



UNITED STATES

ENVIRONMENTAL PROTECTION AGENCY

REGION III

STATEMENT OF BASIS

UNIVAR USA

NORTH FAYETTE TOWNSHIP (CORAOPOLIS), PENNSYLVANIA

EPA ID NO. PAD061779815

I. Introduction

The United States Environmental Protection Agency (EPA) has prepared this Statement of Basis (SB) to solicit public comment on its proposed remedy for the Univar USA Coraopolis (Univar) facility located at 6000 Casteel Drive, Coraopolis, Pennsylvania, in North Fayette Township, Allegheny County, Pennsylvania (Facility or Site). EPA's proposed remedy consists of the operation and maintenance of the existing groundwater monitoring and recovery wells, a soil vapor extraction system and on-site vapor and groundwater treatment unit. Furthermore, EPA is proposing compliance with and maintenance of institutional controls (ICs) that restrict certain land and groundwater uses at the Facility. EPA proposes to implement the final remedy for the Facility through an enforceable document such as an order, agreement and/or environmental covenant to be entered pursuant to the Pennsylvania Uniform Environmental Covenants Act, 27 Pa. C.S. Sections 6501-6517, (UECA) and recorded with the deed for the Facility property.

The Facility is subject to the 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. Sections 6901 to 6992k. The Corrective Action program is designed to ensure that certain facilities subject to RCRA have been investigated and that all releases of hazardous waste and hazardous constituents have been remediated. The Commonwealth of Pennsylvania (the 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. Information on the Corrective Action program as well as a fact sheet for the Facility can be found by navigating through the EPA website <http://www.epa.gov/reg3wcmd/correctiveaction.htm>.

II. Facility Background

The Facility is approximately 3 acres in size and is located at 6000 Casteel Drive, Coraopolis, Pennsylvania. A layout of the Facility is presented in Figure 1. In 1964, McKesson Chemical Company (McKesson) began operating a solvent distribution service center at the Facility. McKesson stored chemical products in 10 above-ground storage tanks (ASTs). In 1988, McKesson obtained a hazardous waste storage permit from the Pennsylvania Department of Environmental Resources (PADER), which subsequently changed its name to the Pennsylvania Department of Environmental Protection (PADEP). The permit allowed McKesson to store spent solvents from off-site sources in a designated storage area separate from the 10 ASTs. In 1989, Van Waters and Rogers Inc. (VWR) purchased the Facility. During its ownership of the Facility, VWR decommissioned some of the ASTs. Neither McKesson nor VWR reportedly ever operated a hazardous waste storage area.

In 1998, PADEP terminated the Facility's hazardous waste storage permit and certified closure of the storage area. In 2002, Univar purchased the Facility and closed the solvent

distribution service operation. The 10 ASTs were decommissioned and removed as part of Facility closure activities. Currently, the only significant structure at the Facility is a warehouse that is leased to a moving company, Fdl Logistics. Univar is the current owner of the Facility.

III. Summary of Environmental History

VWR notified PADEP that contaminated soils were discovered during the decommissioning of the on-site ASTs. Subsequently, VWR prepared a series of site characterization reports that described the environmental conditions at the Facility and documented the scope of soil and groundwater contamination. The contamination consisted of chlorinated and non-chlorinated volatile organic solvents (VOCs). VWR excavated approximately 1500 cubic yards of the contaminated soil for off-site disposal under the oversight of PADEP.

In 1996, with PADEP’s approval, VWR installed groundwater monitoring and recovery wells, a soil vapor extraction (SVE) system and an on-site vapor and groundwater treatment unit, consisting of air “sparging” to oxidize the organics to hasten their degradation.

In 2004 the new owner, Univar, installed additional groundwater extraction wells and expanded the SVE system to expedite the cleanup.

