

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 #3**
Progress POLREP
Former Carter White Lead Facility/Area
NEN000704909
Omaha, NE
Latitude: 41.2841000 Longitude: -95.9032000

To:
From: Michael Davis, OSC
Date: 10/1/2012
Reporting Period: 9/15/2012 - 9/30/2012

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, and 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 15 through September 30 consisted of completion of all excavations and treatment of soil using a stabilizing amendment and transporting the treated waste to the designated disposal facility. Following load-out of the initial 12" lift, excavation of the the 24" lift was completed in the 1,400-square-foot "garden area" as defined in the Removal Work Plan. Following completion of excavation activities, the post-excavation topography was surveyed to ensure the removal objectives were met. Brightly colored demarcation barrier was placed in the excavation base, and the Site was backfilled in accordance with the Removal Work Plan (i.e. 3/8" minus crushed rock, and then topped with a minimum of 6 inches of limestone gravel or 12 inches of topsoil in the garden area). The grassy area at the southwest corner of 2107 East Locust Street was backfilled entirely with topsoil and then revegetated with fescue blend sod.

On September 19, 2012, the EPA OSC collected 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. The sample was packaged and delivered to the EPA Region 7 laboratory on September 20.

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 as an Environmental Covenant for implementation of Post-Removal Site Controls. Moweco filed a similar environmental covenant for the parcels under its ownership.

2.1.4 Progress Metrics

The following waste quantities are accurate as of September 28, 2012, based on weigh tickets from the Butler County MSWLF disposal facility. To date, 184 loads of waste soil have been transported for disposal. A spreadsheet summarizing the disposal quantities is available for review in the supporting documents section of the project website: <http://www.epaosc.org/formercarterwhite>.

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
Toxic Hazardous Soil (Treated)	Solid	5557 tons	multiple	stabilization	MSWLF

2.2 Planning Section

2.2.1 Anticipated Activities

N/A

2.2.1.1 Planned Response Activities

During the next reporting period, the asphalt will be applied in the southeastern area of 2107 East Locust Street as specified in the approved Work Plan modifications, and the existing asphalt cap will be patched and resurfaced in a limited area as approved by the EPA. See POLREP #1 for a detailed description of the area and specifications for asphalt application. Final grading and property touch-ups will be completed in preparation for Site demob.

A final walk-through inspection is scheduled for October 5, 2012, to be attended by ODM, MOWECO, NL Industries, ENTACT, and the EPA OSC.

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 October 1 thru October 14, 2012. It is anticipated that the removal action will be completed during the next reporting period. A final POLREP will be completed.

7. Situational Reference Materials

The Work Plan, the Action Memorandum, and related reference materials pertinent to this Site may be viewed

on the project website at <http://www.epaosc.org/formercarterwhite>.