United States Environmental Protection Agency

Region 10 Emergency Response Unit

POLLUTION REPORT

I. HEADING

Date: October 13, 2000
Subject: CleanCare Removal Site (CleanCare), Tacoma, Washington
From: Michael Szerlog, OSC, USEPA, Region 10, Emergency Response Unit
Tel: Office (206) 553-0279
TO: See Distribution List on last page

POLREP No. 37 (Final)

II. BACKGROUND

Site ID:	SSID # 106W
Delivery Order No:	081-10 -02
Response Authority:	CERCLA,
CERCLIS No:	WASFN1002182
NPL Status:	Not Listed (former RCRA site within Commencement Bay Superfund site)
State Notification:	Washington State Department of Ecology referred site to EPA
Action Memo Status:	Signed on December 17, 1999 and January 7, 2000
Removal Start Date:	December 17, 1999
Expected Completion Date:	March 17, 2001
Site Web Page:	www.epa.gov/r10earth, click Index, click C for CleanCare. or use URL: http://yosemite.epa.gov/r10/cleanup.nsf/sites/CleanCare

III. SITE INFORMATION

A. Incident Category

This is a time-critical removal action at an inactive waste management facility.

B. Site Description

1. Site Location

The CleanCare site is located at 1510 Taylor Way in Pierce County, City of Tacoma, Washington at Township 21, Range 3 E. in Section 26. The site comprises approximately 4.2 acres latitude 47° 16' 25" North and longitude 122° 23' 32" West. The site is located in the "Tacoma Tideflats" area about three miles northeast of downtown Tacoma. The site is owned by David Bromley of Bromley-Marr ECOS Inc.

The CleanCare site was an interim status treatment, storage, disposal, and recycling (TSD) facility for off-site generated hazardous and non-hazardous wastes - one of a handful of commercial TSDs operating in the state of Washington. When the facility was in operation its major function was to solidify oily sludge wastes originating from catch basins, sumps, and storm drains; recycle waste oils, antifreeze, and spent solvents; and crush used oil filters for off-site recycling by other facilities.

The CleanCare facility has four separate tank farms (Tank Farm (TF)-1, TF-2, TF-3, and TF-4), two hazardous/dangerous waste container storage pads (container storage (CS) CS-4A and CS-4B), and a processing area where the distillation of solvent, oil, and antifreeze used to occur.

IV. Response Information

A. Situation

1. Current Situation

August 21, 2000 (Monday)
Personnel on site: 1 START
Weather: Cloudy in the morning Clearing in afternoon, high of 70 F.
All site personnel attended daily safety meeting and discussed site safety/planned activities. START conducted oversight of CH2M Hill Geoprobe activities funded by Emerald Services who has a security interest at the site. START also prepared for final air sampling event. ERRS was not on site.

August 22, 2000 (Tuesday)
Personnel on site: 1 START, 4 ERRS
Weather: Overcast in AM, partly cloudy in the afternoon, 70 -75 F
All site personnel attended daily safety meeting and discussed site safety/planned activities. START conducted air sampling event and oversaw the construction of the above ground water transfer system.

ERRS constructed the above ground water transfer system. System consists of PVC pipes and stationary pumps.

August 23, 2000 (Wednesday)
Personnel on site: 1 START, 2 ERRS
Weather: overcast in the morning then clear in the afternoon, 70 F
All site personnel attended daily safety meeting and discussed site safety/planned activities. START sent air sample to lab for analysis and demobilized the meterological station from site. ERRS continued construction of surface water transfer system and shipped 5,000 gallons of surface water from site for disposal. This represented the "first flush" of water from the site (sampling will be conducted after next rain event). No surface water was discharged.

August 29, 2000 (Tuesday)
Personnel on site: 1 START, 1 ERRS
ERRS contracted electrician was on site wiring the sump pumps for operation of the above ground surface water transfer system. ERRS continues to construct the surface water transfer system. START provides oversight and technical support.

