

Carol Northern, PG  
Vice President,  
Technical Principal  
WSP USA Inc.

carol.northern@wsp.com  
678-569-2869

# CASE STUDY PARTIAL REMOVAL FROM RCRA PERMIT

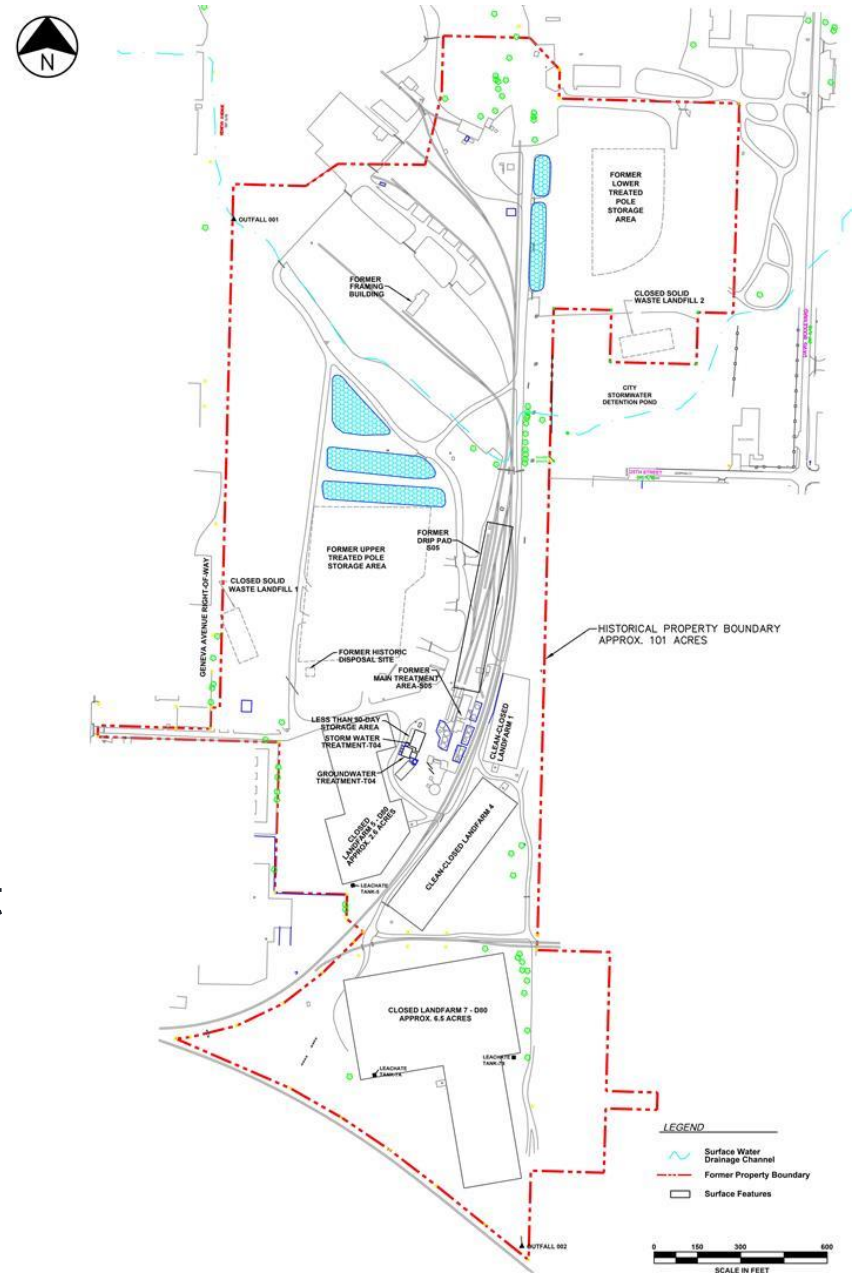


# FACILITY BACKGROUND

- Former 101-acre Treated Wood Products facility located in Missouri, bordered by commercial and light industrial real estate.
- Wood treating began in 1937 using creosote. PCP treating solution (diesel oil and pentachlorophenol) was added in 1955 and in 1979, creosote was completely removed from the treatment process.
- Facility was originally subject to RCRA interim status groundwater monitoring in November 1980. In 1988, MDNR and EPA jointly issued a RCRA Part B Hazardous Waste Management Facility (HWMF) Permit.
- Facility began closure activities for various units in 1986.
- In 1994, MDNR issued a RCRA Post-Closure Permit (Part I) that covered various SWMUs, CAMUs, and site-wide groundwater.
- In 2000, the EPA issued a Hazardous and Solid Waste Amendments (HSWA) Permit (Part II) for those areas/units for which MDNR does not have authority (F032).

# FACILITY CLOSURE

- The Facility ceased operations in April 2006 and the Owner elected to decommission the plant to facilitate potential future industrial use of the property.
- Once decommissioning activities were complete, the Facility consisted of existing regulated units and large areas of vacant land.
- Many interested parties were looking at the property for redevelopment purposes; however, there were roadblocks to overcome.



