



pennsylvania
DEPARTMENT OF ENVIRONMENTAL
PROTECTION

October 31, 2017

Certified Mail # 7016 2070 0000 5050 4384



Ms. Michele Shell
Former Route 119 Amoco
202 Center Wood Circle
Uniontown, PA 15401

Re: Supplemental Site Characterization and Remedial Action Plan – Approval with
Modifications
Storage Tank System Release: May 13, 1996
Facility ID No. 26-18711
USTIF Claim No. 1996-0116
Former Route 119 Amoco
1809 University Drive (Route 119), Dunbar, PA 15401

Dunbar Township, Fayette County

Dear Ms. Shell:

The Department has reviewed the Supplemental Site Characterization (SSCR) and Remedial Action Plan (RAP) submitted on your behalf by Converse Consultants on September 18, 2017, regarding the proposed remediation of contamination resulting from a release of a regulated substance at the above-referenced facility. The release occurred on May 13, 2017. This release was initially detected as a result of Underground Storage Tank (UST) tank handling activities. The Pennsylvania Department of Environmental Protection (Department) has reviewed the Supplemental Site Characterization (SSCR) and Remedial Action Plan (RAP) regarding desired modifications to the remedial actions, based on an evaluation of the current site conditions.

The property has operated as a retail gasoline sales facility since 1973. There were previously five (5) Underground Storage Tanks (USTs) located at the property: two (2) 8,000-gallon gasoline USTs, one (1) 4,000-gallon gasoline UST, one (1) 1,000-gallon kerosene UST, and one (1) 550-gallon heating oil UST. The USTs were removed on February 2, 2005. Over 86 tons of soil was removed during the tank closure activities. The initial petroleum release was discovered in 1996, due to the presence of unusual levels of gasoline vapors and stained soils, which was discovered during piping upgrades. The release was a result of loose coupler connections on the piping. The surrounding area is mixed open land, residential and commercial.

Site characterization was started in May 1996, in response to the detection of strong petroleum odors and stained soils. Initial investigations included sixteen (16) soil borings, installation of six (6) groundwater monitoring wells and two (2) recovery wells, laboratory analysis of soil and groundwater samples, aquifer characterization, data interpretation remedial alternatives screening and report preparation. Also, an Air Sparge/Soil Vapor Extraction system was installed to treat the on-site contamination. The results of the initial site characterization were provided in an Site Characterization Report (SCR) and Remedial Action Plan (RAP) that were submitted on May 4, 1998. The Department approved the original SCR and RAP in May 2001. Additional site characterization information was collected in September 2006, April 2011 and April 2012. An additional SCR was submitted in 2007, and approved with modifications on February 23, 2007.

In July 2005, site characterization activities were conducted (post tank removal), that included the installation of three (3) additional monitoring wells, collection of nineteen (19) soil samples, soil vapor sampling and groundwater monitoring. Additional plume delineation was completed with the installation of two (2) additional monitoring wells. These wells indicated that the groundwater contamination extended beyond the property boundary. Six (6) additional wells were installed in 2010, and benzene and MTBE were detected in the groundwater above the SHS. Soil sample results exceeded the SHS for benzene, toluene and naphthalene in the vicinity of the former UST cavity.

In 2014, the Supplemental Site Characterization and Remedial Action Plan activities commenced, which involved the drilling of soil borings to delineate soil contamination areas, and also included the installation of thirteen (13) additional shallow bedrock groundwater monitoring wells [(MW-10S, MW-12S, MW-13S, MW-18S, MW-19S, MW-20S, MW-21S, MW-22S, MW-23S, MW-24S, MW-25S, MW-26S and MW-27S)], and the installation of an additional soil vapor sampling point near the onsite building.

The site monitoring wells have been sampled for several quarterly intervals. Currently, groundwater monitoring in the shallow aquifer detected levels of benzene and MTBE above SHS (residential, used-aquifer) in downgradient wells during the groundwater sampling events. The contaminant plume extends some distance offsite.

Three soil vapor sampling points were installed in the area adjacent to the building (VP-1 through VP-4). All four vapor points were sampled in April and June 2010. All gasoline constituents were below the residential Soil Vapor MSC. Additional vapor sampling points should be installed and sampled. Future evaluations of the potential for petroleum vapor intrusion must be performed in accordance with the January 2017 Vapor Intrusion Guidance Manual.

The Department approves the Supplemental SCR and RAP in accordance with Section 245.310(c)(2), with the following modification(s):

- Completion of eight (8) additional rounds of groundwater sampling for site characterization purposes, attainment purposes, and to determine plume stability.
- LNAPL gauging, for the purposes of demonstrating LNAPL migration potential and thickness, and for potential recovery efforts, which should be initiated immediately. An interim response plan for the LNAPL recovery and gauging efforts should be submitted to the Department within the next sixty (60) days.
- Onsite and offsite vapor sampling was conducted near buildings and residential properties, and results indicated no vapor intrusion issues. However, these areas should be resampled and screened in accordance with the January 2017 Vapor Intrusion Guidance Manual.
- Submission of a DRAFT Environmental Covenant (EC), for review by the Department, within the next sixty (60) days, which includes the institutional controls that will be included in the source property covenant, as well as an indication as to whether offsite property owner(s) are willing to participate in any required ECs for their property(ies).

The Department approves the Supplemental SCR and RAP, with modifications, 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 (January 30, April 30, July 30 and October 30). The final RAPR is submitted as part of the Remedial Action Completion Report. Your first RAPR should be submitted no later than January 30, 2018.

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 Patricia Renwick of my staff 412-442-4082 or by email to prewick@pa.gov.

Sincerely,



Kevin Halloran
Environmental Program Manager
Environmental Cleanup & Brownfields

cc: ICF International, Inc. - Bethany Smith (USTIF)
Converse Consultants – Mary Feerrar