September 3, 2000 (Sunday)
Personnel on site: 1 ERRS
ERRS arrived on site to transfer surface water to be stored in the API oil-water separator located on the south end of the CleanCare site.

September 8, 2000 (Friday)
Personnel on site: 1 START, 1 ERRS
ERRS and START conduct site walk with asphalt subcontractor. The subcontractor misread the bid and stated he couldn't start work on 9/18/00 as he had previously stated. ERRS began to talk with next subcontractor listed in the solicitation package. ERRS and START conducted air monitoring of the atmosphere inside of the AST's in Tank Farm #4 that still contain hardened residual sludge.

September 11, 2000 (Monday)
Personnel on site: 1 START
START arrived on site to sample water collected in the API oil water separator from the surface water transfer system. Samples were hand delivered to the lab for analysis.

September 15, 2000 (Friday)
Personnel on site: 1 START
START arrived on site to oversee the removal of surface water that had collected on site in the API oil-water separator and in Tank Farm #3

containment. This water did not meet the surface water discharge requirements of the State of Washington, as a result, it was disposed off site.

September 17, 2000 (Sunday)
Personnel on site: 1 ERRS
ERRS arrived on site to check site conditions and to transfer water that had ponded on site to the API oil-water separator.

September 18, 2000 (Monday)
Personnel on site: 1 START
START on site to oversee Philip Services Corporation representatives conduct groundwater level measurements.

September 20, 2000 (Wednesday)
Personnel on site: 1 START
START arrived on site to oversee Philip Services collect samples from the monitoring wells on site.

September 24, 2000 (Sunday)
Personnel on site: 1 ERRS
ERRS inspected the site and transferred water that had ponded on site to the API oil-water separator for storage.

September 26, 2000 (Tuesday)
Personnel on site: 1 START, 1 ERRS
ERRS subcontractor, HiGrade Asphalt Co., begins to prepare the cap locations for paving. ERRS and START provided oversight for development of the grade, sumps and berms onsite. HiGrade hauled and placed crushed recycled concrete for the development of the cap sub-grade.

September 27, 2000 (Wednesday)
Personnel on site: 1 START, 1 ERRS
START conducted oversight of cap sub-grade development and escorted Philips Services survey contractor on site. ERRS continued oversight of paving subcontractor Higrade Asphalt Co.

September 28, 2000 (Thursday)
Personnel on site: 1 START
START continues oversight of cap construction. Higrade completes construction of the sub-grade, including placement and compaction. Higrade completes the construction of soil berms on site. The berms were developed to prevent overland flow of surface waters to adjacent properties.

September 29, 2000 (Friday)
Personnel on site: 1 ERRS, 1 START
Higrade Asphalt Co. Begins and completes paving the three capped areas on site. START and ERRS conduct oversight of asphalt placement. One roll off container of non hazardous materials was removed from site by Puget Sound Trucking. EPA and Ecology met at Ecology's SW Regional office. Ecology agreed to take over operations and maintenance of the aboveground storm water management system as well as site security issues for the CleanCare site. Ecology requested that EPA open the effluent valve to allow the site to begin to drain to the Lincoln Avenue ditch. EPA notified Puyallup Tribe and City of Tacoma and faxed them copies of the storm water management plan and the sampling data.

September 30, 2000 (Saturday)
Personnel on site: 1 ERRS
ERRS installs sump pumps in the capped areas in Tank Farm #1 and the capped area south of Tank Farm #2. ERRS opened the effluent valve from the API oil-water separator and supplied power to the storm sewer lift sation pump located at the effluent end of the coalescing oil-water separator. This action allows the surface water management system to operate automatically. EPA demobilized from the site.

October 5, 2000 (Thursday)
Personnel on site: 1 START, 1 ERRS, 1 OSC
EPA, ERRS, and START met with representatives from the State of Washington DOE and City of Tacoma Public Works to transfer operations and maintenance of the site surface water management system. START developed a list of activities associated with the tranfer to be completed by ERRS.

