

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Rogers Cartage Removal - Removal Polrep
Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: **POLREP #1**
Initial
Rogers Cartage Removal
B5SF
Cahokia, IL
Latitude: 38.5747362 Longitude: -90.1931801

To: Fielding Sherry, HQ
Richard Karl, Region 5
Jason El-Zien, U. S. EPA
Mark Durno, Region 5
Sam Borries, Region 5
Mike Ribordy, USEPA R5
Marc Colvin, USEPA
John Glover, U.S. EPA
Carol Ropski, U.S. EPA
Bruce Everetts, Illinois EPA
Tom Miller, Illinois EPA

From: Kevin Turner, OSC
Date: 2/4/2013
Reporting Period: 1/22/2013 - 2/1/2013

1. Introduction

1.1 Background

Site Number:	B5SF	Contract Number:	
D.O. Number:		Action Memo Date:	10/11/2011
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	PRP	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	1/21/2013	Start Date:	1/21/2013
Demob Date:		Completion Date:	
CERCLIS ID:	ILD 053981601	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Time Critical Removal Action – PCB impacted soils at an active petroleum storage and truck loading terminal from a former tanker truck company cleaning operation.

1.1.2 Site Description

The Site is 2.75 acre parcel within the bulk petroleum storage and truck loading terminal owned and operated by ConocoPhillips Pipeline Company. Rogers Cartage operated, under a lease agreement with owner ConocoPhillips Pipeline Company, a chemical product hauling business out of a 5-acre tank truck facility from approximately 1950 until 1970 in Cahokia, Illinois ("Cahokia facility"). Among the chemicals Rogers hauled was zinc, diphenol phosphates, oleums, chlorobenzene, sulfuric acid and PCBs. At its facility, Rogers ran a truck washing operation which generated waste water contaminated with residual product hauled in the trucks. Rogers stored this waste water in lagoons at the Site, and the highest levels of PCB contamination at the Site are found at the former locations of these lagoons. After its closure in 1970, no other party ever used or occupied the Rogers' facility again. The only portion of the former Rogers' facility that remains is a small concrete and asphalt pad and building foundation from previous operations.

1.1.2.1 Location

The ConocoPhillips Terminal is currently used for petroleum-related pipeline terminal activities. The Terminal is located at 3300 Mississippi Avenue in Cahokia, Illinois, west of Illinois Route 3. The Terminal is bordered by railroad lines on the east and west sides of the property. Cargill Road borders the southern edge of the property, while Hog Haven Road borders the northern property boundary. The former Roger

Cartage facility is located on the southern portion of the Terminal property, and is bordered by Cargill Road to the south, and an unnamed access road to the east, having the south gate at its southern terminus.

1.1.2.2 Description of Threat

Conditions at the Site may pose an imminent and substantial endangerment to public health or welfare or the environment, based upon factors set forth in the National Contingency Plan (NCP), 40 CFR § 300.415 (b)(2). The condition includes the existence of elevated levels of PCBs at several sampling locations within the Site. Of the PCB aroclors analyzed, PCB-1248 and PCB-1254 were detected with the most frequency. PCB-1248 was detected in most of the contaminated soil samples analyzed. Analytical samples show that PCBs are primarily located in the upper 6 feet of the soil at the Site, with the highest concentrations of PCB located in the first two feet below the surface. The highest PCB concentration in the first two feet of soil was sample SB-126, at 19,300 mg/kg (PCB 1248). The area surrounding the Site is commercial/industrial, residential and agricultural. Residents of Cahokia and the Cahokia City Hall are less than 1/4 mile southeast of the Site.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

The United States Environmental Protection Agency (EPA) has not conducted a removal assessment of the Site. Rather, all of the Site data have been provided to and reviewed by EPA.

In February 2005, ConocoPhillips conducted a shallow soil investigation for PCBs at the Site to further characterize and identify the locations of PCBs in soil above applicable remediation waste clean-up standards. The February 2005 investigation was completed to further investigate and determine if the elevated levels of PCBs that had been historically detected south of Cargill Road (within the Sauget Area One site) originally came from the former Rogers Cartage Facility and to follow up on a March 2004 investigation performed at the Facility by Pharmacia Corporation. In the spring of 2008, ConocoPhillips completed another Site investigation to further delineate the PCB contamination on its property. These investigations document concentrations of PCBs in shallow soil on the Site that are well above the PCB remediation waste clean-up standard of twenty-five (25) milligrams per kilogram (mg/kg) set forth at 40 CFR § 761.

Analytical results indicated that both surface and subsurface soils at the Site have been impacted by elevated concentrations of PCBs. The contamination exists on the ground surface and in the near subsurface where it may easily migrate via surface water runoff or become airborne. The area has been well studied from a geological perspective and has shown the soils to be of a porous, sandy nature, which would facilitate contamination migration to groundwater.

