

Siegel Site

I N T E R O F F I C E M E M O R A N D U M

Date: 10-Feb-1995 07:54am CST
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Subject: 2/9/95 Region V visit re Site "G"

On February 9, 1995, Keith Miller and I visited Jodi Traub, Sam Borries, and Beverly Kush of USEPA Region V Waste Management Division in Chicago, to determine how Monsanto/ USEPA might get agreement with IEPA, for Monsanto to voluntarily perform a Cap & Cover remedy for Site "G" - already initiated under a "time critical removal" action by the Emergency Removal Section of EPA.

Overall, the meeting objectives were accomplished. We continue to move forward on Site "G" toward Monsanto's execution of the preferred remedy, with the preferred oversight (Emergency Removal Group), on a "time critical" basis (completion in '95).

Summary and details are attached.

Sincerely,

D. M. Light

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February 9, 1995
USEPA Region V
Chicago

Attendees:

USEPA

Jo (Jodi) Lynn Traub
Associate Division Director
Office of Superfund

Samuel F. Borries
Environmental Scientist
Emergency Removal

Beverly Kush (Works directly for Traub)
Sauget Special Assignment

Monsanto

Keith Miller
Mike Light

MEETING SUMMARY

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- USEPA is very interested in finding a solution to IEPA resistance to the concept, and are not giving up.
 - * Objective is to provide IEPA with satisfactory responses to their concerns - but to ultimately move on.
 - The State has 3 "concerns", none of which have significant merit in the opinion of EPA (my assessment).
 - The "real" problem with the state was defined by Traub as a "trust issue" - between Monsanto and IEPA. The basis for this position by the State was vigorously challenged by Keith. EPA was encouraged to follow up with some references within the State (Mary Gade and Estep's boss, Bill Chiles) who would represent a contrary opinion vs. that of Terry Ayers and Larry Estep. Traub indicated she would follow up and that "...perhaps the problem is with Larry".
 - Actions developed in the meeting will culminate in another exchange between EPA and IEPA in approximately two weeks.
 - Meanwhile, Borries is working with Tom Martin, EPA attorney, to obtain access for Monsanto for the purpose of initiating

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surveying of site "G" before March 16 (six month deadline for "initiating work" under the current "time critical removal" action).

- EPA will propose an AOC to formalize the agreement.
- Monsanto has two actions to complete in the next two weeks to provide EPA with information to address IEPA concerns:
 - 1) An alternative analysis evaluating other remedial options, costs and why they are inferior alternates to C & C.
 - 2) An evaluation of any potential adverse impacts of the CAP on the groundwater.
(Keith will also provide EPA with the GW monitoring data from the plant, which is already in the hands of IEPA).
- An aside for this meeting but an important piece of intelligence for the future:

Beverly Kush was in the meeting based on her new assignment (apparently full time) to "...do a site-wide Sauget study... a management / planning effort...". I will follow up immediately on this and stay involved with the process.
- On groundwater and based on several indirect references, EPA seems to be of the opinion that:
 - 1) This issue can and must be deferred.
 - 2) The issue is global and very complex.
 - 3) There may never be a practical technical solution.
 - 4) Responsibility determination would be complex.

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MEETING NOTES

A conference call was held 2/8/95 between the IEPA, represented by Terry Ayers, Larry Estep, and Paul Takacs; and USEPA represented by Jodi Straub, Sam Borries, and Beverly Kush. The State represented three concerns with the current remedy proposals and the representation of that remedy as final:

- 1) Lack of data characterizing the site.
- 2) Insufficient evaluation of alternate remedies.
- 3) Unknown potential adverse impacts of the CAP on the groundwater.

Concern 1 - Characterization

Borries reported that Site "G" has had 11 borings, 6 monitoring wells, and 50 surface soil samples. In addition, the removal action response survey (?) mirrored the results of the State, except that the response survey showed Dioxin - probably the result of the fire. We know where the fill is and the depth.

Straub concluded, "I think we (EPA) can put this one to rest".

Concern 2 - Alternates

The state apparently does not want to give up the potential of various alternatives which might be imposed in the future such as:

- Dig and burn.
- Treat in place to reduce toxicity.
- Remove to a secure landfill.

EPA asked Monsanto to prepare a brief evaluation of potential alternatives; costs; incremental risk reduction; and other restrictions limiting the feasibility of each (dioxin/land ban/ etc.). Basically, we expect the document to support Cap & Cover as providing sufficient risk reduction, and all other remedies as more costly with no incremental reduction in risk.

Some recommended volume assumptions were:

- 60,000 cu. yds. of waste; 1/3 hazardous; 1/3 dioxin contaminated; 1/3 non-hazardous.
- 20,000 cu. yds. contaminated fill.
- 20 ft. of the waste in the saturated zone.

Action: Jo Hanson is working with Geraghty & Miller to prepare. G & M will outline their proposal by 2/15, in particularly the set of assumptions proposed; review and get concurrence from Borries; and complete by 2/24.

Concern 3 - Impact of the CAP on Groundwater

This one is difficult to verbalize. Generally, the question seems to be; Will the CAP adversely impact GW or the future potential to treat GW?

Some phrases used to describe the concern were:

- Impact of treatment of GW in the area...
- Modeling of impact on GW...
- Impact on gas generation...
- Impact of the leachate from the CAP and from the capped material.

Action: Jo Hanson to work with G & M to propose an approach by 2/15; review with Borries; complete the work by 2/24. The work should be sufficient to conclude that the CAP will not adversely impact GW / leachate / or gas generation.

Sector B (Contiguous to "G")

IEPA is taking a contrary position to our "good sense" proposal to include the contaminated wastes from that section of "B", underneath the "G" cap. I don't understand all of their reasons, but the bottom line is that we should not give up. We should keep trying to incorporate "B" into the scope. Traub indicated that although they had judged Sector "B" to not be "time critical", she may still be able to include it into the AOC.

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Next Steps

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- 1) Completion of the technical support documents by 2/24.
 - 2) EPA / IEPA reach agreement on approach.
 - 3) EPA will get access for Monsanto to do the Site survey.
 - 4) Completion of the CAP design.
 - 5) Negotiation of the formal AOC or some alternate.

Steve Krchma: Will we also need some formal release from the state, such as under 4Y of the state voluntary action program? Is the 4Y program a preferable alternate to an AOC?

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