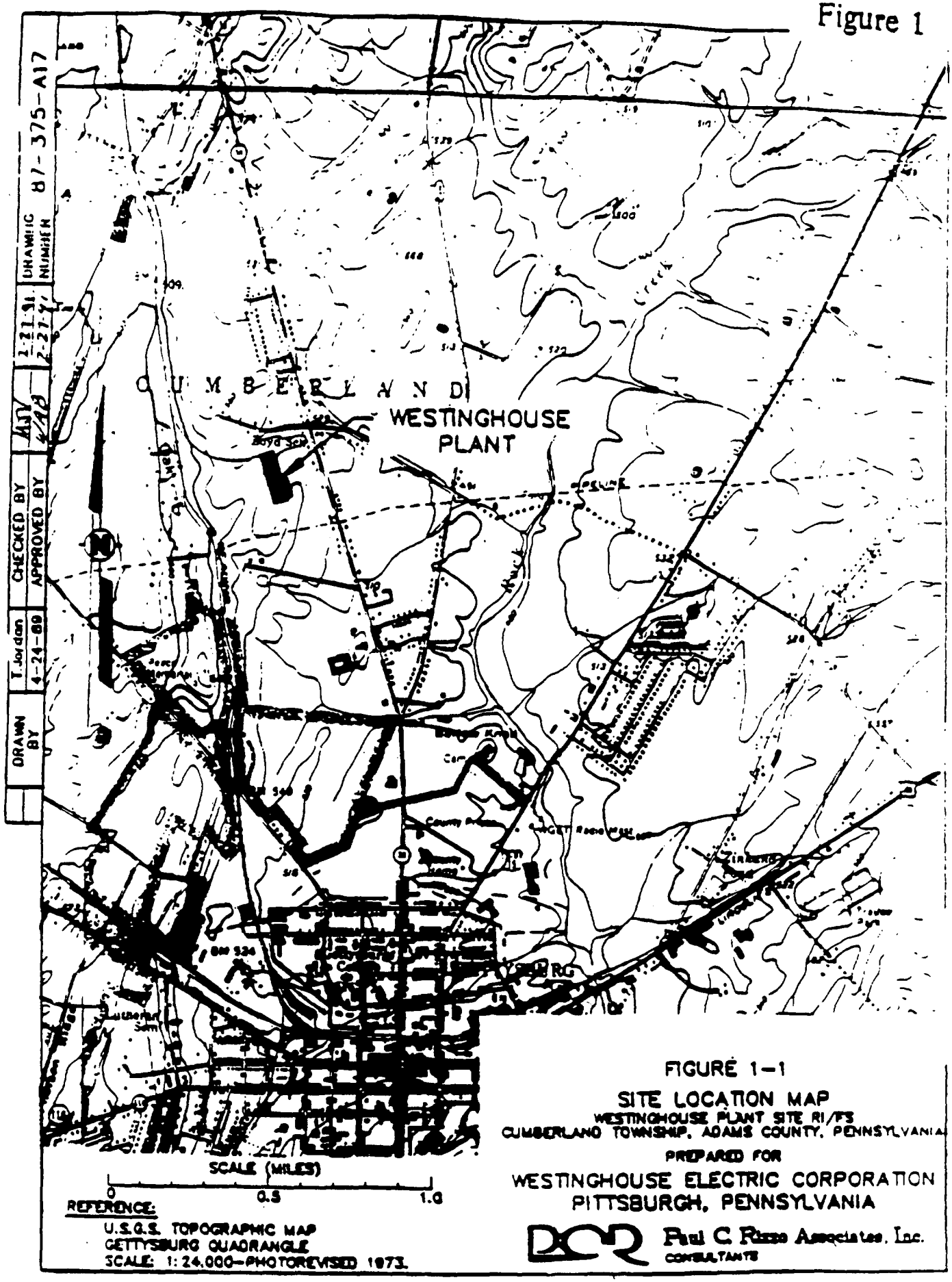


FIGURE 1-1

SITE LOCATION MAP

WESTINGHOUSE PLANT SITE RI/FS
CUMBERLAND TOWNSHIP, ADAMS COUNTY, PENNSYLVANIA

PREPARED FOR

WESTINGHOUSE ELECTRIC CORPORATION
PITTSBURGH, PENNSYLVANIA

Paul C. Rizzo Associates, Inc.
CONSULTANTS

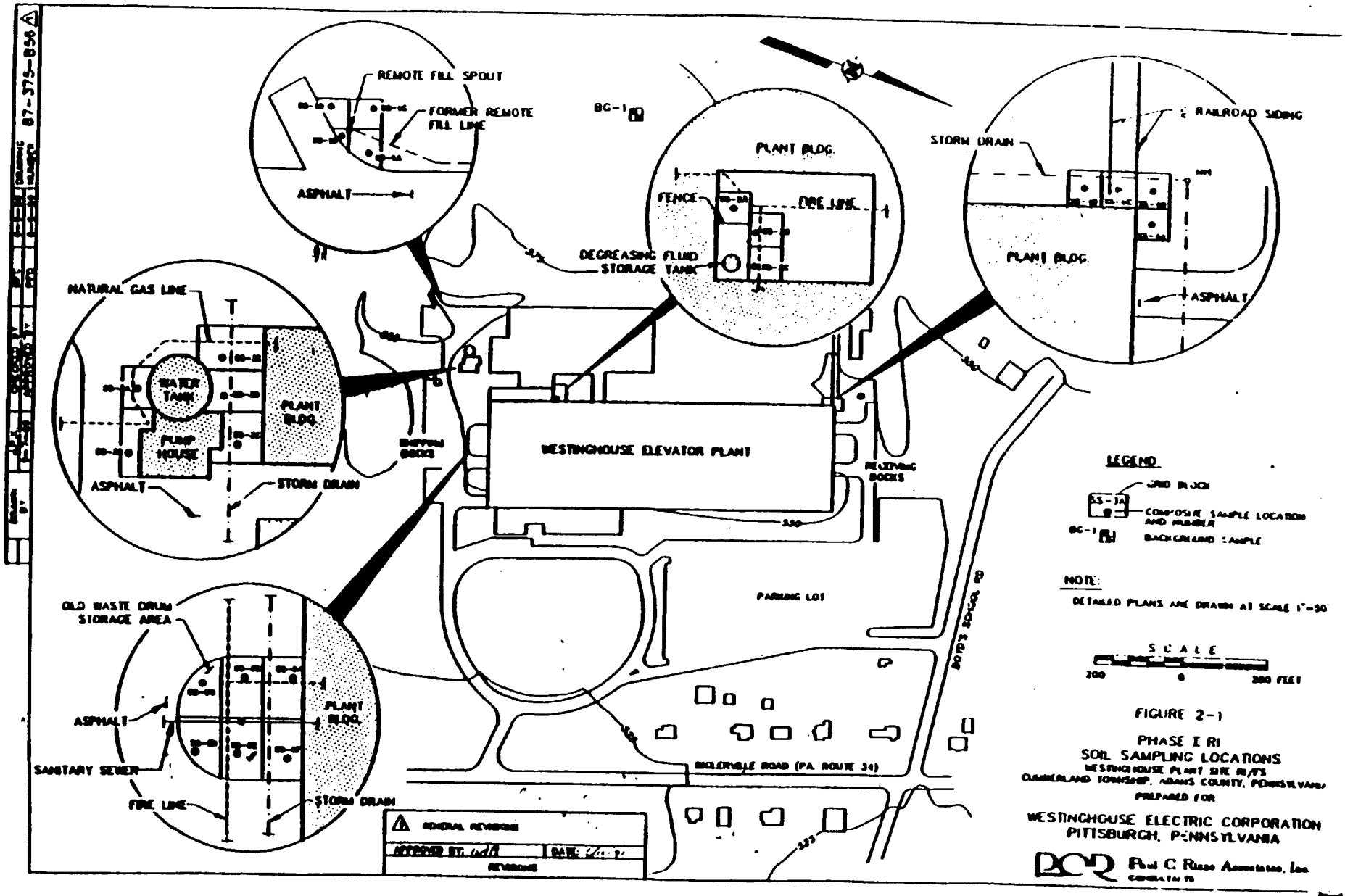

REMOTE FILL SPOUT
FORMER REMOTE FILL LINE
ASPHALT
BG-1
PLANT BLDG.
FENCE
FIRE LINE
DEGREASING FLUID STORAGE TANK
RAILROAD SIDING
STORM DRAIN
PLANT BLDG.
ASPHALT
NATURAL GAS LINE
WATER TANK
PUMP HOUSE
PLANT BLDG.
ASPHALT
STORM DRAIN
SHIPPING DOCKS
WESTINGHOUSE ELEVATOR PLANT
RECEIVING DOCKS
PARKING LOT
OLD WASTE DRUM STORAGE AREA
ASPHALT
PLANT BLDG.
SANITARY SEWER
FIRE LINE
STORM DRAIN
BIGLERVILLE ROAD (PA ROUTE 34)
LEGEND
SS-1A
COMPOSITE SAMPLE LOCATION AND NUMBER
BG-1
BACKGROUND SAMPLE
NOTE:
DETAILED PLANS ARE DRAWN AT SCALE 1"=50'
SCALE
200
0
200 FEET
FIGURE 2-1
PHASE I RI
SOIL SAMPLING LOCATIONS
WESTINGHOUSE PLANT SITE RI/FS
CUMBERLAND TOWNSHIP, ADAMS COUNTY, PENNSYLVANIA
PREPARED FOR
WESTINGHOUSE ELECTRIC CORPORATION
PITTSBURGH, PENNSYLVANIA
Paul C. Rizzo Associates, Inc.

Figure 2