

FCI USA Inc. (Formerly: DuPont Connector Systems; Berg Electronics)

**320 Busser Rd.
Emigsville, PA 17318
Congressional District 19
EPA ID #: PAD000796334
Site Property Area: 19 Acres
Last Update: 05/07/2010**

Status

The FCI USA Inc. facility received a Final Decision for No Further Action (NFA) from the U.S. Environmental Protection Agency on May 14, 1992. The decision to issue an NFA at the Facility was due to the results submitted in a Verification Investigation (VI) final report received on November 25, 1991. The analytical results for soil samples taken during the VI showed that the levels of contamination present at the site were far below EPA criteria for remedial action. Therefore, there was no threat to human health or the environment.

However, during the record review portion of the Environmental Indicator Inspection Report, it was identified that the facility, due to property transfer, entered into the PA Act 2 program. On November 16, 2005, FCI submitted a Notice of Intent to Remediate (NIR), in accordance with Act 2 requirements. Between 2000 and 2005, several phases of site investigation were performed initially under the FCI corporate due diligence process and later under the Act 2. Site investigations over this period included the following: installation of 128 Geoprobe™ soil borings, installation and sampling of 27 bedrock groundwater monitoring wells, screening of 157 soil gas points, and sampling of surface water from 17 locations, and sampling of other miscellaneous locations, including water supply wells, spring and seeps.

Conclusions drawn from the final Remedial Investigation Report (RIR) approved by PADEP on May 12, 2006 were as follows:

- Former Plating Pit Area- This area consisted of a 20,000 square foot lined pit used to collect plating wastewater and spills. Nickel impacted soils at concentrations above the "soil to groundwater" Medium Specific Concentrations (MSCs) were delineated along the deeper, southern end of the pit. Soil was excavated to the depth of bedrock in areas where feasible without compromising the integrity of the foundation of an adjacent building. The pit was backfilled and a new concrete floor was placed on the area. Groundwater concentrations of dissolved nickel were noted to have reduced over time and met residential groundwater MSCs at the property boundary.

- Former Waste Oil Underground Storage Tank Area- This area was located near the northeastern corner of the building. No soil source area was identified in the location of the former waste oil and was apparently removed with the UST prior to the construction of a building addition over this former UST location. However, groundwater contamination by 1,1,1-Trichloroethane (1,1,1-TCA), and its daughter products, was present at levels above non-residential MSC.
- The Former Loading Dock Sump Area- This area was located in close proximity to the Former Waste Oil UST area described above. The sump was used as containment for drummed solvent wastes as they were pumped out into an on-site still for reprocessing. Releases from the former UST resulted in a small area (less than 500 square feet) of soil impacted by 1,1-Dichloroethylene (a 1,1,1-TCA breakdown product) at levels above the non-residential soil to groundwater MSCs. Groundwater contamination from this source is commingled with the Former Waste Oil UST area groundwater contamination.
- Site-wide Groundwater- The Site-wide Groundwater contamination was evaluated based on on-site sources (1,1,1-TCA, its breakdown products, and nickel) and an off-site Trichloroethylene (TCE) plume. The following conclusions were made:
 - Off-site TCE Plume- A TCE groundwater plume (along with its breakdown products) enters and leaves the southern end of the site at concentrations exceeding non-residential MSCs in both the shallow and deep bedrock flow regimes. A non-aqueous phase liquid containing TCE and other constituents was encountered in the deep flow regime upgradient of the property boundary. According to the update issued by FCI on May 27, 2008, PADEP has concurred that the TCE is from an off site source and that further investigation of this issue is not the responsibility of FCI.
 - Fate and transport analysis demonstrates that the 1,1,1-TCA plume has not, and will not impact off-site residential groundwater receptors. Furthermore, the results showed that impacts to surface water in Codorus Creek and Emig Run is not of concern.
- There were no exceedances of soil or groundwater screening values under the Act 2 Vapor Intrusion Guidance for protection of indoor air quality for on-site source-related contaminants as well as the background TCE.

