



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

9 SEP 2003

CON 12-15
Doc #16743

Mr. Cal Lundberg
Supervisor, Uncontrolled Sites
Iowa Department of Natural Resources
Wallace State Office Building
502 E. 9th St.
Des Moines, Iowa 50319

Dear Mr. Lundberg:

Enclosed are copies of the Abbreviated Preliminary Assessments that were completed for the Fickbohm Farm Site, Lytton, Iowa; the Fort Dodge Containers Site, Fort Dodge, Iowa; and the Woodbury County Drums Site, Salix, Iowa. These assessments were prepared by the Region 7 U. S. Environmental Protection Agency (EPA), under the Superfund Technical Assessment and Response Team 2 contract, to fulfill Superfund site assessment requirements.

These Abbreviated Preliminary Assessments are being provided to you for inclusion in your Superfund site files. If you have any questions or comments, please call me at (913) 551-7568.

Sincerely,

Ronald King
Site Assessment Team Leader
Enforcement/Fund-Lead Removal Branch
Superfund Division

Enclosures

2003 SEP 15 A 8:43
DEPT. OF
NATURAL RESOURCES

fn 60
Site: Fickbohm Farm
ID # IAN000703735
Break: 5
Other: SRD 8-13-02

**ABBREVIATED PRELIMINARY ASSESSMENT
FICKBOHM FARM SITE - LAWTON, IOWA
CERCLIS ID: IAN000703735**

**Superfund Technical Assessment and Response Team (START) 2 Contract
Contract No. 68-S7-01-41, Task Order No. 0094.00**

Prepared for:

U.S. Environmental Protection Agency
Region 7
901 North 5th Street
Kansas City, Kansas 66101

August 13, 2002

Prepared by:

Tetra Tech EM Inc.
8030 Flint Street
Lenexa, Kansas 66214
(913) 894-2600



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1.0 INTRODUCTION

Tetra Tech EM Inc. (Tetra Tech) was tasked by the Region 7 U.S. Environmental Protection Agency (EPA), under the Superfund Technical Assessment and Response Team (START) 2 contract, Contract No. 68-S7-01-41, Task Order No. 00094.00, to conduct an Abbreviated Preliminary Assessment (APA) for the Fickbohm Farm Site in Lawton, Iowa. The objectives of the APA included:

- Review the EPA Superfund site file.
- Prepare an APA for the site, following the guidance document, and complete the APA Checklist in Attachment A of the guidance document.

The Fickbohm Farm Site was an Emergency, Fund-Lead Removal Action (FLRA) undertaken by EPA. The Fickbohm Farm Site came to the attention of the EPA Emergency Response and Removal Branch (ERRB) through Gary Brown of the Woodbury County Local Emergency Planning Commission (LEPC) (EPA 2000a). An Imminent and Substantial Endangerment document was initiated based on data and information provided by the Woodbury County LEPC (EPA 2000b). It was determined that failure to respond to contamination present at the site could result in additional exposure of livestock and humans. EPA conducted removal actions at the Fickbohm Farm Site on September 29 and December 10, 2000 (EPA 2001).

Because a Potential Hazardous Waste Site Identification form was completed, the site was entered into the Comprehensive Environmental Response, Compensation, and Liability Act Information System (CERCLIS) as a potential hazardous waste site in 2000. CERCLIS entry triggers the requirement to complete a Preliminary Assessment (PA) under the provisions of the National Contingency Plan (NCP). As warranted under the provisions of the NCP, once this site was entered into CERCLIS, an APA was required to determine whether further Comprehensive Environmental Response Compensation and Liability Act (CERCLA) investigative actions were necessary at the site.

EPA has made a determination that no further removal or remedial action is required or planned at the site. Therefore, the Fickbohm Farm Site qualifies for an APA, in accordance with Section 2.2.4 of the EPA Guidance for Performing PAs Under CERCLA and Section 300.420 of the NCP (EPA 1997).

This APA has been prepared to satisfy the administrative requirements of the NCP with regard to PA documentation. An APA Checklist has been prepared for the site and is attached to this report (see

was 13 percent aldrin. After being informed that the substance contained aldrin, the property owner containerized the substance, placed it in trash sacks, and stored the material in a locked garage.

