

**United States Environmental Protection Agency
Region VII
POLLUTION REPORT**

Date: Friday, May 7, 2004

From: Daniel Garvey

To: Scott Langel, City of Le Mars

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Subject: Le Mars Coal Gas Plant Site

331 1st Street Northeast, Le Mars, IA

Latitude: 42.7944000

Longitude: -96.1603000

POLREP No.:	3	Site #:	O7YH
Reporting Period:	May 3-7, 2004	D.O. #:	
Start Date:	4/19/2004	Response Authority:	CERCLA
Mob Date:	4/19/2004	Response Type:	Non-Time-Critical
Demob Date:		NPL Status:	Non NPL
Completion Date:		Incident Category:	Removal Action
CERCLIS ID #:	IA0001032556	Contract #	
RCRIS ID #:			

Site Description

The Le Mars Coal Gas Site (Site), in Le Mars, Plymouth County, Iowa, is a non-time critical removal action. The Site is a former manufactured gas plant (FMGP). The Environmental Protection Agency (EPA) is removing coal tar waste containing benzene, toluene, ethylbenzene, xylenes (BTEX) and polycyclic aromatic hydrocarbons (PAHs) from the Site area. The Action Memorandum for the Site was signed on September 26, 2003. The complete Administrative Record for the Site can be found at the record repository located at the Le Mars Public Library.

The Site is located at 331 1st Street Northeast, Le Mars, Plymouth County, Iowa, and is a 1.6-acre, right-triangle-shaped property, which is bordered on the northwest by the Union Pacific and Canadian National railroads, on the east by 4th Avenue Northeast, and on the south by 1st Street Northeast. The area surrounding the Site is occupied by residential and commercial properties. The Site is in Section 9, Township 92 North, Range 45 West (U. S. Geological Survey [USGS] 1985). The geographic coordinates of the Site are latitude 42°47'40" north and longitude 96°09'37" west.

Current Activities

Excavation continued on the eastern portion of the Site where two street department buildings intersect. There are three stockpiles that are being compiled on the western portion of the site. The first stockpile is severely contaminated soil destined for the thermal desorption unit. The second stockpile is considered as overburden that will be sampled and, based on analytical results, will be placed at the base of the excavated areas. The third stockpile is questionable soil that, once sampled, will likely be sent to a Subtitle D landfill.

The concrete floor was replaced inside the main street department building where the tar well had been excavated.

Also, the EPA received access to the Chicago Central and Pacific Railroad allowing light foot traffic and numerous other specified work tasks. OSC Dan Garvey called the point of contact for the railroad and provided verbal notification concerning entry as required by the agreement.

Planned Removal Actions

As stated in the Action Memorandum, approximately 14 feet of contaminated soil requires excavation down to the water table. Some de-watering may be necessary. In addition, Gas Holders A and B, the tar well, the 12,000-gallon under ground storage tank (UST) and one 2,000-gallon UST will also be removed.

The following listed steps are planned during the removal action to alleviate the human health risk posed by the Site:

- a. Air monitoring of removal action construction
- b. UST and product removal
- c. Excavation of the on-site soil source area
- d. Off-site thermal treatment of highly contaminated soil
- e. Off-site disposal of non-hazardous soil and debris in a Resource Conservation and Recovery Act(RCRA) Subtitle D landfill
- f. Backfilling with off-site soil and site restoration

Considerations are being given toward amending the action due to the denial of three Iowa Subtitle D landfills in accepting the coal tar contaminated waste. There is one Nebraska Subtitle D landfill located in Jackson that is willing to accept the waste. However, the Nebraska Department of Environmental Quality (NDEQ) requires a public notification period that would result in Site personnel demobilizing at a significant cost to the EPA and present a hardship to the city of Le Mars Street Department personnel who have re-located during the removal action. Negotiations are on-going between the EPA Emergency and Rapid Response Service (ERRS) contractor and with several thermal treatment facilities to possibly lower their initial bids if more of the contaminated material is sent to their respective facility. Also, due to seasonal fluctuations, the EPA is not encountering the water table at 14 feet below ground surface(bgs).

Next Steps

The most significant decision at this time is the disposal destination for the coal tar contaminated soil at the Site. All of the bids have been received and a final decision regarding sending all of the contaminated soil to a thermal treatment unit is being considered.

The Iowa Department of Public Health personnel had contacted OSC Dan Garvey and re-scheduled their visit for Friday, May 14, 2004. They are planning a site orientation and are available to answer any health related questions posed by concerned citizens.

Key Issues

On Wednesday, May 5, 2004, OSC Dan Garvey was accompanied by Environmental Response Team (ERT), thermal expert, JoAnn Camacho, Iowa Department of Natural Resources (IDNR), Michael Leat and Environmental Restoration Program Manager, David Brinkmeyer while visiting the DCI Environmental Inc. thermal treatment facility in Cedar Rapids, Iowa.

A complete review was performed comprising of the state issued permit specifications, handling practices and a complete tour of the facility. Both JoAnn Camacho and Michael Leat provided OSC Dan Garvey favorable recommendations following the review. This facility had been selected for this review at the conclusion of the bidding process.

Disposition of Wastes

This is the third week of the removal action. There has not been any contaminated soil sent off-site at this time. Concrete rubble has been sent to the city of Le Mars recycling location to be crushed and used as road base.

response.epa.gov/LeMarsCGS