The remediation Site is within the ConocoPhillips Terminal property. Based on data obtained during the investigation activities, the remediation Site has been defined to include the investigation area is roughly rectangular shaped, consisting of approximately 2.75 acres, and borders a drainage ditch that parallels the southwest side of the ConocoPhillips Terminal and Cargill Road. The State of Illinois and ConocoPhillips removed this approximate 2.75 acre parcel of land from the Illinois Site Remediation Program (SRP) in October 2005 so the Region could take the lead in addressing the contamination at the Site.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

This removal action will be conducted in accordance with Section 104(a)(1) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. § 9604(a)(1), and 40 C.F.R. § 300.415 (Removal action) of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) to abate or eliminate the immediate threats posed to public health and/or the environment. This action is anticipated to require from four to six months to implement.

2.1.2 Response Actions to Date

On January 22, 2013, U.S. EPA mobilized START contractors to perform oversight of PCB sampling for additional delineation of PCB impacted soils. These sample results will support the forthcoming removal of impacted soils related to the former tanker truck cleaning operations at the former Rogers Cartage Site. Approximately 122 samples were taken ranging in depth from 2 inches to 14 feet below ground surface. Ultimately, the PCB impacted soils will be removed for off-site disposal.

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

U.S DOJ, U.S. EPA and ConocoPhillips negotiated a Consent Decree to govern the clean-up activities.

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
PCB Impacted Soil	Soil	None at this time		Land Disposal	Landfill

R5 Priorities Summary		
This is an Integrated River Assessment. The numbers should overlap.	Miles of river systems cleaned and/or restored	NA
	Cubic yards of contaminated sediments removed and/or capped	NA
	Gallons of oil/water recovered	NA
	Acres of soil/sediment cleaned up in floodplains and riverbanks	NA
	Acres Protected	NA
Stand Alone Assessment	Number of contaminated residential yards cleaned up	NA
	Human Health Exposures Avoided	NA
	Number of workers on site	NA
Contaminant(s) of Concern		
Contaminant(s) of Concern	PCBs	

2.2 Planning Section

U.S. EPA Emergency Response and Removals Branch will perform oversight of the investigation and delineation of PCB impacts and oversight of the forthcoming removal actions to take place in early 2013.

2.2.1 Anticipated Activities

1. Investigation Matters – Conduct oversight of the investigation and delineation of PCB impacted soils.
2. Delineation Report – Review report developed by ConocoPhillips contractor (CRA) that provides insight to the lateral and vertical limits of PCB impacts to site soils.
3. Develop and implement a plan to control, contain, and remove PCB contaminated soils at the Site, which should include, at a minimum:
 - a. Installing excavation-related access roads;
 - b. Excavating Site soils at a depth range of between 2 to approximately 12 feet below ground surface (BGS) in most locations;
 - c. Removing approximately 16,575 tons of Site soils;
 - d. Loading excavated material into over-the-road (OTR) trucks for transport to an off-site rail loading facility, where the excavated materials will be direct transferred into rail cars; and
 - e. Transporting the loaded rail cars to an approved TSCA facility in accordance with EPA's Off-Site Rule (40 CFR § 300.440).
 - f. Control access to the contaminated areas to prevent further migration of contamination, by fencing or other applicable means;
 - g. Restore excavated areas to pre-existing conditions to the extent practicable.

2.2.1.1 Planned Response Activities

Remove all PCB impacted soils for appropriate off-site disposal requirements.

2.2.1.2 Next Steps

Review report associated with the investigation of PCB impacts to site soils.

2.2.2 Issues

None at this time. However, inclement weather may create weather delays to the project schedule.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

2.4.1 Narrative

The START Technical Directive Document was issued for \$35,000 on 8/24/2012. A total of \$2,400 has been spent as of 2/1/13

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
TAT/START	\$35,000.00	\$2,496.00	\$32,504.00	92.87%
Intramural Costs				

Total Site Costs	\$35,000.00	\$2,496.00	\$32,504.00	92.87%
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* 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.

2.5 Other Command Staff

2.5.1 Safety Officer

Safety Meetings are held every morning and before the beginning a new work assignment.

2.5.2 Liaison Officer

2.5.3 Information Officer

3. Participating Entities

3.1 Unified Command

US EPA and ConocoPhillips are directing all work in the removal effort.

3.2 Cooperating Agencies

4. Personnel On Site

US EPA -- 1

START – 1

RP Contractor - 5

5. Definition of Terms

No information available at this time.

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.

POLREP #1 Last Updated 2/4/2013