

US EPA ARCHIVE DOCUMENT



# U.S. EPA Requests Public Comment on Proposed Remedy (Cleanup) for Romic East Palo Alto Facility



September 2007

US EPA ARCHIVE DOCUMENT

FIRST-CLASS MAIL  
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U.S. EPA  
Permit No. G-35

United States Environmental Protection  
Agency, Region 9  
75 Hawthorne Street (SFD-3)  
San Francisco, CA 94105  
Attn: Lauren Berkman  
Official Business  
Penalty for Private Use, \$300  
Address Service Requested

*The U.S. Environmental Protection Agency (U.S. EPA) is requesting comments on a proposed remedy to clean up soil and ground water contamination at the Romic Environmental Technologies Corporation (Romic) facility in East Palo Alto, California. U.S. EPA is the lead agency responsible for cleaning up the soil and ground water contamination. Romic has stopped accepting waste and is closing (see details inside).*

## How to Submit Comments on U.S. EPA's Proposed Remedy Mark Your Calendar - Dates to Remember

### Public Comment Period

**Begins September 17 and ends on November 1, 2007**

Comments may be submitted to U.S. EPA during the public comment period in writing by mail, email, fax or in person at the public meeting/hearing (see below). Written comments must be postmarked, emailed or faxed no later than November 1, 2007. See contact information on page 7.

### Public Meeting and Hearing on Proposed Remedy

U.S. EPA will hold a public meeting and hearing to explain the proposed remedy. Oral and written comments will be accepted at the hearing. The meeting and hearing will be held on Wednesday, October 10, from 6:00 to 9:00 pm at East Palo Alto City Hall located at 2415 University Avenue (First Floor - City Council Chambers and Community Room), East Palo Alto, California.

Spanish translation will be available at the meeting and hearing.

For more information, key documents are located at the following locations:

**East Palo Alto Library**  
2415 University Avenue  
East Palo Alto, CA 94303  
Phone: (650) 321-7712

Monday–Thursday: 10am–8pm  
Friday: 10am–6pm  
Saturday: 10am–5pm

**U.S. EPA RCRA Records Center**  
75 Hawthorne Street, Suite 722  
San Francisco, CA 94105  
Phone: (415) 947- 4596

Monday–Friday: 8am–5pm

## Inside...

### Fact Sheet: U.S. EPA Requests Public Comment on Proposed Remedy For Romic East Palo Alto Facility

U.S. EPA is requesting comment on a proposed remedy to address soil and ground water contamination at the Romic facility in East Palo Alto, California. The proposed remedial technology is enhanced biological treatment.

Versión en Español incluida

## Contact Information

Call the toll-free message line at 800-231-3075, or contact

■ **Ron Leach**  
Project Manager  
U.S. Environmental Protection Agency (WST-5)  
75 Hawthorne St  
San Francisco, CA 94105  
415-972-3362  
leach.ronald@epa.gov

