# United States Environmental Protection Agency

**Region 10 Emergency Response Unit**

**POLLUTION REPORT**

## I. HEADING

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| Date: | July 17, 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. 31 (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/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

July 10 ,2000 (Monday)
Personnel on site: 2 START, 11 ERRS, 1 USCG, 1 EPA
Weather: Overcast, cool in AM, sunny, warm, breezy in PM, 60-70 F.
All site personnel attended daily safety meeting and discussed site safety/planned activities. START prepared daily activities log and cost documentation for inclusion in the Polrep, provided technical support for the removal of material from the glycol process area, collected treated water sample (Batch #24) for analysis by Sound Analytical, continued to develop options for capping on site, and continued photo-documentation

and oversight. ERRS continued to clean tanks in TF3, disposed of 10,000 gallons of oily water to Emerald, drained glycol in process area, continued sludge solidification, pressure washed boiler room, pocessed waste water, had sub contractors begin demolition of TF1. USCG continued routine air monitoring throughout the site, (air monitoring data was below the onsite action level along the perimeter), ensured that unauthorized personnel were not allowed on site and that all personnel entering the site were properly checked in with required safety equipment, conducted site safety, conducted air monitoring in tanks 18 and 19 of TF3 prior to entry, relocated personal data rams to account for TF1 demolition, reviewed safety and work plan for TF1 demolition. The results of onsite air monitoring for airborne particulate matter indicated levels above onsite action levels within the cab on the Shear machine. Engineering measures were implemented (doors were closed). Results of air monitoring indicated levels above the action level (5 ppm) in tank 19 so entries into that tank were made in Level B.

July 11, 2000 (Tuesday)

Personnel on site: 2 START, 12 ERRS, 1 USCG, 1 EPA

Weather: Overcast in AM, partly cloudy, breezy in PM, 60 to 70 F

All site personnel attended daily safety meeting and discussed site safety/planned activities. START continued development of surface water management options, finalized soil screening/sampling plan, sent Polrep 30, and continued oversight. ERRS continued cleaning tanks in TF3, finished cleaning T18 in TF3, continued demolition of TF1, pumped 10,000 gallons of oily water to Emerald, processed (crushed) empty drums, continued to process wastewater, cleaned and stopped rent on Baker Tank #6. USCG continued routine air monitoring throughout the site, (air monitoring data was below the onsite action level along the perimeter), ensured that unauthorized personnel were not allowed on site and that all personnel entering the site were properly checked in with required safety equipment, conducted site safety, conducted air monitoring in tanks 19 and 24 of TF3, Baker Tank 6 and the bottom of T4 after shearing, prior to entry. Tank 19 and Baker Tank 6 exceeded the action levels and Level B was used. The results of onsite air monitoring for airborne particulate matter indicated levels above onsite action levels within the cab on the Shear machine. Engineering measures were implemented (doors were closed).

July 12, 2000 (Wednesday)

Personnel on site: 2 START, 12 ERRS, 1 USCG, 1 EPA

Weather: partly cloudy in AM, clear, breezy in PM 60-75F

All site personnel attended daily safety meeting and discussed site safety/planned activities. START contacted the City of Tacoma and discussed storm water management concerns, escorted EPS

representative for inspection of trucks and trailers remaining on site, prepared discharge request for treated water and submitted to the City of Tacoma, continued development of surface water management options, and continued oversight and photo-documentation. ERRS continued demolition of TF1, continued to drain oil, solvent and glycol from process area, continued to treat water, pressure washed TF3 containment area, removed product from the black poly tank, continued processing empty drums, processed empty poly drums, continued product removal and decon of various outlying vessels. USCG continued routine air monitoring throughout the site, (air monitoring data was below the onsite action level along the perimeter), ensured that unauthorized personnel were not allowed on site and that all personnel entering the site were properly checked in with required safety equipment, conducted site safety, conducted air monitoring in T1 and T5, both were above action levels and Level B was used. The results of onsite air monitoring for airborne particulate matter indicated levels above onsite action levels within the cab on the Shear machine. Engineering measures were implemented (doors were closed).

