

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region V

**Subject:** POLREP #2  
Start to the Removal of PCB Impacted Soils  
Rogers Cartage Removal  
B5SF  
Cahokia, IL  
Latitude: 38.5747362 Longitude: -90.1931801

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**From:** Kevin Turner, OSC

**Date:** 4/24/2013

**Reporting Period:** 2/1/2013 - 4/22/2013

## 1. Introduction

### 1.1 Background

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

#### 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

Please refer to Initial POLREP for details.

##### 1.1.2.1 Location

Please refer to Initial POLREP for details.

##### 1.1.2.2 Description of Threat

Please refer to Initial POLREP for details.

#### 1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Please refer to Initial POLREP for details.

## 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 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. All samples were collected by Conestoga-Rovers & Associates (CRA), on behalf of Phillips 66 Pipeline LLC (Phillips 66).

On February 15, 2013, CRA completed the PCB sampling activities.

On February 18, 2013, CRA submitted the Removal Action Work Plan (RAWP), Field Sampling Plan (FSP), Quality Assurance Project Plan (QAPP), Health and Safety Plan (HASP), and Contingency and Emergency Response Plan (CERP) to the USEPA.

On February 27, 2013 CRA submitted the supplemental Excavation Plan to the USEPA. The Excavation Plan was based upon the results of the soil sampling performed at the Site in accordance with the Sampling Delineation Plan.

On March 4, 2013, the Agency approved the RAWP, FSP, QAPP, CERP, and the Excavation Plan.

During the period of March 13 through March 31, 2013, CRA mobilized crews, equipment, and materials to the Site. CRA also prepared and improved Site roads leading to the excavation area. Temporary roads and mats were placed in the excavation area. These improvements extended the site preparation time, pushing back the excavation start date.

On April 4, 2013, CRA Field Services initiated the PCB soil excavation and truck delivery to the leased Front Street railcar siding location for trans-loading of gondolas operated by Clean Harbors. Clean Harbors can load up to six railcars per day. Railcar gondolas will then be shipped to the Clean Harbors PCB Permitted Landfill in Lone Mountain, Oklahoma.

On April 19, 2013, CRA Field Services loaded the first truck of PCB impacted soil destined for delivery to the Heritage Environmental Services, Roachdale, Indiana, Landfill. This landfill is permitted to accept PCB Mega-Rule managed waste streams.

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

U.S DOJ, U.S. EPA and Phillips 66 negotiated a Consent Decree (CD) 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 and Debris	Soil and debris	8384.99 tons	NA	Land Disposal	Clean Harbors, Lone Mountain, Oklahoma, LLC, Landfill
PCB Impacted Soil and Debris (PCB Mega Rule)	Soil and debris	119.69	NA	Land Disposal	Heritage Environmental Services, Roachdale, Indiana, Landfill

<b>R5 Priorities Summary</b>		
This is an Integrated River Assessment.	Miles of river systems cleaned and/or restored	NA
	Cubic yards of contaminated sediments removed and/or capped	19,000 tons
	Gallons of oil/water recovered	NA
	Acres of soil/sediment cleaned up in floodplains and riverbanks	4.75
Stand Alone Assessment	Acres Protected	22
	Number of contaminated residential yards cleaned up	0
	Human Health Exposures Avoided	3.14

	Number of workers on site	30
Contaminant(s) of Concern		
Contaminant(s) of Concern	Polychlorinated biphenyl (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 removal actions to take place in the Spring of 2013.

### 2.2.1 Anticipated Activities

1. Removal of PCB Impacted Soils – Conduct oversight for the removal of PCB impacted soils in a manner such to control, contain, and remove PCB contaminated soils at the Site, which should include, at a minimum:
  - a. Installing/maintaining excavation-related access roads (Dura-Mat) and other haul roads located inside the Phillips 66 Terminal Property;
  - b. Excavating Site soils at a depth range of between 2 to approximately 14 feet below ground surface (BGS) as specified in the Excavation Work Plan Supplement;
  - c. Removing approximately 16,575 tons or more 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. Loading excavated material into over-the-road (OTR) trucks for transport to an off-site PCB permitted landfill.
  - f. Transporting the loaded rail cars and/or trucks to an approved TSCA/PCB Mega-Rule facility in accordance with EPA's Off-Site Rule (40 CFR § 300.440).
  - g. Control access to the contaminated areas to prevent further migration of contamination, by fencing or other applicable means;  
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

Conduct oversight to the removal, transportation and disposal of PCB impacted soils.

#### 2.2.2 Issues

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

Also, railcar transportation arrangements have a limited window of time available due to other obligations. The rapidly rising Mississippi River Stage could create a sharp rise in the localized groundwater within the site excavation.

## 2.3 Logistics Section

No information available at this time.

## 2.4 Finance Section

No information available at this time.

## 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

U.S. EPA and Phillips 66 are directing all work in the removal effort.

### 3.2 Cooperating Agencies

## 4. Personnel On Site

US EPA – 1

START – 1

Phillips 66 – 2

RP Contractors

Operators – 3

Laborers – 4

Field Team Leader – 1

Oversight/Safety/Support – 6

Security - 1

## **5. Definition of Terms**

ATSDR – Agency for Toxic Substances and Disease Registry

CERCLA – Comprehensive Environmental Response, Compensation, and Liability Act

CERP – Contingency and Emergency Response Plan

CD – Consent Decree

CRA – Conestoga-Rovers & Associates

FPN – Federal Project Number

FSP – Field Sampling Plan

HASP – Health and Safety Plan

IEPA – Illinois Environmental Protection Agency

NA – Not Applicable/Available

NCP – National Oil and Hazardous Substances Pollution Contingency Plan

OSC – On-Scene Coordinator

PCBs – Polychlorinated biphenyl(s)

Phillips 66 – Phillips 66 Pipeline LLC, aka: ConocoPhillips

POLREP – Pollution Report

QAPP – Quality Assurance Project Plan

PRP – Potentially Responsible Party

QAPP – Quality Assurance Project Plan

RP – Responsible Party

RAWP – Removal Action Work Plan

START – Superfund Technical Assessment and Response Team

## **6. Additional sources of information**

No information available at this time.

## **7. Situational Reference Materials**

No information available at this time.