



Long-Term Stewardship Assessment Report

Safety-Kleen Systems, Incorporated

EPA ID #: WVD981034101

Wheeling, West Virginia 26003

Assessment Date: March 14, 2019

Introduction: Long-term potential stewardship (LTS) refers to the activities necessary to ensure that engineering controls (ECs) are maintained and that institutional controls (ICs) continue to be enforced. The purpose of the Environmental Protection Agency (EPA) Region 3 LTS program is to periodically assess the efficacy of the implemented remedies (i.e. ECs and ICs) and to update the community on the status of Resource Conservation and Recovery Act (RCRA) Corrective Action facilities. The assessment is conducted in twofold, which consists of a record review and a field inspection, to ensure that the remedies are implemented and maintained in accordance to the final decision.

Site Background: The Safety-Kleen Systems, Incorporated (Safety-Kleen) facility occupies an approximately 4-acre parcel located at 10 Industrial Park in Wheeling, West Virginia (Facility). Safety-Kleen has operated at the Facility since 1984 as an accumulation center for spent solvents generated by its customers and a distribution center for clean solvents to be delivered to its customers. The spent solvents are ultimately shipped to a Safety-Kleen recycling facility or a contract reclaimer, and then returned to the Safety-Kleen's customers as product. Structures include a building with offices and a warehouse for container storage, a flammable waste storage building, and two tank farms surrounded by concrete diking. The Facility is bisected by the Norfolk Southern Railroad and an intermittent stream (a branch of Lilley Run). The adhesive production building is located on the western portion and a warehouse occupies the eastern half of the Facility.

The surrounding area includes a mixture of light industrial and high-density residential properties. No structures are present on the area to the east of the Facility. Liquid Assets Disposal Incorporated, a company specializing in waste reduction, disposal, and recycling services, occupies the property upgradient to the southeast of the Facility. W A Wilson Incorporated, a glass distributor, is located cross gradient to the south of the Facility. The local publicly owned treatment works is located immediately southeast of the Facility boundary. Wheeling Creek circles around the northwestern margin of the Facility. Groundwater flows west across the Facility to Wheeling Creek, which is a tributary to the Ohio River.

West Virginia Department of Environmental Protection (WVDEP) issued a Hazardous Waste Management Permit, Permit Number: WVD981034101 to Safety-Kleen on April 8, 2004 for the

purposes of operating hazardous waste management units of one storage tank and two storage container areas. The Permit, which expired on April 8, 2014, has been administratively extended.

EPA conducted a Site Inspection (SI) on October 7, 2009 to consolidate relevant information for the Facility. During the SI, EPA noted two spill events have been recorded at the Facility. During the first spill in May 1990, Facility personnel discovered hydrocarbons discharging from a PVC pipe whose outfall was located near the northern corner of the Facility property. The outfall and the sump near the return and fill were immediately capped. In addition, Safety-Kleen personnel excavated soils containing minerals spirits down gradient of the PVC pipe outfall; approximately 60 cubic yards of soil were excavated and stockpiled. All work was completed under the auspices and approval of the West Virginia Department of Environmental Protection (WVDEP). As a result of groundwater monitoring conducted during the remediation, groundwater was found to contain perchloroethylene (PCE).

Current Site Status: On July 9, 2014, EPA issued the Final Decision and Response to Comments (FDRTC). The final remedy consists monitored natural attenuation (MNA) until drinking water standards are met and compliance with and maintenance of institutional controls. The final remedy detailed in the FDRTC is implemented through an Environmental Covenant between WVDEP and Safety-Kleen dated August 10, 2015 (Covenant).

Long-term Stewardship Site Visit: On March 14, 2019, EPA conducted a long-term stewardship site visit with WVDEP and Safety-Kleen to discuss and assess the status of the implemented remedies at the site.

The attendees were:

Name	Organization	Email Address	Phone No.
John Hopkins	EPA Region 3	hopkins.john@epa.gov	(215)814-3437
Kenan Cetin	West Virginia Department of Environmental Protection	kenan.cetin@wv.gov	(304)238-1220 Ext. 3507
Tim Johnson	Safety-Kleen Systems, Incorporated	timothy.johnson@safety-kleen.com	(410)942-8530
Stephen Fleming	Safety-Kleen Systems, Incorporated	stephen.Fleming@safety-kleen.com	513-227-5340

Institutional Controls (ICs) Status:

Environmental Covenant: The Covenant is the method for implementing institutional controls required as a condition of the Statement of Basis and Final Decision. The following ICs apply to the Safety-Kleen facility, shown on Figure 1:

Groundwater Use Restriction: Groundwater at the Facility property shall not be used for any purpose other than the monitoring or remediation activities required by WVDEP and EPA. Via email on May 28, 2018, Safety-Kleen representative Mr. Stephen Fleming confirmed that the City of Wheeling Water Department provides potable water to the Facility. There is one onsite well that provides non-potable water to the Facility. Warning signs which read “Do not drink the water” were observed in Facility restrooms.