July 13, 2000 (Thursday)
Personnel on site: 2 START, 11 ERRS, 2 USCG, 0 EPA
Weather: partly cloudy, windy, 70's
All site personnel attended daily safety meeting and discussed site safety/planned activities. START continued oversight of AST demo, conducted site walk with City of Tacoma SUOD representative examining on site sewer line conditions, and resubmitted discharge request to the city of Tacoma after pH had been adjusted. ERRS continued demolition of TF1, continue to drain solvent and oil from process area pumped A-fuel into Baker Tank, continued to treat water, pressure washed TF2 containment area, decon black poly tank, continued product removal and decon of various outlying vessels, removed three roll-offs of crushed drums and 1/4 truck load of empty drums for recycle. USCG continued routine air monitoring throughout the site, (air monitoring data was below the onsite action level along the perimeter), ensured that unauthorized personnel were not allowed on site and that all personnel entering the site were properly checked in with required safety equipment, monitored activities of Emerald employees while onsite to remove tanker vehicles, acted as safety spotter for metal scraping operations, conducted site safety, conducted air monitoring of sludges in T1 after top and sides were removed. Results were below action levels. The results of onsite air monitoring for airborne particulate matter indicated levels above onsite action levels downwind of the scrap loading activities. Engineering measures were implemented (dust supression with water). Emerald removed one CleanCare tanker truck.

July 14, 2000 (Friday)
Personnel on site: 2 START, 10 ERRS, 1 USCG, 1 EPA
Weather: partly cloudy, 60-70's
All site personnel attended daily safety meeting and discussed site safety/planned activities. START conducted site walk with a representative from Pacific Industrial Resources regarding storm sewer decontamination, reviewed waste oil process system for disposal, continue development of cap and surface water options, and prepare for Geoprobe/Soil Screening event. ERRS conducted the final clean up of TF1 demolition, started removing sludge from T27, pumped oil from the process area, treated wastewater, discharged 20,000 gallons of treated wastewater, demobed black poly tank back to Baker, continued to decon various vessels in the out-lying area. USCG continued routine air monitoring throughout the site, (air monitoring data was below the onsite action level along the perimeter), ensured that unauthorized personnel were not allowed on site and that all personnel entering the site were properly checked in with required safety equipment, conducted site safety, and conducted air monitoring for black poly drum. Emerald removed one CleanCare package truck.

July 15, 2000 (Saturday)
Personnel on site: 1 START, 6 ERRS, 1 USCG, 0 EPA
Weather: clear, calm in AM, clear, breezy, 70's in PM
All site personnel attended daily safety meeting and discussed site safety/planned activities. START conducted oversight and gave technical support for the draining of the waste oil process system and oversaw the sight preparation of the three areas to be capped on site. ERRS attempted to clean sludge from T27, cleaned the light end material out of the process area tanks and piping. USCG continued routine air monitoring throughout the site, (air monitoring data was below the onsite action level along the perimeter), ensured that unauthorized personnel were not allowed on site and that all personnel entering the site were properly checked in with required safety equipment, conducted site safety, and monitored removal activities in the process area. Emerald removed one CleanCare tanker truck and three CleanCare package trucks.

**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) continues to provide assistance with discharge of treated waste water.

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 1050 empty RCRA drums were removed from the site by Emerald Services.

Oil Sludge Drums: Sludges from miscellaneous drums are being bulked and solidified on site and then transferred by Waste Management to Arlington Landfill.

Antifreeze Drums: Bulked with material from Tank 25 and transported from site by Ecco to Kennewick for recycling.

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

RCRA Debris: Drums and debris are being solidified and disposed under contract with Philip Services.

Baker Tanks® - A total of 10 Baker Tanks are currently on site. Baker Tanks are being used to stock bulked materials, store treatment system waters, and store material from tank farms prior to disposal. One Baaker tank was removed from EPA's rental but two Baker Tanks were brought on site for temporary storage of materials from TF4.

