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MEMORANDUM

April 7, 2000

To: Stephen A. Cobb, Chief
Hazardous Waste Branch
Land Division

Through: Heather Deese
Industrial Facilities Section
Hazardous Waste Branch
Land Division

From: Chip Crockett
Industrial Facilities Section
Hazardous Waste Branch
Land Division

RE: **Environmental Indicator (EI) Codes**
Fisher Industrial Services (ALD 981 020 894)
M&M Chemical Company (ALD 070 513 767)
Safety-Kleen Corp. – Gurley facility (ALD 000 776 807)

This memorandum documents a change in the RCRIS EI status codes for CA725 (Human Exposures Controlled determination) and CA750 (Groundwater Releases Controlled determination) for the above referenced facilities. Previously, these facilities carried the NC ('No Contamination') and NR ('No Release') status codes. Due to changes in the EI code system, these codes no longer exist. The equivalent status code under the current code system is YE (yes) for both CA725 and CA750 for each of the above referenced facilities.

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File: Hazardous Waste/Correspondence/ Fisher Industrial Services (ALD 981 020 894)
Hazardous Waste/Correspondence/M&M Chemical Company (ALD 010 513 767)
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MEMORANDUM

June 22, 1998

To: Wm. Gerald Hardy, Chief
Hazardous Waste Branch
Land Division

Through: Stephen A. Cobb, Chief
Industrial Facilities Section
Hazardous Waste Branch
Land Division

From: Chip Crockett
Industrial Facilities Section
Hazardous Waste Branch
Land Division

Subject: Evaluation of Status Under the RCRIS Corrective Action Environmental Indicator Event Codes (CA725 and CA750)
Fisher Industrial Service, Glencoe, Alabama
EPA ID Number: ALD 981 020 894

I. PURPOSE OF MEMO

This memo is written to formalize an evaluation of Fisher Industrial Service's status in relation to the following corrective action event codes defined in the Resource Conservation and Recovery Information System (RCRIS):

1) Human Exposures Controlled Determination (CA725),

2) Groundwater Releases Controlled Determination (CA750).

The application of these event codes at Fisher adheres to the event code definitions found in the Data Element Dictionary for RCRIS.

Concurrence by the Hazardous Waste Branch Chief is required prior to entering these event codes into RCRIS. Your concurrence with the interpretations provided in the following paragraphs and the subsequent recommendations is satisfied by dating and signing above.

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II. HUMAN EXPOSURES CONTROLLED DETERMINATION (CA725)

There are five (5) national status codes under CA725. These status codes are:

1) YE Yes, applicable as of this date.

2) NA Previous determination no longer applicable as of this date.

3) NC No control measures necessary.

4) NO Facility does not meet definition.

5) IN More information needed.

The first three (3) status codes listed above were defined in January 1995 Data Element Dictionary for RCRIS. The last two (2) status codes were defined in June 1997 Data Element Dictionary.

Note that CA725 is designed to measure human exposures over the entire facility (i.e., the code does not track SWMU specific actions or success). Every area at the facility must meet the definition before a YE or NC status code can be entered for CA725. The NO status code should be entered if there are current unacceptable risks to humans due to releases of hazardous wastes or hazardous constituents from any SWMU(s) or AOC(s). The IN status code is designed to cover those cases where insufficient information is available to make an informed decision on whether or not human exposures are controlled. If an evaluation determines that there are both unacceptable and uncontrolled current risks to humans at the facility (NO) along with insufficient information on contamination or exposures at the facility (IN), then the priority for the EI recommendation is the NO status code.

In EPA Region 4's opinion, the previous relevance of NA as a meaningful status code is eliminated by the June 1997 Data Element Dictionary's inclusion of NO and IN to the existing YE and NC status codes. In other words, YE, NC, NO and IN cover all of the scenarios possible in an evaluation or reevaluation of a facility for CA725. Therefore, it is Region 4's opinion that only YE, NC, NO and IN should be utilized to categorize a facility for CA725. No facility in Region 4 should carry a NA status code.

This particular CA725 evaluation is the first evaluation performed by ADEM for Fisher. Because assumptions have to be made as to whether or not human exposures to current media contamination are plausible and, if plausible, whether or not controls are in place to address these plausible exposures, this memo first examines each environmental media (i.e., soil, groundwater, surface water, air) at the entire facility including any offsite contamination emanating from the facility rather than from individual areas or releases. After this independent media by media examination is presented, a final recommendation is offered as to the proper CA725 status code for Fisher.

The following discussions, interpretations and conclusions on contamination and exposures at the facility are based on the following reference documents:

- Environmental Priorities Initiative Preliminary Assessment of Fisher Industrial Service (RFA), August 9, 1990
- RCRA Facility Investigation Workplan, January 30, 1998
- RCRA Facility Investigation Report, April 18, 1998

III. FACILITY SUMMARY

Fisher is a facility permitted for the storage and treatment of hazardous wastes. Fisher accepts primarily high BTU wastes from various industries for subsequent blending into fuels which are shipped offsite for incineration. The facility also accepts non-fuel blending wastes for brokerage to an off-site disposal facility.

