



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

AUG 3 1998

Site: Clinton FMGP
ID #: MO0985816875
Break: 204
Other: 8-3-98

MEMORANDUM

SUBJECT: "EE/CA" Approval Memorandum for the Clinton, Missouri
Former Manufactured Gas Plant Site

FROM: Michael J. Sanderson, Director
Superfund Division *Carl Kattler for*

TO: Dennis Grams, P.E.
Regional Administrator

The United States Environmental Protection Agency (EPA) is recommending a non-time critical removal action at the Clinton Former Manufactured Gas Plant site (FMGP). The Clinton FMGP site is the location of a former manufactured gas plant facility in Clinton, Missouri. The site is comprised of 1.9 acres and is located in a residential and light industrial area of Clinton. The FMGP operated from 1885-1930. The site is currently used for storage of utility power poles by the site owner, Missouri Public Service (MPS), a division of UtiliCorp United. In September 1994, MPS entered into an Administrative Order on Consent (U.S. Docket No. VII-94-F-0029) with EPA to conduct a removal site evaluation (RSE) and prepare an engineering evaluation/cost analysis (EE/CA).

The RSE determined that there has been a release of carcinogenic polyaromatic hydrocarbons (cPAHs) to the surface soils on the site, and these contaminants have migrated offsite to an adjacent residential property and into a surface water drainage ditch.



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SUPERFUND RECORDS



The Missouri Department of Health (MDOH) completed a baseline risk assessment for the Clinton FMGP site using the results of the RSE. Based upon the results of the RSE and the baseline risk assessment, EPA has concluded that surface soils onsite and at the adjacent residential property are a direct contact threat to human health. A removal action addressing the contaminated surface soils would be effective in addressing the site contamination and eliminating the direct contact threat to human health. The EPA has therefore decided that a non-time critical removal action is an appropriate and necessary means to address the soils and wastes at this time.

The proposed alternative for the non-time critical removal activities will mitigate the threat posed by the surface soils. The EPA Region VII will provide oversight of the removal activities that are proposed for the spring of 1999. The MPS prepared the EE/CA for this project which describes and evaluates the various alternatives to address site remediation. The document is titled, Engineering Evaluation/Cost Analysis for the Clinton, Missouri, Former Manufactured Gas Plant Site, dated April 1998.

The EE/CA presents five response action alternatives to address remediation of soils at the Clinton FMGP site. Upon review of the EE/CA, EPA proposes the following as the preferred response for the soils:

- Surface cap installation - Surface cap installation on the site for surface soils exceeding the remediation goals. A long-term maintenance plan will be developed to provide for the future effectiveness of the cap;
- Soil excavation and disposal - Excavation of off-site soils on the residential property for surface soils exceeding the remediation goals. The excavated soil will be disposed as a special or hazardous waste at an appropriate disposal facility;

- Drainage ditch improvements - Installation of a storm sewer across the site to eliminate the potential for erosion of site surface soil into the drainage ditch; and
- Land use controls - Implementation of land use restrictions and establishment of maintenance controls to minimize the potential for exposure to contaminants on the site.

The EE/CA, in conjunction with the Administrative Record that supports EPA's preferred response alternative and Notice of Public Availability announcing EPA's preferred response alternative, will be made available for a thirty-day public comment period. After considering comments received during the public comment period, EPA will select the response alternative that will be implemented at the Clinton FMGP site and will prepare an Action Memorandum, which will document the removal action decision.

Approved: _____

Melissa R. ... Date: 8/7/98

Disapproved: _____