A Risk Assessment and Cleanup Plan (RACP) was submitted to PADEP on August 16, 2006 and was approved by PADEP by letter dated November 13, 2006. The RACP proposed that the Act 2 standards that will be achieved based on the investigation and remediation work performed to date using a combination of background, site-specific and statewide health standards. To accomplish these goals eight quarters of demonstration groundwater monitoring were proposed as well as the filing of specific activity and use restrictions on the property deed.

According to the site update issued by FCI on May 27, 2008, a deed was filed for the sale of the

property from FCI to the current owners, Mundis Race Road L.P., on January 15, 2007. The deed references and includes, as "Attachment A", a November 29, 2006 "Buyer-Seller Agreement" which provides additional details and responsibilities for the environmental conditions, activity and use restrictions and site environmental conditions. The deed restrictions are necessary to maintain the conditions under which site-specific standards have been proposed for the site to comply under Act 2. The deed restrictions are as follows:

- Maintenance of any engineering controls, as necessary as covenants running with the land
- Groundwater at and under the property shall not be used for any drinking or agricultural purpose
- Require proper management of any disturbed impacted soils
- Manage the change of any on-site environmental exposure patterns
- Maintain capping components (building foundation or pavement) over the impacted soil areas including the Former Plating Pit Area and Loading Dock Sump Area

The Consent Order also includes a transferability clause for any subsequent owner of the property.

A site visit to FCI USA Inc. was performed on 1/20/09 where EPA learned that FCI submitted a Final Report under Act 2 on December 31, 2008. As a result of the information presented in the Final Report and the site visit, on March 3, 2009, PADEP's Hazardous Site Cleanup Act (HSCA) Program began sampling wells in the area to characterize the TCE plume that has been reported on the site as a background condition. The wells sampled during this investigation included the two wells on the Codorus Stone and Supply Emigsville Quarry (Quarry) property. This investigation discovered one of the constituents of concern (COC) from FCI's 1,1,1-TCA plume at concentrations above the residential, used aquifer Statewide Health Standard (SHS) for the Quarry's well #5. This COC, is 1,1-Dichloroethane. This well supplies groundwater to an occupied structure on the property, and represents a pathway and a receptor which must be addressed and protected under the Uniform Environmental Covenants Act (UECA).

The investigation also detected the presence of 1,1,1-TCA in a private well to the southeast of the site and Codorus Creek. While it was detected at levels below the SHS, the Fate and Transport modeling included with the Final Report did not adequately account for transport under the Codorus Creek.

In light of these discoveries, PADEP requested the following be addressed in the Act 2 Final Report:

- The Fate and Transport analysis needs to account for this offsite migration of COC's related to the 1,1,1-TCA plume.
- Offsite receptors will need to be protected under an Environmental Covenant, a Post Remedial Care Plan, or a combination of both.

EPA and PADEP are currently awaiting resubmission of the Final Report, response to the listed concerns, and an Environmental Covenant proposal.

Facility Description

The facility was initially developed by DuPont Connector Systems in 1975 for the manufacture of electrical connectors. DuPont operated the facility through 1993, and subsequently through two acquisitions until 2004 when the facility was closed. Between 2004 and the sale of the facility in 2006, the plant was decommissioned, the building decontaminated, equipment was removed and the site was remediated. The facility is currently being leased by Mundis Race Road, LP, to multiple tenants.

The property is situated at an approximate elevation of 355 feet above mean sea level (MSL). Approximately 20 feet of relief occurs across the property with the developed northern portion of the site sloping to the south toward an east-west trending tributary towards Codorus Creek. The tributary (Emig Run), traverses the southern half of the property. The smaller, undeveloped portion of the property south of Emig Run slopes towards the north. The brick building is surrounded by paved driveway/parking areas and landscaping. The eastern and southern property perimeters, as well as the banks of Emig Run, consist of native woodland. The vacant portion of the property south of Emig Run consists of a grass field bounded by woodland.

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