RCRA SHOWCASE PILOT
REGION 5

Pilot Project Name: Arizona Chemical Project

Facility Name: Arizona Chemical Company (subsidiary of International Paper)

Location: Dover, Ohio

EPA ID #: OHD 004 209 094

Description

1. What makes this project innovative? (Does the project speed achievement of Environmental Indicators? Why will the pilot project/cleanup work?)

RCRA facilities and EPA expend substantial resources preparing for work in the field. Much of this time is spent in workplan preparation. Arizona Chemical and EPA have worked cooperatively to reduce these costs and speed the remedy construction while working within the structure of a traditional 3008(h) Order.

The key to the approach is dividing the remedy construction work into smaller, more manageable pieces. Remedies at units that were not technically complex were constructed while remedy design continued at larger, more challenging units. This approach supported early remedy implementation and work completed in stages was less disruptive to facility operations.

Another important factor of this approach is flexibility in the number of design documents that Arizona was required to submit for EPA review and approval. The order required Arizona to submit a Draft and Final Corrective Measures Implementation (CMI) Workplan, and a Prefinal and Final Design. After reviewing the CMI Workplan, Arizona and EPA agreed on the necessary design changes and EPA approved the document with the condition that the changes would be incorporated into the next design document. This saved Arizona and EPA the time and money spent on revising the CMI Workplan. Next, Arizona and EPA agreed to compress the Prefinal and Final Designs into one document. The reduction in deliverables saved Arizona and EPA resources.

A release of PCBs at one unit required coordination with Toxic Substances Control Act (TSCA). A 'Coordinated Approval' was prepared, and then approved by the Regional Administrator. The Coordinated Approval recognized the work done under the RCRA program and applied it to satisfying the TSCA requirements.

2. What are the benefits of this project (e.g., environmental, community, economic, other)?

Reduction in time to complete remedy construction. The schedule initially anticipated a 6 year construction time period. Work will now likely be completed in 2 years.

Reduction in facility and EPA resource expenditures. This reduction is realized through expedited remedy completion, remedy designs that require less long term operation and maintenance, and more flexible document review and approval process.

Alternate approach of low oversight mechanisms. This approach results in greatly expedited work without the facility taking on significant risk by completing work without EPA approval.

Increased natural habitat. Remedy results in establishing 11 + acres of natural areas at this facility.

3. How have you involved stakeholders in developing this project (for example; owner/operator, tribe, state/local agencies, local community, redevelopers, other interested parties)? Where applicable, please indicate the level of support of the owner/operator.

Project specific goals were set by Arizona and EPA at the beginning of the CMI. Arizona and EPA then developed an approach to achieve those goals.

Pilot goals include:
-remedy construction of first group of units (12/00)
-100% design approval before construction of second group of units (07/01)
-remedy contstruction of second group of units (12/01)

The Wildlife Habitat Council has been consulted regarding remedies establishing habitat.

4. Who are the pilot participants and what is their role (for example; states, tribes, local agencies, other federal agencies, regulated industry, and environmental and community groups)?

Primary participants are Arizona Chemical and EPA.

5. What is the potential for applying this innovative approach to other sites?

Potential is high given the number of corrective actions imposed under traditional 3008(h) Orders.

6. What are the proposed project milestones and associated dates?

Completion of remedy construction by 12/01.

7. Provide a brief description of the pilot facility, including location and regulatory status if pilot addresses a specific facility.

Arizona Chemical is located in Dover, OH and is conducting corrective actions pursuant to a November, 1999, 3008(h) Order. Arizona Chemical produces saturated and unsaturated fatty acids, esters of fatty acids, polyamide resins and glycerine. The remedy calls for measures which include soil excavation, maintenance of pumping rates to control groundwater flow, and engineering and institutional controls.

8. How and when will pilot progress be measured and reported?

Progress will be measured by completion of remedy construction. This is expected to occur by the end of 2001. Region 5 will submit progress reports to EPA headquarters.

9. Who will oversee the pilot (State and/or Region)?

Region 5.

10. Who are the key Regional/State contacts responsible for managing the pilot project (name, phone, e-mail, affiliation)?

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