



CALLAHAN SUBSITE UPDATE

*MRS. CALLAHAN REQUESTED PARTIAL DELETION
FROM ELLISVILLE NATIONAL PRIORITIES LIST
SUPERFUND SITE*

August 26, 2016

Environmental Protection Agency Region 7



Outline

- Summary of actions taken at Callahan subsite
- Partial deletion process
- State of Missouri recommendations
- EPA “post-removal” action evaluation
- Current status and next steps



Summary of Actions Taken

- Approximately 1,200 non-dioxin drums removed from the property
 - ▣ EPA conducted response action in 1981-82 to remove those drums and related contaminated soil (*paint related wastes and solvents*)
- Additional assessment work done in 1999 and 2005
- Additional soil excavation done by EPA in 2012 (*removal of approximately 2,000 tons of soil with residual paint waste and solvents*)



Callahan Property Site Wildwood, Missouri			
TETRA TECH PROJECT NO. X9004.12.0316.000 Direction: Northeast	DESCRIPTION	This photograph shows the northern extent of the excavation on November 29, 2012.	23
	CLIENT	Environmental Protection Agency Region 7	Date
			11-29-12
TETRA TECH PROJECT NO. X9004.12.0316.000 Direction: South	DESCRIPTION	This photograph shows silt fencing and the sloped southern wall intended to control runoff from the excavation pit during a possible rain event.	24
	CLIENT	Environmental Protection Agency Region 7	Date
			11-30-12

Callahan Property Site Wildwood, Missouri			
TETRA TECH PROJECT NO. X9004.12.0316.000 Direction: Southeast	DESCRIPTION	This photograph shows the southern portion of the east wall, where sample CA-EW-01 was collected.	29
	CLIENT	Environmental Protection Agency Region 7	Date
			11-30-12
TETRA TECH PROJECT NO. X9004.12.0316.000 Direction: Southwest	DESCRIPTION	This photograph shows the northern portion of the west wall, where sample CA-WW-02 was collected.	30
	CLIENT	Environmental Protection Agency Region 7	Date
			12-03-12

Callahan Property Site
Wildwood, Missouri



TETRA TECH PROJECT NO. X9004.12.0316.000 Direction: Northwest	DESCRIPTION	This photograph shows the stockpile of overburden soil removed from the excavated area and believed to be free of contamination. Sample CA-OVRSTK-01 was collected from this soil.	27
	CLIENT	Environmental Protection Agency Region 7	Date 11-30-12



TETRA TECH PROJECT NO. X9004.12.0316.000 Direction: Southwest	DESCRIPTION	This photograph shows the west wall of the excavated pit. Sample CA-WW-01 was collected south of the southernmost white line on the wall.	28
	CLIENT	Environmental Protection Agency Region 7	Date 11-30-12

Callahan Property Site
Wildwood, Missouri



TETRA TECH PROJECT NO. X9004.12.0316.000 Direction: East	DESCRIPTION	This photograph was looking east along the north wall of the excavated pit from the northwest corner of the pit.	39
	CLIENT	Environmental Protection Agency Region 7	Date 12-05-12



TETRA TECH PROJECT NO. X9004.12.0316.000 Direction: West	DESCRIPTION	This photograph was looking west along the north wall of the excavated pit from the northeast corner of the pit.	40
	CLIENT	Environmental Protection Agency Region 7	Date 12-05-12

Callahan Property Site
Wildwood, Missouri



TETRA TECH PROJECT NO. X9004.12.0316.000	DESCRIPTION	This photograph shows the silt fence and rip rap installed by ERRS.	57
	CLIENT	Environmental Protection Agency Region 7	Date
Direction: South			12-13-12



TETRA TECH PROJECT NO. X9004.12.0316.000	DESCRIPTION	This photograph shows the silt fence and rip rap installed by ERRS.	58
	CLIENT	Environmental Protection Agency Region 7	Date
Direction: North			12-13-12

Callahan Property Site
Wildwood, Missouri



TETRA TECH PROJECT NO. X9004.12.0316.000	DESCRIPTION	This photograph shows ERRS hydroseeding a portion of the backfilled area.	59
	CLIENT	Environmental Protection Agency Region 7	Date
Direction: Southwest			12-14-12



TETRA TECH PROJECT NO. X9004.12.0316.000	DESCRIPTION	This photograph shows part of the hydroseeded area.	60
	CLIENT	Environmental Protection Agency Region 7	Date
Direction: West			12-14-12

Mrs. Callahan's Letter requesting property be deleted from NPL

Environment Protection Agency
Laura Price
11201 Renner Rd
Lenexa Ks 66219

I am requesting to delete my property
on Strecker Rd in Wildwood Mo 63011
from the National Priority List

Sincerely

Don Callahan



Legal Partial Deletion Process

40 CFR 300.425(e)

(e) *Deletion from the NPL.* Releases may be deleted from or recategorized on the NPL where no further response is appropriate.

