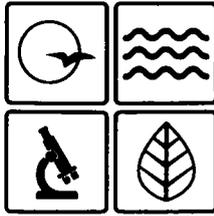


*note: Randy / Jamie
Heater*



Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Michael L. Parson, Governor

Carol S. Comer, Director

September 6, 2018

Mr. Ken Buchholz
Assessment Emergency Response & Removal Branch
U.S. EPA, Region VII
11201 Renner Blvd
Lenexa, KS 66219

Re: Good Hope Road Drums Site, 3285 Good Hope Road, Berger, MO

Dear Mr. Buchholz,

The Missouri Department of Natural Resources' (department) Hazardous Waste Program's (HWP) Site Assessment Unit (SAU) has been conducting a Pre-CERCLA Screening investigation at the above referenced site. The department is hereby referring the Good Hope Road Drums site to U.S. Environmental Protection Agency (EPA) Region 7 for a Time-Critical Removal Action to address risk associated with the potential for a release of hazardous substances from 86 abandoned drums. A Request for Federal Action form is enclosed with this letter along with supporting documentation. A brief summary of the site is included below.

Background

The Good Hope Road Drums site consists of eighty-six (86) 55-gallon drums, potentially containing hazardous substances that were disposed of on private property located at 3285 Good Hope Road in Berger, Missouri, 7.5 miles southwest of New Haven. The property is a 20 acre rural parcel, currently owned and occupied by [REDACTED], surrounded by pasture land and dense forest. Current property use is pasture land and dense forest surrounding [REDACTED] residence located 1,200 feet southeast of the drum site. The metal drums on this site are located in a forested area approximately 0.8 acre in size on the northwestern edge of an open field.

In January 2018, the department's St. Louis Regional Office (SLRO) received a complaint from a neighboring property owner's attorney regarding the drums. In response to the complaint, department and EPA representatives attempted to visit the site in January 2018 to investigate; however, [REDACTED] denied access to his property at that time. In March 2018, SLRO staff contacted [REDACTED], and he granted access for staff to investigate the drums.

The majority of the drums are not labeled, although a few have stenciled manufacturer names on them, including "Argus Chemical Co., Cyanamid, Dow Corning Silicones, Puritan Chemical, and Rohm & Haas Company". Additionally, the following labels on several of the drums provide an indication of the contents, suspected to be hazardous substances: "Warning: May be toxic if



Recycled paper

swallowed. May cause skin irritation. Avoid prolonged exposure to vapor. Avoid contact with skin, eyes and clothing.”

Conditions of the drums vary from fully intact to partially rusted and/or leaking contents. Several of the drums are rusted through and the contents are visible: a solid, resin-type material with a bluish green and/or yellow tint to it. Chunks of this material lay loose on the ground in several areas. SLRO staff did not note any unusual odors or stressed vegetation at the time.

██████████ stated the drums were likely abandoned over 50 years ago, before he purchased the property. He believes the drums may have come from American Recreation Products in New Haven, and that they might contain some sort of water proofing material, although he could not confirm the information.

Pre-CERLCA Screening Investigation

On April 17, 2018, the department’s Superfund SAU and Environmental Services Program (ESP) conducted a site visit to conduct a drum inventory. A strong solvent odor was noted when ESP staff started cataloging the drums. Several of the drums showed signs of leaking from the top bung or from rusted holes in the drums. A total of 32 drums were in poor condition with contents leaking onto the ground. All drums were marked with numbers by ESP staff and information about each drum documented on a drum log, except those that were completely rusted through. No sampling has been conducted to date. ██████████ informed staff that he has three springs on his property, one of which is used as his source of drinking water.

This site warrants entry onto the Superfund Active site inventory for further investigation due to the potential for a release of hazardous substances from the 86 abandoned and/or leaking 55-gallon drums suspected to contain hazardous substances including solvents with volatile organic chemicals. SAU is preparing a Pre-CERCLA Screening report for submittal to Jamie Bernard-Drakey, EPA Region 7 Site Assessment Manager, upon completion. Enclosed, in addition to the RFA Form, are all supporting documents: site location map, drum log sheet, photographs, a site visit memo and emails documenting the history of the site.

If you have any questions, please feel free to contact me at (573) 751-7880 or toll free at 1-800-361-4827, or by e-mail at valerie.wilder@dnr.mo.gov.

