WAD 2302
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 9/9/2004

RCRA Corrective Action Order Compliance Report

FILE COPY

Facility Name:	Former Rhone Poulenc Facility
Facility EPA ID#:	WAD 009282 2302
Facility Location:	9229 East Marginal Way Seattle, WA
Facility Representatives:	John Ambrose, RCI Environmental Tasha Grey, Geomatrix Sarah Ruston, Geomatrix
Date of Inspection:	August 17, 2004
Date of Report:	September 9, 2004
Report Prepared by:	Shawn Blocker, SBlocker 9/9/04
Inspector(s):	Shawn Blocker, Environmental Scientist US Environmental Protection Agency 1200 Sixth Avenue, WCM-126 Seattle, WA 98101

Authority:

The United States Environmental Protection Agency (EPA) performed this Corrective Action Order Compliance Inspection of groundwater monitoring operations in support of an Administrative Order On Consent under section 3008 (h) of the Resource Conservation and Recovery Act (RCRA) between the Respondents for the Former Rhone Poulenc, Inc., facility and the U.S. EPA ("Order"). Specifically, compliance with the requirements for field groundwater elevation measurements as stipulated in the above referenced Order were observed during this inspection.

Introduction/Inspection Findings:

The facility is located at 9229 East Marginal Way in Seattle, Washington. The facility is composed of one large warehouse and one remaining 300,000 gallon above ground storage tank. Several areas of rubble and trash are also located on site. The large warehouse houses a groundwater treatment system required to be constructed as part of an interim measure

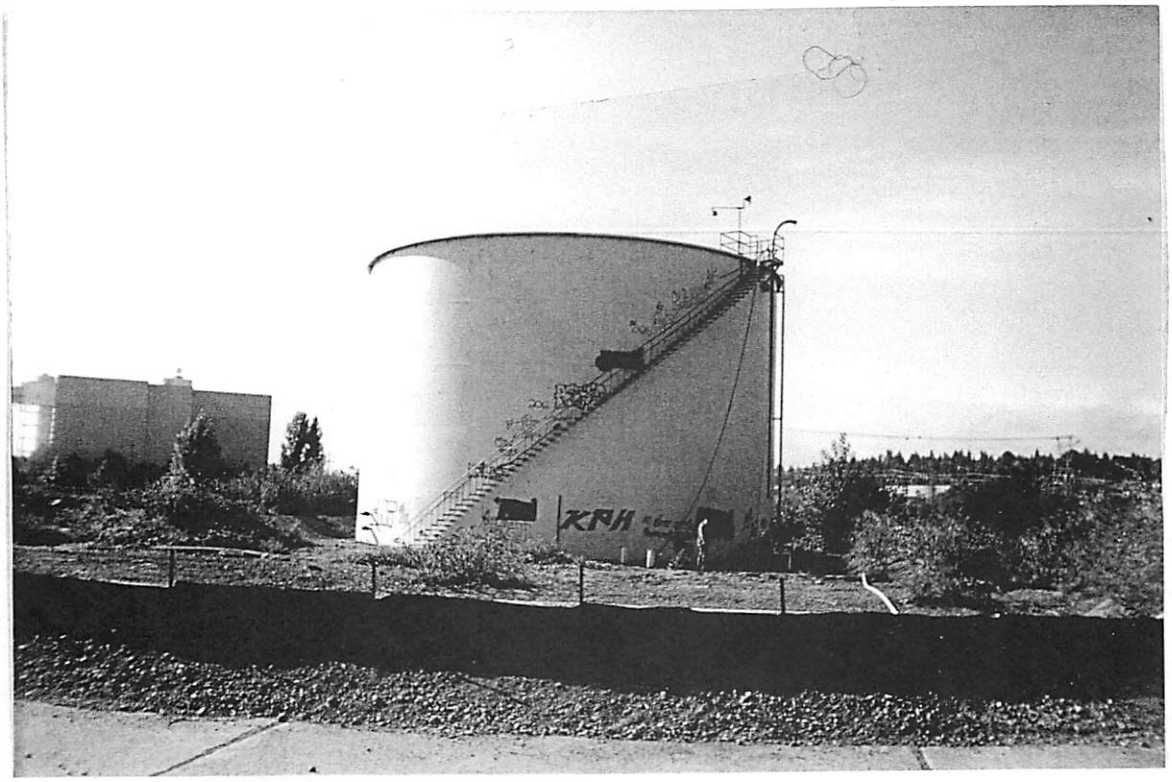
implemented at the site in the summer of 2003. During this visit, Geomatrix, a consultant for RCI Environmental, was performing groundwater elevation measurements and field groundwater quality measurements on 34 groundwater water monitoring wells located inside and outside of a impermeable barrier wall. The barrier wall and associated groundwater treatment system was installed during the summer of 2003 in support of an interim measure to migration of contaminants off site.

I arrived at the facility at approximately 8:15 a.m. and introduced myself to Mr. John Ambrose, the Health and Safety Officer for RCI Environmental. I displayed my credentials and advised Mr. Ambrose that I was here to observe the scheduled groundwater elevation monitoring event. Mr. Ambrose advised me that he was not involved in the groundwater monitoring event but was there to check the groundwater treatment system. Mr. Ambrose stated that I needed to check with the Geomatrix personnel currently on site in regards to the groundwater measurement activities. I asked Mr. Ambrose if I could view the groundwater treatment system. Mr. Ambrose agreed and escorted me into the main building. I observed what appeared to be an operating groundwater treatment system. I observed one monitor located on an influent line which indicated an approximately 11 gpm flow rate. I observed what appeared to be two carbon tanks and 2 bag filters associated with the system. A Programmable Logic Controller (PLC) appeared to be installed but I did not open the front to inspect the internal systems. I observed 3 pressure gauges in the lines of the system, but none of the gauges indicated any pressure. I could hear water moving through the system, but did not open any of the sampling valves to verify flow. I then thanked Mr. Ambrose for showing me the groundwater treatment system and exited the building.

