



REGION 7

LENEXA, KS 66219

Ms. Chinwe Ndubuka
Missouri Department of Natural Resources
Superfund Division
P.O Box 176
Jefferson City, Missouri 65102-0176

Dear Ms. Ndubuka:

The U.S. Environmental Protection Agency is planning to initiate the next phase of a removal action at the Houston Wood Treatment Plant site (MOD041877309) in Houston, Missouri, to address elevated concentrations of pentachlorophenol (PCP) in soils. Post-removal site controls (PRSC) will be required to ensure the continuing effectiveness of the removal action. The purpose of this letter is to request that the State of Missouri provide a written commitment to assuming responsibility for PRSC at the site.

On October 19, 2022, the Missouri Department of Natural Resources (MoDNR) referred the site to the EPA to determine if a removal action was warranted. The EPA initiated a Removal Site Evaluation (RSE), which included a site reconnaissance, soil sampling, and liquid waste sampling. Approximately 1,500 gallons of abandoned and spent wood treatment solutions were identified and are currently being addressed through a separate removal action. Soil sampling identified PCP in surface soils exceeding the EPA's Removal Management Level (RML) based on industrial land use. The highest concentrations were near former operating areas and were consistent with observations of soil staining. The EPA is planning a removal action to address PCP-impacted soils, which may include excavation and off-site disposal. The EPA anticipates the fund-financed removal action to be complete during the Summer and Fall of 2024.

The aforementioned actions have been developed based on industrial/commercial land use and associated exposure scenarios. Following the planned removal action, contamination may remain at depth and/or in surface soils at concentrations exceeding residential use limits. For these reasons, PRSCs will be necessary to ensure the effectiveness of this removal action. PRSCs should ensure the property remains as industrial/commercial land use. The EPA recommends an institutional control be implemented and monitored to support this effort.

Consistent with 40 *Code of Federal Regulations* 300.415(l) and the EPA's 1990 Policy on Management of Post-Removal Site Controls for Fund-Financed Removal Actions, the EPA is seeking state confirmation for assumption of PRSCs before beginning the next phase of the removal action.

The EPA requests the state provide written PRSC commitment for this site. If you have any questions or need further information, please contact me at (913) 551-7868 or oconnor.daniel@epa.gov.

Sincerely,

Danny O'Connor
Supervisor
Response, Removal and Oil Planning Section
Superfund and Emergency Management Division

cc: Mikayla Morris, MoDNR
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