

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region VII

Subject: POLREP #4
Progress Report
Ellisville Site (RV007)
MOD980633010
Wildwood, MO
Latitude: 38.6001000 Longitude: -90.6041000

To:
From: Heath Smith, OSC
Date: 4/23/2014
Reporting Period: 4/18/2014 - 4/24/2014

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. Removal criteria is set by the site's action memorandum. Soils exceeding 820 ppt in the upper 12 inches will be removed. At depths equal to or greater than 12 inches, removal of soils will continue until a residual dioxin concentration of less than 3 times the site-specific cleanup goal or 2,460 ppt is reached.

Samples collected at this site are being submitted to a laboratory in North Carolina for dioxin analysis. Turn-around between the time a sample is received by the laboratory and the time results are made available is 72 hours.

Dioxin contaminated waste generated at this site are being treated as F027 dioxin-bearing waste. The Universal Treatment Standard for F027 dioxin-bearing waste is 1 ppb (40 CFR § 268.48). The alternative Land Disposal Restrictions (LDR) treatment standard (40 CFR § 268.49) states that treatment to achieve constituent concentrations less than ten times the UTS is not required. Dioxin-contaminated waste generated during the removal, up to concentrations of 10 ppb 2,3,7,8-TCDD, will be transported to an off-Site RCRA-permitted hazardous waste facility located in Waynoka, Oklahoma, for proper management.

Dioxin-contaminated materials with an average concentration greater than the alternative LDR treatment standard for contaminated soil will be managed by a facility capable of meeting the UTS for F027 dioxin bearing waste.

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.

2.1.2 Response Actions to Date

April 18 through 24, 2014

1. Excavations continued in cell "A" through "F" of excavation area 3. Approximately 225 cubic yards of soil was loaded into waste containers and readied for shipment.
2. Approximately 275 cubic yards of soil was shipped to Oklahoma this week.
3. A drum carcass and other miscellaneous items consistent with a former trash pit were discovered beneath cell D/E in excavation area
4. Crews began work in excavation area 2
5. Sampled excavated areas to determine if areas had been sufficiently excavated
6. Continued particulate air monitoring and volatile organic air monitoring.

Excavation area 3, cell G. Laboratory results were received during the current operational period defining an area in cell G that will require additional excavation. The base of cell G averaged 7.6 ppt dioxin and is considered complete. Additional excavation will occur along the east sidewall of cell G.

Excavation area 3, cell F. Cell F was excavated to a depth of 24 inches bgs. Samples have been taken from the bottom of the excavated area and the sidewalls of cell F. Analytical results, expected April 25, 2014, will determine whether additional work is required or if the area will be considered complete.

Excavation area 3, cell D/E. Cell D and E were combined due to size and access issues. Excavation of the first 12 inch lift was completed on April 23, 2014. Samples were collected from the bottom of the excavation and sidewalls of the excavation. Results will be available next operational period.

Within cell's D/E a drum carcass was unearthed. Surrounding the drum carcass was stained, pungent smelling soil. Readings from the PID that measures volatile compounds remained low even though the odor was present. Samples of the stained soil will be collected and submitted for laboratory analysis to determine the proper course of action.

Excavation area 3, cell A/B/C. Cell A, B and C were combined due to size and access issues. Excavation of the first lift of cell A/B/C began on April 23, 2014, to a depth of 12 inches bgs. Additional staining was observed in the ditch connecting A/B/C with D/E in the area where the aforementioned drum carcass was discovered. Completion of cell A/B/C is pending analytical results.

Excavation area 2, cell A/B. On April 24, 2014, crews began preparing area 2 for excavation.

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.

Transportation and Disposal. To date 19 - 25 cubic yard roll-off boxes have been shipped to the Lone Mountain Landfill, Waynoka, Oklahoma.

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

Enforcement options are being evaluated.

2.1.4 Progress Metrics

As of the writing of this POLREP, progress metrics will be converted from cubic yards to tons of waste disposed.

Waste Stream	Medium	Quantity	Manifest #	Treatment	Disposal
Dioxin	Soil	242 tons	n/a	n/a	Lone Mountain Landfill, Waynoka, Oklahoma

2.2 Planning Section

2.2.1 Anticipated Activities

Completion of excavation area 3 is pending analytical results. Crews will move into excavation area 2 and begin removing soil next.

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.

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.

See POLREP #1 for a description of the three established work zones (Excavation area 1, 2 and 3).

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, move into excavation area 2, then onto excavation area 1. 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

A drum carcass was unearthed on April 23, 2014, along with stained soil with a pungent odor. Along with the drum carcass, a few other items consistent with a dump area were found, including hay and manure, feedsacks, cans/bottles, and other solid waste items. Dimensions of the area are approximately 40'x20'x5'. Soil collected from the dump area is currently being evaluated to determine if additional action is required.

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

No information available at this time.

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

On April 23, 2014, a news reporter from a local television station (KMOV) stopped by the Site and conducted a progress interview with OSC Smith.

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
LDR	Land Disposal Restrictions
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
UTS	Universal Treatment Standards
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.