# United States Environmental Protection Agency

**Region 10 Emergency Response Unit**

**POLLUTION REPORT**

## I. HEADING

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|---|---|
| Date: | August 7, 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. 34 (Progress)**

## II. BACKGROUND

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|---|---|
| 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 31, 2000 (Monday)
Personnel on site: 2 START, 9 ERRS, 1 EPA
Weather: Sunny, high of 75-80 F.
All site personnel attended daily safety meeting and discussed site safety/planned activities. START developed data summary for soil screening activities conducted on site and prepared Polrep for distribution.
ERRS shipped 27,850 gallons of oily water to Philip Services for disposal, shipped 20 cubic yards of oily debris and 20 cubic yards of oily

sludge to Columbia Ridge Landfill, shipped 4,044 gallons of solvent paint sludge to Prime for disposal, shipped one lab-pack of water reactives and one lab-pack of sodium nitrites for disposal, and continued sludge solidification.

August 1, 2000 (Tuesday)

Personnel on site: 2 START, 9 ERRS

Weather: Overcast in AM, partly cloudy, breezy in PM, 65 to 80 F

All site personnel attended daily safety meeting and discussed site safety/planned activities. START complete soil screening data summary, conducted site walk with City of Tacoma SOUD representative regarding sewer cleaning and sewer camera activities, prepared for final air sampling event, continued development of pollution reports and demobilized equipment and PPE no longer required on site. ERRS shipped 26,174 gallons of oily water and 2,690 gallons of waste antifreeze to Philip Services for disposal, shipped 20 cubic yards of oily debris for disposal at Columbia Ridge Landfill, decontaminated Tank Farm #4 containment, cleaned water treatment system Baker Tanks, and continued sludge solidification.

August 2, 2000 (Wednesday)

Personnel on site: 2 START, 9 ERRS, 1 EPA

Weather: overcast in the morning then clear and 70-80 F

All site personnel attended daily safety meeting and discussed site safety/planned activities. START conducted site walk with representatives from paving company regarding cap construction, developed surface water management plan and continued to demobilize equipment. ERRS shipped 59 drums of paint waste for disposal, continued decontamination of Tank Farm 4 containment, continued sludge solidification, prepared water treatment equipment for transport, demobilized waste water treatment Baker Tanks, and began to decontaminate Baker Tank #9.

August 3, 2000 (Thursday)

Personnel on site: 1 START, 9 ERRS

Weather: partly cloudy in AM, clear, breezy in PM, 70-80F

All site personnel attended daily safety meeting and discussed site safety/planned activities. START continued to develop surface water management plan and continued oversight and photo-documentation of site activities. ERRS continued to remove sludge from tanks in Tank Farm #4, deconned Tank Farm #4 containment area, continued cleaning Baker Tank #9, completed decontamination of Baker Tanks 21 and 22, and continued sludge solidification.

August 4, 2000 (Friday)

Personnel on site: 2 START, ERRS, 1 EPA
Weather: clear skies, 70-80 F
All site personnel attended daily safety meeting and discussed site safety/planned activities. START worked on surface water management plan, marked containment areas to be breeched for surface water management, developed project completion check list and continued to demobilize nonessential equipment. ERRS continued removing sludge from Tank Farm #4, continue sludge solidification, began decontamination of Baker Tank #18, prepare office trailers for demobilization, demobilized Baker Tank #9, shipped 20 cubic yards of sludge to Waste Management, and shipped approximately 20,000 gallons of oil/glycol to Emerald.

**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) are providing assistance with the establishment of an interim storm water management plan. For free the City of Tacoma is providing a crew and camera to inspect the underground piping on site.

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 have been 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 2 Baker Tanks are currently on site. Baker Tanks have been used to stock bulked materials, store treatment system waters, and store material from tank farms prior to disposal. Five Baker tanks were removed from EPA's rental.

Surface Water - Treated and discharged 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. The temporary system has been dismantled, any water developed on site will be disposed off site. Currently, a surface water management plan is under development for period after demobilization from site.

ASTs -All tanks in TF1 (T1, T3, T4, T5) have been demolished and the scrap steel trucked to Schnitzer Steel under subcontract to the ERRS. 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 have been solidified and subsequently transported by Chemical Waste Management to Arlington landfill for final disposition. Tank Farm 3 material was transported by Emerald (oily water) and Prime (dry oil). Tank Farm 4 material has been hauled by Onyx for disposal in Utah.

Soil - Soil treatment/disposal options have been reviewed. Fourteen soil samples were collected during the assessment phase to characterize site soils. One hundred soil samples have been collected from three areas on site (Area 1 - within the secondary containment of Tank Farm 1, Area 2 - south of Building 1, and Area 3 - South of Tank Farm 2). Field screening for Diesel range Total Petroleum Hydrocarbons (TPHD) was performed on these samples. A total of 15 samples have been submitted for laboratory analysis: five samples for full suite analysis, and ten for TPHD analysis.

**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: Approximately 70 drums containing waste remain onsite. They will be transported from site during the following week.

Baker Tanks®: Complete the decontamination and removal of Baker Tanks from the site. The decontamination water from the remaining tanks will be disposed off site.

Surface Water: Awaiting bid responses for construction of asphaltic cap. Construction will begin as soon as contractor can mobilize to site. A surface water management plan will be implemented including the construction of an above ground water transfer system.

ASTs: Inspect ASTs and perform final cleaning activities as needed.

Miscellaneous Debris: A final inspection of site will be conducted miscellaneous debris will be disposed of as needed.

## C. Next Steps

Development and implementation of a surface water management system for the interim between the EPA removal activity and sale of the property. Continued data management including data for soil screening samples and laboratory samples. Complete solidification of sludges for disposal at Arlington Landfill. Decontaminate Baker Tanks®and return to vendor after material is disposed of. Complete disposal of drumed wastes. Receive, interpret and report laboratory data for subsurface soil samples. Prepare for the construction of a cap and implement a surface water management plan. Prepare for demobilization from site on August 11, 2000.

## D. Key Issues

Security: Off Duty City of Tacoma Police continue with site security. Security will remain until all wastes have been removed from the site.

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. The temporary water treatment system has been dismantled and any

surface water that collects on site will be disposed offsite until a surface water management system is implemented. The system will include the construction of an asphaltic cap over three areas onsite and the construction of an above-ground water transfer system. Surface water will be disposed to the city storm water line located at the south end of the property.

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. Approximately 70 drums of waste remain on site, they will be transported from site during the following week.

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 Ceiling | Estimated Costs as of date listed, percent of budget expended |
|---|---|---|
| EPA | $ 300,000 | $ 164,440 (8/4) 54.8% |
| START | $ 676,500 | $ 564,200 (8/4) 83.4% |
| ERRS | $ 3,000,000 | $ 2,927,271 (8/4) 97.6% |
| Coast Guard | $ 100,000 | $ 123,800 (8/4) 123.8% |
| Total | $ 4,076,500 | $ 3,733,500 (8/4) 92.7% |

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 | 31 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 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 |

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| 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 | 140 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 | 40 cubic yards | loaded onto truck | Transported by Waste Management | Delivered to Waste Management 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 |

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| Oily Water | Liquid | 50,024 gallons | Transferred to Vac Truck | Transported by Philips | Delivered for disposal at Kent facility |
| 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 Pending