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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

MEMORANDUM

SUBJECT: Des Moines TCE O.P. Unit #2, December 20, 1991 Meeting With DICO

FROM: Glenn Curtis
REMD/SPFD

TO: File

The following persons attended the subject meeting.

Glenn Curtis, EPA
Dan Shiel, EPA
Craig Willis, Black & Veatch
John Strouf, DICO, Inc.
Chuck Lettow, DICO Outside Counsel
Bill Soukup, Eckenfelder

The attached agenda presents those items discussed in the meeting as described below.

I. Treatability Study

The study was described as not being as successful as originally thought. Low concentrations of contaminants were recovered and minimum pneumatic pressures were measured. A perched water table was discovered in the shallow outside the building. The affect of the extraction well in the vicinity of the building was not measured 50 feet away in the nearest monitoring well. VOC concentrations were found to be very low, below the overbank deposits. It was theorized that not a lot of DNAPL is located in the sand and gravel. If any system was to work, it may be possible that a vertical SVE system could be installed and operated to recover contaminant.

B. Phase II

1. DICO plugged the old production well on August 30, 1991, according to state regulations. Casing was filled with cement,

up to the bottom of the concrete vault. DICO made arrangements with the state to remediate this vault at the time the soil contamination around the tank was abated. A new well, MW-30, was installed 15 feet west of the old production well. A 15-foot screen was installed and water samples were collected for VOC, pesticides, PCB and total petroleum hydrocarbon analysis. The total petroleum hydrocarbon analysis would be delivered to EPA in the near future.

2. Test pit by DB-59 - Two trenches in the 50 by 50-foot area around this boring were installed. A north (45 by 8 feet deep) and south trench (30 by 7 feet deep and elongated in the east-west direction) were installed. The material was replaced after observations were made in the same manner they came out; the upper 2 feet were replaced back at the surface.

3. Chromium analysis - Several chromium analyses were collected in the vicinity of DB-12 and were labeled as HA-1 through -6. These were collected in the 0-6 inch and analyzed for tri- and hexavalent chromium. Almost all the chromium detected was trivalent.

4. Wells RI-1 through 3 sampling - Several anomalies were found in the blanks accompanying the analyses. Fourteen thousand part per billion (ppb) TCE was detected in RI-2. This led to speculation that DNAPL existed in the vicinity of this well.

5. Phase II Soil sampling - Nine soil borings were collected to the west of the aldrin tank and 15 in the northern half of the site. Ten sediment samples were collected around the south pond area and labeled A through J. These samples were collected after a review of the aerial photos of the historic drainage and in consideration of the previous soil sample locations.

The soil pile was sampled on December 11 for the three herbicides of concern and a list of other pesticides. The soil pile results will be incorporated into the RI/FS report.

C. Buildings

Two rounds of samples were conducted. The first round included 30 samples (20 wipes, 10 dusts) in Buildings A, B and C. This strategy was to provide 7 wipes and 3 dust samples per building. A second round was conducted recently of 17 dust samples in Buildings B, D, E and F. Two grams of samples were collected for the dust samples filling a wide-mouth jar approximately one-quarter full.

The northern quarter of Building D had been previously (1980?) cleaned for asbestos. This area had been used for grinding brake pads made of asbestos.

It was described that dry pesticide materials from the maintenance building were prepared in solution in the maintenance building north of the Dichem building and then pumped via pipes in liquid form to the Dichem building. The liquid material was at that time sprayed on fertilizer contained in the Dichem building.

These buildings have steam heat with a coil mechanism and fan which blows the heat out into the building. There are no ducts in these buildings.

An insulation samples was collected in the southern half of Building D and detected PCBs at 1,000 parts per million (ppm). Analysis results for PCBs are masked by dieldrin. PCBs were potentially detected at a level of 10 to 20 ppm in all of the buildings. The PCB contamination source appears to be the insulation located attached to the inside of each building roof. These buildings are Butler prefab type buildings. Building B was constructed and the insulation installed in the mid-1950s. These pre-engineered butler buildings contain yellow (cellulose), later to be confirmed as fiberglas, type insulation.

