U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Pools Prairie MPA - OU6 - Removal Polrep
Initial Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region VII

Subject: **POLREP #1**
Initial
Pools Prairie MPA - OU6
07WT
Neosho, MO
Latitude: 36.8245986 Longitude: -94.3649180

To:
From: Todd Campbell, OSC
Date: 5/12/2015
Reporting Period: 5/4/15 through 5/12/15

1. Introduction

1.1 Background

Site Number:	07WT	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	6/4/2014
Response Authority:	CERCLA	**Response Type:**	Non-Time-Critical
Response Lead:	PRP	**Incident Category:**	Removal Action
NPL Status:	NPL	**Operable Unit:**	06
Mobilization Date:	4/6/2015	**Start Date:**	5/4/2015
Demob Date:		**Completion Date:**	
CERCLIS ID:		**RCRIS ID:**	
ERNS No.:		**State Notification:**	
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category

Pools Prairie MPA (OU6) is a non-time critical PRP lead removal action with an enforcement instrument (AOC).

1.1.2 Site Description

Several operable units have been identified by the U.S. Environmental Protection Agency within the Pools Prairie Site. This particular operable unit is identified as the Manufacturing Plant and Vicinity Area, or MPA. A wooded nature preserve is adjacent to the MPA, with no residences within 1/2 mile. From approximately 1956 or 1957 until 1968, the MPA was used to manufacture rocket engines and related components. Beginning in approximately 1968 the MPA's use changed to manufacturing and testing jet airplane engines and testing and refurbishing used jet airplane engines. It was sold by the United States in 1980 and is still in active operation, being used for performance testing and refurbishing of jet and helicopter engines. The MPA consists of two primary buildings, several engine test cells, secondary buildings for chemical storage and the undeveloped surrounding property. The manufacturing facility, including all of the aforementioned buildings, is fenced (approximately 900 feet by 650 feet). The engine test cells are located on the east side of the facility and testing of engines is performed routinely in this area. The main buildings contain the office and refurbishing operations. The site is generally flat, but a gentle slope from northeast to southwest serves to direct surface water drainage from the Site. The MPA is located in the Spring River Basin north of the surface drainage divide between the Spring and Elk River Basins and east of the Grand Lake of the Cherokees Watershed.

1.1.2.1 Location

The Pools Prairie site is located in Newton County, at the southern edge of the city limits in Neosho, Missouri. The MPA is located in the northern portion of the Crowder Industrial Park at 3551 Doniphan Drive, less than 1.0 mile from the southern edge of the city of Neosho. The site is within the northwest quarter of the northwest quarter, Section 11, Township 24 North, Range 32 West. The geographic coordinates for the site are latitude 36 degrees, 49 minutes, 47.8 seconds north and longitude 94 degrees, 21 minutes, 39.3 seconds west.

1.1.2.2 Description of Threat

The historical use and storage of chlorinated solvents at the MPA for a number of different applications resulted in elevation concentrations of these chemicals in the soils and groundwater near the MPA. Trichloroethylene is the VOC detected most consistently but others include 1,2- dichlorobenzene, 1,4-dichlorobenzene, tetrachloroethylene, and cis-l,2-dichloroethene. Other VOCs detected in groundwater at the Site include tetrachloroethylene and cis-1,2-dichloroethene. These compounds are listed as hazardous substances pursuant to 40 CFR § 302.4. As such, they are "hazardous substances" as defined in section 101(14) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 42 U.S.C. § 9601 (14).

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Private parties completed a removal site evaluation for the MPA, documented in the report entitled "Removal Site Evaluation, Manufacturing Plant Area and Vicinity, Pools Prairie Site, Neosho, Missouri," dated May 17, 2006. The Removal Site Evaluation report described, among other things, areas of VOC contamination in soil and groundwater at or in the vicinity of the MPA. An estimated total of 7,100 pounds of VOC mass was identified in four primary areas of the Site. Under the terms of an administrative order on consent, private parties also completed an Engineering Evaluation/Cost Analysis (EE/CA) for the MPA, documented in the report entitled "Final Engineering Evaluation/Cost Analysis, Manufacuring Plant Area, Pools Prairie Site, Newton County, Missouri," dated January 2008. A public comment period for the EE/CA ran from April 1 to May 16, 2008; no public comments were received. The EE/CA evaluated removal action alternatives to remove VOCs detected at various source areas at the MPA. Four primary areas were identified at the MPA, based on the Removal Site Evaluation. A VOC mass was further characterized by individual chemicals, with trichloroethylene (TCE) constituting the vast majority of VOC mass at the Site. As documented in the EE/CA, these four source areas accounted for approximately 99 percent of the calculated TCE mass at the MPA, summarized as follows:

- The Chemical Storage Area (approximately 71 percent of the TCE mass);
- The former Surface Impoundment Area (approximately 4 percent of the TCE mass);
- The former Rail Spur Area (approximately 10 percent of the TCE mass); and
- The former TCE Storage Area (approximately 15 percent of the TCE mass).