EPA conducted a removal action at the Fickbohm Farm Site on September 29, 2000 (EPA 2001). A preliminary survey of the area indicated that the aldrin was dumped into the manger about 20 to 40 years ago. Since that time, aldrin had migrated onto the floor of the barn and into the surrounding wood of the manger. The removal action consisted of containerization of the contents of the manger, where the substance had been discovered; removal of about 4 cubic yards (yd³) of soil; and sampling. All removed materials were left on the site, pending future disposal of the materials. The results of the sampling analysis indicated that elevated levels of aldrin were still present in excavated areas inside of the barn.

EPA conducted a second removal action at the site on December 10, 2000 (EPA 2001). An additional 1.5 yd³ were removed and on-site immunoassay kits were used to verify that clean conditions were present at the site after completion of the removal action. All contaminated material was removed from the site for final disposal on December 11, 2001 (Tetra Tech 2002).

3.0 CONCLUSIONS

Based on the response action taken by EPA at the site, it has been determined that no significant threat to human health or the environment remains at the site. Sampling was conducted at the site during the second removal action on December 10, 2000, to verify that all contamination had been removed from the site (EPA 2001). All contaminated material has been removed from the site (Tetra Tech START 2002). The site does not present a significant threat to any future residents, the surrounding population, or the environment.

Attachment B). The following documents were obtained from a file review for the site and are also attached to this report: EPA Form 2070-11: Potential Hazardous Waste Site - Site Identification; Finding of Imminent and Substantial Endangerment - Fickbohm Farm Site, Lutton, Iowa, dated August 4, 2000; Site Progress Report, dated October 23, 2000; Amended Finding of Imminent and Substantial Endangerment - Fickbohm Farm Site, Lutton, Iowa, dated January 2, 2001; and Site Progress Report, dated November 23, 2001 (see Attachment C).

2.0 SITE DESCRIPTION, OPERATIONAL HISTORY, AND WASTE CHARACTERISTICS

The following subsections present information about the site, its operational history, and wastes.

2.1 LOCATION

The Fickbohm Farm Site is located in western Iowa, about 2 miles north and 2 miles west of Lawton, Iowa, in Woodbury County. The address for the site is 1718 140th Street, Lawton, Iowa. The site is located in the northwest quarter of the northwest quarter of Section 26, Township 89 north, Range 46 west (United States Geological Survey 1985) (see Attachment 1). The site is located approximately 0.25 mile west of Big Whisky Creek. An unnamed stream is located about 750 feet north of the site.

2.2 SITE DESCRIPTION

The site consists of a barn on a farm that is currently owned by John Belhist (EPA 2001). A substance containing aldrin had been either dumped or abandoned in a manger inside of the barn. The current owner of the property had indicated that the barn was in an advanced state of disrepair and would be removed and disposed of after the area was cleaned (EPA 2000b).

