

SUBJECT: Long-term Stewardship Univar Solutions, Inc. (Univar) EPA ID: PAD061779815 6000 Scott Rd. Coraopolis, PA 15108

DATE: September 8, 2023

- TO: Alizabeth Olhasso, Manager RCRA CA South Section
- FROM: Khai Dao, RPM RCRA CA South Section

Introduction:

Long-term stewardship (LTS) refers to the activities necessary to ensure that engineering controls (ECs) are maintained and that institutional controls (Ics) continue to be enforced. The purpose of the EPA Region 3 LTS program is to periodically assess the efficacy of the implemented remedies (i.e., ECs and ICs) and to update the community on the status of the RCRA Corrective Action facilities. The assessment is conducted in twofold, which consists of a record review and a field inspection, to ensure that the remedies are implemented and maintained in accordance with the final decision.

Remedy Assessment Summary:

Active remediation that involved groundwater extraction and soil vapor extraction (SVE) was an effective remedy that significantly reduced volatile organic compounds (VOCs) concentrations by 90% in subsurface soil and groundwater at the Property. However, after 24 years of remediation and despite several attempts to optimize and upgrade the systems, contaminant levels in subsurface soil and groundwater reached asymptotic conditions that diminished active remediation as an effective means to remediate subsurface soil and groundwater. With EPA's approval, Univar deactivated the SVE and groundwater extraction systems in 2016 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 Property. Surface water results confirmed that Montour Run is not impacted by the groundwater contamination. 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-Property. Statistical trend analysis of the groundwater data demonstrates that the VOC concentrations in groundwater will continue to decrease through natural attenuation.

In 2022, the United States Environmental Protection Agency's (EPA) issued an Explanation of Significant Differences (ESD) that modified its September 4, 2012, Final Decision in which EPA selected a Final Remedy for the Univar facility. The original Final Remedy for the Property included: (1) groundwater monitoring and remediation to drinking water standards, (2) implementation of the SVE system until subsurface soil attains the Pennsylvania Non-Residential Statewide Heath Standards

Printed on 100% recycled/recyclable paper with 100% post-consumer fiber and process chlorine free. Customer Service Hotline: 1-800-438-2474 (SHSs), and (3) compliance with and maintenance of institutional controls that prohibit groundwater use and restrict land use to non-residential uses at the Property.

The ESD modified the groundwater component of the original 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. Groundwater monitoring is conducted at the Property 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 Maximum Contaminant Levels (MCLs) have been attained for the constituents of concern (COCs) that include 1,1,1-Trichloroethane, 1,1-Dichloroethane, 1,1-Dichloroethene, Tetrachloroethene, Trichloroethene, and Vinyl Chloride.

The ESD also requires periodic inspection and maintenance of the concrete slab inside the warehouse, maintaining the existing fence around the Property, and activity and use limitations executed under an environmental covenant that restricts land use to non-residential use and prohibits groundwater use at the Property. Based on the site visit and file review information gathered, EPA concludes that the Facility is meeting the objectives of the 2022 EPA ESD.

Facility Background:

The Property is approximately 3 acres in size and is located at 6000 Scott Rd., Coraopolis, Pennsylvania. A layout of the Property is presented in Exhibit B. 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 Property is a warehouse and office space that are leased to a landscaping company.

Long-term Stewardship Site Visit:

On July 27, 2023, EPA conducted a long-term stewardship site visit with PADEP and Univar's contractor to evaluate the conditions of the Property and assess the integrity of the monitoring wells.

Name	Organization	Email Address	Phone No.
Khai M. Dao	USEPA	dao.khai@epa.gov	(215) 814-5467
Matthew Barch	PADEP	mabarch@pa.gov	(412) 442-4159
Thomas Dickey	Arcadis U.S., Inc.	Thomas.Dickey@arcadis.com	(724) 996-7845

The attendees were:

Current Site Status:

Univar no longer operates a solvent distribution service center at the Property. The operation was decommissioned under PADEP. Presently, Univar leases the warehouse and office space on the Property to a landscaping company.

Univar will continue to monitor natural attenuation in groundwater to assess the natural degradation of the COCs to meet the groundwater cleanup goals of the MCLs and to ensure that the groundwater plume remains stable. In addition, Univar will maintain the exterior fence around the Property to safeguard the integrity of the monitoring wells and periodically inspect and maintain the flooring inside the warehouse and the exterior concrete cover located in the area of the former ASTs.

Field Inspections:

EPA and PADEP representatives and Univar's contractor conducted a field inspection of the Property. The warehouse building and office space are lease to a landscaping company that uses the Property for product storage and logistics for running their operations.

The areas of the field inspection included the warehouse flooring, the monitoring wells, the exterior fence, and the exterior concrete cover that serves as cap over the subsurface soil contamination that is in the area of the former ASTs. The concrete flooring in the warehouse appears to be in good condition. Observations of the exterior concrete cover indicate that the cap is intact and stable. The well caps for a few wells, including extraction and monitoring wells, were unlocked or were unable to be locked. A working security cap should be maintained for these wells. Wells that do not have a functional purpose such as groundwater monitoring or measurement of groundwater elevation should be considered for decommission.

Follow-up Activities:

Univar will repair or replace the security caps for some of the wells. Univar will also assess the remaining wells to determine whether certain well will require decommission. As a follow-up to the ESD, Univar will revise and finalize the environmental covenant to reflect some of the changes to the original 2012 Final Remedy.

Financial Assurance:

The cost to implement periodic groundwater sampling for the five onsite monitoring wells is minimal. EPA determines that financial assurance is not required.

