On Scene Coordinator	Sherry Kamke	(312) 353-5202
U.S. EPA attorney	Tom Mintz	(312) 886-6600
U.S. EPA enforcement	Dave Favero	(312) 886-4749
Jeff Larson	IEPA/Springfield	(217) 782-6760
Ken Mensing	IEPA/Collinsville	(618) 345-4606
Mike Miller	E+E	
Bill Good	IEPA's contractor	(312) 663-9415
Dan Sewall		
Jeff Binkley	TAT	(312) 993-1067

Property of:
Sherry A. Kamke OSC
U.S. EPA Region V
230 S. Dearborn 5HR11
Chicago, IL 60604

154078

4/1/87

Dead Creek Area G SiteID 8E Sauget, IL

Case was assigned to OSC on March 30, 1987.
Information given to me at that time:

by Mike Strimbu:
State is doing pre-remedial work
+ hopes to submit 16 sites in the city for NPL
Site has PCB's up to 74,000 ppm (7.4%)
octadichlorodibenzodioxin 130 mg/kg
pentachlorophenol (PCP) 1,400 ppm (0.14%)

Ability to document air release will be critical to HRS scoring. So we must coordinate action with IEPA and its contractor, E+E Ecology+Environment.

Contacts: Ken Mensing: IEPA - Springfield
Mike Miller, Bill Good: E+E (312) 663-9415

TDD to TAT for SA ASAP
- fence site
- cover to prevent release to air, coord w IEPA

I recieved documents from
IEPA to USEPA dated 2/23/87
E+E to IEPA dated 1/23/87

4/1/87

Conversation with Mike Strimbu gave this information:
the site is 4.5 - 6 acres 2 week job
an industrial area Monsanto is a potential RP
state did sampling

Conservation with Nick Longo gave this information
Property owners Harold Weise
Meryl Hankins
Emile Hankins
State contact Jeff Larson (217) 782-6760
Queenie Avenue bounds site
open area next to road Don Sena
residents 1/2 mile away

Conversation with Vernita Simon gave this information
she did a similar site she said you should
have the attorney
give owners the opportunity to do the work themselves
& make an agreement for access to the property
tell them you will give them keys
telling them there is hazardous materials
on their property

4/1/87

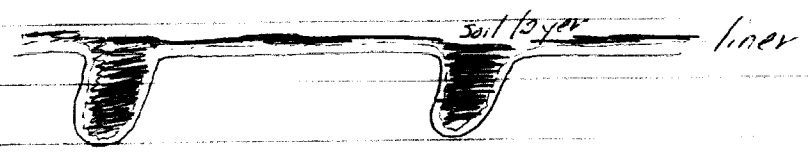
Conversation with Jeff Larson IEPA
Mr. Larson told me property owners are:

	Tax Parcel
1) Cerro Corp P.O. Box 681 E. St. Louis	1-26-400-14
2) James + Shirley Cronin	1-26-401-1
3) Andrew Hawkins	1-26-401-10
4) Emile Hawkins ✓	1-26-401-6 ✓
5) Meryl Hawkins ✓	1-26-401-11 ✓
6) Indus Gases Incorp.	1-35-101-6
7) Mid America Bank + Trust	1-26-401-2
8) Mineweld Inc.	1-35-101-3
	1-35-101-2
	1-35-101-7
9) Moto Gas Inc	1-26-401-7
	1-26-401-8
	1-26-401-9
10) Bill + Barbara Pennock	1-35-101-4
11) Village of Sauget	1-26-400-15
12) Harold Wiese ✓	1-26-401-3 ✓
	1-26-401-4
13) Wise Plating + Engineering	1-26-401-13

Jeff asked me to contact the state prior
to going down there so they can set up
community relations. He told me no drums
were on the perimeter. He told me to
talk to Mike Miller E+E, about
area of soil contamination. Air monitoring begins
next Fri May 30
evaluate

4/1/87

Conversation with Bob Bowden
He said to develop cost estimate myself for fencing and for cap.
The cap was described by Bob to be like



The area to be capped should only be the heavily contaminated area

Conversation with Len Zintak
about fencing cost estimate

9 gauge poles on top $11.50 / linear foot
cost extra for
20 ft gate
+ walk through gate
+ corner posts, gate posts

I estimated 2,000 feet of fence

Also need to cost
site survey to determine site boundaries so you are sure fence is placed on the right property

4/1/87

Survey should probably occur the week before the fencing
We should try to get a fixed price contract if possible

Fencing should be fixed contract
3 bids through Maycor

They will need height linear feet barbed wire or not, gauge, gates + corner post information

4/2/87

OSC went to Ecology + Environment to talk to Mike Miller. My intention was to recieve data on soil contamination so it can be determened how much it would cost for plastic ~~cap~~ cover. I recieved copies of data and grided maps of soil contamination. Mike said a cap will do no good because soil contamination is heavy. He was concerned with the cap interfering with air sampling or ~~the~~ HRS for the NPL. I told him I didn't think we would cap until the site was scored.

