SIXTH FIVE-YEAR REVIEW REPORT FOR BRUIN LAGOON SUPERFUND SITE BUTLER COUNTY, PENNSYLVANIA



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Prepared by

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Table of Contents

LIST OF ABBREVIATIONS AND ACRONYMS	2
I. INTRODUCTION	
Site Background	3
FIVE-YEAR REVIEW SUMMARY FORM	5
II. RESPONSE ACTION SUMMARY	5
Basis for Taking Action	5
Response Actions	
Status of Implementation	
Systems Operations/Operation and Maintenance (O&M)	g
III. PROGRESS SINCE THE PREVIOUS REVIEW	
IV. FIVE-YEAR REVIEW PROCESS	10
Community Notification, Community Involvement and Site Interviews	10
Data Review	10
Site Inspection Error! Bookm	
V. TECHNICAL ASSESSMENT	13
QUESTION A: Is the remedy functioning as intended by the decision documents?	13
QUESTION B: Are the exposure assumptions, toxicity data, cleanup levels and RAOs used a	t the time of the
remedy selection still valid?	
QUESTION C: Has any other information come to light that could call into question the prote	ectiveness of the
remedy?	
VI. ISSUES/RECOMMENDATIONS	
OTHER FINDINGS	
VII. PROTECTIVENESS STATEMENT	
VIII. NEXT REVIEW	
APPENDIX A – REFERENCE LIST	
APPENDIX B – SITE CHRONOLOGY	
APPENDIX C – PRESS NOTICE	
APPENDIX D – INTERVIEW FORMS	
APPENDIX E – SITE INSPECTION CHECKLIST	
APPENDIX F – SITE INSPECTION PHOTOS	
APPENDIX G –DETAILED DATA REVIEW	G-1
APPENDIX H – WELL PAIR CHARTS	H-1

LIST OF ABBREVIATIONS AND ACRONYMS

AO Administrative Order

ARAR Applicable or Relevant and Appropriate Requirement

CCC Criterion Continuous Concentration

CFR Code of Federal Regulations

CH₄ Methane

CMC Criterion Maximum Concentration

COC Contaminant of Concern

EPA United States Environmental Protection Agency

ESD Explanation of Significant Differences

FS Feasibility Study
FYR Five-Year Review
HHC Human Health Criterion
IC Institutional Control
LEL Lower Explosive Limit

MSC Medium Specific Concentration

 $\begin{array}{ll} \mu g/L & \text{Micrograms Per Liter} \\ mg/L & \text{Milligrams Per Liter} \end{array}$

ND Not Detected

NPL National Priorities List O&M Operation and Maintenance

OU Operable Unit

PADEP Pennsylvania Department of Environmental Protection

PCMP Post-Closure Monitoring Plan

POC Point of Compliance ppm Parts Per Million

PRP Potentially Responsible Party RAO Remedial Action Objective

RCRA Resource Conservation and Recovery Act

RI Remedial Investigation ROD Record of Decision

RPM Remedial Project Manager

SMCL Secondary Maximum Contaminant Level
SVOC Semi-Volatile Organic Compound
VOC Volatile Organic Compound

USACE United States Army Corps of Engineers
UU/UE Unlimited Use and Unrestricted Exposure

I. INTRODUCTION

The purpose of a five-year review (FYR) is to evaluate the implementation and performance of a remedy to determine if the remedy is and will continue to be protective of human health and the environment. The methods, findings and conclusions of reviews are documented in FYR Reports such as this one. In addition, FYR Reports identify issues found during the review, if any, and document recommendations to address them.

The U.S. Environmental Protection Agency (EPA) is preparing this FYR pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act Section 121, consistent with the National Contingency Plan (40 Code of Federal Regulations (CFR) Section 300.430(f)(4)(ii)), and considering EPA policy.

This is the sixth FYR for the Bruin Lagoon Superfund site (the Site). The triggering action for this statutory review is the completion date of the previous FYR. The FYR has been prepared because hazardous substances, pollutants or contaminants remain at the Site above levels that allow for unlimited use and unrestricted exposure (UU/UE).

The Site consists of two operable units (OUs), both of which are addressed in this FYR. OU1 and OU2 both address the source waste materials at the Site. The OUs represent the same waste stream and reflect two separate remediation efforts.

The EPA remedial project manager (RPM) led the FYR. Participants included EPA's technical support personnel, representatives from Pennsylvania Department of Environmental Protection (PADEP) and representatives from EPA FYR support contractor Skeo. The review began on October 22, 2018.

Site Background

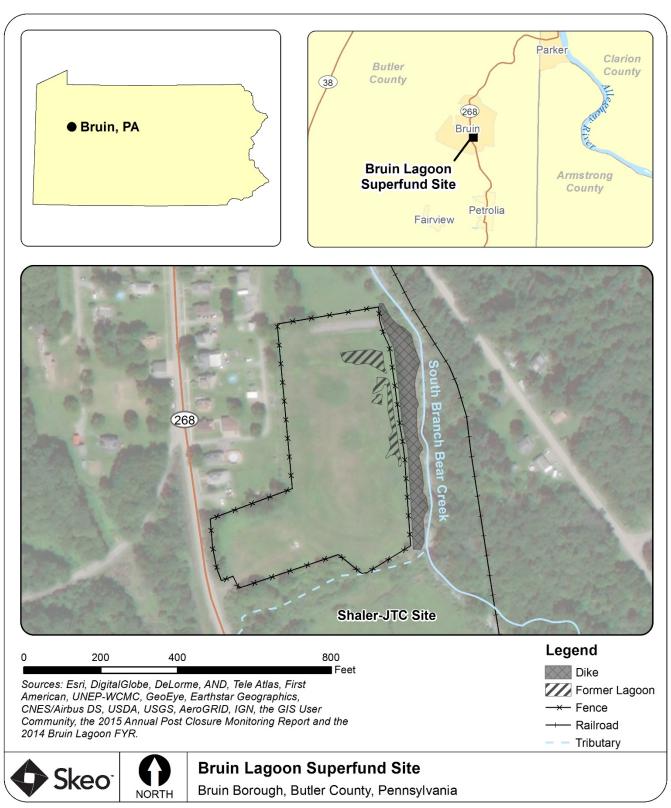
The 4-acre Site is located about 45 miles north of Pittsburgh, on Route 268 just south of Bruin-Fairview Road in Bruin Borough, Butler County, Pennsylvania (Figure 1). The Site is managed by PADEP under the terms of a December 14, 1988 State Superfund Contract (SSC).

The Site was formerly an earthen-diked lagoon that received acidic sludge wastes from the adjacent Bruin Oil Company. Sludge wastes consisted of white oil production wastes, residue from motor oil, coal fines and fly ash. The lagoon contained about 130,000 gallons of acidic liquid and 35,000 cubic yards of sludge.

The fenced and gated Site currently consists of the capped waste lagoon, groundwater monitoring wells and passive gas vents. The South Branch of Bear Creek (referred to as Bear Creek in this report) borders the Site to the east and northeast. Bear Creek eventually flows into the Allegheny River, located 7 miles from the Site. A small tributary to Bear Creek borders the Site to the south. Homes border the Site to the north and west. Directly south of the Site is the Shaler-JTC site, which was previously owned by Bruin Oil Company and was the source of sludge deposited on the Site; it has undergone a cleanup by PADEP, is currently vacant and is in the operation and maintenance (O&M) phase.

Groundwater at the Site occurs in a bedrock groundwater system located in fractured sandstone, which consists of shallow, intermediate and deep zones. A perched liquid zone is located above the bedrock system within the soil fill and sludge in the lagoon. In the immediate vicinity of the Site, the bedrock water table aquifer flows in a general northeasterly direction and discharges into the South Branch of Bear Creek. Due to past mining exploration activities in the area of the Site and neighboring contaminated properties, the groundwater underlying the Site has localized contamination with inorganic compounds. An abandoned underground coal mine is located about a half-mile northeast of the Site. Bear Creek is contaminated upstream of the Site; its water quality is highly variable on a day-to-day basis. All potable wells in Bruin Borough have been disconnected and residences are connected to a municipal supply system. Appendix A provides a list of the resources used in the preparation of this FYR. Appendix B provides the Site's chronology of events.

Figure 1: Site Vicinity Map



Disclaimer: This map and any boundary lines within the map are approximate and subject to change. The map is not a survey. The map is for informational purposes only regarding EPA's response actions at the Site.

FIVE-YEAR REVIEW SUMMARY FORM

SITE IDENTIFICATION				
Site Name: Bruin Lagoo	n			
EPA ID: PAD98071285	5			
Region: 3	State: Pennsylvania	City/County: Bruin Borough / Butler County		
	SITE	STATUS		
NPL Status: Final				
Multiple OUs? Yes	Has the Si Yes	te achieved construction completion?		
	REVIEW STATUS			
Lead agency: EPA				
Author name: Jim Feen	Author name: Jim Feeney, with additional support provided by Skeo			
Author affiliation: EPA Region 3				
Review period: 10/22/20	018 – 9/17/2019			
Date of site inspection: 10/24/2018				
Type of review: Policy				
Review number: 6				
Triggering action date: 9/17/2014				
Due date (five years after triggering action date): 9/17/2019				

II. RESPONSE ACTION SUMMARY

Basis for Taking Action

Between 1930 and 1970, a 1-acre lagoon was used for the disposal of wastes. In 1968, the lagoon dike breached and about 3,000 gallons of acidic waste sludge were released into Bear Creek. At the time of the breach, the American International Petroleum Company owned Bruin Lagoon. An estimated 4 million fish were killed in the Allegheny River as a result of the discharge and evidence of the spill was observed over 100 miles downstream from the Site. Downstream communities that used Bear Creek and the Allegheny River for potable water had to temporarily shut down their water supply systems and find alternate water supplies. The American International Petroleum Company reinforced the dike and sold the property to the AH&RS Coal Company a few years later.

The Site's 1986 remedial investigation (RI) found contaminants in the lagoon at the Site that were a threat to human health and the environment. The acidic sludge, which contained organic contaminants, including acetone, benzene, toluene and xylenes, and metals posed a threat to humans and wildlife that could have dermal (direct) contact with it or could ingest it. In addition, the acidic sludge posed a serious threat to surface water due to proximity to the nearby river. The untreated acidic sludge also posed a serious threat of release as toxic gas. If the Site was disturbed by drilling or other invasive activities, there was the potential for a toxic gas release, which

would have been an air exposure risk to the community. The intermittent ponded water that collected at the Site also posed a potential threat to humans and wildlife because it was acidic.