Since the start-up of the remediation system, approximately 4,000 pounds of VOCs have been removed from the groundwater. This reduction has reduced total VOC levels in groundwater from 700 milligrams per liter (mg/l) to less than 100 mg/l. The current groundwater extraction system has maintained hydraulic control and has prevented offsite migration of the groundwater contamination. For soil, the SVE system has removed over 400 pounds of VOCs since the enhanced system came on-line in 2004. Despite the progress, concentrations of some VOCs in groundwater remain above their respective EPA 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.

The following table lists the constituents of concern in groundwater detected at the Facility and their respective MCLs in micrograms per liter (ug/l).

Constituents of Concern	Concentration (ug/L)	MCLs (ug/L)
Benzene	17	5
cis-1,2,-Dichloroethylene	38,000	70
1,1-Dichloroethylene	1,900	7
Tetrachloroethylene	210	5
1,1,1-Trichloroethane	59,000	200
1,1,2-Trichloroethane	18	5
Trichloroethylene	1100	5
Vinyl Chloride	280	2

Historically, 1,4-Dioxane was used as a primary stabilizer for 1,1,1-Trichloroethane (1,1,1,-TCA). Given the elevated levels of 1,1,1,-TCA detected in some of the monitoring wells, EPA is concerned that 1,4-Dioxane may be present in groundwater. Therefore, 1,4-Dioxane will

be added to the list of constituents to be sampled as part of the semi-annual groundwater monitoring program. Concentrations of 1,4-Dioxane will be recorded and evaluated with respect to EPA's Tapwater Risk Based Screening Concentration of 6.1 µg/l. However, the referenced concentration may change if and when an MCL is established for 1,4-Dioxane.

Univar continues to operate the groundwater extraction and SVE systems to address VOC contamination in soil and groundwater. Off-gas from the treatment process is discharged under the Allegheny County Health Department Air Quality Permit. Treated groundwater is discharged to the Moon Township Municipal Authority (Authority) sewer system under approval from the Authority. Univar conducts semi-annual groundwater monitoring and submits groundwater, soil vapor, air and water discharge data reports to PADEP on a semi-annual basis.

IV. Corrective Action Objectives

EPA's overall Corrective Action Objectives for the Facility are the following:

A. Subsurface Soils

As part of the initial cleanup contaminated surface soil was excavated and disposed off-site. Only subsurface soils pose a concern at the Facility. EPA's corrective action objective for subsurface soils at the Facility is the attainment of Pennsylvania's Non-Residential Statewide Health Standards (SHSs). EPA has determined that attainment of Pennsylvania's Non-Residential SHSs for subsurface soils are protective of human health and the environment for individual contaminants at the Facility. The Non-Residential SHSs meet or are more conservative than EPA's acceptable risk range for non-residential (industrial) use.

B. Groundwater

EPA's proposed corrective action objectives for groundwater at Univar are:

1. to prevent off-site migration of contaminants while levels remain above MCLs and
2. to reduce contaminant levels throughout the groundwater to either the MCLs unless EPA, in its sole discretion, determines that it is technically impracticable to do so.

V. Proposed Decision

A. Subsurface Soils

EPA is proposing to require the operation and maintenance of the soil vapor extraction system until sampling demonstrates that the Pennsylvania Non-Residential SHSs for subsurface soils are attained.

Because contaminants will remain in Facility soils above levels appropriate for residential uses, this proposed remedy requires that institutional controls (ICs) be implemented to restrict the Facility to non-residential uses. ICs are non-engineered instruments such as administrative and/or legal controls that minimize the potential for human exposure to contamination and/or

protect the integrity of the remedy by limiting land or resource use. In addition, because areas at the Facility contain soils above PADEP's Non-Residential SHSs, EPA proposed remedy requires that those areas not be used for non-residential (industrial) purposes until PADEP's Non-Residential SHSs are attained in those areas or it is demonstrated through an EPA approved risk assessment that the contaminant levels are low enough that such use does not pose a threat to human health or the environment or interfere with the final remedy.