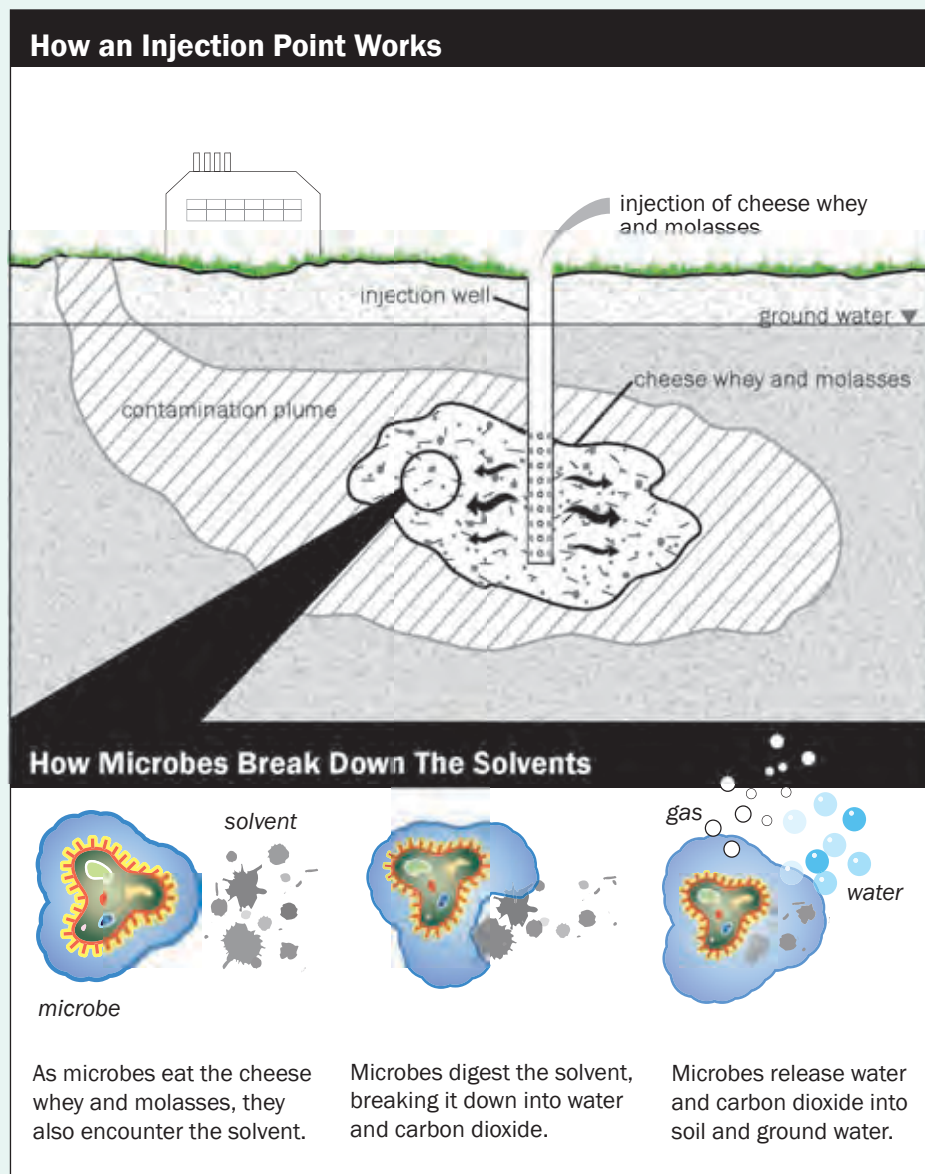
■ **Lauren Berkman**  
Community Involvement Coordinator  
U.S. Environmental Protection Agency (SFD-3)  
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San Francisco, CA 94105  
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## Enhanced Biological Treatment

U.S. EPA proposes enhanced biological treatment as the preferred remedial technology to address soil and ground water contamination at the Romic facility. Enhanced biological treatment uses cheese whey and molasses as a food source for natural microbes that live in the soil and ground water below the Romic facility. These microbes break down the contaminants into carbon dioxide, water and salt. Tests of this technology at the Romic facility have shown as much as a 99% decrease in the amount of contamination.

### How the Enhanced Biological Treatment Works

The biological approach is designed to destroy solvents in place by using natural processes. Cheese whey and molasses are injected into the groundwater contaminated with solvents. The cheese whey and molasses act as food for the natural microbes that live in the soil. These microbes are helpful and pose no threat to people at the facility or in the community. When food is added for these microbes, their population grows and they consume not just the cheese whey and molasses, but also the solvents in the ground water beneath Romic. The microbes break down the solvents, cheese whey, and molasses into carbon dioxide and water, similar to the way a septic system treats sewage from a home. Enhanced biological treatment processes have successfully cleaned many polluted sites and are being used at more than 50 hazardous waste sites across the country. Enhanced biological treatment is also safe because it relies on non-harmful microbes that occur naturally in soil.



#### What is a solvent?

Solvents are liquids used to dissolve or remove other substances. For example, solvents can remove grease from metal parts. Typical solvents include chemicals like trichloroethylene (TCE) and tetrachloroethylene (PCE).

#### What is cheese whey?

Cheese whey is the watery part of milk that is separated from the curd in the process of making cheese.