Response Actions

In April 1979, PADEP notified EPA of potentially unstable dikes around the lagoon that could cause further releases of acidic sludge into Bear Creek. In May 1981, EPA and PADEP conducted a site inspection. In September 1981, EPA reinforced the lagoon dike and constructed a security fence around the property. EPA contractors began a combined remedial investigation/feasibility study (RI/FS) in July 1981 which was completed in February 1982.

In June 1982, EPA issued a Record of Decision (ROD) for OU1 at the Site, which required the removal and off-site disposal of scrap tanks and approximately 130,000 gallons of acidic liquid waste. In September 1983, EPA listed the Site on the National Priorities List (NPL). In 1984, during remedial activities, toxic gases were released during an accidental breach of a previously unidentified sludge layer in the lagoon. EPA ceased remedial activities and initiated an emergency response action that successfully mitigated the release. In September 1984, EPA initiated a new RI for the Site. The resulting 1986 RI concluded that the groundwater and bedrock under the Site were contaminated by releases of hazardous substances from the lagoon, and area groundwater had been contaminated by elevated metals due to past mining and oil/gas exploration activities. It also determined that residential wells were hydraulically upgradient of the Site and therefore not likely affected by the Site.

A 1986 Public Health Evaluation identified contaminants of concern (COCs) in soil, groundwater and surface water for human health and aquatic receptors. The COCs identified were cadmium, chromium, copper, lead, zinc and sulfate for human health; and aluminum, cadmium, chromium and copper for aquatic life. Acidity (low pH) was also identified as a COC due to the presence of highly acidic sludge in the lagoon, which posed a threat to human health and the environment. Volatile organic compounds (VOCs), including acetone, benzene, toluene and xylenes, were detected in the sludge but were generally not present in groundwater samples collected during the 1986 RI.

In September 1986, EPA issued a ROD for OU2 at the Site, which superseded the OU1 remedy. The remedial action objectives (RAOs) included:

- Containing, reducing and/or eliminating site contaminants identified as representing possible sources of exposure to human and other receptors.
- Reducing or eliminating exposure of site contaminants to potential receptors by controlling potential contaminant pathways.
- Ensuring technical feasibility, protecting public health and the environment and the cost-effectiveness of the remedial action.

The remedy selected for OU2 included:

- On-site stabilization/neutralization of sludge and perched liquid zone.
- In-situ treatment of bedrock underneath the former lagoon area.
- Completion of dike reinforcement.
- Capping of the former lagoon area with a Resource Conservation and Recovery Act (RCRA) multi-layer cap.
- Monitoring and maintenance of the site cap and groundwater.

The OU2 ROD acknowledged that regional groundwater quality was impacted and therefore did not propose treating the limited groundwater contamination underneath the lagoon. The performance of the implemented remedy was to be measured by RCRA landfill closure standards. These standards dictate that groundwater quality outside and downgradient of the capped area at points of compliance (POCs) were required to meet concentration

limits specified in 40 CFR § 264.94, or should be equivalent to the upgradient background groundwater quality, whichever is less stringent. COCs were not established for the Site in the OU2 ROD.

The OU2 selected remedy did not include a requirement for institutional controls. However, in September 2000, the Commonwealth of Pennsylvania issued an Administrative Order (AO) pursuant to Section 512 of the Hazardous Sites Cleanup Act to the Site's potentially responsible parties (PRPs), including AH-RS Coal Corporation, J.T.C. Industries, Inc., and Shaler Contracting and Development Corporation, prohibiting certain activities at the Site. In 2015, EPA issued an Explanation of Significant Differences (ESD) to include certain institutional controls from the 2000 AO as part of the selected remedy for the Site.

Status of Implementation

Under an Interagency Agreement, the U.S. Army Corps of Engineers (USACE) initiated the remedial design in January 1988 and completed it in July 1988. Remedial action for the OU2 ROD began in March 1989 and construction was completed in June 1991. Activities included:

- Excavating the waste in the lagoon down to bedrock and performing on-site neutralization and stabilization.
- Placing layers of lime over the bedrock surface to promote neutralization of acid in the bedrock.
- Returning the stabilized waste to the excavated lagoon.
- Constructing a final RCRA multi-layer cap on the stabilized waste.
- Installing gas vents.
- Constructing a surface water drainage system around the stabilized lagoon to prevent surface water from entering the capped area.

The RAOs were achieved at the Site and EPA issued a Close-Out Report in March 1992. EPA deleted the Site from the NPL in 1997.

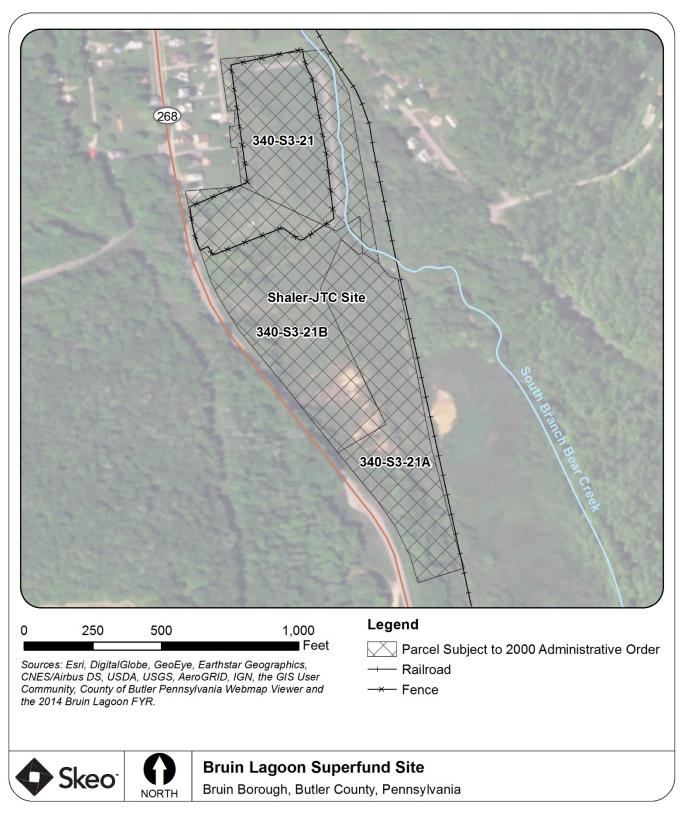
Institutional Control (IC) Review

On September 18, 2000, the commonwealth of Pennsylvania issued an AO pursuant to Section 512 of HSCA to the Site's PRPs, prohibiting some activities at the Site. The AO was filed with the Recorder of Deeds for Butler County in October 2000. The Site's 2015 ESD modified the site remedy to include the institutional controls that are in the 2000 AO in order to protect human health and the environment, maintain the integrity of the remedy, and prohibit activities that could interfere with the remedy. The specific restrictions in the 2000 AO include:

- Cease any activity that would disturb or be inconsistent with the remedial actions implemented at the Site at the time the AO was issued.
- Ensure that groundwater monitoring wells are not disturbed.
- Prohibit installation of additional groundwater wells without prior written approval of PADEP.
- Prevent any disturbance of the landfill cap that would cause underlying waste to be exposed or that could contribute to cap erosion.
- Require that the property deed for any future conveyance or transfers of parcels at the Site include a description of the remedial response actions taken on any parcel of property comprising the Site and an acknowledgement that hazardous substances have been disposed of there. The acknowledgement shall include, but not be limited to, the surface area, size and exact location of the disposed substances as well as a description of the types of hazardous substances contained there.

The institutional controls apply to three parcels, which include the Site and the Shaler-JTC site (Figure 2). The PRPs remain the owners of their respective parcels.

Figure 2: Institutional Control Map



Disclaimer: This map and any boundary lines within the map are approximate and subject to change. The map is not a survey. The map is for informational purposes only regarding EPA's response actions at the Site.

Table 1: Summary of Planned and/or Implemented Institutional Controls (ICs)

Media, Engineered Controls, and Areas That Do Not Support UU/UE Based on Current Conditions	ICs Needed	ICs Called for in the Decision Documents	Impacted Parcel(s)	IC Objective	Title of IC Instrument Implemented and Date (or planned)
Soil and Groundwater	Yes	Yes	340-S3-21, 340-S3-21B, 340-S3-21A	Prohibit the disturbance of the cap to maintain the integrity of the remedy, prohibit activities that could interfere with the selected remedy and prohibit installing wells	Administrative Order, September 2000

Systems Operations/Operation and Maintenance (O&M)

Pursuant to the SSC, PADEP performs annual O&M activities in accordance with the terms of an EPA-approved 1992 O&M Plan and Post-Closure Monitoring Plan (PCMP) Amendments from 2010 and 2017. These activities include inspecting and maintaining the lagoon cap, mowing overgrown vegetation; inspecting surface water drainage systems and areas of discharge of surface water into the South Branch of Bear Creek; and performing annual groundwater, surface water and gas vent monitoring. The current SSC terminates on October 30, 2020. The SSC period of performance should be extended to ensure that O&M is performed at the Site.

III. PROGRESS SINCE THE PREVIOUS REVIEW

This section includes the protectiveness determination and statement from the previous FYR Report as well as the recommendation from the previous FYR Report and the status of the recommendation.

Table 2: Protectiveness Determination/Statement from the 2014 FYR Report

OU#	Protectiveness Determination	Protectiveness Statement
Sitewide	Short-term Protective	The selected remedy is protective of human health and the environment because the cap is intact and functioning as designed; therefore, no human or environmental receptors are currently exposed to the stabilized waste material. The formation of toxic gases was eliminated. In addition, the historic groundwater monitoring data indicate that a source stabilization and bedrock neutralization remedy is functioning as designed by significantly reducing the migration of contaminants to groundwater underneath the Site and preventing migration of contamination outside the site boundary. Institutional controls to protect the remedy were implemented through a 512 Order.