4/2/87

OSC talked to Sally Matz about the status of the EAP + SA for Area G. She said both TATs are in the field and couldn't work on reports. She said she would get someone to work on the cost data and she would let me know the figures.

OSC talked to Nick Longo about Area G. He told me he had a stack of data in his credenza. He told me enforcement is contacting 13 owners and seeing if they would be willing to do work and if enough evidence is there they will go after Monsanto. If some RP ~~takes~~ agrees to do work I will not have to oversee I will just check in. Nick also didn't believe drums were on the perimeter. So contractor should be in level D. He believed we should cap the whole thing. He believed the maximum extent of contamination extended out 40 ft south of the depression.

4/6/87

Talked to Dave Favero (enforcement) about PRP decision at Area G. He said right now we will give the PRPs/owners the option to do fence job but an order may be involved with the cap. We should contact the owners and get them to agree on access (access agreement). Attorney typically does this. And secondly, we should notify by phone PRPs/owners and ask them to do work or give them the option of doing the work.

Monsanto is a PRP we may not have enough legal evidence now but we are thinking of them.

We can have a written document that tells owners/PRPs of your intentions and also gives them the opportunity to do the cleanup.

4/7/87

Spoke with TAT Jeff Binkley. He said he completed the cost estimate for the action memo and it will arive today. Also, spoke with Attorney Tom Mintz. We discussed access agreements to the PRPs. We deided we would try to figure out who owned the land we were going to fence. Since it appears the state gave us property owners outside this area.

4/8/87

Action memo draft is typed with corrected cost data from TAT.

Talked to Jeff Larson of IEPA. I asked him if the state was beginning starting a removal on Area 6 because this was a concern of TAT Jeff Binkley. He said state actions were limited by RI/FS ~~workin~~ work that included air monitoring scheduled tentatively for end of May. He said after that they hoped it would score high enough for NPL and then it would possibly be a PRP cleanup.
I told Jeff our plans of fencing within next couple of weeks and then after the monitoring we would cap while remedial work was pending. He said it sounded like a good game plan.

4/8/87
Talked to Nick Lorego about property owners. He said the 3 names he got were mentioned by E+E's Dan Sewall. He said it is easy to get the information if you go to St. Clair County Building + get the right department. He also said Dave Favero could set up a search for property owners

4/8/87

by using Enforcement Support services

Tried to tell Tom Mintz but he wasn't there.

663-9415
Called E+E's Dan Sewall. He said on the phone that he believed that the owners were 4 and they are:
- Emile Hankins
- Mrytyl Hankins
- Harold Wiese
- Cerro Copper

I told him I had a list of 13 property owners but Nick had told me that you (Dan Sewall) said there were only 3 owners. I asked for an explanation. I told him some of the names out of the list of 13. He said he believed the state had sent me a list of all property owners between Queeny + Judith (N.S) and Mississippi and dead creek.

Work on contacting RPs began. 4/9/87 4/10/87

4/13/87- RPs contacted
4/15/87 Meeting was set up for Friday 4/24/87 at 10:30 A.M. in 12th Floor conference room

4/20/87 Tom Mintz was working on information gathering for meeting on Friday. He requested a better definition of the southern boundary.

4/20/87 OSC contacted Don Sewall at E+E (State's contractor). I asked him about the southern boundary of contamination. I asked him to use the grided map as a reference. He said low concentrations of DDE where found throughout the #1 grid around G through J. He also said he would fence that area in addition to the area that is marked as contaminated on the grided map. He said that the area to be fenced is clear cut. It is between cultivated field and the site.

10:00 AM 4/27/87

OSC Kamke, Attorney Mintz, and Enforcement Favero met to discuss the RP meeting that occured on 4/24/87 Friday. Monsanto called on Friday to say they will do work they will work with Cerro Copper + Wiese Eng. The latter two will help Monsanto with the costs. EPA will deal with Mosanto's Warren Small or Bill Defer, they are head of environmental affairs at Monsanto # 618/271-5835.
3 documents are needed as a formality.
1) access agreement
2) information requests
3) consent order
Tom Mintz is awaiting access agreements from IEPA Jeff Larson. This is because Cerro + Weise were hard to get access from. We also decided we would formalize the access agreement thru EPA because of the possibility of future actions at the site that we would need access for. Information requests are in typing. Consent order will be tricky. Access agreements will be read over the phone + followed up in writing + brought down by me.
Monsanto does not want to pay for any response/oversight costs now. Future action anticipated.