October 6, 2000 (Friday)
Personnel on site: 1 ERRS
ERRS removed rented barricades that had been on site, placed post and chain barricades across access points to the asphalt capped areas, removed miscellaneous trash and debris and rerouted piping from the sump pump located in the capped area in between TF #3 and Bldg #1.

2. Removal Actions to Date

On January 7, 2000, the Action Memorandum to increase site ceiling, to ask for a $2 million exemption, a 12-month exemption, and a

change of scope was signed. A purchase request was also signed and ERRS was funded, incrementally, to begin removal activities.

The City (City of Tacoma Public Works) and State (Washington State Department of Ecology) provided assistance with the establishment of an interim storm water management plan. The water management system has been completed and implemented. The system will be managed by the State (WDOE).

RCRA Drums: All RCRA drums have been transported from site for disposal.

Oil Sludge Drums: All oil sludge has been transported from site for disposal.

Antifreeze Drums: All antifreeze (and Glycols) have been transported from site for disposal.

Solvent Drums: All solvent drums have been disposed of under contract with Safety Kleen.

RCRA Debris: All Drums and debris have disposed off site.

Baker Tanks®: All Baker Tanks have been removed from site.

Surface Water : A surface water management system has been developed and implemented on site. The State (WDOE) with assistance by the City of Tacoma will operate and manage the system.

ASTs : All liquid material has been transferred from site for disposal. Tanks # 27 and 29 (Tank Farm #4) still contain non-mobile sludge. Exhaustive attempts were made to remove the final one to two feet of sludge from these tanks. The tanks had their bottom valve opened and were allowed to gravity flow, when sludge did not flow from the bottom of the tanks for several days, it was deemed immobile. The Tanks had the valves at the bottom of the tank closed and had a perlite layer placed on top of the remaining sludge. The tanks then had their man way access closed. Air monitoring of internal conditions on September 8, 2000 resulted in the following values: Tank #27 LEL = 12%, Oxygen 21.1%, PID = 847 ppm; Tank #29 LEL = 13%, Oxygen 20.9%, PID = 749 ppm. Tank #6 in Tank Farm #2 has reportedly contained PCB oils. The tank had been emptied prior to the removal action, however, TSCA clean-up has not been completed on the tank.

Trucks, Trailers and Tankers: All TIP trailers have been removed from site. Two hot asphalt trailers that were deemed to have no value by the EPA and other interested parties were removed from site to facilitate any further cleanup actions that may occur onsite. Tanker 304A located between the sludge off loading area and the splitter/dehydrator unit has been drained, however, there is a potential for PCB residue to remain in this tanker. TSCA cleanup standards for PCBs will not be completed as part of the removal action activities. Tanker 304B remains onsite, all material has been removed, it has been pressure washed, and all access points have been closed.

Soil: Results of soil sampling and TPH screening have been reviewed and submitted to Washington State Department of Ecology and the law offices of Marten & Brown.

3. Enforcement

The Region currently has some information regarding potential responsible parties (PRPs) at the site. Relevant facility files and documentation have been transported to a secured federal building. Files and documentation developed during the removal action are currently being reviewed.

B. Planned Removal Activities

All Planned Removal activities have been completed.

C. Next Steps

A final removal action report will be completed and cost recovery process will continue.

D. Key Issues

Management of site surface water: A surface water management system has been implemented to transfer surface water to the City of Tacoma storm sewer line located at the south end of the property. The State of Washington and the City of Tacoma will operate and maintain the water transfer system.

