

**DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION**  
Interim Final 2/5/99  
**RCRA Corrective Action**  
**Environmental Indicator (EI) RCRIS code (CA725)**  
**Current Human Exposures Under Control**

Facility Name: Univar USA, Inc.  
Facility Address: North Railroad St, Hummelstown, PA 17036  
Facility EPA ID #: PAD014231005

1. Has all available relevant/significant information on known and reasonably suspected releases to soil, groundwater, surface water/sediments, and air, 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?

- If yes – check here and continue with #2 below.
- If no – re-evaluate existing data, or
- If data are not available skip to #6 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 non-human (ecological) receptors is intended to be developed in the future.

**Definition of “Current Human Exposures Under Control” 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 “Current Human Exposures Under Control” EI are for reasonably expected human exposures under current land- and groundwater-use conditions ONLY, and do not consider potential future land- or groundwater-use conditions or ecological receptors. The RCRA Corrective Action program’s overall mission to protect human health and the environment requires that Final remedies address these issues (i.e., potential future human exposure scenarios, future land and groundwater uses, and ecological receptors).

**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. Are groundwater, soil, surface water, sediments, or air media known or reasonably suspected to be "contaminated"<sup>1</sup> 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 (from SWMUs, RUs or AOCs)?

	Yes	No	?	Rationale/Key Contaminants
Groundwater		<b>X</b>		No samples collected. No releases reported.
Air (indoors) <sup>2</sup>		<b>X</b>		Evaluation concluded vapor intrusion pathway not a concern.
Surface Soil (e.g., <2 ft)		<b>X</b>		Two samples collected at focused sampling during closure of the hazardous waste drum storage area. Methylene chloride and isopropanol were not detected. No releases reported.
Surface Water		<b>X</b>		No samples collected. No releases reported.
Sediment		<b>X</b>		No samples collected. No releases reported.
Subsurf. Soil (e.g., >2 ft)		<b>X</b>		No samples collected. No releases reported.
Air (outdoors)		<b>X</b>		Facility is no longer operating.

  X   If no (for all media) - skip to #6, and enter "YE," status code after providing or citing appropriate "levels," and referencing sufficient supporting documentation demonstrating that these "levels" are not exceeded.

       If yes (for any media) - continue after identifying key contaminants in each "contaminated" medium, citing appropriate "levels" (or provide an explanation for the determination that the medium could pose an unacceptable risk), and referencing supporting documentation.

       If unknown (for any media) - skip to #6 and enter "IN" status code.

**Rationale and Reference(s):**

The Univar USA, Inc. (Univar) facility is located at the intersection of North Railroad and Wall Streets in the Borough of Hummelstown, Dauphin County, Pennsylvania. The facility was initially operated by McKesson Chemical Company (MCC) from March 1963 through October 1986. Ownership prior to 1963 is unknown. In October 1986, the assets of MCC were purchased by DSW, Inc., a wholly-owned subsidiary of Univar located in Seattle, Washington. According to the Univar representative at the inspection, DSW was a holding company used during the MCC-Univar merger, and was dissolved shortly after the merger. Univar operated its chemical distribution branches under the name of Van Water &

<sup>1</sup> "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 appropriately protective risk-based "levels" (for the media, that identify risks within the acceptable risk range).

<sup>2</sup> Recent evidence (from the Colorado Dept. of Public Health and Environment, and others) suggest that unacceptable indoor air concentrations are more common in structures above groundwater with volatile contaminants than previously believed. This is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration necessary to be reasonably certain that indoor air (in structures located above (and adjacent to) groundwater with volatile contaminants) does not present unacceptable risks.

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Rogers (VW&R). Accordingly, the Hummelstown facility operated under the VW&R name until 2001 when the facility submitted a notification of name change to Pennsylvania Department of Environmental Protection (PADEP) changing the facility's name to Vopak USA, Inc. The facility representative indicated that the company then changed its name to Univar USA, Inc. in 2007; however, it was no longer operating at this location. Univar currently rents the facility to Exhibits, Graphics, Interiors (EGI), a company that specializes in planning, designing, and installing custom signs and displays. A chain link fence still surrounds the facility. Access to the former operational area is via two gates. One gate is located on the north end of the property along Wall Street, and the other gate is located north of the former chemical repackaging building along North Railroad Street. There is no known generation or management of hazardous wastes currently occurring onsite.