I proceeded south in the direction of the Geomatrix sampling team. I introduced myself and displayed my credentials to Ms. Tasha Grey, field geologist for Geomatrix. Ms. Grey introduced me to her associate, Ms. Sarah Ruston. I advised both that I was there to observe their field groundwater elevation monitoring procedures. Ms. Grey then proceeded to measure wells MW-53 and MW-54. Ms. Grey utilized a Solinst Water Level Meter to conduct the measurements. Ms. Grey explained that the procedure for measurements was to measure the wells located inside the barrier wall first on the outgoing tide, then wait until the tide turned (at roughly 12:30 p.m. the day of the inspection) before measuring the wells outside the barrier wall. I observed Ms. Grey properly using the Solinst meter while measuring wells MW-53 and MW-54. Ms. Grey was properly decontaminating the sampling device between wells. Upon completion of the measurements, Ms. Grey proceeded to wells MW-55 and MW-56 and continued her measurements. During this time, Ms. Ruston was going to the well heads and removing bolted covers and preparing the wells to be monitored. At this time I noticed that a large section of fence was down adjacent slip 6 and that a section of fencing was missing along the eastern border of the site (photo 11 and 12) . I asked Ms. Grey how long the fence had been down and missing. Ms. Grey was not sure and advised me to contact representatives of RCI Environmental for that information. Upon completing he measurements at MW-55 and MW-56, Ms. Grey moved to wells MW-27 and MW 28 and proceeded to measure these wells.

At this time I noticed 4 inch PVC piping on the ground near the large above ground storage tank located on site (photo 1). Upon further inspection, I found two different PVC lines originating from the tank. One line ("Line 1") was connected to a flex hose that went up the side of the tank completely to the top (photo 2 through 4). Line 1 proceeded from the tank in a northwestern direction across a containment berm, at which time it angled 45 degrees and ran directly east into the King County Sewer Lift Station (photo 5 and 6). I observed another portion of missing fence adjacent the lift station (photo 13). The other line ("Line 2") proceeded from near the bottom the tank directly north then turned 90 degrees terminating near the berm. After inspecting Line 2, I proceeded up the stairwell of the tank to the top. At the top, I observed that the flex line associated with Line 1 proceeded down into the tank and into several feet of liquid contained within the tank (photo 7 through 9). The hose was hooked to a submersible pump (photo 9). After observing this I proceeded down the stairs toward the access gate adjacent the Duwamish waterway.

I found that the gate adjacent the Duwamish had recently had a new lock and cable placed on it. I found the cover for the new lock on the ground. From this point I walked the fence line due north to the locations of wells MW-38 and MW-39. At this location I observed micro-purging equipment adjacent the open wells. I then proceeded due east to the main entrance where I met Ms. Grey and Ms. Ruston. I asked Ms. Grey what their procedures for micro-purging were. Ms. Grey stated that they typically continued micro-purging until the field measurements (turbidity, conductivity, pH, temperature, Redox) stabilized and then recorded the results. Ms. Grey also stated that the hydrolab typically used to take these measurements had malfunctioned and they were waiting for a new one to be delivered on site. Near this location I observed that another portion of the fence was missing in the northeast corner of the site. I then told Ms. Grey that it appeared that they were sampling in accordance with protocols approved by the EPA. During the site visit, I had observed several of the monitoring well covers without bolts. I asked Ms. Ruston where the bolts were, assuming that she had removed them and placed them in central location. Ms. Ruston stated that the covers in question did not have any bolts (photo 10). I advised Ms. Ruston that the covers required bolts and that they should be installed immediately. Ms. Ruston stated that she would inform her superiors. I departed the site at 9:45 a.m.



