

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Ellisville Site (RV007) - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region VII

Subject: POLREP #2
Progress Report
Ellisville Site (RV007)
0708
Wildwood, MO
Latitude: 38.6001000 Longitude: -90.6041000

To: David Williams, Planning & Preparedness North Section

From: Heath Smith, OSC

Date: 4/10/2014

Reporting Period: 4/2/2014 - 4/10/2014

1. Introduction

1.1 Background

Site Number:	0708	Contract Number:	EP-S7-13-05
D.O. Number:	0029	Action Memo Date:	9/26/2013
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	NPL	Operable Unit:	00
Mobilization Date:	3/24/2014	Start Date:	3/24/2014
Demob Date:		Completion Date:	
CERCLIS ID:	MOD980633010	RCRIS ID:	MOD052623717
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

CERCLA incident category: Dioxin (D)

1.1.2 Site Description

1.1.2.1 Location

The Site is located in the extreme northeast corner of the proposed Strecker Forest subdivision at 173 Strecker Road, Wildwood, Missouri, as well as a portion of the Bliss-Ellisville Site, west of the Mid-America Horse Arena at 149 Strecker Road, Ellisville, Missouri, and is approximately one acre in size. Coordinates for the site are Latitude 38.600100N, Longitude 090.604100W. The Site has also been called the "northeast area" of the proposed Strecker Forest Subdivision in prior reports.

1.1.2.2 Description of Threat

See POLREP #1 (Initial POLREP).

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

See POLREP #1 (Initial POLREP).

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

Due to the presence of elevated levels of dioxin in soil at the Site, the EPA is conducting a time-critical removal action to reduce potential exposure to nearby human populations, animals and the food chain.

2.1.2 Response Actions to Date

April 2 through 4, 2014

A significant weather system pushed through Wednesday and Thursday bringing heavy rain fall to the area and to the Site. Crews returned on Friday to make final preparations for ground breaking. This included bringing in additional material to fortify the access road. Ground breaking at the first contaminated

cell (excavation area 3, cell I) was pushed off to the week of April 7th.

April 7 through 10, 2014

Excavation began Monday April 7, 2014, after rains that fell through the morning hours tapered off.

Excavation area 3, cell H-I. Due to it's small size and location, cell I was combined with cell H. Based on prior subsurface sample results, the first lift was completed to 12 inches below ground surface (bgs). Approximately 75 cubic yards of contaminated soil was removed from cells H and I in the first lift. Samples were collected from the bottom and side walls of the excavation and have been submitted to the laboratory for analysis to determine if further excavation in cells H and I are necessary. Results are expected the week of April 14, 2014.

Excavation area 3, cell G. Excavation began on the initial lift in cell G on April 8, 2014, and is ongoing as of the writing of this pollution report. Based on prior subsurface sample results data the initial lift at cell G is 24 inches bgs. To date, approximately 200 cubic yards of contaminated material has been removed from cell G. Grey ash material was observed in cell G as well as old glass jars and bottles.

Contaminated soil is being direct loaded into the red 25 cubic yard roll-off boxes. Boxes are lined prior to filling and covered immediately after being loaded.

Air Monitoring - Air monitoring stations are established up-wind and down-wind of the work zone while crews are actively excavating. The air monitoring station consists of a photo-ionization detector (PID) as well as a particulate air monitor. The main function of the PID is to measure Volatile Organic Compounds (VOCs), although other parameters are recorded. Results of daily air monitoring are being provided at <http://www.epaossc.org/ellisville> in the documents section.

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

Enforcement options are being evaluated.

2.1.4 Progress Metrics

As of Thursday April 10, 2014, 275 cubic yards of waste has been generated at the site. Transportation and disposal of that waste is planned to occur in the upcoming weeks.

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
Dioxin	Soil	0	n/a	n/a	Lone Mountain Landfill, Waynoka, Oklahoma

2.2 Planning Section

2.2.1 Anticipated Activities

Crews will continue to work on cell G in excavation area 3. Once the initial lift has been completed and samples collected, crews will proceed into cell F of excavation area 3.

As analytical is received from samples collected post excavation, a determination will be made based off the removal criteria described in the site's action memorandum whether to backfill a cell or continue excavating deeper.

The first boxes of waste will be shipped to the selected waste management facility located in Oklahoma beginning the week of April 14, 2014.

2.2.1.1 Planned Response Activities

All dioxin contaminated soil exceeding removal action levels described in the site Action Memorandum will be excavated and transported to an approved disposal facility. Excavated areas will be backfilled and restored as close as possible to pre-existing conditions.

There are three defined areas that will require removal of elevated levels of dioxin contaminated soil in the work zone. The work zone is simply the zone in the extreme northeast corner of the proposed Strecker Forest development including a portion of the former Bliss-Ellisville Site adjacent to the Mid-America Arena (Site) in which contaminated soil will be removed. Although activity will occur along the staging areas, office and access road visible from Strecker Road, these areas are not considered the work zone, but rather the support zone.

