

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

Date: Friday, November 12, 2004

From: Davis, Garvey, Nold

To: Robert Sink, City of Omaha
Gordon Andersen, Missouri River Treatment Plant
Todd Davis, Nebraska Department of Environmental Quality
Michael Arends, Missouri River Treatment Plant
Bahnke Donald, U.S.E.P.A.
Bryant Burnett, U.S.E.P.A.
Kevin Mould, U.S.E.P.A.
Robert Stewart, Department of the Interior
Eric Jenkins, Fed. Emerg. Mgmt. Agency

Subject: Omaha Lead Site
Greater Omaha Nebraska Area, Omaha, NE
Latitude: 41.2033000
Longitude: -95.9308000

POLREP No.:	46	Site #:	NESFN0703481
Reporting Period:	November 8-13, 2004	D.O. #:	0006
Start Date:	3/23/2004	Response Authority:	CERCLA
Mob Date:	3/22/2004	Response Type:	Time-Critical
Demob Date:		NPL Status:	NPL
Completion Date:		Incident Category:	Removal Action
CERCLIS ID #:	NESFN0703481	Contract #	68-S7-02-04
RCRIS ID #:			

Site Description

The site is located in the Omaha metropolitan area and encompasses Council Bluffs and Carter Lake, Iowa, and east Omaha, Nebraska. All of the site activities are centered around downtown Omaha, Nebraska.

ASARCO Incorporated (ASARCO) operated a lead refinery at 500 Douglas Street in Omaha, Nebraska, for over 100 years beginning in the 1870s. The operation of the refinery ceased in 1997. As a routine part of the refinery operation, lead particles were emitted into the atmosphere at the refinery. In addition, the Gould Incorporated Lead Battery Recycling Plant located at 555 Farnam Street in Omaha was a secondary smelter of lead from discarded lead batteries. The blast furnace used to smelt the lead at the Gould plant emitted lead particles into the air from that refinery. The Gould plant closed in 1982.

Several other facilities in the Omaha area used lead in their manufacturing processes. A few of these included Carter White Lead at 21st and Locust Street which produced white lead paint bases, red lead and litharge protective coatings until 1936, Omaha Shot and Lead which later became Lawrence Shot and Lead and then became National Lead Company which manufactured lead shot by melting pig lead, Grant Storage Battery Company, Storage Battery Factory, and Exide Corporation which manufactured lead storage batteries.

Numerous other locations in the Omaha area such as foundries, iron works, metal salvaging companies and other manufacturers also used or processed lead at their facilities.

Current Activities

On March 25, 2004, an Action Memorandum Amendment was signed. This amendment changed the scope of work to include daycare facilities and elevated blood levels (EBLs) that were previously addressed under the first Action Memorandum, however, still addresses highly contaminated properties with lead-soil concentrations of 1,200 milligrams per kilogram (mg/kg) or greater.

Continued activities are being centralized from the Missouri River Treatment Plant located at 5600 S. 10th Street, Omaha, Nebraska, 68107-3501. The city of Omaha has partnered with the U.S. Environmental Protection Agency (EPA) to allow the use of a portion of the facility.

During this reporting period, there were 9 properties excavated, 7 backfilled, and 10 sodded.

As a project summary, during Phase I of the removal action, there were 32 properties completed. During Phase II there were 112 properties completed. Finally, Phase III has resulted in a total of 276 properties excavated, 271 backfilled, and 260 sodded.

Some delays pertaining to the application of the sod on some properties have been experienced, primarily due to weather delays. This has occurred semi-frequently throughout all three phases of the removal action. Continued communication with the sod sub-contractor is on-going to emphasize timing and coordination of the work tasks.

A test plot was constructed at the Missouri River Treatment Plant to evaluate the viability of hydro-seeding. The test plot area was backfilled with the exact soil currently used on properties that had a removal action completed by the EPA. An additional test plot was established in a privately owned lot at 1807 Lake Street.