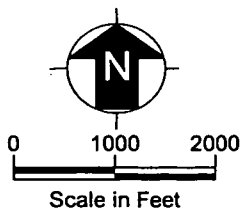
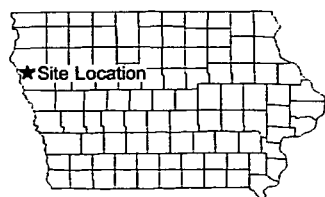
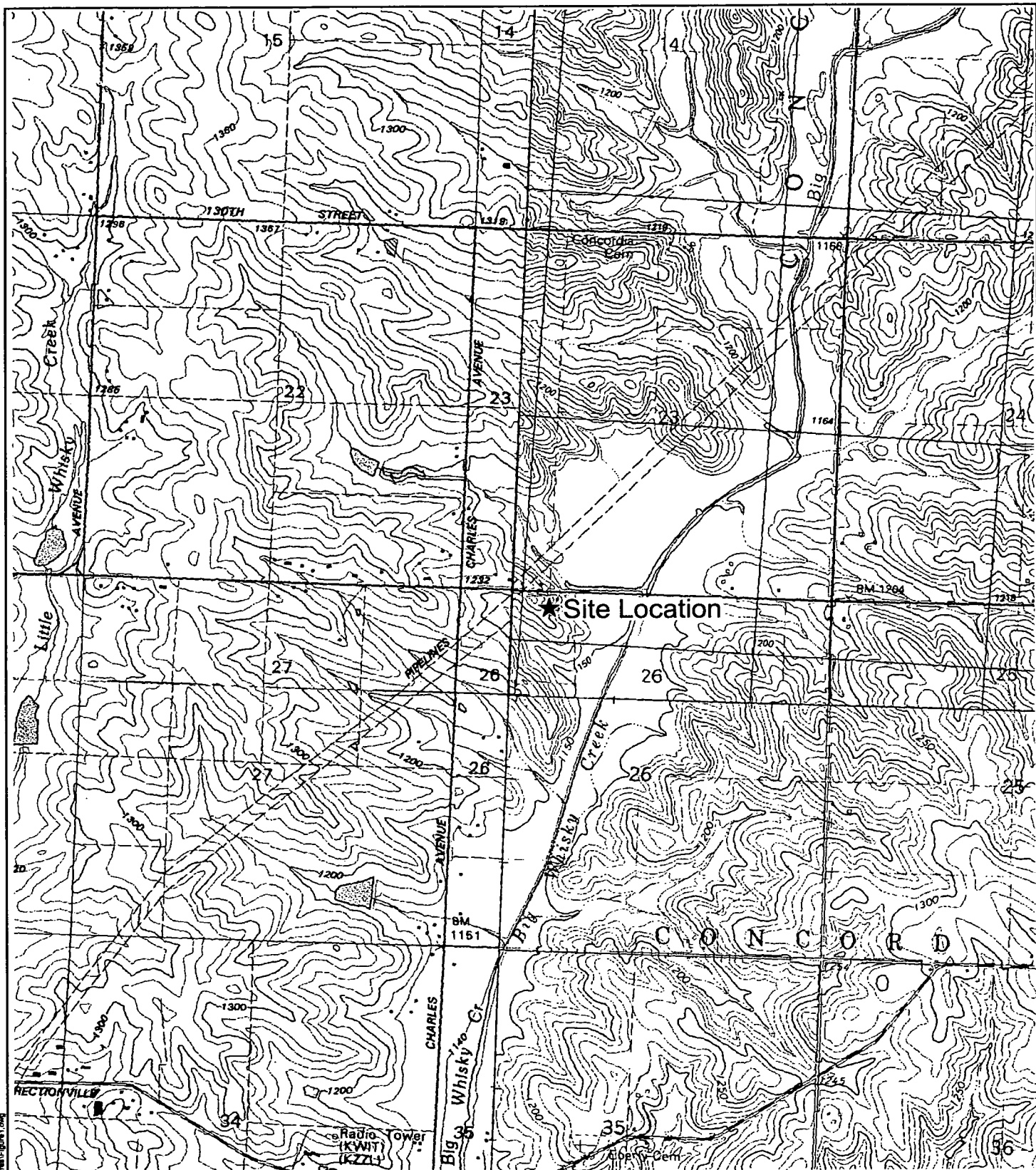
2.3 OPERATION HISTORY AND WASTE CHARACTERISTICS

The Fickbohm Farm site was an Emergency, FLRA undertaken by EPA. The Fickbohm Farm Site came to the attention of the EPA ERRB through Mr. Brown of the Woodbury County LEPC (EPA 2000a). Mr. Brown indicated that a horse had died after being stabled in an old barn at the site. A cursory investigation of the site indicated that a white crystalline compound was present inside of the barn. The results of a laboratory analysis that the property owner had conducted for the substance indicated that it

