Department of Toxic Substances Control

The mission of the Department of Toxic Substances Control is to provide the highest level of safety, and to protect public health and the environment from toxic harm.

State of California

Cal/EPA

Fact Sheet, March 2009

Change in Preliminary Design of Soil Vapor Extraction System for Rho-Chem Facility, Inglewood, CA

This fact sheet is to inform the community of changes made in the preliminary design of the Soil Vapor Extraction (SVE) system after the approval of the Interim Measures Work Plan (IM Plan).

The IM Plan submitted by Rho Chem, LLC facility, approved by the Department of Toxic Substances Control (DTSC) in June 2007 for installing a SVE system anticipated the use of thermal and catalytic oxidation to treat volatile organic compounds (VOCs) extracted from soil vapor. During the detailed design of the treatment system, an alternative treatment technology, referred to as a refrigerated condensation method, was identified as a technology that would be better suited to treat the extracted VOCs.

DTSC has approved this change. Detailed design of the SVE system is underway, and is scheduled to begin operation by Spring 2009.

This fact sheet contains information on:

- Facility background
- Corrective Action Program
- Change in Interim Measure
- California Environmental Quality Act
- Project contacts

Facility Background

The facility is located on a 1.1-acre parcel at 425 Isis Avenue in Inglewood, California in a predominantly industrial and commercial area.

The facility recycles solvents and is classified as a Resource Conservation and Recovery Act (RCRA)-equivalent Hazardous Waste Management Facility. RCRA is a federal law that regulates the use, treatment, storage, and disposal of hazardous waste.

In September 1990, DTSC granted a Hazardous Waste Facility Permit that allowed the facility to transfer, treat, and store hazardous waste. The facility consists of an approximately 3,300 square foot, one story building that houses administrative offices, a laboratory, drum storage areas and aboveground storage tanks (ASTs); with additional ASTs and another drum storage area located outside the building.

The facility (formerly known as American Better Chemical Company) began operations about 1953. Initial operations included the bulk storage and distribution of oils, lubricants, and solvents. The facility began recycling waste solvents in 1964. The facility, renamed Rho-Chem Corporation in 1974, added repackaging and distribution of virgin solvents to its operations and continued waste solvent recycling activities. In 2008, the name of the facility was changed to Rho-Chem, LLC.

Currently the facility operations and services include liquid fuel blending, solvent recycling (fraction distillation and thin film evaporation), and solvent distribution. The facility also accepts solid waste for fuel blending.

Residues from the solvent recycling operation are incorporated into the fuel blending process. Emissions from the tank farm areas, bottling, drumming, and truck unloading and loading operations are captured and routed to an on-site vapor control system.

The facility currently utilizes three drum-storage areas (with a total permitted storage capacity of 1080 waste drums) and twelve ASTs (with a total capacity of 88,000 gallons) for waste storage and treatment. Eleven ASTs (with a total storage capacity of 80,000 gallons) are used to store virgin and recycled solvents.

Corrective Action Program

Corrective action refers to the investigation and cleanup process at a hazardous waste site. The California Health and Safety Code and RCRA require corrective action for all releases of hazardous wastes or constituents from a facility engaging in hazardous waste management, regardless of when the waste was released.

Following is a summary of the work done at the facility since the Corrective Action process was initiated in 1988:

An **RCRA Facility Assessment (RFA)** was conducted in late 1988. The assessment identified 36 Solid Waste Management Units (SWMUs) and 3 additional Areas of Concern (AOCs).

An **RCRA Facility Investigation (RFI)** indicated that the soil beneath the facility was contaminated primarily by chlorinated and non-chlorinated VOCs. These compounds included: acetone, 1,1-dichloroethane (1,1-DCA), 1,2-dichloroethane (1,2-DCA), 1,1-dichloroethene (1,1-DCE), ethyl benzene, methylene chloride, methyl ethyl ketone (MEK), methyl isobutyl ketone (MIBK), tetrachloroethene (PCE), 1,1,1-trichloroethane (1,1,1-TCA), trichloroethene (TCE), and toluene. These compounds are principally used as industrial solvents or degreasers.

VOCs are present in groundwater at a depth of about 100 feet below the ground surface. The primary VOCs detected in groundwater include TCE and PCE.