Sincerely,

HAZARDOUS WASTE PROGRAM



Valerie Wilder, Chief
Superfund Section

VW:rc

Enclosures

REQUEST FOR FEDERAL ACTION

The **Missouri Department of Natural Resources** requests assistance from the United States Environmental Protection Agency, Region 7 (EPA) to conduct a removal site evaluation to determine if a removal action is appropriate for the following site:

Good Hope Road Drums Site

3285 Good Hope Road

Street Address, Parcel Number or Other Property Description

Berger 65803-9579

City

Franklin

County

MO

State

A detailed site description and background information are attached to this request.

By making this Request, the Requesting Agency recognized that EPA, or any other federal agency acting in conjunction with or on behalf of EPA, may use its authority under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. § 9601, *et. seq.*, the National Contingency Plan (NCP), 40 C.F.R. Part 300, or any other federal statute, regulation or response program, to respond to and recover costs incurred in response to releases or threats of releases of hazardous substances, pollutants or contaminants as deemed necessary at EPA's sole discretion to abate an imminent and substantial endangerment to public health or welfare or the environment at the location stated above. By making this Request, the Requesting Agency waives notice as otherwise required by Section 128(b)(1)(D) of CERCLA, 42 U.S.C. § 9628(b)(1)(D). The signatory of this request is authorized to make this request on behalf of the State.

Executed on **September 5, 2018**

(date)