(1) EPA shall consult with the state on proposed deletions from the NPL prior to developing the notice of intent to delete. In making a determination to delete a release from the NPL, EPA shall consider, in consultation with the state, whether any of the following criteria has been met:

(i) Responsible parties or other persons have implemented all appropriate response actions required;

(ii) All appropriate Fund-financed response under CERCLA has been implemented, and no further response action by responsible parties is appropriate; or

(iii) The remedial investigation has shown that the release poses no significant threat to public health or the environment and, therefore, taking of remedial measures is not appropriate.

(2) Releases shall not be deleted from the NPL until the state in which the release was located has concurred on the proposed deletion. EPA shall provide the state 30 working days for review of the deletion notice prior to its publication in the Federal Register.

(3) All releases deleted from the NPL are eligible for further Fund-financed remedial actions should future conditions warrant such action. Whenever there is a significant release from a site deleted from the NPL, the site shall be restored to the NPL without application of the HRS.

(4) To ensure public involvement during the proposal to delete a release from the NPL, EPA shall:

(i) Publish a notice of intent to delete in the Federal Register and solicit comment through a public comment period of a minimum of 30 calendar days;

(ii) In a major local newspaper of general circulation at or near the release that is proposed for deletion, publish a notice of availability or use one or more other mechanisms to give adequate notice to a community of the intent to delete;

(iii) Place copies of information supporting the proposed deletion in the information repository, described in § 300.430(c)(2)(iii), at or near the release proposed for deletion. These items shall be available for public inspection and copying; and

(iv) Respond to each significant comment and any significant new data submitted during the comment period and include this response document in the final deletion package.

(5) EPA shall place the final deletion package in the local information repository once the notice of final deletion has been published in the Federal Register.

[55 FR 8839, Mar. 8, 1990, as amended at 80 FR 17706, Apr. 2, 2015]

State of Missouri Concurrence with Appropriateness of Deletion



AUG 15 2014

Ms. Cecilia Tapia, Director
EPA, Region 7
11201 Renner Boulevard
Lenexa, KS 66219

Dear Ms. Tapia:

Cecilia

I am writing in response to your June 17, 2014, letter regarding partial deletion of the Callahan Property (OU03) from the Ellisville Superfund National Priorities List (NPL) site. The Superfund Section of the Missouri Department of Natural Resources' Hazardous Waste Program (HWP) has reviewed the U.S. Environmental Protection Agency Region 7's (EPA) Removal Action Reports referenced in your letter, and has assisted the EPA in field oversight of the removal actions. The HWP's Superfund Section has also reviewed the draft *Federal Register* Notice of Intent to Partially Delete the Callahan Property from the NPL, and provided comments to the EPA's Remedial Project manager. We have concluded, based on the available information, that the two removal actions conducted at the Callahan property have resolved all concerns resulting from the contamination that was placed on the property, and have achieved the remedial action objectives for OU03 Callahan. Therefore, the Department concurs with partial deletion of the Callahan property from the Ellisville Superfund Site, and understands that the other active OUs of the Ellisville Site will remain on the NPL.

The Department appreciates the EPA's efforts in returning the Callahan property to a condition which is suitable for any proposed future use without need of institutional controls. We also appreciate the opportunity to provide substantial state involvement in the removal actions at the Callahan property, and the opportunity to review and comment on the draft *Federal Register* notice and provide concurrence with partial deletion from the NPL. We believe this is a significant accomplishment for the EPA and the Department.

If you or your staff have any questions or concerns please contact Don Van Dyke with the Department's Hazardous Waste Program, P.O. Box 176, Jefferson City, MO 65102, by e-mail at don.van.dyke@dnr.mo.gov, or by telephone at (573) 522-3351.

Sincerely,

DEPARTMENT OF NATURAL RESOURCES

Sara Parker Pauley

Sara Parker Pauley
Director

SPP:dvj

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To learn more about the Missouri Department of Natural Resources visit dnr.mo.gov.*



Missouri Attorney General Affirmation



ATTORNEY GENERAL OF MISSOURI
JEFFERSON CITY
65102

CHRIS KOSTER
ATTORNEY GENERAL

TEL: 573-751-3300
FAX: 573-751-3302

August 14, 2014

Mayor Adam Q. Paul
City of Ellisville
1 Weis Avenue
Ellisville, MO 63011

RE: *Strecher Forest/Bliss Site - Ellisville, Missouri*

Dear Mayor Paul:

I am responding on behalf of the Attorney General Chris Koster to your letter dated July 3, 2014, in which you raise concerns regarding the Bliss site. Specifically, you ask for assistance in keeping the Bliss site on the National Priorities List (NPL) and having the Record of Decision (ROD) revised to require five-year reviews.

