

DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

Interim Final 2/5/99

RCRA Corrective Action
Environmental Indicator (EI) RCRIS code (CA750)

Migration of Contaminated Groundwater Under Control

Facility Name: M.A. Bruder & Sons, Inc
Facility Address: 52nd & Grays Ave, Philadelphia PA 19143
Facility EPA ID #: PAD 069020691

- I. Has all available relevant/significant information on known and reasonably suspected releases to the groundwater media, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units (SWMU), Regulated Units (RU), and Areas of Concern (AOC)), been **considered** in this EI determination?

X If yes - check here and continue with #2 below.
 If no - re-evaluate existing data, or
 If data are not available skip to #8 and enter "IN" (more information needed) status code

BACKGROUND

Definition of Environmental Indicators (for the RCRA Corrective Action)

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for nonhuman (ecological) receptors is intended to be developed in the future.

Definition of "Current Human Exposures Under Controls" EI

A positive "Current Human Exposures Under Control" EI determination ("YE" status code) indicates that there are no "unacceptable" human exposures to "contamination" (i.e., contaminants in concentrations in excess of appropriate risk-based levels) that can be reasonably expected under current land- and groundwater-use conditions (for all "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

Relationship of EI to Final Remedies

While Final remedies remain the long-term objective of the RCRA Corrective Action program, the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993 (GPRA). The "Migration of Contaminated Groundwater Under Control" EI pertains ONLY to the physical migration (i.e., further spread) of contaminated groundwater and contaminants within groundwater (e.g., non aqueous phase liquids or NAPLs). Achieving this EI does not substitute for achieving other stabilization or final remedy requirements and expectations associated with sources of contamination and the need to restore, wherever practicable, contaminated groundwater to be suitable for its designated current and future uses.

Duration / Applicability of EI Determinations

EI Determinations status codes should remain in RCRIS national database ONLY as long as they remain true (i.e., RCRIS status codes must be changed when the regulatory authorities become aware of contrary information).

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2. Is **groundwater** known or reasonably suspected to be "contaminated"¹ above appropriately protective risk-based "levels" (applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action anywhere at, or from, the facility?

X If yes – continue after identifying key contaminants, citing appropriate "levels," and referencing supporting documentation.

If no – skip to #8 and enter "YE" status code, after citing appropriate "levels," and referencing supporting documentation to demonstrate that groundwater is not "contaminated."

If unknown (for any media)– skip to #8 and enter "IN" status code.

Rationale and Reference(s):

The building currently is not occupied and there is an environmental covenant for the site.

The Data below is from the Act 2 Revised report submitted in November 2009.

Naphthalene was detected at 990 µg/l and 160 µg/l. The tapwater regional screening level is 0.17 µg/l (with a 10⁻⁶ risk level). With a 10⁻⁴ risk level is 170 µg/l. The groundwater on the site is not used due to an environmental covenant.

References:

“Final Report Former M.A. Bruder & Sons, Inc. Facility” Prepared by KU Resources, Inc for The Sherwin-Williams Company submitted to PADEP on September 2009, revised November 2009.

“Final Report Addendum Former M.A. Bruder & Sons, Inc. Facility” Prepared by KU Resources, Inc for The Sherwin-Williams Company submitted to PADEP on August 2010.

“Environmental Covenant” Submitted to Deed office by Sherwin Williams Company on August 2013.

¹"Contamination" and "contaminated" describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriate "levels" (appropriate for the protection of the groundwater resource and its beneficial uses).

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3. Has the **migration** of contaminated groundwater **stabilized** (such that contaminated groundwater is expected to remain within "existing area of contaminated groundwater"² as defined by the monitoring locations designated at the time of this determination)?

- X If yes - continue, after presenting or referencing the physical evidence (e.g., groundwater sampling/measurement/migration barrier data) and rationale why contaminated groundwater is expected to remain within the (horizontal or vertical) dimensions of the "existing area of groundwater contamination"²)
- _____ If no (contaminated groundwater is observed or expected to migrate beyond the designated locations defining the "existing area of groundwater contamination"²) - skip to #8 and enter "NO" status code, after providing an explanation.
- _____ If unknown - skip to #8 and enter "IN" status code.

Rationale and Reference(s):

Naphthalene was detected at 990 µg/l and 160 µg/l. The tapwater regional screening level is 0.17 µg/l (with a 10⁻⁶ risk level). With a 10⁻⁴ risk level is 170 µg/l. The groundwater on the site is not used due to an environmental covenant.

Naphthalene was detected above tapwater regional screening levels once in well MW-3. The well then had a detection of 160 µg/l.

References:

"Final Report Former M.A. Bruder & Sons, Inc. Facility" Prepared by KU Resources, Inc for The Sherwin-Williams Company submitted to PADEP on September 2009, revised November 2009.

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² "Existing area of contaminated groundwater" is an area (with horizontal and vertical dimensions) that has been verifiably demonstrated to contain all relevant groundwater contamination for this determination, and is defined by designated (monitoring) locations proximate to the outer perimeter of "contamination" that can and will be sampled/tested in the future to physically verify that all contaminated groundwater remains within this area, and that the further migration of "contaminated" groundwater is not occurring. Reasonable allowances in the proximity of the monitoring locations are permissible to incorporate formal remedy decisions (i.e., including public participation) allowing a limited area for natural attenuation.

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4. Does "contaminated" groundwater **discharge** into **surface water** bodies?

- If yes - continue after identifying potentially affected surface water bodies.
- If no - skip to #7 (and enter a "YE" status code in #8, if #7 = yes) after providing an explanation and/or referencing documentation supporting that groundwater "contamination" does not enter surface water bodies.
- If unknown - skip to #8 and enter "IN" status code.

Rationale and Reference(s):

References:

"Final Report Former M.A. Bruder & Sons, Inc. Facility" Prepared by KU Resources, Inc for The Sherwin-Williams Company submitted to PADEP on September 2009, revised November 2009.

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