

RCRA CORRECTIVE ACTION – BIOTECHNOLOGY COMPANY
Confidential Client, Northern Illinois

A biotech company in Northern Illinois has been in operation since the late 1940's developing and manufacturing organic chemicals for research and medical industries. During the 1960s through the early 1980s, the facility operated two underground storage tanks utilized for the storage of chemical waste. Following passage of the Resource Conservation and Recovery Act (RCRA) the facility submitted a RCRA Part A and Part Permits (for the treatment, storage, or disposal of hazardous waste) but elected to forgo the treatment, storage and/or disposal of hazardous waste and close all storage and disposal units identified on site. As part of the closure process, the facility removed the two underground storage tanks in 1984. However the presence of impacted groundwater prevented "clean closure" under RCRA. Subsequently, the former underground storage tank cavities were closed as "landfills" in 1989.

In 1997, the facility was issued a Part B Post-Closure Permit (Permit) under RCRA. Under the Permit, the facility was required to conduct post-closure care and remediation of the groundwater associated with the former underground storage tanks, address two surface impoundment ponds, and address five (5) RCRA Solid Waste Management Units (SWMUs). The facility retained a Project Team managed by current Swenson – Marzec & Associates, Inc. (SMA) employees to manage and streamline their RCRA Permit. The staff now at SMA have:

- Worked to develop a relationship with the regulatory agency to ensure an open dialog exists between the regulatory agency and the client.
- Obtained "Closure by Removal" demonstration for the two surface impoundment ponds;
- Obtained RCRA closure of the five (5) SWMUs;
- Oversaw the operation of the groundwater corrective action program, including the operation of the groundwater extraction system.
- Monitored the effectiveness of the groundwater corrective action program through the collection an analysis of groundwater samples in accordance with the facility's Post-Closure Permit.
- Drafted Class I and Class II permit modifications to ensure the facility's Post-Closure Permit is reflective of current site conditions and minimize costs associated with sampling and financial assurance requirements.
- Drafted and submitted the facility's RCRA Part B Post Closure Permit Renewal applications.