UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7
11201 Renner Boulevard
Lenexa, Kansas 66219

MEMORANDUM

SUBJECT: Final Remedy Decision
QAS/Industrial Services Corporation
EPA ID # MOD073027609

FROM: Mary Grisolano
RCRA Oversight, Authorization, Grants & PCB Branch
Land, Chemical & Redevelopment Division

MARY GRISOLANO Digitally signed by MARY GRISOLANO Date: 2022.02.22 11:46:26 -06'00'

THRU: Leslye Werner, Section Chief
RCRA Direct Implementation Section
RCRA Oversight, Authorization, Grants & PCB Branch
Land, Chemical & Redevelopment Division

LESLYE WERNER Digitally signed by LESLYE WERNER Date: 2022.02.22 11:51:44 -06'00'

TO: DeAndré Singletary, Director
Land, Chemical & Redevelopment Division

Attached for your signature is the Final Remedy Decision (FRD) document for QAS/Industrial Services Corporation facility located at 1633/1635 Marsh Avenue in Blue Summit, Missouri (EPA ID # MOD073027609). The EPA, in consultation with the Missouri Department of Natural Resources (Department), has selected the below actions as the final remedy for the site:

- Finalize project post-closure documents and all attachments to approval by the Department;
- Maintain the previously capped area;
- Impose land use controls to limit exposure to contamination;
- Conduct groundwater monitoring to meet established standards; and
- Maintain a cost estimate of the work to be performed and provide financial assurance to cover the cost estimate.

The final remedy is detailed in the attached FRD that establishes timelines for required submittals. The FRD establishes that QAS may request termination of the Order from the EPA after land use controls and a financial assurance mechanism are in place as specified in the FRD. The Department may request that the EPA provide comments on the Quality Assurance Sampling and Analysis Plan. Other than these actions, the implementation of the final remedy transfers at this time to Department oversight and authority.

A thirty-day public comment period was held from December 14, 2021, to January 17, 2022, and a public notice announcing the availability of the proposed decision was published in the Independence Examiner on December 14, 2021. The Administrative Record was made available at the EPA Region 7 Records Center, in Lenexa, Kansas; the Missouri Department of Natural Resources in Jefferson City, Missouri; and the North East Public Library, located at 6000 Wilson Avenue in Kansas City, Missouri.

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No comments or request for public meeting were received during the public comment period; therefore, no response or meeting is required. The EPA's decision has not been changed from that originally proposed and placed on public notice. This FRD has been reviewed by ROAG, counsel, and the Department.

Your signature is required on the final remedy. If you have any questions, please contact me at x7657.

Attachment

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7
11201 Renner Boulevard
Lenexa, Kansas 66219

FINAL REMEDY DECISION

Quality Analytical Services, Incorporated

EPA ID No. MOD073027609
Blue Summit, Missouri

Primary Site Contaminants: Chlorinated/Petroleum Hydrocarbons, 1.4-Dioxane, Arsenic, Manganese, Nickel, Vanadium in Groundwater

Final Remedy: Groundwater Monitoring, Land Use Controls, Engineering Cover

INTRODUCTION

This Final Remedy Decision (FRD) is issued by the U.S. Environmental Protection Agency (EPA), in consultation with the Missouri Department of Natural Resources (Department), and describes the final remedy selected to address contaminated environmental media at the Quality Analytical Services, Inc. Facility (Facility), located at or near 1633/1635 Marsh Avenue in Blue Summit, Missouri. The Facility is southeast of Highway I-435 and Truman Road in western Jackson County. A General Facility Location Map is attached as **Figure 1**.

The EPA is issuing this FRD as part of its public participation responsibilities under the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. §§ 6901-6992k. The final remedy was proposed to the public in a Statement of Basis that was placed on public notice (i.e., made available and public comment requested) from December 14, 2021, to January 17, 2022. No comments were received during the public comment period.

