



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

MAR 01 2011

MEMORANDUM

OFFICE OF
THE REGIONAL ADMINISTRATOR

SUBJECT: EPA Should Improve Its Oversight of Long-Term Monitoring
at Wheeling Disposal Superfund Site in Missouri
Report No. 11-P-0034

FROM: Karl Brooks
Regional Administrator

TO: Arthur A. Elkins, Jr.
Inspector General

Region VII agreed to implement all Office of Inspector General (OIG) recommendations in my November 24, 2010 response, to the draft evaluation report. The following provides you with the current status of our corrective actions.

OIG Recommendation 1: Ensure updated and correct standards for surface water and groundwater are used to assess conditions at the site and that these corrected standards are listed in relevant site documents.

Response: Region VII concurs with this recommendation.

Region VII instructed the Wheeling Potentially Responsible Party (PRP) group to review and update performance standards. On January 26, 2011, Region VII received an updated list of surface water and ground water performance standards. Region VII verified the accuracy of the updated standards. The updated performance standards will be incorporated into the annual sampling reports submitted by the Wheeling PRP group for future monitoring events conducted at the Wheeling Disposal Site.

OIG Recommendation 2: Require that the reporting limits for all analyses are at or below the applicable standards to ensure that all contamination above the standards is properly analyzed by the laboratory.

Response: Region VII concurs with this recommendation.

Region VII has confirmed that the Wheeling PRP group is working with the laboratory to review all analytic methods to ensure that proper reporting limits will be achieved for all future analysis conducted for the Wheeling Disposal Site. The review of analytic methods will be completed by June 30, 2011. Region VII is monitoring these actions and

will verify proper analytic methods were utilized for future monitoring events conducted at the Wheeling Disposal Site.

OIG Recommendation 3: Document in an addendum to the 2009 Five-Year Review that iron, aluminum, and any other compounds exceeding applicable standards are controlled at the site.

Response: Region VII concurs with this recommendation.

Region VII will document in an addendum to the 2009 Five-Year Review that iron, aluminum, and any other compounds exceeding applicable standards are controlled at the site. This action will be completed by September 30, 2011.

OIG Recommendation 4: Complete an ecological risk assessment to determine whether changes to the remedy are necessary and, if so, amend or generate new site documents, including the Record of Decision, to ensure the site is protective of the environment. Issue an addendum to the 2009 Five-Year Review to include the results of the ecological risk assessment.

Response: Region VII concurs with this recommendation.

Region VII completed a Screening Level Ecological Risk Assessment (SLERA) for the Wheeling Disposal site on October 13, 2010. The result of the SLERA is that the remedy for the site is protective of the environment, and no changes to the remedy are necessary. Therefore, a further ecological risk assessment is not necessary.

Region VII will issue an addendum to the 2009 Five-Year Review by September 30, 2011. The addendum will include the results of the ecological risk assessment, and state that Region VII has found the remedy to be both protective of human health and the environment.

Should you have any questions concerning this response and/or Region VII's corrective actions, please contact DeAndre Singletary, Chief, Missouri/Kansas Remedial Branch at (913) 551-7373, or Kathy Finazzo, Regional Audit Follow-Up Coordinator, at (913) 551-7833.