### COMMONWEALTH OF PENNSYLVANIA

Department of Environmental Protection
Hazardous Sites Cleanup Program
Pool Doctor – Beaver Alkali Products
Rochester Borough, Beaver County
Southwest Region

### ANALYSIS OF ALTERNATIVES AND PROPOSED RESPONSE

The purpose of this Analysis of Alternatives and Proposed Response document is to outline the decision making process involved in the selection of the proposed response and to provide a description of the proposed response. This document will be included in the Administrative Record which will be compiled for this response pursuant to Section 506 of the Pennsylvania Hazardous Sites Cleanup Act, Act of October 18, 1988, P.L. 756 No. 108 ("HSCA"), 35 P.S. Section 6020.506.

The Pennsylvania Department of Environmental Protection (Department) initiated a Prompt Interim Response to abate the release and threatened release of chlorine and other unknown chemicals from the Site into the Ohio River and to minimize the risk of dealing with unknown contaminants in the event of a structure fire or building failure.

#### I. SITE INFORMATION

## A. Site Location and Description

The Pool Doctor - Beaver Alkali Products (Site) is located at one Brewery Place, 25 New York Ave. (more specifically parcel # 49-001-1909.000) in the Borough of Rochester, Beaver County, Pennsylvania. The Site is immediately adjacent to the Ohio River, and residential areas of both Rochester and East Rochester Boroughs. The Site consists of many drums of unknown liquids and solids that are corroded and leaking. These drums were associated with a swimming pool chemical business and laboratory that operated out of the buildings located on the above referenced parcel. Currently, the buildings are in a state of dilapidation and disrepair. The roofs of two buildings where the drums are located are collapsing. One of the buildings almost completely collapsed the week of June 24, 2019, which is the reason for the Prompt Interim Response.

Strong odors, from the chemicals, can be encountered within 30 feet of the building and access to the buildings is unrestricted.

# B. Site History

The Site was the location of a swimming pool chemical business and there are remains of a chemical laboratory.

### C. Threat of Release of Hazardous Substances

The threat from the Site to human health or welfare is the direct contact of the contamination to persons entering the area where the leaking drums are located and encountering the waste material that has leaked from the drums. There is indication that trespassers have entered the buildings. One of the garage doors in the back of the building is open or missing and drums have been moved around inside the building. Many windows have been broken and the front door of the laboratory has been kicked in. There is a potential threat of inhalation of toxic fumes to the surrounding community and Fire Fighters in the event of a fire occurring at the Site. The potential for a fire is high due to the condition of the buildings and the age of the buildings. Members of the Rochester Fire Department have spoken with DEP Staff about the Fire Department's concern to the surrounding community and to members of their Department if a fire should break out in one of these buildings involving the drums of chemicals inside.

The current threat to the environment is the ongoing release of waste materials due to the continued worsening conditions of the buildings. The collapsed roofs allow rain and snow to enter the buildings causing release of the waste materials into the surrounding soils and potentially the Ohio River.

Observations at the Site and knowledge of the past business operations indicate that, at a minimum, there is chlorine present that will need removed and disposed of as hazardous waste. There are also many containers of unknown chemicals in unlabeled containers that must be characterized and disposed of properly. Due to the dilapidated condition of the buildings, not much information is currently known about the number, condition, or contents of the unlabeled containers.

### II. RESPONSE CATEGORY

A prompt interim response is necessary at the Site because the increased exposure of these chemicals warrants a response that should not be delayed for the length of time that it would take to develop and close an administrative record (3-6 months). The condition of the buildings housing the chemicals continues to get worse, and one has already collapsed.

The response will cost less than two million dollars and will take less than one year.

#### III. CLEANUP STANDARDS

This proposed response is not a final remedial response pursuant to Section 504 of HSCA and therefore is not required to meet the cleanup standards which apply to final remedial responses. Additional response action may be required to achieve a complete and final cleanup for the site.

### IV. APPLICABLE, RELEVANT and APPROPRIATE REQUIREMENTS (ARARs)

The following standards, requirements, criteria or limitations are legally applicable, or relevant and appropriate under the circumstances presented by the site.

The Pennsylvania Hazardous Sites Cleanup Act 108 (35 P.S. §6020.101)

The Pennsylvania Solid Waste Management Act (35 P.S. §§6018.101-6018.1003)

The Pennsylvania Land Recycling and Environmental Remediation Standards Act 2 (35 P.S. §6026.101 et seq.)

The Pennsylvania Clean Streams Law, Act of June 22, 1937, P.L. 1987, as amended, 35 P.S. §§691.1 – 691.1001.

### V. ANALYSIS OF ALTERNATIVES

#### Alternative 1. No Action

Description of Alternative:

This alternative consists of taking no action to characterize, remove, or properly dispose of the chemicals at the Site.

Compliance with ARARs:

This alternative does not comply with Section 501(a) of HSCA because the chemicals would remain on the site and the release of hazardous substances would continue to be a threat to human health and the environment.

Cost Effectiveness

There is no cost associated with this alternative, however, it will not address the ARARs.

### Alternative 2. Remove and properly dispose of chemicals remaining at the Site.

Description of Alternative:

The buildings storing the chemicals will be demolished or otherwise made safe for entry into the structures. The chemicals within the buildings will be sampled and categorized for proper waste disposal. All chemicals and containers will be disposed of at a Department approved facility. Once all the chemicals have been removed and disposed of, the Department will return the Site to pre-existing conditions to the extent practical leaving it in a safe and acceptable condition.

## Compliance with ARARs:

This alternative will comply with Section 501(a) of HSCA because the Department has taken an interim response to address hazardous substances at the Site to protect public health, safety, and the environment.

This alternative will comply with the Pennsylvania Solid Waste Management Act because all waste will be properly handled according to the Act and associated regulations.

### Cost Effectiveness:

The estimated cost for this alternative is \$296,395 and is effective in addressing the ARARs.

### VI. PROPOSED RESPONSE

The proposed selected alternative is Alternative 2: Remove and properly dispose of chemicals at the Site.

### VII. DEP APPROVALS

FOR THE COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Regional Director

7/5/19

Date