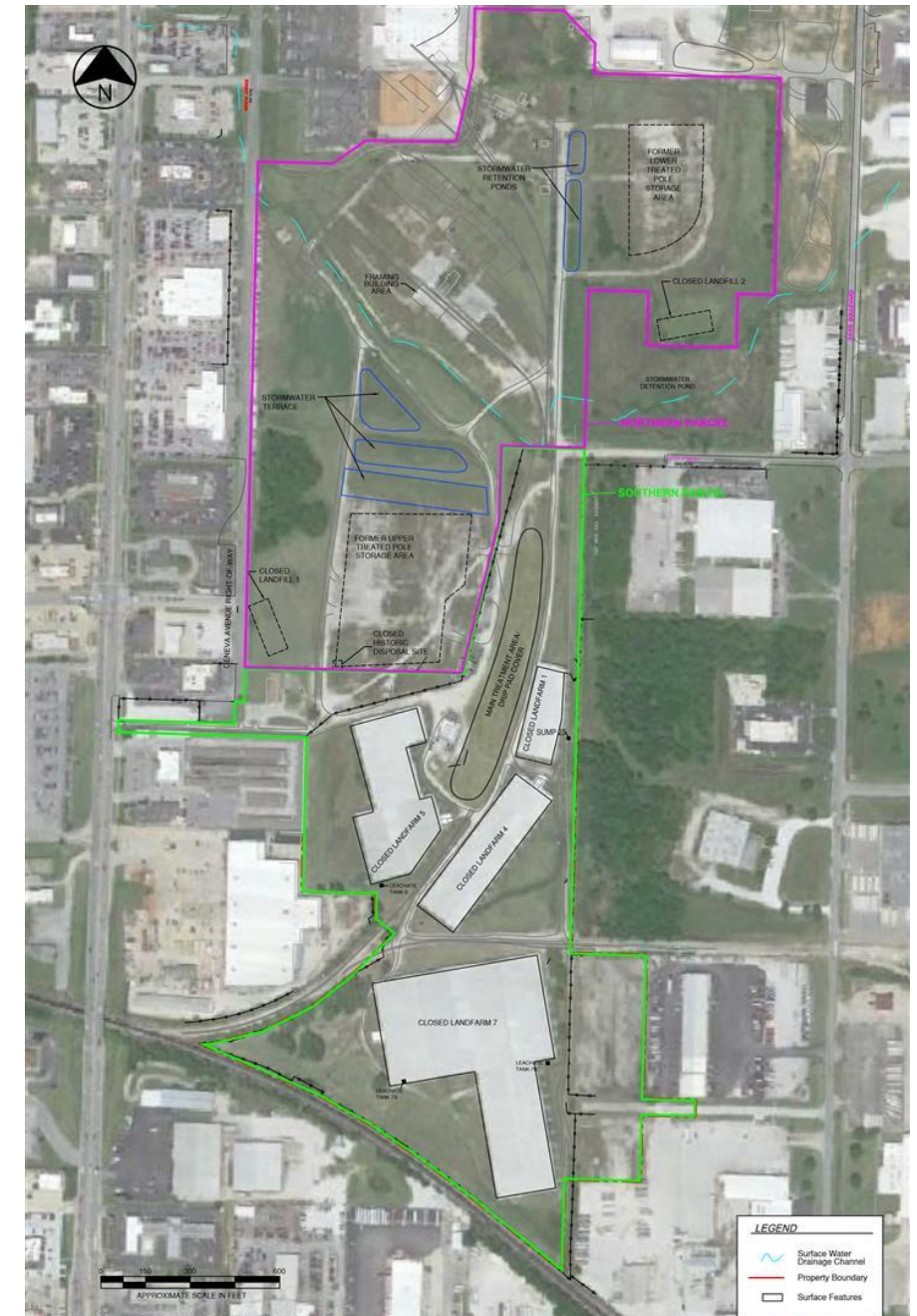
# INVESTIGATION/CLOSURE ACTIVITIES

- In 2006, the Owner, MDNR and EPA met to discuss Facility closure. EPA elected to be the lead agency for closure of the Framing Building Area and the Drip Pad/Main Treatment Area (DP/MTA). MDNR elected to be the lead agency for the remainder of the Facility.
- In 2008, MDNR requested an RFI. RFI activities occurred from 2008 through 2014 when MDNR conditionally approved the RFI.
- The Framing Building Area, which was subject to a CA/FO issued by EPA, was remediated in 2013 and the CA/FO was terminated removing the Framing Building Area from regulation by EPA under the HSWA Part II Permit.
- The DP/MTA was closed in 2015. Post-closure care is conducted under EPA's HSWA Part II Permit.
- By 2015, there was increased interest in the Property for redevelopment; however, multiple impediments still existed.

# IMPEDIMENTS TO REDEVELOPMENT

- RFI not complete
- Post-closure care was required for multiple units
- Groundwater monitoring requirements
- Property subject to regulation under two RCRA Permits issued by two agencies, EPA and MDNR

