STATEMENT OF BASIS/FINAL DECISION AND RESPONSE TO COMMENTS SUMMARY

REGION I
CT# 5290

SOUTHDOWN, INC.

0 Cross Street, Bristol, Connecticut
(Signature Date: July 1999)

Facility/Unit Type:	**RCRA hazardous waste storage facility**
Contaminants:	**Variety of liquid hazardous wastes including waste oils; aqueous wastes including waste oils, aqueous wastes bearing acids, heavy metals, cyanide and phenols**
Media:	**Soil, Groundwater**
Remedy:	**Implementation of a closure plan to involve the decontamination, demolition, and removal of eight underground concrete storage tanks**

FACILITY DESCRIPTION

The former Connecticut Treatment Corporation (CTC) Facility, located at 0 Cross Street, Bristol, Connecticut, was a RCRA hazardous waste storage facility. The facility was used for the storage of a variety of liquid hazardous wastes including waste oils, aqueous wastes bearing acids, heavy metals, cyanide and phenols. Eight underground concrete tanks were constructed in 1979 to accommodate these wastes; the tanks were lined with a chemical resistant epoxy sealant or fiberglass. The facility used the tanks for temporary storage before transport to CTC's Broderick Road facility, where the wastes were treated. In 1984, CECOS Treatment Corporation, now Southdown, Inc. of Houston, Texas (Southdown), purchased the Facility from CTC and continued to store aqueous wastes at the site. Active storage operations ceased in 1987.

In 1981, the Water Compliance Unit of the Connecticut Department of Environmental Protection (CTDEP) required CTC to install and monitor groundwater wells at the Facility. In 1985, the EPA completed a RCRA Facility Assessment (RFA) of the Facility, the primary purpose of which was to identify areas requiring further investigation for the possible presence of hazardous constituents. The results of the RFA caused EPA to determine that further investigation, through performance of a RCRA Facility Investigation (RFI) was necessary. Therefore, in 1986, EPA issued the Facility a Hazardous and Solid Waste Amendment (HSWA) permit which required the Facility to conduct an RFI. The RFI was completed in January of 1992. Results of the RFI are provided in the RFI Report entitled "RCRA Facility Investigation, 30 Cross Street, Bristol, Connecticut", dated January 1992.

Following conditional approval of the RFI by EPA, the Facility initiated closure activities under the guidance of the CTDEP. The closure activities included the decontamination and demolition of the eight concrete storage tanks. The results of the closure activities are provided in a report entitled "Tank Closure Certification Report," Southdown, Inc., Cross Street Facility, Bristol, Connecticut" dated November, 1995. This Tank Closure Certification Report is included in the Administrative Record. CTDEP approved the closure of the tanks and the Facility in a letter dated March 28, 1996.

EXPOSURE PATHWAYS

The results of the RFI demonstrated that minor releases of low concentrations of certain phthalate and cyanide to surficial soils may have occurred. The RFI concluded, however, and EPA concurs, that these releases do not pose an unacceptable risk to public health or the environment. In addition, the RFI concluded that interim measures or a Corrective Measures Study were not necessary. In December, 1992, EPA conditionally approved the RFI and requested that the Facility initiate closure activities.

SELECTED REMEDY

Under CTDEP guidance and oversight, Southdown implemented a closure plan for the facility which involved the decontamination, demolition and removal of the eight underground concrete storage tanks. Southdown's closure remedy is evaluated below with respect to general standards and remedy decision factors. These standards and decision factors provide specific guidance in determining the effectiveness of a remedy or proposed remedy.

- Overall Protection. The excavation and removal of the tanks provides protection of human health and the environment by eliminating potential sources of contamination. Excavation and removal activities included sampling excavated soils to confirm that the remedy was comprehensive. Results of soils sampling indicated that site soils had not been impacted.

- Attainment of Media Cleanup Standards. The implemented remedy attains both Federal and State cleanup standards.

- Controlling Sources of Releases. The implemented remedy is effective in reducing, to the maximum extent possible, further releases of contaminants to the soils or groundwater.

- Compliance with Waste Management Standards. The tank closure activities, as documented in the Tank Closure Certification Report, complied with all applicable requirements for the management of solid wastes.

- Long-term Reliability and Effectiveness. The excavation and removal of the underground tanks eliminates any and all potential hazards posed by their continued presence, and is therefore effective and reliable with respect to both the short and long-term.

