



Long-Term Stewardship Assessment Visit Report

Safety-Kleen Wheeling Branch Service Center

EPA ID #: WVD981034101

Wheeling, WV 26003

Assessment Date: August 7, 2024

Introduction: In EPA Region 3 and its RCRA-Authorized states, a “Long-Term Stewardship (LTS) Assessment Visit” refers to a site inspection that includes both a record review and a field inspection to ensure that the remedies are implemented and maintained according to the final decision. This involves evaluating whether a previously remediated facility or a former facility site continues to meet the environmental protection standards over time by ensuring that engineering controls (ECs) are maintained and that institutional controls (ICs) continue to be enforced. The LTS program periodically assesses the efficacy of the implemented remedies (i.e., ECs and ICs) and to update the community on the status of the RCRA Corrective Action facilities.

Facility Background: The Safety-Kleen Systems, Incorporated (Safety-Kleen) facility occupies an approximately 4-acre parcel located at 10 Industrial Park in Wheeling, West Virginia (Facility). Safety-Kleen has operated at the Facility since 1984 as an accumulation center for spent solvents generated by its customers and a distribution center for clean solvents to be delivered to its customers. The spent solvents are ultimately shipped to a Safety-Kleen recycling facility or a contract reclaimer, and then returned to the Safety-Kleen's customers as product. Structures include a building with offices and a warehouse for container storage, a flammable waste storage building, and two tank farms surrounded by concrete diking.

The surrounding area includes a mixture of light industrial and high-density residential properties. No structures are present in the area to the northwest of the Facility. Liquid Assets Disposal Incorporated, a company specializing in waste reduction, disposal, and recycling services, occupies the property upgradient to the southeast of the Facility. W. A. Wilson Incorporated, a glass distributor, is located cross gradient to the south of the Facility. Tradet Laboratories is located immediately southwest of the Facility boundary, and AES Industries, an HVAC component manufacturer, is located northeast of the Facility property. Wheeling Creek circles around the northwestern margin of the Facility. Groundwater flows northwest across the Facility to Wheeling Creek, which is a tributary to the Ohio River.

West Virginia Department of Environmental Protection (WVDEP) issued a Hazardous Waste Management Permit, Permit Number: WVD981034101 to Safety-Kleen on September 24, 2014 for the purposes of operating hazardous waste management units of one storage tank and two storage container areas. The Permit, which expired on September 24, 2024, has been administratively extended. WVDEP is in the process of renewing the RCRA TSD permit at the time of the writing of this report.

EPA conducted a Site Inspection (SI) on October 7, 2009 to consolidate relevant information for the Facility. During the SI, EPA noted two spill events have been recorded at the Facility. During the first spill in May 1990, Facility personnel discovered hydrocarbons discharging from a PVC pipe whose outfall was located near the northern corner of the Facility property. The outfall and the sump near the return and fill were immediately capped. In addition, Safety-Kleen personnel excavated soils containing

minerals spirits down gradient of the PVC pipe outfall; approximately 60 cubic yards of soil were excavated and stockpiled. All work was completed under the auspices and approval of the West Virginia Department of Environmental Protection (WVDEP). As a result of groundwater monitoring conducted during the remediation, groundwater was found to contain perchloroethylene (PCE).

Current Site Status: On July 9, 2014, EPA issued the Final Decision and Response to Comments (FDRTC). The final remedy consists of monitored natural attenuation (MNA) until drinking water standards are met, along with compliance with and maintenance of institutional controls. The final remedy detailed in the FDRTC is implemented through an Environmental Covenant signed by Safety-Kleen and WVDEP and recorded on September 15, 2015. As indicated above, WVDEP is in the process of renewing the RCRA TSD permit and is anticipated to issued it in Q4 2024.

Long-Term Stewardship Site Visit: The EPA Region 3 and WVDEP conducted an LTS site visit in March 2019. EPA requested that this LTS assessment visit be conducted by WVDEP, which was completed on August 7, 2024, with the cooperation of Safety-Kleen personnel listed below. The attendees were:

Name	Organization	Email Address
Kenan Cetin	WV Department of Environmental Protection (WVDEP)	Kenan.Cetin@wv.gov
Hiral Kukkillaya	WVDEP	Hiral.Kukkillaya@wv.gov
Michael Hofe	WVDEP	Michael.P.Hofe@wv.gov
Johnsely Cyrus	WVDEP	Johnsely.Cyrus@wv.gov
Timothy Johnson	Safety-Kleen Systems, Incorporated	Timothy.Johnson@Safety-Kleen.com
Terri Cowans	Safety-Kleen Systems, Incorporated	Terri.Cowans@safety-Kleen.com

Institutional Controls (ICs) Status:An Environmental Covenant recorded in September 2015 is the method for implementing institutional controls required at the facility as a condition of the Statement of Basis and Final Decision. The following ICs apply at the Safety-Kleen facility (Figure 1).

