

# ADEM



## ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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DIRECTOR

September 30, 1997

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GOVERNOR

### MEMORANDUM

**TO:** Wm. Gerald Hardy, Chief *WGH 10/1/97*  
Hazardous Waste Branch  
Land Division

**THROUGH:** Stephen A. Cobb, Chief *CAE 9/30/97*  
Industrial Facilities Section  
Hazardous Waste Branch  
Land Division

**FROM:** Scott Story *SSS 9/11/97*  
Industrial Facilities Section  
Hazardous Waste Branch  
Land Division

**RE:** Evaluation of status under the  
RCRIS Corrective Action Environmental Indicator Event Codes  
Diversified Products Corporation  
EPA ID No. ALD 003 301 884

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The Hazardous Waste Branch has conducted an evaluation of the Diversified Products Company (DP), Opelika, Alabama, facility in relation to the following RCRIS Corrective Action Codes:

- 1) Human Exposures Controlled Determination (CA725)
- 2) Groundwater Releases Controlled Determination (CA750)

The applicability of these event codes adheres to the definitions and guidance provided by the EPA Office of Solid Waste (OSW) in the July 29, 1994, memorandum to the Regional Waste Management Division Directors.

Region 4 has also added a regional status code to CA725 and CA750, which tracks initial evaluations in which a determination is made that plausible human exposure to current contamination risks and groundwater releases are not controlled. This regional status code is listed as "NO, not applicable as of this date." Use of the regional status code is only applicable during the first evaluation. Evaluations subsequent to the first evaluation will use the national status codes to explain the current status of exposure controls.



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### Background

Diversified Products Company, which began operations in 1963, is a manufacturing facility that produces bicycles and physical fitness equipment. In 1994, Roadmaster Industries Inc. acquired Diversified Products, but did not acquire all of the real assets of DP. Following the acquisition, a wholly owned operating subsidiary of Roadmaster Industries, Inc. namely Roadmaster Corporation, took over the manufacturing operations of DP. Roadmaster Corporation currently leases the facility from DP.

Processes utilized in the production of the bicycles and fitness equipment include metal fabrication (sawing, cutting, punching, and welding), coating (powder coating and minor touch-up spray), and paint stripping (caustic dip tanks). Ancillary processes include wastewater treatment, raw material storage, temporary waste storage and packaging. In the past, spray coating, chromium plating, nickel plating, zinc plating, plastic blow molding, plastic injection molding, pressure filling of plastic barbell shells with Orbatron (a cement, sand, mill scale, and calcium nitrite mixture), foam pad production, and upholstery application have occurred at the facility.

Diversified Products previously operated two process units, which either generated or treated hazardous wastes. These process units comprised a metals plating shop, which applied chromium, nickel, or zinc coatings to steel components used in the fabrication of products and a heat recovery incinerator designed to recover energy from used paint, lacquer, and thinners. A groundwater quality assessment plan was completed in 1991, which outlined the latest monitoring well installation, sampling, collection, and hydrogeologic data collection procedures, which were implemented at the site. A post-closure permit application for the former chrome plating tank area was applied for in July 1995.

A RCRA Facility Assessment (RFA) was completed August 1997. The RFA identified 46 Solid Waste Management Units (SWMUs) and one Area of Concern (AOC). Nineteen SWMUs and one AOC were identified as requiring confirmatory sampling or integrity testing. One SWMU, the chrome plating waste tank area, required further information in the form of a RCRA Facility Investigation Workplan (RFI). Currently, the facility is in the initial phase of gathering information for this RFI Workplan.

### Human Exposures Controlled Determination (CA725)

The routes of human exposure at the Diversified Products facility include soil, groundwater, and surface water through stormwater and process wastewater discharge. Surface water discharges are controlled and regulated by the NPDES program. Exposures to groundwater could occur by direct access to the aquifer through monitoring wells or private water wells. All monitoring wells maintained by DP are required to be locked at all times except when being sampled. Constituents of concern in the groundwater are heavy metals and volatile organic solvents believed to have originated from the chrome tank storage area. The contaminant plume appears to be located entirely on the facility property.

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The chrome tank storage area is generally believed to be the source of the contamination detected in the groundwater. Soil had been impacted from the contamination, which had migrated to the underlying aquifer. In 1990, the chrome tank and surrounding soil were excavated, and the contaminated soil was properly disposed of off-site. Soil samples taken in later sampling events determined elevated levels of metals and organic contamination still present at the site. The Human Exposure Controlled RCRIS code applies to the entire site, not specific SWMUs. The available status codes are:

- 1) YE Yes, applicable as of this date (indicating human exposures controlled).
- 2) NO No, not applicable as of this date (indicating human exposures uncontrolled).
- 3) NA Previous determination no longer applicable as of this date.
- 4) NC No control measures necessary.

Therefore, due to the presence of hazardous waste constituents in the groundwater and the contaminated soil on-site, human exposures are uncontrolled at this time.

### **Groundwater Releases Controlled Determination (CA750)**

A groundwater quality assessment was completed at Diversified Products in 1991. The assessment documents the existence of a migratory contaminant plume associated with the release of hazardous constituents in the chrome tank area. Certain hazardous constituents were present in the groundwater at concentrations above regulatory limits (barium, benzene, 1,1-dichloroethene, and 1,2-dichloroethene). Several other metals and organics were detected in the groundwater, but at levels less than applicable regulatory concentrations. The Groundwater Releases Controlled RCRIS code applies to the entire site, not specific SWMUs. The available status codes are:

- 1) YE Yes, applicable as of this date (indicating groundwater releases controlled).
- 2) NO No, not applicable as of this date (indicating groundwater releases uncontrolled).
- 3) NA Previous determination no longer applicable as of this date.
- 4) NR No releases to groundwater.

Although a Groundwater Monitoring Program has been implemented, an approved corrective action system has not been completed. Therefore, groundwater releases are uncontrolled at this time.

### **CONCLUSIONS**

#### **1) Human Exposures Controlled RCRIS Event Code (CA725)**

Given the fact that soil and groundwater contamination is known to exist at the facility and there are no corrective measures currently in-place, it would appear that the appropriate status code for RCRIS code CA725 would be NO (not applicable at this date), indicating human exposures uncontrolled at this time.

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**2) Groundwater Releases Controlled Determination (CA750)**

Although there is a Groundwater Monitoring Plan implemented, there are no corrective measures currently in place at the Diversified Products facility. Therefore, it appears that groundwater releases are uncontrolled at this time and NO (not applicable as of this date) is the appropriate status code for RCRIS code CA750.

SS/sem:L:DP-envind

File: Diversified Products/Lee County/TSD