4/27/87
Jeff Larson would like to go when job begins if he can. I will get back to him.

~~Got numbe~~

4/27/87 8:00am
talked with Mike Strimbu he said set up a meeting with Tom + Dave. He said access agreements are Monsanto's problem. see last page.

4/27/87 12:30pm
Bob Bowden talked to me about Deak Creek job. He believed that the cap job should be part of the agreement with Monsanto. He didn't want to much of a lag period between the ~~sam~~ end of sampling + the cover job.

I talked to Dave Favero. He said if we put cap phase in it ~~wouldn't work~~ the consent agreement, they wouldn't agree because we have been telling them fence the site and if needed in the future (based on air data) cap the site.

Dave said instead we can leave the fence only in the agreement, wait for the go ahead for the cap + then order (unilateral) the RP to do ~~soil sampling etc + do cap~~ investigation and a remedial action.

4/27/87
I talked to Dan Sewall of E+E. I asked about the red flags on the site. He said they correspond to grid lines on the map. I also asked if he took samples from a little hill on the west side where some drums were sitting. He said yes + that he recommends fencing all the way to the parking lot. I also asked about the pipeline along the eastern fence. He said we could contact the gas line company with 1 days notice + they will locate the pipe. He asked about having access to site ~~after~~ it is fenced. I told him I would make sure they would have a key.

4/29/87

OSC conducted a site visit with Monsanto at about 11:30AM. Upon arrival at Monsanto's Krummrich Plant in Sauget I met Warren Small, Superintendent of Environmental Affairs and Paul Haechrel Senior Engineer on the Dead Creek project. We discussed several things. One was the area to be fenced we got out topos and tried to determine if we had considered all the property owners. Monsanto has a better plat map so they gave me a copy. We decided that there are 5 pieces of land to consider lots -014, -015, -003, + -004 and -011. These pieces of property belong to Cerro Copper (-014, -015) Wiese Engineering (-003, -004) and the trustee for the dead Hankin (-011). We discussed fence specifications for the site. I said I only had the specifications stated in the ~~not~~ letter sent to property owners. Warren didn't have a copy but Paul did - We reviewed these and added 7 keys to identical locks, put on 1 truck gate + 3 walk through gates.

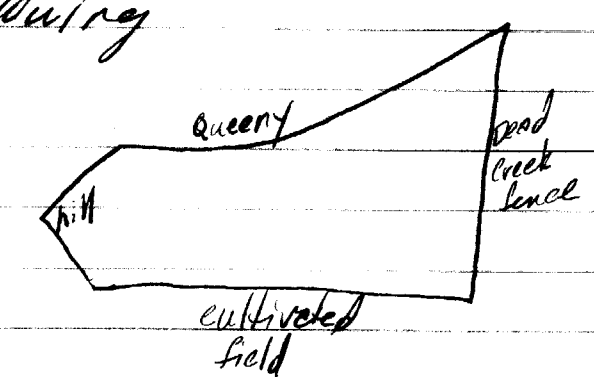
We also discussed health + safety plans for the site. Monsanto made me a copy of the plan for the work. I agreed that it ~~would~~ was adequate. I added that I did not want the east access road used (the path along dead creek) because it was to close to the gridded area. I proposed instead using the west side to access the southern boundary of the site.

Further on fencing specs Monsanto asked me about specs for fence posts. I said I wanted all corner posts cemented and every other fence post cemented. They wanted to hydraulically drive the posts instead. They said if that was not adequate they would cement the posts in. I agreed because I would be onsite while ~~to~~ on the job. ~~We~~

We discussed legal paper work. I told Warren I did not have the consent order with me because it had to be thru the signoff. I told him it would only state that Monsanto had agreed to put up a fence + that everyone retains their rights.

We discussed the origin of the name for Dead Creek. The dead dog was not involved. Warren said that the Indians (Cahokia) named it that long ago.
We discussed the time table for the work. He said he was getting pressure from his bosses to put it up immediately. He wanted to clear brush and put posts in on Wed, Thurs and Friday. I told him I had to supervise their actions to ensure that they met the specs needed for the job and also that I had made arrangements to go home. We decided that if we could stake out what was to be fenced that they could clear brush without me there. They would call me when they were going to put posts in + then we could decide if I would come out for that on Friday. My feeling is that I don't have to be out because they will not begin erecting the fence until Monday at which time I could have the post position altered anyway.