1. Above ground storage tank.

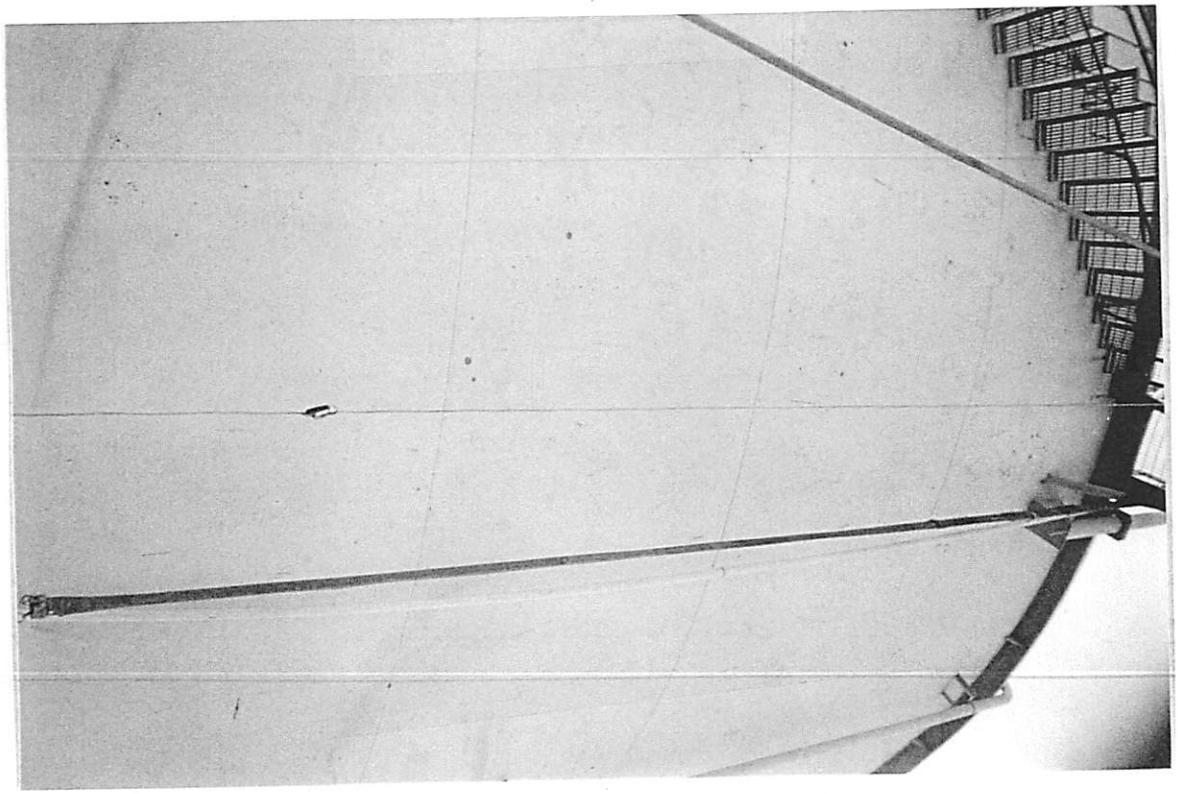
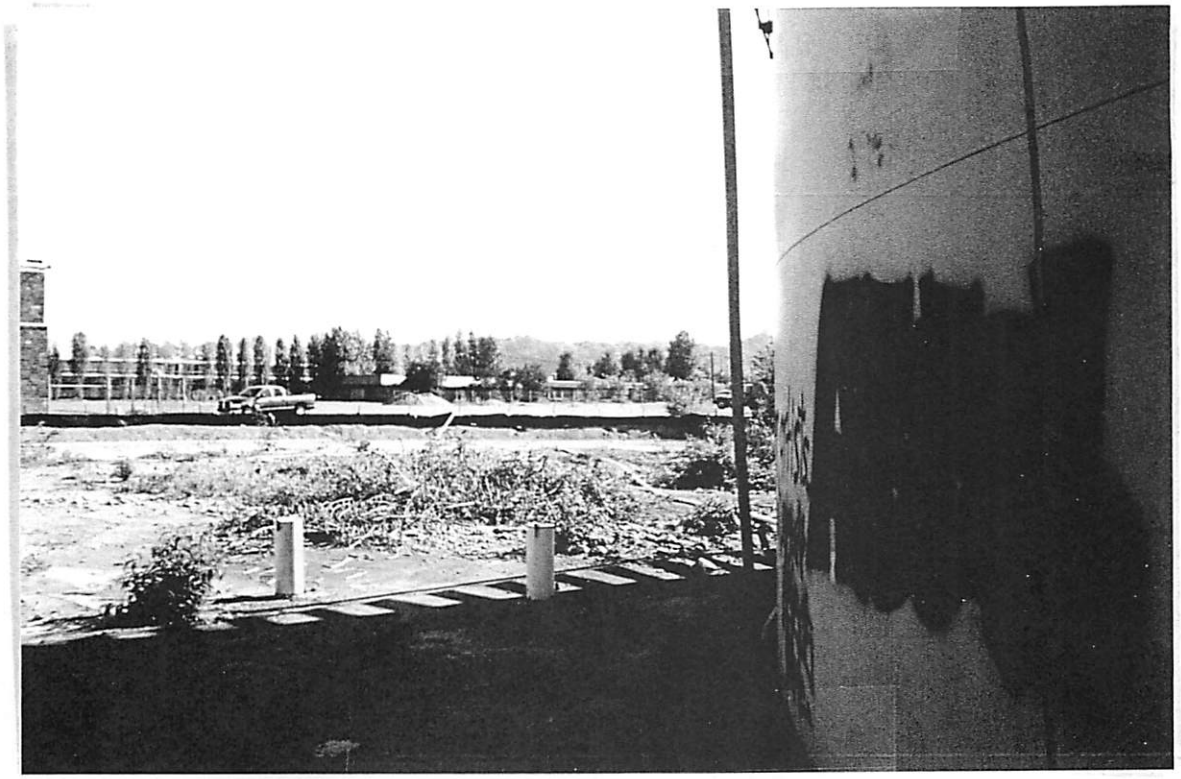


Photo 2. Flexhouse going up and into above ground storage tank.
Photo taken by Shawn Blocker, U.S. EPA
8/17/2004



