

CITY CHEMICAL COMPANY - FORSYTH ROAD
3290 Forsyth Road
Winter Park, Florida
County: Orange
District: Central
Site Lead: EPA
Placed on National Priorities List 9/89
HWC # 08

Site Description and History

The City Chemical Company-Forsyth Road site is located at 3920 Forsyth Road, Winter Park, Florida. This one-acre facility operated from 1971 to August 1983. Activities included the receipt, handling, storage, reclamation, and disposal of a wide variety of waste chemicals. Due to inadequate plant practices and intentional dumping, soil and ground water at the site are contaminated. Surface drainage was directed into a ditch running along the front of the property and subsequently into Crane Strand wetland.

Threat

Wastes found in the soil and ground water include a wide variety of chlorinated and non-chlorinated organic solvents, paint and varnish wastes, acid/alkaline plating wastes, waste ink and other solvents.

A number of private wells are located within a 2000-foot radius of the site; however, none of these wells are used for drinking water purposes. The City of Winter Park's well field is located approximately 1900 feet from the site but these wells draw water from a minimum of 700 feet below ground surface and there is a 140-foot thick confining layer separating the contaminated surficial aquifer from the Floridan Aquifer.

Response Strategy and Status (September 2004)

In August 1983, the site was abandoned by the owner, leaving approximately 1200 drums of hazardous waste and thousands of gallons of sludge in a number of large holding tanks on site. A state-funded removal of these wastes was conducted during August and September 1983. A suit was filed against the company and the property owner in January 1984. The company and its owner defaulted twenty days later. In February 1984, the EPA removed the remaining sludge and storage tanks. In May 1984, the EPA removed 1670 tons of contaminated soil, heat treated it, and returned it to the site. Additionally, 180 cubic yards of contaminated soil was removed and transported to a hazardous waste landfill. In December 1985, the facility owner was indicted for RCRA violations and criminal charges. He was found guilty of 17 counts, received a suspended sentence and ordered to serve three months in jail. In August 1988, the 11th Circuit Court of Appeal reversed the original court's dismissal of two illegal dumping charges. In December 1988, the facility owner was sentenced to an additional 15 months in jail.

In May 1986, the FDEP contractor completed a multi-phase Contamination Assessment. The final Contamination Assessment concluded that a contaminant plume in the surficial aquifer had migrated approximately 600 feet to the east of the site. A possible sinkhole

was discovered in close proximity to the site, and the FDEP contractor completed an investigation of the area in October 1986, which indicated a potential for contamination of the Floridan Aquifer. Additional investigation of the Floridan aquifer was recommended.

In February 1987, the PRP contractor, Geraghty and Miller, Inc submitted the Feasibility Study (FS) Work Plan. In December 1987, the revised FS Work Plan was approved by FDEP and the FS was initiated in February 1988. Installation and sampling of a Floridan Aquifer monitor well was completed in July 1988. The sampling results indicated that the City Chemical site had not contaminated the Floridan Aquifer. The draft FS was completed by the PRP contractor in December 1988, and submitted to FDER and EPA for review.

The recommended remedial alternative consisted of groundwater recovery, treatment by air stripping, and discharge of effluent to the Iron Bridge Publicly Owned Treatment Works (POTW). FDEP and the EPA completed the FS review in February 1989, and the FS was found to be unsatisfactory. In March 1989, lead management role for the site was transferred from FDEP to EPA. In April 1989, the PRP Committees submitted a response to the FDEP and EPA review comments. In June 1989, the PRPs submitted a second draft of the FS. In August 1989, the FDEP submitted their review comments for the revised FS to the PRP committees and the EPA. A number of significant problems still existed with the FS, resulting in FDEP requesting EPA to take over completion of the FS. In November 1989, the EPA met with the PRP Committees, submitted their review comments, and notified the PRP Committees that FS revisions must be completed by December. In December 1989, the PRP Committees submitted the third draft of the FS to EPA and FDEP for review. The FS was found to be unsatisfactory, and EPA tasked Weston, Inc. to satisfactorily complete the FS. Weston completed the FS revisions in June 1990,

In January 1990, the EPA held a public meeting in Orlando to present the selected remedial alternative. In March 1990, the draft Record of Decision (ROD) was submitted to FDEP for review and concurrence; FDEP concurred with the ROD in April. The selected remedy consisted of pumping the ground water, treating it by air stripping, and discharging the treated water to the Iron Bridge POTW. The contingency remedy called for discharge of the treated water to a nearby canal. Because the EPA and Iron Bridge POTW were unable to reach agreement with regard to the City Chemical discharge, EPA implemented the contingency remedy.

In September 1990, the EPA tasked Weston, Inc. to develop a work plan for additional site investigation and design. In October 1991, EPA and the PRPs entered into a Consent Decree, which provided for de minimus parties to pay for the design through a trust fund and EPA would conduct the design through a federal contractor. The remaining de maximus parties would pay for the construction, operation and maintenance of the designed treatment system; again, EPA would construct the system through a federal contractor.

In January 1991, EPA submitted a draft Remedial Design (RD) Sampling and Analysis Plan for review by FDEP. In January 1991, EPA selected PEER Environmental to conduct the treatability studies and treatment system design. Copies of the final RD Work Plan and RD sampling and analysis plan were forwarded to FDEP in June 1991. EPA obtained an NPDES permit for stormwater discharge of treated groundwater. In March 1992, FDEP completed a review of the 100% design documents and suggested that EPA modify the design criteria to reflect State of Florida Class III Standards.

In March 1993, the EPA selected ERM-Enviroclean, Inc. as the remedial action contractor. The construction of the groundwater treatment system was completed in October 1993. A 30-day startup test was successfully completed in May 1994. The treatment system is now in the Operation and Maintenance phase.

In February 1994, the EPA issued an Explanation of Significant Differences (ESD) to add vinyl chloride and cis-1,2-dichloroethene to the list of contaminants in the ground water requiring cleanup.

The Operation and Maintenance phase (O&M) of this project is scheduled for 15 years with 5-year reviews and quarterly reports. The first five-year review was received in March 1997. The second five year review was received in August 2004 and is currently undergoing FDEP review.

Schedule

The NPDES discharge permit is up for renewal in December 2004 and is currently under review. The next five-year review should be received in 2009.