Table 3: Status of Recommendations from the 2014 FYR Report

OU #	Issue	Recommendation	Current Status	Current Implementation Status Description	Completion Date (if applicable)
2	None of RODs include documentation of already implemented institutional controls.	Issue an ESD documenting implementation of institutional controls as a remedy component.	Completed	EPA issued an ESD to require institutional controls on the Site and state that the 2000 AO is the appropriate institutional control for the Site.	9/28/2015

IV. FIVE-YEAR REVIEW PROCESS

Community Notification, Community Involvement and Site Interviews

EPA placed an advertisement in the *Butler Eagle*, a local newspaper, on June 3, 2019 (Appendix C). The ad informed the community of the purpose of the FYR and the upcoming availability of the Report. EPA received no questions, comments or response from this advertisement. This FYR report will be made available online at https://www.epa.gov/superfund/bruinlagoon

Interviews

On June 14, 2019, EPA's Community Involvement Coordinator for the Site conducted a phone interview with the Director of Emergency Services for Butler County. The Director was familiar with the Site and expressed satisfaction with the effectiveness of the remedy. He stated there have not been any issues at the Site that have required emergency response or visits. He feels the community has knowledge of the Site but is not concerned about its status and it has had little impact on the community. He did not have any suggestions or recommendations for EPA moving forward.

On October 24, 2018, the RPM discussed the ongoing work and the FYR at the Site with representatives of PADEP. They reported that current interest in the Site is minimal with only few inquiries, and that no negative comments have been received from the general public in the last five years.

Data Review

PADEP conducted groundwater, surface water and gas vent sampling annually during this FYR period (2014 through 2018) in accordance with the 2010 and 2017 PCMPs. Groundwater and surface water samples were analyzed for VOCs, semi-volatile organic compounds (SVOCs), metals and general indicators of groundwater quality. Gas vent data are analyzed for gaseous emissions including the lower explosive limit, oxygen, hydrogen sulfide, methane, sulfur dioxide, VOCs, carbon dioxide and hydrochloric acid. A detailed analysis of data collected during this FYR period and reported in the annual reports is provided in Appendix G. A summary of the findings as they pertain to analyzing the protectiveness of the site remedy is included in this section.

Groundwater Monitoring

PADEP contractors monitor 14 wells at the Site, screened in the shallow, intermediate and deep bedrock (Figure 3). Wells are located upgradient of the Site, within the waste material at the Site (MW-05A and MW-06A) and downgradient of the Site. There are four POC wells, which are located downgradient of the Site (Table G-1 in Appendix G). Except for chromium in the downgradient deep bedrock, all COC concentrations in POC wells are less than the RCRA concentration limits (Table G-2 in Appendix G). Chromium was detected in deep POC well MW-16D at 72 micrograms per liter (μ g/L) in 2018, which was an increase of an order of magnitude compared to previous years and exceeds the RCRA concentration limit of 50 μ g/L. Upgradient deep bedrock well MW-14D experienced a similar increase with a 2018 chromium concentration of 47 μ g/L, indicating the chromium at POC well MW-16D is likely coming from upgradient sources.

This FYR created trend charts for two sets of paired upgradient/POC wells. These pairs were selected based on historical groundwater flow directions and analyzed in accordance with the previous FYR. The results are summarized in Appendix G and the charts are provided in Appendix H. At both POC locations, metals concentrations were similar to or less than the corresponding upgradient well.

1,4-Dioxane continues to be detected in one well on site, MW-06A. This well is screened in the waste material. Concentrations have generally remained stable (Table G-3) and 1,4-dioxane will continue to be monitored at site wells.

See Appendix G and Table G-4 for discussion of additional groundwater contaminants at the Site and how they compare to PADEP criteria. Generally, the observed concentrations are consistent with historical groundwater concentrations. Concentrations are below PADEP criteria except for aluminum, iron and sulfate.

Surface Water Monitoring

The surface water monitoring network consists of three surface water sample locations located adjacent to the Site (SW-03, SW-04 and SW-05) and two samples from the Shaler-JTC site (SW-01 and SW-02) upstream of the Site (Figure 3). Concentrations of metals, VOCs and SVOCs were all within historic concentrations. Except for pH and 2-methylphenol, there were no exceedances of the PADEP criteria in any surface water sampling location (Table G-5). The pH levels are intermittently below the PADEP standard of 6 standard units. In 2014, SW-01 and SW-02 (both upgradient of the Site) were below 6 at 5.47 and 3.35 standard units, respectively. In 2017, SW-01 and SW-03 were both slightly below 6 (5.92 and 5.80 standard units, respectively). In 2015, SVOC 2-methyphenol slightly exceeded the recommended screening level of 13 µg/L at SW-1 (19 µg/L) and SW-2 (18 µg/L); both of these locations are upstream of the Site in an area that is side-gradient with respect to groundwater flow. The screening level recommended by the National Oceanic and Atmospheric Administration (NOAA) was used as the standard because there is no applicable state PADEP criteria. There is no indication that the Site is negatively impacting surface water quality, and the upgradient water quality issues are attributed to the region's history of mining activities.

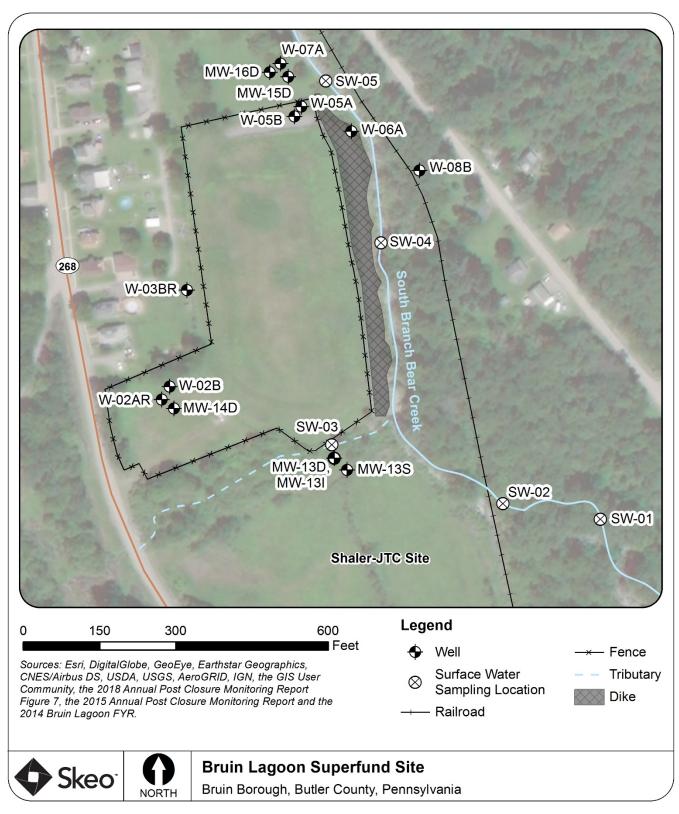
Gas Vent Monitoring

The 15 gas vents in the cap (V-1 through V-15) are screened annually for gaseous emissions. Five background locations are also are also screened (BG-1 through BG-5). Parameters include the lower explosive limit, oxygen, hydrogen sulfide, methane, sulfur dioxide, VOCs, carbon dioxide and hydrochloric acid. Low level VOCs and methane were detected in gas vents located on site during this FYR period (Table G-6 in Appendix G). Results indicate emissions are not a concern at the Site.

Site Inspection

The site inspection took place on October 24, 2018. Participants included EPA RPM Jim Feeney, Mariruth Hoffman and Chuck Tordella from PADEP, and Alison Cattani from EPA FYR support contractor Skeo. The purpose of the inspection was to assess the protectiveness of the remedy. Site inspection participants observed the cap, which was in excellent condition, well vegetated and had been recently mowed. The passive gas vents and the monitoring wells were also in good condition. During the site inspection, participants also observed the fence, which had no breaches or damage. There were no signs of trespassing or dumping, but PADEP representatives indicated that some dumping has occurred during this FYR period. The PADEP O&M contractor installed a No Dumping sign on the fence bordering the residences. The dike along Bear Creek was in good condition. The site inspection checklist and photographs are provided in Appendices E and F, respectively.

Figure 3: Detailed Site Map



Disclaimer: This map and any boundary lines within the map are approximate and subject to change. The map is not a survey. The map is for informational purposes only regarding EPA's response actions at the Site.

V. TECHNICAL ASSESSMENT

QUESTION A: Is the remedy functioning as intended by the decision documents?

Yes, the remedy is functioning as intended by the decision documents. The remedial action included on-site stabilization and neutralization of sludge, a multi-layer cap over the stabilized sludge, and site maintenance and monitoring. The implemented remedy has achieved all RAOs, continues to control off-site contaminant migration, and prevents contact with and ingestion of waste materials. The cap is well-maintained and vegetated with no indication of any issues that would compromise its integrity.

Groundwater and surface water monitoring results indicate that the remedy is preventing contaminants from leaching out of the waste material and into groundwater and surface water. While some constituents such as aluminum and iron remain elevated in groundwater at the Site, these results are consistent with historic results as well as current upgradient water quality due to the region's historically poor water quality, a result of past mining activities in the region. The increase in chromium concentrations detected in 2018 in POC well MW-16D and upgradient well MW-14D can be attributed to upgradient sources. Periodic monitoring of gas vents over the cap indicates no appreciable concentrations of landfill gases present underneath the cap.

Institutional controls are in place and effective and have been recorded in the 2000 AO. Nearby residences as well as all homes in Bruin Borough have been connected to public water supply.

QUESTION B: Are the exposure assumptions, toxicity data, cleanup levels and RAOs used at the time of the remedy selection still valid?

Yes, the exposure assumptions, cleanup levels and RAOs remain valid. The OU2 ROD identified the requirements for the RCRA-compliant closure of landfills as applicable or relevant and appropriate requirements (ARARs) for the Site. The OU2 ROD acknowledged that regional groundwater quality was poor and did not propose treating limited groundwater contamination under the lagoon. Performance of the implemented remedy was measured by RCRA landfill closure standards, which dictate that groundwater quality outside and downgradient of the capped area meet values given in 40 CFR §264.94, or upgradient background groundwater quality. These RCRA groundwater concentration limits for select compounds (including arsenic, barium, cadmium, chromium, lead, mercury, selenium and silver) remain unchanged since the issuance of the ROD.

The RAOs in the OU2 ROD are still valid and have been met. Site contaminants are contained on site and do not pose an exposure risk to potential receptors. Regional groundwater quality remains poor and groundwater contamination under the Site remains localized within site boundaries and exhibits decreasing or steady trends. 1,4-Dioxane is now monitored at the Site but was not routinely monitored when the remedy was selected in 1986.