4.0 REFERENCES

- U.S. Environmental Protection Agency (EPA). 1997. Interoffice Memorandum Regarding Legal Requirements for CERCLA Preliminary Assessments. From David Cozad, Office of Regional Counsel, Environmental Protection Agency (EPA) Region 7. To Paul Doherty, Superfund Division, EPA Region 7. November 13.
- EPA. 2000a. "Finding of Imminent and Substantial Endangerment - Fickbohm Farm Site, Lutton, Iowa." August.
- EPA. 2000b. "Site Progress Report." October.
- EPA. 2001. "Site Progress Report." November.
- Tetra Tech EM Inc. (Tetra Tech START). 2002. Record of Telephone Conversation Regarding Fickbohm Farm site in Lawton, Iowa. Between Dean I. Williams, Environmental Engineer, Tetra Tech EM Inc. Superfund Technical Assessment and Response Team, and Mark Thomas, On-Scene Coordinator, EPA. August 8.
- U.S. Geological Survey. 1985. 7.5-Minute Topographic Map, Union Center Southwest, Iowa, Quadrangle. Washington, DC.

APPENDIX A
SITE LOCATION MAP
(One Page)



Fickbohm Farm Site
1718 140th Street
Lawton, Iowa 50561

Figure 1
Site Location Map



Tetra Tech EM Inc.

Source: USGS James, IA 7.5 Minute Topo Quad, 1994
USGS Lawton, IA 7.5 Minute Topo Quad, 1964
USGS Sergeant Bluff, IA 7.5 Minute Topo Quad, 1993
USGS Union Center SW, IA 7.5 Minute Topo Quad, 1985

Date: 08/01/02

Drawn By: Roger Stull

Project No: G9011.L.02.0094.00

APPENDIX B
ABBREVIATED PRELIMINARY ASSESSMENT CHECKLIST
(Four Pages)

ABBREVIATED PRELIMINARY ASSESSMENT CHECKLIST

This checklist can be used to help the site investigator determine if an Abbreviated Preliminary Assessment (APA) is warranted. This checklist should document the rationale for the decision on whether further steps in the site investigation process are required under CERCLA. Use additional sheets, if necessary.

Checklist Preparer: Dean I. Williams, Environmental Engineer 8/7/2002
 (Name/Title) (Date)
Tetra Tech EM, Inc./8030 Flint Street/Lenexa, Kansas 66214 913-495-3915
 (Address) (Phone)
dean.williams@ttemi.com
 (E-Mail Address)

Site Name: Fickbohm Farm Site

Previous Names (if any): NA

Site Location: 1718 140th Street
 (Street)
Lawton, IA 50561
 (City) (ST) (Zip)

Latitude: 42°30'13"N Longitude: 96°14'52"W

Describe the release (or potential release) and its probable nature: A substance containing aldrin was discovered in a barn at the site. The substance was dumped into a manger in the barn 20 to 40 years ago. The manger and floor of the barn were found to be contaminated.

Part 1 – Superfund Eligibility Evaluation

If all answers are "no" go on to Part 2, otherwise proceed to Part 3.

| | YES | NO |
|---|-------------------------------------|-------------------------------------|
| 1. Is the site currently in CERCLIS or an "alias" of another site? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 2. Is the site being addressed by some other remedial program (Federal, State, or Tribal)? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 3. Are the hazardous substances potentially released at the site regulated under a statutory exclusion (e.g., petroleum, natural gas, natural gas liquids, synthetic gas usable for fuel, normal application of fertilizer, release located in a workplace, naturally occurring, or regulated by the NRC, UMTRCA, or OSHA)? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 4. Are the hazardous substances potentially released at the site excluded by policy considerations (i.e., deferred to RCRA corrective action)? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 5. Is there sufficient documentation to demonstrate that no potential for a release that could cause adverse environmental or human health impacts exists (e.g., comprehensive remedial investigation equivalent data showing no release above ARARs, completed removal action, previous HRS score determined, or an EPA approved risk assessment completed)? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Please explain all "yes" answer(s).

1. The site was entered into CERCLIS in 2000.

2. EPA conducted removal actions at the site on September 29 and December 10, 2000. The removal action is complete and all contaminated material has been removed from the site.