Paul and I took a site walk around 12:00 noon. We staked out the northern boundary, western boundary and the southern boundary. The northern boundary was about 8 feet from the road in all places. The southern boundary was the definite line between the cultivated field and the site and the western boundary ~~had~~ was not a straight line because I wanted to include a hill that had some suspicion material on it but was not part of the EHE grid. The boundaries look somewhat like the following



I discussed the approximate location of gates with Paul but definite locations were to be determined by me later while on site. I told him so that he could ~~refe~~ pass that information on to his contractor.
They were considering 2 contractors ~~and~~ bid the contractor who fenced in Dead Creek.

Paul said after talking with the contractors he believed the work would be finished after 10 working days ~~assum~~ assuming 8hr days.

5/14/87
Visited Dead Creek. I arrived as the fencing contractor was completing the job. I was given 8 keys to the locks that were identical locks. Keys could fit any of the 4 locks. I took pictures of the site and did a visual inspection from the perimeter to check the fencing. Everything was satisfactory.
I later distributed 1 key to each of the following:
1) Cerro Copper Products
2) Wiese Planning and Engineering
3) the Hankin Family

Keys will be given also to the following
1) Jeff Larson IEPA
2) Don Sewell FTE
3) Sherry Kemke EPA
4) Emergency Response Section EPA

I explained to the property owners that the fenced area was hazardous but that we were obligated to give them a key.

5/15/87
I talked to Paul Hoechst of Monsanto I told him that we should have some keep out signs on the fence. We decided they should go by the gates.

5/15/87
I talked with Bob Bowden about site work. I told him the fence was done & that I inspected it yesterday. He wanted to know about the cap. I told him that we had to wait until IEPA had done their air monitoring. He asked if the cap was part of the order was it included in the fencing order. I told him no. When we approached the RPs we told them we needed a fence & that a cap would be evaluated based on status data. Under these

terms they agreed to do the fencing. Bob said he wish it was included in the original agreement because it must be done, knowing that PCB concentrations are in the % range. I said Monsanto would not have agreed to do the capping or the fence if the original agreement also included the capping.
We discussed just excavating the hot areas. He was under the impression that the site was filled with capacitors + only at the surface. I told him that there were oily pits. I showed him where on the map. He asked if samples were taken from the pits. He questioned the % range concentrations based on the map I showed him because it had areas marked that were over .1% PCB + the pits were not marked.

5/15/87 I tried to talk to Don Sewall of E+E. I left a message.

5/15/87 I talked to Jeff Larson IEPA. I told him the fencing was complete and that I would send him a key. He confirmed the % PCB range. He also said that the well monitoring was showing contamination 40 feet down. I asked him when air sampling would be done. He said he was reviewing QAP and deadline was May 27 for that. If approved it would take 2 days to demobe and 1st week of June they would start. He said cap should go up to reduce volatilization until remedial work could begin. Under no circumstances would he recommend excavating hot areas. First of all you couldn't excavate all hot areas. It wouldn't do any good to remove just surface contamination. Second, we need to know what to do with it.

5/19/87
I called Paul Haechrel of Monsanto and asked him to put signs up on the fence. I asked for "Keep out hazardous material" signs but Paul said they could only get "No trespassing" signs I said to put one such sign up on every side of the fence near the gate.

He called me back later and received 8x10 signs with 2½" red letters on a black background saying "No trespassing". I told him I would like him to put up some EPA signs. The ones that say Keep out hazardous materials and he said if I would send the signs he would see to it that they were put up

6/8/87
Paul Haechrel from Monsanto called to let me know that he had hung the EPA Danger Industrial Chemicals signs at Area 6.

6/26/87
I called Jeff Larson of IEPA to find out the status of the air sampling. He had just spoke to E+E's Mike Miller. He said E+E was missing a part for their manifold. They would be going out to Sauget on Monday + starting the sampling on Tuesday. Jeff was disappointed and I voice my concerns about the delays taking us into the heat of the summer (more volatilization) QAP was approved on 28th. E+E was supposed to be at Sauget on May 30th We are back 1 month. I asked for all available data: all that is available is soil grid data and GW data is coming.
E+E is worried about humidity not heat

7/10/87

I called Jeff Larson of IEPA to check on the status of the air sampling. He said he would check and call back or have Dan Sewall of E&E call me.

Dan called. He said they were going back next week. They were ready to go last week. Equipment was ready but the humidity was too high.

I asked Dan for info of the sampling instrumentation. He said they designed a program to try to get all contaminants (all of the chemicals on the hazardous substance list). They have a high vol sampler filter sample reservoir and a low vol personal sampling pump. Fluorsil is the sorbent. He asked what we will be doing. I don't know. He added if we were excavating we would need air sampling

I asked him to let me know when the sampling was initiated and also to copy the sampling plan (for my own intellect). He would do this at his leisure.