RCRA SHOWCASE PILOT
REGION 5

Pilot Project Name: Bridgestone/Firestone Streamlined CMI Order

Facility Name: Bridgestone/Firestone

Location: Noblesville, Indiana

EPA ID #: IND 006 418 263

Description

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

This project involves an innovative approach to project management that departs from our normal Corrective Measures Implementation (CMI) process to save time and speed achievement of Environmental Indicators. The basic approach of this Order takes the large-scale remedy and breaks it into individual remedy components which are on separate project tracks. This approach allows for acceleration of certain parts of the remedy; stops delays of other projects while waiting for permits; allows for quicker Agency review and response time; balances the workload for both EPA and Bridgestone/Firestone; and avoids inefficiencies in implementation.

The site remedy involves several fairly discrete components, including a large construction project to address PCBs in a waterway, a pilot program to assess the potential for soil flushing and/or enhanced bio-remediation to address residual sources of chlorinated solvent groundwater contamination and two performance monitoring programs (one to assess the effectiveness of the waterway cleanup and another to confirm proper functioning of the 1992 groundwater extraction and treatment system interim remedial measure).

This CMI Order is broken into two parts under the Work To Be Preformed Section. The first part allows Bridgestone/Firestone to proceed with several components of the remedy without a CMI Workplan. This approach will allow accelerated of completion of those remedial measures. The other part of the Work To Be Preformed Section requires Bridgestone/Firestone to submit discrete workplans for the remaining remedial measures. Having Bridgestone/Firestone deliver individual workplans for the remaining remedial measures, keeps the remedies on separate project tracts, which will increase efficiency in implementation and project management.

Because of its larger scope and requirement for numerous permits, the construction project is by far the most time-consuming aspect of the remedy. The parties recognized that managing the remedy using a comprehensive CMI Workplan/Preliminary Design/Pre-final Design/Final Design/etc. covering all the remedy components would result in delays of months or years in the initiation of the unrelated monitoring and pilot testing aspects of the program, which did not require extensive and time-consuming design or permitting activities. Moreover, a multi-phase design review process standardly used to oversee construction activities is not well-suited to the project's simpler remedy components, such as monitoring, where the design issues are relatively simple (e.g., where to locate monitoring points, depth of wells, etc.) To deal with the problems of potential delay and unnecessary multi-phase review, the CMI order was tailored to put the individual remedy components on separate project tracks, with submission requirements appropriate to each task . This procedural innovation allows Bridgestone/Firestone to accelerate important parts of the remedy, including particularly the groundwater monitoring component which will hasten the achievement of Environmental Indicators.

Also important, dividing the remedy implementation into several tracks avoids inefficiencies in implementation. Tailoring the submission requirements to the task eliminates the need to develop unnecessary multi-phase design submissions for tasks that need only a traditional workplan. Multi-tasking also smooths out the project workload for both Bridgestone/Firestone and EPA. Field work on some tasks can progress while documents are being reviewed and permits are being obtained. This will allow Bridgestone/Firestone to make optimal use of the staff and consultants who are most familiar with the project. If, on the other hand, the remedial components were consolidated on a single track, then when we approved the final construction plans, Bridgesone/Firestone would either have to delay implementation of some aspects of the remedy or bring in additional consultants unfamiliar with the project so that the various pieces of remedial work could be performed simultaneously. By the same token, the Agency can better manage the workload by reviewing several discrete workplans than one consolidated workplan incorporating all the discrete components. In fact, review and approval of the simpler component workplans will generally be faster than if they were tied up with the review of the large construction project deliverables. This means less time in which Bridgestone/Firestone's resources are waiting for Agency guidance, comments or approvals.

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

The benefit of the innovative CMI order is that the normal benefits of remediation are achieved sooner and more efficiently. The remediation provides several important benefits to the community and the environment.

The groundwater containment remedy prevents off-site migration of chlorinated solvents and their degradation products from intractable NAPL sources on the facility. Coupled with an alternate water supply for potentially affected neighbors, which Bridgestone/Firestone provided as an interim remedial measure many years ago, the project guarantees that members of the community will not be exposed to solvent-contaminated water.

