



pennsylvania

DEPARTMENT OF ENVIRONMENTAL PROTECTION
ENVIRONMENTAL CLEANUP AND BROWNFIELDS PROGRAM

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November 14, 2014

RECEIVED

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ICF International
PAUSTIF

Mr. Ned Franks
Graft Oil Company
2561 Memorial Boulevard
P.O. Box 899
Connellsville, PA 15425

Re: Site Characterization Report/Remedial Action Plan - Approval
Storage Tank System Release - April 19, 2002
Tank Facility ID No. 03-07315
Incident No. 19800
Honey Bear Mini Mart
200 McKean Street
Kittanning Borough, Armstrong County

Dear Mr. Franks:

The Department of Environmental Protection (Department) has reviewed the documents titled Site Characterization Report/Remedial Action Plan, dated October 2014, for the release referenced above. The documents were prepared by Insite Group, Inc. and submitted as a Site Characterization Report (SCR) and Remedial Action Plan (RAP) as required by 25 Pa. Code § 245.310 and § 245.311, respectively. You selected the residential Statewide health standard as the remediation standard for soil and groundwater.

The facility is an active retail gasoline dispenser and convenience store operated by Graft Oil since 1989. The facility has historically been operated as an automotive service station and retail gasoline dispenser since the 1940s.

During closure and removal of a former gasoline UST system in June 2002, impacted soils were discovered under product piping at the dispenser island, along the piping trench, and at the corner of the UST cavity where the piping entered the UST cavity. Interim remediation and site characterization activities were initiated in June 2002. To remove source area impacts, approximately 473 tons of contaminated soil were excavated from beneath the former UST system in June 2002 and properly disposed.

A groundwater pump and treat system was installed under interim action and operated from September 2004 to March 2010; approximately 2,065,728 gallons of contaminated groundwater were extracted and treated during this period. Approximately 82 gallons of separate-phase liquid were removed from wells on the site using passive absorbents and vacuum extraction between

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August 2004 and April 2010. Separate-phase liquid has not been detected at the site since April 2010.

Soil borings and monitoring wells were installed in April and May of 2004 in an attempt to define the extent of soil and groundwater impact. A Site Characterization Report and Remedial Action Plan were submitted by Insite Group, Inc. in September and November 2006, respectively. Additional soil borings, monitoring wells, and test wells were installed during investigations conducted in February 2011, June 2012, and July 2012 to complete soil vertical profiling, and to facilitate treatability studies and pilot testing. Additional monitoring wells were installed in October 2013, at the request of the Department (May 2013 memorandum), to complete vertical delineation of groundwater impact. Soil vapor sampling was conducted in March 2005 and August 2014; results did not indicate vapor intrusion issues.

The October 2014 SCR/RAP indicates soil impact remains in the vadose zone underlying part of the site property, and likely under a portion of McKean Street to the south, primarily in the saturated zone, at depths ranging from 12 to 20 feet. Due to a highly variable water table, a thick smear zone of contaminants is present in the soils at the site. Groundwater impact includes much of the Graft Oil property, extending under McKean Street, and under a portion of a property to the southwest utilized as the Kittanning area Post Office.

Treatability studies and pilot testing conducted by Insite Group, Inc. between June 2012 and March 2014 included application of the oxidant Klorur[®] sodium persulfate and dual-phase vacuum extraction (DPVE). Planned remediation, based on site characterization and pilot testing results, involves DPVE system operation. DPVE was selected as the preferred remedial option because groundwater drawdown will expose the smear zone to treatment without the need for a more complex separate groundwater pumping and vapor extraction system. An initial DPVE system operating period of two years is proposed.

The Department approves the SCR and RAP in accordance with 25 Pa. Code § 245.311(b)(1).

25 Pa. Code § 245.312(a) specifies that remedial action shall be implemented upon approval of the RAP according to the schedule contained in the RAP. Remedial action should, therefore, commence immediately upon receipt of this letter and proceed in accordance with the schedule in the RAP until the selected remediation standard is attained.

Remedial Action Progress Reports must be submitted to the Department in accordance with Section 245.312(b-d) by the 30th day of the month following the end of each quarter (April 30, July 30, October 30, and January 30). The final RAPR is submitted as part of the Remedial Action Completion Report. Your first RAPR should be submitted no later than April 30, 2015.

Failure to implement remedial action or submit complete progress reports in accordance with the schedule outlined above may result in enforcement action by the Department. If you wish to modify any part of this RAP or select a new remediation standard, you must prepare and submit a new or modified RAP to the Department in accordance with Section 245.312(e).

Any person aggrieved by this action may appeal, pursuant to Section 4 of the Environmental Hearing Board Act, 35 P.S. Section 7514, and the Administrative Agency Law, 2 Pa.C.S. Chapter 5A, to the Environmental Hearing Board, Second Floor, Rachel Carson State Office Building, 400 Market Street, P.O. Box 8457, Harrisburg, PA 17105-8457, 717.787.3483. TDD users may contact the Board through the Pennsylvania Relay Service, 800.654.5984. Appeals must be filed with the Environmental Hearing Board within 30 days of receipt of written notice of this action unless the appropriate statute provides a different time period. Copies of the appeal form and the Board's rules of practice and procedure may be obtained from the Board. The appeal form and the Board's rules of practice and procedure are also available in braille or on audiotape from the Secretary to the Board at 717.787.3483. This paragraph does not, in and of itself, create any right of appeal beyond that permitted by applicable statutes and decisional law.

~~IF YOU WANT TO CHALLENGE THIS ACTION, YOUR APPEAL MUST REACH THE BOARD WITHIN 30 DAYS. YOU DO NOT NEED A LAWYER TO FILE AN APPEAL WITH THE BOARD.~~

IMPORTANT LEGAL RIGHTS ARE AT STAKE, HOWEVER, SO YOU SHOULD SHOW THIS DOCUMENT TO A LAWYER AT ONCE. IF YOU CANNOT AFFORD A LAWYER, YOU MAY QUALIFY FOR FREE PRO BONO REPRESENTATION. CALL THE SECRETARY TO THE BOARD (717.787.3483) FOR MORE INFORMATION.

If you have questions, please contact me at 412.442.4081 or by email to mshaheen@pa.gov.

Sincerely,



Mark Shaheen, P.G.
Licensed Professional Geologist
Environmental Cleanup and Brownfields

cc: Ms. Sara Giordano, Ph.D. – Insite Group, Inc.
Mr. Gerald Hawk, P.G. – ICF International (USTIF Claim No. 2002-0197(M))