Reporting Requirements/Compliance:

Periodic groundwater monitoring reports are submitted to EPA and PADEP to assess the efficacy of natural attenuation to degrade the COCs and to confirm groundwater plume stabilization.

Mapping:

The property boundary has been geospatially mapped. A downloadable geospatial PDF map is available at the Facility's EPA Factsheet (<u>https://www.epa.gov/hwcorrectiveactioncleanups/hazardous-waste-cleanup-univar-usa-incorporated-formerly-vopak-usa</u>) under the "Reports, Documents and Photographs" section.

Conclusions and Recommendations:

EPA has determined that Univar is in compliance with EPA's revised remedy decision stated in the ESD. EPA concludes that the implemented engineering and institutional controls are effective in

meeting the objectives of protection of human health and the environment. Univar will continue to conduct groundwater monitoring and inspect and maintain the integrity of the concrete flooring in the warehouse and exterior fence in accordance with the ESD.

Files Reviewed:

U.S. EPA Explanation of Significance Difference June 2022. Univar Environmental Covenant, June 13, 2013. Site Assessment Report Transition to Monitored Natural Attenuation at Former Univar Solutions Coraopolis Facility, Prepared by Arcadis, May 13, 2022. Univar Statement of Basis, Prepared by EPA July 2012.



Engineering Control/Institutional Control Corrective Action Remedy Summary

Facility Name	Univar Solutions, Inc.						
Address	6000 Scott Rd., Coraopolis, PA 15108						
EPA ID Number	PAD06	PAD061779815					
Are there restrictions or controls that address:	Yes	No	Areas	Description of restrictions, controls, and mechanism			
Groundwater	x		Entire Property	Prohibits GW use via EC.			
Residential Use	x		Entire Property	Restrict to non-residential use via EC.			
Excavation	x Defined area of subsurface soil contamination near vicinity of former ASTs.		Defined area of subsurface soil contamination near vicinity of former ASTs.	Limits soil excavation via EC.			
Vapor Intrusion	x		Warehouse bldg.	Periodic inspection and maintenance of concrete floor as a precautionary measure via ESD and EC.			
Capped Areas	x		Defined area of subsurface soil contamination near vicinity of former ASTs.	Periodic inspection and maintenance of concrete cap via ESD and EC.			
Other Engineering Controls	x		Groundwater monitoring	Monitored natural attenuation via ESD and EC.			
Other Restrictions		х					

LTS Checklist Template

IC Review and Assessment Questions:		<u>No</u>	<u>Notes</u>
• Have the ICs specified in the remedy been fully implemented? Implementation mechanism in place?	х		
• Do the ICs provide control for the entire extent of contamination (entire site or a specific portion)?	x		
 Are the ICs eliminating or reducing exposure of all potential receptors to known contamination? 	х		
• Are the ICs effective and reliable for the activities (current and future) at the property to which the controls are applied?	x		
• Have the risk of potential pathway exposures addressed under Corrective Action changed based on updated screening levels and new technologies?		х	
• Are modifications to the IC implementation mechanism needed? (i.e., UECA Covenant, Permit or Order)	x		Update EC to reflect modifications reflected in the ESD.
 Are there plans to develop or sell the property? 		х	
Have all reporting requirements been met?	x		

Groundwater Review and Assessment Questions:	<u>Yes</u>	<u>No</u>	<u>Notes</u>
 Is groundwater onsite used for potable purposes? 		х	
 Is the Facility connected to a public water supply? 	х		
 Have any new wells been installed at the facility? 		х	
• Are the current groundwater flow rate and direction similar as mentioned in the previous studies?	x		
 Groundwater contaminants stable or decreasing in concentration? 	х		
• Are groundwater monitoring wells still in place (# wells)?		х	
• Any evidence or reason to re-evaluate the number and location of monitoring points and/or monitoring frequency?		х	

 For wells where groundwater monitoring is no longer required, have the wells be decommissioned? 		х	Univar will assess the purpose of these wells for potential decommission.
 Is there evidence of monitored natural attenuation occurring in groundwater? 	х		
• Has (active remediation system) been maintained as necessary?		х	N/A – No active remediation required.
• Is the (groundwater containment system) effectively containing COCs and protecting potential receptors (surface water body and/or groundwater resource) via hydraulic control?			N/A – No active remediation.
• Have notification letters been sent to the local POTW, County Department of Health, and Planning and Zoning Department regarding groundwater use restrictions?	x		

Surface and Subsurface Soil Review and Assessment Questions:	<u>Yes</u>	<u>No</u>	<u>Notes</u>
 Is the facility being used for residential purposes? 		х	
• Have there been recent construction or earth- moving activities or plans for such?		x	

Engineered Cap or Cover Review and Assessment	Yes	No	Notes
Questions:			
 Have geosynthetic/vegetative landfill caps (name) been properly maintained? 	х		Concrete cap is periodically inspected and maintained.
 Have any repairs been necessary? (i.e., regrading, filling, root removal) 		х	
• Is the leachate collection system operating and effectively preventing groundwater contamination?		х	N/A

Vapor Intrusion Review and Assessment Questions:	<u>Yes</u>	<u>No</u>	<u>Notes</u>
• Have there been construction of new structures within the vapor intrusion restriction zone(s)?		х	
• Is the vapor intrusion mitigation system radius of influence effective for the structure in which its installed?			N/A. Currently no vapor intrusion issues. Precautionary measures to inspect and maintain

		integrity of concrete flooring in warehouse.
--	--	--

Miscellaneous Review and Assessment Questions:	<u>Yes</u>	<u>No</u>	<u>Notes</u>
 Is the security fence intact? 	х		
 Is the appropriate signage posted? 	х		