II. Removal/Remedial Action

To deal with the contamination in the building area including the aldrin tank and outside soil contamination, DICO proposed to conduct a removal action. The proposed removal action would deal with the aldrin tank in the soil immediately outside this building and the building interiors. DICO would provide information in the form of a removal site evaluation or information that would enable EPA to prepare such a report. It was estimated that DICO could be cleaning the buildings by July. The EPA discussed a removal action order on consent and preparation of an action memo which would be signed by the Regional Administrator. The action memo would be based on the removal site evaluation and followed by a removal administrative order on consent. This evaluation could be prepared over the next couple of months with the site evaluation report submitted by March 1, approximately. This evaluation report would include an assessment of the building condition; an inventory and proposed sampling program of the insulation would be conducted.

DICO is in the process of reviewing records available on the operation of these buildings and ownership of the materials

(pesticides) formulated in the buildings. Harold McCarval and his secretary are conducting this review. People formerly associated with this activity and located in the Des Moines area (retired) will be sought out and interviewed. Affidavits will be obtained from these people and submitted to EPA for evidence.

The EPA committed to determine what concerns would be presented due to the PCB contamination and how this would have to be built into the removal site evaluation process.

DICO described that there were several companies involved in providing the product to them for formulation. These companies included Chevron (Standard Oil of California) Chem Agro (Mobay), Monsanto and possibly Shell Oil. The EPA offered to become involved in the investigation if necessary. The 104(e) information request letters could be submitted to these companies to obtain additional information about the materials handled at DICO.

DICO also proposed to carve out the south pond area from the ongoing RI/FS activity and associate it with the building removal. The EPA agreed that this was a possibility. DICO indicated that they would prefer notice by letter on EPA's determination regarding this possibility.

In summary, the proposal would break out the ongoing RI/FS into a separate operable unit (No. 2) and address all areas excluding the five buildings, south pond and its drainage areas. It is proposed that the buildings' interiors and aldrin tank and soil directly outside Building C be handled as a removal action. The other soils outside these buildings, in particular the Dichem building and south pond area, would be handled as a separate operable unit (O.U. No. 4) RI/FS. The ongoing (O.U. No. 2) RI/FS would in particular include the old production building and the VOC contamination. It would also include the soil pile and vicinity.

III.-VI. RI/FS Schedule

For EPA to consider the proposed breakout of the different operable units and removal action, it was presented that an escalation of the ongoing RI/FS schedule be considered by DICO. The EPA requested that the current RI/FS be consolidated in a manner that would allow the draft FS be submitted by June 1, 1992. This was presented in consideration of the current consensus regarding the contamination in this area. The idea is that the main concerns regard area 1 and 2 VOC contamination, and the soil pile. This schedule would allow a Record of Decision document to be prepared for this operable unit (No. 2) by the fourth quarter '92 (in September).

In addition the removal site evaluation report would be prepared by DICO and delivered by March 1. It would be anticipated that the removal action would be initiated by July 1992.

Questions remain concerning EPA's needs on the removal site evaluation report. What data are necessary and is a condition inventory of the building necessary? Should the sampling of the insulation be included in the evaluation report? The EPA agreed to provide additional information and notice to DICO regarding the sampling needs. DICO should go forward on the civil research investigation to develop that particular case.

VII. Air Monitoring

DICO was advised that the most recent proposal regarding the air monitoring activities would be approved by EPA. This program called for a correction factor to include subtracting the blank values from the analyses. The EPA would provide a letter of approval to DICO in the near future.

Conclusion

1. The EPA agreed to provide the following:

a. Letter - providing direction on the breakout of various activities including the removal action. The letter would also clarify the structure of the removal site evaluation report and present an indication of the need for a building condition inventory and insulation sampling program;

b. Treatability Study Comments prepared by Black & Veatch and EPA;

c. A letter regarding the air monitoring program; and Direction regarding the PCB contamination in the buildings.

2. DICO agreed to provide the following:

a. Recent chrome data collected behind the production building;

b. MW-30 sampling and total petroleum hydrocarbon analyses;

c. The explanation for the occurrence of BTX compounds and blanks;

d. Feedback regarding completion of the RI/FS, draft FS report, to be completed by June 1, 1992.

cc: Dan Shiel, CNSL