Interim Corrective Measures

An Interim Corrective Measure is a cleanup action taken to protect public health and the environment while long-term solutions are being developed.

The IM Plan describes the interim measure using a SVE system to clean-up the contaminated soil at the facility. A public notice of the proposed IM Work Plan was announced in the local newspapers and a thirty-day public comment period was held from October 23, 2006 through November 21, 2006. Following the completion of the public comment period, the DTSC approved the IM Plan with conditions.

The IM Plan approved by DTSC in June 2007 proposed installing an SVE system at the facility to mitigate VOC contaminated soil at the site and along the site boundaries. The SVE system was designed to extract soil vapor from the zone

between land surface and the water table (vadose zone).

The preliminary design in the IM Plan anticipated the use of thermal and catalytic oxidation to treat VOCs extracted from soil vapor. During the detailed design of the treatment system, an alternative treatment technology, referred to as a refrigerated condensation method, better suited to treat the VOCs was identified.

DTSC approved the proposed change in the SVE treatment technology because the refrigerated condensation system would be used for the recovery and recycling of VOCs. This technology is effective, reliable, cost efficient, easy to implement and it is more protective of human health and the environment because it eliminates the emissions from the thermal/catalytic treatment.

Additional information on the SVE can be viewed at: http://sve.ucdavis.edu/index.htm

California Environmental Quality Act (CEQA)

The approval of the IM Plan is a discretionary, regulatory decision. CEQA requires that DTSC analyze and consider the potential impacts of a remedy before making a final decision. Pursuant to CEQA, the DTSC issued a Negative Declaration in June 2007 for the preliminary design that includes thermal or catalytic oxidation treatment. That Negative Declaration states that the project will **not** have significant effect on human health or the environment. The CEQA analysis for the preliminary design remains valid since the replacement of the thermal/catalytic oxidation design element by the refrigerated condensation system further reduces any potential impacts on the environment by elimination of combustion product emissions from the air cumulative impacts analysis.

Future Activities

The future corrective action activities to be conducted by the facility and DTSC include the following.

- The facility will continue the assessment of VOC contaminated groundwater following the DTSC-approved work plan. Groundwater monitoring wells are being installed on the site and at off-site locations.
- Upon the completion of groundwater studies, the facility will conduct a Corrective Measures Study (CMS), which will propose remedies to reduce the risk of exposure, and submit a CMS Report to DTSC for review and approval.
- DTSC will review and consider the potential impacts of the proposed remedies pursuant to CEQA.
- DTSC will provide the public an opportunity to comment on the proposed remedies and environmental review. DTSC will consider all comments before making a final decision.
- DTSC will approve the remedies that are most protective of human health and the environment, based on performance, feasibility, cost, and other factors.
- The facility will implement and maintain the remedies selected.

Where to find the Documents

The key technical documents are available for review at the following locations:

Inglewood Public Library
101 W Manchester Blvd
Inglewood, California 90301
Contact: Reference Desk
Phone: (310) 412-5380
Monday-Thursday: 10:00 a.m. – 8:00 p.m.
Friday: 10:00 a.m. – 6:00 p.m.
Saturday: 10:00 a.m. – 6:00 p.m.
Sunday: 1:00 p.m. – 5:00 p.m.

The Administrative Record pertaining to this project is available for review at:

DTSC Regional Records Room
9211 Oakdale Avenue
Chatsworth, California 91311
Phone: (818) 717-6621
Contact: Viven Tutaan for an appointment
Monday – Friday: 8:00 a.m. to 5:00 p.m.

For More Information

If you need more information or have any question regarding the project, please contact the following DTSC representatives:

Richard Allen
Project Manager
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Maya Akula
Public Participation Specialist
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DTSC Toll Free #: 1-866-495-5651, press 3 then 1

Media Inquiries:

Jeanne Garcia
Public Information Officer
(818) 717-6573 or JGarcia1@dtsc.ca.gov

Visit our web site: www.dtsc.ca.gov

Notice to Hearing Impaired

You can obtain additional information by using the California State Relay Service at: 1(888) 877-5378 (TDD). Ask them to contact Maya Akula at 1(818) 717-6566 regarding the Rho-Chem project.