The Facility is a former interim status RCRA hazardous waste treatment, storage, and disposal facility that collected and processed waste oil from 1958 through 1996. Buildings, tanks, and other equipment were removed from the property. The majority of soil contamination was removed from the Facility. Contamination remaining in soil is covered with a geosynthetic cap. Groundwater on and off the site has been impacted by site contaminants.

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SELECTED REMEDY

The EPA, in consultation with the Department, selects the actions described below as the final remedy for the Facility:

- Finalize project documents and all attachments to approval by the Department;
- Maintain the previously capped area;
- Impose land use controls to limit exposure to contamination;
- Conduct groundwater monitoring to meet established standards; and
- Maintain a cost estimate of the work to be performed and provide financial assurance to cover the cost estimate.

PUBLIC PARTICIPATION ACTIVITIES

From December 14, 2021, to January 17, 2022, the EPA Region 7, in consultation with the Department, made available to the public for comment a Statement of Basis that described the proposed remedy for the Facility. This public notice was conducted as part of the EPA's public participation responsibilities under the RCRA, and pursuant to an Administrative Order on Consent for Corrective Action, Docket No. VII-94-H-0024, dated September 30, 1994 (Order).

A public notice announcing the availability of the proposed remedy in the Statement of Basis and the associated supporting Administrative Record documents was published in the Independence Examiner on December 14, 2021. Fact sheets were mailed on or around December 12, 2021, to congressional and other governmental entities, local residents and businesses, and persons having previously expressed interest in environmental issues at the Facility. The Statement of Basis and Administrative Record were available throughout the public comment period at the North East Public Library, 6000 Wilson Avenue, Kansas City, Missouri; at the Department, 1730 East Elm Street, Jefferson City, Missouri; and also at the EPA Region 7 Records Center, 11201 Renner Boulevard, Lenexa, Kansas.

PUBLIC COMMENTS AND THE AGENCY'S RESPONSE

No written or oral comments were received during the public comment period; therefore, no response is required and no changes to the Statement of Basis or the proposed remedy have been made. The remedy proposed in the Statement of Basis is hereby formally selected as the final remedy for the Facility.

FUTURE ACTIONS

Within 60 days of the date this FRD was signed by the EPA (see below), the Facility will execute and record the two required environmental covenants. As no comments were received during the public comment period, the environmental covenants in Appendix B of the Post-Closure Plan that was placed on public notice should be signed and notarized by a Facility representative, with originals mailed to the Department. The Department will in turn sign, notarize and return the originals to the Facility to record with the Jackson County, Missouri recorder of deeds.

Within 60 days of the date of this FRD, the Facility will submit to the Department for final review and written approval the Post-Closure Plan, Quality Assurance Sampling and Analysis Plan (QA-SAP), recorded environmental covenants, draft financial assurance mechanism, and cost estimate (prepared as

specified in Appendix C of the Post Closure Plan placed on public notice). The Facility must submit these documents in their entirety, including figures, tables and attachments. The Department may require EPA review and approval of the QA-SAP. The revised QA-SAP must be submitted with required signatures of approval from Facility representatives.

The previously constructed cap will be inspected and maintained in accordance with procedures described in the Department-approved Post-Closure Plan.

Groundwater sampling and analysis will be performed in accordance with the provisions of the Department-approved Post-Closure Plan and QA-SAP, provided in Appendix A to the Post-Closure Plan. Groundwater standards are included in Table 1.

The requirement in the Order to submit quarterly reports ceases with this FRD.

Within 30 days of the Department's approval of the post-closure cost estimate, the Facility will establish a final financial assurance mechanism.

The Facility will update the cost estimate as specified in the Post-Closure Plan for inflation or adjusted actual costs to be approved in writing by the Department. The Facility will establish and maintain a form of financial assurance to cover the Department-approved cost estimate that is acceptable to the Department and will not change the financial assurance mechanism without prior approval from the Department.

Upon demonstration that groundwater standards have been achieved as described in the Post-Closure Plan, the Facility may request termination of groundwater monitoring by unconsolidated hydrostratigraphic unit (A, B, or C) or in total. With written approval from the Department that groundwater standards have been achieved in a unit or in total, the Facility may reduce the cost estimate accordingly to an amount approved in writing by the Department and subsequently release or partially release funds from the financial assurance instrument as directed by the Department.