B. Groundwater

Under this proposed remedy, EPA is requiring the following actions:

1. the continuation of contaminant removal and hydraulic containment through operation and maintenance of the existing pump and treat system;
2. the continuation of the semi-annual groundwater monitoring program to monitor the progress of the remediation and to confirm that the groundwater contamination is contained within the Facility property boundary;
3. the maintenance of the existing fence around the Facility, including the fence around the remediation equipment, including but not limited to wells and treatment units, until the remediation is complete, and
4. the implementation of institutional controls to prohibit on-site groundwater use; limit Facility property to non-residential uses, and require all subsequent owners to comply with these restrictions.

EPA proposes to require the above listed actions until the constituents of concerns (COCs) in groundwater meet MCLs. EPA recognizes that there are physical and engineering limitations that may prevent cleanup to MCLs at the Facility. Therefore, EPA may determine at some future time that groundwater contamination reduction to MCLs is "technically impracticable." EPA may modify the remedy to require, hydraulic containment of the groundwater contamination through the continued operation of the existing groundwater pump and treat system within a defined area rather than clean up of the contaminated groundwater to MCLs. If EPA determines that such a modification and/or any additional corrective measures are warranted, EPA will solicit public comments prior to amending the Final Decision and Response to Comments (FDRTC) and including them in the final remedy for the Facility.

C. Implementation

EPA proposes that the final remedy for the Facility will be implemented through an enforceable document such as an enforceable order, agreement and/or an Environmental Covenant to be entered pursuant to the Pennsylvania Uniform Environmental Covenants Act, 27 Pa. C.S. Sections 6501-6517, (UECA) and recorded with the deed for the Facility property.

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.

A. Threshold Criteria

1. **Protect Human Health and the Environment** – EPA's proposed remedy protects human health and the environment from exposure to contamination. Prior to the excavation and disposal activities, the primary human health and environmental threats posed by contaminated soils at the Facility were related to direct contact with those soils. Those threats were greatly reduced through the excavation and disposal activities and continue to be reduced through the operation of the SVE system. In addition, since Univar removed the 10 ASTs, there are no remaining large, discrete sources of waste from which constituents would be released to the environment.

Moreover, the continued operation of the groundwater monitoring and recovery wells and the on-site vapor and groundwater treatment unit have greatly reduced the human health and environmental threats posed by contaminated groundwater at the Facility. The concentrations of VOCs in the groundwater have been greatly reduced. Under the proposed remedy, EPA will require the continued operation of the groundwater monitoring and recovery wells, the SVE system, and on-site vapor and groundwater treatment unit until the constituents of concerns (COCs) in subsurface soil meet the PADEP's SHSs for non-residential use and groundwater meets the MCLs. In addition, EPA's proposed final remedy requires the implementation and maintenance of institutional controls to ensure that Facility property is not used for residential purposes and groundwater beneath Facility property is not used for any purpose.

2. **Achieve Media Cleanup Objectives** – The Facility's excavation and disposal activities and its installation and operation of the groundwater monitoring and recovery wells; the SVE system, and on-site vapor and groundwater treatment unit have greatly reduced the levels of hazardous constituents in the soil and groundwater at the Facility. While EPA's corrective action objectives have not been met yet, EPA anticipates that the continued operation of those remedial components will achieve those objectives. Further, EPA's proposed final remedy requires the implementation and maintenance of institutional controls to ensure that Facility property is not used for residential purposes and groundwater beneath Facility property is not used for any purpose.

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. Univar began remediating the source of releases by excavating and disposing of 1500 cubic yards of contaminated soil from the AST area and by installing and operating the groundwater monitoring and recovery wells; the SVE system, and on-site vapor and groundwater treatment unit. EPA's proposed remedy requires the continued

operation of the remediation systems and monitoring of groundwater and soil to demonstrate progress or determine if additional measures are necessary.

