



United States Environmental Protection Agency  
Region 10 Emergency Response Unit  
**POLLUTION REPORT**

**I. HEADING**

Date: May 1, 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. 20 (Progress)**

**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/region10/, 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 4-B), and a processing area where the distillation of solvent, oil, and antifreeze used to occur.

## **IV. Response Information**

### **A. Situation**

#### **1. Current Situation**

Note: See new web page URL on bottom of Background Section

April 24, 2000 (Monday)

Personnel on site: 6 START, 11 ERRS, 2 USCG, 1 USEPA

Weather : Sunny, temps in the mid-30's to high 50's F.

All site personnel attended daily safety meeting and discussed site safety and planned activities. START provided continuous air monitoring during tank transferring operations, (air monitoring data was below the onsite action level), continued drum inventory, provided technical assistance and documentation during haz-cattling, updated the weekly Pollution Report for the week ending April 21 (No. 19), and compiled and reviewed tank farm 3 analytical data. ERRS continued to consolidate and solidify glycol sludge drums, organizing drum documentation, collected profile samples from tanks T-3, 4, and 5 for Prime Environmental (disposal contractor/bidder), continued hazard categorization of drum samples, started to service vac-truck (scheduled maintenance) and continued with the water treatment

system.

April 25, 2000 (Tuesday)

Personnel on site: 4 START, 11 ERRS, 2 USCG, 1 USEPA

Weather: Scattered showers, windy, temperatures ranging from 40's to low-60's F.

All site personnel attended daily safety meeting and discussed site safety and planned activities. START continued reviewing and consolidating analytical results from tank farm 3 and 4, conducted routine air monitoring across the site and specific monitoring during pumping activities continued throughout the day (air monitoring data was below the onsite action level), continued documentation of haz-cat data and prepared for air sampling event. ERRS continued consolidating and solidifying glycol sludge drums, organizing drum documentation, continued collection of profile samples from tank-3, -4, and -5 for Prime Environmental, finished servicing the vac-truck, and continued with the water treatment system. Emerald onsite to clean the JD Excavator.

April 26, 2000 (Wednesday)

Personnel on site: 4 START, 11 ERRS, 2 USCG

Weather: Partially sunny, temperatures ranged from 40's to the lower 60's F.

All site personnel attended daily safety meeting and discussed site safety and planned activities. START continued reviewing and consolidating analytical results from tank farm 3 and 4, conducted routine air monitoring across the site and specific monitoring during pumping activities continued throughout the day (air monitoring data was below the onsite action level), continued documentation of haz-cat data and prepared for air sampling event. Also, START conducted an air sampling event. ERRS continued consolidating and solidifying glycol sludge drums, organizing drum documentation, starting cleaning Emerald Services- air scrubber, started pumping liquid from Baker Tank7 T-6 into the water treatment system, cleaned the vac-truck, and continued with the water treatment system. Emerald removed the JD Excavator and fork lift from the site.

April 27, 2000 (Thursday)

Personnel on site: 4 START, 11 ERRS, 2 USCG

Weather: Partially sunny, light winds, temperatures ranged from 40's to the lower 60's F.

All site personnel attended daily safety meeting and discussed site safety and planned activities. START conducted air sampling event, and conducted air monitoring activities throughout the day, while continuing to consolidate the analytical database for tank farms 3 & 4, waste water treatment plant and other miscellaneous vessels. ERRS and START personnel worked together further consolidating the Hazcat database. ERRS consolidated drums in Building 5, continued organizing drum documentation, finished cleaning Emerald-s air scrubber, transferred gas cylinders to BOC, opened lab pack containers, and continued operation of the water treatment

system.

#### April 28, 2000 (Friday)

Personnel on site: 6 START, 11 ERRS, 2 USCG, 1 USEPA

Weather: Partially sunny, light winds, intermittent light rain, temperatures ranged from 40's to the lower 60's F.

All site personnel attended daily safety meeting and discussed site safety and planned activities. START continued compilation of databases included Tank Farms 3 & 4 analyses, miscellaneous tank and vessel analyses, and air monitoring database. START continued ambient air monitoring throughout the site, setup for flashpoint analyses, and conducted flashpoints on Tank farms 1 & 2 oil phases. START and ERRS personnel continued working together on the Hazcat database. ERRS continued to consolidate drums in building 5, continued organizing drum documentation, commenced pumping oil sludges in to drop boxes, opened lab pack containers, and continued operation of the water treatment system.