When land use controls are in place (i.e., both environmental covenants are recorded with the Jackson County recorder of deeds) and a financial assurance mechanism is in place to the Department's written satisfaction, the Respondent may request termination of the Order from the EPA.

DECLARATIONS

The EPA Region 7 has determined that the actions to be implemented at the Quality Analytical Services, Inc. facility, as specified in this FRD are appropriate and will be protective of human health and the environment.

DEANDRE SINGLETARY
Digitally signed by DEANDRE SINGLETARY
Date: 2022.02.23 08:40:53 -06'00'

DeAndré Singletary, Director
Land, Chemical & Redevelopment Division

2/23/2022
Date

N:\RDD Family Office\Quality Analytical Services\Projects\2641 - Qualit l Services - Marsh Avenue 27213641.15\2019 MDNR EPA Correspondance\DWG\QA -SAP\Figure 1 ite Location From Map.dwg Jul 17, 2020 - 11:14am Layout Name: 11x17 By

DRAWING NO.	DATE:	CADD FILE:	SCS ENGINEERS	CLIENT	SHEET TITLE	REV.	DATE		CK. BY
1 of 2	7/17/20		8575 W. 110th St. Ste. 100 Overland Park, Kansas 66210 PH. (913) 681-0030 FAX. (913) 681-0012	QUALITY ANALYTICAL SERVICES 1633 MARSH AVENUE KANSAS CITY, MISSOURI	GENERAL SITE LOCATION FROM MAP	△	–		–
			PROJ. NO. 27213641.15 / DSGN. BY: MBJ / Q/A RVW BY: JJR			△	–		–
			DRN. BY: JJR / CHK. BY: JJR / PROJ. MGR: JJR		PROJECT TITLE POST-CLOSURE PLAN	△	–		–
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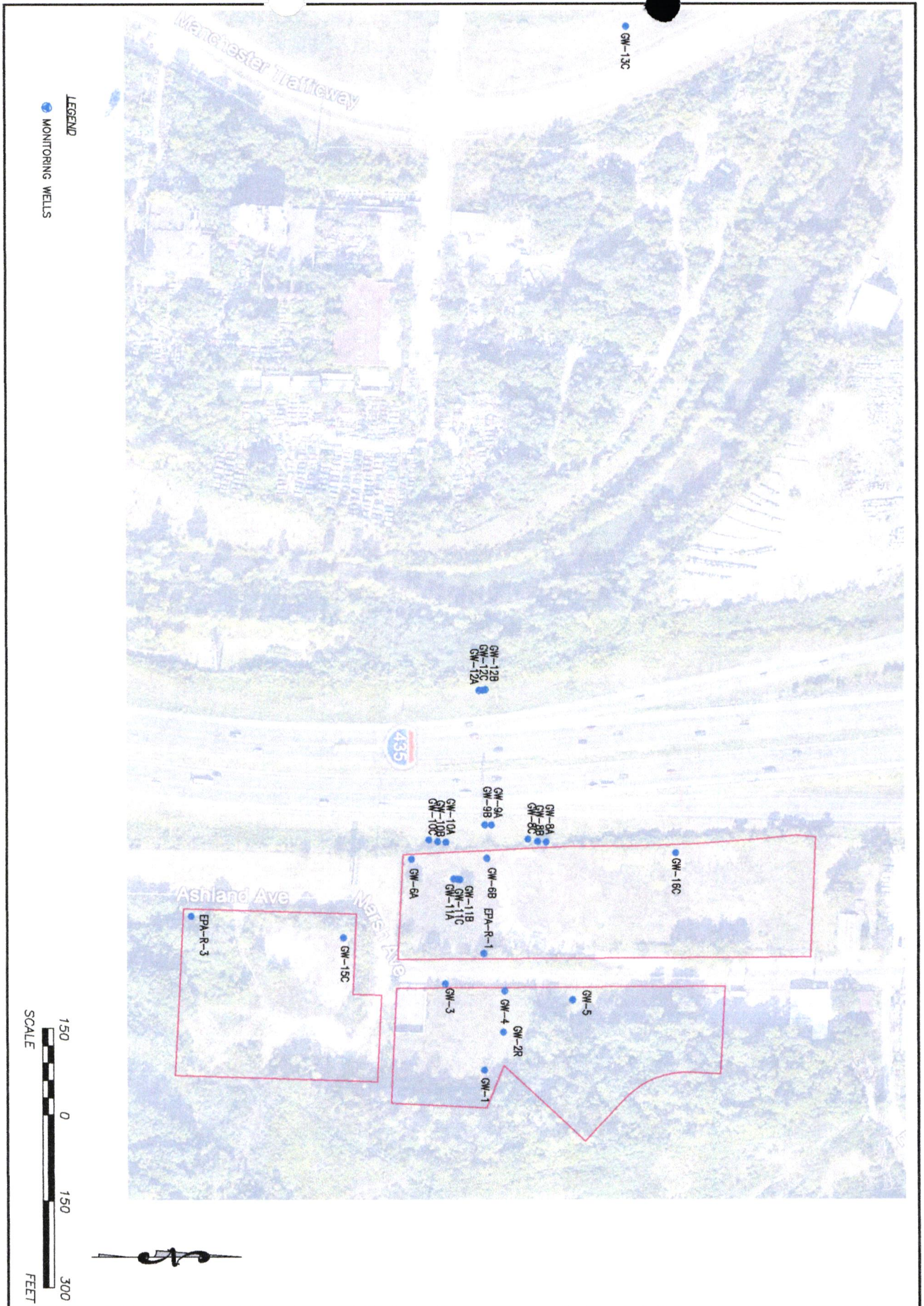