Solution – split the Property into Northern and Southern Parcels



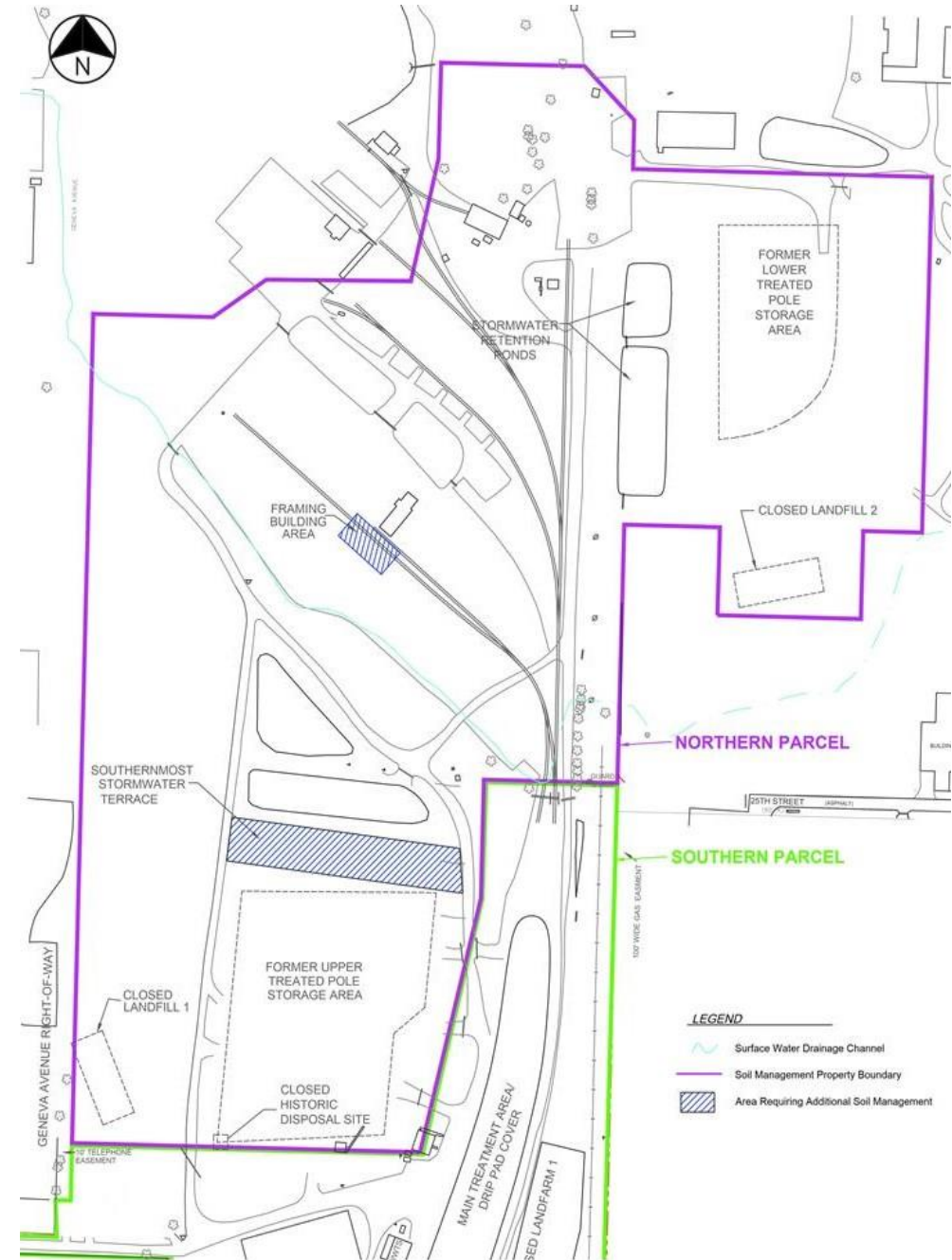


# PATH FORWARD

- Meeting held with MDNR in July 2015 to discuss completion of the RFI and removal of the Northern Parcel from the RCRA Post Closure Permit.
- No groundwater monitoring was required in the Northern Parcel and no units requiring Post-Closure Care were present.
- Risk evaluation conducted for Northern Parcel soils in 2015 concluded risk acceptable for Industrial uses – final piece of RFI.
- In January 2016, MDNR, in coordination with EPA, approved the Facility's RFI.
- In September 2016, in preparation for final closure, the Facility summarized historical data and demonstrated that measures in place on the Northern Parcel addressed contaminant impacts. A request for removal of the Northern Parcel (including six closed SWMUs associated with it), from the facility's RCRA Permit was made.

