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

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region VII

Subject: **POLREP #15**
Progress Report
Ellisville Site (RV007)
MOD980633010
Wildwood, MO
Latitude: 38.6001000 Longitude: -90.6041000

To:
From: Heath Smith, OSC
Date: 8/8/2014
Reporting Period: August 4 through August 8, 2014

1. Introduction

1.1 Background

Site Number:	0708	**Contract Number:**	EP-S7-13-05
D.O. Number:	0029	**Action Memo Date:**	7/24/2014
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 parts per trillion (ppt) from 0 to12 inches below ground surface (bgs) will be removed. At depths equal to or greater than 12 inches bgs, removal of soils will continue until a residual dioxin concentration of less than three 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 is being treated as F027 dioxin-bearing waste. The Universal Treatment Standard (UTS) 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

August 4 through August 8, 2014

1) Crews finalized restoration activities within the work zone.
2) Two remaining boxes of waste will be shipped off next week.
3) Site office and remaining equipment will be demobilized next week as well.

Excavation area 3, Cell H/I	**Excavation complete. Restoration complete.**
Excavation area 3, Cell G	**Excavation complete. Restoration complete.**
Excavation area 3, Cell F	**Excavation complete. Restoration complete.**
Excavation area 3, Cell D/E	**Excavation complete. Restoration complete.**
Excavation area 3, Cell A/B/C	**Excavation complete. Restoration complete.**
Excavation area 2, Cell A/B	**Excavation complete. Restoration complete.**
Excavation area 1	**Excavation complete. Restoration complete.**

Waste Box Inventory (as of August 8, 2014)

Boxes up to concentrations of 10 ppb 2,3,7,8-TCDD that have been transported to the off-site RCRA-permitted hazardous waste facility located in Waynoka, Oklahoma, for proper management: 84
Boxes awaiting shipment to Waynoka: 0

Boxes exceeding concentrations of 10 ppb 2,3,7,8-TCDD that have been transported to the off-site hazardous waste facility located in Saint-Ambroise, Quebec, for treatment and disposal: 15
Boxes awaiting shipment to Saint-Ambroise: 2

Boxes on site awaiting analytical profiling: 0

Boxes on site empty and waiting to be filled: 0

Air Monitoring - Results of air monitoring are being provided at http://www.epaosc.org/ellisville in the documents section. No additional air monitoring is planned.

Transportation and Disposal. To date 1,513 tons in 99 roll-off boxes have been shipped off site.

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

Enforcement options are being evaluated.

2.1.4 Progress Metrics

Waste Stream	***Medium***	***Quantity***	***Manifest #***	***Treatment***	***Disposal***
Dioxin	Soil	1,276 tons	multiple	n/a	Lone Mountain Landfill, Waynoka, Oklahoma
Dioxin	Soil	237 tons	multiple	thermal oxidation	RSI high temperature treatment facility, Saint-Ambroise, Quebec

2.2 Planning Section

2.2.1 Anticipated Activities

As of this operational period, contaminated soils from areas 1, 2 and 3 have been excavated. All areas have been backfilled and restored.

2.2.1.1 Planned Response Activities

Two waste boxes remain to be shipped off-site.

2.2.1.2 Next Steps

Crews and equipment will be demobilized.

2.2.2 Issues

No issues to report 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 that improving the existing road was the best option. In addition to on-site considerations, the impact on local residents was also considered. The path chosen allows for the least direct impact on 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

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 the 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.