RECEIVED
AUG 17 1994
SPFL BRANCH
REGION VII

WASTE GENERATION, STAGING, AND DISPOSAL PLAN

Site: Des Moines TCE
ID #: IAD980687733
Break: 2.4 Oper #4
Other: Bldg Rubble
8-1-94

REVISION #3 - AUGUST 1, 1994

DICO, INC. REMEDIATION ACTIVITIES DES MOINES, IOWA

The remediation activities occurring at the DICO, Inc. facility in Des Moines, Iowa, under the United States Environmental Protection Agency (USEPA) Administrative Order issued pursuant to Section 106(a) of the Comprehensive Environmental Response, Compensation and Liability Act, as amended, (CERCLA), 42 U.S.C. 9606(a), by City Environmental Contracting, Inc. (City), under contract with Titan Wheel International, Inc. (Titan) and Dyneer Corporation (Dyneer), has generated, and will continue to generate as remediation activities progress, various streams and quantities of waste that will require off-site disposal. The following report will describe the generation source of the waste, a description of the generated waste, methods in which the waste is handled, stored, and staged on-site by City personnel, analytical procedures taken to identify and classify waste for disposal according to applicable regulations, and anticipated ultimate disposal of the waste generated. Aptus, Inc. (Aptus), a subsidiary of Westinghouse Environmental Systems and Services Division (Westinghouse), under contract with Titan, is providing analytical services and waste brokerage services for the waste generated at the facility.

HEPAVAC DUST

As set forth in the Work Plan - Removal Action Operable Unit No. 4, DICO, Inc., prepared by Titan/Dyneer Environmental Engineering Department in accordance with the USEPA Work Order, all interior surface areas of Buildings No.1 through No. 5 and the Maintenance Building are being cleaned of all residual material. This is being performed by vacuuming with a High Efficiency Particulate Air (HEPA) filter system to capture the residual material. As a result of this action a waste, being referred to as "Hepavac dust", is being generated during the remedial operations. This waste consists of mostly dust and small debris and the filters from the HEPA vacuum system. This waste also includes dirt and dust hand swept from the floor surfaces. The Hepavac dust is being store onsite in 50 gallon fiber drums, appropriately marked according to the contents, in the Maintenance Building. This material is expected to be hazardous as a result of herbicide and pesticide contamination which past investigations have indicated exist in loose material within the building and upon interior surfaces. Several of the contaminants of concern fall within the classification of Halogenated Organic Compounds (HOCs) and thus, with levels over 1,000 mg/kg, will be regulated under the California list. As no alternative RCRA approved treatment methods exist, this waste will be incinerated to comply with land ban restrictions.

A composite sample will be taken of the Hepavac dust consisting of numerous individual samples

30221126
Superfund

from various drums of accumulated waste. This sample will be analyzed by Aptus according to their internal incineration criteria parameters. The Hepavac dust will continue to be stored in the fiber drums for transportation and will be incinerated along with the drums. The waste will be properly labeled for transportation and disposal. RCRA waste codes will depend on the analytical but it is anticipated the waste will be labeled with P-codes.

With approval from Aptus, this waste will be transported to the Aptus facility for incineration at the following address:

Aptus
11600 North Aptus Road
Aragonite, UT 84029

In the event the Aptus Utah facility can not accept the waste due to storage restrictions, the following Aptus facility will serve as a backup, where the waste will also be incinerated:

Aptus
Hwy 169 N.
Coffeyville Industrial Park
P.O. Box 1328
Coffeyville, KS 67337

ALDRIN CONTAMINATED SOIL

As set forth in the Work Plan - Removal Action Operable Unit No. 4, DICO, Inc., prepared by Titan/Dyneer Environmental Engineering Department in accordance with the USEPA Work Order, soil surrounding the location of the aldrin tank annex will be removed. It is expected that approximately 30 yd^3. of soil will be removed and will require disposal. This material is expected to be hazardous as a result of herbicide and pesticide contamination which past investigations have indicated exist within the soil in the area around the aldrin tank. Several of the contaminants of concern fall within the classification of Halogenated Organic Compounds (HOCs) and thus, with levels over 1,000 mg/kg, will be regulated under the California list. As no alternative RCRA approved treatment methods exist, this waste will be incinerated to comply with land ban restrictions.

