



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7**

11201 Renner Boulevard
Lenexa, Kansas 66219

NOV 16 2016

MEMORANDUM

SUBJECT: Supplemental Memo for CA999; Univar, Inc., Springfield, Missouri
EPA ID No. MOR000504795

FROM: Sean Clary, Project Manager
Waste Remediation and Permitting Branch
Air and Waste Management Division

THRU: Don Lininger, Chief
Waste Remediation and Permitting Branch
Air and Waste Management Division

TO: Site File

PURPOSE:

The purpose of this memo is to serve in conjunction with documentation gathered from the Missouri Department of Natural Resources as supplemental support for the path forward suggested in the August, 2016 Memorandum, "Assessment of Univar, Inc., Springfield, Missouri, EPA ID No. MOR000504795".

BACKGROUND:

The aforementioned Univar, Inc. facility is located at 220 South Barnes Avenue, Springfield, Missouri. The facility was permitted as a storage facility between 1984 and 1994. During this time the hazardous waste storage area went unused as incoming wastes were accumulated on the transports. A RCRA Facility Assessment report was completed by MDNR on August 18, 1993, and the facility underwent closure for the permitted storage area under a plan approved in 1995.

The RFA identified two solid waste management units and an Area of Concern. SWMU 1 was the unused hazardous waste storage area. A low potential for impacts to surface water ground water, subsurface soil gas, or air was designated for this SWMU. SWMU 2 consisted of a solid waste dumpster. It was concluded that this SWMU had no potential for impacts to the same environmental receptors. The Area of Concern was identified as the hazardous waste transport parking area. The RFA indicated that there was a low potential for impacts at this area due to the fact that the waste drums were always contained within a transport bed and that the transports were always parked on the concrete loading dock area.

The site assessment memo called for supporting documentation to confirm RCRAInfo closure events. Documentation describing the 1995-1996 closure activities has been received and filed with the U.S. Environmental Protection Agency Region 7 records center. The documentation includes:

Closure and Post-Closure Plan



Closure Documentation Report
Additional Closure Activities Letter Report
Closure Inspection Memo
Closure Acceptance Memo

PERMITTED STORAGE UNIT:

The final closure plan for the Part B permitted hazardous waste container storage unit at the Van Waters & Rogers, Inc. facility located in Springfield, Missouri indicated the closure performance standards, closure and decontamination procedures, and sampling procedures.

CLOSURE PERFORMANCE STANDARD:

The approved standard for closure used for guidance indicated that upon completion of all surface decontamination activities, a final rinsate sample would be taken and analyzed. The concentrations of hazardous constituents were to be compared to practical quantitation limits and concentrations less than the limits would be deemed successfully decontaminated.

Failure to achieve PQL's in the rinsate would trigger wipe sampling with comparison to PQL's. Failure to achieve PQL's in the wipe samples would trigger concrete samples for comparison to PQL's and trace metals analysis. If all of the above sampling failed, soil sampling was to be taken with comparison to PQL's and unaffected part(s) of the property [for metals comparison].

If none of the above criteria were met, a notification would be given to MDNR and a revised closure plan would be developed.

CLOSURE SAMPLE RESULTS:

During the initial closure activities wash water, rinse water, and concrete core leachate samples were taken and analyzed. The semi-volatile organic compound di-n-butyl phthalate was detected in the rinse water at a concentration of .038 mg/L, an order of magnitude lower than the wash water, and was initially attributed to the storage of polymer drums on the pad. DNB is not on the US EPA TCLP list.

Due to the above described results, MDNR requested that additional closure work be performed at the HWMU to address the DNB concentrations. Another round of high temperature/high pressure cleaning was conducted and the final wash water concentration was .16 mg/L with a non-detect for DNB in the rinse water. No other SVOCs were detected. The concrete core samples both contained detectable DNB concentrations which were concluded to be from plasticizers used during the placement process of the concrete. Supporting documentation was provided for this claim as "Attachment B" of the Additional Closure Activities Letter Report.

RECOMMENDATIONS:

The Missouri Department of Natural Resources verified the clean closure of the former storage area as of December 27, 1996. The facility was released from financial assurance for the waste management unit. The aforementioned RFA did not identify areas of likely release of contamination. I recommend moving forward with the CA400, CA550NR and CA999 designations for the facility at 220 South Barnes Avenue using the RFA, the assessment memo, and the documentation provided by MDNR certifying the validity of clean closure activities as support for the decision.