

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 #4  
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:** 10/22/2015

**Reporting Period:** 10/17/2015-10/23/2015

## 1. Introduction

### 1.1 Background

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

#### 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 during this reporting period:

Property ID	Property Address	Date Excavation Complete
2586	104 S Third	10/19/2015
2518	204 S Third	10/19/2015
2353	321 S Third	10/20/2015
2225	421 S First	10/21/2015
2229	516 S Second	10/22/2015
2337	323 S Fourth	10/22/2015

A full list of properties addressed during this action is presented in the Notices section of this website. Restoration was completed at nine residences with the application of sod. 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 54 of these properties (of which 24 have been sampled). Nine have declined access.

### 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

Waste Stream	Medium	Quantity	Manifest #	Treatment	Disposal
Lead-contaminated soil	Solid	3,258 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 \***

	<b>Budgeted</b>	<b>Total To Date</b>	<b>Remaining</b>	<b>% Remaining</b>
<b>Extramural Costs</b>				
ERRS - Cleanup Contractor	\$8,100,000.00	\$356,140.00	\$7,743,860.00	95.60%
START	\$500,000.00	\$29,232.00	\$470,768.00	94.15%
<b>Intramural Costs</b>				
USEPA - Direct	\$150,000.00	\$15,000.00	\$135,000.00	90.00%
USEPA - InDirect	\$4,393,375.00	\$146,145.00	\$4,247,230.00	96.67%
<b>Total Site Costs</b>				
	\$13,143,375.00	\$546,517.00	\$12,596,858.00	95.84%

\* 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/m <sup>3</sup>	Micrograms per cubic meter

## 6. Additional sources of information

### 6.1 Internet location of additional information/report

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.

POLREP #4 Last Updated 10/27/2015