A composite sample will be taken of the aldrin contaminated soil consisting of numerous individual samples from various locations within the immediate vicinity of the tank, where past investigative sampling has indicated high levels of aldrin contamination. This sample will be analyzed by Aptus according to their internal incineration criteria parameters. The soil will be placed directly into roll-off containers immediately after removal to await transportation. The waste will be properly labeled for transportation and disposal. RCRA waste codes will depend on the analytical but it is anticipated the waste will be labeled with P-codes.

With approval from Aptus, this waste will be transported to the Aptus facility for incineration at

the following address:

Aptus
11600 North Aptus Road
Aragonite, UT 84029

In the event the Aptus Utah facility can not accept the waste due to storage restrictions, the following Aptus facility will serve as a backup, where the waste will also be incinerated:

Aptus
Hwy 169 N.
Coffeyville Industrial Park
P.O. Box 1328
Coffeyville, KS 67337

DECONTAMINATION TRASH/PPE

As set forth in the Work Plan - Removal Action Operable Unit No. 4, DICO, Inc., prepared by Titan/Dyneer Environmental Engineering Department in accordance with the USEPA Work Order, waste generated as a result of decontamination activities and the operators' Personnel Protective Equipment (PPE) will be segregated and stored onsite until transportation and disposal is arranged. This material is expected to be hazardous as a result of herbicide and pesticide contamination which past investigations have indicated exist within the buildings. The operators protective clothing and other decontamination trash is expected to have residual material from within the buildings. Several of the contaminants of concern fall within the classification of Halogenated Organic Compounds (HOCs) and thus, with levels over 1,000 mg/kg, will be regulated under the California list. As no alternative RCRA approved treatment methods exist, this waste will be incinerated to comply with land ban restrictions.

A composite sample will be taken of the decontamination trash/PPE consisting of numerous individual samples from various drums and different types of waste (such as gloves, boots, tyvek, towels, etc.). This sample will be analyzed by Aptus according to their internal incineration criteria parameters. The decontamination trash/PPE is currently being stored in 50 gallon fiber drums that are appropriately marked to the contents. It is expected that the decontamination trash/PPE will be transferred to a roll-off container for bulk transportation and disposal. The waste will be properly labeled for transportation and disposal. RCRA waste codes will depend on the analytical but it is anticipated the waste will be labeled with P-codes.

With approval from Aptus, this waste will be transported to the Aptus facility for incineration at the following address:

Aptus
11600 North Aptus Road
Aragonite, UT 84029

In the event the Aptus Utah facility can not accept the waste due to storage restrictions, the following Aptus facility will serve as a backup, where the waste will also be incinerated:

Aptus
Hwy 169 N.
Coffeyville Industrial Park
P.O. Box 1328
Coffeyville, KS 67337

REMOVED INSULATION

As set forth in the Work Plan - Removal Action Operable Unit No. 4, DICO, Inc., prepared by Titan/Dyneer Environmental Engineering Department in accordance with the USEPA Work Order, waste generated by removing insulation beyond repair or no longer required will be containerized for proper handling and disposal. This material is expected to be hazardous as a result of PCB contamination which past investigations have indicated exist within the buildings insulation. It is expected that the removed insulation will be landfilled in a RCRA approved PCB landfill.

A composite sample will be taken of the removed insulation consisting of numerous individual samples from various drums of the insulation generated thus far. This sample may not require analytical since a profile may be all that is required by the disposal facility but it will be available if an analysis is required. The removed insulation is currently being stored in 50 gallon fiber drums that are appropriately marked to the contents. The waste will be properly labeled for transportation and disposal.

This waste will be transported to and landfilled at a PCB approved landfill, most likely the ChemWaste PCB approved landfill in Emelle, Alabama.

WASTE WASHWATER

As a result of floor washing, decontamination activities, and the parts washing system, waste washwater is being generated from the remedial activities. This material is currently being stored onsite in several 1,500 gallon settling tanks with temporary secondary containments systems. The water is being stored to allow the solids to settle out. Once the washwater has had sufficient time to settle, the water will be run through a filtration unit, specifically designed for herbicide/pesticide applications. At this point, it is expected the water will be "clean" enough for discharge via sanitary sewer system. A sample of the existing washwater has been collected by a representative of the Des Moines POTW for their analytical. With permission of the Des Moines

POTW the settled and filtered washwater will be disposed of through a sanitary sewer line onsite. If the washwater is not acceptable by the Des Moines POTW other disposal options will be pursued.

