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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Alex Moon
Bureau Chief, Land Quality Bureau
Iowa Department of Natural Resources
Wallace State Office Building
502 East 9th Street, 4th Floor
Des Moines, IA 50319-0034

Re: Des Moines TCE Site, Des Moines, IA

Dear Mr. Moon:

Enclosed please find a hazardous waste determination memo that we previously discussed regarding the demolition of the buildings at the Des Moines TCE Site. It details EPA's considerations regarding disposition of building demolition debris, in light of the documented contamination within the buildings. In summary:

DRAFT

- Asbestos contaminated building materials, including roofing tar and boiler/piping insulation, require abatement. IDNR staff has indicated that they are familiar with, and will follow, proper building demolition asbestos abatement procedures.

- PCB-containing insulation and surrounding building materials are considered PCB Bulk Product Waste. The PCB-containing insulation, yellow insulation with a foil backing, may be disposed of in a solid waste landfill if it contains less than 50 parts per million (ppm) PCBs. EPA's reading of Iowa law indicates that PCB-containing insulation with concentrations over 50 ppm cannot be disposed of in a landfill. Iowa has indicated that a special waste waiver may be applicable.

- Given the use of pure aldrin that occurred in Building 4 and the Maintenance Building, debris from the remaining foundation of Building 4 and the Maintenance Building is considered P-listed hazardous waste. As listed hazardous waste, demolition debris from the maintenance building and the foundation of Building 4 would be disposed of in a hazardous waste landfill.

- Buildings 1-3 and the foundation of Building 5 exhibit hazardous waste characteristics. Therefore, the Toxicity Characteristic Leaching Procedure (TCLP) would be conducted on building demolition debris from Buildings 1-3 and the foundation of Building 5 to determine whether those materials are characteristic hazardous wastes prior to disposal. Building demolition debris from Buildings 1-3 and the foundation of Building 5 that fails TCLP would be disposed of in a hazardous waste landfill.

If you have any questions or would like to discuss the information contained in this letter, please do not

hesitate to contact me at 913-551-7882 or at peterson.mary@epa.gov.

Sincerely,

Mary P. Peterson
Director
Superfund Division

Enclosure

cc: Charles F. Becker, Belin McCormick

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