1,4-Dioxane has been detected consistently at on-site well W-06A, which is located on the east end of the cap near Bear Creek. At the time of the OU2 ROD issuance, this constituent was not part of routine analysis. During this FYR period, 1,4-dioxane has not been detected at any other wells besides W-06A, which indicates it is not present upgradient or downgradient of the Site. In addition, 1,4-dioxane was not detected in surface water samples collected from Bear Creek. 1,4-dioxane should continue to be monitored at the Site.

Based on the lack of VOC and SVOC detections upgradient and downgradient of the Site and the fact that residences are upgradient of the waste material, vapor intrusion is not a concern at the Site.

QUESTION C: Has any other information come to light that could call into question the protectiveness of the remedy?

Yes. The current SSC expires on October 30, 2020. The SSC period of performance should be extended to ensure that O&M continues to be performed at the Site.

VI. ISSUES/RECOMMENDATIONS

Issues/Recommendations	
OUs without Issues/Recommendations Identified in the FYR:	
None	

Issues and Recommendations Identified in the FYR:				
OU: OU1 and	Issue Category: Operations and Maintenance			
OU2	Issue: The current S	Issue: The current SSC expires on October 30, 2020.		
	Recommendation: Extend the period of performance of the SSC to ensure that O&M is performed at the Site.			
Affect Current Protectiveness	Affect Future Protectiveness	Party Responsible	Oversight Party	Milestone Date
No	Yes	EPA/State	EPA	10/30/2020

OTHER FINDINGS

Three other findings were identified during the FYR. These other findings do not affect current and/or future protectiveness.

- A local information repository is being reestablished near the Site, at the Foxburg Free Library in Foxburg, PA 16036.
- Monitoring for 1,4-dioxane should be continued at the Site.

VII. PROTECTIVENESS STATEMENT

	Protectiveness Statements
<i>Operable Unit:</i> 1,2	Protectiveness Determination: Short-term Protective
D (C)	

Protectiveness Statement:

The site remedy is protective of human health and the environment in the short term because the cap is in place and functioning as intended, the formation of toxic gases has been eliminated, groundwater and surface water monitoring indicate site-related contaminants are not migrating off site, and an institutional control is in place to protect the remedy. For the remedy to be protective in the long term, the period of performance of the SSC needs to be extended to ensure that O&M continues to be performed at the Site.

Sitewide Protectiveness Statement

Protectiveness Determination:

Short-term Protective

Protectiveness Statement:

The site remedy is protective of human health and the environment in the short term because the cap is in place and functioning as intended, the formation of toxic gases has been eliminated, groundwater and surface water monitoring indicate site-related contaminants are not migrating off site, and an institutional control is in place to protect the remedy. For the remedy to be protective in the long term, the period of performance of the SSC needs to be extended to ensure that O&M continues to be performed at the Site.

VIII. GOVERNMENT PERFORMANCE AND RESULTS ACT MEASURES

As part of this FYR, the Government Performance and Results Act (GPRA) Measures have been reviewed. The GPRA Measures and their status are as follows:

Environmental Indicators

Human Health: Long-Term Human Health Protection Achieved (HEUC-HHPA) Groundwater Migration: Contaminated Groundwater Migration Under Control (GMUC)

Sitewide Ready for Anticipated Use (SWRAU)

The Site has achieved SWRAU (10/5/2000)

IX. NEXT REVIEW

The next FYR Report for the Site is required five years from the completion date of this review.

APPENDIX A – REFERENCE LIST

2017 Annual Post Closure Monitoring Report, Bruin Lagoon NPL Site, Borough of Bruin, Butler County, Pennsylvania. Prepared by AECOM E&C for Pennsylvania Department of Environmental Protection. August 2018.

2018 Annual Post Closure Monitoring Report, Bruin Lagoon NPL Site, Borough of Bruin, Butler County, Pennsylvania. Prepared by AECOM E&C for Pennsylvania Department of Environmental Protection. February 2019.

Addendum to the Five-Year Reviews, Dated July 2004 and August 2009, Bruin Lagoon Superfund Site. EPA Region 3. August 2010.

Administrative Order. The Commonwealth of Pennsylvania, Department of Environmental Protection. September 2000.

Annual Post Closure Monitoring Report 2014, Bruin Lagoon, Bruin, Pennsylvania, Butler County. Prepared by Groundwater & Environmental Services, Inc. for Commonwealth of Pennsylvania Department of Environmental Protection. June 2015.

Annual Post Closure Monitoring Report 2015, Bruin Lagoon, Bruin, Pennsylvania, Butler County. Prepared by Groundwater & Environmental Services, Inc for Commonwealth of Pennsylvania Department of Environmental Protection. March 2016.

Annual Post Closure Monitoring Report 2016. Bruin Lagoon, Bruin, Pennsylvania Butler County. Prepared by Groundwater & Environmental Services, Inc for Commonwealth of Pennsylvania Department of Environmental Protection. March 2017.

Bruin Lagoon, Cleanup Complete at Bruin Lagoon and Hranica Landfill Superfund Sites, Sites to be Removed from the National Priorities List. EPA Region 3. September 1997.

Bruin Lagoon Closeout Report. EPA Region 3. March 1992.

Bruin Lagoon – Implementation of Institutional Controls Comments. EPA Region 3. June 2005.

Deed Notice Comments, Bruin Lagoon Superfund Site. EPA Region 3. February 2004.

Explanation of Significant Differences for the Bruin Lagoon Superfund Site, Bruin Borough, Butler County, Pennsylvania. EPA Region 3. September 2015.

Fifth Five-Year Review Report for Bruin Lagoon Superfund Site, Bruin Borough, Butler County, Pennsylvania. EPA Region 3. September 2014.

Five Year Review for the Bruin Lagoon Site, Bruin Borough, Pennsylvania. Prepared by the U.S. Department of the Army Corps of Engineers, Omaha District, Omaha, Nebraska for EPA Region 3. December 1992.

Five Year Review Report, Bruin Lagoon Superfund Site Butler County, Bruin, Pennsylvania. EPA Region 3. July 1999.

Fourth Five-Year Review Report for Bruin Lagoon Superfund Site, Bruin Borough, Butler County, PA. EPA Region 3. September 2009.

Record of Decision: Bruin Lagoon, EPA ID: PAD980712855 OU1 Bruin Borough PA. EPA Region 3. June 1982.

Record of Decision, Remedial Alternative Selection, Bruin Lagoon Site, Bruin Borough, Pennsylvania. EPA Region 3. September 1986.

Third Five-Year Review Report for Bruin Lagoon Superfund Site, Bruin Borough, Butler County, PA. EPA Region 3. July 2004.

APPENDIX B – SITE CHRONOLOGY

Table B-1: Site Chronology

Event	Date
Bruin Oil Company disposed of waste in 1-acre lagoon	1930-1970
Lagoon earthen dike was breached and estimated 3,000 gallons of acidic	1968
sludge spilled into South Branch of Bear Creek, killing about 4 million	
fish in Allegheny River	
EPA and PADEP conducted initial site inspection	September 1981
EPA conducted RI/FS for OU1	July 1981 - February 1982
EPA issued the OU1 ROD	July 1982
EPA proposed Site for listing on the NPL	December 30, 1982
EPA completed OU1 remedial design	March 1983
Remedial action on-site activities for OU1 began	August 1983
EPA listed Site on the NPL	September 8, 1983
EPA declared emergency at the Site because toxic gases containing high	May 1984
concentrations of carbon dioxide, sulfuric acid mist and hydrogen sulfide	-
were released from the lagoon when a previously unidentified sludge	
layer was penetrated during remedial construction	
EPA discontinued remedial action and initiated new RI/FS	August 1984
EPA completed OU2 RI/FS Report	June 1986
EPA issued OU2 ROD	September 1986
USACE started remedial design for OU2	January 1988
EPA signed Superfund State Contract for OU2 remedial action	December 1988
USACE initiated OU2 on-site remedial action activities	March 1989
USACE completed OU2 on-site remedial action activities	July 1991
EPA transferred OU2 O&M responsibilities to PADEP	October 1991
EPA issued Site's Construction Close-Out Report	March 27, 1992
EPA completed Site's first FYR Report	April 7, 1993
EPA deleted the Site from the NPL	September 1997
EPA completed Site's second FYR Report	July 6, 1999
Commonwealth of Pennsylvania filed Administrative Order notice issued	September 18, 2000
with the Recorder of Deeds for Butler County	
EPA completed Site's third FYR Report	July 29, 2004
EPA completed Site's fourth FYR Report	September 17, 2009
EPA issued Addendum to FYR Reports	August 30, 2010
EPA completed Site's fifth FYR Report	September 17, 2014
EPA issued ESD to include a requirement for institutional controls	September 28, 2015

APPENDIX C – PRESS NOTICE

Published in the Butler Eagle June 3, 2019

EPA PUBLIC NOTICE

EPA REVIEWS CLEANUPBRUIN LAGOON SUPERFUND SITE

The U.S. Environmental Protection Agency (EPA) is reviewing the cleanup that was conducted at the Bruin Lagoon Superfund Site located in Bruin Borough, Pennsylvania. EPA inspects sites regularly to ensure that cleanups conducted protect public health and the environment. EPA's 2014 review of the site concluded that the cleanup was working as designed and is protective. Findings from the current review will be available in September 2019.

To access detailed site information, including the review report once finalized, visit:

https://www.epa.gov/superfund/bruinlagoon

For questions or to provide site-related information for the review, contact:

Gina Soscia, EPA Community Involvement Coordinator 215-814-5538 or soscia.gina@epa.gov

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APPENDIX D – INTERVIEW FORMS

For this Five-Year Review, forms were not utilized. The interviews are summarized below:

On June 14, 2019, EPA's Community Involvement Coordinator for the Site conducted a phone interview with the Director of Emergency Services for Butler County. The Director was familiar with the site and expressed satisfaction with the effectiveness of the remedy. He stated there has not been any issues at the site that have required emergency response or visits. He feels the community has knowledge of the site but is not concerned about its status and it has had little impact on the community. He did not have any suggestions or recommendations for EPA moving forward.

On October 24, 2018, the RPM discussed the ongoing work and the Five-Year Review at the Site with representatives of DEP. They reported that current interest in the Site is minimal with only few inquiries, and no negative comments received from the general public in the last five years.

