

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Former Carter White Lead Facility/Area - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region VII

Subject: POLREP #2
Progress POLREP
Former Carter White Lead Facility/Area
NEN000704909
Omaha, NE
Latitude: 41.2841000 Longitude: -95.9032000

To:
From: Michael Davis, OSC
Date: 9/19/2012
Reporting Period: 9/1/2012 - 9/14/2012

1. Introduction

1.1 Background

Site Number:	NEN000704909	Contract Number:	
D.O. Number:		Action Memo Date:	6/5/2012
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	PRP	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	00
Mobilization Date:	8/21/2012	Start Date:	8/21/2012
Demob Date:		Completion Date:	
CERCLIS ID:	NEN000704909	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

This is a potentially responsible party-lead (PRP), time-critical removal action at the Former Carter White Lead Site (Site). The Site is a former lead-based white pigment manufacturing facility which occupies a city block in east Omaha, Douglas County, Nebraska. Investigations conducted by the U.S. Environmental Protection Agency (EPA) determined that lead-contaminated soil is present at the Site, which is the subject of this removal action. As detailed below, the objective of this removal action is to protect public health and the environment by responding to the release of hazardous substances into the environment as presented by soils contaminated with lead.

1.1.2 Site Description

The former Carter White Lead facility manufactured lead-based white paint pigments from 1881 to 1926, when the company ceased operations. In the early 20th century, the daily output of the facility was about 32,000 pounds of white lead. No portion of the site is currently or has ever been owned by any federal agency. No state or local government body has been an owner or operator of any facility or operation which contributed to contamination at the Site. There have been no previous removal actions taken at the Site.

Refer to POLREP #1 for additional details regarding the current development and use of the Site.

1.1.2.1 Location

The Site is located in the city of Omaha, Nebraska, between North 21st Street East and North 22nd Street East, and East Locust Street and Avenue J, in the southwest one-quarter of Section 12, Township 15 North, Range 13 East (U.S. Geological Survey 1994). The approximate geographic coordinates of the subject property are 41.2841 degrees north latitude and 95.9032 degrees west longitude.

Refer to POLREP #1 for additional details regarding the Site location and surrounding land use.

1.1.2.2 Description of Threat

Based on the results of sampling, a soil release associated with known activities at the Former Carter White Lead facility has been established. The contaminant of concern at the Site is lead. Soil contamination is widespread across the footprint of the former facility boundaries and extends to a depth of approximately 4 to 5 feet below ground.

Lead is listed as a hazardous substance pursuant to 40 CFR § 302.4. As such, it is a "hazardous substance" as defined in section 101(14) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. § 9601(14).

Refer to POLREP #1 for additional details regarding threats at the Site.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

There have been several past investigations at the Site. Lead has been detected in surface soils and subsurface soils, with maximum concentrations around 22,000 mg/kg. Lead concentrations decreased significantly at depths below 4 feet bgs. Sampling from adjacent properties and at background locations indicates that the area of soil contamination does not extend appreciably beyond the footprint of the Former Carter White Lead facility.

Refer to POLREP #1 for additional details regarding prior investigations results.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

The EPA entered into an Administrative Settlement Agreement and Order on Consent ("AOC"), CERCLA-07-2012-0053, with NL Industries, Inc., and approved a Time Critical Removal Action Work Plan ("Work Plan"), dated June 20, 2012, incorporated into the AOC by reference. The Work Plan outlines the actions to meet the removal objectives outlined in this POLREP and the June 5, 2012 Action Memorandum issued by the EPA. The Work Plan, the Action Memorandum, and related documentation pertinent to the administrative record for this Site may be viewed on the project website at <http://www.epaosc.org/formercarterwhite>.

The cleanup crew was mobilized on August 21, 2012. On-site cleanup activities are underway. Refer to POLREP #1 for additional details regarding the response actions being implemented at the Site.

