




**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7**


11201 Renner Boulevard
Lenexa, Kansas 66219

AUG 05 2016

MEMORANDUM

SUBJECT: Assessment of Univar, Inc., Springfield, Missouri
RCRA ID # MOR000504795

FROM:  Chris Jump, Project Manager
AWMD/WRAP

THRU:  Don Lininger, Chief
AWMD/WRAP

TO: Site File

PURPOSE:

The purpose of this memo is to evaluate the need for corrective action and recommend a path forward for the Univar, Inc. facility located at 220 South Barnes Avenue, Springfield, Missouri, RCRA ID # MOR000504795.

BACKGROUND:

The former McKesson Chemical Company, located at 505 East Trafficway, Springfield, Missouri submitted an initial RCRA Part A application on November 17, 1980. On April 8, 1982, the Part B application was called in by the U.S. Environmental Protection Agency; however, prior to the Part B application being submitted, the facility requested permission to close the 505 E. Trafficway location and open a new location at 220 South Barnes Avenue, Springfield, Missouri. The EPA granted permission to relocate the facility and allowed McKesson to retain the original RCRA ID # MOD0008823229 and submit the Part B application for the new location. On October 6, 1982, a new Part A application was submitted for the 220 South Barnes address.

On September 1, 1984, MDNR issued the facility an operating permit. RCRAInfo indicates that the EPA issued a standardized permit to the facility effective September 15, 1984. This RCRAInfo entry is supported by a letter from the permittee dated, September 2, 1994, which states that the MDNR RCRA Part B Permit for hazardous waste container storage expires on September 1, 1994, and the U.S.EPA RCRA Part B Permit expires on September 15, 1994.

On September 2, 1994, the permittee submitted notice that they intended to cease waste storage activities at the facility and would not be renewing the permits. According to RCRAInfo, a revised closure plan was approved on February 13, 1995, closure certification was submitted on May 10, 1996, and verification of clean closure was completed on December 27, 1996; however, the EPA does not have any documents in the file to confirm these dates.



A RCRA Facility Assessment report was completed by MDNR staff on August 18, 1993. This RFA identified 2 Solid Waste Management Units and one Area of Concern. The SWMUs were identified as 1) the hazardous waste storage area and 2) the solid waste dumpster. The AOC was identified as the hazardous waste transport parking area. The RFA states that the hazardous waste storage area has never been used because all wastes were accumulated on the transports. The RFA indicated there was a low potential for impacts to surface water, ground water, subsurface soil gas, and air from SWMU 1 and no potential for impacts to these media from SWMU 2. The RFA also concluded that there was low potential for impacts to environmental media from AOC 1 due to the fact that waste drums were always contained within a transport bed and that the transports were always parked on the concrete yard area of the loading dock. The executive summary of the RFA concluded that no further action was necessary.

A compliance inspection report dated November 5, 1993, stated that the permitted hazardous waste storage pad has never been used and waste was stored on trailers for less than 11 days while in transit. This trailer parking area is AOC 1.

On November 10, 2009, a closed facility oversight inspection was conducted by MDNR personnel. The inspection report summarized and provided details of the clean closure activities associated with SWMU 1 (which are not contained in the EPA's files). The inspection report documented some cracks in the transport parking area, but did not identify any evidence of releases.

The 2009 inspection included both the original McKesson location at 505 East Trafficway and the 220 South Barnes Avenue facility, because there was confusion created by allowing the RCRA ID # to be transferred between two locations. Due to this confusion, a new RCRA ID #, MOR000504795, was generated for the Facility located on Barnes Avenue; however, all historical records except the 2009 inspection report are located in the EPA's files under ID # MOD000823229.

RECOMMENDATIONS:

I recommend coordinating with MDNR to confirm that the closure activities listed in RCRAInfo are accurate and documented sufficiently. Based on information located in the RFA and site inspections, it seems unlikely that there are significant environmental impacts associated with the facility at 220 South Barnes Avenue. I recommend pursuing a CA400, CA550 and CA999 designation for this facility using the Clean Closure Report (if confirmed), the RFA and the inspections as documentation; however, since SWMU 2 and AOC 1 have never been investigated, I believe it is appropriate to follow the procedure documented in the *WRAP Recommended Public Procedures for No Further Action –CA999-Non Notifier Facilities Subject to Corrective Action* even though this facility is not a non-notifier.