

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

Date: Tuesday, April 10, 2007

From: Paul Doherty

Subject: Moberly Former Manufactured Gas Plant
501 Franklin Street, Moberly, MO
Latitude: 39.4225000
Longitude: -92.4392000

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|--------------------------|----------------------------|-------------------|
| POLREP No.: | 1 Site #: | A78Z |
| Reporting Period: | D.O. #: | |
| Start Date: | Response Authority: | CERCLA |
| Mob Date: | Response Type: | Non-Time-Critical |
| Demob Date: | NPL Status: | Non NPL |
| Completion Date: | Incident Category: | Removal Action |
| CERCLIS ID #: | Contract # | |
| RCRIS ID #: | | |

Site Description

The Moberly Former Manufactured Gas Plant (FMGP) site is located at 501 Franklin Street in the city of Moberly, Missouri. The site is approximately one acre in size and located within the Ameren Service Center. The entire service center encompasses approximately three acres and is located in a light commercial/ residential area within the city limits of Moberly.

FMGP structures are still present at the site. The main gas plant building was removed in 2002. The gas regulator station remains in the southeast corner of the site and is still in use for natural gas distribution. The governors' house is still present but not in use. The electric plant building in the center of the site is now used as a warehouse to store tools and equipment, including some power substation equipment for Ameren. Transformers and other electrical distribution equipment are stored in the open in several areas of the FMGP site. Structures associated with the production of gas are still present in the subsurface.

The Moberly FMGP was in operation as early as 1875 and continued until 1935. Ownership of the site changed to Union Electric in 1983. Union Electric is now known as Ameren. The service center is currently used by Ameren for gas and electric service distribution.

Current Activities

EPA completed a Preliminary Assessment (PA) on the Moberly FMGP site on September 1991. In 1999, the Missouri Department of Natural Resources (MDNR) Hazardous Waste Program initiated an Integrated Site Investigation/ Removal Site Evaluation (SI/RSE) for the site and requested that Environmental Protection Agency (EPA) remove the site from its archived status. After the state initiated the SI/RSE, Ameren expressed its desire to conduct the invasive field activities on the site. Ameren conducted a sampling investigation of surface and subsurface soils, groundwater and surface waters under state oversight in 2000.

Analytical results documented the presence of coal tar residuals in surface soils throughout the site at concentrations above Superfund Chemical Data Matrix (SCDM) health-based benchmarks for soil exposure, Missouri Any-Use Soil Levels (ASL) and the EPA's Region 9 Preliminary Remedial Goals (PRGs) for Industrial Soil. High concentrations of carcinogenic polycyclic aromatic hydrocarbons (PAHs) were found in the northern portion of the site in the vicinity of the old gas plant building and the gas relief holder, where samples showed concentrations as high as 1,200 parts per million (ppm) benzo(a)pyrene. Coal tar was found in the subsurface in numerous places, including several subsurface structures. Highest concentrations of volatile organic compounds (VOCs) and carcinogenic PAHs were found in soil from the relief gasholder tank, where tar-saturated soil is present within two feet of the surface. Benzene was present at 152 ppm and benzo(a)pyrene was present at 3,000 ppm in a soil sample from that location.

Toxicity Characteristic Leaching Procedure (TCLP) analysis indicated soil within the gas relief holder tank is a characteristic hazardous waste based on the characteristic of toxicity for benzene. Soil that appeared to be saturated with coal tar was also visually observed in six of the soil borings during the SI/RSE

sampling event. The investigation confirmed the presence of subsurface FMGP structures, some containing coal tar, and concluded that the soil in the vicinity of the below-grade tar handling structures was impacted by coal tar to a depth of approximately 20 feet.

No release to groundwater or surface water was found.

Planned Removal Actions

The site was referred to EPA by MDNR by letter dated June 27, 2005. Ameren has agreed to address the remediation of the site through a non-time-critical process. An engineering evaluation/cost analysis (EE/CA) was prepared by Ameren and submitted to EPA in February 2007. The EE/CA documents the need for further response actions at the Site.

Next Steps

Removal activities are planned for the summer of 2007. It is anticipated that EPA and Ameren will enter into a second Administrative Order on Consent for implementation of the response action following approval of the EE/CA.

Key Issues

none

response.epa.gov/MoberlyFMGP