General Property Use: The Property shall not be used in a way that will adversely affect or interfere with the integrity and protectiveness of the final remedy as set forth in the FDRTC. The Facility remains under continued use as an accumulation center for spent solvents.

Well Installation Restriction: No new wells shall be installed on Facility property unless it is demonstrated to EPA, in consultation with WVDEP, that such wells are necessary to implement the final remedy and EPA provides prior written approval to install such wells. There were no new wells or well drilling observed during the site visit.

Monitored Natural Attenuation: Nine (9) onsite groundwater monitoring wells are gauged and sampled semi-annually, during May and November, at the Facility. All wells are sampled and analyzed for VOCs, primarily tetrachloroethylene (PCE) and trichloroethylene (TCE). Groundwater at well MW-3 was not sampled during the May 2018 due to insufficient water volume.

Concentrations of PCE and TCE were detected above the West Virginia Groundwater Quality Standards in samples collected from Monitoring Wells MW-5, MW-6, MW-7, MW-8, and MW-9, with MW-5 exhibiting the highest dissolved phase concentrations.

Groundwater monitoring results are screened in comparison to West Virginia Groundwater Quality Standards (WVGWQS) which are equivalent to EPA Maximum Contaminant Levels. During the latest sampling event in May 2018, PCE concentrations in groundwater observed at five (5) of eight (8) monitoring wells exceeded the WVGWQS of 5 ug/L, with detected concentrations ranging from 31 ug/L in MW-8 to 440 ug/L in MW-5. TCE concentrations in groundwater observed at four (4) of eight (8) monitoring wells exceeded the MCL of 5 ug/L, with detected concentrations ranging from 8.9 ug/L in MW-9 to 20 ug/L in MW-6.

Monitoring wells with elevated PCE and TCE concentrations in groundwater are located near the western boundary of the adjacent to the Facility's tank farm. The highest contaminant concentrations were observed at monitoring well MW-5, which consistent with historical data. The most recent sampling events show that PCE and TCE groundwater concentrations are stable. Safety-Kleen will continue to monitor Facility groundwater on a semi-annual basis.

Reporting Requirements/Compliance: Safety Kleen is required to submit annual Corrective Action reports summarizing semi-annual sampling. The latest report was received on January 11, 2019. Safety-Kleen also submits annual environmental covenant compliance reports, the last of which was received May 2018. No transfer of property, change in use of the property, or work that will affect contamination at the property has been reported.

Mapping: The EPA facility website map is accurate and includes the 4-acre Safety Kleen facility. Arcadis provided EPA with geospatial information to define the groundwater use restricted area, as requested. A downloadable geospatial PDF map is available on EPA's corrective action facility webpage under the "Reports, Documents and Photographs" section, found [here](#).

Conclusions and Recommendations: No EC/IC deficiencies were identified. EPA has determined that the remedy institutional and engineering controls have been fully implemented.

Attachments:

Figure 1: Aerial Map of Safety-Kleen, Incorporated

Picture 1: Monitoring Well MW-1

Picture 2: Monitoring Well MW-2

Picture 3: Monitoring Well MW-3

Picture 4: Monitoring Well MW-4

Picture 5: Monitoring Well MW-5

Picture 6: Monitoring Well MW-6

Picture 7: Monitoring Well MW-7

Picture 8: Monitoring Well MW-8

Picture 9: Monitoring Well MW-9

Picture 10: Informational Sign in Facility Restroom #1

Picture 11: Informational Sign in Facility Restroom #2

Picture 12: Informational Sign in Facility Restroom #3



Figure 1: Aerial Map of Safety-Kleen, Incorporated

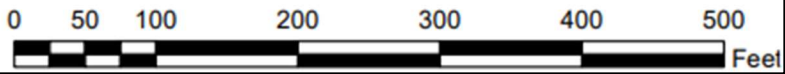


Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

Safety-Kleen Systems, Inc.
10 Industrial Park
Wheeling, WV
EPA ID # WVD981034101



-  ENTIRE_FACILITY
-  Parcel Boundaries



Picture 1: Monitoring Well MW-1



Picture 2: Monitoring Well MW-2



Picture 3: Monitoring Well MW-3



Picture 4: Monitoring Well MW-4



Picture 5: Monitoring Well MW-5



Picture 6: Monitoring Well MW-6



Picture 7: Monitoring Well MW-7



Picture 8: Monitoring Well MW-8



Picture 9: Monitoring Well MW-9



Picture 10: Informational Sign in Facility Restroom #1



Picture 11: Informational Sign in Facility Restroom #2



Picture 12: Informational Sign in Facility Restroom #3

