BAGHURST DRIVE SUPERFUND SITE

PROPOSED REMEDIAL ACTION PLAN

Harleysville, PA | EPA Region 3



EPA Announces Proposed Cleanup Plan

The United States Environmental Protection Agency (EPA) is issuing a proposed cleanup plan known as Proposed Remedial Action Plan (Proposed Plan) to address contamination at the Baghurst Drive Superfund Site.

The Site is located in the northwestern portion of Upper Salford Township, Montgomery County, PA. The Site includes a 52-acre farm property located at 1926 Hendricks Road (farm property). Additionally, a groundwater plume associated with the Site extends to the south of the farm property.

EPA is seeking comment on the Proposed Plan during a 30-day public comment period held from **May 11 - June 11, 2021**.

The public comment period is an opportunity for you to provide input on EPA's work. After the close of the public comment period, EPA will consider all comments and, as appropriate, move forward with a final cleanup plan and issue a Record of Decision (ROD). The public's comments and EPA's responses will be included in the Responsiveness Summary section of the ROD. Comments can be submitted via mail, e-mail, or voicemail. More details on how to submit comments are provided in the What's My Role in the Process section.

Site Background

The farm property was formerly used for agricultural purposes and consists of nearly 52 acres adjacent to Perkiomen Creek. The Baghurst Drive community to the south of the Site consists of approximately 27 residences.

A groundwater plume contaminated with volatile organic compounds (VOCs) affects a small community of single family homes, a number of which currently draw their water from a community well.

In 1999, the Montgomery County Health Department (MCHD) discovered groundwater contamination while conducting routine sampling of residential wells. The Pennsylvania Department of Environmental Protection (PADEP) began supplying 27 residences with bottled drinking water, equipped the homes with carbon filtration systems, and conducted an investigation.

PADEP referred the Site to the EPA and in 2014, EPA listed the Site on the National Priorities List (NPL), making it eligible for long-term investigation and cleanup.

EPA conducted a Remedial Investigation (RI) and evaluated alternatives to address contamination in a Feasibility Study. As part of this process, EPA sampled soil, groundwater, surface water and sediment.

EPA is currently designing an extension of the public waterline to affected residences. This process is ongoing, with construction scheduled to begin Fall 2021.

PUBLIC MEETING

A recorded video presentation is available on EPA's website. Due to public safety concerns and COVID-related restrictions, this video has been published in place of a live public meeting.

The public is encouraged to review the proposed plan, watch the presentation, and submit comments during the 30-day public comment period held from:

May 11 - June 11, 2021

To review the Proposed Plan, review the Administrative Record and watch the recorded presentation, please visit:

www.epa.gov/superfund/baghurst



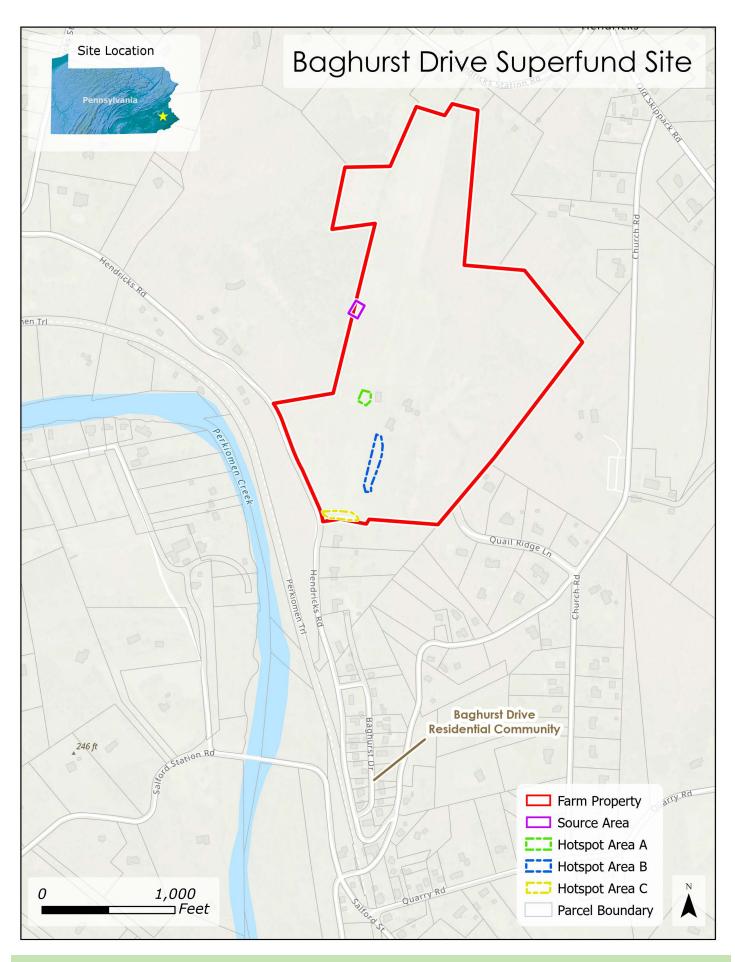
The Proposed Plan, Administrative Record and other site documents can also be viewed in person at:

Indian Valley Public Library 100 E. Church Ave. Telford, PA 18969 (215) 723-9109

or

U.S. EPA Region 3 1650 Arch Street Philadelphia, PA 19103 Phone: 215-814-3157

*The Indian Valley Public Library and EPA Region 3 office may be closed due to COVID-19 restrictions. Please call for operational status.