## Closing Romic

Romic representatives have indicated that the process for closing the East Palo Alto facility will begin in 2007. Romic stopped accepting waste on August 3, 2007. Regulatory oversight of the Romic facility closure is the responsibility of the California Environmental Protection Agency, Department of Toxic Substances Control (DTSC). U.S. EPA and DTSC will coordinate plans for soil and ground water remediation with Romic's closure. U.S. EPA anticipates that most of the site cleanup should be done in about seven years after the Romic facility closure is completed.

Sediments in the slough adjacent to Romic's eastern boundary are contaminated with volatile organic compounds such as the solvents TCE and PCE. U.S. EPA is having discussions with the agencies responsible for protection of wildlife regarding the contaminated sediments in the slough. These discussions could result in additional ecological studies being conducted at the slough. In order to expedite the on-site cleanup process at the Romic facility, contaminated sediments in

the slough are not addressed in this remedy decision but will be covered in a later action.

This fact sheet describes the proposed remedy, other alternatives evaluated and the criteria that U.S. EPA used to evaluate alternatives. U.S. EPA prepared a comprehensive report on the proposed remedy called a Statement of Basis. This fact sheet summarizes the Statement of Basis which is available for review at the East Palo Alto Public Library or by contacting U.S. EPA.

### Summary of Proposed Remedy

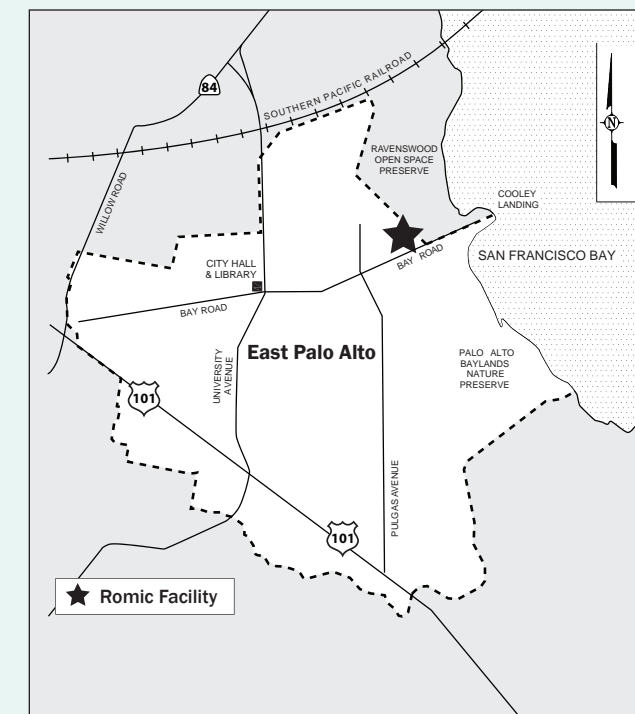
U.S. EPA's proposed remedy includes the following elements:

- Ground water and soil investigation and remediation
- Monitoring and reporting to evaluate remedy effectiveness
- Funding (financial assurance) for the remediation
- Land use restrictions

### Site History

Romic is a 14-acre hazardous waste management facility located at the east end of Bay Road in East Palo Alto, California. Historical facility operations included solvent recycling, fuel blending, wastewater treatment and hazardous waste storage and treatment. Waste management practices dating back to the 1950s resulted in the contamination of soil and ground water below the Facility.

The primary contaminants in the soil and ground water are volatile organic compounds (VOCs). Typical VOCs include dry cleaning chemicals, carburetor cleaning liquids, paint thinners and chemicals used to manufacture computers. Ground water contamination extends across most of the Romic facility to a depth of at least 80 feet below ground surface. Ground water at the site flows east toward San Francisco Bay. Ground water at the Romic facility is not a drinking water source. Available data suggests that Facility-related contaminants are not significantly impacting San Francisco Bay.



Romic Site Location, East Palo Alto



**Ground Water and Soil Investigation and Remediation**

The proposed approach to cleaning up contamination at the Romic facility uses enhanced biological treatment, monitored natural attenuation, excavation and removal of contaminated soils and maintenance of the existing site cover.