## **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 State (Washington Department of Ecology) and the City (City of Tacoma Public Works) continue to provide assistance with discharge of treated contact water.

Drums -

Oil Filter Drums: This phase of the project is completed.

RCRA Drums: Finished segregation and inventory of all non oil filter drums known to be located on the site (formerly referred to as RCRA drums). Selected generators have removed a total of 570 drums and 12 totes of waste. Remaining drums undergoing segregation and bulking with similar waste streams prior to disposal. Approximately 700 empty RCRA drums were removed from the site by Emerald Services.

Oil Drums: Continued sampling and collecting data for the oil drums located in the southern portion of Building #5 and performing Hazard Categorization tests on these samples. The material from 116 of these drums and 4 totes was pumped into a 6,000 gallon storage tank to reduce disposal costs. This material has been disposed under contract with Emerald Petroleum Services along with liquids from Tank 1.

Antifreeze Drums: Antifreeze from 65 drums was pumped into Baker Tank7 #18

and removed by Emerald Services. All identified drums of antifreeze (108) have been inventoried and staged north of BT #18 for bulking prior to disposal.

Solvent Drums: 661 drums of spent solvent (12,000 gallons) have been identified, inventoried, pumped into Baker Tank #9 for bulking prior to disposal. Approximately 10,000 gallons have been disposed of under contract with Safety Kleen.

Glycol Drums: 5,500 gallons of glycol have been bulked prior to disposal. Disposal facility to be determined.

**Baker Tanks** - To date 319,708 gallons of stormwater have been hauled off-site by Emerald Services for disposal. Treated and discharged 13 batches (approximately 260,000 gallons total) of waste water to the City of Tacoma Sanitary Sewer System. Baker Tanks are decontaminated and returned to the vendor after they are emptied.

**Surface Water** - This week, continued treating contact surface water and decontamination water with the temporary waste water treatment system.

**ASTs** - To date all of the ASTs on site have been sampled (T-1 through T- 35). The contents in Tank Farm 1 tanks have been characterized. To date 394,509 gallons have been removed from T-1, 359,509 gallons of which have been disposed of off site. The remaining 35,000 gallons are stored on site in Baker Tanks. A disposal contractor for Tanks 3, 4, and 5 will be selected. The contents of Tank Farm 2 tanks are in the process of being characterized. Materials in the remaining tanks will be characterized when the laboratory data is available.

10,371 gallons of waste water from tank T-30 have been disposed under contract with Emerald Petroleum Services. Water from tank T-33 was treated with temporary onsite water treatment system.

**Soil** - No work was performed this week regarding site soils. To date, 14 soil samples were collected during the assessment phase to characterize site soils.

### **3.Enforcement**

The Region currently has some information regarding potential responsible parties (PRPs) at the site. EPA intends to gather additional PRP information during the removal action.

## **B.Planned Removal Activities**

To minimize/eliminate the threat to human health and the environment posed by the wastes on the site, the following removal activities are planned:

Drums: continued organization of drums and documents (manifests & profile analyses), hazard categorization and disposal tests, bulking and removal of containers from the site.

Baker Tanks7: The decontamination water from some tanks will continue to be treated on site and discharged. Emptied tanks that have no further use on site will be returned to the rental company.

Surface Water: manage surface water as it collects onsite (including sampling, treatment, and discharge), treat AST water that meets the treatment criteria.

ASTs: complete disposal of the liquid phases in Tank T-1. For the liquids in Tanks 3, 4, and 5: disposal contract(s) established, and disposal to commence. Further characterize for disposal the contents of tanks in TF 2 (tanks T-6 through T-15) and TF 3 (tanks T-18 through T-25). Treatment of Tank 34 water phase after NaOH addition and zinc precipitation activities complete. Evaluation of other (waste water treatment plant etc.) waters after receipt of treated Tank 34 water analyses.

Miscellaneous Containers: Characterization and sampling of approximately 10-20 large (50 to 200 gallon) containers on-site, completed.

## **C.Next Steps**

EPA, ERRS, START, and the USCG Strike Team to continue managing onsite surface water. Continued data management including data for all non-oil filter drums. Continued treatment of Baker Tank7 water, and ship some of it off site. Discharge treated contact and non contact water to the Tacoma Sanitary Sewer, in accordance with the Special Approved Discharge (SAD). Decontaminate Baker Tanks7 as they are emptied and return them to the vendor. Continue characterization and disposal of AST contents. In addition, clean poly Baker Tanks7 and Baker Tanks7, continue taking haz-cat sump samples from buildings, prepare and load PRM drums for Philips to transport, stage miscellaneous drums for labeling and haz-cattng, and pack/re-pack on-site facility files for future transportation to a federal facility and for government documentation.