What is the proposed plan for future cleanup?

This Proposed Plan presents EPA's new alternative for:

Alternative 6: In Situ Thermal Remediation of Source Area and In Situ Chemical Oxidation in Hot Spot Areas. This Preferred Alternative includes:

- In Situ Thermal Remediation (ISTR) to treat source area groundwater
- In Situ Chemical Oxidation (ISCO) to treat groundwater hot spot areas
- Monitoring groundwater and vapor intrusion
- Institutional Controls (ICs)

EPA believes that the Preferred Alternative will be the most effective Alternative in addressing contaminated groundwater at the Site because it will permanently treat the areas of contamination.

EPA is seeking public comment on this preferred alternative site.

To review the proposed plan and the Administrative Record and to watch the recorded presentation visit:

www.epa.gov/superfund/baghurst



The Proposed Alternative Explained:

In Situ Thermal Remediation: In Situ Thermal Remediation (ISTR) is the process of heating up the subsurface (soil, groundwater) with electrical currents or direct heat using electrodes or heater wells. This heating evaporates VOCs where they're found. The vapors and steam are then extracted, cooled, and treated. The technology has been demonstrated as an effective method for the removal of VOCs in groundwater. At this site EPA is proposing to heat the soil, underlying bedrock, and groundwater. The vapor extraction wells would then extract and treat the steam and vapors.

In Situ Chemical Oxidation: In Situ Chemical Oxidation (ISCO) introduces chemicals called "oxidants" to contaminants, which then react with one another to create harmless byproducts. The treatment process is described as "in situ" because it is conducted where the contamination is located, without having to excavate soil or pump groundwater to the surface. EPA is proposing to inject oxidants into the contaminated soil and groundwater, where it would spread throughout the surrounding soil and groundwater, treating contaminants as it encounters them.

Monitoring Groundwater and Vapor Intrusion: Vapor intrusion (VI) occurs when vapor-forming chemicals in groundwater evaporate and make their way into buildings. Certain organic chemicals evaporate under normal indoor temperatures and pressure. The vapors can then move through cracks in buildings and foundations and into the air inside a building, which could affect indoor air quality and human health. EPA performed a VI evaluation and determined there was no unacceptable risk associated with vapor intrusion under current conditions. Groundwater monitoring would be conducted to assess the effectiveness of the remedy. Groundwater samples would be collected and analyzed for the primary site-related chemicals, and to ensure that vapors from the contaminated groundwater does not pose a health risk. While EPA does not expect VI to become an issue at the Site, the need for additional VI sampling and/or monitoring will be evaluated if there is new construction above or within 100 feet of the contaminated groundwater plume, or if there is an increase in contaminant concentrations near existing structures.

Institutional Controls: Institutional Controls (ICs) are legal and administrative tools used to maintain protection of human health and the environment by reducing potential for exposure to contamination and/or protecting the integrity of a response action. Institutional controls typically limit land use or provide guidance for human behavior. EPA is proposing to establish ICs to prohibit interference with the proposed cleanup plan, prevent installation of new potable water wells, and require EPA approval prior to construction of new residential dwellings in the area of groundwater contamination until protectiveness has been achieved.

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What is my role in the process?

The public is encouraged to review the Proposed Plan and submit comments to EPA. Comments may be submitted by postal mail, e-mail, or voicemail.

Mail comments postmarked no later than June 11th to:

U.S. EPA Region 3 Attn: Andrew Haneiko, RPM 1650 Arch Street (Mailcode 3SD21) Philadelphia, PA 19103

E-mail: haneiko.andrew@epa.gov

Voicemail: Call 215-814-2008 to leave a comment. Please speak slowly and clearly and include your name and phone number.

EPA's Nine Criteria Analysis

EPA evaluates each potential cleanup alternative using the following nine criteria:

- 1. Overall Protectiveness of Human Health and the Environment
- 2. Compliance with Applicable or Relevant and Appropriate Requirements
- 3. Long-term Effectiveness
- 4. Reduction of Toxicity, Mobility, or Volume through Treatment
- 5. Short-Term Effectiveness
- 6. Implementability
- 7. Cost
- 8. State Acceptance
- 9. Community Acceptance

Only after considering input from state officials and the community regarding the preferred alternative, will EPA make a final decision.

Additional Resources

For more information about the site, scan the QR Code with your smartphone or visit the website: www.epa.gov/superfund/baghurst

For more information about EPA's Superfund Program, please visit: http://www.epa.gov/superfund





U.S. Environmental Protection Agency, Region 3

Attn: Patrick McGettigan

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