Surface Water - Continued treating site surface water and decontamination water with the temporary waste water treatment system. Treated and discharged of 22 batches to date (approximately 440,000 gallons total) of waste water to the City of Tacoma Sanitary Sewer System. Two batches (approximately 40,000 gallons) did not meet the pretreatment requirements established by the city and were disposed off site.

ASTs -All tanks in TF1 (T1, T3, T4, T5) have been demolished and the scrap steel trucked to Snitzer Steel according to the ERRS sub contract . All tanks in Tank Farms 2 & 3 are empty of fluids, having been removed and transported by Emerald Services, Solpro, Prime Environmental, Chemical Waste Management (specifics tabulated in section VI). Tank sludges are in the process of being solidified and subsequently transported by Chemical Waste Management to Arlington landfill for final disposition. The oil and sludge from Tank 33 were solidified with other

project oil sludges. Tank 34 water has been treated and disposed to the City of Tacoma Sanitary Sewer. Tank Farm 3 material was transported by Emerald (oily water) and Prime (dry oil). Tank Farm 4 material is being hauled by Onyx for disposal in Utah.

Soil - An evaluation of soil treatment/disposal options is under review. To date, 14 soil samples were collected during the assessment phase to characterize site soils. Investigated screening and soil sampling options.

**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. 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 analysis), hazard categorization and disposal tests, bulking and removal of containers from the site.

Baker Tanks®: 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: management of surface water as it collects onsite (including sampling, treatment, and discharge), and treatment of AST water that meets the treatment criteria.

ASTs: Continue removal activities of material from Tank Farm 4.

Miscellaneous Containers: All material from miscellaneous vessels has been bulked in appropriate waste streams for disposal. Vessels have been staged on-site away from work areas.

## C. Next Steps

EPA, ERRS, START, and the USCG Strike Team will continue managing onsite surface water. Continued data management including data for all remaining drums as well as analytical data for materials stored in the ASTs. Continued treatment and discharge of contact and non-contact surface water. Transfer material from Tank Farms 4 for disposal off site. Continue to solidify sludges for disposal at Arlington Landfill. Continue to bulk material in Baker Tanks® and decontaminate tanks after material is disposed of, prepare and load PRM drums for Philips to transport. Prepare for geoprobe activities. Prepare for the construction of a cap and the development of surface water management plan. Prepare for demobilization from site on July 31, 2000.

## D. Key Issues

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

Management of site surface water: Contact surface water (that which falls within the secondary containment structures) and non-contact water has been either treated on site or disposed off site. On site water treatment is performed in 20,000 gallon batches. Each batch is sampled, laboratory results are submitted to the City of Tacoma, and, with the City's approval, each batch is discharged to the Sanitary Sewer System. Previously, some surface water was also disposed off site. Performing both tasks simultaneously reduced the length of time required to accomplish this task, reduced the associated costs, such as Baker Tank® rental fees, and removed the threat of a release. Currently, managing the surface waters with the temporary on site 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 eight hundred boxes of facility files and documents were transported to a secured federal facility.

## I. Cost Information

Estimated costs are summarized below:

| | Established | Estimated Costs |
|---|---|---|

| | Ceiling | as of date listed,<br>percent of budget expended |
|---|---|---|
| EPA | $ 300,000 | $ 160,583 (7/16)<br>53.53% |
| START | $ 676,500 | $ 531.034 (7/16)<br>78.57% |
| ERRS | $ 3,000,000 | $ 2,703,357 (7/13)<br>90.11% |
| Coast Guard | $ 100,000 | $ 117,340 (7/15)<br>117.34% |
| Total | $ 4,076,500 | $ 3,512,314<br>86.16% |

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 | 20 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 | 23 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 | 24.1 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 |

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| 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 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 |
| 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 |

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| 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 |

## 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 Pending