The property currently consists of three separate tracts, which are currently owned by Univar. The larger tract (Tract No. 1), on which the former operations were conducted, is approximately one acre. The facility also owns two additional tracts (Tract No. 2 and Tract No. 3) which are located across North Railroad Street to the east of the facility, along Swatara Creek. Tract No. 2 is approximately 0.5 acres and is partially wooded and partially asphalt covered. Tract No. 3 is approximately 0.3 acres and is asphalt covered. Both Tract No. 2 and Tract No. 3 were used by the facility for employee parking. Historically, the facility owned four parcels of land at the intersection of North Railroad and Wall Streets (Tract Nos. 1, 2, and 3 described above, and Tract No. 4, approximately 1 acre parcel, located directly west of Tract No. 1). After 2001, when all operations ceased at the facility due to reorganization, Univar sold 0.4-acres, the northern portion of Tract No. 4, to United Water of Pennsylvania (United Water) in October 2003. In August 2004, United Water purchased from Univar an additional 0.4-acre parcel, the southern portion of Tract No. 4, located directly west of the former facility along the Norfolk Southern railroad tracks.

MCC, the chemical distribution division of Foremost-McKesson, Inc., operated a repackaging and distribution center for industrial chemicals, including chlorinated and non-chlorinated solvents at the North Railroad Street facility. MCC also received drummed waste materials from outside customers, which were temporarily stored at the onsite hazardous waste drum storage area until sufficient quantities were obtained to transport the waste materials to other McKesson facilities for recycling. In November 1985, MCC ceased storing waste solvents awaiting recycling due to strong public opposition and the low level of anticipated business. After November 1985, no waste materials were received at this location, but the facility continued with repackaging and distribution of industrial chemicals, including raw solvents. The raw solvents were either received onsite via tanker trucks and pumped directly into the 6,000-gallon and 10,000-gallon aboveground storage tanks (ASTs) located directly north of the chemical repackaging building, or were received in 55-gallon drums that were stored onsite within the warehouse or the outside storage yard until they were distributed to customers. In October 1986, MCC was purchased by DSW (a wholly owned subsidiary of Univar). DSW continued to operate the facility as a distributor of industrial chemicals, including repackaging and distribution of raw solvents.

On August 14, 1980, MCC submitted to USEPA an initial Notification of Hazardous Waste Activity form as a hazardous waste generator and treatment facility. The application indicated that wastes classified under USEPA waste codes U002 (2-propanone), U154 (methanol), U159 (methyl ethyl ketone [MEK]), U220 (methylbenzene), U226 (1,1,1-trichloroethane [TCA]), U239 (xylene), and D002 (characteristically corrosive) would be generated/treated onsite. The facility subsequently was assigned USEPA ID No. PAD014231005.

Raw solvents, after being used by customers, became wastes. The facility offered its customers a service by arranging for recycling or disposal of these wastes, thereby brokering the wastes for its customers. This waste brokering service also managed damaged and off-specification materials (i.e., non-hazardous powders and liquids) other than waste solvents. In addition to customer wastes, the facility also managed self-generated wastes that resulted from product being damaged, product aging beyond its shelf life, or product residues resulting from the repackaging process. Wastes that were shipped by the facility to offsite permitted disposal facilities included D001 (flammable liquid, isopropyl alcohol, isopropanol/nonyl phenol ethoxylate, isopropanol/diethylene glycol, ethanol/methanol, and diesel fuel), D002 (cleaning liquid), and U226 (1,1,1-TCA and methylene chloride) wastes. The facility held only a hazardous waste permit (USEPA ID No. PAD014231005). No other permits (i.e., air quality or stormwater) were identified for this facility.

