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U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 SIXTH AVENUE
SEATTLE, WASHINGTON 98101

REPLY TO
ATTN OF:

SUBJ: Action Memorandum - Removal, ARRCOM Corporation facility, Kootenai County, Idaho.

TO: Charles E. Findley, Director, Hazardous Waste Division

FROM: James C. Willmann, Chief, Superfund Removal and Emergency Section

THRU: Phillip Millam, Chief, Superfund Branch

DATE: April 13, 1987

1. PURPOSE

The purpose of this removal action is to mitigate adverse effects from the spillage and leakage of waste oil and contaminant organic compounds at the ARRCOM facility. Potential sources of leakage and further contaminant dispersal include the contents of tanks and 55 gallon drums. The action will complete a previously initiated cleanup activity at the site which was terminated due to funding restrictions. The goal of this cleanup activity will be to prepare the site for de-listing from the National Priority List.

2. BACKGROUND

The abandoned ARRCOM Corporation (Drexler Enterprises, Inc.) facility, is located approximately 2.8 miles southwest of Rathdrum, Idaho on the north side of Highway 53 in a rural, residential neighborhood (Figure 1). ARRCOM engaged in the recycling of waste oil until the operation was abandoned in January 1982.

Numerous studies and sampling activities conducted by Region 10 personnel through September 1983 indicated that the oils recycled by ARRCOM were contaminated by a variety of organic solvents. Analytical results from survey sampling indicate the presence of a variety of hazardous compounds. The most commonly reported compounds and their respective highest reported concentrations were chloroform (1 ppm), benzene (100 ppm), toluene (11,000 ppm), total xylenes (103,000 ppm), acetone (460 ppm), methylene chloride (130 ppm), tetrachloroethene (330 ppm), ethyl benzene (44,000 ppm), and polychlorinated biphenyls (PCBs). Analytical results from soil samples collected on-site supported visual observations that a number of the storage tanks had leaked and/or were in a deteriorated condition.

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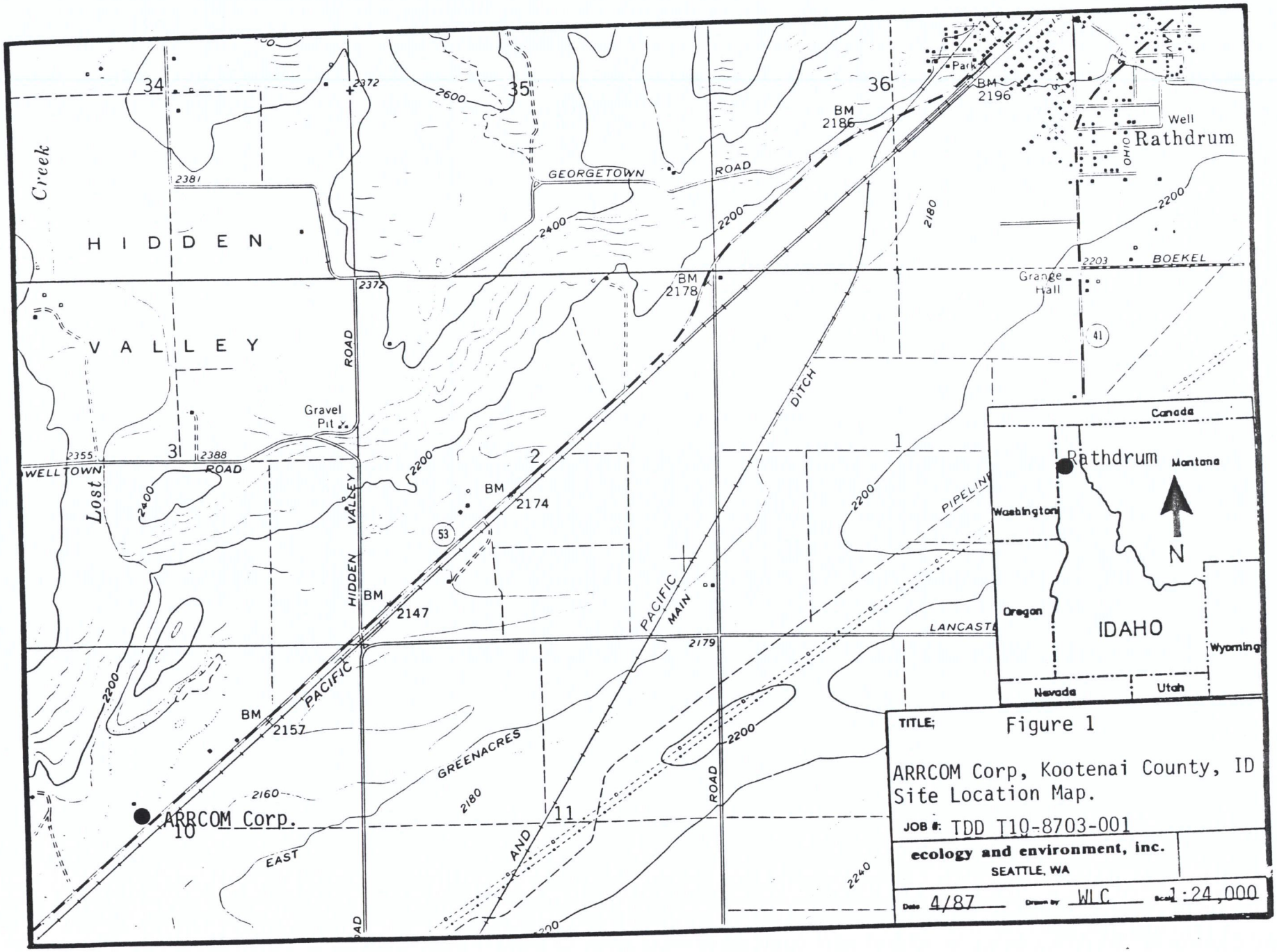

