



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III

STATEMENT OF BASIS

SAFETY-KLEEN SYSTEMS, INC.
JOHNSTOWN, PENNSYLVANIA
EPA ID # PAD 981736143

Prepared by
Office of Pennsylvania Remediation
Land and Chemicals Division
August 2014

Table of Contents

Section 1: Introduction.....	1
Section 2: Facility Background.....	2
Section 3: Summary of Environmental History.....	3
Section 4: Environmental Indicators.....	3
Section 5: Public Participation.....	4
Index to Administrative Record.....	5

Section 1: Introduction

The United States Environmental Protection Agency (EPA) has prepared this Statement of Basis (SB) to solicit public comment on its proposed decision for the Safety-Kleen Systems, Inc. (SK) facility located at 150 Allenbill Drive Johnstown, Johnstown, Pennsylvania 15904 (Facility). EPA's review of available information indicates that there are no unaddressed releases of hazardous waste or hazardous constituents from the Facility. Based on that assessment, EPA's proposed decision is that no further investigation or cleanup is required. EPA has determined that its proposed decision is protective of human health and the environment and that no further corrective action or land use controls are necessary at this time. This SB highlights key information relied upon by EPA in making its proposed decision.

The Facility is subject to EPA's 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. §§ 6901 et seq. (Corrective Action Program). 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 hazardous constituents that have occurred at their property. The Commonwealth of Pennsylvania (Commonwealth) is not authorized for the Corrective Action Program under Section 3006 of RCRA. Therefore, EPA retains primary authority in the Commonwealth for the Corrective Action Program.

Concurrently with this SB, EPA is soliciting comments on a draft Corrective Action Permit (Permit). Pursuant to 40 C.F.R. § 124.7, EPA has prepared this SB to describe the background and basis for the draft Permit and proposed decision.

EPA is providing a 45-day public comment period on this SB and Permit and may modify its proposed decision based on comments received during this period. EPA will announce its selection of a final decision for the Facility in a Final Decision and Response to Comments (Final Decision) after the comment period has ended. The Administrative Record (AR) for the Facility contains all documents, including data and quality assurance information, on which EPA's proposed decision is based. See Section 5, Public Participation, for information on how you may review the AR.

Section 2: Facility Background

Property for the Facility was purchased on December 23, 1986 from Richland Township (NUS, 1991). This service center replaced the Safety-Kleen service center formerly located in Stoystown, Pennsylvania, and serves customers in the same geographic region. Safety-Kleen moved their Stoystown operations to Johnstown on April 23, 1988.

The Facility is an active hazardous waste storage facility operating under a Pennsylvania Department of Environmental Protection (PADEP) Permit for Hazardous Waste Storage and Treatment No. PAD981736143 issued June 2, 2004. That permit subjects the Facility to closure requirements for the currently operating hazardous waste container storage areas and tanks to address any unknown or possible future releases. The 2.4-acre service center was designed to facilitate the handling (accumulation) and storage of the wastes (transfer station) resulting from the services offered by Safety-Kleen. The services include parts cleaner waste (mineral spirits and immersion cleaner), dry cleaner waste (filter cartridges, powder residue, and still bottoms), and paint waste (thinners and paints) collection/recovery.

The Facility is located in the Johnstown Industrial Park. The area is zoned for light industrial use. North and west of the property are large warehouse facilities. Immediately north, east and south of the facility is open and wooded land.

The property is rectangular in shape with the shorter side along Allenbill Drive. A large warehouse is located in the southern central portion of the property. An asphalt driveway/parking circles the warehouse, with parking located south, west, and northeast of the building. A loading dock is located on the east side of the warehouse. Farther east, beyond the loading dock and the driveway, is a retention pond. Three Aboveground Storage Tanks (ASTs) are located north of the warehouse, beyond a grassed area. Within the grassed area is the aboveground piping to the ASTs and a concrete pad. West of the warehouse, beyond the driveway, is a concrete pad/diked area containing the frac tank. The frac tank location was the original proposed location of the tank farm; however, the location did not meet specifications. The diked area was never used for storage, but it was occasionally used for truck parking.

On July 7, 1998, Safety-Kleen notified PADEP that Safety-Kleen Corporation merged with LES Acquisition, Inc. (a subsidiary of Laidlaw Environmental Services, Inc.) and the corporate name would change to Safety-Kleen Systems, Inc. The change of name to Safety-Kleen Systems, Inc. occurred on July 1, 1998.