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One RCRA-regulated SWMU, the former hazardous waste drum storage area, existed at the facility. The hazardous waste drum storage area consisted of a 400-square foot uncovered, concrete pad located adjacent to (west of) the AST farm. Fifty-five (55) gallon drums of waste solvents were periodically stored in this area for subsequent transport to other MCC facilities for recycling. According to a PADEP internal memorandum dated July 28, 1986 and the facility's Closure Plan dated August 1986 (NUS, 1989), a total of 43 drums containing methylene chloride and isopropanol were stored at the SWMU on three separate occasions between January 31, 1984 and January 17, 1985. No spills/releases were reported nor was evidence of spills/releases observed by PADEP during a pre-closure inspection performed in 1986. The October 6, 1986 report documented closure activities (the analytical results for samples of wash water generated while cleaning the concrete pad and subsurface soil samples collected from beneath the concrete pad in the vicinity of observed cracks) and indicated that the analyzed constituents (isopropanol and methylene chloride) were not detected at measurable concentrations. The certified closure of the hazardous waste drum storage area was approved by PADEP in November 20, 1986. After closure work was completed, the area was used for general yard storage and storage of palletized 55-gallon drums of virgin industrial solvents. Observations made during the April 2010 site visit indicate that the concrete pad for the hazardous waste drum storage area remains in place, but has been paved over with asphalt.

Based on storage tank registration and closure documents obtained from PADEP, the facility dismantled its AST farm in August 1996. The AST farm was located north of the repackaging building. The AST farm contained four 10,000-gallon ASTs and five 6,000-gallon ASTs into which raw solvents (i.e., acetone, 1,1,1-TCA, methanol, MEK, ethyl acetate, isopropyl acetate, and propylene glycol) were pumped directly from tanker trucks. After the AST farm was dismantled in 1996, the concrete secondary containment wall was removed. The concrete pad for the AST farm remained in place, and the area was paved. The elevation of the paved area was increased to match the height of the loading ramp adjacent to the north side of the repackaging building. A six-inch high asphalt berm was constructed along the eastern fence line.

**Groundwater:** While the potential exists that unknown or unreported spills may have migrated through cracks in the concrete/paved surfaces of the facility's former operational areas, groundwater contamination is not suspected nor has it been identified. Limited sampling of soils beneath the former hazardous waste drum storage area, as well as samples of wash water generated while cleaning the concrete pad during closure of this area, showed that the chemicals analyzed were below analytical detection limits. Therefore, it is assumed these chemicals (isopropanol and methylene chloride) would not have migrated vertically into the underlying groundwater.

No evidence of spills/releases was noted during the PA site visit (NUS, 1989). Univar has not operated at the facility since 2001. There have been no known or reported releases that occurred on the interior portion of the property that would indicate groundwater had been impacted; therefore, there have been no groundwater investigations conducted at the facility. All neighboring properties are connected to the public water supply.

**Air:** No air emission sources were present at the former facility during its operation. Although no soil and groundwater investigations have been conducted at the site with the exception of limited soil sampling conducted beneath the hazardous waste drum storage area, there have been no reported releases and no visual evidence of releases have been documented. This is supported by a review of past site inspection reports conducted by the PADEP from 1981 through 2005, including a 1986 post-closure inspection report for the former drum storage area, which indicate that no spills/releases or violations have been reported. Lastly, the former hazardous waste drum storage area and AST farm are located greater than 100 feet from the current office building precluding exposure to workers in the current office building via the vapor intrusion pathway. Therefore, no indoor or outdoor air emission events are anticipated under the current commercial operating scenario.

**Soil:** No soil investigations are known to have been conducted onsite, with the exception of the 1986 focused soil sampling conducted during closure of the hazardous waste drum storage area. Two soil samples collected from beneath the concrete storage pad were analyzed for a limited number of chemicals, i.e., isopropanol and methylene chloride, which correspond to the wastes that were stored within this area. Methylene chloride and isopropanol were not detected at measurable concentrations in the soil samples. The facility was permitted to manage other wastes; however, as a result of

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a mix up in the facility's original permit application, all other permitted wastes were actually not wastes, but were virgin materials which included acetone; methanol; MEK; toluene; 1,1,1-TCA; and xylene (PADEP inspection report, November 10, 1981). There have been no reported or suspected releases, spills, or leaks at the site. In addition, a review of site inspection reports indicates that all 55-gallon drums of waste materials, formerly reported to have been stored in the hazardous waste drum storage area, were removed. After closure of the hazardous waste drum storage area, wastes were stored in the warehouse.