APPENDIX E – SITE INSPECTION CHECKLIST

FIVE-YEAR REVIEW SITE INSPECTION CHECKLIST				
I. SITE INFO	I. SITE INFORMATION			
Site Name: Bruin Lagoon	Date of Inspection: 10/24/2018			
Location and Region: Bruin Borough, Pennsylvania; Region 3	EPA ID: PAD980712855			
Agency, Office or Company Leading the Five-Year Review: EPA	Weather/Temperature: Partly Cloudy, 40s			
Remedy Includes: (Check all that apply)				
Attachments:	Site map attached			
II. INTERVIEWS	(check all that apply)			
1. O&M Site Manager Name Interviewed at site at office by phone : Problems, suggestions Report attached:	Title Date			
2. O&M Staff Name Interviewed at site at office by phone roblems/suggestions Report attached:	Title Date			
response office, police department, office of pubrecorder of deeds, or other city and county office Agency Contact Name Problems/suggestions Report attached:	le Date Phone No.			
Agency Name Contact Name Tit Problems/suggestions Report attached: Agency				
Contact Tit Problems/suggestions Report attached:				
Agency Contact Name Problems/suggestions \[\square \text{Report attached:} \]				

	Agency Contact Name Problems/suggestions Re	Title	- Date	Phone No.	
4.	Other Interviews (optional)	Report attached:			
		MENTS AND RECO	PRDS VERIFIED (check	c all that apply)	
1.	O&M Documents			∇ I N	T / A
	O&M manual	Readily available	Up to date	⊠ N	
	As-built drawings	Readily available	Up to date	⊠ N ⊠ N	
	Maintenance logs	Readily available	☐ Up to date	⊠ N	1/A
2.	Remarks: Site-Specific Health and S	Sofaty Plan	Readily available	Up to date	N/A
۷.	Contingency plan/emerg	•	Readily available	Up to date	⊠ N/A
	Contingency plan/emerg	gency response plan	Readily available	□ ор ю date	M IVA
	Remarks:				
3.	O&M and OSHA Trainin	g Records	Readily available	Up to date	N/A
	Remarks:				
4.	Permits and Service Agre	ements			
	Air discharge permit		Readily available	Up to date	N/A
	☐ Effluent discharge		Readily available	Up to date	N/A
	Waste disposal, POTW		Readily available	Up to date	N/A
	Other permits:		Readily available	Up to date	⊠ N/A
	Remarks:				
5.	Gas Generation Records		Readily available	Up to date	⊠ N/A
	Remarks:				
6.	Settlement Monument Re	ecords	Readily available	Up to date	⊠ N/A
	Remarks:				
7.	Groundwater Monitoring Records		Readily available	Up to date	□ N/A
_	Remarks:				
8.	Leachate Extraction Reco	ords	Readily available	Up to date	⊠ N/A
0	Remarks:				
9.	Discharge Compliance Re		□ 1 1 . 1 .	Ma	T / A
	☐ Air	Readily available	Up to date	⊠ N ⊠ N	
	Water (effluent)	Readily available	Up to date	⊠ N	N/A
	Remarks:				

10.	Daily Access/Security Logs	☐ Readily available ☐ Up to date ☐ N/A		
	Remarks:			
	IV. O&	M COSTS		
1.	O&M Organization			
	☐ State in-house	☐ Contractor for state		
	☐ PRP in-house	Contractor for PRP		
	Federal facility in-house	Contractor for Federal facility		
2.	O&M Cost Records			
	Readily available	Up to date		
	☐ Funding mechanism/agreement in place	Unavailable		
	Original O&M cost estimate: Break	down attached		
	Total annual cost by ye	ear for review period if available		
	From: To:	Breakdown attached		
	Date Date	Total cost		
	From: To:	Breakdown attached		
	Date Date	Total cost		
	From: To:	Breakdown attached		
	Date Date	Total cost		
	From: To:	Breakdown attached		
	Date Date	Total cost		
	From: To:	Breakdown attached		
	Date Date	Total cost		
3.	Unanticipated or Unusually High O&M Cos	ts during Review Period		
	Describe costs and reasons:			
	V. ACCESS AND INSTITUTIONAL	CONTROLS Applicable N/A		
A. Fencing				
1.	Fencing Damaged ☐ Location shown on site map ☐ Gates secured ☐ N/A			
	Remarks: No fence damage observed during site inspection			
B. Oth	er Access Restrictions			
1.	Signs and Other Security Measures	☐ Location shown on site map ☐ N/A		
	Remarks: No trespassing signs located at each gate			
C. Institutional Controls (ICs)				

1. Implementation and Enforcement							
Site conditions imply ICs not properly implemented							
Site conditions imply ICs not being fully enforced	☐ Yes No ☐ N/A						
Type of monitoring (e.g., self-reporting, drive by): <u>During monitoring event</u>							
Frequency: <u>Annual</u>							
Responsible party/agency: State contractor							
Contact							
Name Title	Date Phone no.						
Reporting is up to date	∑ Yes ☐ No ☐N/A						
Reports are verified by the lead agency	Yes No No						
Specific requirements in deed or decision documents have been met	Yes No N/A						
Violations have been reported	☐ Yes ☐ No ☐ N/A						
Other problems or suggestions: Report attached							
2. Adequacy ⊠ ICs are adequate ☐ ICs are inac	dequate N/A						
Remarks:							
D. General							
1. Vandalism/Trespassing	o vandalism evident						
Remarks:							
2. Land Use Changes On Site N/A							
Remarks:							
B. Land Use Changes Off Site ⊠ N/A							
Remarks:							
VI. GENERAL SITE CONDITIONS							
A. Roads							
1. Roads Damaged	oads adequate N/A						
Remarks:							
B. Other Site Conditions							
Remarks:	Remarks:						
VII. LANDFILL COVERS Applicable N/A							
A. Landfill Surface							
1. Settlement (low spots)	Settlement not evident						
Area extent:							
Remarks:	1						
2. Cracks							
	Cracking not evident						
Lengths: Widths:	☐ Cracking not evident Depths:						

3.	Erosion	Location shown on site map	Erosion not evident			
	Area extent:		Depth:			
	Remarks:					
4.	Holes	Location shown on site map	☐ Holes not evident			
	Area extent:		Depth:			
	Remarks:					
5.	Vegetative Cover	⊠ Grass	○ Cover properly established			
	No signs of stress	Trees/shrubs (indicate size and lo	cations on a diagram)			
	Remarks:					
6.	Alternative Cover (e.g., a	rmored rock, concrete)	⊠ N/A			
	Remarks:					
7.	Bulges	Location shown on site map	Bulges not evident			
	Area extent:		Height:			
	Remarks:					
8.	Wet Areas/Water Damag	ge Wet areas/water damage not e	vident			
	Wet areas	Location shown on site map	Area extent:			
	Ponding	Location shown on site map	Area extent:			
	Seeps	Location shown on site map	Area extent:			
	Soft subgrade	Location shown on site map	Area extent:			
	Remarks:					
9.	Slope Instability	Slides	Location shown on site map			
	No evidence of slope in	stability				
	Area extent:					
	Remarks:					
B. Ber	nches Applic	eable N/A				
		unds of earth placed across a steep land ity of surface runoff and intercept and c				
1.	Flows Bypass Bench	Location shown on site map	☐ N/A or okay			
	Remarks:					
2.	Bench Breached	Location shown on site map	☐ N/A or okay			
	Remarks:					
3.	Bench Overtopped	Location shown on site map	☐ N/A or okay			
	Remarks:					
C. Let	tdown Channels	Applicable N/A				
		control mats, riprap, grout bags or gabio unoff water collected by the benches to ies.)				

1.	Settlement (Low spots)	Location shown	on site map N	o evidence of settlement
	Area extent:		Deptl	1:
	Remarks:			
2.	Material Degradation	Location shown	on site map N	o evidence of degradation
	Material type:		Area	extent:
	Remarks:			
3.	Erosion	Location shown	on site map N	o evidence of erosion
	Area extent:		Depti	1:
	Remarks:			
4.	Undercutting	Location shown	on site map N	o evidence of undercutting
	Area extent:		Deptl	1:
	Remarks:			
5.	Obstructions	Type:	⊠ N	o obstructions
	☐ Location shown on site	map Are	ea extent:	
	Size:			
	Remarks:			
6.	Excessive Vegetative Gro	owth Ty	pe:	
	No evidence of excessive	ve growth		
	☐ Vegetation in channels	does not obstruct flow		
	Location shown on site	map Are	ea extent:	
	Remarks:			
D. Cov	er Penetrations	Applicable N	/A	
1.	Gas Vents	☐ Active	Pas	ssive
	Properly secured/locked	l X Functioning	Routinely sampled	☐ Good condition
	Evidence of leakage at 1	penetration	☐ Needs maintenance	□ N/A
	Remarks:			
2.	Gas Monitoring Probes			
	Properly secured/locked	f Functioning	☐ Routinely sampled	Good condition
	Evidence of leakage at j	penetration	☐ Needs maintenance	⊠ N/A
	Remarks:			
3.	Monitoring Wells (within s	surface area of landfill)	
	Properly secured/locked	l Functioning	☐ Routinely sampled	Good condition
	Evidence of leakage at 1	penetration	☐ Needs maintenance	⊠ N/A
	Remarks:			
4.	Extraction Wells Leachate		_	_
	Properly secured/locked	l	☐ Routinely sampled	Good condition

	Evidence of leakage at p		☐ Needs mai	intenance	⊠ N/A		
	Remarks:			1	N/ N/ A		
5.	Settlement Monuments	Located	☐ Routinely	surveyed	⊠ N/A		
F C	Remarks:as Collection and Treatment	Applicable	e N/A				
		Аррисави	N/A				
1.	Gas Treatment Facilities	☐ Thomas I doct	nation		Collection for reuse		
	☐ Flaring ☐ Good condition	☐ Thermal destr☐ Needs mainter			Collection for reuse		
	_	Needs manne	nance				
2	Remarks:	folds and Dining					
2.	Gas Collection Wells, Mani Good condition	☐ Needs mainte	nonce				
	Remarks:	Needs manne	nance				
3.	Gas Monitoring Facilities (e a gas monitorina	of adjacent hom	es or buildi	nas)		
J.	Good condition	Needs mainte	-				
	Remarks:		nance	1\\/71			
F. Co	over Drainage Layer	Applicable	le N/A				
1.	Outlet Pipes Inspected			□ N/A			
	Remarks:						
2.	Outlet Rock Inspected	∑ Functioning		□ N/A			
	Remarks:						
G. D	etention/Sedimentation Ponds	Applicable	le 🖂	N/A			
1.	Siltation Area ext	tent:	Depth:		□ N/A		
	Siltation not evident						
	Remarks:						
2.	Erosion Area ext	tent:	Depth:				
	Erosion not evident						
	Remarks:						
3.	Outlet Works	tioning			□ N/A		
	Remarks:						
4.	Dam Func	tioning			□ N/A		
	Remarks:						
H. R	etaining Walls	Applicable 🔀 🛚	N/A				
1.	Deformations	Location shown	on site map	☐ Defo	rmation not evident		
	Horizontal displacement:	_	Vertical displ	acement:			
	Rotational displacement:	_					
	Remarks:						