Valerie Wilder

Name

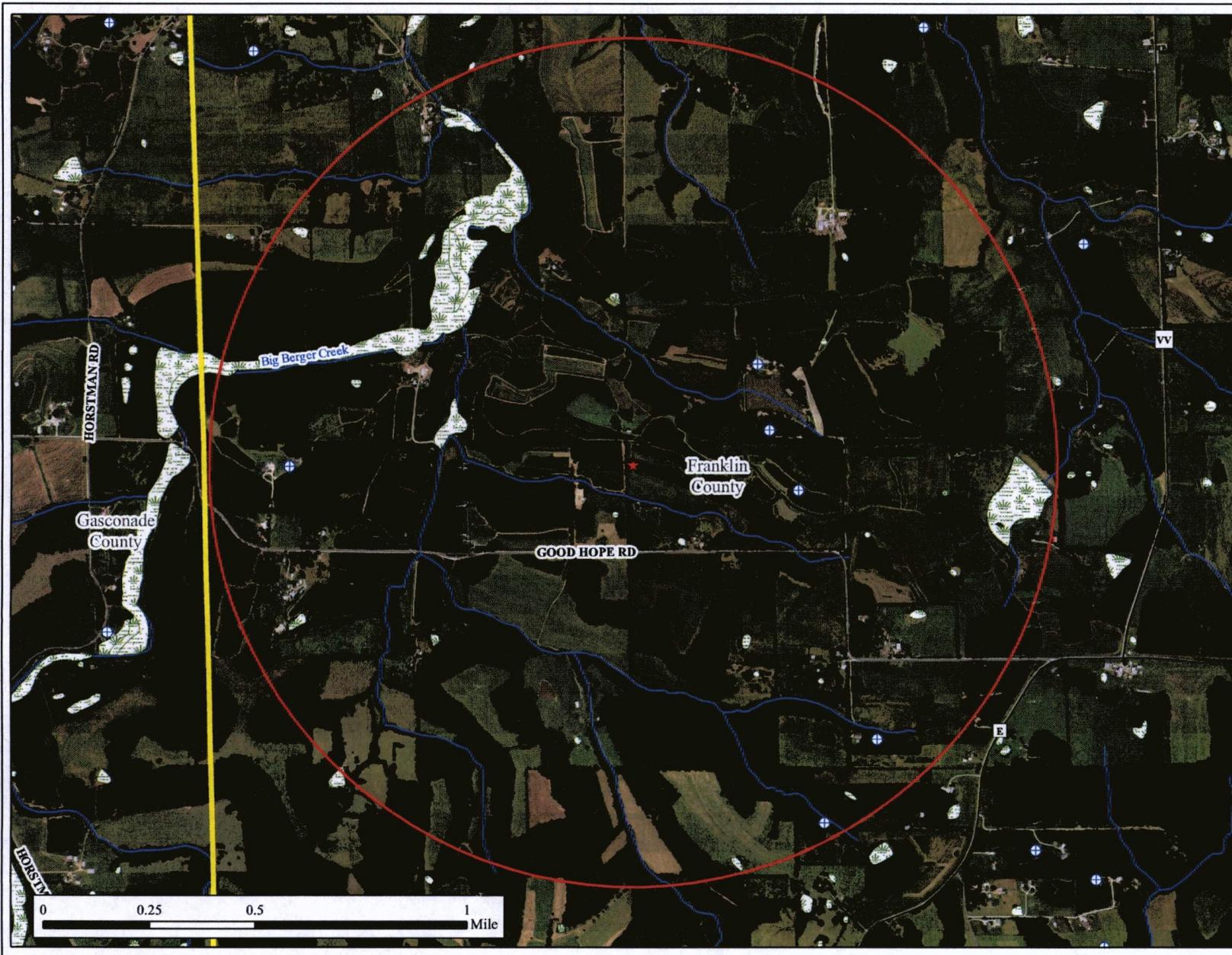
Superfund Section Chief

Title

Missouri Department of Natural Resources

State Agency

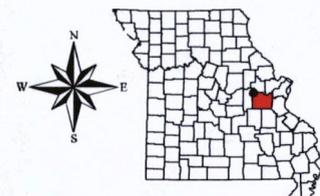
**Figure 1: Site Location Map
Good Hope Road Drums
3285 Good Hope Rd
Franklin County, Missouri**



Legend

- ★ Good Hope Road Drums Site
- ⊕ Private Drinking Water Wells
- 1 Mile Radius
- ▬ County Boundary
- ▨ National Wetland Inventory
- Local Roads
- State Numbered Highway
- Rivers and Streams

Population within one mile of site = 161

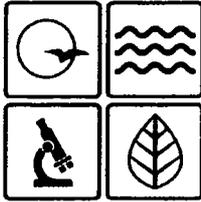


Created on: 4/9/2018 by Kyle O'Rourke. This map is located at M/Superfund/Good Hope Road Drums/One-mile_Site_Location_Map_11x17_2018

Base Map: National Agriculture Imagery Program (NAIP) ortho photography. Flight Date: 2014
Data Sources: US Census 2010; Missouri Department of Transportation

Although data sets used to create this map have been compiled by the Missouri Department of Natural Resources, no warranty, expressed or implied, is made by the department as to the accuracy of the data and related materials. The act of distribution shall not constitute any such warranty, and no responsibility is assumed by the department in the use of these data or related materials.





Missouri Department of

NATURAL RESOURCES

Eric R. Greitens, Governor

Carol S. Comer, Director

Good Hope Road Drums
Berger, Mo
Pre-CERCLA Screening
MDNR, 2018A

MEMORANDUM

DATE: April 17, 2018
TO: Good Hope Road Drums Site Reference File
FROM: Kyle O'Rourke, Site Assessment Unit (SAU) *KO*
Superfund Section, Hazardous Waste Program (HWP)
SUBJECT: Site Visit

At approximately 9:00 am on April 17, 2018, Mr. Sean Counihan and Mr. Ken Hannon, ESP/Field Services, Ms. Amanda Branson, HWP/SAU and I arrived at the residence of [REDACTED], 3285 Good Hope Road in Berger, Missouri. [REDACTED] rural property contains 86 55-gallon drums. [REDACTED] said that the drums have been on the property for at least 50 years. He stated that his neighbor had noticed them from his property and the neighbor, which was not named, had his attorney call in to Missouri Department of Natural Resources' St. Louis Regional Office to inform the Department of this drum disposal site.

ESP/Field Services and HWP/SAU staff located the drums and conducted an inventory. Five of the drums had no contents and were labeled "no sample". The rest of the 80 drums contained solid material and one drum contained a liquid of some sort. Staff observed that most of the drums containing solid material had contents escape from the bung hole of the drum.

Most of the drums were so weathered that there were no markings to tell what they contained or who produced them. Although many were without a label, Department staff were able to make out a few company names on the abandoned drums. The list of companies include: Argus Chemical Co.; Dow Corning; Cyanamid; Puritan Chemical and Rohm & Haas. Department staff left the site at approximately 12:00 pm. Staff also informed [REDACTED] that he would be contacted at a later date to inform him of future work to be done at the site such as sampling and the removal of the abandoned drums.

KO:ko

Good Hope Road Drums Site
Pre-CERCLA Screening



Photograph 1
Good Hope Road Drums Site
Franklin County, MO 63014
Photo taken 4/17/18 by
Amanda Branson,
DEQ, HWP, SPF

Overview of drum site looking North from the access road. All 86 drums are contained in the wooded area in the northeast corner of the photo.