FIGURE NO.	DATE:	CADD FILE:		CLIENT	SHEET TITLE	REV.	DATE		CK. BY
2 of 2	6/14/21		**SCS ENGINEERS** 8575 W. 110th St, Ste. 100 Overland Park, Kansas 66210 PH. (913) 681-0030 FAX. (913) 681-0012 PROJ. NO. 27213641.15 · DWN. BY: ALR · Q/A RVW BY: JRR CHK. BY: JRR · APP. BY: JRR · PROJ. MGR: JRR	**QUALITY ANALYTICAL SERVICES** 1633 MARSH AVENUE KANSAS CITY, MISSOURI	**WELL LOCATION MAP** PROJECT TITLE **POST-CLOSURE PLAN**	△	–		–

Table 1 Groundwater Standards
Quality Analytical Services
1633 Marsh Avenue
Blue Summit, Missouri
EPA ID Number MOD0730274609

Parameter	Units	Groundwater Standards	Safe Drinking Water Standard Federal MCL, AL for Lead	Missouri Water Quality Standard Protection of Groundwater/Drinking Water Supply	EPA Regional Screening Levels (tapwater) RSL 10^{-5}	EPA Regional Screening Levels (tapwater) THQ=0.1
Volatile Organic Compounds						
1,1-Dichloroethane	µg/l	28			28	
1,2,4-Trimethylbenzene	µg/l	5.6				5.6
1,3,5-Trimethylbenzene	µg/l	6				6
1,4-Dioxane	µg/l	4.6			4.6	
Benzene	µg/l	5	5			
cis-1,2-Dichloroethene	µg/l	70	70			
Naphthalene	µg/l	20		20 HAL		
Trichloroethene	µg/l	5	5			
Vinyl chloride	µg/l	2	2			
Total Metals						
Arsenic	µg/l	10	10			
Nickel	µg/l	100		100		
Manganese	µg/l	50		50		43 /430 *
Vanadium	µg/l	8.6				8.6

µg/l = micrograms per liter
RSL = regional screening level, target cancer risk 10^{-5}, maintained by EPA, May 2021
MCL = maximum contaminant level
THQ = target hazard quotient
HAL = Health Advisory Level
* = HQ equal to 0.1 / HQ equal to 1