



**UNITED STATES**  
**ENVIRONMENTAL PROTECTION AGENCY**  
**REGION 3**  
**STATEMENT OF BASIS**  
**SAFETY-KLEEN SYSTEMS, INC.**  
**BRISTOL SERVICE CENTER**  
**BRISTOL, VIRGINIA**  
**EPA ID NO. VAD 981 042 955**  
**APRIL 29, 2009**

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## **I. INTRODUCTION**

### **A. Facility Name**

The United States Environmental Protection Agency (EPA) has prepared this Statement of Basis (SB) for the Safety-Kleen Systems Facility located at 2146 King Mill Pike, Bristol, VA 24201 (hereinafter referred to as the Facility ) EPA ID No. VAD 981 042 955.

The Facility is subject to the Corrective Action Program under the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act (RCRA) of 1976, and the Hazardous and Solid Waste Amendments (HSWA) of 1984, 42 U.S.C. Sections 6901 to 6992k. The Corrective Action Program is designed to ensure that certain facilities subject to RCRA have investigated and cleaned up any releases of hazardous waste and waste constituents that have occurred at their property.

Information on the Corrective Action Program can be found by navigating <http://www.epa.gov/reg3wcmd/correctiveaction.htm>.

### **B. Proposed Decision**

This SB explains EPA's proposed decision that Corrective Action is complete and no land use controls are required for the Facility. EPA's proposed decision is based on a review of EPA and Virginia Department of Environmental Quality (VDEQ) files regarding the environmental history of the Facility as presented in the Final RCRA Site Visit Report submitted on February 13, 2009. Based on this review, EPA has concluded that there are no current or unaddressed releases of hazardous waste or hazardous constituents from the Facility.

### **C. Importance of Public Input**

Before EPA makes a final decision on its proposal for the Facility, the public may participate in the remedy selection by reviewing this SB and documents contained in the Administrative Record (AR) for the Facility. The AR contains the complete set of reports that document Facility conditions, including a map of the Facility, in support of EPA's proposed decision. EPA encourages anyone interested to review the AR. A copy of the AR is available for public review from the EPA Region 3 office, the address of which is provided in Section V, below.

EPA will address all significant comments received during the public comment period. If EPA determines that new information or public comments warrant a modification to the proposed decision, EPA will modify the proposed decision or select other alternatives based on such new information and/or public comments. EPA will approve its final decision in a document entitled the Final Decision and Response to Comments (FDRTC).

## **II. FACILITY BACKGROUND**

Safety-Kleen began leasing the Facility in August 1981 to serve as an accumulation point for spent solvents and a distribution center for reclaimed solvents. Prior to 1981, the Facility had been used as a carpet and dairy storage outlet.

Spent solvents, used oil, and other wastes were transported by Safety-Kleen trucks to the Facility and stored on-site. Spent solvents were processed in a return and fill station, then stored in an on-site tank. Regular shipments from the Facility were taken to either regional Safety-Kleen recycling centers or a reclamation contractor. A large portion of these waste solvents were returned to Safety-Kleen after processing.

The site is approximately two acres in size and was comprised of the following:

- One building with office space and a warehouse area
- A container (drum) storage area
- Two smaller structures (paint waste shelter, and covered loading dock)
- Two return and fill stations
- One tank farm (two 10,000-gallon above ground storage tanks (ASTs))
- A waste oil storage tank area
- A former truck washing area
- A paved parking area

The Safety-Kleen Facility operated as a hazardous waste management facility under Interim Status and under a Hazardous Waste Management Permit between August 1981 and June 1994. Safety-Kleen employed between 13 and 20 employees at the site during its period of operation.

The facility is serviced by a public water supply and all sanitary wastewaters generated at the facility were discharged to the City of Bristol's local publicly-owned treatment works. The facility did not generate any industrial wastewaters. No wells existed at the Facility.

As of the August 2008 site visit, the Facility appeared to be occupied by Campbell Printing Company.

## **III. SUMMARY OF ENVIRONMENTAL HISTORY**

Safety-Kleen submitted a RCRA Permit Application in November 1980, however the application was withdrawn after the EPA determined that since the solvents were being beneficially reused, the Facility was not managing hazardous waste.