Photograph 2
Good Hope Road Drums Site
Franklin County, MO 63014
Photo taken 4/17/18 by
Amanda Branson,
DEQ, HWP, SPF

View of dispersed drum site looking North. Environmental Services Program (ESP) staff are photographed evaluating the drums present.



Photograph 3
Good Hope Road Drums Site
Franklin County, MO 63014
Photo taken 4/17/18 by
Amanda Branson,
DEQ, HWP, SPF

View of drum piles facing North.

Good Hope Road Drums Site
Pre-CERCLA Screening

Page 2 of 8



Photograph 4
Good Hope Road Drums Site
Franklin County, MO 63014
Photo taken 4/17/18 by
Amanda Branson,
DEQ, HWP, SPF

Photo of drums dumped in a 1/8 acre wooded area. Photo taken facing North.



Photograph 5
Good Hope Road Drums Site
Franklin County, MO 63014
Photo taken 4/17/18 by
Amanda Branson,
DEQ, HWP, SPF

Blue/green solid material found in and around a leaked drum.



Photograph 6
Good Hope Road Drums Site
Franklin County, MO 63014
Photo taken 4/17/18 by
Amanda Branson,
DEQ, HWP, SPF

A rusted 55 gallon drum with contents leaking out from bung hole.

Good Hope Road Drums Site
Pre-CERCLA Screening



Photograph 7
Good Hope Road Drums Site
Franklin County, MO 63014
Photo taken 4/17/18 by
Amanda Branson,
DEQ, HWP, SPF

Black sludge material found on the ground around leaked drum.



Photograph 8
Good Hope Road Drums Site
Franklin County, MO 63014
Photo taken 4/17/18 by
Amanda Branson,
DEQ, HWP, SPF

Yellow drum with black sludge material leaking from the top bung hole.



Photograph 9
Good Hope Road Drums Site
Franklin County, MO 63014
Photo taken 4/17/18 by
Amanda Branson,
DEQ, HWP, SPF

Green solid material found in and around a leaked drum

Good Hope Road Drums Site
Pre-CERCLA Screening

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Photograph 10
Good Hope Road Drums Site
Franklin County, MO 63014
Photo taken 4/17/18 by
Amanda Branson,
DEQ, HWP, SPF
Rusted drum with leaking material from
the top bung hole.



Photograph 11
Good Hope Road Drums Site
Franklin County, MO 63014
Photo taken 4/17/18 by
Amanda Branson,
DEQ, HWP, SPF
Rusted and corroded unmarked drum.



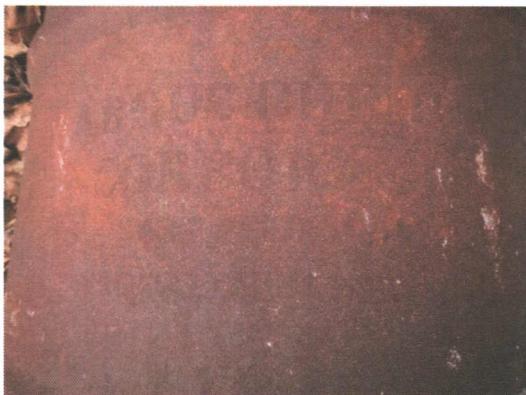
Photograph 12
Good Hope Road Drums Site
Franklin County, MO 63014
Photo taken 4/17/18 by
Amanda Branson,
DEQ, HWP, SPF
A pile of rusted drums located on the
north end of the property near the
neighboring property. Photo taken facing
the East.

Good Hope Road Drums Site
Pre-CERCLA Screening



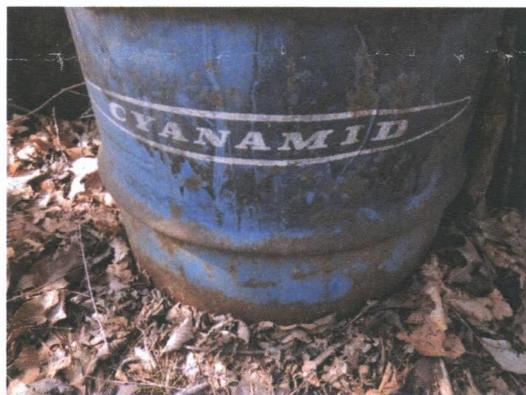
Photograph 13
Good Hope Road Drums Site
Franklin County, MO 63014
Photo taken 4/17/18 by
Amanda Branson,
DEQ, HWP, SPF

Rusted Argus Chemical Co. drum
present on site.