The construction remedy in the waterway will remove the vast majority of released PCBs from the aquatic environment, which should reverse PCB bioconcentration in fish and prevent significant recreational exposures to PCBs. Indiana's fish consumption advisory on the downstream waters should eventually be lifted, provided that other toxic compounds in fish tissue (unrelated to Bridgestone/Firestone's activities) also decline.
The flushing/enhanced bioremediation pilot project is directed at accelerating the reduction in dissolved constituent releases from source areas (landfill and spill areas) on the facility property. Without such acceleration, the containment system will have to be operated for at least several more decades, based on observed trends in constituent concentrations. Thus, this remedy component may provide a significant economic benefit.

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.

Bridgestone/Firestone has been closely involved with the development of the innovative management approach and with the development of the corrective measures. The Indiana Department of Environmental Management (IDEM) has followed the development of the project over the years and has provided valuable input to both EPA and Bridgestone/Firestone. Bridgestone/Firestone and EPA worked together to communicate with city and county officials and local residents before, during and after implementation of the several interim remedial measures that directly affected the public. Although the level of community concern regarding the project is relatively low, the community is generally interested in seeing the final remedies implemented. When the draft Statement of Basis proposing the selected remedial measures was subjected to public comment, only a few phone calls and no written comments were received from the community. This appears to reflect a relatively high degree of community confidence that EPA Region 5 and Bridgestone/Firestone have the project in hand and are headed in the right direction.

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)?

The participants who will have a role in the final remedy construction include Bridgestone/Firestone, EPA Region 5, IDEM, and the other federal, state and local agencies that have authority over the construction project. These other agencies include the U.S. Army Corps of Engineers, the Indiana Department of Natural Resources, the IDEM water quality division, and the Hamilton County Drainage Board/County Surveyor. Input will also be received from the community and local officials regarding the logistics of the construction project and the waterway restoration objectives.

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

The innovative procedural approach adopted in this project should be applicable to other project

involving multi-component remedies, particularly where some of the remedy components are relatively simple and not dependent on more complicated and time-consuming remedy components.

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

The proposed project milestones are provided for in the Administrative Order on Consent (AOC). The innovative aspect of the AOC, as noted above, is the subdivision of the multi-part remedy into individual tasks with their own milestones, submission requirements and schedules.

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

Bridgestone/Firestone owns and operates Firestone Industrial Products Company, a manufacturer of air springs and molded rubber products at 1700 Firestone Blvd., Noblesville, IN (the "facility"). The facility has been operating since 1936. The facility was originally comprised of 63 acres and contained two plant areas (Plant 1 and Plant 2). Plant 2 was sold by Bridgestone/Firestone, and the facility now consists of 47 acres. Two landfills (West Landfill and South Landfill) are also located on facility property. Scrap rubber and other plant wastes were disposed in the 6 acre West Landfill with waste disposal discontinued about 1968. The South Landfill, which was mined for sand and gravel prior to Bridgestone/Firestone ownership, consists of 17 acres. Drums and scrap rubber were buried in this landfill from 1965 through 1973.

The Noblesville, Indiana Bridgestone/Firestone facility is conducting RCRA corrective action pursuant to a previous AOC that provided for the facility investigation, interim remedial measures and corrective measures study and the new Corrective Measures Implementation AOC. The facility has submitted a revised closure plan for two greater-than-90-day hazardous waste storage areas (which are no longer used for greater-than-90-day storage) and is awaiting approval of the plan from IDEM.

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

Project progress will be measured and reported according to the schedule provided for in the AOC for submission of plans and reports. Quarterly written progress reports will be submitted by Bridgestone/Firestone to EPA to provide updates on the status of ongoing interim remedial measures and on the progress toward implementation of the final remedies. Additionally, the AOC provides for two meetings per year between Bridgestone/Firestone project staff and the EPA Project Manager to discuss progress on remedy implementation. These meetings will continue until the remedy construction is completed.

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

The project is being overseen by EPA Region 5 staff.

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

Jackie Fisher
312.353.1481
nichele.jacqueline@epa.gov
EPA Region V, Corrective Action Project Manager