Following the redefinition of hazardous waste in January 1985, by the EPA, Safety-Kleen resubmitted a RCRA Part A Application in July 1985. Permit Application information indicated that the Facility stored up to 6,000-gallons of hazardous waste in containers and

10,000-gallons in tanks. The Facility processed 699 tons of hazardous wastes per year and operated as a large quantity generator (LQG) of hazardous waste.

RCRA Part B Permit Applications were submitted in July 1987 and February 1992, with revisions in May 1992. A Hazardous Waste Management Permit was issued by the Virginia Department of Waste Management (VDWM), predecessor to the VDEQ, in September 1992, under the Virginia Hazardous Waste Management Regulations (VHWMR). The Facility was permitted to store and manage hazardous waste in tanks and containers.

Safety-Kleen submitted an Air Emission Source Registration (No. 11086) in November 1989, however the Facility was determined to be exempt from air permitting requirements.

Safety-Kleen began terminating operations at the site in June 1994. The building was unoccupied from 1995 through 1998 as Safety-Kleen addressed closure requirements of the permitted hazardous waste management units under the oversight of the VDEQ.

Releases at the Facility were documented on April 4, 1988, June 15, 1988, and December 29, 1988. Additionally three releases were documented to have occurred from a truck washing area to asphalt.

A Closure Plan was submitted to the VDEQ in 1996. Revised Closure Plans were submitted to the VDEQ in 1997 and 1998; both plans were approved. In accordance with the Closure Plan, the facility decontaminated all tanks, equipment, and secondary containment of container and tank storage areas. All equipment used for the management of hazardous waste, used oil, and solvent products were removed from the site. Under the Closure Plan, the Facility was required to excavate impacted soils to a depth of 4 to 6 feet (or to bedrock). The removed soil under the Closure Plan also addressed areas where historic releases were documented (as noted above) from other solid waste management units (SWMUs) and areas of concern (AOCs). Approximately 2,000 tons of impacted soils were removed in order to meet the risk-based closure performance standards. The excavated soils were disposed off-site in a permitted landfill facility. Excavated soils were replaced with clean fill.

Safety-Kleen submitted the required closure certifications and Closure Report for the permitted hazardous waste management units at the site in June 1999. Clean closure of these units was approved by the VDEQ in July 1999, and deactivation of EPA ID No. VAD 981 042 955 was requested in August 1999.

In March 2000, Safety-Kleen requested a minor modification to the Hazardous Waste Management Permit to terminate the permit, which was terminated by the VDEQ.

The 20,000 gallon used oil tank was emptied, cleaned, and relocated to another Safety-Kleen facility at the time of closure of the Bristol Facility. No evidence of a release from the 20,000 gallon used oil tank was documented.

In summary, all media at the Facility were investigated and any contaminated soil was removed to meet “clean closure” risk-based performance standards. Releases that occurred at the Facility were documented and addressed in the Closure Plan and Closure Report for the Facility. All permitted hazardous waste management units were determined to be “clean closed” by the VDEQ in accordance with the approved Closure Plan.

#### **IV. EVALUATION OF EPA’S PROPOSED DECISION**

EPA has determined that its proposed decision for the Facility is protective of human health and the environment and that no further corrective action or controls are necessary at this time.

#### **V. PUBLIC PARTICIPATION**

Interested person are invited to comment on EPA’s proposed decision. The public comment period will last thirty (30) calendar days from the date the notice is published in a local newspaper. Comments may be submitted by mail, fax, e-mail, or phone to Mr. Denis Zielinski at the address listed below.

A public meeting will be held upon request. Requests for a public meeting should be made to Mr. Denis Zielinski at the address listed below. A meeting will not be scheduled unless one is requested.

The Administrative Record contains all the information considered by EPA for the proposed decision at this Facility. To receive a copy of the Administrative Record, contact Mr. Denis Zielinski at the address below:

U.S. EPA Region 3  
1650 Arch Street  
Philadelphia, PA 19103  
Contact: Mr. Denis Zielinski (3LC20)  
Phone: (215) 814-3431  
Fax: (215) 814-3114  
Email: [zielinski.denis@epa.gov](mailto:zielinski.denis@epa.gov)