



ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

POST OFFICE BOX 301463 ♦ 1751 CONG. W. L. DICKINSON DRIVE 36109-2608
MONTGOMERY, ALABAMA 36130-1463
(334) 271-7700

JAMES W. WARR
DIRECTOR

April 14, 1998

FOB JAMES, JR.
GOVERNOR

MEMORANDUM

TO: Wm. Gerald Hardy, Chief
Hazardous Waste Branch
Land Division

WGH
4/15/98

THROUGH: Stephen A. Cobb, Chief
Industrial Facilities Section
Hazardous Waste Branch
Land Division

SA
4/15/98

FROM: Chip Crockett
Industrial Facilities Section
Hazardous Waste Branch
Land Division

ACC
4/14/98

Re: Evaluation of Status Under the RCRIS Corrective Action Environmental Indicator Event Codes (CA725 and CA750) Safety-Kleen Corporation, Gurley, Alabama EPA ID Number: ALD 004 009 40

Purpose of Memo

This memo presents an evaluation of the Safety-Kleen Corporation inactive service center (SKG), Gurley, Alabama, facility status in relation to the following RCRIS corrective action codes:

1. Human Exposure Controlled Release Determination (CA725)
2. Groundwater Releases Controlled Determination (CA750)

The applicability of these event codes adheres to the definitions and guidance provided by the Office of Solid Waste (OSW) in the July 29, 1994 memorandum to the Regional Waste Management Division Directors.

Human Exposures Controlled Determination (CA725)

There are three (3) national status codes under CA725. These status codes are:

1. YE - Yes, Applicable as of this date
2. NA - Previous determination no longer applicable as of this date
3. NC - No control measures necessary

Facsimiles: (334)
Administration: 271-7950
Air: 279-3044
Land: 279-3050
Water: 279-3051
Groundwater: 270-5631
Field Operations: 272-8131
Laboratory: 277-6718
Education/Outreach: 213-4399





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MEMORANDUM

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Page 2

EPA Region 4 added a regional status code to CA725 which tracks initial evaluations in which a determination is made that plausible human exposures to current contamination risks are not controlled. This regional status code is listed as "No, not applicable as of this date." Use of the regional status code is only applicable during the first CA725 evaluation. Evaluations subsequent to the first evaluation will use national status codes (i.e., YE, NA, and NC) to explain the current status of exposure controls.

Note that the three national status codes for CA725 are based on the entire facility (i.e., the codes are not SWMU specific). Therefore, every area at the facility must meet the definition before a YE, NA, or NC status code can be entered for CA725. Similarly, the regional status code "NO" is applicable only if plausible human exposures are not controlled in any areas of the facility. This particular CA725 evaluation is the first evaluation performed by ADEM for the SKG facility. During Environmental Indicator memo development, assumptions have to be made as to whether or not human exposures to current media are plausible and, if plausible, whether or not controls are in place to address these plausible exposures. This memo first examines each environmental media (i.e., soil, groundwater, surface water, and air) at the entire facility, including any offsite contamination emanating from the facility rather than from individual areas or releases. After this independent media by media examination is presented, a final recommendation is offered as to the proper CA725 status code for SKG.

The discussions, interpretations, and conclusions presented herein regarding contamination and exposures at the facility are based on the following reference documents:

- *RCRA Facility Assessment*, September 9, 1993
- *Post-Closure Permit Application*, July 21, 1994.
- *Groundwater Quality Assessment Report*, September 16, 1997
- *Soil Assessment Addendum Report*, February 17, 1998

Background Discussion

The SKG site, located at 201 Section Line Street in Gurley, Alabama, was operated as a collection and storage facility for spent and clean solvent used by various Safety-Kleen clients. The hazardous waste management facility consisted of one 15,000 gallon above-ground tank, a wet dumpster and associated piping to the aforementioned tank, and a drum storage building. Hazardous wastes managed at the site consisted of mostly spent mineral spirits but also included various spent solvents originating from solvent bath degreasing, cold parts cleaning, dry cleaning still bottoms and filters, and paint equipment cleaning.

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MEMORANDUM

April 14, 1998

Page 3

The facility was operated as an interim status hazardous waste storage facility until 1985. Safety-Kleen chose to close the site in-place (i.e. as a landfill) rather than obtain an operating permit. Final closure of the site was certified on December 21, 1995, in accordance with a closure plan approved by the Department. During the closure, the wet dumpster, storage tank, and associated piping was removed. Approximately eight feet of contaminated soils underlying the wet dumpster was excavated and backfilled with concrete. All remaining exposed soil was capped with an asphalt cover designed to parking lot standards. The drum storage building was pressure washed. Six groundwater monitoring wells were installed and a quarterly groundwater monitoring program was implemented. At the time of closure, low concentrations of Volatile Organic Compounds (VOCs), above background conditions, were observed in surficial soils and in the groundwater. This prompted the requirement to obtain a post-closure permit. The initial application was submitted on July 21, 1994. After several revisions, the application was determined to be complete on January 13, 1998.

A RCRA Facility Assessment (RFA) was completed September 9, 1993. The RFA identified only one Area of Concern (AOC), the location of a past mineral spirits spill, as requiring additional investigation in addition to the previously mentioned regulated units.

As part of the preparation of the permit application, a groundwater quality assessment program was implemented. The *Groundwater Quality Assessment Report*, September 16, 1997, concluded that the uppermost aquifer was not contaminated with hazardous constituents exceeding Maximum Concentration Limits (MCLs) prescribed by ADEM Admin. Code R. 335-7-2, 335-7-3, and/or 40 CFR 141. A supplementary soil assessment was also performed to further assess the surficial and subsurface soil contamination at the site. The *Soil Assessment Addendum Report*, February 17, 1998, concluded that surficial and subsurface soils were not contaminated with hazardous constituents above risk-based concentrations established by EPA Region III for residential scenarios. The report also concluded the soil concentrations did not pose a significant threat to groundwater contamination. Based on the data obtained by these studies, it was concluded that the site met the criteria established by the Department and EPA Region 4 for 'Risk-Based Clean Closure'. The SKG site was certified 'clean closed' and the Post-Closure Permit Application was withdrawn on April 3, 1998.