3. Flexhouse going up and into above ground storage tank.

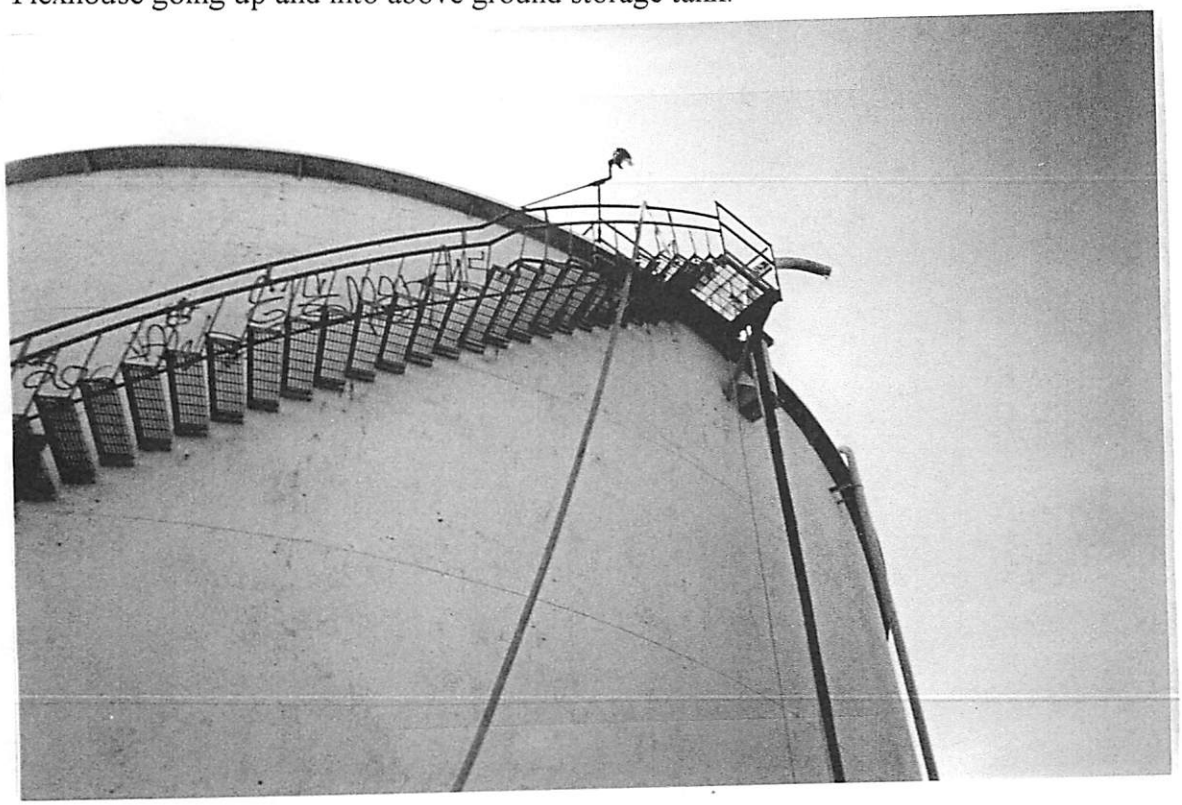
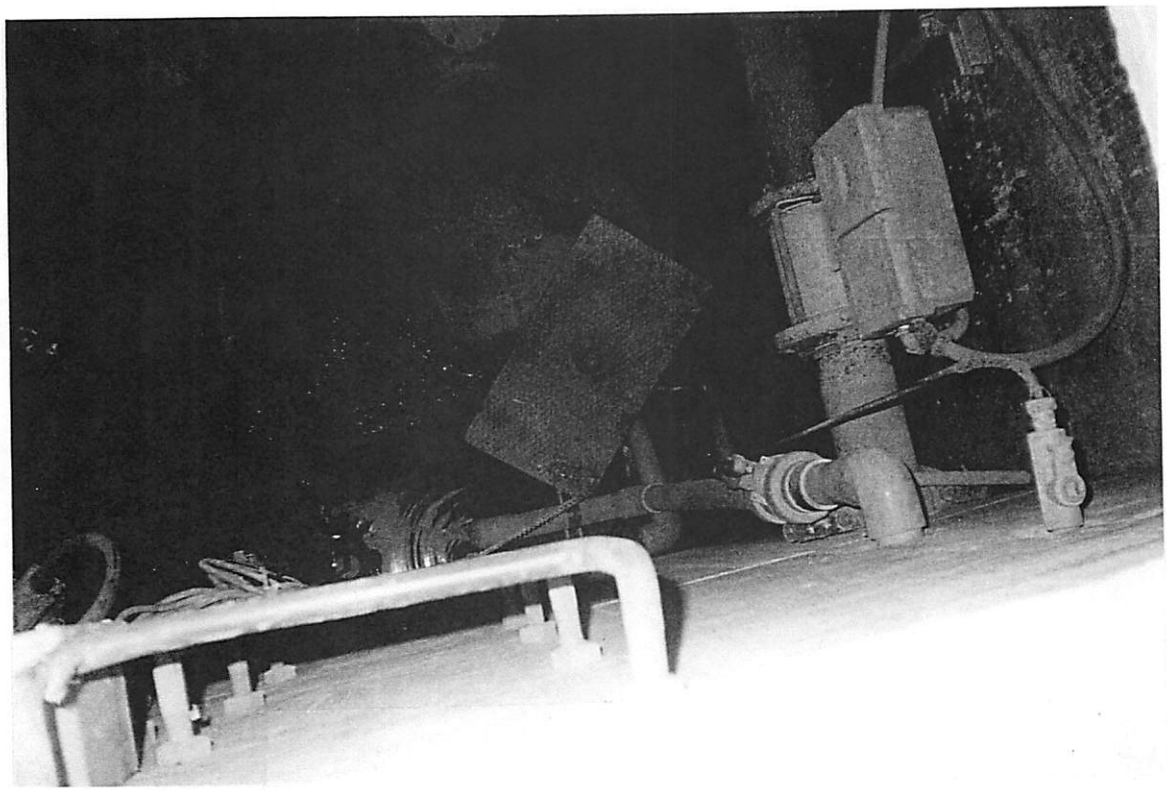


