

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

**Date:** Tuesday, September 24, 2013  
**From:** Jeff Weatherford, OSC

**Subject:** CBI Debris Removal  
Carter Carburetor  
2840 N. Spring Avenue, St. Louis, MO  
Latitude: 38.6564996  
Longitude: -90.2224316

<b>POLREP No.:</b>	4	<b>Site #:</b>	07JJ
<b>Reporting Period:</b>	08/30/13 through 09/23/13	<b>D.O. #:</b>	0018
<b>Start Date:</b>	8/26/2013	<b>Response Authority:</b>	CERCLA
<b>Mob Date:</b>	8/26/2013	<b>Response Type:</b>	Time-Critical
<b>Demob Date:</b>		<b>NPL Status:</b>	Non NPL
<b>Completion Date:</b>		<b>Incident Category:</b>	Removal Action
<b>CERCLIS ID #:</b>	M0D00822601	<b>Contract #</b>	EP-S7-13-05
<b>RCRIS ID #:</b>			

#### **Site Description**

The Carter Carburetor site includes two dilapidated buildings and two associated vacant lots in St. Louis, Missouri. The site is in an Environmental Justice community. The primary contaminants found at this site include poly-chlorinated biphenyls (PCB), trichloroethylene (TCE) and asbestos. The site is in a commercial area with residential areas nearby.

The EPA has identified two Potentially Responsible Parties (PRPs): ACF Industries and Carter Building Incorporated (hereinafter ACF and CBI). ACF was the former owner of the buildings and CBI is the current owner of the buildings. ACF has spent several million dollars identifying the extent of contamination and quantifying the potential human health risks at the site under a CERCLA Administrative Settlement Agreement and Order on Consent. ACF has prepared an Engineering Evaluation/Cost Analysis (EE/CA) laying out several cleanup alternatives for the site at four distinct areas of the site: the CBI Building, the Die Cast Area, the former aboveground TCE storage tank area, and the Willco Plastics Building. The EE/CA was finalized and submitted to the public for comment in September 2010.

After extending the public comment period several times, the EPA received numerous comments on the EE/CA. Responses to all substantial comments received from the public were documented in the site Responsiveness Summary. Taking into account comments from the community, the Region 7 Administrator signed an Action Memorandum in March 2011, documenting the appropriate removal actions to address contamination in each of the four areas described above.

In December 2011, ACF voluntarily completed installing a fence around the site to prevent unauthorized access and entry into the contaminated buildings.

The EPA completed negotiations with the PRPs and submitted the Settlement Agreements to the public for comment. Comments were received, evaluated and responsiveness summaries were prepared, and the Agreements became final.

As part of the negotiations, the EPA agreed to remove debris from the building which belonged to previous unknown tenants of the building and is potentially asbestos-contaminated. This fund lead action is being performed pursuant to an action memo signed by the Regional Administrator and concurred on by EPA Headquarters, Office of Emergency Management (OEM), due to the potential for asbestos in the debris.

#### **Current Activities**

EPA contractor crews mobilized to the site on August 26, 2013. During this reporting period, activities focused on removing debris from the CBI building. Activities began on the fourth floor where equipment (i.e., skid loaders and pallet jacks) had to be lifted with a telehandler through an opening in the wall created by the contractor crew.

During this reporting period an estimated 125 tons of non-hazardous debris, 156 cubic yards of asbestos-contaminated debris and 14 tons of recyclable material were removed from the site. Debris removal activities are complete on the third and fourth floors. Crews are currently working on removing debris from the second and first floors.

#### **Planned Removal Actions**

Planned actions include continued segregation and removal of debris from the second and first floors.

#### **Next Steps**

Continue the debris removal activities.

#### **Key Issues**

Site security and safety are continuing concerns at the site. On Friday September 6, a shooting occurred in the vicinity of the site. The St. Louis Police Department handled the incident.

A local environmental group took several photos of the site and sent them to the Regional Administrator noting concerns regarding site safety and on-site security. To address these concerns, EPA conducted a thorough review of site operations and found no apparent safety or environmental concerns. These conclusions were communicated back to the group that had expressed concern. Crews were reminded to close all outer gates when not attended.

#### **Disposition of Wastes**

Debris will be categorized as ACM and/or non-hazardous debris based on inspection and sample data. All debris will be hauled off-site to a sanitary landfill. Metal and other materials will be recycled when possible.

Waste Stream	Quantity	Manifest #	Disposal Facility
Debris	125 Tons	Tracked on-site	Landfill
ACM Debris	156 Cubic Yards	Tracked on-site	Landfill
Recyclables	14 Tons	Tracked on-site	Off-site recycling facilities

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