



UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION III

STATEMENT OF BASIS

SAFETY-KLEEN SYSTEMS, INC.  
WEST CHESTER, PENNSYLVANIA

Prepared by  
Office of Pennsylvania Remediation  
Land and Chemicals Division  
February 2013

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## Section 1: Introduction

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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 1140-1142 Greenhill Road West Chester, West Goshen Township, Chester County, Pennsylvania, 19380 (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.

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

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The Safety-Kleen Systems, Inc. Facility is a 2.5-acre treatment, storage, and disposal (TSD) facility (USEPA ID No. PAD000738849) located in West Chester, Pennsylvania. This SB addresses the current Facility that occupies 6,300 square foot East Warehouse (1142 Greenhill Road), which was constructed by the property owner for Safety-Kleen in 1983, and the West Warehouse (1140 Greenhill Road) which was constructed in 1985 and expanded into in approximately 1986.

The East and West Warehouses contain operations, office space, return/fill stations, and drum/container storage areas. They both lie south of Greenhill Road. An Aboveground Storage Tank (AST) farm and drum/container storage area are located on the western side of the East Warehouse. There is a metal shed used as a 10 day transfer storage area. A 6-foot high chain link fence with barbed wire and electric security gates secure the operational areas in the back of the Facility. Concrete and asphalt curbs are present around the perimeter of both warehouses to contain and control runoff at the Facility. The West Warehouse property is graded such that surface runoff accumulates in the southwest corner of the asphalt-paved parking lot. The East Warehouse property is graded toward the PVC drainage pipe and discharges to a swale at the rear of the Facility.

The facility is located 0.4 miles southwest of the intersection of State Route 202 and East Boot Road. State Route 202 intersects Greenhill Road 0.1 mile northeast of the Facility. The Facility is zoned for light industrial use. Properties to the southeast and southwest are light industrial and commercial businesses. The neighboring building to the west is a multi-tenant building (Greenhill Business Park). A residential neighborhood is located directly northwest of the Facility, across Greenhill Road. Residential areas are also located to the northeast, east of Route 202.

A location map and a Facility layout are attached as Figures 1 and 2, respectively.

### **Section 3: Summary of Environmental History**

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EPA identified six Solid Waste Management Units (SWMUs) at the Facility. The six SWMUs are the (1) east drum/container storage area, (2) west drum/container storage area, (3) the four drum washer/wet dumpsters, (4) metal shed, (5) waste mineral spirits AST, and (6) waste antifreeze and waste oil AST, which was described as a two compartment AST.

Small quantity spills and releases have occurred in the SWMUs and other general Facility locations during routine operations and have been documented in a Spills Release Inventory. The majority of these spills and releases have been limited to SWMU concrete containment areas or paved areas. All of these small quantity spills and releases have been cleaned up with vacuum trucks and/or absorbents.

However, based on the Facility's Spill/Release Inventory Database, there were five incidents where small spills to the asphalt pavement driveway migrated to soils from releases from human or mechanical error. Product/waste involved in the releases included 105 Solvent, waste oil and mineral spirits, and ranged from 0.5 to 20 gallons. The Facility immediately contacted their emergency contractor to handle the remediation of each incident. All contaminated rock and soil was excavated and disposed. EPA does not consider these incidents to pose a current or potential threat to human health or the environment and determines that no further corrective action is necessary.

EPA and Michael J. Baker Inc. visited the Facility on January 12, 2012 as part of the Environmental Indicator (EI) process and to document the findings of the releases described above. Based upon 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**

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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 current human exposures under control and migration of contaminated groundwater under control indicators on February 26, 2013.

## Section 5: Public Participation

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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 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 thirty (30) 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: \_\_\_\_\_

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

Figure 1 – Facility Location Map

Statement of Basis

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## **Index to Administrative Record**

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Environmental Indicator Inspection Report for Safety-Kleen Systems, Inc., 1140-1142 Greenhill Road West Chester, Pennsylvania, 19380, prepared by Michael Baker Jr., Inc., May 2012.