WASHWATER SLUDGE

The process of allowing the washwater to settle and then filtering will produce a sludge. This material will be removed from the settling tanks once the washwater has been removed and will be stored onsite in 55 gallon steel drums. A representative composite sample will be collected for analysis by Aptus to determine whether the waste is suitable for landfill or if it is classified as a hazardous waste. Disposal will depend on the analytical results and will follow all applicable regulations.

If analytical results indicate that the waste will require incineration, with approval from Aptus, this waste will be transported to the Aptus facility for incineration at the following address:

Aptus
11600 North Aptus Road
Aragonite, UT 84029

In the event the Aptus Utah facility can not accept the waste due to storage restrictions, the following Aptus facility will serve as a backup, where the waste will also be incinerated:

Aptus
Hwy 169 N.
Coffeyville Industrial Park
P.O. Box 1328
Coffeyville, KS 67337

If analytical results indicate that the waste can be landfilled, the waste will be transported and disposed of at the Des Moines Solid Waste Agency managed by Waste Management of Iowa, Inc., a division of Waste Management. This facility is located outside of Des Moines.

POTENTIALLY NONHAZARDOUS DEMOLITION WASTE

The following waste streams are materials that will be removed from within the buildings and may have the potential to contain residual materials with the presence of the contaminants of concern. The material will be vacuumed clean with the HEPA system to remove any residual material that may exist. This is expected to remove the potential for contamination within this material so that it may be disposed of via a sanitary landfill. The material will be sampled to determine if it is

"clean" enough to be accepted in a sanitary landfill. The material will be stored onsite in roll-off containers, lined with visqueen or similar plastic sheeting, until analytical results indicated sanitary disposal is permissible.

Ceiling Tiles/framework: A representative sample of the ceiling tiles being removed from the Maintenance Building will be collected from the material generated to this point. Framework and other metal attachments of the suspended ceiling will be treated based on results from the ceiling tile analysis. This sample will consist of numerous individual samples from ceiling tiles from various areas of the ceiling so that a representative composite sample is prepared. This sample will be analyzed by Aptus for a full TCLP with the plans for disposal via sanitary landfill. In the case that contamination is present disposal will be based on the analytical results and applicable regulations.

Wall Boards: A representative sample of the wall boards being removed from the Maintenance Building will be collected from the material generated to this point. This sample will consist of numerous individual samples from wall boards from various areas of the building so that a representative composite sample is prepared. This sample will be analyzed by Aptus for a full TCLP with the plans for disposal via sanitary landfill. In the case that contamination is present disposal will be based on the analytical results and applicable regulations.

Wood Shelving: A representative sample of the wood shelving being removed from various areas of the buildings will be collected. This sample will consist of numerous individual samples from wood shelves from various areas of the buildings so that a representative composite sample is prepared. This sample will be analyzed by Aptus for a full TCLP with the plans for disposal via sanitary landfill. In the case that contamination is present disposal will be based on the analytical results and applicable regulations.

Pallets/cardboard: A representative sample of the pallets/cardboard being removed from various areas of the buildings will be collected. This sample will consist of numerous individual samples from pallets/cardboard from various areas of the buildings so that a representative composite sample is prepared. This sample will be analyzed by Aptus for a full TCLP with the plans for disposal via sanitary landfill. In the case that contamination is present disposal will be based on the analytical results and applicable regulations.

Other Miscellaneous Demolition Waste: As other demolition waste streams are identified required sampling will be performed. If a demolition waste stream occurs that is minimal in volume, the results from other sampling results and/or judgement based on knowledge of the site will be used to determine disposal options.

If analytical results indicate that the waste will require incineration, with approval from Aptus, this waste will be transported to the Aptus facility for incineration at the following address:

Aptus
11600 North Aptus Road

Aragonite, UT 84029

In the event the Aptus Utah facility can not accept the waste due to storage restrictions, the following Aptus facility will serve as a backup, where the waste will also be incinerated:

Aptus
Hwy 169 N.
Coffeyville Industrial Park
P.O. Box 1328
Coffeyville, KS 67337

If analytical results indicate that the waste can be landfilled, the waste will be transported and disposed of at the Des Moines Solid Waste Agency managed by Waste Management of Iowa, Inc., a division of Waste Management. This facility is located outside of Des Moines.