EXPLANATION OF SIGNIFICANT DIFFERENCES
UNIVAR SOLUTIONS, INC.
CORAOPOLIS, PENNSYLVANIA
EPA ID#: PAD061779815

I. INTRODUCTION

This Explanation of Significant Differences (ESD) describes the United States Environmental Protection Agency's (EPA's) proposed modifications to its September 4, 2012 Final Decision in which EPA selected a final remedy (Final Remedy) pursuant to EPA's Corrective Action Program under the Solid Waste Disposal Act, commonly referred to as the Resource Conservation and Recovery Act (RCRA), as amended, 42 U.S.C. Sections 6901 to 6992k, for the Univar Solutions, Inc. (Univar) facility located at 6000 Casteel Drive, Coraopolis, PA 15108 (Facility). The Final Remedy for the Facility includes: (1) groundwater monitoring and remediation to drinking water standards, (2) implementation of the soil vapor extraction (SVE) system until subsurface soil attains the Pennsylvania Non-Residential Statewide Heath Standards (SHSs), and (3) compliance with and maintenance of institutional controls that prohibit groundwater use and restrict land use to non-residential uses at the Facility.

With this ESD, EPA proposes to modify the groundwater component of the Final Remedy from pump and treat to monitored natural attenuation and the soil component of the Final Remedy by eliminating the requirement to operate and maintain the soil vapor extraction (SVE) system. This ESD also requires periodic inspection and maintenance of the concrete slab inside the warehouse and the activity and use limitations as listed in Section III.

EPA has determined that the Final Remedy, as modified by this ESD, will remain protective of human health and the environment. This ESD and the documents supporting its issuance are part of the Administrative Record for the Facility, which is located at the EPA Region III, RCRA Records Center, 4 Penn Center, 1600 JFK Blvd, Philadelphia, Pennsylvania.

II. SUMMARY OF SITE HISTORY, CONTAMINATION AND THE FINAL REMEDY

A. Site History

The Facility is located at 6000 Casteel Drive in Coraopolis, Allegheny County, Pennsylvania, and is approximately three acres. The Facility was used as a solvent distribution service center by McKesson Chemical Company (McKesson) in 1964. McKesson stored chemical products in ten above-ground storage tanks (ASTs). The Facility was purchased by Univar in 1989. In 2002, Univar terminated the solvent distribution service operations and decommissioned the ten ASTs as part of facility closure activities. Currently, Univar retains ownership of the Facility, which

includes the warehouse building, remediation shed, and other Facility infrastructure. The warehouse building on the Facility property is leased to a landscaping supply company.

B. Contamination

The primary contaminants in groundwater and subsurface soil at the Facility are volatile organic compounds (VOCs). The constituents of concern (COCs) are 1,1-Dichloroethane; 1,1-Dichloroethene; cis-1,2-Dichloroethene; Tetrachloroethene; 1,1,1-Trichloroethane; Trichloroethylene (TCE), and Vinyl Chloride. Historical remedial activities included excavation and disposal of contaminated soil and the operation of the SVE and groundwater treatment systems to remediate subsurface soil and groundwater. Most of the sources of contamination that contributed to groundwater contamination were removed. Univar excavated 1,500 cubic yards of contaminated soil and disposed it off-Facility. The excavated area was backfilled and capped with a concrete slab. There are no direct exposures to the subsurface soil contamination. Since the initial investigation in 1990, VOC concentrations in subsurface soil and groundwater have reduced significantly. From 2001 to 2016, 493 pounds (lbs) of VOCs were recovered by the SVE system, and 2,436 lbs were recovered from groundwater for a total of 2,929 lbs of recovered VOCs. Despite several attempts to optimize and upgrade both systems' performance, mass removal rates substantially declined by 90% by 2011, and VOCs reached asymptotic levels in subsurface soil and groundwater in 2013. Therefore, active treatment is no longer an effective means to remediate subsurface soil and groundwater.

After almost 25 years of active remediation, and with EPA's approval, Univar deactivated the SVE and groundwater extraction systems to evaluate the groundwater contamination under static conditions. Univar conducted ten quarters of groundwater monitoring and surface water sampling in Montour Run, located downgradient of the Facility. The groundwater data indicate that residual VOC soil contamination that remains in the subsurface soil does not pose a significant impact to groundwater. Under groundwater static conditions the groundwater plume has remained stable and/or declining and has not migrated off-Facility. Furthermore, statistical trend analysis of the groundwater data demonstrates that the VOC concentrations in groundwater will continue to decrease through natural attenuation. Surface water results confirmed that Montour Run is not impacted by the Facility groundwater contamination. On-site groundwater use at the Facility is prohibited. In addition, there are no off-Facility groundwater wells located within a mile radius of the Facility. A local ordinance also prevents the installation of new domestic groundwater wells, and any new development in North Fayette Township is required to be connected to a public water system. Therefore, there are no direct exposure pathways to the Facility groundwater contamination.

