

United States Environmental Protection Agency
Region VII
POLLUTION REPORT

Date: Wednesday, December 4, 2013

From: Jeff Weatherford, OSC

Subject: CBI Debris Removal

Carter Carburetor

2840 N. Spring Avenue, St. Louis, MO

Latitude: 38.6564996

Longitude: -90.2224316

POLREP No.:	5	Site #:	07JJ
Reporting Period:	9/24/2013 - 12/4/2013	D.O. #:	0018
Start Date:	8/26/2013	Response Authority:	CERCLA
Mob Date:	8/26/2013	Response Type:	Time-Critical
Demob Date:		NPL Status:	Non NPL
Completion Date:		Incident Category:	Removal Action
CERCLIS ID #:	M0D00822601	Contract #	EP-S7-13-05
RCRIS ID #:			

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. Initial 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.

As of November 18, 2013 all debris described in the current Action Memorandum and the ERRS Contractor Task Order was removed from the site. Debris was either recycled or sent offsite to a disposal facility. Air monitoring for asbestos was conducted during the removal action, and no levels of concern were detected.

Contractors also secured the Willco Building and added safety railing to the openings in the CBI Building.

Contractors demobilized from the site on November 18, 2013. However, there is a pending disagreement with the Potentially Responsible Party (PRP) regarding the amount of debris to be removed from the site by EPA.

Planned Removal Actions

EPA has entered into discussions with the PRP on possible removal of additional debris.

The OSC will conduct periodic inspections of the site for possible entry by unauthorized persons. Any entry points will be secured as necessary.

Next Steps

Continue the site security activities and resolve the pending disagreement with the potentially responsible party.

Key Issues

Depending on discussions with the PRPs, additional funding may be necessary to remove additional debris from the site.

Disposition of Wastes

Debris will be categorized as ACM and/or non-hazardous debris based on inspection and sample data. All debris not recycled 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	296 Tons	Tracked on-site	Landfill
ACM Debris	116 Cubic Yards	Tracked on-site	Landfill
Recyclables	78 Tons	Tracked on-site	Off-site recycling facilities

response.epa.gov/cartercarb