TITLE: Figure 1

ARRCOM Corp, Kootenai County, ID
Site Location Map.

JOB #: TDD T10-8703-001

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3. THREAT

The 1.2-acre site is located over the Spokane Valley Rathdrum Prairie aquifer which has been designated as the "sole source aquifer" for the Spokane River Valley. The aquifer provides drinking water for approximately 350,000 people and is heavily utilized for crop irrigation.

Local well logs indicate that the static water level is encountered approximately 135 feet below ground surface. The aquifer and the unsaturated zone above the aquifer are composed primarily of permeable, glaciofluvial outwash and Missoula Flood deposits (sands and gravels with some coarse rock). Water-well yields of several hundred to several thousand gallons per minute are common. The transmissivity of the aquifer has been calculated to be approximately 60 feet/day, indicating a potential for rapid migration should contaminants reach the aquifer.

Included in the 350,000 people who derive their drinking water from the aquifer is an estimated 6,300 people who are served by both public and private drinking water wells located within a three mile radius of the facility. The closest residence is located immediately adjacent to the facility, on the north side of the site. This residence, like most others in the area, relies on a private well for its drinking water supply. Ground water samples collected from several wells in the immediate vicinity of the site in June 1983 were not contaminated.

The site is unfenced and is not secured from public access or tampering. Due to the remote nature of this site, vandalism and children playing on equipment is possible.

4. EPA INVOLVEMENT AT THE ARRCOM, CORP. FACILITY

The site was declared an immediate threat to the public health and welfare by the EPA in August 1983 based on the following information:

1) the site overlies an unconfined, sole source aquifer;

2) analytically verified, on-site contaminants were known to be of high toxicologic significance;

3) there was a strong possibility of ground water contamination;

4) on-site storage tanks were in a deteriorated and/or leaking condition; and,

5) the site was abandoned, and not secured from vandalism.

Once it was determined that the responsible party would not perform the required cleanup, an immediate removal action was ordered by the EPA Region 10 Regional Administrator under CERCLA section 106.