Part 2 – Initial Site Evaluation

For Part 2, if information is not available to make a “yes” or “no” response, further investigation may be needed. In these cases, determine whether an APA is appropriate. Exhibit 1 parallels the questions in Part 2. Use Exhibit 1 to make decisions in Part 3.

If the answer is “no” to any of questions 1, 2, or 3, proceed directly to Part 3.

| | YES | NO |
|--|-------------------------------------|-------------------------------------|
| 1. Does the site have a release or a potential to release? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 2. Does the site have uncontained sources containing CERCLA eligible substances? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 3. Does the site have documented on-site, adjacent, or nearby targets? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

If the answers to questions 1, 2, and 3 above were all “yes”, then answer the questions below before proceeding to part 3.

| | YES | NO |
|---|--------------------------|--------------------------|
| 4. Does documentation indicate that a target (e.g., drinking water wells, drinking surface water intakes, etc.) has been exposed to a hazardous substance released from the site? | <input type="checkbox"/> | <input type="checkbox"/> |
| 5. Is there an apparent release at the site with no documentation of exposed targets, but there are targets on site or immediately adjacent to the site? | <input type="checkbox"/> | <input type="checkbox"/> |
| 6. Is there an apparent release and no documented on-site targets or targets immediately adjacent to the site, but there are nearby targets (e.g., targets within 1 mile)? | <input type="checkbox"/> | <input type="checkbox"/> |
| 7. Is there no indication of a hazardous substance release, and there are uncontained sources containing CERCLA hazardous substances, but there is a potential to release with targets present on site or in proximity to the site? | <input type="checkbox"/> | <input type="checkbox"/> |

Notes:

EXHIBIT 1
SITE ASSESSMENT DECISION GUIDELINES FOR A SITE

Exhibit 1 identifies different types of site information and provides some possible recommendations for further site assessment activities based on that information. You will use Exhibit 1 in determining the need for further action at the site, based on the answers to the questions in Part 2. Please use your professional judgment when evaluating a site. Your judgment may be different from the general recommendations for a site given below.

| Suspected/Documented Site Conditions | | APA | Full PA | PA/SI | SI |
|---|--------------------|-----|---------|-------|-----|
| 1. There are no releases or potential to release. | | Yes | No | No | No |
| 2. No uncontained sources with CERCLA-eligible substances are present on site. | | Yes | No | No | No |
| 3. There are no on-site, adjacent, or nearby targets | | Yes | No | No | No |
| 4. There is documentation indicating that a target (e.g., drinking water wells, drinking surface water intakes, etc.) has been exposed to a hazardous substance released from the site. | Option 1: APA → SI | Yes | No | No | Yes |
| | Option 2: PA/SI | No | No | Yes | NA |
| 5. There is an apparent release at the site with no documentation of exposed targets, but there are targets on site or immediately adjacent to the site. | Option 1: APA → SI | Yes | No | No | Yes |
| | Option 2: PA/SI | No | No | Yes | NA |
| 6. There is an apparent release and no documented on-site targets and no documented targets immediately adjacent to the site, but there are nearby targets. Nearby targets are those targets that are located within 1 mile of the site and have a relatively high likelihood of exposure to a hazardous substance migration from the site. | | No | Yes | No | No |
| 7. There is no indication of a hazardous substance release, and there are uncontained sources containing CERCLA hazardous substances, but there is a potential to release with targets present on site or in proximity to the site. | | No | Yes | No | No |

Part 3 – EPA Site Assessment Decision

When completing Part 3, use Part 2 and Exhibit 1 to select the appropriate decision. For example, if the answer to question 1 in Part 2 was “no,” then an APA may be performed and the “NFRAP” box below should be checked. Additionally, if the answer to question 4 in Part 2 is “yes,” then you have two options (as indicated in Exhibit 1): Option 1 – conduct an APA and check the “Lower Priority SI” or “Higher Priority SI” box below; or Option 2 – proceed with a combined PA/SI assessment.

