

**United States Environmental Protection Agency**  
**Region VII**  
**POLLUTION REPORT**

**Date:** Friday, November 20, 2015

**From:** Adam Ruiz, OSC

**Subject:** Progress

Carter Carburetor

2840 N. Spring Avenue, St. Louis, MO

Latitude: 38.6564996

Longitude: -90.2224316

<b>POLREP No.:</b>	16	<b>Site #:</b>	07JJ
<b>Reporting Period:</b>	11/13/2015 to 11/20/2015	<b>D.O. #:</b>	N/A
<b>Start Date:</b>	4/21/2014	<b>Response Authority:</b>	CERCLA
<b>Mob Date:</b>	4/21/2014	<b>Response Type:</b>	Non-Time-Critical
<b>Demob Date:</b>		<b>NPL Status:</b>	Non NPL
<b>Completion Date:</b>		<b>Incident Category:</b>	Removal Action
<b>CERCLIS ID #:</b>	M0D00822601	<b>Contract #</b>	EP-S7-13-06
<b>RCRIS ID #:</b>			

#### **Site Description**

The Carter Carburetor Site includes two dilapidated buildings and two associated vacant lots in St. Louis, Missouri. The Site is in an Environmental Justice community. The primary contaminants found at this site include poly-chlorinated biphenyls (PCB), trichloroethylene (TCE) and asbestos. The Site is in a commercial area with residential areas nearby.

The EPA has identified two Potentially Responsible Parties (PRPs): ACF Industries and Carter Building Incorporated (hereinafter ACF and CBI). ACF was the former owner of the buildings and CBI is the current owner of the buildings. ACF has spent several million dollars identifying the extent of contamination and quantifying the potential human health risks at the Site under a CERCLA Administrative Settlement Agreement and Order on Consent. ACF has prepared an Engineering Evaluation/Cost Analysis (EE/CA) laying out several cleanup alternatives for four distinct areas of the Site: the CBI Building, the Die Cast Area, the former aboveground TCE storage tank area, and the Willco Plastics Building. The EE/CA was finalized and submitted to the public for comment in September 2010.

After extending the public comment period several times, the EPA received numerous comments on the EE/CA. Responses to all substantial comments received from the public were documented in the site Responsiveness Summary. Taking into account comments from the community, the Region 7 Administrator signed an Action Memorandum in March 2011, documenting the appropriate removal actions to address contamination in each of the four areas described above.

In December 2011, ACF voluntarily completed installing a fence around the site to prevent unauthorized access and entry into the contaminated buildings.

The EPA completed negotiations with the PRPs and submitted the Settlement Agreements to the public for comment. Comments were received, evaluated and responsiveness summaries were prepared, and the Agreements became final.

As part of the negotiations, the EPA agreed to remove debris from the building which belonged to previous unknown tenants of the building and is potentially asbestos-contaminated. This fund-lead action was performed pursuant to an action memorandum signed by the Regional Administrator and concurred on by EPA Headquarters, Office of Emergency Management (OEM), due to the potential for asbestos in the debris.

Fund-lead debris removal actions for the CBI Building are complete.

#### **Current Activities**

During this reporting period, the PRP activities included processing debris from the demolition of the Willco and CBI buildings, continued demolition of the CBI building, and excavation of the former die cast

area. Due to rain, loading of materials from the die cast area was limited on November 16th and 17th. On November 16th, a quarterly meeting with the EPA and the Responsible Party was conducted at the Herbert Hoover Boys and Girls Club. The EPA START contractor continues to conduct air monitoring of the perimeter of the site. No readings were detected above the set action levels. By OSC estimates, the CBI building demolition is approximately 50% completed and the excavation of the former die cast area is approximately 25% completed.

#### **Planned Removal Actions**

During the next reporting period, the planned removal actions include continued processing of materials from the Willco and CBI buildings, continued excavation of soils in the former die cast area, potentially backfilling the excavated portion of the die cast area, conducting additional sampling at the site, continued installation of fence screen, and continued demolition of the CBI building. The PRPs are continuing to develop a demolition plan for cooling tower #1. The EPA START contractor will continue to conduct perimeter air monitoring.

#### **Next Steps**

The next PolRep date is scheduled for 11/25/2015.

#### **Key Issues**

The PRPs have decided to break for the Thanksgiving holiday at noon on November 25th, 2015. Work is scheduled to resume on November 30th.

#### **Disposition of Wastes**

The PRP will be responsible for removal, tracking and disposition of waste. Although EPA will oversee and report these activities, specific waste information will not be tracked in POLREPs.

[response.epa.gov/cartercarb](http://response.epa.gov/cartercarb)