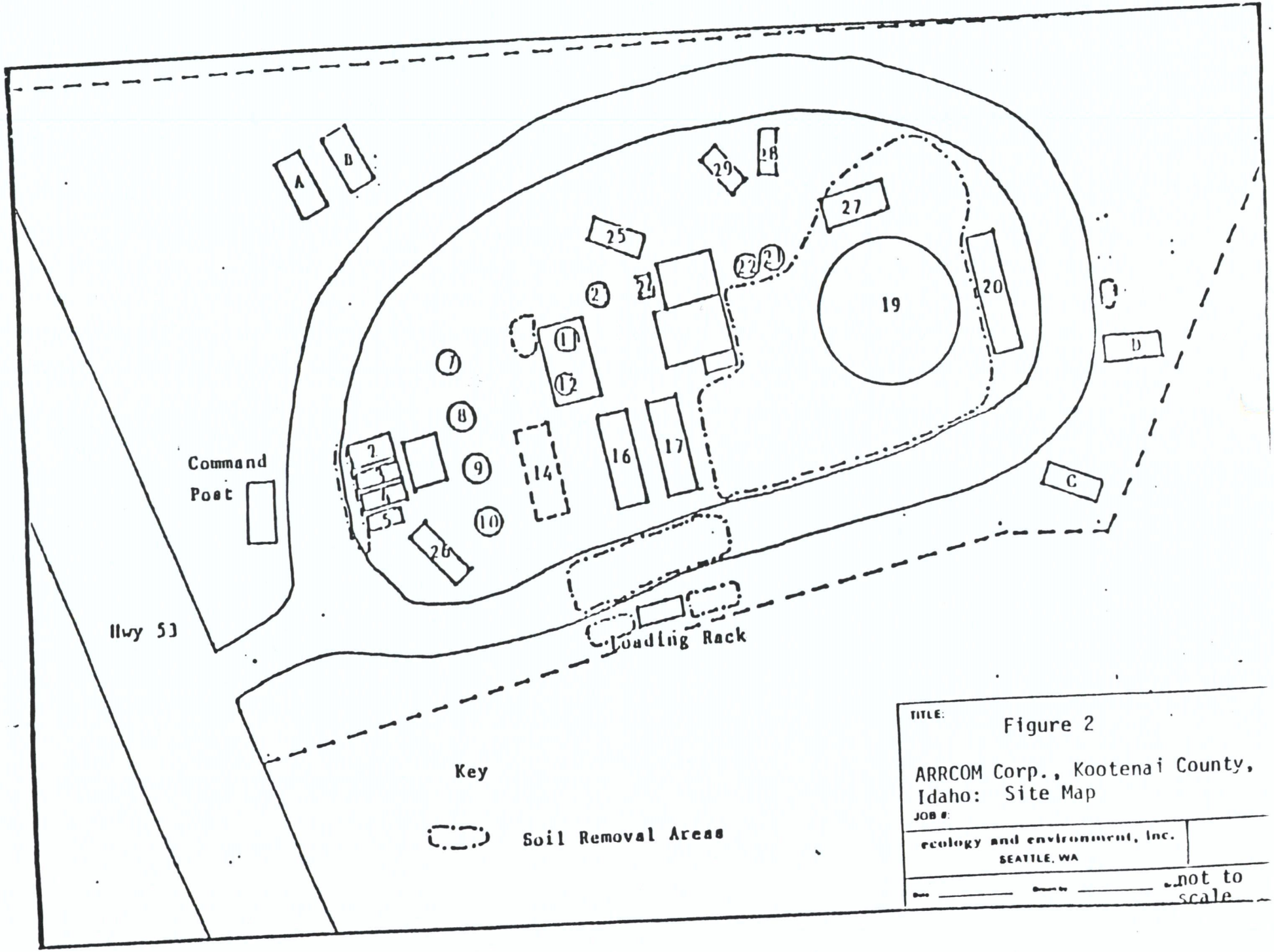
Cleanup operations proceeded for four days, beginning September 18 and continuing through September 21, 1983. An estimated 9,700 gallons of contaminated waste oil were pumped from 23 on-site tanks and 3 trucks, and shipped to the Crosby and Overton facility in Kent, Washington for treatment and disposal. Three 55-gallon drums containing PCB contaminated material from one tank (Figure 2, Tank T-5), and the kerosene rinsate from the cleaning of that tank were shipped to the ENSCO facility in Eldorado, Arkansas for incineration. An estimated 137 cubic yards of contaminated soils were disposed of at Envirosafe Services of Idaho, in Grand View, Idaho. Small containers were left in a locked, on-site shed, and unpumpable sludges were left in the tanks and trucks.