In 1996, the AST farm, which operated from 1981 through 1996, was dismantled. According to the facility representative, no soil sampling was conducted beneath the slab during closure, and the concrete slab remained in place.

The former operational area of the facility was and is currently covered with a concrete pad, which prevented any releases to the soil beneath the pad. A chain link fence still surrounds the site and access to the former operational area is via two gates which effectively prevents trespassers in this area. The majority of the site is paved precluding direct contact exposure to soils by all current or future receptor groups (i.e., site workers, trespassers, and/or residents).

**Surface Water/Sediment:** There are no known or reported releases to the storm sewer drains at this facility related to its former operations, and the facility has not operated at this location since 2001. The chemical quality of the underlying groundwater is unknown; however, there is no evidence that spills/releases have occurred during Univar's operations which could have migrated towards Swatara Creek. Note: United Water's (the local public water supplier) surface water intake is located approximately 900 feet downstream of the former facility, and its water treatment facility is located directly west of the former facility. United is required to monitor for 20 regulated volatile organic compounds (VOCs) annually. According to the PADEP Drinking Water Reporting System (DWRS, accessed October 18, 2010), none of the 20 VOCs were detected at the Hummelstown entry point in 2008, 2009, and 2010.

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3. Are there **complete pathways** between “contamination” and human receptors such that exposures can be reasonably expected under the current (land- and groundwater-use) conditions?

Summary Exposure Pathway Evaluation Table

Contaminated Media	Potential <u>Human Receptors</u> (Under Current Conditions)						
	<u>Residents</u>	<u>Workers</u>	<u>Day-Care</u>	<u>Construction</u>	<u>Trespassers</u>	<u>Recreation</u>	<u>Food</u> <sup>3</sup>
Groundwater							
Air (indoors)							
Soil (surface, e.g., <2 ft.							
Surface Water							
Sediment							
Soil (subsurface e.g., >2 ft.							
Air (outdoors)							

Instructions for Summary Exposure Pathway Evaluation Table

1. Strike-out specific Media including Human Receptors' spaces for Media which are not “contaminated” as identified in #2 above.
2. enter “yes” or “no” for potential “completeness” under each “Contaminated” Media-- Human Receptor combination (Pathway).

Note: In order to focus the evaluation to the most probable combinations some potential “Contaminated” Media - Human Receptor combinations (Pathways) do not have check spaces (“\_\_\_”). While these combinations may not be probable in most situations they may be possible in some settings and should be added as necessary.

\_\_\_\_\_ If no (pathways are not complete for any contaminated mediareceptor combination) - skip to #6, and enter “YE” status code, after explaining and/or referencing condition(s) in-place, whether natural or man-made, preventing a complete exposure pathway from each contaminated medium (e.g., use optional Pathway Evaluation Work Sheet to analyze major pathways).

\_\_\_\_\_ If yes (pathways are complete for any “Contaminated” Media- Human Receptor combination) - continue after providing supporting explanation.

\_\_\_\_\_ If unknown (for any “Contaminated” Media- Human Receptor combination) - skip to #6 and enter “IN” status code.

**Rationale and Reference(s):**

<sup>3</sup> Indirect Pathway/Receptor (e.g., vegetables, fruits, crops, meat and dairy products, fish, shellfish, etc.

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4. Can the exposures from any of the complete pathways identified in #3 be reasonably expected to be "significant"<sup>4</sup> (i.e., potentially "unacceptable" because exposures can be reasonably expected to be: 1) greater in magnitude (intensity, frequency and/or duration) than assumed in the derivation of the acceptable "levels" (used to identify the "contamination"); or 2) the combination of exposure magnitude (perhaps even though low) and contaminant concentrations (which may be substantially above the acceptable "levels") could result in greater than acceptable risks)?