Photo 4. Flexhouse going up and into above ground storage tank.
Photo taken by Shawn Blocker, U.S. EPA
8/17/2004



5. Photo inside King County Sewer Lift Station.

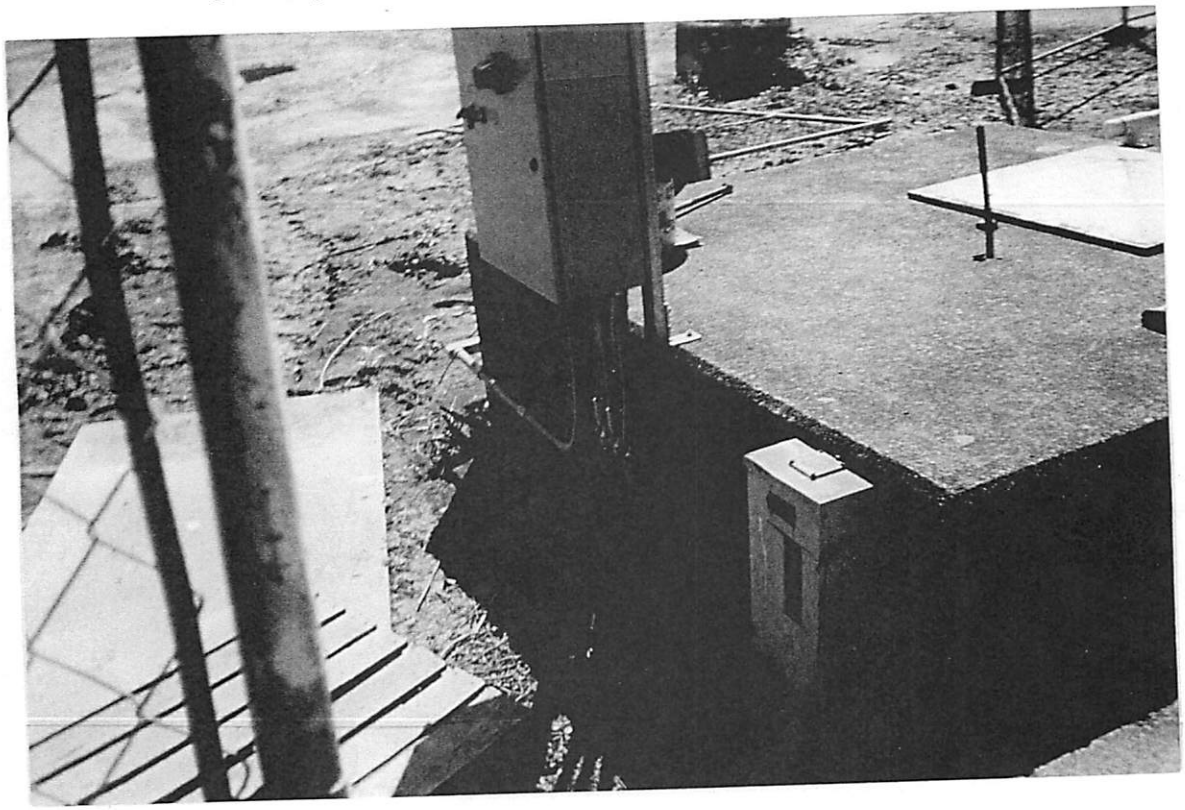
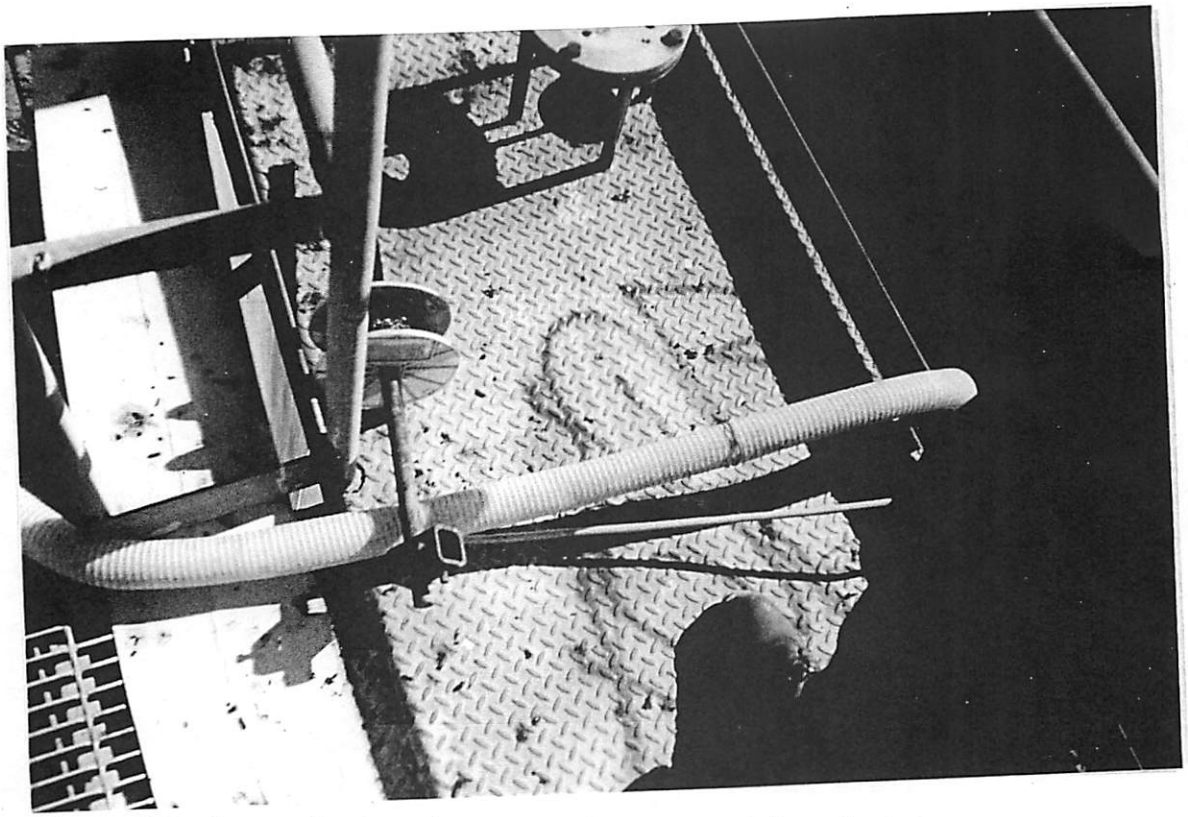