I. Cost Information

Estimated costs are summarized below:

	Established Ceiling	Estimated Costs as of date listed, percent of budget expended
EPA	$ 300,000	$ 234,100 (10/3) 78.0%
START	$ 676,000	$ 563,700 (10/7) 83.3%
ERRS	$ 3,250,000	$ 3,224,402 (10/11) 99.2%
Coast Guard	$ 100,000	$ 123,800 (8/18) 123.8%
Total	$ 4,326,500	$ 4,146,002 (10/3) 96.4%

Note: The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

Waste Stream	Medium	Quantity	Containment-Migration Control	Treatment	Disposal
Used Oil Filters	solid and solidified waste	270 cu yd	placed liners in reliefs	removed oil filters from 55 gallon drums and consolidated in reliefs	Waste Management delivered to Olympic View Sanitary Landfill
Used Oil Filter Drums	solid waste	170 cu yd	placed liners in reliefs	crushed drums with an excavator to reduce volume	Phillips Services Corp. Delivered to Burmingham Steel for recycling.
Used RCRA Drums	solid waste	244 cu yd	placed liners in reliefs	crushed drums with an excavator to reduce volume	Phillips Services Corp. Delivered to Columbia Ridge Landfill.
	Solid waste	1050 Drums	placed liners in reliefs	Hauled from site to be decontaminated	Emerald transferred from site to be decontaminated and reused
Generator Drums	sludge and liquids	570 drums and 12 totes	NA	generators contracted with TSDs to properly manage their waste	Brought to various disposal companies
Oily Debris	solidified waste	100 cu yd	placed liners in reliefs	consolidated in reliefs	Phillips Services Corp. delivered to Olympic View Sanitary Landfill
Contact Rain Water	liquid	349,708 gal	contained in Baker Tanks®	Emerald Petroleum Services's (EPS) water treatment plant	EPS treated and transported to City of Seattle Sanitary Sewer
Contact Rain Water	liquid	123,400 gal	contained in Baker Tanks®	Phillips Services Corp. water treatment plant	Phillips Services Corp. treated and transported to City of Tacoma Sanitary Sewer
Contact Rain Water	liquid	440,000 gal	contained in Baker Tanks®	treated on site with temporary waste water treatment system	to City of Tacoma Sanitary Sewer
Baker Tanks®	solid	33 Tanks	NA	pressure washed, and wiped down	returned to Vendor (Baker Tanks®, Inc.)
Tip Trailers	solid	13 trailers	NA	transported off site to make room for other activities	temporarily stored at the Phillips Services Corp. facility adjacent to the site

Waste Stream	Medium	Quantity	Containment-Migration Control	Treatment	Disposal
Oil From Drums	liquid	142 drums + 4 totes	6,900 gallon poly tank on site	Transported off site for disposal	Removed by Emerald Petroleum with material from Tank 1
Antifreeze from Drums	liquid	65 drums	Bulked into Baker Tank® # 18	transported by Spencer	Delivered to Onyx for recycling
Tank Farm 1 Oily Water	liquid	21,100 gal	Bulked into Baker Tank® #10	transportation to be determined	to be determined
Solidified oil sludge	solid	654,000 lbs	in sludge pits	Transported from site	Waste Management transported to Arlington landfill
Tank 1 Layer 1	liquid	73,225 gal	Transferred to Vac Truck	transported by EPS	Delivered to EPS for recycling
Pallets	solid	36 tons	stacked in back lot	Transported from site	Burned off site by Recovery One
Tank 1 Layer 2	liquid	34,437 gal	Transferred to Vac Truck	transported by Phillips Services Corp.	Delivered to Phillips Services Corp for recycling
Tank 1 Layer 3	liquid	168,269 gal	Transferred to Vac Truck (74,169 gal) Transferred to Baker Tank® for temporary storage (20,000)	transported by Waste Management	Delivered to Waste Management facility in Arlington, OR for solidification and disposal
Tank 1 Layer 4	liquid	155,904 gal	Transferred to Vac Truck	transported by Emerald	Delivered to Emerald facility in Seattle for recycling
A-Fuel/Solvent from Drums	liquid	24,000 gal	Bulked into Baker Tank® #9	10,000 gallons transported off site by Safety Kleen	Delivered to Araganite facility in Utah for recycling
Glycol From Drums	liquid	5,000 gal	Bulked into Baker Tank® #18	transportation to be determined	to be determined
PRM Drums	Solid Waste	80 55-gallon drums	Transferred to Philips	Transferred by Philips Services Corp.	Delivered to Philips Services Corp for recycling
Tank-30 Wastewater	liquid	10,371 gal	Transferred to Vac Truck	Transferred by Emerald	Delivered to Emerald for treatment
Tank 5	liquid	44,165 gal	Transferred to Vac Truck	Transferred by Solpro/Prime	Delivered to Solpro/Prime for disposal