Photograph 14
Good Hope Road Drums Site
Franklin County, MO 63014
Photo taken 4/17/18 by
Amanda Branson,
DEQ, HWP, SPF

Rusted Argus Chemical Co. drum
present on site.



Photograph 15
Good Hope Road Drums Site
Franklin County, MO 63014
Photo taken 4/17/18 by
Amanda Branson,
DEQ, HWP, SPF

Cyanamid drum present on site.

Good Hope Road Drums Site
Pre-CERCLA Screening

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Photograph 16
Good Hope Road Drums Site
Franklin County, MO 63014
Photo taken 4/17/18 by
Amanda Branson,
DEQ, HWP, SPF

Rusted Cyanamid drum present on site.



Photograph 17
Good Hope Road Drums Site
Franklin County, MO 63014
Photo taken 4/17/18 by
Amanda Branson,
DEQ, HWP, SPF

Rusted Dow Corning Silicones,
Midland, MI drum present on site.



Photograph 18
Good Hope Road Drums Site
Franklin County, MO 63014
Photo taken 4/17/18 by
Amanda Branson,
DEQ, HWP, SPF

Rusted Dow Corning Silicones drum
present on site.

Good Hope Road Drums Site
Pre-CERCLA Screening



Photograph 19

Good Hope Road Drums Site
Franklin County, MO 63014
Photo taken 4/17/18 by
Amanda Branson,
DEQ, HWP, SPF

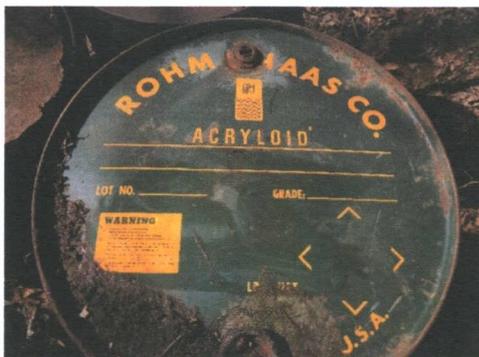
Faded & rusted Puritan Chemical
drum present on site.



Photograph 20

Good Hope Road Drums Site
Franklin County, MO 63014
Photo taken 4/17/18 by
Amanda Branson,
DEQ, HWP, SPF

Puritan Chemical drum present on
site.



Photograph 21

Good Hope Road Drums Site
Franklin County, MO 63014
Photo taken 4/17/18 by
Amanda Branson,
DEQ, HWP, SPF

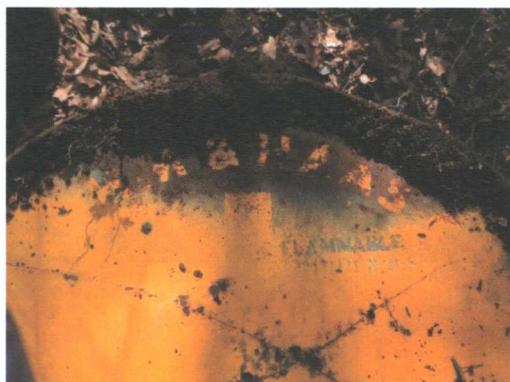
Rohm & Haas Co. drum present on
site.

Good Hope Road Drums Site
Pre-CERCLA Screening

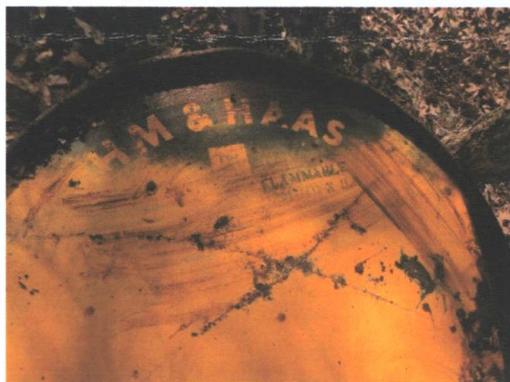
Page 8 of 8



Photograph 22
Good Hope Road Drums Site
Franklin County, MO 63014
Photo taken 4/17/18 by
Amanda Branson,
DEQ, HWP, SPF
The warning label on a Rohm & Haas
drum top present on site.



Photograph 23
Good Hope Road Drums Site
Franklin County, MO 63014
Photo taken 4/17/18 by
Amanda Branson,
DEQ, HWP, SPF
Faded Rohm & Haas drum top
present on site.