- Reduction of Toxicity, Mobility, or Volume of Wastes. The selected remedy reduces the overall toxicity, and the volume of waste by removing the waste and underground tanks.

- Short-term Effectiveness. The removal and excavation of the tanks effectively reduces the possibility of direct human contact with potential contaminants.

- Implementability. Implementation of the remedy occurred over the period of October 31, 1994 through August 9, 1995 with relatively minor delays primarily attributable to ensuring decontamination of the tanks prior to demolition.

- Cost. The cost of the implemented remedy was approximately $600,000 including site closure activities, quality assurance and reporting.

The remedy was then evaluated with respect to human health and current use. This was because in addition to the aforementioned decision

factors, EPA has promulgated criteria by which a level of protectiveness of human health for current use may be ascertained. Collectively, these criteria constitute "Stabilization." The achievement of Stabilization means that there are no unacceptable human health risks and that groundwater contaminants are not migrating off-site. Stabilization occurs when both indicator criteria (Human Exposures Controlled and Groundwater Releases Controlled) are achieved.

- Human Exposures Controlled. The Human Exposures Controlled criteria evaluates whether unacceptable health risks exist at a facility or site.

Analysis of current site conditions demonstrate that there is no unacceptable human exposure to any contaminant (either detected or reasonably suspected to be onsite) in concentrations above action levels, based on current contaminant concentrations and current site conditions. As a result of the tank closure activities, no contamination remains at the facility which may require further remediation.

- Groundwater Releases Controlled. Groundwater Releases Controlled evaluates whether groundwater contaminants may be migrating off-site.

The RFI and groundwater monitoring data demonstrate that contamination has not impacted the aquifer. Further, since the tank closure activities eliminated any potential releases to the aquifer from the tanks, future groundwater protection criteria and objectives for the site are ensured.

In summary, EPA, using all available information, has made a preliminary determination that either releases or suspected releases are either not occurring or likely to occur, or do not pose a threat to human health or the environment. The subsequent decontamination, demolition and removal of the eight underground concrete storage tanks, in accordance with a closure plan approved by the CTDEP, removed the potential sources of contamination in a manner that is effective and comprehensively protective of human health and the environment.

In addition, termination of the Facility's permit and corrective action requirements could allow Southdown to sell the property, which may then become a productive commercial property for the Town of Bristol.

CONTAMINATION DETECTED AND CLEANUP GOALS

Media	Estimated Volume (yd^3)	Contaminant	Maximum Concen-tration	MCL Action Level	MCL Cleanup Goal	Point of Compliance
Soil	0	none	N/A *	N/A	N/A	N/A
Ground water	0	none	N/A *	N/A	N/A	N/A

* N/A not applicable. The RFI and groundwater monitoring data demonstrate contaminants are not in the surficial soil and did not impact the aquifer. Clean closure was achieved for the Southdown Facility through the removal of the tanks, under the authority of the State's base RCRA program.

INNOVATIVE TECHNOLOGIES CONSIDERED

None.

PUBLIC PARTICIPATION

The public comment period took place from August 14 to October 14, 1996 in order to provide an opportunity for public comment and involvement during the evaluation of this proposal. During this public comment period, the public was invited to review the Statement of Basis, the RCRA Facility Investigation (RFI), investigatory activities conducted pursuant to the RFI and to offer comments to EPA. No comments were received during the public comment period.

This Statement of Basis provides only a summary description of the investigation and activities performed at the Facility. Therefore, the public is encouraged to consult the Administrative Record for a more complete discussion. The Administrative Record contains this Statement of Basis, the Facility's RCRA Part B Permit, the results of the RCRA Facility Investigation (RFI) and activities conducted pursuant to the RFI, and other Facility documents which provide a more detailed explanation of the Corrective Action measures under consideration.

The Administrative Record is available for review at the following locations:

EPA Records Center
90 Canal Street, 1st Floor
Boston, Massachusetts 02114
(617) 573-5729

The hours of the EPA Record Center are Monday-Friday 10:00 a.m. to 1:00 p.m. and 2:00 p.m. to 5:00 p.m.

and

Bristol Town Hall
City and Town Clerk Office
111 North Main Street
Bristol, Connecticut 06010
(860) 584-7656

The hours of the Bristol Town Hall are Monday-Friday 8:30 a.m. to 5:00 p.m.

NEXT STEPS

None.

KEY WORDS:
soil, groundwater; waste oils, acids, aqueous wastes, heavy metals, cyanide, phenols, tanks, stabilization, decontamination, and demolition.

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