

US EPA ARCHIVE DOCUMENT



RCRA SHOWCASE PILOT REGION 6 INNOVATIVE CLEANUP

Borden Chemicals and Plastics Geismar, Louisiana

Work Plan Reviews

The typical cleanup process includes facility submittal of corrective action work plans for agency approval. The regulatory agencies then review the work plans and either approve them, or provide comments requiring the facility to address work plan deficiencies. This process may lead to multiple submittals, reviews, and comment letters. A result is that more time and resources, for both the agency and the facility, are needed to complete corrective action.

U.S. EPA Region 6 and the Louisiana Department of Environmental Quality (LDEQ) are jointly developing a corrective action approach to achieve a faster and more efficient cleanup at the Borden Facility while ensuring protection of human health and the environment. The cleanup is being accomplished under a Consent Decree developed between the parties and the Department of Justice.

The Borden Facility is located in southern Louisiana about 22 miles southeast of Baton Rouge. Processes at the Facility include production of 1,2-dichloroethane (EDC), vinyl chloride monomer, and poly vinyl chloride. Borden is a RCRA interim status facility with a RCRA Part B permit application pending. The areas of contamination to be addressed by the cleanup include volatile organic compounds in soils and DNAPL in ground water.

The innovative cleanup approach being developed for Borden is based on improving communication between the Facility, and Federal and State regulatory agencies. The goal of this approach is to clearly communicate the investigation and cleanup objectives up-front to minimize any uncertainty, and to consider flexible alternatives to accomplishing those objectives.

The highlights of this approach to expedite corrective action include:

- An alternative approach to the traditional work plan approval process is being used for the Borden cleanup. Instead of formally transmitting regulatory agency comments on the corrective action work plans to the facility, the agency

comments are sent to the facility in draft form. A meeting between EPA, LDEQ, and Borden is then scheduled to discuss the draft comments with the goal of developing workable solutions that are acceptable to all parties.

- During the meeting, solutions are developed to address the Federal and State agency concerns and meet the objectives of the cleanup, while at the same time including consideration of the facility's concerns.
- Focusing on the objectives instead of the process enables flexibility in consideration of alternatives and development of acceptable approaches to meeting the objectives.
- Once agreement is reached on how the issues should be addressed, the agency comment letter is finalized to reflect those agreements and formally transmitted to the Facility. Formal transmission of EPA's and LDEQ's comments letter documents the revisions agreed to and provides evidence for the Administrative Record. The Facility will then submit a revised work plan which can be approved.
- Team oversight of the cleanup activities is provided by U.S. EPA Region 6 and LDEQ.
- Borden supports this approach.

Benefits of this approach include:

- Reduced time, cost, and resources necessary to perform the cleanups.
- All traditional enforcement mechanisms are still available should an acceptable agreement not be reached.

Progress Measurement

- A number of corrective action activities are planned for the Borden Facility. These include: (1) installation of a ground water containment system in a deep aquifer, (2) a pumping system to recover contaminated water and dense, non-aqueous phase liquids (DNAPL) in a shallow ground water zone, (3) investigation and cleanup of soil containing mercury, and (4) investigation and cleanup of other specific areas at the facility. Work plans are being submitted for all of these activities, and development of acceptable work plans will be the milestones for this pilot.

- Progress of this approach will be assessed by measuring the time and number of revisions necessary to obtain an acceptable document. Progress on this pilot will be reported on a semi-annual basis.

This method could be duplicated at other contaminated sites to facilitate completion of cleanup, either under orders, permits, or voluntary corrective action. The contacts for this project are:

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