2.1.2 Response Actions to Date

On-site response actions from September 1 through September 14 consisted of treating excavated soil using a stabilizing amendment and transporting the treated waste to the designated disposal facility. In accordance with the approved Work Plan, soil was consolidated for waste characterization in 250 cubic yard batches. One four-point composite sample was collected from each stockpile for analysis by EPA SW-846 Method 1311, Toxicity Characteristic Leachate Procedure (TCLP). Analytical results were received for all stockpiles during this reporting period, with TCLP results ranging from 6.8 mg/L to 130 mg/L. Based on these results, all excavated soil on-site was determined to be characteristically hazardous waste as defined by 40 CFR 261.24, requiring treatment prior to land disposal. Waste treatment operations were conducted September 7 through September 11 by physically mixing EnviroBlend® stabilizing agent in accordance with the process outlined in the approved Removal Work Plan at a 4% ratio as determined through the site specific bench-scale testing. Following treatment of each 250 cubic yard batch, a post-treatment composite sample was collected for TCLP analysis with a 24-hour laboratory turnaround. Post-treatment sample results were received for all but one treated stockpile during this reporting period, with results for all samples showing non-detectable levels of lead in leachate following treatment.

On September 12, 2012, waste hauling began to the Butler County Landfill in David City, Nebraska. A total of 12 trucks were running and operated under subcontract with the landfill. The landfill is running 12 or 13 double trucks consisting of 15-cubic-yard tandem-axle dumps pulling a 10-cubic-yard trailer. Due a nearly 4-hour round trip to the disposal facility, only two runs were completed on September 12. Loading and hauling continued in similar fashion for the remainder of this reporting period, although on September 13 and 14 an earlier start allowed for three runs each day.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

An Administrative Settlement Agreement and Order on Consent, CERCLA-07-2012-0053, was established between NL, the EPA and Moweco, Inc., effective August 7, 2012. ODM is a property owner and has provided access to complete the removal action as well an Environmental Covenant for implementation of Post-Removal Site Controls. Moweco filed a similar environmental covenant for the parcels under their ownership.

2.1.4 Progress Metrics

The following waste quantities are volume estimates based on treated stockpile dimensions. After weight tickets are received and reviewed from the disposal facility, this information will be revised to reflect an accurate waste quantity in tonnage.

Waste Stream	Medium	Quantity	Manifest #	Treatment	Disposal
EPA Toxic Soil	Solid	1500 cu yds	multiple	stabilization	MSWLF

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

During the next reporting period, the final round of post-treatment confirmation samples will be received, and waste soil will continue to be loaded and hauled to the designated off-site disposal facility. Following load-out of the initial 12" lift, excavation of the the 24" lift will begin in the 1,400-square-foot "garden area" as defined in the Removal Work Plan. Following completion of all excavation activities, the post-excavation topography will be surveyed to ensure the removal objectives have been satisfied. Brightly colored demarcation barrier will then be placed in the excavation base, and the Site will be backfilled in accordance with the Removal Work Plan.

During the next reporting period the EPA will collect a sample of a viscous tar-like substance that was observed pooling inside the sand blasting room, apparently rising up from subslab through cracks in the shop floor and also through cracks in the foundation to soil outside the south wall of the FleetPride building. Refer to POLREP #1 for a description of this waste.

2.2.1.2 Next Steps

Complete Site cleanup.

2.2.2 Issues

N/A

2.3 Logistics Section

The scope of this response does not warrant a structured incident management team (IMT), and there is no Logistics Section Chief or separate logistics section. No logistical issues are anticipated at this time.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

2.5.1 Safety Officer

The safety officer on-site is Josh Carroll with ENTACT. No safety issues have been observed by the OSC, and no significant safety incidents have occurred at this time.

2.5.2 Liaison Officer

The scope of this response does not warrant a structured IMT, and there is no Liaison Officer assigned.

2.5.3 Information Officer

Belinda Young is the EPA Public Information Officer (PIO) assigned to this project. Refer to POLREP #1 for a detailed description of the public involvement activities conducted by the PIO.

3. Participating Entities

3.1 Unified Command

The limited scope of this removal action does not warrant a Unified Command.

3.2 Cooperating Agencies

NDEQ and the City of Omaha have assisted in the planning and implementation of this removal action.

4. Personnel On Site

Beyond the EPA OSC, the composition and staffing of on-site personnel to implement this removal action is determined by the PRP and the designated contractor representative, namely Josh Carroll, the ENTACT Field Project Manager, and Kevin Lombardozzi, the NL Industries Project Coordinator. In general, field personnel consist of the Field Project Manager, one equipment operator, one analytical technician, and three laborers.

5. Definition of Terms

N/A

6. Additional sources of information

6.1 Internet location of additional information/report

<http://www.epaosc.org/formercarterwhite>

6.2 Reporting Schedule

The next operational period will be September 15 - September 30, 2012. A progress POLREP will be completed covering that period.

7. Situational Reference Materials

N/A