



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

ACTION MEMORANDUM AMENDMENT ^{30 MAY 2006}

SUBJECT: Request for a Project Ceiling Increase for the Time-Critical Removal Action at the Washington County Lead District – Old Mines Site in Washington County, Missouri

FROM: *for* James O. Silver, On Scene Coordinator *JS*
Emergency Response & Removal Branch

THRU: Scott Hayes, Chief *SH*
Emergency Response & Removal Branch

TO: Cecilia Tapia, Director
Superfund Division

CERCLIS ID#	MON000705027
Site ID#	A78K
Category of Removal	Time Critical
Nationally Significant/Precedent Setting:	No

I. PURPOSE

The purpose of this Action Memorandum Amendment is to request and document approval of a funding increase for the ongoing removal action described herein for the Washington County Lead District – Old Mines Site. The proposed action seeks to increase the project funding ceiling so the response action can continue at the Old Mines Site. The primary objective of this removal action is to eliminate or reduce potential ingestion exposure due to the presence of lead and other heavy metals in drinking water and in the soils. The original estimate for properties to be sampled was approximately 700, however, the extent of sampling has increased to 1,200 properties. Over 400 properties have been sampled, which expended the funds approved in the original Action Memorandum. This project ceiling increase request will allow for the continued sampling of residential property soils and drinking water.

II. SITE CONDITIONS AND BACKGROUND

A. Site Description

1. Removal Site Evaluation

See previously approved Action Memorandum

2. Physical Location and Site Characteristics
See previously approved Action Memorandum
3. Release or Threatened Release into the Environment of a Hazardous Substance, or Pollutant or Contaminant
See previously approved Action Memorandum
4. NPL Status
See previously approved Action Memorandum
5. Supporting Documentation

All relevant documents regarding the contamination at the site are included in the Site's Administrative Record.

B. Other Actions to Date

To date approximately 400 residential properties have had the soil and drinking water sampled. Bottled water has been provided to 44 residents. Bottled water may need to be provided to additional residents.

C. State and Local Authorities' Roles

See previously approved Action Memorandum

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT AND STATUTORY AND REGULATORY AUTHORITIES, ENDANGERMENT DETERMINATION, PROPOSED ACTIONS, AND ESTIMATED COSTS

See previously approved Action Memorandum

IV. ENDANGERMENT DETERMINATION

The actual release of a hazardous substance at this site, if not addressed by implementing the response action selected in this Action Memorandum Amendment, presents an imminent and substantial endangerment to the health of the public that comes in contact with the site and to public welfare and the environment.

V. PROPOSED ACTIONS AND ESTIMATED COST

A. Proposed Actions

See previously approved Action Memorandum

B. Estimated Costs

The costs associated with this removal action are estimated as follows:

Extramural Costs:

	Current Ceiling	Proposed Increase	Proposed Ceiling
ERRS	\$657,951	\$ 0	\$657,951
START Contractor	64,793	275,000	339,793
Contingency	<u>144,549</u>	<u>0</u>	<u>144,549</u>
Total Removal Project Ceiling	\$867,293	\$275,000	\$1,142,293

The EPA direct and indirect costs, although cost recoverable, do not count toward the total removal project ceiling for this removal action.

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Delayed action will continue to potentially expose residents, particularly children, to the contaminated soils and drinking water exceeding the federal action levels.

VII. OUTSTANDING POLICY ISSUES

None.


VIII. ENFORCEMENT

The Confidential Enforcement Addendum for this Site has not changed from the Action Memorandum signed on December 23, 2005, therefore, no Enforcement Addendum is attached to this Action Memorandum Amendment.

The total EPA costs for this removal action based on full cost-accounting practices are estimated to be \$1,142,293. The EPA direct and indirect costs, although cost recoverable, do not count toward the Removal Ceiling for this removal action.

Conditions at the Washington County Lead District – Old Mines Site meet NCP Section 300.415(b) criteria for a removal action and I recommend your approval of the \$275,000 ceiling increase to allow the removal response to continue. The removal ceiling, if approved, will be \$1,142,293. This amount comes from the Regional Removal Allowance.

Approved:


Cecilia Tapia
Director
Superfund Division

5/30/06
Date

Attachments: Action Memorandum