

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

Date: Thursday, May 27, 2004

From: Kevin Turner

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Subject: Final
Resource Recovery Group (aka Clayton Chemical) Site
1 Mobile Avenue, Sauget, IL
Latitude: 38.5972740
Longitude: -90.1816870

POLREP No.:	5	Site #:	Pending
Reporting Period:		D.O. #:	
Start Date:	8/4/2003	Response Authority:	CERCLA
Mob Date:	8/1/2003	Response Type:	Non-Time-Critical
Demob Date:		NPL Status:	Non NPL
Completion Date:		Incident Category:	Removal Action
CERCLIS ID #:		Contract #	
RCRIS ID #:			

Site Description

1. Site location

The Resource Recovery Group (RRG) / Clayton Chemical Site ("Site") consists of an approximate 7.5 acre contiguous parcel within the city boundaries of Sauget, Illinois. The site is bordered by Mobile Avenue to the north, Trade Waste Incineration to the west and the American Bottoms Water Treatment to the south. Also, a multitude of above ground storage tanks (AST), process units, drum storage buildings, and an office with a laboratory constitute the facility.

2. Description of threat

An unspecified amount of liquid hazardous and nonhazardous substances remain on-site in a multitude of above ground storage tanks and associated piping, 55-gallon drums, and miscellaneous containers. Since the Site is abandoned, in a state of disrepair, and in close proximity to the Mississippi River and surrounding businesses, the remaining liquid hazardous and non-hazardous substances will be removed by the Performing Respondents identified in the Administrative Order by Consent, Docket No. V-W-03-C-720.

3. Site background

Prior to 1961, the property was owned by GM&O Railroad who utilized the property as a roundhouse. In 1961, Clayton Chemical Company leased the facility to recovery solvents and waste oils. On May 12, 1981, the Village of Sauget deeded the Site property to the Clayton Chemical Company. Clayton Chemical Company operated the facility to recycle and recover used solvents and waste oils. In November of 1996, Clayton Chemical Company discontinued operations at the Site. Between 1996 and 1998, the Site was operated as a waste oil and spent solvents recycling and recovery business by Resource Recovery Group. The Illinois Environmental Protection Agency denied a RCRA Part B permit for the Site in 1998, which halted further acceptance of hazardous and non-hazardous wastes and ceased any further activity on the Site.

4. State and local actions to date

The Clayton Chemical Company Site came to the U.S. EPA Removal Branch's attention through the

Illinois Environmental Protection Agency (IEPA). IEPA has performed routine RCRA inspections since the facility's operation in the late 1970's. IEPA deferred the Site to U.S. EPA in early 2001. U.S. EPA conducted a removal site assessment in June 2001.

Current Activities

A. Situation

1. Response activities to date

Work began at the site on August 4, 2003, with the following:

- The existing site security fence lock was replaced to control ingress and egress through the main site gate entrance.
- A portable office trailer was mobilized and set-up on-site for project command operations.
- Contamination reduction and hot zone work areas, including a decontamination facility was established.
- Sample collection activities of bulk liquids contained in ASTs began on August 6, 2003. An oil/water interface probe was used to quantify the water, oils and solvent volumes contained in each tank. Representative samples, collected from each layer, were delivered to a Clean Harbors laboratory for disposal characterization analysis.
- All drums and miscellaneous containers were opened, color coded for liquids or solids contents identification. Drums containing liquids were consolidated with like materials prior to sampling and inventory. All empty drums were staged adjacent to the former waste drum processing/storage building. Drum sampling activities were completed on August 19, 2003.
- Non-hazardous liquid waste shipments were initiated on September 3, 2003.
- A blind flange was installed to eliminate a small leak from Tank S-2 on September 2, 2003.
- Hazardous liquid waste shipments were initiated on September 27, 2003.
- Liquid laboratory waste materials were prepared for off-site disposal in accordance with TSDF lab-pack guidelines. All lab pack containers were shipped for off-site disposal on December 30, 2003.
- All 67 waste storage tanks (except Tank G-4) and associated piping have been emptied of LHS materials and cleaned with a water rinse prior to January 9, 2004.
- A change order proposal for Tank G-4 contents by the PRP group technical committee was issued to the respondents.
- Empty drums were placed into the waste drum storage building.
- A oil fired steam-heat system was used to enhance the removal of oil materials.
- A total of 810,885 gallons of liquid hazardous waste was shipped to off-site EPA approved TSDFs.
- The LHS removal contractor, Clean Harbors, completed LHS materials removal from Tank G-4 on May 14, 2004 and demobilized all manpower and equipment resources on May 17, 2004 after a final site walk.

Planned Removal Actions

- No other LHS shipments are expected as all LHS materials have been removed. Residual materials contained in tanks that are solid or impacted soils will be removed during future enforcement activities and removals actions. Future removal activities will not be associated with this TDD assignment.

Next Steps

- None. All LHS removal site activities are completed.

Key Issues

- None

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
RST/START	\$28,575.00	\$24,612.32	\$3,962.68	13.87%
Intramural Costs				
USEPA - Direct (Region, HQ)	\$6,000.00	\$5,340.00	\$660.00	11.00%
Total Site Costs	\$34,575.00	\$29,952.32	\$4,622.68	13.37%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

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