2.	Degradation	Location shown on site map	Degradation not evident			
	Remarks:					
I. Pei	rimeter Ditches/Off-Site Disc	harge	N/A			
1.	Siltation	Location shown on site map	Siltation not evident			
	Area extent:		Depth:			
	Remarks:					
2.	Vegetative Growth	Location shown on site map	□ N/A			
	✓ Vegetation does not imper	ede flow				
	Area extent:		Type:			
	Remarks:					
3.	Erosion	Location shown on site map	Erosion not evident			
	Area extent:		Depth:			
	Remarks:					
4.	Discharge Structure	☐ Functioning	⊠ N/A			
	Remarks:					
VIII.	VERTICAL BARRIER WA	LLS Applicable	N/A			
1.	Settlement	Location shown on site map	Settlement not evident			
	Area extent:		Depth:			
	Remarks:					
2.	Performance Monitoring	Type of monitoring:				
	Performance not monitor	ed				
	Frequency:		Evidence of breaching			
	Head differential:					
	Remarks:					
IX. G	GROUNDWATER/SURFAC	E WATER REMEDIES 🛛 Applica	able N/A			
A. G	roundwater Extraction Wells	s, Pumps and Pipelines	Applicable N/A			
1.	Pumps, Wellhead Plumbin	g and Electrical				
	Good condition A	ll required wells properly operating	☐ Needs maintenance ☐ N/A			
	Remarks:					
2.	Extraction System Pipeline	s, Valves, Valve Boxes and Other Ap	purtenances			
	Good condition N	leeds maintenance				
	Remarks:					
3.	Spare Parts and Equipmen					
	Readily available	Good condition Requires upg	grade Needs to be provided			
	Remarks:					
B. Su	B. Surface Water Collection Structures, Pumps and Pipelines					

1.	Collection Structures, Pumps and Electrical					
	Good condition Needs maintenance					
	Remarks:					
2.	Surface Water Collection System Pipelines, Valves, Valve Boxes and Other Appurtenances					
	Good condition Needs maintenance					
	Remarks:					
3.	Spare Parts and Equipment					
	☐ Readily available ☐ Good condition ☐ Requires upgrade ☐ Needs to be provided					
	Remarks:					
C. Tr	reatment System					
1.	Treatment Train (check components that apply)					
	☐ Metals removal ☐ Oil/water separation ☐ Bioremediation					
	☐ Air stripping ☐ Carbon adsorbers					
	☐ Filters:					
	Additive (e.g., chelation agent, flocculent): <u>Lime</u>					
	Others:					
	Good condition Needs maintenance					
	☐ Sampling ports properly marked and functional					
	☐ Sampling/maintenance log displayed and up to date					
	Equipment properly identified					
	Quantity of groundwater treated annually:					
	Quantity of surface water treated annually:					
	Remarks: Lime was added to surface of bedrock to neutralize acidity.					
2.	Electrical Enclosures and Panels (properly rated and functional)					
	□ N/A □ Good condition □ Needs maintenance					
	Remarks:					
3.	Tanks, Vaults, Storage Vessels					
	□ N/A □ Good condition □ Proper secondary containment □ Needs maintenance					
	Remarks:					
4.	Discharge Structure and Appurtenances					
	□ N/A □ Good condition □ Needs maintenance					
	Remarks:					
5.	Treatment Building(s)					
	☐ N/A ☐ Good condition (esp. roof and doorways) ☐ Needs repair					
	Chemicals and equipment properly stored					
	Remarks:					
6.	Monitoring Wells (pump and treatment remedy)					

	☐ Properly secured/locked ☐ Functioning ☐ Routinely sampled ☐ Good condition				
	☐ All required wells located ☐ Needs maintenance ☐ N/A				
	Remarks:				
D. Mo	onitoring Data				
1.	Monitoring Data				
	☐ Is routinely submitted on time ☐ Is of acceptable quality				
2.	Monitoring Data Suggests:				
	☐ Contaminant concentrations are declining				
E. M	onitored Natural Attenuation				
1.	Monitoring Wells (natural attenuation remedy)				
	☐ Properly secured/locked ☐ Functioning ☐ Routinely sampled ☐ Good condition				
	☐ All required wells located ☐ Needs maintenance ☐ N/A				
	Remarks: The monitoring wells used for this site are inspected for integrity and usability by PADEP's				
	contractor during sampling events. In 2018 no significant deficiencies wqere identified.				
	X. OTHER REMEDIES				
	re are remedies applied at the site and not covered above, attach an inspection sheet describing the physical				
nature	and condition of any facility associated with the remedy. An example would be soil vapor extraction.				
	XI. OVERALL OBSERVATIONS				
Α.	Implementation of the Remedy Describe issues and chearmations relating to whether the remedy is effective and functioning as designed				
	Describe issues and observations relating to whether the remedy is effective and functioning as designed.				
	Begin with a brief statement of what the remedy is designed to accomplish (e.g., to contain contaminant plume, minimize infiltration and gas emissions).				
	The remedy is intended to contain site contaminants and reduce or eliminate exposure to potential				
	receptors. The remedy, which includes a multi-layer cap and monitoring groundwater, is functioning as				
	intended.				
B.	Adequacy of O&M				
	Describe issues and observations related to the implementation and scope of O&M procedures. In				
	particular, discuss their relationship to the current and long-term protectiveness of the remedy.				
	O&M is conducted annually in accordance with the O&M Plan. O&M activities are adequate for current and long-term protectiveness.				
C.	Early Indicators of Potential Remedy Problems				
	Describe issues and observations such as unexpected changes in the cost or scope of O&M or a high				
	frequency of unscheduled repairs that suggest that the protectiveness of the remedy may be compromised				
	in the future.				
	The SSC governing PADEP's conduct of O&M responsibilities expires October 30, 2020. Provisions				
_	must be made to revise and continue the O&M program.				
D.	Opportunities for Optimization				
	Describe possible opportunities for optimization in monitoring tasks or the operation of the remedy.				
	None.				

Inspection Team Roster

Five-Year Review Site Inspection conducted October 24, 2018

In Attendance:

Jim Feeney, Remedial Project Manager, EPA Mariruth Hoffman, Environmental Chemist, DEP Charles Tordella, Environmental Group Manager, DEP Alison Cattani, Associate, Skeo

APPENDIX F – SITE INSPECTION PHOTOS



Entrance gate to the Site



Upgradient monitoring wells and residence



Gas vent, looking toward site entrance



Gas vents and fence along the South Branch of Bear Creek



APPENDIX G-DETAILED DATA REVIEW

Analytical data are presented as follows in this section:

- Groundwater analytical results are compared to RCRA concentration limits and comparison of upgradient and POC wells.
- Groundwater analytical results are compared to current Pennsylvania Act 2 Medium Specific Concentrations (MSCs).
- Groundwater analytical results are compared to baseline analytical results obtained in 1991 and 1992 to evaluate the effectiveness of the remedial action.
- Surface water analytical results are compared to PADEP Water Quality Criteria as contained in 25 Pennsylvania Code Chapter 93 to evaluate potential impacts to aquatic life.
- Gas vent direct reading measurement results are listed.

Groundwater Monitoring

PADEP monitors groundwater quality at 14 site wells (Figure 3). Wells are screened in the shallow, intermediate and deep bedrock and are grouped according to location (upgradient, downgradient, POC) (Table G-1).

Table G-1: Groundwater Monitoring Network

Well ID	Bedrock Zone	Monitoring Group	
W-02AR	Shallow		
MW-13S	Shallow		
W-02B	Intermediate		
W-03BR	Intermediate	Upgradient	
MW-13I	Intermediate	7	
MW-13D	Deep	7	
MW-14D	Deep	7	
W-05A	Shallow		
W-05B	Intermediate	Downgradient	
W-06A	Shallow		
W-07A	Shallow		
W-08B	Intermediate	DOC.	
MW-15D	Deep	POC	
MW-16D	Deep	7	

Comparison to RCRA Concentration Limits

The 1986 OU2 ROD recognized that regional groundwater quality is poor and dictated that groundwater quality outside and downgradient of the capped area at POCs had to meet concentration limits specified in 40 CFR § 264.94, or should be equivalent to the upgradient background groundwater quality, whichever is less stringent. To assess compliance with these standards, Table G-2 compares POC groundwater concentrations against RCRA limits and against upgradient concentrations. Except for chromium, all POC wells are less than the RCRA limits. The POC maximum chromium result (72 μ g/L) is similar to the maximum upgradient chromium result (47 μ g/L).

Table G-2: Groundwater Results Summary (2014-2018)

	RCRA	Maximum Concentrations (2014-2018)					
Constituent	Concentration	Upgradient	POC	Upgradient	POC	Upgradient	POC
	Limits	(Shallow)	(Shallow)	(Intermediate)	(Intermediate)	(Deep)	(Deep)
Arsenic	50	20 B	11 B	31 JB	4.2 J	16 B	19 B
Barium	1,000	72 J	43 J	110 J	33 J	290	62 J

	RCRA	Maximum Concentrations (2014-2018)					
Constituent	Concentration	Upgradient	POC	Upgradient	POC	Upgradient	POC
	Limits	(Shallow)	(Shallow)	(Intermediate)	(Intermediate)	(Deep)	(Deep)
Cadmium	10	1.2 J	5 J	0.31 J	2.4 J	0.33 J	7.6
Chromium	50	43	8.9	30	3.7 J	47	72
Lead	50	19	5.3 J	48	9.7 J	17	15
Mercury	2	0.04 J	< 0.2	0.091 J	< 0.2	< 0.2	< 0.2
Selenium	10	5.4 J	<10	13 J	<10	2.7 J	4.7 J
Silver	50	1.1 J	<5	0.94 J	<5	< 5	< 5

Notes:

Source: 2018 Annual Post Closure Monitoring Report

All results are for total metals

Non-detects are excluded unless all years are non-detect

All values reported in μ g/L **Bold** = exceeds the RCRA limit

J = estimated concentration

B = compound was found in the blank and sample

To further assess whether groundwater quality upgradient and at POC wells is similar, trend charts were created for paired wells. Based on historical groundwater flow directions, paired upgradient and POC wells were selected for the shallow and intermediate zones in the 2014 FYR and trend analyses were conducted. The well pairs were POC well W-07A paired with upgradient well W-02AR and POC well W-08B paired with upgradient well W-02B. For this FYR, these well pairs were analyzed to determine if concentrations at the POC wells remain equal to or lower than corresponding background wells. Only total metals for which detections were observed are included in the analyses. The trend charts for the well pairs are included in Appendix H. At both POC locations, metals concentrations were similar to or less than the corresponding upgradient well.

