



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III

STATEMENT OF BASIS

SAFETY-KLEEN SYSTEMS, INC.
WEST MIFFLIN, PENNSYLVANIA
EPA ID # PAD 982 576 258

Prepared by
Office of Pennsylvania Remediation
Land and Chemicals Division
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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 650 Noble Drive, West Mifflin, Pennsylvania 15122 (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

Operations at this facility began on August 1, 1988. The Facility serves Allegheny County and replaced the former Clairton facility. Safety-Kleen provides solvent distribution, collection, and reclamation services to companies primarily engaged in automobile repair, industrial maintenance, and dry cleaning. Under hazardous waste permit No. PAD982576258, the Facility stores hazardous waste in containers and one aboveground storage tank (AST) (15,000 gallons to store waste (spent) mineral spirit [parts washer] solvent) and also functions as an in-transit storage (10-day) Facility for various small quantities of hazardous and residual wastes. The in-transit wastes are stored in the in-transit waste storage area or a truck trailer. The Facility is a large quantity generator of hazardous waste, primarily consisting of spent parts washer solvents, spent immersion cleaner, dry cleaning wastes, and paint wastes.

The Facility is situated on one 2.83-acre parcel (Parcel A). Originally, a second parcel (Parcel B) located directly south of Parcel A was owned by the Facility. Parcel B was sold in 2004. No facility operations were conducted on Parcel B. The property is zoned for industrial use. The property is rectangular in shape with the shorter side along Noble Drive. A large metal warehouse is located in the northern central portion of the property. An asphalt driveway/parking circles the warehouse, with a large parking lot located south and a smaller parking lot located northeast of the building. A loading dock is located on the southwest side of the warehouse. A blind sump is located adjacent to the dock, underneath the in-transit trailer. An AST farm is located southeast of the warehouse. Eleven ASTs (the number of ASTs varied during facility operations) are currently located in the AST farm. The fill/removal areas for the ASTs are contained within metal boxes. The AST farm was very clean. The valves were locked. Beyond the AST farm is a strip of trees and grass. A gravel lot is located immediately south of the warehouse. It contains the propane tank storage shelter and often empty trailers and totes. A concrete pad is present in the southern portion of the Facility near the AST farm and the back gate. It was installed during construction of the Facility when development of Parcel B was still an option.

The Facility property and surrounding area is a former slag disposal site. Grasses, weeds, small shrubs and trees grow on/around the slopes of the slag pile. Less than ½-mile east of the facility, slag is being mined at the Lafarge-Duquesne Slag Aggregate Plant to be used as an aggregate material in construction.

Immediately north of the Facility is the Port Authority Bus Garage. East of the Facility is undeveloped land. South of the Facility is gravel truck parking for a gasoline service station. West of the Facility is a GetGo/WetGo (gasoline service station) and the Hot Metal Plaza (a small plaza containing retail stores and restaurants). The land further south of the Facility is undeveloped due to the presence of the Allegheny County Airport. Residential areas are located less than ¼-mile northeast of the Facility.

A Facility location map is attached as Figure 1.

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Section 3: Summary of Environmental History

There have been no reports of major releases at the Facility from either Solid Waste Management Units, ASTs, or the Areas of Concern. 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 that have occurred at the facility were limited to the warehouse/containment areas and paved areas and were cleaned using rags and/or absorbent material.

Two larger documented releases that occurred at the Facility in 2005 (40 gallons of waste oil) and 2011 (20 gallons of waste solvent) and as described below were immediately cleaned up with absorbent and the areas were pressure washed. There was no known release to soil or groundwater resulting from either of these spills.

September 22, 2005 Spill

On September 22, 2005, at approximately 2:30 pm, approximately 40 gallons of waste oil spilled onto the pavement during a waste oil pickup at the Facility. The driver completed filling the rear compartment of the truck. The driver then commenced to fill the center compartment. The driver stated he assumed the center compartment was the same size as the rear compartment and he overfilled the center compartment. Waste oil ran from the top of the tanker down the overflow pipes and onto the pad. The driver pushed the panic buttons. He was aware of these buttons due to the training he received at the Facility upon arrival. The Facility's material handlers immediately responded and contained the spill on the concrete pad. All of the material was cleaned up using absorbent pads. The concrete was then pressure washed and scrubbed with soap. All waste water from the cleanup was contained and was placed into the waste water tank.

August 23, 2011 Spill

On Tuesday, Aug. 23, 2011, a tanker truck unloading clean solvent, accidentally spilled approximately 20 gallons onto the asphalt pavement. Apparently, the valve cap vibrated from its perch and struck and opened the relief valve. The driver immediately closed the valve. Absorbent was applied, and the area was pressure washed. All waste waters and absorbent were drummed for disposal. Safety-Kleen was concerned that the solvent may have penetrated some cracks in the asphalt pavement. On August 24, 2011, Sunpro of Pittsburgh cored through the asphalt to collect one sample of the soil under the pavement. The sample was analyzed for VOCs and total petroleum hydrocarbons – oil range organics (TPH-ORO). Note: TPH-ORO are typically aromatics >C20-C35 associated with crude oil, heavy fuel oils, lubricating oils, waxes, and asphalt/pitch. No VOCs were detected; TPH-ORO was detected at 191 ppm. As a result of the release, the cracks in the pavement were repaired (asphalt was sealed) to prevent any seepage that may occur should a similar incident occur in the future. On August 26, 2011, a general inspection was performed by PADEP in response to the self-disclosure of the spill of the clean solvent.

There have been no hydrogeological investigations conducted at the Facility.

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EPA and Michael J. Baker Inc. visited the Facility on July 10, 2014 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 October 29, 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

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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

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Environmental Indicator Inspection Report for Safety-Kleen Systems, Inc., 650 Noble Drive, West Mifflin, Pennsylvania 15122, prepared by Michael Baker Jr., Inc., August 2014.

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