The areas to be excavated will be divided up into multiple excavation cells based upon recorded dioxin concentration and accessibility. There are three excavation areas with composed of 12 excavation cells.

- Excavation area #1 is located north of the fence line and south of Caulks Creek and is composed of one Excavation Cell.
- Excavation area #2 is located at the northwest corner of the Mid America Arena and is composed of two excavation cells.

- Excavation area #3 is located off of the southwest end of the Mid America Arena and is composed of nine excavation cells.

Excavations will be monitored closely. As material is removed and placed into the red roll-off boxes, depths will be checked and samples collected.

A goal of zero visible dust emissions from the work zone has been established. On-site personnel will monitor excavations and apply dust suppression controls if and when necessary. Particulate air monitors will be placed upwind and downwind of the excavation. Upwind monitors will provide information on baseline ambient conditions while downwind monitors will provide information on potential emissions from the site. The particulate air monitors are being used to record daily conditions and if any issues are identified after reviewing the data they provide, changes to operations will be made. The primary control will be observation by on-site personnel of visible dust during excavations. Air monitors will only be run while crews are actively excavating and loading in the work zone.

2.2.1.2 Next Steps

The next step will be to complete excavation area 3, cell G and move into excavation area 3, cell F. Soil will be sampled to verify concentration prior to shipping off-site. Excavated areas will be sampled to verify concentration and determinations will be made based off the removal action criteria described in the Site Action Memorandum whether to excavate further or backfill the excavation.

2.2.2 Issues

No significant issues were identified during this operational period.

2.3 Logistics Section

The existing road back to the work zone was improved with a 3 to 5 inch gabion stone overlaying a black geotextile fabric. The rock and fabric are used to allow the large equipment access to the back of the property. Due to the way the work zone is situated, including site drainage, it was determined improving the existing road was the best option. In addition to on-site considerations, impacts to local residents was also considered. The path chosen allows for the least direct impact to local residential properties.

2.4 Finance Section

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$796,424.00	\$53,599.00	\$742,825.00	93.27%
TAT/START	\$217,077.00	\$37,764.00	\$179,313.00	82.60%
Contingency	\$202,700.00	\$0.00	\$202,700.00	100.00%
Intramural Costs				
Total Site Costs	\$1,216,201.00	\$91,363.00	\$1,124,838.00	92.49%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

2.5.1 Safety Officer

No safety issues were reported to the EPA by site staff.

2.5.2 Liaison Officer

A liaison officer was not required during this operational period.

2.5.3 Information Officer

The information officer for this project is:

Benjamin M. Washburn
Public Affairs Specialist
EPA Region 7
(913) 551-7364

3. Participating Entities

3.1 Unified Command

The limited span of control of this removal action does not warrant a full Incident Management Team (IMT) or Unified Command. Operations, safety, logistics, planning and finance functions will be handled by on-site project managers.

3.2 Cooperating Agencies

Coordinating agencies include: ATSDR, MDHSS, MDNR, USEPA Region 7, USEPA Headquarters and the City of Wildwood.

4. Personnel On Site

During this operational period on-site crew was composed of the following:

EPA: One On-Scene Coordinator
START: One START Project Manager
ERRS: One Response Manager, One Operator and Two Laborers

5. Definition of Terms

ATSDR	Agency for Toxic Substances and Disease Registry
bgs	Below Ground Surface
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
EPA	Environmental Protection Agency
ERRS	Emergency & Rapid Response Services Contract
MDHSS	Missouri Department of Health and Senior Services
MDNR	Missouri Department of Natural Resources
mg/L	milligrams per Liter
mg/kg	milligrams per kilogram
NCP	National Contingency Plan
NRC	National Response Center
ng/m ³	nanograms per cubic meter
NPL	National Priorities List
OSC	On-Scene Coordinator
OSHA	Occupational Safety and Health Administration
OU	Operable Unit
PID	Photo-Ionization Detector
Polrep	Pollution Report
PPE	Personal Protective Equipment
PPM	Part Per Million
PPT	Part Per Trillion
PRP	Potentially Responsible Party
RCRA	Resource Conservation and Recovery Act
RPM	Remedial Project Manager
RSE	Removal Site Evaluation
Sitrep	Situation Report
START	Superfund Technical Assessment and Response Team
VOC	Volatile Organic Compound
yd ³	Cubic Yard

6. Additional sources of information

6.1 Internet location of additional information/report

<http://www.epaosc.org/ellisville>

http://www.epa.gov/Region7/cleanup/strecker_forest/index.htm

6.2 Reporting Schedule

The Pollution Report (Polrep) serves as the OSC's record of the response actions, notifications and decisions made to support the response action. Polreps will be completed and posted as conditions warrant and at the conclusion of site activities.

7. Situational Reference Materials

Please refer to the website <http://www.epaosc.org/ellisville> for all supporting documentation.