Groundwater Use Restriction: Groundwater at the Facility property shall not be used for any purpose other than the monitoring or remediation activities required by WVDEP and EPA. Via email on May 28, 2018, Safety-Kleen representative Mr. Stephen Fleming confirmed that the City of Wheeling Water Department provides potable water to the Facility. There is one onsite well that provides non-potable water to the Facility. Warning signs which read “Do not drink the water” were observed in Facility restrooms.

General Property Use: The Property shall not be used in a way that will adversely affect or interfere with the integrity and protectiveness of the final remedy as set forth in the FDRTC. The Facility remains under continued use as an accumulation center for spent solvents.

Well Installation Restriction: No new wells shall be installed on Facility property unless it is demonstrated to EPA, in consultation with WVDEP, that such wells are necessary to implement the final remedy and EPA provides prior written approval to install such wells. There were no new wells or well drilling observed during the site visit.

Groundwater Monitoring - Monitored Natural Attenuation (MNA):

Nine (9) onsite groundwater monitoring wells have been installed at the facility (Figure 2). Wells MW-1, MW-2, MW-3, and MW-4 were installed in 1993. Wells MW-5 and MW-6 were installed in 2012, and wells MW-7, MW-8, and MW-9 were installed in 2013. The wells were gauged and sampled semi-annually since installation until 2021, when approval was granted by EPA to reduce monitoring frequency to annually. On February 24, 2022, EPA approved a Facility request to remove wells MW-1, MW-2, MW-3 and MW-4 from the sampling program. Therefore, only five (5) of the nine (9) wells (Figure 3) are currently being sampled and analyzed for VOCs, including tetrachloroethylene (PCE) and trichloroethylene (TCE).

The concentrations of PCE and TCE over the last five (5) years (Table 1) show that the detected levels are above the West Virginia Groundwater Quality Standards (WVGWQS) in all the wells, with MW-5 exhibiting the highest dissolved phase concentrations, which is closest to the tank farm and consistent with historical data.

Table 1: Recent analytical results for TCE & PCE, the main Facility contaminants

TCE Results*	Oct. 2020	July of 2021	MAY of 2022	MAY of 2023	MAY of 2024
MW-5	12	10 / <15U	9.7J / 13 (dup)	7.2J / <10U	<20U
MW-6	22	14	15	<25U	19J / 17J
MW-7	12	12	14	<25U	14J
MW-8	<5	5.4	2.3	2.3	2.4
MW-9	<5	2.9	7J	<10U	9
PCE Results*	Oct. 2020	July of 2021	MAY of 2022	MAY of 2023	MAY of 2024
MW-5	500	190 /130(dup)	370/200(dup)	330F1/330	680F1
MW-6	130	140	250	280	220 /230 (dup)
MW-7	260	150	330	210	410
MW-8	48	28	37	40	37
MW-9	73	27	120	33	250E
*in µg/L WVGWQS for TCE= 5 µg/L WVGWQS for PCE= 5 µg/L					

Monitoring wells with elevated PCE and TCE concentrations in groundwater are located near the western boundary adjacent to the Facility's tank farm. Recent sampling results show that while PCE and TCE groundwater concentrations exceed their respective WVGWQS in most of the monitoring wells and over most of the years, the concentrations are stable. The groundwater impacts are isolated and limited to the area west of the tank farm. However, there is some uncertainty about whether these impacts are fully contained within the Facility property boundary. Safety-Kleen will continue to monitor the facility groundwater on an annual basis, and any uncertainty regarding potential offsite impacts will be commented on and addressed during the review of annual Corrective Action Reports.

Engineering Controls (ICs) Status: There are no engineering controls required as part of the remedy. Nevertheless, this is a facility secured by a chain link security fence with barbed wire and controlled entry.

Reporting Requirements/Compliance: Safety-Kleen is required to submit an Annual Corrective Action report summarizing annual sampling and analysis results. The latest report was received on August 7, 2024. Safety-Kleen also submits annual environmental covenant compliance

inspection reports. No transfer of property, change in use of the property, or work that will affect contamination at the property has been reported, or anticipated according to facility personnel present during the visit.

Financial Assurance (FA): There are no FA requirements for Corrective Action (CA) at the Facility in line with the EPA determination in the final remedy. The Facility RCRA Permit, which is currently being renewed and will be issued soon, also will not require FA for CA at the Facility. However, the new Permit includes robust language to require the permittee for a demonstration of FA if future conditions change and necessitate significant additional corrective action activities.

