

US EPA ARCHIVE DOCUMENT

RCRA Showcase Pilot - Region 6

Great Lakes Chemical Corporation (GLCC) Facility, El Dorado, Arkansas

Great Lakes Chemical Corporation is an EPA Region 6 - Arkansas Department of Environmental Quality (ADEQ) Corrective Action Strategy (CAS) pilot project. Region 6 has initiated an aggressive program to assist our states in streamlining the RCRA Corrective Action Process. Over the course of the last three years Region 6 with significant input from stakeholders has developed a risk-based guide that can significantly accelerate corrective action at Resource Conservation and Recovery Act (RCRA) facilities. The Region 6 CAS is a flexible guide that can be used to enhance state specific corrective action rules and regulations by highlighting and promoting the use of flexibility found in our national corrective action policy. Under this new approach entire facilities will be evaluated as a whole, investigations and cleanups prioritized on a “worst first” basis to better focus resources (time and money), and corrective action driven by risk based decision making which accurately and realistically reflect current and future land use scenarios and beneficial use of resources.

Facility Name - Great Lakes Chemical Corporation (GLCC)
El Dorado, Arkansas

The Great Lakes Chemical Corporation facility on about 1200 acres southwest of the City of El Dorado. The company began operation in 1965 extracting bromine salts and currently manufactures elemental bromine and brominated organic compounds using approximately 30 different manufacturing processes. Landfill and surface impoundment usage resulted in ground water and soil contamination in approximately 38 SWMUs at the facility. The facility has conducted extensive soil and groundwater investigation but has been stuck in the investigation phase of corrective action for almost 10 years (permitted in 1992). Groundwater extraction is being used as an interim measure for plume containment since 1989. The CAS is being conducted at this facility under a permit. Great Lakes is a GPRAs baseline facility.

Pilot Project Participants - GLCC facility representatives, Arkansas Department of Environment Quality (ADEQ) staff, and EPA Region 6 CAS team members.

Oversight of the GLCC CAS Pilot - Oversight of this pilot will be carried out by ADEQ. The Region 6 CAS team members will participate in meetings and serve as technical advisors.

Key Contacts -

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Innovations of the CAS Pilot Program -

- A remedy proposal for the site (including a source control network (SVE) will be installed in phases beginning by the first of the year. Remedy discussions were previously stalled under the conventional RFI /CMS process
- Performance-Based - developed a conceptual site model to help develop performance standards and data quality objectives to drive site investigation, resulting in a quickly revised monitoring and sampling program for the over 600 monitoring wells on the site to collect only needed data. Site wide ground water monitoring was developed as opposed to a SWMU-by-SWMU approach that did not accurately reflect the overall site conditions
- Prioritizes Corrective Action - utilized screening tables to prioritize corrective action efforts based on risk, worst first approach, focuses time and money for investigations

- and cleanup, flexibility for the owner/operator in achieving performance standards
- Realistic evaluation of current and future site and resource use
- Streamlines administrative procedures with informal and frequent face-to-face communication throughout the process, team members empowered to make decisions for increase trust and timeliness
- Acknowledges cost as a function of remediation
- Remedial selection balanced between treatment, engineering controls and institutional controls
- Recognizes and promotes phased remediation

Stakeholder Support for the CAS - A Risk Evaluation Report and a Risk Management Plan will be developed by the site to be submitted for approval and public comment. Conference call, meetings, or other communication will be conducted as warranted by local interest. EPA Region 6 sought extensive stakeholder input from states, industry, environmental groups, EPA HQs, other EPA regions, etc. during the development of the CAS. The CAS encourages states to implement their own established procedures as long as they provide public participation at key decision making stages such as, agreement on performance standards, remedy proposals, and closeout.

Benefits of the CAS - The CAS is a useful approach to corrective action for facilities that are willing to commit resources up front to manage risk at their sites. Since the CAS takes a site-wide approach to corrective action, this may result in more efficient remedy solutions. Provides a relatively easy administrative approach to conduct corrective action. Promotes a cooperative/results based working arrangement (face to face meetings, gained trust reduces review/oversight needs, allows for use of existing data meeting DQOs, etc.) Promotes early discussion of critical issues and expectations (conceptual site model, DQOs, screening criteria, performance standards, etc). Allows flexibility to achieve results (sampling programs, screening approaches, focus on what's important, recognizes that changes may be necessary throughout the process, etc.). Resource utilization can be better predicted (dollars, personnel).

Proposed Project Milestones - The Scoping meeting for the GLCC pilot was held on January 31 - February 1, 2001. The conceptual site model was developed from extensive data and site review. Groundwater modeling and site-wide risk screening was completed in June 2001. The Corrective Action Work Plan was submitted in July 2001. A remedy proposal for the site, including a source control network (SVE to be installed in phases), will be completed as part of a Risk Evaluation Report and a Risk Management Plan before the beginning of 2002.

Measuring and reporting the Progress of the CAS Pilot - EPA Region 6 CAS team members have developed a Virtual Office, which is an information-sharing extranet site, to be used by all CAS pilot project participants. Authorized users of the VO will be able to track and monitor the progress of the pilot project. Non pilot project participants will have access to pilot summary reports and schedules through an Region 6 public web page.

Application of the CAS for other projects - The CAS was developed as a tool for the states to use to expedite corrective action. The concepts in the CAS can be applied for facilities that are just beginning corrective action, facilities that are not making progress with their investigations, or for facilities that need assistance in remedy proposals. The CAS emphasizes the use of existing data, and does not require additional reporting. For states that have corrective action regulations (generally provide cleanup numbers), the CAS offers an alternative process for completion of corrective action.