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

The purpose of this action is to (1) reduce the mass of volatile organic compounds (VOCs) in source area soils, to the extent practicable; and (2) reduce potential exposures resulting from direct contact with surface soils that exceed defined risk levels. To achieve these objectives, recommended alternatives in the EE/CA outlined a combination of technologies (area dependent), including soil-vapor extraction, excavation and landfarming. By letter dated December 7, 2011, a representative of the private parties requested that the recommended alternatives described in the EE/CA be modified. The primary modifications involved an increase in the amount of excavation and landfarming in the Chemical Storage Area, with a corresponding decrease in the amount of soil-vapor extraction in that area and an increase in the amount of soil-vapor extraction in the Former. Surface Impoundment Area, with a corresponding decrease in the amount of excavation and landfarming in that area.

2.1.2 Response Actions to Date

In April 2015, PRP representatives began the process of restoring the site landfarm, clearing, and grubbing vegetation, restoring haulroads, and demolishing some of the old chemical storage area structures at the MPA in preparation to begin excavating soil by 4 May, 2015. As a result, soil excavation began as scheduled and to date approximately 900 tons of contaminated soil have been excavated and transported to the land farm for remediation.

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

The USEPA has entered into an AOC with the following which are being considered as PRPs at the site:

TDY Industries (TDY)
The Boeing Company (Boeing)
The United States Department of Defense (DOD)

2.1.4 Progress Metrics

Waste Stream	*Medium*	*Quantity*	*Manifest #*	*Treatment*	*Disposal*
Soil	solid	900 tons		landfarming	n/a

2.2 Planning Section

2.2.1 Anticipated Activities

The recommended removal action for upper residuum soils at the Former TCE Storage Area and the Former Rail Spur Area is enhanced soil-vapor extraction (SVE). The recommended removal action for upper residuum soils at the Former Surface Impoundment is enhanced SVE. The recommended removal action for upper residuum soils at the Chemical Storage Area is a combination of enhanced SVE and excavation with landfarming utilizing a previously utilized landfarm near the Components Test Area (CTA) of the Pools Prairie Site. The recommended removal action for the Former UST Area is bio venting. The recommended removal action for both the Wastewater Treatment and the Former Degreaser Area is limited SVE. The recommended removal action for lower residuum soils at the Former TCE Storage Area, the Former Rail Spur Area, the Former Surface impoundment and the Chemical Storage Area is SVE.

2.2.1.1 Planned Response Activities

Excavation of contaminated soils and transport to the landfarm, trenching and installation of SVE system with subsequent treatment via landfarming and SVE.

2.2.1.2 Next Steps

Continue to excavate and transport contaminated soils to landfarm for approximately another two weeks depending upon weather. Trencher is scheduled to mobilize on 18th of May but has been put on standby to ensure that excavation will be completed by the time the excavator is transported to the site avoiding unnecessary delays and downtime for the equipment.

2.2.2 Issues

Continued air monitoring and weather.

2.3 Logistics Section

none

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

2.5.1 Safety Officer

PRP is providing the SSO, EPA OSC will be in charge of EPA safety.

2.5.2 Liaison Officer

n/a

2.5.3 Information Officer

Brendan Corazin is the CES for the site:

(913) 551-7429

3. Participating Entities

3.1 Unified Command

n/a

3.2 Cooperating Agencies

US DOD
Mo National Guard
USACE
EPA
MDNR

4. Personnel On Site

1 - EPA OSC
1 - FTCH RM
1 - SSO
1 - Foreman
3 - truck drivers
3 - Equipment Operators

5. Definition of Terms

none

6. Additional sources of information

6.1 Internet location of additional information/report

n/a

6.2 Reporting Schedule

POLREPS will be generated weekly until further notice.

7. Situational Reference Materials

RSE
EE/CA
AR
Action Memorandum
AOC
Monthly Activity Reports