Mapping: The facility map is accurate and includes the 4-acre Safety Kleen facility in its entirety (Figure 1).

Conclusions and Recommendations: As a result of this visit, WVDEP has determined that all remedy components as described in the Final Decision, including ICs and ECs, continue to be fully implemented. Given the persistent contamination (i.e., non-decreasing PCE concentrations over 12 years) and the proximity of Wheeling Creek to the contaminant plume, it would be prudent to assess the effectiveness of MNA and the potential migration of contaminated groundwater. This assessment would determine if additional remedial actions are necessary and would be in line with the requirements of the new Permit to be issued soon.

Attachments:

Figure 1: Geospatial Map of Safety-Kleen, Inc. Wheeling Facility

Figure 2: Site map showing all nine (9) groundwater monitoring wells

Figure 3: Monitoring Wells MW-009 and MW-008 in the distance

Figure 4: Close up of Monitoring Well MW-009

Figure 5: Close up of Monitoring Well MW-008

Figure 6: Close up of Monitoring Well MW-007

Figure 7: Close up of Monitoring Well MW-006

Figure 8: Close up of Monitoring Well MW-005

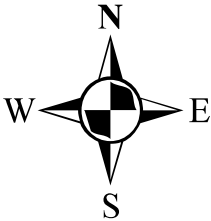
Figure 9: Well field showing six wells, including all five (5) currently sampled wells.



Figure 10: Facility Tank Farm and loading pad (looking west)

Figure 11: Concrete tank farm containment and Outfall #1



Safety-Kleen Systems, Inc.
10 Industrial Park
Wheeling, WV
EPA ID # WVD981034101



-  ENTIRE_FACILITY
-  Parcel Boundaries

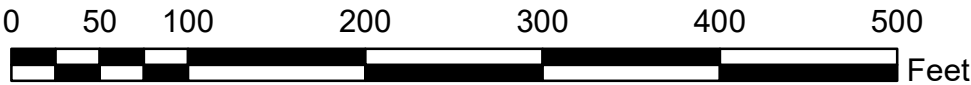
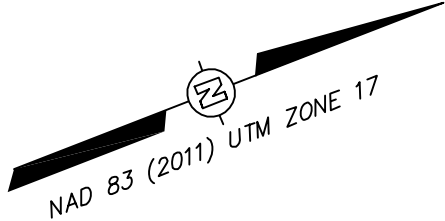


Figure 1: Geospatial Map of Safety-Kleen, Inc. Wheeling Facility

File: \\P:\pfs01\cad\Shaw Offices - CAD Files\Shaw-Kleen\NY\Safety-Kleen\156008\156008-B5.dwg
Plot Date/Time: Jan 29, 2020 - 9:42am
Plotted By: Evan.Schlegel

OFFICE	DATE	DESIGNED BY	DRAWN BY	CHECKED BY	APPROVED BY	DRAWING NUMBER
Pittsburgh, PA	1/29/18	--	E. Schlegel	--	--	156008-B5



- LEGEND:**
- EXISTING MONITORING WELL
 - PIEZOMETER LOCATION
 - LIGHT POST
 - HYDRANT
 - SAN. SEWER MANHOLE
 - CATCH BASIN / STORMWATER INLET
 - PROPERTY LINE
 - CHAIN LINK FENCE

REFERENCE:
DRAWING MODIFIED FROM CB&I DRAWING NO. 156008-B1, DATED 1/14/17, AND SAFETY KLEEN SYSTEM, INC. DRAWING NO. 7045-SPOO-002, REV. B, DATED 8/17/2015.



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SAFETY-KLEEN SYSTEMS, INC.	
FIGURE 2 SITE MAP WHEELING SERVICE CENTER 10 INDUSTRIAL PARK DRIVE WHEELING, WEST VIRGINIA	

Figure 2: Site map showing all nine (9) groundwater monitoring wells



Figure 3: Monitoring Wells MW-009 and MW-008 in the distance.



Figure 4: Close up of Monitoring Well MW-009.



Figure 5: Close up of Monitoring Well MW-008.



Figure 6: Close up of Monitoring Well MW-007.



Figure 7: Close up of Monitoring Well MW-006.



Figure 8: Close up of Monitoring Well MW-005.



Figure 9: Well field showing six wells, including all five (5) currently sampled wells.



Figure 10: Facility Tank Farm and loading pad (looking west).



Figure 11: Concrete tank farm containment and Outfall #1.