Photo 6. Photo of King County Sewer Lift Station.
Photo taken by Shawn Blocker, U.S. EPA
8/17/2004



7. Photo of flex hose going into above ground storage tank from the top.

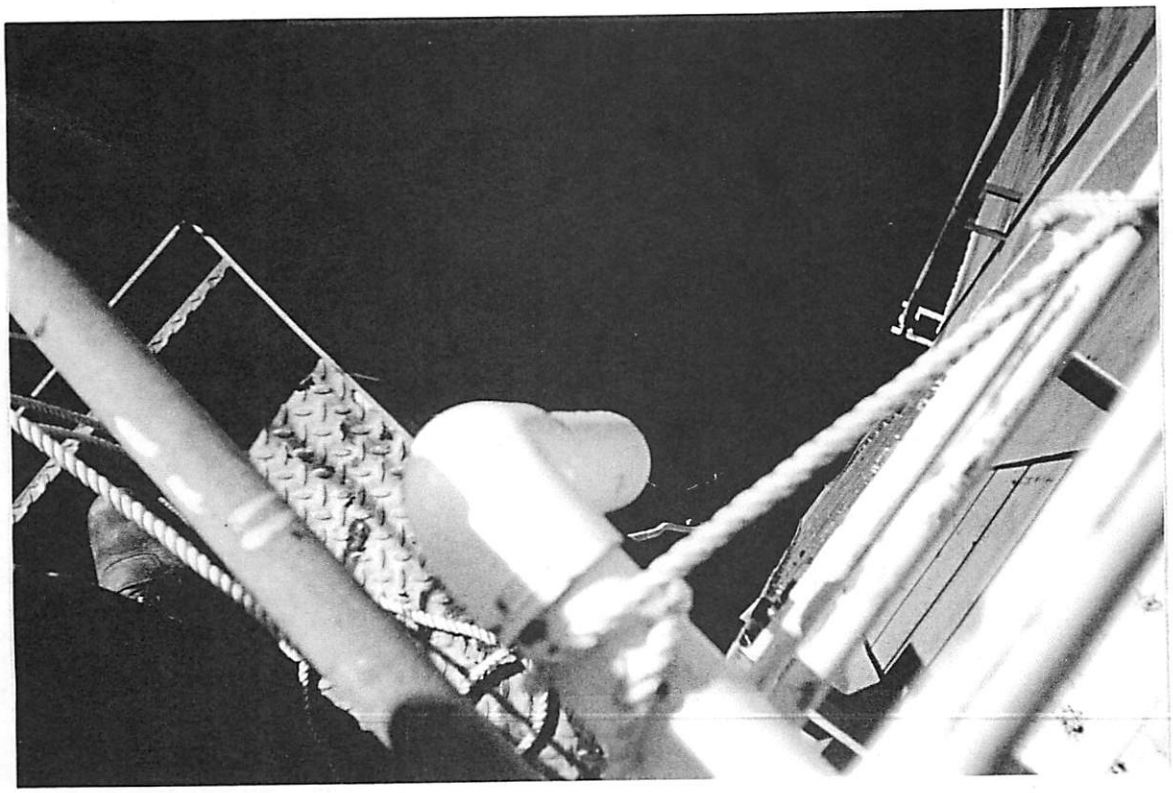
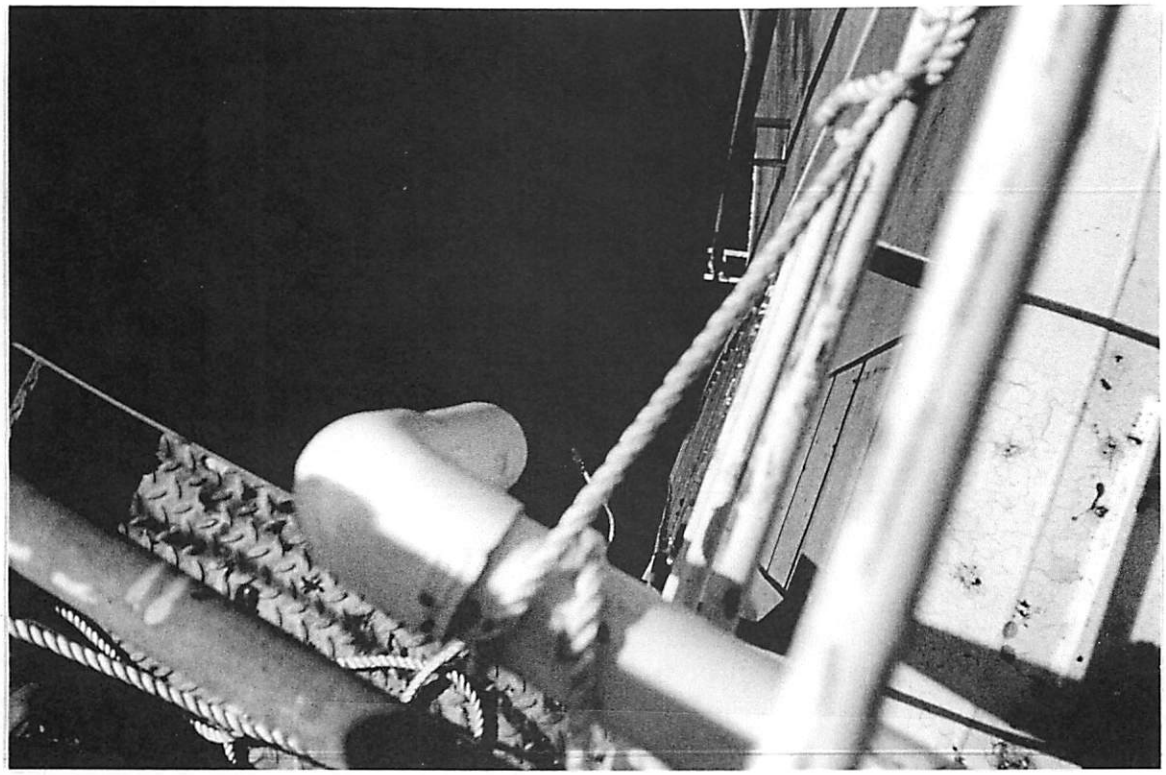