Photograph 24
Good Hope Road Drums Site
Franklin County, MO 63014
Photo taken 4/17/18 by
Amanda Branson,
DEQ, HWP, SPF
Faded Rohm & Haas drum top
present on site.

DRUM INVESTIGATION LOG SHEET

Incident #/Site name: Good Hope Drum Site Location: Franklin County

Date: 04/17/18

Drum ID	Size (gal)	Opening Type *	Condition/Integrity	% Full/Inches	Content(s) phase	PID/FID levels	Markings/Comments
20	55	2	Rusted				yellow drum, rusted through
21	55	2	Rusted				Leaking top
22	55	2	Rusted				Black drum
23	55	2	Rusted				Black drum, leaking bottom
24	55	2	Rusted				rusted drum
25	55	2	Rusted				yellow Drum
26	55	2	Rusted				yellow Drum
27	55	2	Rusted				Black drum
28	55	2	Rusted				Black drum
29	55	2	Rusted				Blue Cyanamid drum
30	55	2	Rusted				Black drum, leaking top
31	55	2	Rusted				Rohm & Haas drum
32	55	2	Rusted				Black drum, leaking from the bottom and side
33	55	2	Rusted				Rohm & Haas drum, acrylaid
34	55	2	Rusted				Rohm & Haas drum
35	55	2	Rusted				Rusted drum leaking from top bung
36	55	2	Rusted				Yellow top, "NUOD PPER" on top
37	55	2	Rusted				Blue Cyanamid drum
38	55	2	Rusted				Yellow top

* **Opening Type**

1 - ring top	4 - open top
2 - closed top (top bung)	5 - overpack
3 - closed top (side bung)	6 - other

DRUM INVESTIGATION LOG SHEET

Incident #/Site name: Good Hope Drum Site Location: Franklin County

Date: 04/17/18

Drum ID	Size (gal)	Opening Type *	Condition/Integrity	% Full/Inches	Content(s) phase	PID/FID levels	Markings/Comments
39	55	2	Rusted				Black drum, hole in the top
40	55	2	Rusted				Black drum leaking from the bung
41	55	2	Rusted				Black drum
42	55	2	Rusted				Rohm & Haas drum
43	55	2	Rusted				rusted drum
44	55	2	Rusted				yellow Drum, leaking top
45	55	2	Rusted				Black drum, leaking bottom
46	55	2	Rusted				Rohm & Haas drum
47	55	2	Rusted				Black drum, "DOT 496" on top
48	55	2	Rusted				No bung
49	55	2	Rusted				Yellow top
50	55	2	Rusted				Yellow top, bung missing
51	55	2	Rusted				Blue drum, leaking top
52	55	2	Rusted		Solid		Purtain Chemical Drum, open bottom, bright green substance
53	55	2	Rusted				rusted drum
54	55	2	Rusted				Yellow top
55	55	2	Rusted				Black drum
56	55	2	Rusted				Yellow top
57	55	2	Rusted				Black drum

* **Opening Type**

1 - ring top	4 - open top
2 - closed top (top bung)	5 - overpack
3 - closed top (side bung)	6 - other

DRUM INVESTIGATION LOG SHEET

Incident #/Site name: Good Hope Drum Site Location: Franklin County

Date: 04/17/18

Drum ID	Size (gal)	Opening Type *	Condition/Integrity	% Full/Inches	Content(s) phase	PID/FID levels	Markings/Comments
58	55	2	Rusted				Yellow top
59	55	2	Rusted				Black drum
60	55	2	Rusted				Leaking top
61	55	2	Rusted				Top bung leaking
62	55	2	Rusted				Blue drum, top bung leaking
63	55	2	Rusted				Rohm & Haas drum
64	55	2	Rusted				Yellow top, dented
65	55	2	Rusted				Blue Cyanamid
66	55	2	Rusted				Black drum, busted bottom
67	55	2	Rusted				Yellow top
68	55	2	Rusted				Black drum, missing bung
69	55	2	Rusted				Black drum, leaking bung
70	55	2	Rusted				Blue drum, leaking bung
71	55	2	Rusted				Blue drum
72	55	2	Rusted				Yellow top, bung leaking
73	55	2	Rusted				ARGU Chemicals drum
74	55	2	Rusted				Black drum, leaking bung
75	55	2	Rusted				Yellow top, leaking
76	55	2	Rusted				Blue drum

* **Opening Type** 1 - ring top 4 - open top
 2 - closed top (top bung) 5 - overpack
 3 - closed top (side bung) 6 - other