Meetings were held during the reporting period concerning the Treatability Study utilizing phosphate to treat lead-contaminated soil. Representatives from Black and Veatch, EPA, Project Resources Incorporated, Environmental Restoration and the city of Omaha were present. The study area is located at the Missouri River Treatment Plant. Six residential properties have been selected to yield the lead-contaminated soil that will be used during the study. Survey pins were placed to identify the "study area" at the plant on Friday, November 12, 2004. Currently the city is verifying the underground utilities prior to the excavation of the study area.

Communications are on-going with possible hydro-seed, sub-contractors and the EPA in developing a long term strategy for hydro-seeding. Slight adjustments to the test plot area have been implemented to study different hydro-seed techniques to assure the most effective application concerning future use. A report discussing the hydro-seed techniques is being prepared.

Close coordination and co-training is being implemented with Black and Veatch contractor personnel and EPA's Mini-Superfund Technical Assessment and Response Team (MINI-START) contractor personnel concerning property sketch drawings. These drawings are utilized to characterize the contaminated areas in each property and assist to guide the clean-up process.

It should be noted that as an additional safeguard, the EPA sampled the sod that is currently being applied to all properties that have had a removal action performed. This sampling effort included analysis for total lead, herbicides, pesticides, semi-volatiles and volatile organic compounds. The resulting levels were below any levels of concern.

There has been a sufficient list of assigned properties to take the work into December 2004, completing Phase III.

Planned Removal Actions

Continued prioritization will be given to EBLs, day care facilities, and highly contaminated properties where children six years of age or younger live. All of the higher priority properties received thus far, have been completed, therefore, geographic grouping of properties has been implemented to utilize resources and to create continuity in the community.

There are currently 25 EPA Emergency and Rapid Response Service (ERRS) contractor employees and 3 MINI-START contractor personnel working extended work hours, 6 days a week. The breakdown of personnel is comprised of two excavation crews and two backfill crews. There is also a "punch list crew" that follows behind the other work teams to re-install fences and other needed repairs. Then, a local sod subcontractor lays/installs new sod on the properties. A few of the final steps include having the sod watered by the EPA for a two week period. At that point, the property owner is provided with an instruction sheet (bilingual) that explains future care steps concerning the sod and is encouraged to take over the responsibilities of care. After that, a final letter is sent to the property owner stating that the clean-up has been completed and a sketch of the property depicting the EPA assessment/actions is also provided to the property owner.

Next Steps

The greater Omaha area has received a significant amount of rainfall this year. This has resulted in minor delays concerning the sod sub-contractor, accessing backfill source areas and some erosion that has occurred involving residential yards. Drier weather conditions are expected in the area in the coming months, reducing future delays.

Key Issues

On Friday, October 29, 2004, 58 additional properties, having lead levels greater than 1,200 ppm, were assigned to the EPA removal group.

Any additional EBLs or day cares (affecting children), once received, are given the highest priority.

After the prioritized properties have been cleaned up, geographic locations will be utilized to maximize available resources concerning the greater than 1,200 ppm lead-contaminated properties. Sometimes, difficulties are encountered when attempting to contact property owners concerning scheduling to remain in a general area, however, diligent efforts toward this goal are being maintained.

On Wednesday, November 10, 2004, a reporter from the Washington Post visited the Omaha Lead site area. Robert Feild, Project Coordinator, Steve Sanders, EPA Counsel and OSC Dan Garvey provided a tour of numerous residences that were undergoing various phases of remediation.

Disposition of Wastes

All of the lead-contaminated soil that is being removed from the day cares, EBLs, and greater than 1,200 ppm properties is temporarily stockpiled at the Missouri River Treatment Plant.

The lead-contaminated soil is accumulated in 1,000 cubic-yard stockpiles. There have been 14 stockpiles of contaminated soil created and either transported or scheduled to be transported during this phase of the removal action. The 15th stockpile is being accumulated at this time.

Once a 1,000 cubic-yard pile is created, a composite sample is taken and analyzed for Toxic Characteristic Leaching Procedure (TCLP) lead and total lead analysis, in preparation for shipment.

During the last two phases of the time-critical removal action, the contaminated soil has been sent to the Loess Hills Regional Sanitary Landfill, 59722 290th Street, located in Malvern, Iowa, 51551.

response.epa.gov/OmahaLeadPhaseIV