Photo 8. Photo of flex hose going into above ground storage tank from the top..
Photo taken by Shawn Blocker, U.S. EPA
8/17/2004



9. Photo of hose going into above ground storage tank from the top.

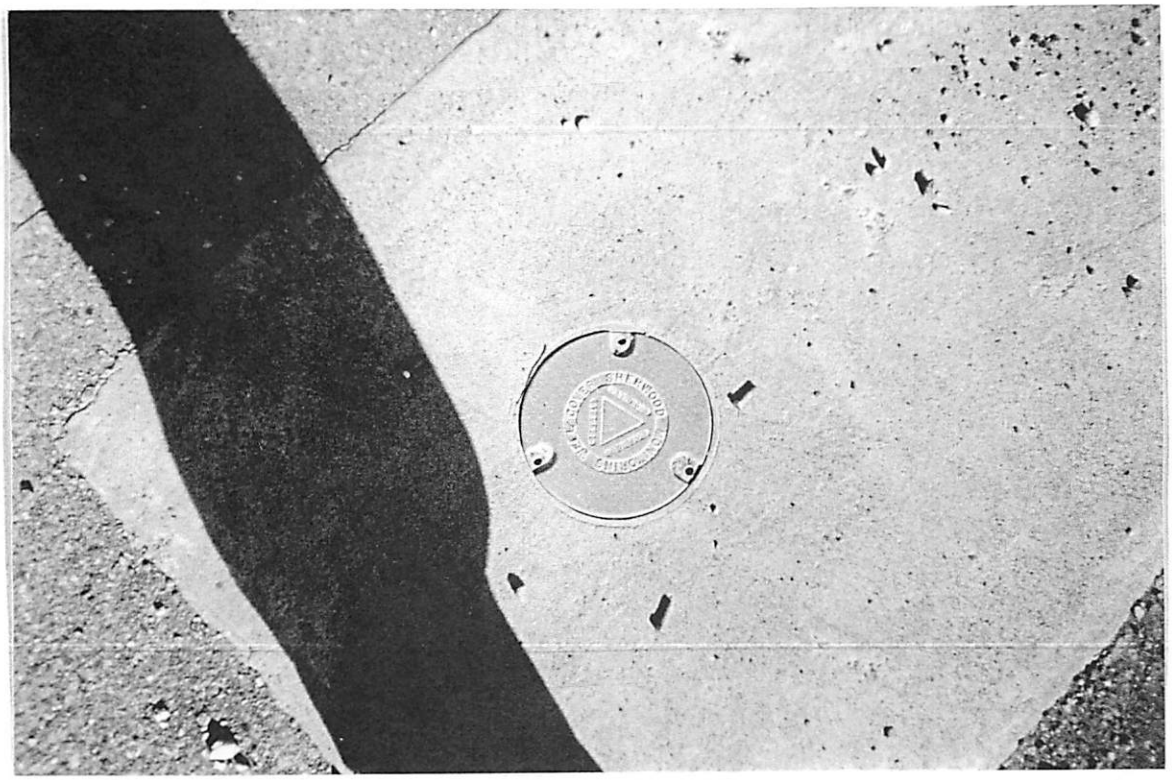
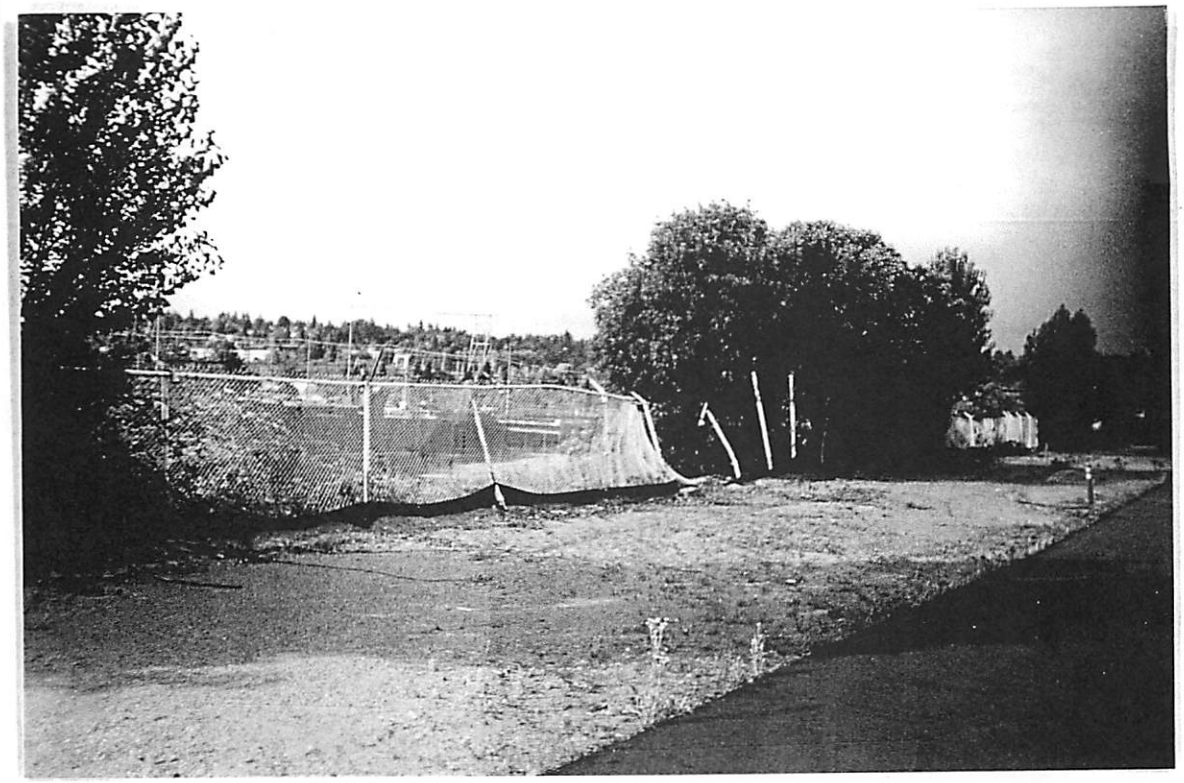