Tank 4	liquid	105,074 gal	Transferred to Vac Truck	Transferred by Solpro	Delivered to Solpro for disposal
Tank 5	oily water	24,500 gal	Transferred to Vac Truck	Transferred by Prime	Delivered to Prime for disposal
Tank Farm 2	liquid	62,724	Transferred to Vac Truck	Transferred by Emerald	Delivered to Emerald for disposal
Tank Farm 2	oily water	48,239 gal	Transferred to Vac Truck	Transferred by Emerald	Delivered to Emerald for disposal
Tank 21	Liquid Diesel	4,150 gal	Transferred to Vac Truck	Transferred by Safety Clean	Transported to Anacortes for recycling
Tank Farm 2	liquid	62,724	Transferred to Vac Truck	Transferred by Emerald	Delivered to Emerald for disposal
Tank Farm 2	oily water	48,239 gal	Transferred to Vac Truck	Transferred by Emerald	Delivered to Emerald for disposal
Tank 3	Liquid	112,705 gal	Transferred to Vac Truck	Transferred by Solpro	Delivered to Solpro for disposal
Tank 21	Liquid Diesel	4,150 gal	Transferred to Vac Truck	Transferred by Safety Clean	Transported to Anacortes for recycling
Vendor Drum	Product Drums	8 55-gallon drums	Transferred to VanWaters & Rodgers	Transferred by VanWaters and Rodgers	Transported for resale or use
Tank 5 Layer 2	liquid	9,789 gal	Transferred to Vac Truck	Transported by Emerald	Delivered to Emerald for recycling
Tank 25	Liquid Glycol	8,000 gal	Transferred to Vac Truck	Transported by Ecco	Delivered to Kennewick for recycling
Tank Farm 3 Tank 18	Oil/Water	22,500 gal	Transferred to Vac Truck	Transported by Prime	Delivered to Prime for disposal
Tank Farm 3 Tank 19	Oil/Water	22,500 gal	Transferred to Vac Truck	Transported by Prime	Delivered to Prime for disposal
Tank Farm 4 Tank	Solvent Waste	10,700 gal	Transferred to Vac Truck	Transported by Onyx	Delivered to Utah for disposal
20 yard sludge boxes	solidified sludge	38,000 pounds	loaded onto truck	Transported by Waste Management	Delivered to Waste Management
Oxidizer Drums	liquid	42 55-gallon drums	Transferred to PSC	Transferred by PSC	Delivered to Kent
Tank Farm 3 Tank 22	Oil/Water	34,326 gallons	Transferred to Vac Truck	Transported by Emerald	Delivered to EPS for disposal