Media by Media Discussion of Contamination and the Status of Plausible Human Exposures

Based on the information provided by the *Groundwater Quality Assessment Report*, September 16, 1997, and the *Soil Assessment Addendum Report*, February 17, 1998 the site was certified clean closed in accordance with ADEM Admin Code R. 335-14-5-.07. This negates the need for further post-closure care and monitoring activities. No plausible human exposures from any media appear to exist.

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April 14, 1998

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Page 4

V. Status Code Recommendation for CA725

As explained in Section III and IV above, the SKG site has been certified 'clean-closed'. Thus, it is recommended that CA725 NC be entered into RCRIS.

VI. Groundwater Releases Controlled Determination (CA750)

There are three (3) status codes listed under CA750:

1. YE - Yes, applicable as of this date
2. NA - Previous determination no longer applicable as of this date
3. NR - No releases to groundwater

EPA Region 4 also added an additional status code which tracks the initial evaluations where a determination is made that groundwater releases are not controlled. This regional status code is listed as "NO, not applicable as of this date". Use of the regional status codes is only applicable in the first CA750 evaluation. Subsequent evaluations will use the national status codes (i.e., YE, NA, NR) to explain the current status of groundwater control.

Note that the three national status codes for CA750 are designed to measure the adequacy of actively or passively controlling the physical movement of groundwater contaminated with hazardous constituents above relevant action levels. The point where the success or failure of controlling the migration of hazardous constituents is measured is termed the designated boundary (e.g., the facility boundary, a line upgradient of receptors, the leading edge of the plume as defined by concentrations above action levels or cleanup standards, etc.). Therefore, every contaminated area of the facility must meet the definition before these events/status codes can be entered. Similarly, the regional status code is applicable if contaminated groundwater is not controlled in any one area of the facility.

This evaluation for CA750 is the first formal evaluation performed for the SKG site. Please note that CA750 is based on the adequate control of all contaminated groundwater at the facility.

The discussions in Sections III and IV are used as the basis for the following recommendation.

VII. Status Code Recommendation for CA750

Based on data contained in the documents referenced in Section II and the above discussions presented in Sections III and IV, groundwater is not contaminated above relevant action levels by releases from former process units, solid waste management units and/or areas of concern, or other past activities at this facility. It is therefore that CA750 NR be entered into RCRIS.

VHC/sem:L:SKG EI Memo

File: TSD/Madison Co./Safety-Kleen, Gurley

MEMORANDUM

April 14, 1998

Page 4

V. Status Code Recommendation for CA725

As explained in Section III and IV above, the SKG site has been certified 'clean-closed'. Thus, it is recommended that CA725 NC be entered into RCRIS.

VI. Groundwater Releases Controlled Determination (CA750)

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This evaluation for CA750 is the first formal evaluation performed for the SKG site. Please note that CA750 is based on the adequate control of all contaminated groundwater at the facility.

The discussions in Sections III and IV are used as the basis for the following recommendation.

VII. Status Code Recommendation for CA750

Based on data contained in the documents referenced in Section II and the above discussions presented in Sections III and IV, groundwater is not contaminated above relevant action levels by releases from former process units, solid waste management units and/or areas of concern, or other past activities at this facility. It is therefore that CA750 NR be entered into RCRIS.

VHC/sem:L:SKG EI Memo

File: TSD/Madison Co./Safety-Kleen, Gurley

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April 14, 1998

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V. Status Code Recommendation for CA725

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VI. Groundwater Releases Controlled Determination (CA750)

There are three (3) status codes listed under CA750:

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The discussions in Sections III and IV are used as the basis for the following recommendation.

VII. Status Code Recommendation for CA750

Based on data contained in the documents referenced in Section II and the above discussions presented in Sections III and IV, groundwater is not contaminated above relevant action levels by releases from former process units, solid waste management units and/or areas of concern, or other past activities at this facility. It is therefore that CA750 NR be entered into RCRIS.

VHC/sem:L:SKG EI Memo

File: TSD/Madison Co./Safety-Kleen, Gurley



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DON SIEGELMAN
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MEMORANDUM

April 7, 2000

To: Stephen A. Cobb, Chief *AC*
Hazardous Waste Branch
Land Division

Through: Heather Deese *H4D*
Industrial Facilities Section
Hazardous Waste Branch
Land Division

From: Chip Crockett *ACC*
Industrial Facilities Section
Hazardous Waste Branch
Land Division

RE: **Environmental Indicator (EI) Codes**
Fisher Industrial Services (ALD 981 020 894)
M&M Chemical Company (ALD 070 513 767)
Safety-Kleen Corp. – Gurley facility (ALD 000 776 807)

This memorandum documents a change in the RCRIS EI status codes for CA725 (Human Exposures Controlled determination) and CA750 (Groundwater Releases Controlled determination) for the above referenced facilities. Previously, these facilities carried the NC ('No Contamination') and NR ('No Release') status codes. Due to changes in the EI code system, these codes no longer exist. The equivalent status code under the current code system is YE (yes) for both CA725 and CA750 for each of the above referenced facilities.

VHC 0015453597 letters ADEM 000406

File: ~~Hazardous Waste/Correspondence/Fisher Industrial Services (ALD 981 020 894)~~
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VHC 00015453597 letters ADEM 000406

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