

US EPA ARCHIVE DOCUMENT

CARTER CARBURETOR ROUNDTABLE NOTES

Tuesday, February 21, 2012

Herbert Hoover Boys and Girls Club

7:00 – 9:00 p.m.

Attendees: Residents, local organizations, state and federal government representatives, faith-based organizations, contractors, and the community at large.

Agenda:

- 7:00 – 7:10 p.m. Welcome and Introductions (Facilitator)
 - 7:10 – 7:15 p.m. Notes from Last Meeting and Process (Community Involvement Coordinator)
 - 7:15 – 7:20 p.m. Site Updates (Project Manager)
 - 7:20 – 7:30 p.m. Legal Negotiation Process (Attorney)
 - 7:30 – 7:50 p.m. How Contaminants Move Through the Environment (Technical Assistance)
 - 7:50 – 8:30 p.m. Roundtable Questions and Answers
- Adjournment

Roundtable Discussion

- The Roundtable began with roll call and introductions of all participants in attendance. There were approximately 35 – 40 people in attendance. Participants included, but were not limited to, nearby residents of the Carter Site, local environmental organizations, state health representatives, federal congressional staff, contractors, job training graduates, local community college representative and other interested stakeholders.
- Suggestions were taken for the date to hold the next roundtable. The decision among the group was to have the fourth Roundtable on Tuesday, April 3, 2012. Notes were provided from the January 10, 2012 Roundtable.
- Handouts on the history of the site, site timeline, time-critical removal and off-site sampling process were provided for the participants. Information on the Superfund process and questions and answers from the January roundtable were also provided as handouts to the participants.
- EPA gave an update on the status of the Carter Carburetor Site. The project manager informed the participants that the fence around the Carter Carburetor building had been breached. EPA had already taken steps to secure the fence and worked with the building owner to make sure the building was boarded up to protect human health. The project manager also confirmed that no one was living in the building.
- An EPA representative from the Office of Regional Counsel provided general information on the legal process and the various steps involved with negotiations at any Superfund site.

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- EPA explained that the legal process to address hazardous waste can vary site-to-site and is unique, which means that the processes specific to the Carter Site can vary from other Superfund sites. Information was also shared about the Superfund Statute and how it is set up, what determines a responsible party at a site; how EPA looks at owners, operators, current owners, past owner/operators and parties that have in some way contributed to contamination at a Superfund site.
- EPA also discussed factors in the legal process that impact negotiations and stated that negotiations can take a while. EPA attempts to set timeframes and boundaries, however, the process is dynamic and things can change. EPA believes that reaching an agreement with responsible parties is one of the most effective ways to conduct the negotiation process.
- A representative from the EPA Technical Assistance Program gave a presentation on “how contaminants move through the environment.” It was explained to participants that in order to have a health affect from. a chemical in the environment, you **must have had an exposure to that chemical by ingestion, inhalation, dermal or injection**
- Some participants were concerned that past distribution of packaged potato chips from the Carter building could have caused people to be contaminated. However, the technical representative explained that if the potato chips were always packaged while in the building, the food probably was not contaminated. She also stated that she could not speak to much of the operation without more information about the distribution process.
- Additional comment from EPA was that if anyone in the building was exposed to the PCBs, maybe workers distributing the potato chips, they could have been exposed by getting it on their hands, etc., just like the workers that worked in the Carter Carburetor plant. PCBs were used in the hydraulic fluids to run the die cast. This is the main reason contamination was there. That is why EPA conducted a time-critical removal in the die cast building.
- There were also some concerns about groundwater. A question was raised about the groundwater and if it had ever been characterized. EPA stated that the groundwater had not been characterized; however, there is no risk of exposure from the groundwater because no one is drinking the groundwater. EPA explained that you can also be exposed to groundwater by vapor intrusion and there can be a risk if vapors come up and work its way into the home.
- EPA conducted off-site sampling to determine if vapor was intruding into homes in May of 2011 and collected vapor samples. To date, indoor air sampling has shown no significant human health threats due to vapor intrusion from contaminated groundwater.

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- EPA will conduct another seasonal sampling. EPA is planning to conduct a third round of sampling in April. Sampling was conducted May 2011, September 2011, and February 2012.
- EPA explained that any contamination considered immediately harmful to human health or the environment was cleaned up under the Time Critical Removal conducted at the site from 1996 – 1998.
- The question was asked as to “whether the community had any input in this process.” The project manager explained that the community said they were worried about contamination in the neighborhood at one of the earlier meetings. EPA then conducted off-site sampling as a result of the community’s concern and request for sampling to be done. The community has requested many things during this process and EPA has responded to the best of its ability under the Superfund Authority.
- A comment was made as to whether the building was really secure. A concern about pigeon waste was discussed and whether the trafficking of pigeons in and out of the building is a concern and whether pigeons can transfer contamination from the building. “If the building is contaminated and animals or critters are going in and out of the building, can that be a problem?”
- EPA stated that the highest concentrations of PCB contamination in the CBI building were on the first floor; pigeons come in mainly on the fourth floor. The fourth floor had only minor amounts of contamination. The highest concentrations of PCBs were found on the first floor near where the Die Cast building used to connect to the CBI building. The contamination at the Carter Carburetor Site was due to large scale industrial processes and the use of PCBs and TCE. It is unlikely that animals would track enough contamination from the site to cause a significant human health concern.
- EPA decided the building should be demolished. This decision was based on information documented in the EE/CA and from public comment.
- A comment was made that the Herbert Hoover Boys and Girls Club has a garden on site. The State of Missouri is generally in favor of urban farming. There is a vacant lot that has been tested. Is the vacant lot included in the cleanup?
- During the May 2011 off-site sampling event, a sample collected from a vacant lot near the site detected PCBs at approximately 3.8 parts per million. However, this particular type of PCB compound was not associated with the Carter Carburetor Site. The Missouri Department of Health and Senior Services (MDHSS) suggested that the PCB levels detected might be above state acceptable levels for a residential property. Currently, this vacant lot is not considered part of the Carter Carburetor Site. The information gathered so far does not indicate that this vacant lot would qualify for a Superfund site. EPA believes any further

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characterization of this site should be done at a local or State government level and referred to EPA, if necessary.