Tank Farm 3 Tank 22	waste oil	8,928 gallons	Transferred to Vac Truck	Transported by Emerald	Delivered to Sol-Pro for disposal
Turbo Oil	Liquid	1,441 gallons	Transferred to Vac Truck	Transported by Emerald	Delivered to Emerald for recycling
Black Poly Tank	Solid	1 Tank	loaded onto truck	Transported by Baker Tank	Returned to Baker Tank
CleanCare Tanker Truck	Solid	2 Trucks	Drove Off Site	Transported by Emerald	Delivery to Emerald for Reuse
CleanCare Package Truck	Solid	4 Trucks	Loaded onto lowboy trailer	Transported by Emerald	Delivery to Emerald for reuse
Oily Water From Baker Tanks	Liquid	69,703 gallons	Transferred to Vac Truck	Transported by Emerald	Delivery to Emerald for Disposal
Tank Farm 4 A-Fuels	Liquid	16,590 gallons	Transferred to Vac Truck	Transported by Prime Environmental	Delivery to Continental Kiln in Hannibel MO.
Consolidated Sludge	Solidified Sludge	240 Yards	loaded onto truck	Transported by Waste Management	Delivered to Waste Management for disposal
Hydrochloric Acid	Liquid	3 55-gallon drums	loaded onto truck	Transported by Sol Pro	Delivered to facility in Chicago IL
Lab Pack Oxidizers	Liquid	4 drums	loaded onto truck	Transported by Onyx	Delivered to Onyx for disposal
Lab Pack water reactives	Liquid	1 drum	loaded onto truck	Transported by Onyx	Delivered to Onyx for disposal In Henderson, CO
Lab Pack Sodium Nitrites	Liquid	1 drum	loaded onto truck	Transported by Onyx	Delivered to Onyx for disposal In Henderson, CO
Waste Antifreeze	Liquid	2,690 gallons	Transferred to Vac Truck	Transported by PSC	Delivered to PSC for Disposal
Oily Debris	Solid	120 cubic yards	loaded onto truck	Transported by Waste Management	Delivered to Waste Management for disposal
Oily Water	Liquid	15,200 gallons	Transferred to vac truck	Transported by PSC	Delivered to PSC Georgetown facility for disposal
Waste Drums	Solid	3 drums of flammable solids	Loaded onto truck	Transported by PSC	Delivered to PSC Kent facility for disposal

Waste Drums	Liquid	13 aluminum Hydroxide, 16 Sodium Hydroxide, 1 ferric Chloride, 1 propylene glycol, 3 sodium nitrate	Loaded onto Truck	Transported by PSC	Delivered to PSC Georgetown facility for disposal
Waste PCB Oil	Liquid	2000 gallons	Transferred to Vac Truck	Transported by Aragonit	Delivered to Aragonit for disposal
Waste Drums	Solid	Flammable Solids and Dry Cell Batteries	Loaded onto Truck	Transported by PSC	Delivered to PSC Georgetown facility for disposal
Oily/Glycol	liquid	20,000 gallons	Transferred to Vac Truck	Transported by Emerald	Delivered to Emerald for disposal
Solvent Paint Sludge from TF#4	Sludge	4,044 gallons	Transferred to Vac Truck	Transported by Prime	Delivery to Continental Kiln in Hannibel MO.
Paint Waste	Liquid/sludge	59 drums	loaded onto truck	Transported by Prime	Delivered to Pollution Control Industries for disposal
RCRA Sludge	Sludge	20 cubic yards	loaded onto truck	Transported by PSC	Delivered for disposal at Kent facility
Oily Water	Liquid	50,024 gallons	Transferred to Vac Truck	Transported by Philips	Delivered for disposal at Kent facility
Surface Water	Liquid	4,000 gallons	Stored in API oil-water separator	Transported by Emerald	Delivered to Emerald for disposal
Acids and Lab Packs	Liquid	64 drums	loaded onto truck	Transported by Phillips	Delivered to Phillips for neutralization stabilization and disposal
Flammable Liquids	Liquid	2 drums	loaded onto truck	Transported by Emerald/Sol Pro	Delivered to Emerald/Sol Pro for disposal

VII Distribution

To: EPA Headquarters, Washington, D.C., Attention: Terry Eby
EPA Region 10, Emergency Response Unit, Attention: Chris Field
EPA Washington Operations Office, Attention: Thomas Eaton
Puyallup Tribe of Indians, Tacoma, Attention: Joe Edgell
Washington State Department of Ecology, Attention: Jim Sachet
City of Tacoma Public Works Department, Attention: Michael Kennedy
EPA Region 10 Web page, Attention: Beth Kunz

EPA Region 10, Emergency Response Unit, Attention: OSCs

VII Status

Case Final