B. Balancing/Evaluation Criteria

4. **Long-Term Effectiveness** - The proposed remedy will maintain protection of human health and the environment over time 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 restrictions at the Facility. EPA anticipates that the land use and groundwater use restrictions will be implemented through an environmental covenant to be recorded with the deed for the Facility property. The environmental covenant will run with the land and as such, will be enforceable by EPA and the State against future land owners.
5. **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 soil excavation, and ongoing groundwater monitoring and treatment and soil vapor extraction and treatment.
6. **Short-Term Effectiveness** - EPA's proposed final remedy does not involve any additional activities, such as construction or excavation that would pose short-term risks workers, residents, and the environment. In addition, EPA anticipates that the land use and groundwater use restrictions will be fully implemented shortly after the issuance of the Final Decision and Response to Comments (FDRTC).
7. **Implementability** - EPA's proposed remedy is readily implementable. The groundwater monitoring and recovery wells; the SVE system, and on-site vapor and groundwater treatment unit are already installed and operational. EPA does not anticipate any regulatory constraints in requiring the continued operation, maintenance and monitoring activities nor in the implementation of the proposed ICs.
8. **Cost** - The capital costs associated with the installation of the groundwater monitoring and recovery wells; the SVE system, and on-site vapor and groundwater treatment unit have already been incurred. The remaining cost for O &M of monitoring and recovery is approximately \$28,000 annually.
9. **Community Acceptance** - EPA will evaluate community acceptance of the proposed remedy during the public comment period and will describe community acceptance in the FDRTC.
10. **State/Support Agency Acceptance** - EPA will evaluate State acceptance of the proposed remedy during the public comment period and will describe the State's position in the FDRTC.

VII. Environmental Indicators

Under the Government Performance and Results Act (GPRA), EPA has set national goals to address RCRA Corrective Action facilities. Under GPRA, EPA evaluates two key environmental cleanup indicators for each facility: (1) Current Human Exposures Under Control and (2) Migration of Contaminated Groundwater Under Control. EPA determined that both environmental indicators are under control and approved the PADEP evaluation of these indicators on June 21, 1999. These approved environmental indicator determinations are available at:

<http://www.epa.gov/reg3wcmd/ca/pa/pdf/pad061779815.pdf>.

VIII. Financial Assurance

Univar will demonstrate and maintain financial assurance to secure that the remediation efforts at current levels will continue until the remediation standards described in Section V are met.

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
Mail code: 3LC30
Philadelphia, PA 19103
Contact: Mr. Khai Dao
Phone: (215) 814-5467
Fax: (215) 814-3113
Email: dao.khai@epa.gov

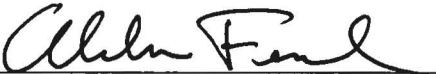
and

PADEP Southwest Regional Office
400 Waterfront Drive
Pittsburgh, PA 15222
Phone: (412) 442-4000

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 Mr. Khai Dao. EPA will hold a public meeting to discuss this proposed decision upon request. Requests for a public meeting should be made to Mr. Khai Dao.