PADEP Annual Monitoring Results

Monitoring results are reported to EPA annually and are compared to the MSCs for Used Residential and Used Non-Residential Aquifers. EPA requested that PADEP use the Non-Used Residential MSCs to evaluate groundwater data because groundwater is not used in the site area due to regionally poor water quality; however, because of a contracting error in 2017 and 2018 the Used Aquifer MSCs were used for comparison. That error was corrected for 2019. Several laboratory reporting limits were noted above the MSCs for VOCs, SVOCs and metals, which is a recurring issue due to matrix interference. A summary of the detected groundwater monitoring results by analyte type are provided below.

Comparison to Standards – VOCs and SVOCs

Historically, VOCs and SVOCs were not a concern in groundwater at the Site. Results observed during this FYR period confirm historical observations. There were no VOC exceedances of the MSCs during this FYR period. Except for 1-4-dioxane results at W-06A, there were no SVOC exceedances of the Non-Used Residential MSCs during this FYR period. The 1,4-dioxane exceedances at W-06A are shown in Table G-3. The 1,4-dioxane concentrations have remained consistent during this FYR period and continue to only occur in the waste area.

Table G-3: 1,4-Dioxane in Groundwater, 2014 to 2018

Well ID	1,4-Dioxane					
well ID	2014	2015	2016	2017	2018	
W-06A	92	120	150	59	84	
W-06A (Duplicate)	120	190	180	97	NA	

Notes:

All values reported in µg/L

NA = duplicate sample not collected

Bold = exceeds Pennsylvania Act 2 Used Residential Aquifer MSCs

Bold = exceeds Pennsylvania Act 2 Non-Used Residential Aquifer MSCs

Pennsylvania Act 2 MSCs: Used Residential Aquifer MSC = 6.4 µg/L; Used Non-Residential Aquifer

 $MSC = 32 \mu g/L$; Non-Used Residential Aquifer $MSC = 64 \mu g/L$

<u>Comparison to Standards – Metals and General Chemistry</u>

Consistent with historic results at the Site, all wells on site have low-level concentrations of total and dissolved metals. The most elevated metals concentrations were observed for aluminum and iron. The MSC standards for aluminum and iron are secondary maximum contaminant levels (SMCLs). The aluminum and iron exceedances occur both upgradient and downgradient of the Site. The concentration ranges for total aluminum, total iron and sulfate are shown in Table G-4.

Table G-4: Aluminum, Iron and Sulfate in Groundwater (2014-2018)

Well ID	Aluminum (Total) (µg/L)	Iron (Total) (µg/L)	Sulfate (mg/L)
SMCL	200	300	250
W-02AR ^a	450 - 3,300	4,300 - 150,000	320 B – 597
W-02B ^a	46 J – 2,300	76,000 - 93,000	305 - 520
W-03BR	47 J - 200	55 J – 730	25 - 34.5
W-05A	910 ^b - 1,600	8,500 ^b – 14,000	110 - 140
W-05B	180 J - 4,900	2,100 - 130,000	324 – 470
W-06A	14,000 ^b - 51,000	120,000 - 190,000	750 – 1,100
W-07A	240 – 420	23,000 - 29,000	58.5 F1 – 74
W-08B	140 J – 170 J	89,000 - 100,000	190 - 303
MW-13Sa	340 - 5,000	54,000 - 92,000	443 – 500
MW-13D ^a	56 J	130,000 - 190,000	613 - 860
MW-13I ^a	96 J – 130 J	9,100 - 30,000	636 – 1,500 B
MW-14D ^a	44 J – 53 J	500 - 31,000	83.6 - 170
MW-15D	42 J – 170 J	57,000 - 190,000	333 - 680
MW-16D	60 J – 1,600	600 - 65,000	237 - 980

Notes:

 $\mu g/L = micrograms per liter$

mg/L = milligrams per liter

Bold = exceeds applicable standard

J = estimated concentration

B = compound was found in the blank and sample

ND = not detected

F1 = matrix spike and/or matrix spike duplicate recovery is outside acceptance limits

a. Upgradient well location

b. Higher concentration between parent sample and duplicate sample presented

Comparison to 1991 Baseline Sampling

Annual monitoring reports compare the total metals analytical results for select wells to the corresponding historic results from 1991 and flag any results that exceed the observed historic results. Generally, current concentrations are less than or similar to historical concentrations. Detected results downgradient of the Site from this FYR period were less than or within the same order of magnitude as historical results.

Surface Water Monitoring

Surface water sampling during this FYR period found that all VOCs and SVOCs were below PADEP surface water quality criteria at all locations except for 2-methylphenol in 2015. 2-Methyphenol slightly exceeded the applicable standard at SW-1 and SW-2, both upgradient of the Site. Surface water samples all exhibited low levels of total and dissolved metals. However, historically and during the current FYR period, aluminum, iron and manganese were often detected at elevated concentrations, but were less than the current PADEP criteria (Table G-5). Mercury and thallium were detected in 2016 at concentrations above their respective human health criteria (HHC) of 0.05 µg/L and 0.24 µg/L. Total mercury was detected at SW-04 at an estimated concentration of 0.15

 μ g/L. Total and dissolved thallium was detected at SW-03 at estimated concentrations of 3.3 μ g/L and 3.1 μ g/L, respectively.

Table G-5: Surface Water Concentration Range for Select Metals (2014 to 2018)

Amalasta	PADEP Criteria		CW 01	SW-02	SW-03	SW-04	CVV 05	
Analyte	CCC	CMC	ННС	SW-01	S W - U2	SW-03	SW-04	SW-05
Total								
Aluminum	NA	750	NA	44 J – 170 J	57 J – 120 J	41 J – 130 J	78 J - 160 J	79 J - 180 J
Iron	1,500	NA	NA	290 – 560 B	290 – 450 B	190 – 430 B	$410^{a} - 610^{a}$	380 - 650
Manganese	1,000	NA	NA	72 - 200	83 – 170 B	61 - 110	100 - 210	110 - 210

Notes:

All results reported in µg/L

Only detections reported in this table

J = estimated concentration

B = compound was found in the blank and sample

CCC = Criterion Continuous Concentration

CMC = Criterion Maximum Concentration

HHC = Human Health Criteria

a. Higher concentration between parent sample and duplicate sample presented

Surface water pH levels are intermittently below the PADEP standard of 6. In 2014, SW-01 and SW-02 (both upgradient of the Site) were below 6 at 5.47 and 3.35 standard units, respectively. In 2017, SW-01 and SW-03 were both slightly below 6 (5.92 and 5.80 standard units, respectively).

Gas Vent Screening

The 15 gas vents in the cap (V-1 through V-15) are screened annually for gaseous emissions. Five background locations are also are also screened (BG-1 through BG-5). Parameters include the lower explosive limit, oxygen, hydrogen sulfide, methane, sulfur dioxide, VOCs, carbon dioxide and hydrochloric acid. All oxygen results were within normal range (about 18-21 percent) at all monitoring locations during this FYR period. The lower explosive limit, hydrogen sulfide, sulfur dioxide and hydrochloric acid were not detected above zero during this FYR period at any monitoring location. Carbon dioxide was measured at concentrations ranging from 300 to 400 parts per millions (ppm) in 2014 at background and site gas vent locations but were not detected since then. Low-level VOCs were detected in 2014, 2016, 2017 and 2018 at some site gas vent locations. Methane was also detected in 2014 and 2018 but levels were not of concern. Detected results from this FYR period are shown in Table G-6.

Table G-6: Maximum Levels Detected in Gaseous Emissions (2014-2018)

Monitoring Locations	VOC	CH ₄	CH ₄	
Withittoring Locations	(ppm)	(% LEL)	(%)	
V-1	0.2	15	0.75	
V-2	0.3	15	0.75	
V-3	0.1	15	0.75	
V-4	0.4	15	0.75	
V-5	0.2	15	0.75	
V-6	1.5	20	1.0	
V-7	0.4	35	1.75	
V-8	0.4	20	1.0	
V-9	0.1	15	0.75	
V-10	0.2	20	1.0	
V-11	ND	10	0.5	
V-12	0.1	ND	0.2	
V-13	ND	ND	ND	
V-14	ND	ND	ND	
V-15	0.4	ND	ND	
BG-1	ND	ND	ND	

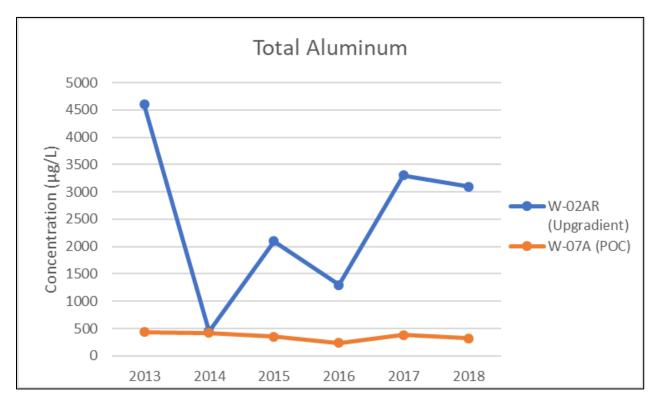
BG-2	0.2	ND	ND
BG-3	ND	ND	ND
BG-4	ND	ND	ND