\_\_\_\_\_ If no (exposures can not be reasonably expected to be significant (i.e., potentially "unacceptable") for any complete exposure pathway)- skip to #6 and enter "YE" status code after explaining and/or referencing documentation justifying why the exposures (from each of the complete pathways) to "contamination" (identified in #3) are not expected to be "significant."

\_\_\_\_\_ If yes (exposures could be reasonably expected to be "significant" (i.e., potentially "unacceptable") for any complete exposure pathway) - continue after providing a description (of each potentially "unacceptable" exposure pathway) and explaining and/or referencing documentation justifying why the exposures (from each of the remaining complete pathways) to "contamination" (identified in #3) are not expected to be "significant."

\_\_\_\_\_ If unknown (for any complete pathway)- skip to #6 and enter "IN" status code

**Rationale and Reference(s):**

5. Can the "significant" exposures (identified in #4) be shown to be within acceptable limits?

\_\_\_\_\_ If yes (all "significant" exposures have been shown to be within acceptable limits)- continue and enter "YE" after summarizing and referencing documentation justifying why all "significant" exposures to "contamination" are within acceptable limits (e.g., a site-specific Human Health Risk Assessment).

\_\_\_\_\_ If no (there are current exposures that can be reasonably expected to be "unacceptable") - continue and enter "NO" status code after providing a description of each potentially "unacceptable" exposure.

\_\_\_\_\_ If unknown (for any potentially "unacceptable" exposure)- continue and enter "IN" status code

**Rationale and Reference(s):**

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<sup>4</sup> If there is any question on whether the identified exposures are "significant" (i.e., potentially "unacceptable") consult a human health Risk Assessment specialist with appropriate education, training and experience.

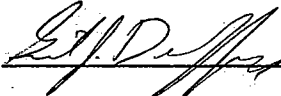
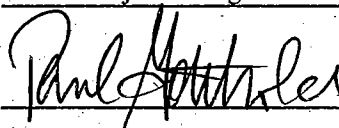
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6. Check the appropriate RCRIS status codes for the Current Human Exposures Under Control EI event code (CA725), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (and attach appropriate supporting documentation as well as a map of the facility):

  X   YE - Yes, "Current Human Exposures Under Control" has been verified. Based on a review of the Information contained in this EI Determination, "Current Human Exposures" are expected to be "Under Control" at the   Univar USA, Inc.   facility, EPA ID #   PAD014231005  , located at   North Railroad Ave., Hummelstown, PA 17036   under current and reasonably expected conditions. This determination will be re-evaluated when the Agency/State becomes aware of significant changes at the facility.

       NO - "Current Human Exposures" are NOT "Under Control."

       IN - More information is needed to make a determination.

Completed by	(signature)	<u></u>	Date	<u>  2/1/13  </u>
	(print)	<u>  Grant Dufficy  </u>		<u>  2/1/2013  </u>
	(title)	<u>  RCRA Project Manager  </u>		
Supervisor	(signature)	<u></u>	Date	<u>  2/13/13  </u>
	(print)	<u>  Paul Gotthold  </u>		
	(title)	<u>  Assoc. Dir., PA Remediation, LCD  </u>		
	(EPA Region or State)	<u>  EPA Region III  </u>		

Locations where References may be found:

USEPA Region III  
Waste and Chemical Mgmt. Division  
1650 Arch Street  
Philadelphia, PA 19103

PADEP  
South Central Regional Office  
909 Elmerton Avenue  
Harrisburg, PA 17110

Contact telephone and e-mail numbers

(name)	<u>  Grant Dufficy  </u>
(phone #)	<u>  215-814-3455  </u>
(e-mail)	<u>  Dufficy.grant@epa.gov  </u>

**FINAL NOTE: THE HUMAN EXPOSURES EI IS A QUALITATIVE SCREENING OF EXPOSURES AND THE DETERMINATIONS WITHIN THIS DOCUMENT SHOULD NOT BE USED AS THE SOLE BASIS FOR RESTRICTING THE SCOPE OF MORE DETAILED (E.G., SITE-SPECIFIC) ASSESSMENTS OF RISK.**