

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Former United Zinc and Associated Smelters - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region VII

Subject: POLREP #3
Former United Zinc and Associated Smelters
A78Q
Iola, KS
Latitude: 37.9244799 Longitude: -95.3999814

To: Dave Williams, EPA R7 Superfund

From: Randy Schademann, On-Scene Coordinator

Date: 10/16/2015

Reporting Period: 10/10/2015 - 10/16/2015

1. Introduction

1.1 Background

Site Number:	A78Q	Contract Number:	EP-S7-13-05
D.O. Number:	0054	Action Memo Date:	8/6/2015
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	NPL	Operable Unit:	00
Mobilization Date:	9/28/2015	Start Date:	9/29/2015
Demob Date:		Completion Date:	
CERCLIS ID:	KSN000705026	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

CERCLA Incident Category: Time-Critical Removal Action

1.1.2 Site Description

1.1.2.1 Location

The Site is located in and around the city of Iola, Allen County, Kansas. The main area of the former United Zinc property is located on the east side of Iola within a mixture of residential and commercial properties. The facility was one of several zinc and lead smelting operations in the area between 1902 and 1925. Residential and non-residential properties were contaminated with elevated levels of lead.

1.1.2.2 Description of Threat

Lead, a hazardous substance as defined by Section 101(14) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended, has been released into the soil at the Site. The primary contaminants of concern at this Site are lead and lead compounds.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Refer to PolRep #1.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

The removal action consists of excavation and proper disposal of soil and/or waste containing lead concentrations greater than 400 milligrams per kilogram (mg/kg) from properties meeting the following criteria: residential properties where a composite sample exceeds a concentration of 800 mg/kg; high child impact areas such as schools and daycare facilities where a composite sample exceeds a concentration of 400 mg/kg; and residential properties where a child with a blood lead level of 10 micrograms per deciliter ($\mu\text{g}/\text{dl}$) or greater resides and soil contains lead concentrations over 400 mg/kg. Currently, approximately 350 properties have been identified that meet these criteria. Excavated soil is transported to the Allen County Landfill, a RCRA Subtitle D landfill, and used as daily cover.

2.1.2 Response Actions to Date

Excavation and backfilling operations continued during this reporting period. Contaminated soil was excavated from the following properties last week :

<i>Property ID</i>	<i>Address</i>	<i>Date Completed</i>
2180	521 S Third	10/13/2015
2549	217 S Third	10/13/2015
2684	25 S Tennessee	10/15/2015
2662	115 S Fourth	10/15/2015
2663	28 S Kentucky	10/15/2015
2673	26 S Kentucky	10/14/2015
2536	202 S Third	10/16/2015

Additionally, the EPA continued efforts to assess properties which were not previously sampled. The EPA completed an initial reconnaissance of these 890 unsampled properties and determined that approximately 350 properties are residential and able to be sampled. To date, access has been obtained for 33 of these properties (of which 6 have been sampled). Four have declined access.

The EPA's Vickie Damm was on site this week to discuss populating the region's Residential Lead database with metrics from current activities at the site. A collaboration between the EPA, START, and ERRS will ensure prompt and accurate data transfer to the EPA's database.

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

The PRP search is ongoing. No PRP has been identified to date.

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
Lead-contaminated soil	Solid	2,409 tons	N/A	N/A	Allen County Landfill daily cover

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

Excavation and backfilling operations will continue during the next operational period. A two-member team of START contractors will continue to gain access from property owners to sample approximately 300 residential properties that have not yet been assessed. See Section 2.1.2 for additional information regarding these properties.

2.2.1.2 Next Steps

The Site was listed on the National Priorities List (NPL) on May 21, 2013. A remedial action is being planned.

2.2.2 Issues

No issues at this time.

2.3 Logistics Section

Not applicable. The Logistics Section is not activated due to the size of the removal action.

2.4 Finance Section

2.4.1 Narrative

The below accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. 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.

The Time-Critical Removal Action Memorandum with a Consistency Exemption from the 12-Month and \$2 Million Statutory Limits was approved on 08/06/2015.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$8,100,000.00	\$254,068.00	\$7,845,932.00	96.86%
START	\$500,000.00	\$23,000.00	\$477,000.00	95.40%
Intramural Costs				
USEPA - Direct	\$150,000.00	\$14,000.00	\$136,000.00	90.67%
USEPA - InDirect	\$4,393,375.00	\$146,145.00	\$4,247,230.00	96.67%
Total Site Costs				
	\$13,143,375.00	\$437,213.00	\$12,706,162.00	96.67%

* 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

The EPA Community Involvement Coordinator for the Site is Karim Dawani. An Administrative Record containing site-related documents is available for review at the following locations:

Iola Public Library
 218 E Madison Avenue
 Iola, Kansas 66749

EPA Region 7 Records Office
 11201 Renner Boulevard
 Lenexa, Kansas 66219

3. Participating Entities

3.1 Unified Command

Because of the nature of the site, a unified command structure has not been formalized. City, county, and state representatives are kept abreast of activities and issues through routine dialogue.

3.2 Cooperating Agencies

City of Iola

Allen County

Kansas Department of Health and Environment

4. Personnel On Site

EPA Personnel working on the project (not necessarily on site):

OSC Schademann

OSC Luetke

RPM Bahnke (as needed)

CIC Dawani (as needed)

EPA CNSL Roberts (as needed)

EPA Contractors

15 ERRS personnel

2 START personnel

Other Agencies

1 ATSDR representative

5. Definition of Terms

ATSDR - Agency for Toxic Substance Disease Registry

CIC - Community Involvement Coordinator

CNSL - US EPA Counsel

EPA - Environmental Protection Agency

MCL - Maximum Contaminant Level

nd - non detect

NPL - National Priorities List

OSC - On-Scene Coordinator

PRP - Potentially Responsible Party

RAL - Removal Action Level

RPM - Remedial Project Manager

SME - Subject Matter Expert

START - Superfund Technical Assessment and Response Team

µg/L - Micrograms per Liter

µg/kg - Micrograms per kilogram

µg/m³ - Micrograms per cubic meter

6. Additional sources of information

6.1 Internet location of additional information/report

Lead is a metal and has been listed as a hazardous waste (D008) in the regulations for RCRA. Lead is classified by the EPA as a probable human carcinogen and is a cumulative toxicant. The early effects of lead poisoning are nonspecific and difficult to distinguish from the symptoms of minor seasonal illnesses. Lead poisoning causes decreased physical fitness, fatigue, sleep disturbance, headache, aching bones and muscles, digestive symptoms (particularly constipation), abdominal cramping, nausea, vomiting, and decreased appetite. With increased exposure, symptoms include anemia, pallor, a "lead line" on the gums, and decreased handgrip strength.

Children are more vulnerable to lead poisoning than adults. For children, lead can damage the central nervous system, kidneys and reproductive system. At higher levels, it can cause coma, convulsions and death. Even low levels of lead are harmful and are associated with decreased intelligence, impaired neurobehavioral development, decreased stature and growth, impaired hearing acuity, and possibly high blood pressure.

For more information on lead please visit:

[ATSDR ToxFAQs](#)

7. Situational Reference Materials

No information available at this time.