UNITED STATES

ENVIRONMENTAL PROTECTION AGENCY

REGION III

STATEMENT OF BASIS

Safety Kleen

Baltimore, Maryland

EPA ID NO. MDD 981 034 291

I. Introduction

The United States Environmental Protection Agency (EPA) has prepared this Statement of Basis (SB) for the Safety Kleen facility located at 1448 Desoto Road, Baltimore, MD (Facility). EPA's review of available information, including a site visit on June 23, 2010, indicates that there are no unaddressed releases of hazardous waste or hazardous constituents from the Facility. Based on that assessment, our proposed decision is that no further investigation or cleanup is required. EPA has determined that its proposed decision is protective of human health and the environment and that no further corrective action or land use controls are necessary at this time. This SB highlights key information relied upon by EPA in making its proposed decision.

The Facility is subject to EPA's Corrective Action Program under the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act (RCRA) of 1976, and the Hazardous and Solid Waste Amendments (HSWA) of 1984, 42 U.S.C. §§ 6901 et seq. (Corrective Action Program). The Corrective Action program is designed to ensure that certain facilities subject to RCRA have investigated and cleaned up any releases of hazardous waste and hazardous constituents that have occurred at their property. Maryland is not authorized for the Corrective Action Program under Section 3006 of RCRA. Therefore, EPA retains primary authority in the state for the Corrective Action Program.

The Administrative Record (AR) for the Facility contains all documents, including data and quality assurance information, on which EPA's proposed decision is based. See Section V, Public Participation, for information on how you may review the AR.

II. Facility Background

The Facility is located at 1448 Desoto Road, Baltimore, MD. The Facility is bordered by moderate industrial facilities, except for residential properties to the south. Interstate 95 runs approximately 400 feet to the northwest of the Facility. The Facility covers .66 acres.

The Facility began activities regulated under the Resource Conservation and Recovery Act (RCRA) in 1985, according to the February 28, 1985 Notification of Hazardous Waste Activity from Safety Kleen to EPA. Safety-Kleen has been the only owner of the Facility.

Activities at this Facility include the leasing and servicing of Safety-Kleen parts cleaning equipment, mineral spirits, and immersion cleaners. In addition, Safety-Kleen sells perchloroethylene to dry cleaning establishments.

This Facility operates as a storage and transfer Facility that accepts and stores wastes generated by their clients, primarily engaged in the automotive, mechanical repair, and dry cleaning industries. The wastes are either maintained in storage units at the Facility or transferred from truck to truck. Additionally, the Facility generates hazardous wastes during drum cleaning. All hazardous wastes stored at the Facility are eventually removed and taken to other Safety-Kleen treatment and recycling facilities. The Facility uses three Aboveground Storage Tanks (ASTs); one is permitted to store parts washer solvents (hazardous waste), one stores parts washer solvent (product), and the third stores waste oil.

On September 26, 1994, the Maryland Department of the Environment (MDE) authorized

Safety-Kleen to operate as a Controlled Hazardous Substances (CHS) facility in a response to Safety-Kleen's CHS Permit renewal request (Permit No. A-300). On March 3, 2008, MDE issued a Draft CHS Permit in response to Safety-Kleen's request for permit modifications to expand a hazardous waste container truck-to-truck transfer area located inside the building and relocate the Return and Fill Station to a more secure area within the Facility. On June 6, 2008, MDE renewed Safety-Kleen's CHS facility permit with the requested modifications for 10 years.

III. Summary of Environmental History

EPA's review of available information indicates that there are no unaddressed spills of hazardous waste or hazardous constituents from the Facility. Safety Kleen Baltimore, Maryland had a number of spills summarized below. All of the spills occurred on paved surfaces. The majority of the site is covered with asphalt and concrete and operations that take place outdoors are within secondary containment. All spills were immediately cleaned up by Facility personnel. There are no instances or evidence of soil or groundwater contamination. A Facility site plan (see Figure 1) has the locations of spills described in detail in this document identified as the Areas of Concerns (AOC) or Solid Waste Management Units (SWMU).

Current groundwater conditions are not known as no monitoring wells have been installed. However, the site and surrounding areas are served by public water and sewer and Baltimore City does not allow groundwater for use as potable water.

SWMU No. 4 - Return and Fill Station

This SWMU consists of two 375-gallon steel units (also known as Wet Dumpsters) located at each end of a platform in the dump and load shed. Two rectangular, 6-inch deep steel pans provide secondary containment on a concrete slab beneath the shed. A documented release has occurred from this unit. A release was identified during a routine inspection on January 24, 2004 and was cleaned up. A waste solvent pump below the Return and Fill Station grated floor developed a leak which was repaired. The leak occurred in an area with secondary containment, was immediately cleaned up and did not reach soil or groundwater, therefore no further investigation is necessary.

AOC B - June 2010 Solvent Release

According to a Spill Report submitted to MDE by Safety-Kleen on June 9, 2010, a contractor had performed maintenance at the Return and Fill Station. Safety-Kleen suspected a coupling on a 2-inch line became cracked as a result of the contractor's movement in the work area. During an internal Safety-Kleen inspection, 2 to 5 gallons of used solvent were found to have gravity flowed through the cracked coupling onto a spill pad and asphalt below. The leak traveled several feet over asphalt before pooling. Upon discovery, spill mats, booms, and other absorbent material were used to clean up the spill. The asphalt was then cleaned with a degreaser to remove residual material. The release did not reach soil, groundwater, or storm drains. MDE was contacted and no further action was requested of Safety-Kleen. The absorbent material was placed in 55-gallon drums and shipped to a Safety-Kleen facility in Kentucky for disposal. A small amount of solvent was spilled, did not leave the asphalt pad, was immediately cleaned up and did not reach soil or groundwater, therefore no further investigation is necessary.