## **D.Key Issues**

Security: Off Duty City of Tacoma Police continue with site security.

Discharge of non contact waters: Non contact waters being treated on site. Emergency discharges have ceased.

Management of contact water: Contact surface water (that which falls within the secondary containment structures) and non-contact water is being pumped into temporary storage tanks (Baker Tanks7). This water continues to be analyzed and is being treated and discharged. Previously some of it was also being disposed off site. Performing both tasks simultaneously will reduce the length of time required to accomplish this task, reduce the associated costs, such as Baker Tank7 rental fees, and remove the threat of a release. Currently, managing the surface waters with the temporary onsite treatment system is sufficient.

Drum/Container Waste: All 64 of the original generators that were given the opportunity to dispose of their wastes have done so. A total of 582 containers of waste were removed from the site by these generators, saving the EPA disposal costs. Other containers of waste are haz-catted, staged with similar compatible wastes, bulked and disposed as appropriate.

On-site facility files: Approximately seven hundred sixty boxes of old facility files were boxed or re-boxed (as necessary), organized by content and date, labeled, and transported to a secured federal facility for future EPA use and general documentation. A final sweep of any remaining facility documentation has been conducted. These files will be transported to a secured federal facility.

## V. Cost Information

Estimated costs are summarized below

	Established Ceiling	Estimated Costs as of date listed, percent of budget expended
EPA	\$ 150,000	\$50,360 (4/29) 33.57%
START	\$ 350,000	\$243,101 (4/29) 69.46%
ERRS	\$ 2,100,000	\$1,702,747 (4/29) 81.08%
Coast Guard	\$100,000	\$90,827 (4/29) 90.83%
Total (4/21)	\$ 2,700,000	\$2,087,035 77.30%

*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.*

## VI Disposition of Wastes

Waste Stream	Medium	Quantity	Containment-Migration Control	Treatment	
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 Manager Sanitary Landfi

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 Bethlehem Steel for recycling.
Used RCRA Drums	solid waste	164 cu yd	placed liners in reliefs	crushed drums with an excavator to reduce volume	Phillips Services Corp. Delivered to Columbia Ridge Landfill.
Generator Drums	sledges 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	20 cu yd	placed liners in reliefs	consolidated in reliefs	Phillips Services Corp. delivered to Olympic View Sanitary Landfill
Contact Rain Water	liquid	319,708 gal	contained in Baker Tanks7	Emerald Petroleum Services (EPS) water treatment plant	EPS, to City of Tacoma Sanitary Sewer
Contact Rain Water	liquid	123,400 gal	contained in Baker Tanks7	Phillips Services Corp. water treatment plant	Phillips Services Corp. to City of Tacoma Sanitary Sewer
Contact Rain Water	liquid	260,000 gal	contained in Baker Tanks7	treated on site with temporary waste water treatment system	to City of Tacoma Sanitary Sewer
Baker Tanks7	solid	Tank	NA	pressure washed, and wiped down	returned to Vendor (Baker Tanks7, 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
Oil From Drums	liquid	142 drums + 4 totes	6,900 gallon poly tank on site	Transferred from polytank to Baker Tank7 24	to be determined
Antifreeze from Drums	liquid	65 drums	Bulked into Baker Tank7 # 18	transported by Spencer	Delivered to Onyx for recycling
Tank Farm 1 Oily Water	liquid	21,100 gal	Bulked into Baker Tank7 #10	transportation to be determined	to be determined
Tank 1 Layer 1	liquid	73,225 gal	Transferred to Vac Truck	transported by EPS	Delivered to EPS for recycling
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 Tank7 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 Tank7 #9	10,000 gallons transported off site by Safety Kleen	Delivered to Araganite facility in Utah for recycling
Waste Stream	Medium	Quantity	Containment-Migration Control	Treatment	Disposal
Glycol From Drums	liquid	5,000 gal	Bulked into Baker Tank7h #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 Layer 2	liquid	9,789 gal	Transferred to Vac Truck	Transported by Emerald	Delivered to Emerald for recycling

## **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: Julie Hagensen  
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 Pending.