



REGION 7

LENEXA, KS 66219

ACTION MEMORANDUM

SUBJECT: Request for an Emergency Removal Action at the "North Jefferson Street Abandoned Containers" Pursuant to the On-Scene Coordinator's delegated authority under CERCLA Section 104

FROM: John "Joe" Krauska, On-Scene Coordinator
Response, Removal and Emergency Preparedness Section

THRU: Heath Smith, Manager
Response, Removal and Emergency Preparedness Section

TO: Adam Ruiz, Manager
Assessment, Emergency Response and Removal Branch

I. PURPOSE

The purpose of this Action Memorandum is to document the decision to initiate response actions described herein for the North Jefferson Street Abandoned Containers site, pursuant to the On-Scene Coordinator's delegated authority under Section 104 of the Comprehensive Environmental Response, Compensation and Liability Act. Several abandoned containers containing an unknown liquid were discovered on a street corner in a residential area of the city of St. Louis.

Due to the volatile nature of the contents reported by the St. Louis City Fire Department (STLFD), the containers were relocated from the sidewalk to a fire station parking lot for safety reasons. Further field screening conducted by the STLFD Hazmat Team Engine House 28 identified CERCLA hazardous substances. A request for federal action (RFA) was submitted by the Missouri Department of Natural Resources (MoDNR) to the EPA Region 7 Removal Branch on July 17, 2024, to conduct a removal action. See attached memorandums.

II. SITE INFORMATION

A. Site Description

Site Name: North Jefferson Street Abandoned Containers

Superfund Site ID (SSID): B7Q7
NRC Case Number: N/A
EPA ID: MON000741137
Site Location: intersection of Thomas Street and Jefferson Avenue
Potentially Responsible Party (PRP): unknown
NPL Status: No
Removal Category: Emergency
Nationally Significant: No

B. Site Background

1. Removal Site Evaluation

On July 11, 2024, the STLFD Hazmat Team conducted field screening of the contents in the ten 5-gallon containers while two EPA OSCs and three MoDNR State OSCs observed. Field screening with a portable Smiths *HazMatID Elite* analyzer identified CERCLA hazardous substances in the containers: including toluenes, xylenes and sodium cyanide. Additionally, high levels of VOCs were recorded in the head space of the containers with a *Multi-RAE Pro* photoionization detector indicated hazardous conditions produced by the contents. Furthermore, the containers and their lids were in dubious condition allowing exposure to environment factors. Based on the hazardous nature of the contents and the unreliable integrity of the containers in a residential area, an emergency response removal action was initiated by the Removal Program to provide stabilization, transportation and disposal.

2. Physical location and Site characteristics

The North Jefferson Street Abandoned Container site is in the City of St. Louis, Missouri. The area surrounding the site is a mixture of residential, commercial and industrial property. The following address and GPS coordinates list the STLFD fire station where the containers were located at the time of the RFA:

- 1421 North Jefferson Street, St. Louis, MO 63106
- 38.643862, -90.212770

3. Release or threatened release into the environment of a hazardous substance or pollutant or contaminant

Based on field screening by the STLFD Hazmat Team, toluene, xylene, sodium cyanide and various other compounds were detected in the liquid contents of the abandoned containers. Toluene, xylene and sodium cyanide are hazardous substances as defined by section

101(14) of CERCLA and each are designated as “hazardous substances” in 40 C.F.R. § 302.4.

III. THREATS TO PUBLIC HEALTH, WELFARE OR THE ENVIRONMENT

A. Nature of Actual or Threatened Release of Hazardous Substances or Pollutants or Contaminants

The contaminants of concern (toluene, xylene and sodium cyanide) stored in containers of unreliable integrity in a residential area represent a threatened release of CERCLA hazardous substances.

B. Check Applicable Factors (from 40 C.F.R. § 300.415) Which Were Considered in Determining the Appropriateness of a Removal Action:

- ☒ *Actual or potential exposure to nearby human populations, animals or the food chain from hazardous substances or pollutants or contaminants [300.415(b)(2)(i)].
- ☐ Actual or potential contamination of drinking water supplies or sensitive ecosystems [300.415(b)(2)(ii)].
- ☒ *Hazardous substances or pollutants or contaminants in drums, barrels, tanks or other bulk storage containers that pose a threat of release [300.415(b)(2)(iii)].
- ☐ High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface that may migrate [300.415(b)(2)(iv)].
- ☐ Weather conditions that may cause hazardous substances or pollutants to migrate or to be released [300.415(b)(2)(v)].
- ☐ Threat of fire or explosion [300.415(b)(2)(vi)].
- ☒ The availability of other appropriate federal or state response mechanisms to respond to the release [300.415(b)(2)(vii)].
- ☐ Other situations or factors that may pose threats to the public health or welfare of the United States or the environment [300.415(b)(2)(viii)].

IV. SELECTED REMOVAL ACTION AND ESTIMATED COSTS

A. Situation and Removal Activities to Date

1. Current situation

The STLFD relocated each container to a fire station parking lot for safety reasons. This is where they were stored at the time the RFA was submitted to the EPA Removal Program. The fire department was notified of the RFA and reminded of the hazardous nature of the liquids. Future activities will be communicated with them prior to access.

