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EPA Environmental Roundtable with Mathy Stanislaus Assistant Administrator for the Office of Solid Waste and Emergency Response Monday, March 19, 2012, St. Louis University Busch Student Center 7:00 – 8:00 p.m.

EPA Assistant Administrator, Mathy Stanislaus hosted an Environmental Roundtable with St. Louis stakeholders on Monday March 19, 2012, at the St. Louis University Busch Student Center, 7:00 p.m. The Roundtable served as an opportunity for the Assistant Administrator to interact with business leaders, local and state organizations, residents and other interested parties regarding environmental concerns in St. Louis and the State of Missouri.

Invitees included local businesses and organizations, state and federal organizations, academia, health organizations, contractors, residents, faith-based organizations, local, state and federal elected officials, grassroots organizations, and the local community.

Several representatives from local and grassroots organizations in the St. Louis area participated in the Roundtable. There were very few residents that live on the north side of St. Louis in attendance. Other participants included state health representatives, other state organizations, federal congressional staff and EPA staff. The Post Dispatch Newspaper was also represented at the Roundtable.

Note: Most of the usual Carter Carburetor Roundtable participants were not present at the Environmental Roundtable with the Assistant Administrator.

There were several topics mentioned at the Roundtable; however, the highest concern related to the Carter Carburetor Superfund Site, located on the north side of St. Louis, at St. Louis Avenue and Grand.

Questions and Concerns Regarding Carter Carburetor

- Stakeholders stated that Carter Carburetor is a major Superfund site, and that there are numerous brownfields.
 - EPA has a grants program to help with cleanup, we need to bring in private investments along with public investments.
- M-SLICE sent copies of questions, issues and concerns regarding Carter Carburetor to Mathy Stanislaus at the EPA Washington Office.

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Q: Why is the Carter Carburetor Site not listed on the National Priorities List (NPL)?
 Major environmental hazards impact the community around Carter Carburetor.
 Request: Please look into rating Carter Carburetor on the NPL.

A: The Carter Carburetor Site is being addressed with Superfund Removal Authority which does not require listing on the National Priorities List (NPL).

When ranking Superfund sites for inclusion on the NPL, EPA uses the Hazard Ranking System (HRS) to score sites based on several contaminant exposure pathways: groundwater, air, surface water and soil. However, it is not always necessary to include sites on the NPL in order to address the threats associated with a specific site. In fact, it is quite costly and time consuming to prepare a site scoring package which can withstand legal scrutiny. The primary purpose for listing a site on the NPL is to compete for federal funds to address the worst sites first. At Carter Carburetor, Potentially Responsible Parties (PRPs) are expected to pay for cleanup. Therefore, little or no federal funding will be needed.

Superfund Sites can also be addressed by utilizing removal authority without listing them on the NPL. Carter Carburetor will be addressed in two phases using removal authority. The first phase was a Time-Critical Removal Action which occurred from about 1997 to 1998. This Time-Critical action was taken to address the immediate threat of direct exposure to the PCBs. The second phase of this action is to conduct a Non-Time-Critical Removal to address the remaining contamination, which is primarily within the remaining buildings and in the subsurface soils. The Non-Time-Critical Removal process does resemble the remedial process. Thus, there is no apparent benefit in placing the site on the NPL. If the PRPs failed to take the appropriate removal action,

- **Request:** We would like to invite Mathy back to St. Louis for a tour of the north side so he can see how our children live every day.
- **Comment:** The community has high emissions, high cases of asthma, with vacant buildings and blight.

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- **Comment:** There is a problem with the relationship between EPA and the community and how EPA delivers information to the community.
- Comment: EPA employees come into the community with frustration; believes the community has to pry information from EPA. Believes that when they tell EPA they are sick, EPA should not tell them what the data is saying and that there are no health concerns. Expressed that they need EPA to respect them and listen to what they are saying about their health issues.
- **Request:** The residents of the Carter Carburetor community would like to see a Brownfields Advisory Council for the City of St. Louis, Missouri.
- **Comment:** There was a 684-page document from EPA brought to the community that community had never seen before.
- Another participant stated that they had met with EPA and that EPA has done a lot of things at the Carter Carburetor Site. They believe, however, that EPA dropped the ball on communication about Carter Carburetor. The site is next to a community center and a block away from the school. It was also expressed that EPA Region 7 should have education seminars for our youth about hazardous waste issues before they built a fence around Carter Carburetor; having a leadership issue with EPA; flow of information to community is lacking. Not recognizing the hazardous waste issues concerning our children is a concern to our community. We feel the lack of sensitivity to our children from EPA.
- **Q:** Why is it taking so long to do something about Carter Carburetor? Our babies are being impacted by this every day. EPA comes back meeting after meeting with no follow up on previous meetings from the Carter Carburetor Roundtable discussions. There are no minutes being taken from previous meetings about the Carter Carburetor site. There is no action statement of what has happened from the previous meeting.

The Assistant Administrator stated that EPA's intentions are to move forward on the cleanup. EPA has a website, Carter Carburetor has been listed on there, summary of the minutes to be put on that site.

A: Minutes are being provided to the Carter Carburetor Roundtable participants and have been placed on the EPA Region 7 Carter Carburetor website.

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- Comment: We don't understand where EPA is coming from with Carter Carburetor, need transparency on the process, is the cleanup going to happen? Is Carter Carburetor going to continue to own that site? How do we plan an economic impact on this plan?
 - The Assistant Administrator stated that he could not discuss the legal process about Carter Carburetor because it is in the negotiation stage.

A: EPA reviewed and approved an Engineering Evaluation/Cost Analysis (EE/CA) to help decide the appropriate cleanup at the Carter Carburetor Site. EPA presented this document to the public for comment on September 27, 2010. After a lengthy comment period, EPA responded to public comments and signed a decision document detailing the appropriate course of action, based on the EE/CA and comments received from the public.

EPA is currently in negotiations with PRPs to implement the Removal Action as described in the Action Memorandum (decision document). Details of negotiations are enforcement sensitive and are not releasable to the public.

- **Comment:** Insitu Thermal Desorption (ISTD) has not been proven and Carter Carburetor is going to be a pilot test for this process. We understand that the Carter Carburetor site is going to be a pilot process for this because this process has never been used before. The message to the community should be consistent and clear.
- Answer: ISTD was originally developed for treating PCBs and has been successfully used at other sites, including residential sites. In March 2011, EPA organized a presentation for the community and showed pictures of what had been done at other sites and in residential neighborhoods. However, we need to conduct a pilot test to make sure ISTD works at the Carter Carburetor site under site specific conditions. This is a concern we heard from the community.

If the pilot test shows that this doesn't work or is significantly more costly at the Carter Carburetor site, then EPA will decide to excavate and haul the material off-site for disposal.