

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: Sunoco, Inc. (R&M) Schuylkill River Tank Farm
Facility Address: 70th St. and Essington Ave., Philadelphia, PA 19153
Facility EPA ID #: PAD980555312

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”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 (from SWMUs, RUs or AOCs)?

	<u>Yes</u>	<u>No</u>	<u>?</u>	<u>Rationale / Key Contaminants</u>
Groundwater	X			Subsurface LNAPL is present at site.
Air (indoors) ²		X		OSHA workplace standards are applicable, protective, and are not exceeded.
Surface Soil (e.g., <2 ft)		X		See discussion below
Surface Water		X		See discussion below
Sediment		X		See discussion below
Subsurf. Soil (e.g., >2 ft)	X			See discussion below
Air (outdoors)		X		OSHA workplace standards are applicable, protective, and are not exceeded.

—— 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.

X 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):

GROUNDWATER: The primary contaminant of concern at the tank farm is light non-aqueous phase liquid (LNAPL) which exists beneath a portion of the tank farm blending area. The primary impact of the LNAPL would be dissolved concentrations of benzene, toluene, ethylbenzene, and xylene (BTEX) and MTBE in groundwater. A round of groundwater sampling was completed at the tank farm on May 1, 2003. Benzene was detected in groundwater at a maximum concentration of 0.220 mg/l. MTBE was detected in groundwater at a maximum concentration of 3.0 mg/l. All other volatile and semi-volatile organic compounds and dissolved lead were not detected above the detection limits. Groundwater is not used for drinking or other uses (besides monitoring) at the facility. See Administrative Record for Groundwater Analytical Results, May 1, 2003.

AIR (indoors): OSHA workplace standards are applicable, protective and are not exceeded. Please see Administrative Record for reference - Indoor monitoring results from a round of sampling in the control room on November 5, 2001 (Sunoco Tom Surynt Memo of January 22, 2002, Subject: Industrial Hygiene Monitoring).

SURFACE SOIL (<2 ft): There is no visible evidence of surface soil contamination at the site. According to a 1981 Notification of Hazardous Waste Site from EPA to Gulf, leaded tank bottoms were disposed of at the site. Although Sunoco does not know exactly where the leaded sludge have been disposed, Sunoco expects the sludge would be buried at a depth greater than 2 feet.

SURFACE WATER: Groundwater flow direction is away from the Schuylkill River, toward the interior of the tank farm. See Administrative Record for historic groundwater contour map of the facility.

SUBSURFACE SOIL (>2FT): According to a 1981 Notification of Hazardous Waste Site from EPA to Gulf, leaded tank bottoms were disposed of at the site. Although Sunoco does not know exactly where the leaded sludge

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may have been disposed, it is expected that the sludge would be buried at a depth greater than two feet. The groundwater analytical results indicate that there is no significant source of contaminants in the soil. During the excavation of the trench for the installation of the new fire line on Main Street, Handex Environmental, on behalf of Sunoco, secured soil samples from the base of the trench. The samples were analyzed for parameters specified by PA Act 2 for leaded and unleaded gasoline, No. 2, 4, 5 and 6 fuel oils. None of the parameters analyzed exceeded the medium specific concentration (MSC's), soil to groundwater pathway for a non-use aquifer under Pennsylvania's Act 2. See Administrative Record for reference - Handex Report of February 8, 2002, Re: Trench Investigation: Schuylkill River Tank Farm Philadelphia Refinery.

SEDIMENT: Groundwater at the site flows away from the river. Based on the flow pattern and due to the urban nature of the area and the historic and ongoing dredging operations in the river, no accumulation of sediments is expected to occur and no contaminants above background for the lower Schuylkill are expected to be present.

Footnotes:

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

² 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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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

Potential **Human Receptors** (Under Current Conditions)

<u>“Contaminated” Media</u>	Residents	Workers	Day-Care	Construction	Trespassers	Recreation	Food ³
Groundwater	NO	NO	NO	YES	NO	NO	NO
Air (indoors)	---	---	---				
Soil (surface, e.g., <2 ft)	NO	NO	NO	YES	NO	NO	NO
Surface Water	NO	NO	NO	NO	NO	NO	NO
Sediment	---	---			---	---	---
Soil (subsurface e.g., >2 ft)	NO	NO	NO	YES	NO	NO	NO
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.

* A subsurface soil pathway has been added for workers. The “construction” receptor is more realistically a “worker” receptor at this facility (see “worker” receptor discussion below). Groundwater and subsurface exposure pathways will be discussed via the worker receptor category.

_____ If no (pathways are not complete for any contaminated media-receptor 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).

X 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):

RESIDENTS: No complete pathways for the groundwater or surface water media. There are no residents who are users of groundwater or surface water at or adjacent to the facility.

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WORKERS: The receptors for surface soil are a limited number of facility workers, however there is no visible evidence of surface impact. Facility workers would not contact subsurface soil. There is no complete pathway for groundwater. There are no on-site wells for production or water supply (or other opportunities for production worker contact with contaminated groundwater).

DAY-CARE: No day-care facilities (or other non-production and possibly sensitive receptor uses such as schools or hospitals exist at or near the facility or use of groundwater.

CONSTRUCTION: Pathway is complete for groundwater, surface soil and subsurface soil, however, exposure is limited through OSHA regulations, appropriate Health & Safety plans and the use of proper PPE.

TRESPASSERS: The facility perimeter is fenced and/or bordered by a river. The perimeter is regularly patrolled.

RECREATION: There is no recreational swimming adjacent to facility property. There are no other recreational activities within the facility perimeter.

FOOD: No complete pathways for groundwater or subsurface soil contaminated media; no food items (plant or animal) are grown/produced in contact with contaminated groundwater, surface or subsurface soil.

3 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”**⁴ (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)?

 X 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):

WORKERS/CONSTRUCTION WORKERS: The contaminants involved with potential exposures are all constituents associated with the primary facility activity of petroleum blending and storage. OSHA workplace standards and exposure controls are in place/applicable in all areas of the facility. Since OSHA workplace standards and controls that apply to ensure acceptable exposure levels are not exceeded for hydrocarbons, petroleum blending and storage, and their associated hazards, these standards effectively control exposure to media contaminated by these materials and activities. Examples of types of exposure controls include training, personal protective equipment such as protective clothing and work area monitoring to ensure safe breathing levels in ambient air. Another example of exposure control is preparation and compliance with site health and safety plans prepared in conjunction with remediation activities. Since OSHA workplace standards and exposure controls are in place and applicable for all facility locations, and these controls are specific to the “contaminants” in the contaminated media, the worker exposures are effectively controlled and are within acceptable limits.

⁴ 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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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):