2. Removal activities to date:

a. State/Local

The Missouri Department of Natural Resources has and continues to cooperate with EPA investigations. The STLFD hazmat team is not currently involved.

b. Federal Government/Private Party

The EPA Removal Program has initiated removal actions in response to the RFA to stabilize the containers. Pathways for transportation and disposal are being identified.

3. Enforcement

The party or parties responsible are unknown currently. The hand-written markings "Mason Tools", "Plumbing", and "Electricity" were observed on three of the ten containers. No labels or stamps were observed on the containers.

B. Planned Removal Actions

1. Proposed action description

The Removal Action will include stabilization, transportation and disposal of the containers and their contents.

2. Contribution to remedial performance

No additional resulting long-term remedial action at the site is anticipated.

3. Applicable or relevant and appropriate requirements (ARARs)

Removal Actions conducted under CERCLA are required to attain ARARs to the extent practicable. Any identified potential ARARs will be evaluated and complied with to the extent practicable. In determining whether compliance with ARARs is practicable, the OSC will consider appropriate factors, including the urgency of the situation and the scope of the removal action to be conducted. Specific ARARs for this site are detailed in the following table.

Action	Requirement	Citation
Hazardous materials transportation	Identification of requirements for transporting potential hazardous materials	40 CFR parts 171-179
Standards applicable to generators of hazardous waste	Manifesting, pre-transport, recordkeeping	40 CFR part 262
Standards applicable to transporters of hazardous waste	Manifesting, recordkeeping	40 CFR part 263
Occupational Health and Safety Act Standards	Worker protection	29 CFR part 1910
Hazardous Materials Transportation Act	Transportation	49 U.S.C. §§ 801 – 1813, 49 CFR parts 171 – 179

4. Project schedule

The response will be initiated on July 18, 2024 pursuant to the On-Scene Coordinators delegated authority, and will be complete upon notification of hazardous substance and container disposal in approximately 2 weeks.

C. Estimated Costs*

Contractor Costs (ERRS/START staff, travel, equipment)	\$14,000.00
Other Extramural Costs (Strike Team, other Federal Agencies)	\$0.00
Contingency Costs (20% of subtotal)	\$2,800
Total Removal Project Ceiling	\$16,800

*** The EPA direct and indirect costs, although cost recoverable, do not count toward the removal ceiling for this removal action. Liable parties may be held financially responsible for costs incurred by the EPA as set forth in Section 107 or CERCLA.**

V. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

A delay in action or no action at this site would increase the actual or potential threats to the public health and/or the environment.

VI. OUTSTANDING POLICY ISSUES

None.

VII. APPROVALS

This decision document represents the selected Removal Action for this site, developed in accordance with CERCLA as amended, and not inconsistent with the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). This decision is based on the administrative record for the site.

Conditions at the site meet the NCP section 300.415(b) criteria for a removal action and through this document, I am approving the proposed removal actions. The total project ceiling is \$16,800. This amount will be funded from the regional removal allowance or other appropriate regional procurement mechanism.

John "Joe" Krauska Jr.
Federal On-Scene Coordinator

ENDANGERMENT DETERMINATION UNDER CERCLA SECTION 106: HAZARDOUS SUBSTANCES

Pursuant to Section 106 of CERCLA, I have determined that there may be imminent and substantial endangerment to the public health or welfare or the environment because of an actual or threatened release of a hazardous substance from the site.

Adam Ruiz, Manager
Assessment, Emergency Response and Removal Branch

**Field Screening of Ten 5-Gallon Abandoned Containers
Conducted by St. Louis City Fire Dept. on 7/11/2024**

bucket	bucket color	pH*	VOC (ppm)**	VOC (ppb)**	HazMat ID results***	bucket markings****
01	yellow	5	0.49	490	toluene;xylene;dodecane;33dichlorbenzidine	"Mason Tools"
02	yellow	5	0.34	340	toluene;diisocyanate;butylcyclohexane;butyronitrile	markings "Plumbing"
03	black	4	0.4	400	xylenes;dodecane;diethylamine HCL;butylronitrile	
04	black	5	20	20000	xylene;dodecane;trimethylbutane	
05	yellow	5	35.4	35400	sodium cyanide;1-octanethio;33-dichlorobenzidine;dihydrochloric;6-bromonicotinic acid	"Electric"
06	black	5	5	5000	xylene;dodecane;2-ethyl-4-methylimidazole;4-iodopyrazole	
07	red	4	1.1	1100	xylene;dodecane;dipropylamine-hydrochloride	
08	red	5	19.2	19200	xylene;butylcyclohexane	
09	yellow	5	2.9	2900	444 ditrichoro-2,3;dimethylbutyramine;copper II acetate;cyanuric acid	
10	black	6	55	55000	sodium cyanide;1-decanethiol;benzidine di HCL; 5-Nitrobarbituric acid	

Readings taken by St. Louis City Fire Department, Engine House 28, Hazmat Team Unit 1

*pH taken with pH strips.

**VOC readings taken with a *Multi-RAE Pro* photoionization detector.

***Samples measured with a *Smiths HazMatID Elite*.

*****Markings were present upon discovery, hand-written with a marker.*