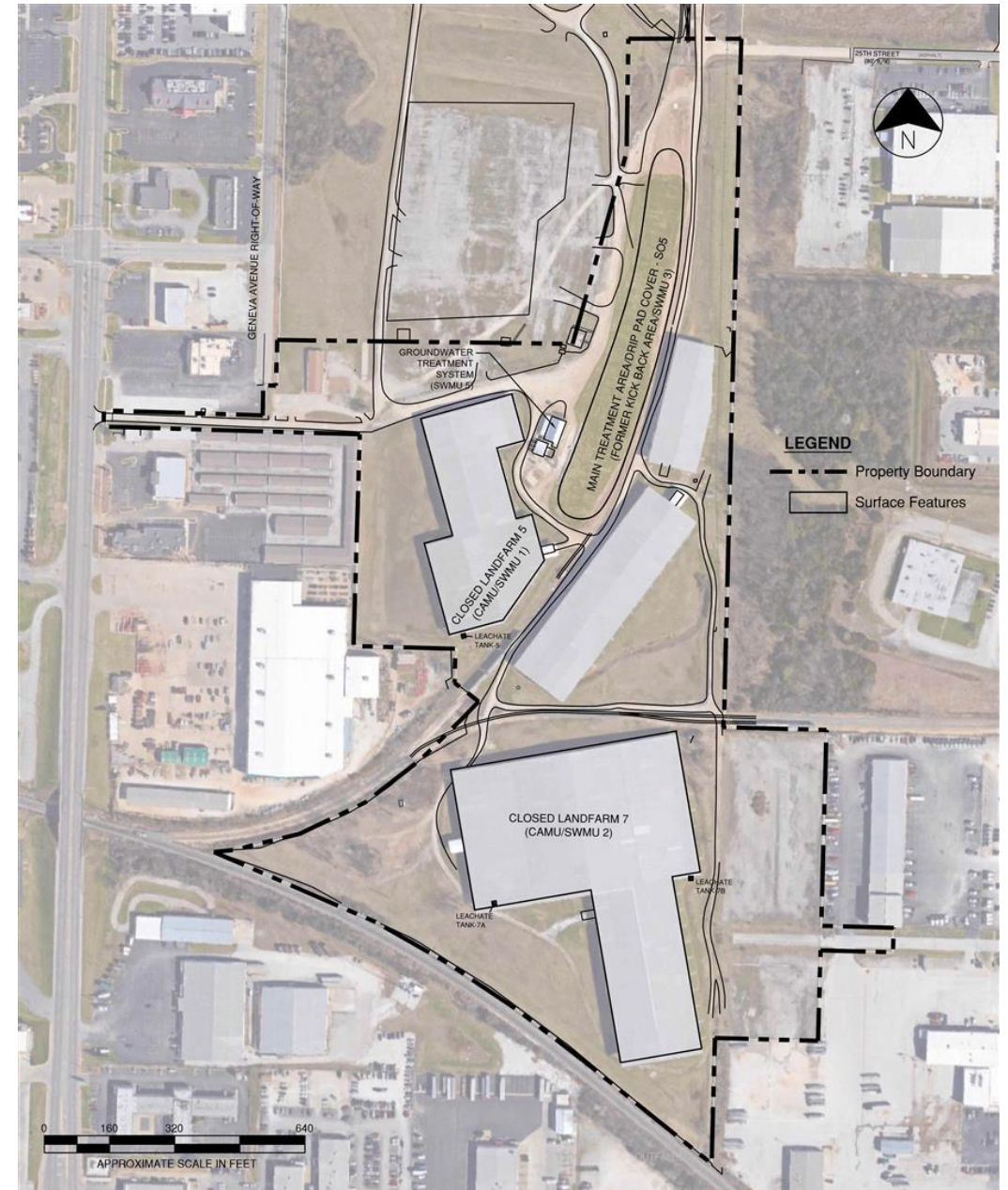
# PERMIT MODIFICATION

- In March 2018, a Class 3 Permit Modification was submitted to MDNR which included a MoECA with a Soil Management Plan for the Northern Parcel.
- A Public meeting was held in April 2018.
- The MoECA was recorded in April 2021.
- On August 18, 2021, MDNR removed the Northern Parcel from Part I of the RCRA Permit.
- On January 24, 2023, EPA removed the Northern Parcel from Part II of the RCRA Permit.



# CURRENT STATUS

- Portion of the Property subject to the RCRA Permit was reduced from 101 to 46 acres.
- The MDNR Post-Closure Care Part I Permit applies to groundwater and post-closure care of two landfarms (5 and 7), located on the Southern Parcel.
- The EPA HSWA Part II Permit applies to post-closure care of the Drip Pad/Main Treatment Area, located on the Southern Parcel.
- The 55-acre Northern Parcel is now available for commercial/industrial redevelopment. Owner is currently in discussions with a potential buyer.





# END RESULT