The total cost of the 4-day cleanup operation was approximately $70,000. This included contractor cleanup costs, EPA and Coast Guard costs, and other recoverable expenses.

On February 3, 1987, and again on March 12, 1987, the Region 10 Technical Assistance Team (TAT) conducted site surveys at the ARRCOM facility. The purpose of these surveys was to gather the additional information needed to develop strategies for sampling the remaining contents of the on-site tanks and trucks and to collect additional details needed to plan a complete removal operation. The TAT conducted a 3-day sampling and inventorying operation at the facility from March 23 through March 25, 1987. All of the tanks and trucks were sampled and visual descriptions of the contents were recorded in the field log book. It was noted that two of the tanks (T-21 and T-22) appeared to have been refilled with waste oil since the completion of the first phase of the removal operation. Recent spillage from 55 gallon drums of unknown tarry material was noted in several loctions. A composite sample was formed from the individual tank/truck sludge and oil samples and analyzed by a Seattle-area laboratory to ascertain specific characteristics of the wastes. The analytical results will be used to determine transportation and disposal and/or treatment requirements for the wastes.

5. PROPOSED PROJECT AND COST

The SRES proposes to complete the cleanup activities at the ARRCOM Corporation facility now that adequate funding is available. The goal of this proposed activity is to reduce or eliminate the sources of contamination at the site such that the site will qualify for de-listing from the National Priorities List.



TITLE: Figure 2

ARRCOM Corp., Kootenai County, Idaho: Site Map

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not to scale

The following tasks are proposed to complete the removal of wastes, stabilize the site, and remove the public exposure threat from contaminants at the site:

- Remove the contaminated oils and sludges from the tanks and trucks.

- Conduct an extent-of-contamination survey throughout the site to determine which soils need to be excavated and which surfaces need to be decontaminated. This survey will utilize field screening analytical techniques and will be repeated as necessary throughout the cleanup operation to verify the thoroughness of the cleanup efforts.

- Decontaminate (preferably by steam cleaning) all on-site structures (tanks, trucks, buildings, foundations, etc.).

- Excavate and remove the contaminated soils on the site after all structural decontamination has been completed.

- Arrange for the incineration of waste oils and sludges, and for the proper disposal of all other contaminated and non-contaminated cleanup-derived wastes.

- Following verified decontamination, dispose of all on-site tanks, trucks, furnaces, etc., either through sale to local interests or through other recycling or disposal alternatives.

- Demolish and properly dispose of existing on-site structures and foundations.

- Regrade and refill, as necessary, to return the site to safe condition.

- Conduct on-site monitoring and sampling, including the installation of ground water monitoring wells, to verify the absence and/or removal of the public health threat.

The estimated additional costs required to complete the effective completion of this project are:

ERCS:	$ 600,000
EPA:	$ 30,000
Coast Guard:	$ 40,000
FIT:	$ 20,000
TAT:	$ 40,000
	$ 730,000

These costs are in addition to those already obligated. The estimated completion date for the scheduled activities is June 30, 1987. The estimated total projects costs to completion are $800,000, of which $650,000 are for extramural cleanup contractor costs.

Because conditions at the ARRCOM Corporation facility meet the NCP section 300.65 criteria for removal, I recommend your approval of the removal request.

Approval: Charles Findley Date: 4/27/87

Disapproval: _____ Date: _____

Comment: Would like to discuss options for these tasks as they are better defined (costs, approach, etc). i.e. Check back in after the 1st 150,000 is spent or sooner as appropo.

CF