AOC C - February 2000 Used Oil Release

According to the May 2003 Spill Prevention, Control, and Countermeasures (SPCC) Plan, 30 to 35 gallons of used oil were released on February 24, 2000 when the lid of a strainer at the tank inlet failed during off-loading operations. MDE was notified in writing of this release on March 1, 2000. A containment curb prevented the spill from leaving the site and absorbents were used to collect the oil. The failure of the lid was attributed to back pressure on the strainer due to ice accumulation on the strainer. The cause of the ice was a malfunction in the heat trace system. To prevent a spill from reoccurring, a warning light was wired to the control panel to notify the operator that the heat trace system is in operation. The spill occurred in an area with secondary containment, was immediately cleaned up and did not reach soil or groundwater, therefore no further investigation is necessary.

AOC D - July 2001 Waste Paint Release

A July 30, 2001 letter from Safety-Kleen to MDE described a waste paint release which occurred on July 20, 2001. An employee was loading waste drums on an over-the-road trailer with a forklift drum grabber attachment when one of the 55-gallon drums fell to the floor and was struck by the forklift. The drum was damaged and the entire contents spilled to the floor of the trailer. Approximately 10 gallons spilled outside the trailer to the asphalt pavement. The spill was contained with absorbent mats and granular absorbent to prevent the material from migrating to the environment. The spill occurred in an area with asphalt pavement, was immediately cleaned up and did not reach soil or groundwater, therefore no further investigation is necessary.

AOC E - December 2001 Waste Mineral Spirits Solvent Release

A December 27, 2001 letter from Safety-Kleen to MDE described a waste mineral spirit solvent release which occurred on December 19, 2001 during tank truck loading operations. Human error caused the tanker truck to overfill releasing 40 gallons of material to asphalt pavement. The spill was contained with absorbent booms, absorbent mats, and granular absorbent to prevent the material from migrating to the environment. The spill occurred in an area with asphalt pavement, was immediately cleaned up and did not reach soil or groundwater, therefore no further investigation is necessary.

AOC F - February 26, 2004 Petroleum Naphtha Release

According to a February 26, 2004 Safety-Kleen Spill Report, less than one gallon of petroleum naphtha was released to a concrete apron when an employee inadvertently lost control of a dispensing nozzle while filling a drum. Material was cleaned up with absorbent material. The spill occurred in an area with concrete pavement, was a small volume of spilled material, was immediately cleaned up and did not reach soil or groundwater, therefore no further investigation is necessary.

AOC G - March 12, 2004 Used Motor Oil Release

According to a March 12, 2004 Safety-Kleen Spill Report, one-quarter gallon of used motor oil was released when an employee tipped over a 30-gallon steel drum containing used oil filters. The drum lid became loose allowing a small amount of oil to leak onto a concrete apron. Absorbent materials were deployed to remediate the spill. The spill occurred in an area with concrete pavement, was a small volume of spilled material, was immediately cleaned up and did not reach soil or groundwater, therefore no further investigation is necessary.

AOC H - September 15, 2006 Solvent Product Release

According to a September 15, 2006 letter from the Facility to MDE, approximately 20 gallons of solvent product were released to asphalt during drum filling operations. The release flowed approximately 20 feet from the source area, but did not impact storm drains or waterways. The drum being filled had a hole that was not detected prior to commencement of filling operations. The operator stopped filling the drum when the leak was realized and deployed absorbent material. The spill occurred in an area with asphalt pavement, was immediately cleaned up and did not reach soil or groundwater, therefore no further investigation is necessary.

Records Review

Review of all available records during January and February 2010 and discussions during a June 23, 2010 site visit by EPA indicate that there have been no instances or evidence of soil or groundwater contamination, no site remediation, and no past, current, or planned monitoring efforts necessary at this Facility. There are no documented releases to soil or groundwater. All spills and clean ups have been documented and reported to MDE.

IV. Environmental Indicators

EPA sets national goals to measure progress toward meeting the nation's major environmental goals. For Corrective Action, EPA evaluates two key environmental indicators for each facility: (1) current human exposures under control and (2) migration of contaminated groundwater under control. The EPA has determined that the Facility met these indicators on December 15, 2011 and August 18, 2010.

V. Public Participation

Before EPA makes a final decision on its proposal for the Facility, the public may participate in the remedy selection process by reviewing this SB and documents contained in the Administrative Record (AR) for the Facility. The AR contains all information considered by EPA in reaching this proposed decision. It is available for public review during normal business hours at:

U.S. EPA Region III
1650 Arch Street
Philadelphia, PA 19103
Contact: Leonard E. Hotham
Phone: (215) 814-5778
Fax: (215) 814-3113
Email: hotham.leonard@epa.gov

Interested parties are encouraged to review the AR and comment on EPA's proposed decision. The public comment period will last thirty (30) calendar days from the date that notice is published in a local newspaper. You may submit comments by mail, fax, or e-mail to Leonard E. Hotham. EPA will hold a public meeting to discuss this proposed decision upon request. Requests for a public meeting should be made to Leonard E. Hotham.

EPA will respond to all relevant comments received during the comment period. If EPA determines that new information warrant a modification to the proposed decision, EPA will

modify the proposed decision or select other alternatives based on such new information and/or public comments. EPA will announce its final decision and explain the rationale for any changes in a document entitled the Final Decision and Response to Comments (FDRTC). All persons who comment on this proposed decision will receive a copy of the FDRTC. Others may obtain a copy by contacting Leonard E. Hotham at the address listed above.

Date: 2/7/2012

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Abraham Ferdas, Director
Land and Chemicals Division
US EPA, Region III