Photo 10. Photo of well cover not properly bolted down.
Photo taken by Shawn Blocker, U.S. EPA
8/17/2004



11. Missing fence along slip 6.

Photo 12. Missing fence in southeast corner of site.
Photo taken by Shawn Blocker, U.S. EPA
8/17/2004

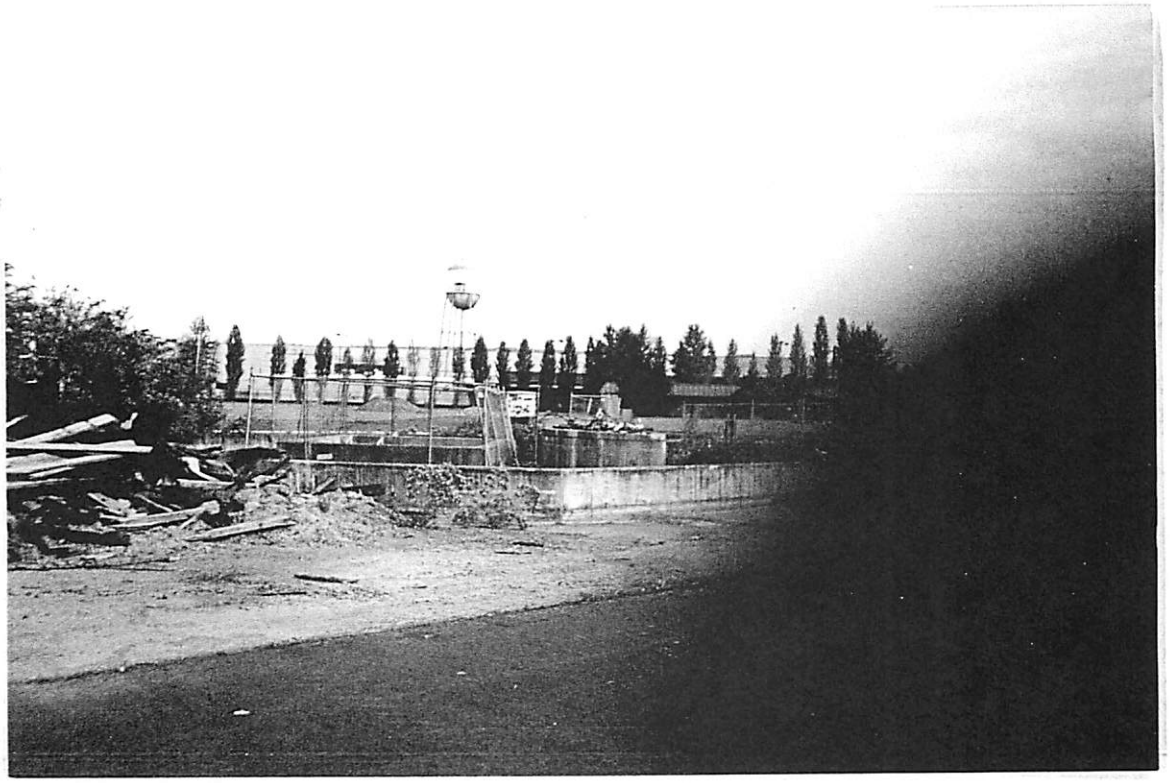


Photo 13. Missing fence near lift station.
Photo taken by Shawn Blocker, U.S. EPA
8/17/2004