In 2020, Univar conducted a risk assessment to evaluate the exposure risks for indoor air vapor intrusion associated with the Facility groundwater contamination. Five sub-slab soil gas samples and co-located indoor air samples were collected throughout the warehouse. TCE was detected in two of five sub-slab soil gas samples at concentrations of 39 and 279 micrograms per cubic meter (µg/m3), which exceed the conservative target Vapor Intrusion Screening Level (VISL) of 29 micrograms per cubic meter (µg/m3). The samples are located at the edge of the warehouse closest to the historical impact areas and furthest from the occupied office spaces. No other compounds were detected above screening levels in the sub-slab soil vapor. The co-located

indoor air samples for TCE were below the EPA Target Indoor Air Concentration of 0.876 ug/m^3 and the Pennsylvania Act 2 Target Indoor Air Concentration of 8.8 mg/m^3. The presence of TCE in indoor air indicates there may be a complete indoor air pathway associated with groundwater impacts, but at this time, the levels detected do not pose an unacceptable risk to human health. To ensure minimal impact from TCE vapor intrusion in the future, periodic inspections and maintenance of the concrete slab inside the warehouse are necessary. Any cracks that appear over time in the concrete slab should be repaired and filled.

C. Final Remedy

The Final Remedy requires the following actions:

1. Subsurface Soils

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

2. Groundwater

   a. the continuation of contaminant removal and hydraulic containment through operation and maintenance of the existing pump and treat system;
   b. 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;
   c. 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
   d. 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.

III. DESCRIPTION OF SIGNIFICANT DIFFERENCES AND THE BASIS FOR CHANGES TO THE FINAL REMEDY

For the reasons described in Section II.B, above, EPA is proposing with this ESD:

1. that the groundwater component of the Final Remedy be modified to natural attenuation with monitoring at well locations MW-1, MW-2R, MW-4, MW-5, and MW-8 at an adjusted sampling frequency determined by EPA that is representative of the onsite groundwater conditions. Sampling will continue until EPA provides written approval that the 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. § 300g-1 have been attained for the COCs;
2. that the soil component of the Final Remedy be modified to eliminate the requirement to operate and maintain the SVE system;
3. periodic inspection and maintenance of the concrete slab inside the warehouse to ensure that indoor air TCE levels do not pose an unacceptable health risk, and

4. that the following activity and use restrictions replace those listed in Section 5 of the environmental covenant recorded on the Facility property on August 1, 2013:
   a. Restrict the Property's use to non-residential use.
   b. Groundwater monitoring shall be conducted at the Facility property in compliance with an EPA-approved groundwater monitoring plan at well locations MW-1, MW-2R, MW-4, MW-5, and MW-8 at an adjusted sampling frequency determined by EPA that is representative of the onsite groundwater conditions until EPA provides written approval that the MCLs have been attained for the COCs.
   c. Areas of the Facility property containing soils above the Pennsylvania Department of Environmental Protection's (Department's) Non-Residential SHSs are not to be used even for non-residential purposes until the Department's Non-Residential SHSs are attained in those areas or it is demonstrated by EPA through an EPA-approved risk assessment that contaminant levels are low enough that such use does not pose a threat to human health or the environment or such use does not interfere with the Final Remedy.
   d. At least twice annually, the then-current Facility property owner shall visually inspect the warehouse building's concrete slab and notify EPA of any cracks or damage to the slab. Within thirty days of notifying EPA of any cracks or damage, the then-current Property owner shall perform any required maintenance to address the cracks or damage to the slab.
   e. Maintain the existing fence around the Property, including the fence around the remediation equipment, until EPA determines that the remediation is complete.
   f. Prohibit the use of on-site groundwater at the Property for any purpose.

IV. SUPPORT AGENCY REVIEW

EPA has consulted the Department regarding the proposed modifications to the Final Remedy for the Facility as described above. The Department concurs with the modifications.

IV. AFFIRMATION OF DECLARATION

EPA has determined that the Final Remedy, as modified by this ESD, would remain protective of human health and the environment.

V. PUBLIC PARTICIPATION

EPA is requesting comments from the public on this ESD. The document is available for public review at the location listed in Section VII below and at https://www.epa.gov/pa/epa-public-notices-pennsylvania. The public comment period will last thirty (30) calendar days from the date EPA places an announcement in the *Pittsburgh Tribune-Review* to notify the public of the ESD. Comments on, or questions regarding, the ESD may be submitted to:

Mr. Khai Dao
U.S. Environmental Protection Agency
Region III (3LD20)
4 Penn Center
1600 JFK Blvd.
Philadelphia, PA 19103

Telephone: (215) 814-5467
Email: dao.khai@epa.gov

EPA will respond to all comments received. Based on the comments received or other relevant information, if EPA makes minor changes to the modifications proposed in this ESD, the proposed modifications to the Final Remedy will become effective upon those changes being made. If, based on comments received or other relevant information, EPA makes significant changes to the proposed modifications, EPA may seek additional public comments. All comments received during the thirty (30)-day comment period will become part of the Administrative Record for the Facility, as will EPA responses to the significant comments.

VI. ADMINISTRATIVE RECORD

The Administrative Record supporting the issuance of this ESD is available for public review on Monday through Friday, from 9:00 a.m. to 5:00 p.m., by contacting the EPA Project Manager, Mr. Dao, at:

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