

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #3
Final
Rogers Cartage Removal
B5SF
Cahokia, IL
Latitude: 38.5747362 Longitude: -90.1931801

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Date: 8/23/2013

Reporting Period: 4/23/2013 - 8/23/2013

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:	6/13/2013	Completion Date:	8/20/2013
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 was 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 were 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 remained 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 previously posed 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). Those conditions included 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 showed that PCBs were 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 reside less than 1/4 mile southeast of the Site.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

This removal action was 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.

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. Those sample results supported 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 reusable mats were placed in the excavation area.

On April 4, 2013, CRA Field Services initiated the PCB impacted soil excavation and truck deliveries to the leased Front Street railcar siding location for trans-loading of gondolas operated by Clean Harbors. Clean Harbors was permitted to load up to six railcars per day. Railcar gondolas were ultimately 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 was permitted to accept PCB Mega-Rule managed waste streams.

On May 16, 2013, CRA completed removal of PCB impacted soil. A total of 20,786.61 tons of PCB impacted soil was removed transported and disposed of at both below referenced TSDFs.

On June 13, 2013, CRA completed site restoration activities and demobilized the remaining equipment resources from the site.

As stipulated in the Consent Decree, Phillips 66 has prepared a Deed Restriction that will soon be filed with the St. Clair County Recorder's Office.

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>
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PCB Impacted Soil and Debris	Soil and debris	12,488.97 tons	NA	Land Disposal	Clean Harbors, Lone Mountain, Oklahoma, LLC, Landfill
PCB Impacted Soil and Debris (PCB Mega Rule)	Soil and debris	8,297.64 tons	NA	Land Disposal	Heritage Environmental Services, Roachdale, Indiana, Landfill

R5 Priorities Summary		
This is an Integrated River Assessment.	Miles of river systems cleaned and/or restored	NA
	Cubic yards of contaminated sediments removed and/or capped	20,786 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
	Number of workers on site	5
Contaminant(s) of Concern		
Contaminant(s) of Concern	Polychlorinated biphenyl (PCBs)	

2.2 Planning Section

U.S. EPA Emergency Response and Removals Branch performed oversight of the investigation and delineation of PCB impacts along with oversight of the removal actions that took place in the Spring and early Summer of 2013.

2.2.1 Anticipated Activities

No additional work is expected as all removal work is completed.

2.2.1.1 Planned Response Activities

No additional work is expected as all removal work is completed.

2.2.1.2 Next Steps

No additional work is expected as all removal work is completed.

2.2.2 Issues

None. All field activities are completed at this time.

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 were 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 directed all work in the removal effort.

3.2 Cooperating Agencies

4. Personnel On Site

None. All field work is completed at this time.

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 (P66) – 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.