On June 8, 2000, the Safety-Kleen Corporation filed for Chapter 11 bankruptcy. On December 28, 2012, Clean Harbors, Inc. announced the completion of its acquisition of Safety-Kleen, Inc.

A Facility location map is attached as Figure 1.

Statement of Basis

Section 3: Summary of Environmental History

The 1991 Environmental Priorities Initiative Preliminary Assessment (PA) performed by NUS Corporation for the EPA identified four solid waste management units (SWMUs) at the facility: a barrel (drum) washer (SWMU 1), a waste storage area (SWMU 2), a waste oil sample locker (SWMU 3), and a storage tank farm (SWMU 4). SWMUs 1, 2, and 4 handle or store hazardous waste. An Area of Concern (AOC) was identified during a November 2013 site visit in an 18,000 gallon frac tank located west of the building.

There have been no reports of major spills or releases at the facility from either the SWMUs, ASTs, or the AOC. Over the course of operations, minor spills have occurred. Copies of the spill reports, which include the date and a brief description of these spills, are maintained at the facility. Small spills were cleaned using rags and/or absorbent material.

EPA and Michael J. Baker Inc. visited the Facility on November 13, 2013 as part of the Environmental Indicator (EI) process and to document the findings of the releases described above. Based upon this Facility visit and information in the EI Inspection Report, EPA considers the spills and releases to have been remediated appropriately and protection of human health and the environment to have been achieved.

Section 4: Environmental Indicators

EPA sets national goals to measure progress toward meeting the nation's major environmental goals. For Corrective Action, EPA evaluates two key environmental indicators for each Facility: (1) current human exposures under control and (2) migration of contaminated groundwater under control. The EPA has determined that the Facility met the migration of contaminated groundwater under control and the current human exposures under control indicators on August 6, 2014.

Section 5: Public Participation

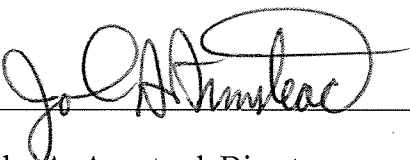
Before EPA makes a final decision on its proposal for the Facility, the public may participate in the decision selection process by reviewing this SB, Permit, and documents contained in the Administrative Record (AR) for the Facility. The AR contains all information considered by EPA in reaching this proposed decision. It is available for public review during normal business hours at:

U.S. EPA Region III
1650 Arch Street
Philadelphia, PA 19103
Contact: Kevin Bilash
Phone: (215) 814-2796
Fax: (215) 814-3113
Email: bilash.kevin@epa.gov

Interested parties are encouraged to review the AR and comment on EPA's proposed decision. The public comment period will last forty-five calendar days from the date that notice is published in a local newspaper. You may submit comments by mail, fax, or e-mail to Mr. Kevin Bilash. EPA will hold a public meeting to discuss this proposed decision upon request. Requests for a public meeting should be made to Mr. Kevin Bilash.

EPA will respond to all relevant comments received during the comment period. If EPA determines that new information warrants 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 announce its final decision and explain the rationale for any changes in a document entitled the Final Decision and Response to Comments (FDRTC). All persons who comment on this proposed decision will receive a copy of the FDRTC. Others may obtain a copy by contacting Mr. Kevin Bilash at the address listed above.

Date: 8.7.14



John A. Armstead, Director
Land and Chemicals Division
US EPA, Region III

Figure 1 – Facility Location Map

Statement of Basis

Index to Administrative Record

Preliminary Assessment, NUS Corporation, July 12, 1991

Environmental Indicator Inspection Report for Safety-Kleen Corporation, 150 Allenbill Drive
Johnstown, Industrial Park, Johnstown, Pennsylvania 15904, prepared by Michael Baker Jr., Inc.,
June 2014.

Statement of Basis



LAT=40°17'21.34"N
 LON=78°50'11.29"W

FIGURE 1
 FACILITY LOCATION MAP
 SAFETY-KLEEN SYSTEMS, INC.
 JOHNSTOWN, PENNSYLVANIA



MICHAEL BAKER JR., INC.
 MOON TOWNSHIP, PENNSYLVANIA

DATE: FEBRUARY 2014
 FILE: 132775_JTWN_01
 CHN: SRF

Source: Google, 2011

SCALE: 1"=120'
 S.O. NO.: 132775
 DSN/DWNS: SFR/RRR