I have discussed this matter with Dennis Stinson at the Missouri Department of Natural Resources. Mr. Stinson is the Chief of the Superfund Section in the Hazardous Waste Program and has responsibility to Missouri's involvement in Superfund sites such as this. Mr. Stinson assured me that the Department is aware of your concerns and is giving these issues serious consideration.

My understanding is that the Bliss site is actually a subsite of the Ellisville Superfund Site. At present the only portion of the Ellisville Superfund Site that has been proposed for partial delisting is the Callahan subsite, which does not include the properties you discuss in your letter (see attached map). The former Rossie and Bliss Subsites will remain on the NPL. With regard to the Callahan Subsite, I was told that EPA did a second removal action on Callahan in late 2012 and, as a result, DNR believes that subsite is clean enough to allow for any use and therefore can be delisted.

www.ago.mo.gov



Strecher Forest/Bliss Site - Ellisville, Missouri
August 14, 2014
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In regards to five-year reviews, Mr. Stinson agrees that this issue warrants further review. He had not reached a conclusion as to whether he felt five-year reviews should be reinstated, but did indicate that he was bringing this matter up in discussions with U.S. EPA. I have urged him to pursue this matter and to reach out to you to provide an update on the progress of those discussions.

If you have any questions or wish to discuss this matter further, please feel free to contact me. You may also contact Mr. Stinson through DNR's main number, (573) 751-3443. He indicated that he would be willing to discuss this matter directly with you.

Sincerely yours,

CHRIS KOSTER
Attorney General

John K. McManus
Assistant Attorney General
573-751-1622

JKM

c: Dennis Stinson, MDNR/HWP Superfund Section

EPA “post-removal” Action Evaluation



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7

11201 Renner Boulevard
Lenexa, Kansas 66219



JUN 22 2015

MEMORANDUM

SUBJECT: Evaluation of Post-Removal and Historical Data Representative of Current Conditions
Callahan Property Subsite
Ellisville Superfund Site, Operable Unit 3
Wildwood, Missouri
CERCLIS ID: MOD980633010

FROM: Kelly Schumacher *Kelly Schumacher*
Toxicologist
ENST/EDAB

TO: Laura Price
Remedial Project Manager
SUPR/SPEB

Prior to delisting the Callahan Property Subsite (Operable Unit 3) of the Ellisville Superfund Site, located in Wildwood, Missouri, the U.S. Environmental Protection Agency's Office of Superfund Remediation and Technology Innovation requested that Region 7 conduct a limited human health risk assessment to document that No Further Response is necessary at this subsite. To satisfy this request, as documented in this memo, we determined that the current conditions of the site are adequately characterized and that all concentrations of dioxins and furans, metals, polychlorinated biphenyls, semi-volatile organic compounds, and volatile organic compounds remaining in surface and subsurface soil are below a level of concern for human health, based on the Agency's default residential exposure assumptions and current toxicity values as of June 2015. This evaluation shows that, following the EPA-funded removal activities conducted in late 2012, the Callahan Property no longer poses unacceptable human health risks for any type of current or future exposure scenario. The Callahan Property is now safe for unlimited use and unrestricted exposure. If you have any questions or need further assistance, please contact me at x7963.

Background

One of three subsites of the Ellisville Superfund Site, the Jean Ellen Callahan Property, is located southwest of the Bliss Property and south of the proposed Strecker Forest Subdivision, in Wildwood, Missouri. In the 1970's, while working for Mr. Russell Bliss, owner of the Bliss Oil Company, Mr. Grover Callahan used the property to dispose of drums containing hazardous waste. Following an eyewitness report about dumping activities on the property, the EPA and the Missouri Department of Natural Resources investigated the property in September 1980. From 1981 to 1982, the EPA conducted a removal action, removing 1,205 drums and contaminated soil from the site and returning approximately 500 cubic yards of excavated soil as backfill. As shown in the attached figure, the location of this fill area is in a small valley near the western property boundary, south of a pond and



Current Status and Next Steps

- In March 2016, EPA issued a notice of intent to delete the Callahan property of the Ellisville Superfund Site from the National Priorities List and requested public comment on the proposed action.
 - ▣ EPA is now reviewing public comments including the comments of the City of Wildwood (EPA received about 25 comments).
 - ▣ EPA has no specific timeline for a final decision on deleting the property.
 - ▣ EPA continues to engage with the City of Wildwood to get closure on remaining questions to achieve a successful return of the property for appropriate use.