United States Environmental Protection Agency
Region VII
POLLUTION REPORT

Date: Saturday, December 4, 2004
From: Davis, Garvey, Nold

To:
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Todd Davis, Nebraska Department of Environmental Quality
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Eric Jenkins, Fed. Emerg. Mgmt. Agency
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Robert Stewart, Department of the Interior

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

POLREP No.:	48	**Site #:**	NESFN0703481
Reporting Period:	November 29-December 4, 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 5 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 291 properties excavated, 288 backfilled, and 275 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 hydro-seeding final report has been reviewed by the EPA and is currently being revised by the EPA Mini START contractor.

It should be noted that as an additional safeguard, 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.

The EPA contractor employee who had been previously diagnosed with the chickenpox returned back to work with a doctor's release.

There was a routine pick-up that occurred this week involving another EPA contractor of Investigative Derived Waste (IDW) that is a result of the contractor performing screenings or sample events of potentially contaminated properties in the Omaha area. This small amount of sampling waste is co-mingled into the current lead- contaminated stockpiles that are accumulated.

The construction and future maintenance of the "Treatability Study Area" is still being formulated by the EPA at this time.

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 24 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, re-installing 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 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. Finally, a letter is sent to each property owner specifying that the clean-up has been completed. Attached to the letter is a sketch of the respective property depicting the EPA assessment/actions, clearly showing the property owner the work that has been completed.

Next Steps

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

Key Issues

On November 29, 2004, ERRs Delivery Order 006 was amended (increased) by $443,190. On December 2, 2004, the same delivery order was increased again by $2,910.

Discussions were held between OSC Dan Garvey and Mr. Gordon Andersen, city of Omaha, concerning the EPA's future use of the Missouri River Treatment Plant located at 5600 S 10th Street. Mr. Anderson indicated that the city was willing to extend EPA's current access agreement into 2005.

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 16 stockpiles of contaminated soil created and either transported or scheduled to be transported during this phase of the removal action. The 17th 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