Romic is currently using biological treatment to clean up contaminated soil and ground water at several locations throughout the site as part of a U.S. EPA approved interim remedial measure. The biological treatment will be expanded as part of the proposed remedy.

Although the Romic facility has been extensively investigated, contaminated areas below existing buildings and operational areas have not been fully evaluated. Romic will investigate the extent of contamination below the existing buildings, tanks and structures after they are demolished during closure of the Romic facility. These previously-inaccessible areas will then be cleaned up by biological treatment and/or excavation.

**Monitoring and Reporting to Evaluate Remedy Effectiveness**

Romic will monitor ground water and surface water to assess site conditions and the effectiveness of the selected remedy. Additionally, Romic will provide progress reports several times per year and comprehensive evaluation reports every five years to update the community and the regulatory agencies on the status of the investigation and remediation activities.

**Financial Assurance**

Financial assurance is necessary for construction, operation, monitoring and maintenance of the selected remedy. Financial assurance means that Romic has set aside money (e.g., bonds, insurance, etc.) to ensure that the required work will be completed. In June 2007, Romic established a \$1.5 million surety bond as the financial assurance mechanism for corrective action at the Facility. The funding level will be adjusted to reflect the cost estimate for the selected remedy.



U.S. EPA Project Manager Ron Leach collecting a ground water sample.

**Land Use Restrictions**

The proposed remedy requires that certain restrictions be imposed on future land use activities. Even with the demonstrated success of the proposed remedial technology, U.S. EPA is proposing that the Facility property use be restricted to commercial and industrial purposes. Property redevelopment is prohibited until a project-specific risk management plan is developed and approved. The risk management plan ensures that potential impacts from site-related contamination are managed in a manner that is protective of human health and the environment.

**Summary of Remedial Alternatives**

In developing the proposed remedy, U.S. EPA considered and evaluated the following three remedial alternatives. The remedial alternatives were developed by Romic under U.S. EPA oversight. U.S. EPA's evaluation of the remedy alternatives is documented in the Statement of Basis.

- Alternative 1:** No Further Action
- Alternative 2:** Hydraulic Containment
- Alternative 3:** Enhanced Biological Treatment

**Alternative 1: No Further Action**

Alternative 1 includes no further monitoring or remediation. This alternative has been included as a baseline for comparison only.

**Alternative 2: Hydraulic Containment**

Alternative 2 uses ground water extraction and treatment ("pump and treat") as the primary remedial technology. Using this technology, contaminated ground water would be pumped out of the ground and treated to remove contaminants. The ground water extraction wells would contain the contamination on-site but would not remediate the source of the contamination, so highly contaminated soil and ground water would remain at the Facility. Alternative 2 is anticipated to cost \$3.5 million dollars.

**Alternative 3: Enhanced Biological Treatment (U.S. EPA's Preferred Alternative)**

Alternative 3 uses enhanced biological treatment as the primary remedial technology. Enhanced biological treatment is a technology which can effectively contain the contamination on-site and also remediate contamination source areas. Alternative 3 is anticipated to cost \$2.5 million dollars.

Alternatives 2 and 3 both include ground water and soil investigation, excavation and removal of some contaminated source area soils, monitoring and reporting to evaluate remedy effectiveness, financial assurance and land use restrictions.



Cheese whey and molasses injection at Romic



1997 Aerial Photograph of Romic

**Evaluation of Remedial Alternatives**

U.S. EPA used a two-step process to evaluate potential remedial alternatives. First, each alternative was compared to five remedy performance standards (see Evaluation Criteria on page 6). If one or more of the remedial alternatives appeared capable of achieving the remedy performance standards, those alternatives were evaluated against the seven balancing/evaluation criteria to identify the preferred alternative. After evaluating the remedial alternatives, U.S. EPA determined that the proposed remedy (Alternative 3, Enhanced Biological Treatment) best meets the remedy performance standards and balancing/evaluation criteria due to its effectiveness at both containing and remediating the contaminated soil and ground water.