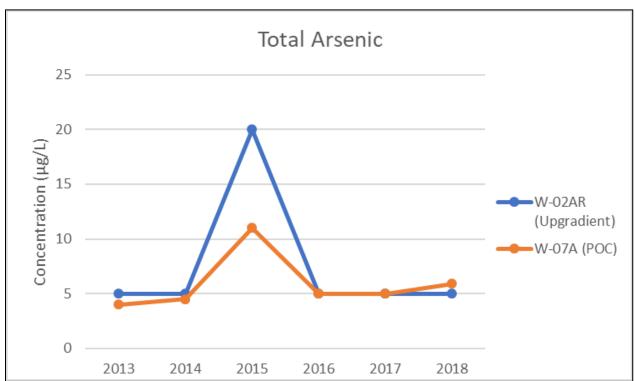
Notes:

CH₄ = methane
ppm = parts per million
% = percentage
LEL = lower explosive limit
ND = not detected

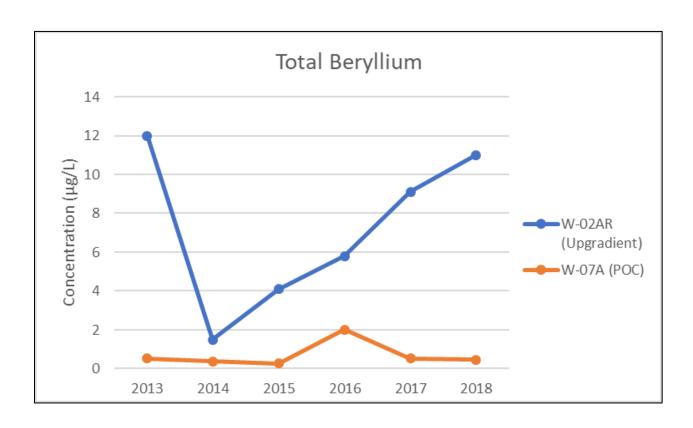
APPENDIX H – WELL PAIR CHARTS¹

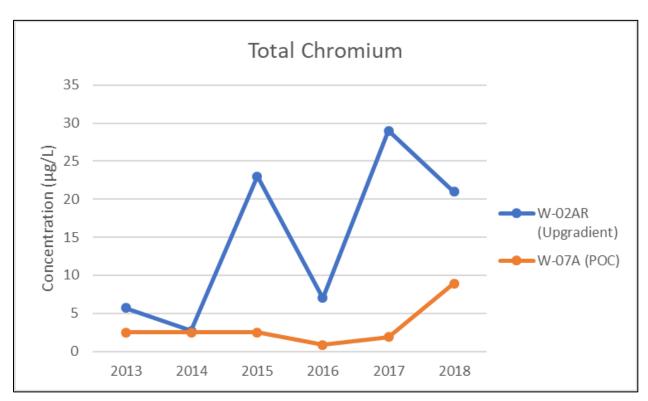
POC Well W-07A/Upgradient Well W-02AR Pair

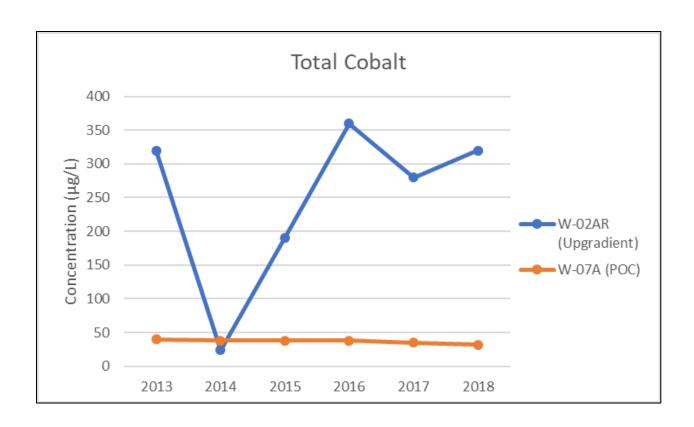


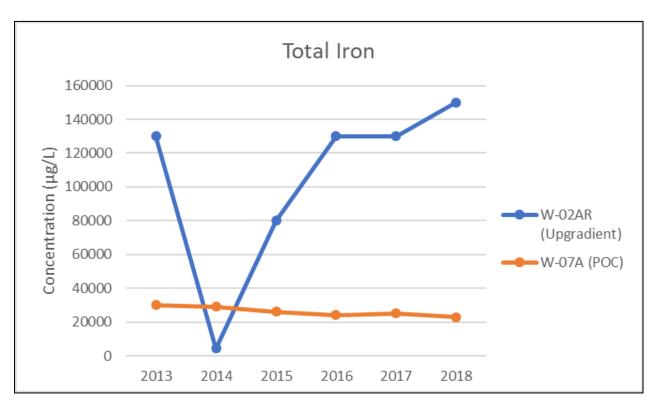


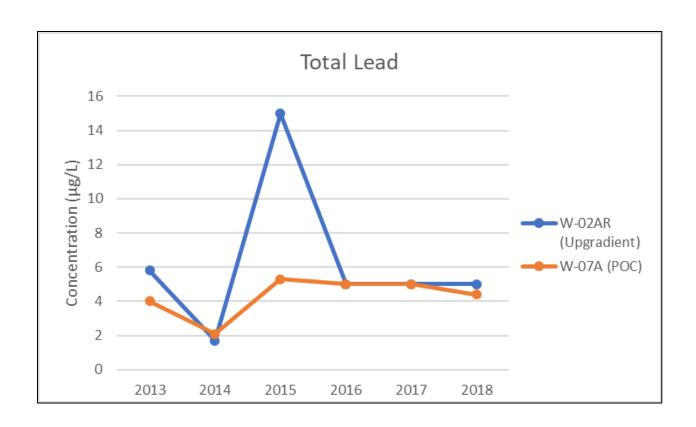
¹ Concentrations that were not detected are shown as ½ the detection limit.

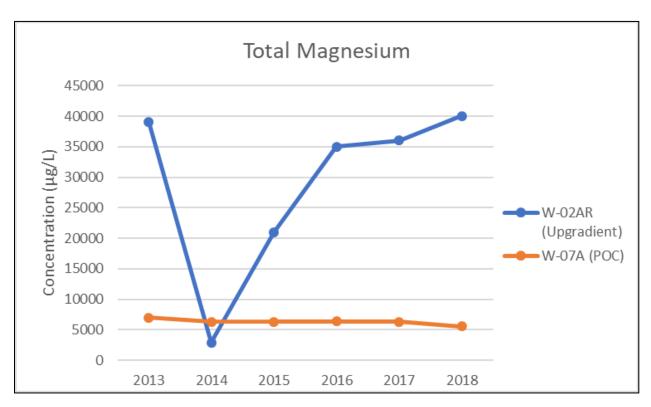


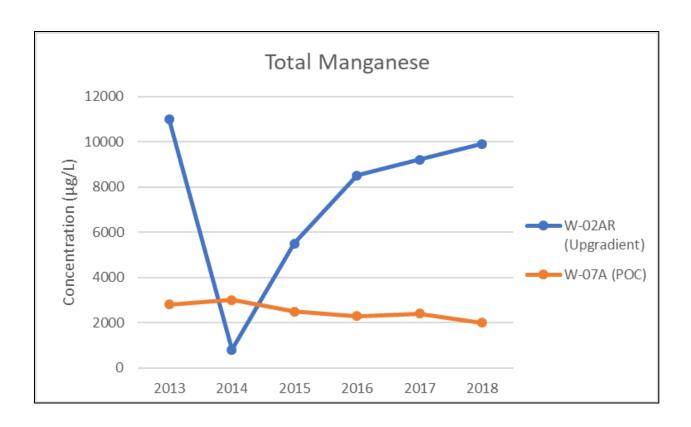


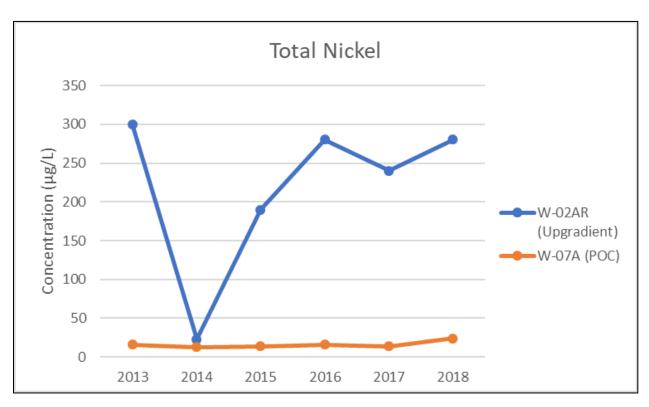


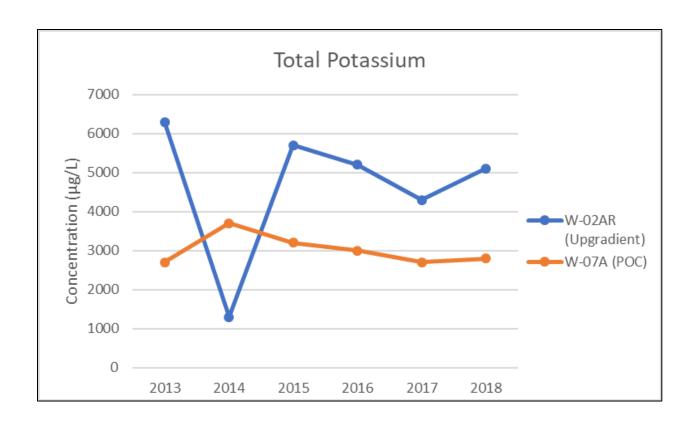


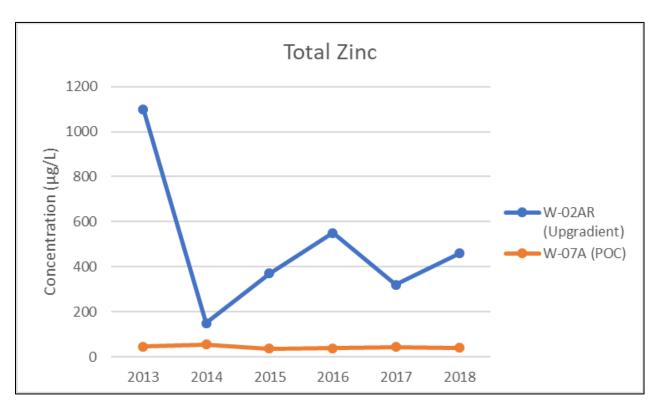












POC Well W-08B/Upgradient Well W-02B Pair