- Potential locations for urban gardens should be pre-sampled to assure there is no pre-existing contamination in the soil.

Q: Is there a class action suit against Carter Carburetor and the workers being contaminated there?

A: EPA is unaware of the specifics of any law suit involving workers. EPA does not have jurisdiction over workers exposed to chemicals solely in the workplace.

Q: How do children get tested?

A: Participants were informed that the Health Department has a blood test for PCBs. The Missouri Department of Health representatives stated that the lead test is the only one they could give advice on for children.

Additional comments made: Any investigation involves looking at the site and what level of exposure exists. Prior to 1995, people may have been exposed, however, since 1995 there is probably not much exposure. Some contamination did go into the sewer system; however, it is difficult to determine whether people have been exposed. Most PCBs are in our food, but not at dangerous levels.

Another comment made from participants is that many people left Carter Carburetor and went out to Chrysler. The doctor would have told people when the problem was contracted which would determine if it came from Carter or Chrysler?

- Do you have any figures of the number of people that have had a health care problem from working in the Carter Carburetor building?
- **Q: Is it time to epoxy the old Die Cast area again?**

A: No. Regarding green stuff; when the Die Cast building was cleaned and sand blasted, a temporary cap was placed over it. An epoxy cover was sprayed over it. The green stuff is epoxy.

- **Q: Regarding vapor intrusion at the Lindell Bank. What did EPA do?**
Comment Regarding EPA sampling: EPA did not test within a two-block parameter like they should have. There are some people's homes that need to be tested.

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A: EPA chose a statistically representative number of properties to sample within a one block area from the site. This information is presented in the report for off-sampling conducted in May 2011. Based on the results of this sampling, there is no apparent reason to conduct additional samples further from the site. There is also no apparent reason to conduct sampling of additional homes.

○ **Q: What is the hold up on the clean up at the site?**

A: The site is in a negotiation phase. EPA and the Potentially Responsible Parties (PRPs) are attempting to reach an agreement to implement the proposed Removal Action as described in the Action Memorandum (Decision Document)

○ **Q: How many parties are involved with Carter?**

A: EPA assumes this question pertains only to Potentially Responsible Parties and not other stakeholder parties. The Potentially Responsible Parties at the site are ACF Industries and Carter Building Incorporated (CBI)

○ **Q: Where are the three sewers that were tested located?**

A: Sewer 1: At or near the intersection of Spring Avenue and St. Louis Avenue.
Sewer 2: At or near the intersection of Fall Avenue and St. Louis Avenue
Sewer 3: On Spring Avenue between Dodier Street and St. Louis Avenue
Attached is a site map showing the approximate location of these sediment samples.

○ **Q: Deciding the Remedy: If deciding on remedy and cost has been reached per the “Decision Document”, what phase is Carter Carburetor in now?**

A: The site is in a negotiation phase. EPA and the Potentially Responsible Parties (PRPs) are attempting to reach an agreement to implement the proposed Removal Action as described in the Action Memorandum (Decision Document)

○ **Q: Was the decision document a negotiating ploy?**

A: The decision document (Action Memorandum) is an important phase of the project. The decision was based on many factors including the Engineering Evaluation/Cost Analysis and comments from the community. This decision is supported by the Administrative Record. The Administrative Record is available to the public and can be viewed at any time during normal business hours at the Repositories (Divoll Branch Library and Herbert Hoover Boys and Girls Club). Once the decision was made, EPA could begin the negotiations for

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implementation. These negotiations are currently ongoing. Details of these negotiations are enforcement sensitive information and not releasable to the public.

- **Q: Chemical Commodities took “well over a year” – Carter has taken seven years. What gives?**

A: EPA assumes the question is asking for a comparison of the relative time frames of similar actions taken at these two sites. It is important to note that all sites are different and comparing two sites' time frames provides no conclusive information. There are numerous factors that affect the time frames at a site specifically unique to that particular site. EPA also assumes that the quote “well over a year” was a quote from EPA Attorney Barbara Peterson, when she used another Superfund site as an example and was talking about time frames for negotiations at the Chemical Commodities site.

Review of EPA's Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS) database and site file revealed the following:

- a. The Administrative Order on Consent for the Remedial Investigation/Feasibility Study (RI/FS) for the Chemical Commodities site was signed on May 10, 2000.
 - b. The Chemical Commodities site Record of Decision was signed on September 28, 2005
 - c. The Administrative Order on Consent for the Engineering Evaluation/Cost Analysis (EE/CA) for the Carter Carburetor site was signed on September 29, 2005.
 - d. The Carter Carburetor Action Memorandum was signed on March 30, 2011
 - e. Negotiations on the Chemical Commodities Site Consent Decree for the Remedial Design/Remedial Action began on April 2006 and concluded in May 2008
 - f. Negotiations on the Administrative Order on Consent/Settlement Agreement for implementation of the proposed removal action began on May 18, 2011 and are not yet concluded.
- **Q: Which of the Removal Action Goals” applies at the Die Cast part of the site?**

A: Based on current information, the removal action goals for PCBs should adequately address the Die Cast Area.