The RFA for this facility identified five SWMUs requiring additional investigations. An approved RCRA Facility Investigation (RFI) was conducted by FIS in March, 1998. The focus of the RFI was the sampling of the soils surrounding those SWMUs identified as having moderate to high potential for release. Because the stormwater runoff and facility drainage is routed to one collection point, the soils at this area were also sampled. The results of this investigation are presented in the RFI Report, dated April 18, 1998.

IV. MEDIA BY MEDIA DISCUSSION OF CONTAMINATION AND THE STATUS OF PLAUSIBLE HUMAN EXPOSURES

Based on data contained in the documents referenced in Section II, the following conclusions are reached:

Soil at the facility is not contaminated at this time. Because there is no contamination, there are no plausible human exposures which must be controlled due to contaminated soil.

The groundwater is reasonably expected not to be contaminated at this time. Because contamination is not reasonably expected to have occurred, there are no plausible human exposures which must be controlled due to contaminated groundwater.

Surface water associated with the facility is reasonably expected not to be contaminated at this time. Because contamination is not reasonably expected to have occurred, there are no plausible human exposures which must be controlled due to contaminated surface water.

Releases to air from soil, groundwater and/or surface water contaminated by SWMUs and/or AOCs at the facility is not known to be occurring at concentrations above relevant action levels. Therefore, there is no human exposure to contamination via an air route.

V. STATUS CODE RECOMMENDATION FOR CA725:

Based on the preceding media by media evaluation, there is no observed contamination present at Fisher. Because there is no risk of human exposure to contaminant releases at the facility due to low/nonexistent contaminant levels (i.e., less than action levels), it is recommended that CA725 NC be entered into RCRIS.

VI. GROUNDWATER RELEASES CONTROLLED DETERMINATION (CA750)

There are five (5) status codes listed under CA750:

1) YE Yes, applicable as of this date.

2) NA Previous determination no longer applicable as of this date.

3) NR No releases to groundwater.

4) NO Facility does not meet definition.

The first three (3) status codes listed above were defined in January 1995 Data Element Dictionary for RCRIS. The last two (2) status codes were defined in June 1997 Data Element Dictionary.

The status codes for CA750 are designed to measure the adequacy of actively (e.g., pump and treat) or passively (e.g., natural attenuation) controlling the physical movement of groundwater contaminated with hazardous constituents above relevant action levels. The designated boundary (e.g., the facility boundary, a line upgradient of receptors, the leading edge of the plume as defined by levels above action levels or cleanup standards, etc.) is the point where the success or failure of controlling the migration of hazardous constituents is measured for active control systems. Every contaminated area at the facility must be evaluated and found to have the migration of contaminated groundwater controlled before a "YE" status code can be entered.

If contaminated groundwater is not controlled in any area(s) of the facility, the NO status code should be entered. If there is not enough information at certain areas to make an informed decision as to whether groundwater releases are controlled, then the IN status code should be entered. If an evaluation determines that there are both uncontrolled groundwater releases for certain units/areas (NO) and insufficient information at certain units/areas of groundwater contamination (IN), then the priority for the EI recommendation should be the NO status code.

In Region 4's opinion, the previous relevance of NA as a meaningful status code is eliminated by the June 1997 Data Element Dictionary's inclusion of NO and IN to the existing YE and NR status codes. In other words, YE, NR, NO and IN cover all of the scenarios possible in an evaluation or reevaluation of a facility for CA750. Therefore, it is Region 4's opinion that only YE, NR, NO and IN should be utilized to categorize a facility for CA725. No facility in Region 4 should carry a NA status code.

This evaluation for CA750 is the first formal evaluation performed for Fisher. Please note that CA750 is based on the adequate control of all contaminated groundwater at the facility.

The following discussions, interpretations and conclusions on contaminated groundwater at the facility are based on the following reference documents:

- Environmental Priorities Initiative Preliminary Assessment of Fisher Industrial Service (RFA), August 9, 1990
- RCRA Facility Investigation Workplan, January 30, 1998
- RCRA Facility Investigation Report, April 18, 1998

VII. STATUS CODE RECOMMENDATION FOR CA750:

Based on data contained in the documents referenced in Section V, there are no known releases of hazardous constituents to groundwater in excess of relevant action levels at Fisher. Therefore, it is recommended that CA750 NR be entered into RCRIS.

VIII. SUMMARY OF FOLLOW-UP ACTIONS

At this time, no further actions regarding SWMU corrective action are proposed to be taken by the Hazardous Waste Branch for Fisher Industrial Services.

VHC/sem:L:FIS EI memo

File: TSD/Etowah