



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029**

SUBJECT: Safety-Kleen Systems, Incorporated
12164 Tech Road
Silver Spring, Maryland 20904
RCRA ID: MDD000737395

DATE: 11/16/2021

Long-term Stewardship Assessment

FROM: Caitlin Elverson, Project Manager (3LD10)

TO: Long Term Stewardship File for Safety-Kleen Systems Incorporated
RCRA Corrective Action Branch 2 (3LD10)

Remedy Review Summary:

EPA's Final Decision (11/21/2014) for Safety-Kleen Systems Incorporated consists of land use controls, vapor intrusion controls, groundwater restrictions and groundwater monitoring at the site. A Consent Order and Agreement (AOC) was issued on 9/30/2015 which required Safety-Kleen to implement the Final Decision through groundwater monitoring and installation of a vapor intrusion system. An Environmental Covenant was issued on 11/1/2017 which restricted the property to non-residential use, and prohibited groundwater for potable purposes. EPA has determined that the property is in conformance with EPA's remedy decision, covenant and consent order obligations and restrictions.

Document Review:

A site visit was performed on 10/26/2021, showing that property use has not changed since the final remedy, order, and covenant implementation. The Facility submitted their January 2021 Corrective Measures Implementation Assessment (CMI) Report to EPA, which demonstrated conformance with the AOC for annual groundwater monitoring, sub-slab depressurization system (SSDS) operation and maintenance, and reporting of Institutional Controls. Groundwater monitoring results show an overall decrease in the contaminants of concern (COC) in the groundwater plume at the Facility. The CMI Report also indicates that the Facility is not using groundwater on the facility property and no new wells were installed on the facility. The SSDS installation at the Facility was completed on February 25-27, 2016 and is still active in the building.

The Administrative Order on Consent (AOC), Final Decision, and Environmental Covenant can be found on EPA's Fact Sheet for the Facility. The Environmental Covenant lists the current property Owner/Grantor and Holder/Grantee as BDC Spectrum LLC. AOC obligations and restrictions are



summarized in the Table below. The Environmental Covenant applies to the areas outlined in the Figure below.

Background:

The Facility was active from 1982 to 1996. The former service center consisted of approximately 10,300 square feet which was used as an accumulation point for spent solvents and other fluids generated by Safety Kleen customers. All wastes stored at the site were ultimately shipped to an off-site Safety Kleen recycle center or a contract reclaimer. Previously underground storage tanks (USTs) were used at the site. During their removal in 1986, soil was excavated from the tank pit and confirmatory soil samples were taken. The results from these samples detected total petroleum hydrocarbons (TPH) as mineral spirits and a number of volatile organic compounds in the soil. Groundwater monitoring at this site has been on-going since July 1989 and have historically shown detections of TPH, benzene, toluene, ethylbenzene, xylene, and some volatile organic compounds. Based on these findings, the former tank pit area, former return and fill station area, and the former piping trench were the focus of remedial efforts at the site.

Safety Kleen has operated a Soil Vapor Extraction (SVE) system at the site since August 1993. The Maryland Department of the Environment (MDE) issued a Post Closure Permit for the area in February 2001, which includes remediation goals and requirements for the cleanup of the groundwater and soil. The SVE system recovery rate had diminished to zero asymptotically. An attempt was made to recover additional contaminants by operating the system in a pulsing mode by turning it off for a period of time and then on again. However, no significant additional recoveries were attained and the system was shut down during 2011.

The Facility building contained two solvent storage areas. Safety-Kleen also stored PCE product for distribution to local dry cleaners and collected and temporarily stored spent PCE from local customers. In addition, PCE was spilled in the parking lot area from loading and unloading of solvents. MDE inspection reports also include details of leaking containers and problems with secondary containment for the PCE tanks in the building. The Facility is impacted by PCE contamination in groundwater from the neighboring former International Fabricare Institute (IFI) facility to the north. The PCE plume associated with the IFI facility covers approximately 30 acres and impacts groundwater to the southeast of the Facility. The main contaminants in the groundwater and soil are total petroleum hydrocarbons, BTEX compounds (benzene, toluene, ethylbenzene, and xylenes) and a number of volatile organic compounds.

Documents Reviewed:

EPA Facility Fact Sheet, which includes EPA Final Decision (11/21/2014), Statement of Basis for Remedy (05/14/2014), Environmental Covenant (11/01/2017), Environmental Indicator Forms, Facility boundary and Covenant areas; RCRAInfo database; and Annual Progress Report and Corrective Measure Implementation Assessment Report, Former Safety-Kleen Corp (S-K) Service Center (01/22/2021).



Facility Name	Safety-Kleen Inc.			
Address	12164 Tech Road, Silver Spring, MD 20904			
EPA ID Number	MDD000737395			
Are there restrictions or controls that address:	Yes	No	Area(s)	Description of restrictions, controls and mechanism
Groundwater Use	X		Entire Facility	Groundwater at the Facility shall not be used for any purpose other than the operation, maintenance, and monitoring activities. Compliance with the EPA-approved groundwater monitoring program. No new wells shall be installed on Facility property.
Residential Use		X		
Excavation		X		
Vapor Intrusion	X			A vapor intrusion control system shall be installed in each current and new structure constructed at the facility.
Capped Area(s)		X		
Other Engineering Controls		X		
Other Restrictions	X			Within one month after any of the following events, the then current owner and/or operator of the Facility shall submit to EPA written documentation describing the following: observed noncompliance with the groundwater use restrictions; transfer of the Facility; changes in use of the Facility; or filing of applications for building permits for the Facility and any proposals for any site work, if such building or proposed site work will affect the contamination on the Facility.