



PROFESSIONAL PROFILE



Frank Santella, PG

Technical Director

EXPERIENCE SUMMARY

Mr. Santella is a Professional Geologist with more than thirty-five years of environmental consulting experience. His work focuses on developing and implementing cost-effective solutions for soil and groundwater contamination assessment and remediation; underground storage tank closures and installations; environmental compliance audits; ASTM site assessments; solid and hazardous waste management; and real estate transaction due diligence. He has coordinated and implemented CERCLA pre-remedial Site Inspections for the US EPA in Region 5 under the Field Investigation Team contract. His responsibilities included sampling groundwater monitoring well networks, soil, sediment, and surface water in accordance with US EPA protocols to characterize sites, determine Hazard Ranking System scores, and support National Priorities List listing decisions.

Mr. Santella has extensive experience helping clients resolve regulatory compliance matters involving solid waste disposal, scrap metal recycling, automobile salvage, aggregate mining, and a range of manufacturing industries. He is a long-standing member of the Recycled Materials Association (formally Institute of Scrap Recycling Industry) and past Legislative Chair of its Chicago Chapter, where he applies his technical expertise to advocate for the industry.

TECHNICAL SPECIALTIES

Mr. Santella's technical specialties Include:

- Soil and Groundwater Contaminant Investigation and Remediation
- Hazardous Waste Management
- Environmental Due Diligence
- Stormwater Permitting and Planning
- SPCC Planning
- Landfill Monitoring Networks
- Environmental Compliance Audits/Strategies

REPRESENTATIVE PROJECTS

- Developed and managed a time-critical remediation project under a US EPA Administrative Order on Consent for an international manufacturer of liquid-level and flow-control devices. Oversaw regulatory coordination, subcontractors, schedule, budget, and health and safety. The project included excavation and off-site disposal of approximately 3,200 tons of hazardous and non-hazardous VOC-impacted soil beneath the former facility and installation of a vapor mitigation system to address intrusion risks and meet consent-order requirements.
- Designed and implemented an Incremental Sampling Methodology program to characterize and remediate lead-impacted soil at a former nine-acre Arkansas scrap metal recycling facility. Established six decision units across seven soil management zones to assess heterogeneous fill and guide risk-based remediation. Managed excavation and disposal of approximately 1,300 tons of hazardous lead-contaminated soil, including chemical stabilization, and more than 16,400 tons of non-hazardous soil to meet site-specific objectives for lead, arsenic, chromium, and PCBs. Used ProUCL to confirm post-remediation results met cleanup criteria at the 95-percent upper confidence limit.
- Led a multidisciplinary forensic investigation of a hammermill explosion at a Minnesota scrap recycling, assessing damage and operational and mechanical causes. Recommended interim venting to mitigate overpressure risks until a permanent engineered solution was installed.

CONTACT INFORMATION

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EDUCATION

BA, Geology, University of
Northern Iowa

PROFESSIONAL LICENSES

Licensed Professional Geologist,
Illinois (#196.000269)
Certified Professional Geologist,
Indiana (#IN1798)
Registered Professional Geologist,
Wisconsin (#942-13)

- Managed the characterization and remediation of PCB-impacted soil and debris after vandalized, out-of-service transformers released more than 2,100 pounds of PCBs at an Illinois facility operated by an international scrap metal recycler. Directed site assessment, impact delineation, waste characterization, excavation, confirmation sampling, transportation, disposal, and compliance documentation under the US EPA PCB Spill Cleanup Policy. Aligned the client, contractors, and regulators to expedite response actions and restore affected areas.
- Managed technical support and corrective actions for a major Illinois scrap metal recycling facility following a US EPA multimedia compliance inspection. Revised the facility's SWPPP and SPCC Plan, originally prepared by others, to correct deficiencies and meet applicable state and federal requirements. Developed SOPs and operation and maintenance plans for structural stormwater controls, including an oil-water separator and bioswale system, to promote ongoing compliance and effective operation. Coordinated with the client, regulators, and outside counsel to negotiate a CWA Administrative Order on Consent that resolved the compliance issues without stipulated penalties.
- Represented a major national scrap recycling company with environmental due diligence activities (Phase I & II) for a multi-state, fifteen site acquisition. Coordinated multi-site field investigations that included soil sampling to assess RECs and potential impacts associated with existing and historical recycling operations.
- Served as Project Manager for a complex scrap hammermill air permitting initiative in Illinois involving the construction and startup of a new emission unit and revision of existing VOM emission factor. Managed the overall permitting strategy, technical coordination, regulatory communications, and schedule execution to support the facility's transition from a registration source status to a FESOP.
- Served as Project Manager for remediation of TSCA-level PCB and hazardous lead impacted soil at a former scrap metal recycling facility in Tucson, Arizona for redevelopment of a mixed use residential/commercial property.
- Directed the design, permitting and construction of soil vapor extraction (SVE) systems at two Illinois active solid waste landfills. The systems served as corrective measures to

remediate VOC impacts caused by methane gas migration and partitioning into groundwater within established GMZs. Amended the facilities FESOP and Title V air permits following sampling and analysis of SVE exhaust to determine hourly and annual maximum and typical NMOC emissions.

- Saved a national automobile collision repair client tens of thousands of dollars during a property divestiture by avoiding unnecessary voluntary assessment and remediation under the Illinois EPA's SRP. Re-evaluated methylene chloride groundwater impacts reported by the prospective purchaser's consultant and determined that they resulted from laboratory error rather than actual groundwater conditions. The findings enabled the transaction to proceed without agency oversight or further remediation
- Planned and conducted site characterizations to delineate soil and groundwater contamination plumes using various invasive and non-invasive techniques; developed conceptual site models; evaluated exposure pathways; determined applicable SSLs and identified potential risks to receptor populations.
- Developed and completed self-implemented and risk-based PCB remediation projects in Illinois and Mississippi for regional scrap metal recycling companies.

REPRESENTATIVE EXPERT RETENTIONS/APPEARANCES

- Testifying expert in City of Chicago Administrative Court hearing on behalf of a major scrap recycler appealing an operating permit denial. Prepared affidavit related to stormwater compliance, Health Impact Assessment, Human Health Risk Assessment and sampling activities performed by City's environmental consultant.

PROFESSIONAL TRAININGS

OSHA 40-Hour HAZWOPER Health and Safety Trained

OSHA 8-Hour HAZWOPER Management and Supervisory Trained

PROFESSIONAL AFFILIATIONS

Recycled Materials Association (formerly Institute of Scrap Recycling Industries)

SPEAKING ENGAGEMENTS

Understanding PFAS: An Evolving Environmental Concern for the Scrap Metal Industry. Institute of Scrap Recycling Industries Safety and Environmental Council, Atlanta, GA. June 2020.