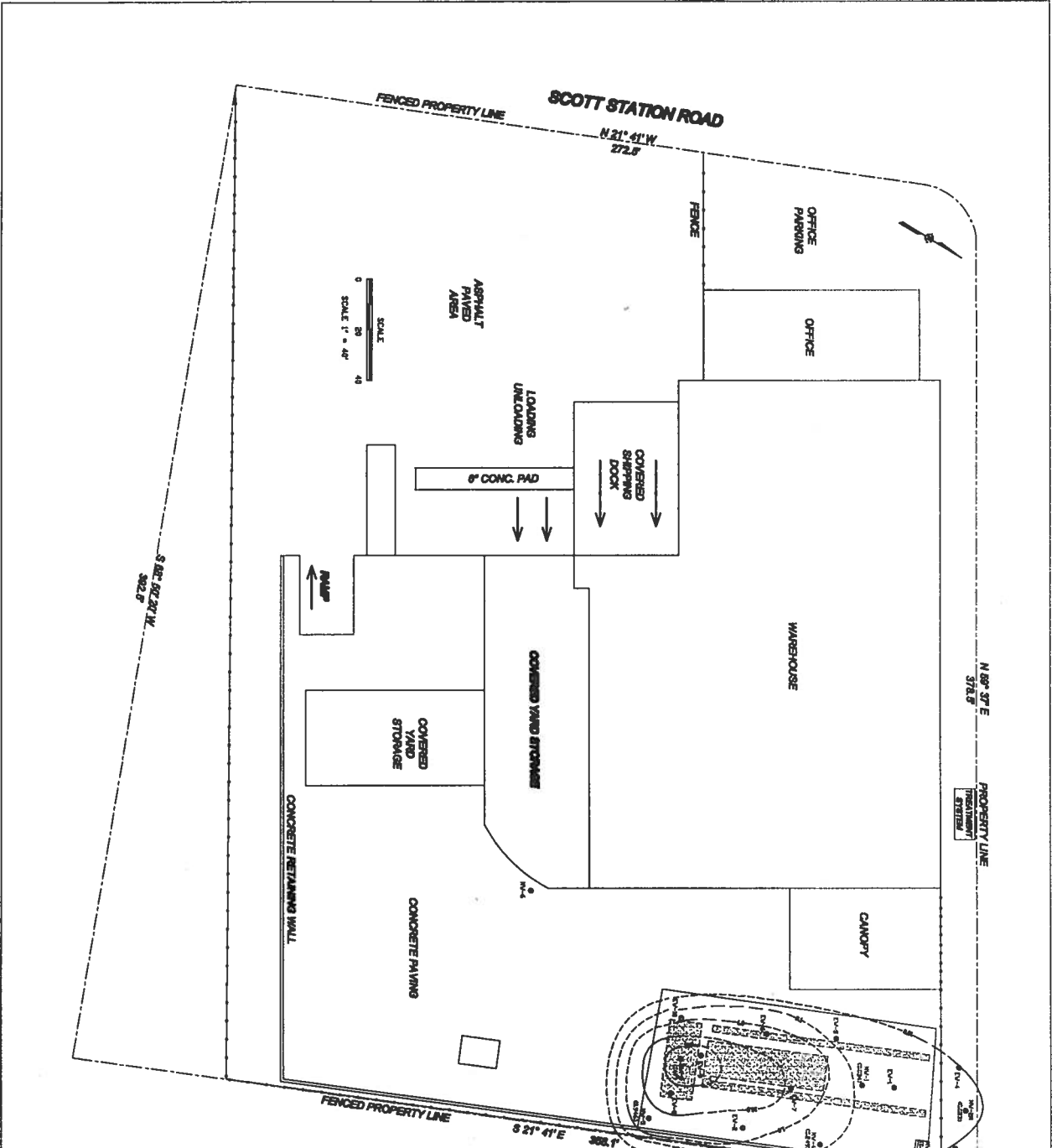
EPA will respond to all relevant comments received during the comment period. If EPA determines that new information warrant a modification to the proposed decision, EPA will modify the proposed decision or select other alternatives based on such new information and/or public comments. EPA will announce its final decision and explain the rationale for any changes in the FDRTC. All persons who comment on this proposed decision will receive a copy of the FDRTC. Others may obtain a copy by contacting Mr. Khai Dao at the address listed above.

7/2/12
Date


Abraham Ferdas, Director
EPA Region III
Lands and Chemicals Division

Attachment A: Figure 1 Facility Layout

Attachment A



- LEGEND**
- (0.946) VOCs in (mg/L)
 - VOCs Contour
 - HV-5 Ground Water Monitoring Well
 - EV-8 Ground Water Extraction Well
 - ☉ Soil Vapor Extraction Trench
 - ⊙ Recovery Well

DRAWING NO. UNIVAR-E29 | FIGURE NO.

TOTAL VOC ISOCONCENTRATION MAP
(DECEMBER 2011)

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CORAOPOLIS, PENNSYLVANIA

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