**Proposed Remedy is Protective of Human Health and the Environment**

U.S. EPA has concluded, based on all the information available to date and an evaluation of the remedial alternatives, that the proposed remedy is protective of human health and the environment. The proposed remedy has the best chance of attaining the cleanup objectives, remediating source areas and limiting off-site migration of volatile organic compounds.



## Evaluation Criteria for Selecting a Remedy for the Romic Facility

### Performance Standards

#### Protect Human Health and the Environment

Ability and effectiveness of the alternative to protect human health and the environment.

#### Attain Media Cleanup Objectives

Ability of the alternative to achieve cleanup standards.

#### Remediate the Source(s) of Releases

Ability and effectiveness of the alternative to reduce or eliminate further releases of hazardous wastes (including hazardous constituents).

#### Control Off-Site Migration of Contaminated Ground Water

Ability and effectiveness of the alternative to control the off-site migration of contaminated ground water.

#### Limit Potential for Vapor Intrusion Into Structures

Ability and effectiveness of the alternative to limit vapor intrusion into structures. Vapor intrusion is the migration of chemical vapors, primarily volatile organic compounds, from below ground into indoor air.

### Balancing/Evaluation Criteria

#### Reduction of Toxicity, Mobility or Volume Through Treatment (TMV)

Ability and effectiveness of alternative to reduce the toxicity, mobility and volume of the hazardous components present at a site.

#### Long-Term Effectiveness

Ability and effectiveness of alternative to maintain reliable protection of human health and the environment over time. Includes an assessment of the extent of any residual risk.

#### Short-Term Effectiveness

Short-term effectiveness of an alternative considers the length of time needed to implement a remedy alternative and the risk the alternative poses to workers, residents and the environment during implementation.

#### Implementability

The anticipated technical and administrative feasibility of an alternative, including the availability of materials and services needed to carry it out.

#### Cost

The estimated construction and operation & maintenance costs of each alternative for the anticipated life of the remedy.

#### Community Acceptance

Extent to which an alternative is acceptable to the interested community.

#### State Acceptance

Extent to which an alternative is acceptable to the State.

## Community Participation

U.S. EPA welcomes community input on the proposed remedy. U.S. EPA has established a 45-day public comment period that begins on September 17 and ends on November 1, 2007.

Interested parties can submit written comments to U.S. EPA during the public comment period via mail, email or in person at the public meeting and hearing on the proposed remedy. The public meeting and hearing will be held on Wednesday, October 10, 2007 from 6:00 to 9:00 pm at the East Palo Alto City Hall, which is located at 2415 University Avenue (First Floor - City Council Chambers and Community Room). Spanish translation will be available at the meeting and hearing.

Written comments should be postmarked on or before November 1, 2007 and sent to:

Ronald Leach, Project Manager (WST-5)  
U.S. Environmental Protection Agency  
75 Hawthorne Street  
San Francisco, CA 94105  
(415) 972-3362

Comments may also be faxed to (415) 947-3530 or sent via electronic mail to [leach.ronald@epa.gov](mailto:leach.ronald@epa.gov)



Ron Leach and Lauren Berkman of U.S. EPA at 2007 Cinco de Mayo event in East Palo Alto.

U.S. EPA will consider the public comments received in making the remedy decision for the Facility. In selecting the final remedy, U.S. EPA may modify the proposed remedy based on relevant public comments, new information or further U.S. EPA deliberation. U.S. EPA will respond to all the relevant comments it receives on the proposed remedy. Anyone who comments on the proposal will receive notice of the final remedy decision.

### Want to Know More?

All of the documents, correspondence, data and other information U.S. EPA considered in proposing the remedy for the Romic facility are included in the Administrative Record for the Facility. Copies of key documents used in the remedy selection process and an index of the complete Administrative Record are available for public review at the East Palo Alto Public Library, located at 2415 University Avenue, East Palo Alto, California 94303. The entire Administrative Record is available for public review at the U.S. EPA office, located at 75 Hawthorne Street, San Francisco, California. Contact the Project Manager, Ronald Leach, at (415) 972-3362 or by email at [leach.ronald@epa.gov](mailto:leach.ronald@epa.gov) if you would like to make an appointment to review these documents or need further information.

### Contact Information

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