Check the box that applies based on the conclusions of the APA:

- | | |
|---|--|
| <input checked="" type="checkbox"/> NFRAP | <input type="checkbox"/> Refer to Removal Program – further site assessment needed |
| <input type="checkbox"/> Higher Priority SI | <input type="checkbox"/> Refer to Removal Program – NFRAP |
| <input type="checkbox"/> Lower Priority SI | <input type="checkbox"/> Site is being addressed as part of another CERCLIS site |
| <input type="checkbox"/> Defer to RCRA Subtitle C | <input type="checkbox"/> Other: _____ |
| <input type="checkbox"/> Defer to NRC | |

Regional EPA Reviewer: _____

Print Name/Signature

Date

PLEASE EXPLAIN THE RATIONALE FOR YOUR DECISION: _____

NOTES:

APPENDIX C
COPY OF INFORMATION LOCATED IN ENVIRONMENTAL PROTECTION AGENCY
FILES
(15 Pages)

**U.S. ENVIRONMENTAL PROTECTION AGENCY
SITE PROGRESS REPORT**

I. HEADING

Date: November 23, 2001

Subject: Fickbohm Farm Site
Lawton, Iowa

From: Mark J. Thomas, On-Scene Coordinator
U.S. EPA, Region 7

To: Larry Zaragoza, Director (5203G)
Regions 5/7 Accelerated Response Center

Report: Final

II BACKGROUND

Site No.: A760
Delivery Order No.: 0007
Response Authority: CERCLA, 104(a)
ERNS No.:
CERCLIS No.:
NPL Status: Not Nationally Significant
State Notification: IDNR notified
Action Memorandum Status: Signed August 4, 2000
Start Date: September 29, 2000
Demobilization Date: December 11, 2001
Completion Date: November 23, 2001

III. SITE INFORMATION

A. Incident Category

Midnight Dump

B. Site Description

1. Site Location

The Fickbohm farm site is located in rural western Iowa approximately 2 miles north and 2 miles west of the town of Lawton. The address for the site is 1718 140th Street, Lawton, Iowa. The site consist of dumped/abandoned pesticides in an old agricultural structure on the Fickbohm farm.

2. Description of Threat

Attention to the Fickbohm Farm site came to the attention of ER&R personnel through a phone call from the Woodbury County, Iowa LEPC, Gary Brown. Mr. Brown indicated that a horse had died after be stabled in an old barn on the Fickbohm Farm. A cursory investigation of the site indicated that a white crystalline compound was present in the barn. Subsequent laboratory analysis of the compound by the property owner indicated that the compound was 13 percent aldrin. The origin of the aldrin is unknown but was probably placed in the barn by a previous owner. Upon discovery that the material was aldrin, the owner promptly containerized any visible product, secured the product in trash sacks and is currently storing the material in a locked garage.

The death of the horse occurred during a pending sale of the property. Mr. John Belhist, the current owner, has agreed to access to the property for sampling and disposal of contaminated soil.

C. Preliminary Assessment Results

Preparation of an Imminent and Substantial Endangerment document was initiated based on data and information provided by the Woodbury County LEPC. Discussions with the current owner indicated that the structure containing the contaminate is in an advanced state of disrepair. Failure to respond to the contamination may have resulted in additional exposure to livestock and humans.

The Woodbury County LEPC indicated that an autopsy conducted on the horse showed high levels of an organophosphorus compound. Additional investigation by the county indicated that the material was aldrin.

IV. RESPONSE INFORMATION

A. Situation

1. Current Situation

EPA responded to site with the general plan to recover the abandoned pesticide and remove soils if necessary. A preliminary survey of the area indicated that the aldrin was dumped into an old manger within the structure approximately 20 to 40 years ago. Over the years, some of the material had migrated onto the barn floor and into the surrounding wood. A discussion with the current owner indicated that once the area is cleaned, the barn will be removed and disposed.

2. Removal Activities to Date.

On September 29, 2000, EPA conducted a removal action at the Fickbohm farm site consisting of containerizing of the manger and contents and the removal of approximately 4 yards of soil. All removed materials were stored onsite pending disposal.

Soil samples collected from the barn floor and other surface samples indicated that elevated levels of aldrin remained in the excavated areas inside the barn.

A second round of excavation was conducted on December 10, 2000, with the additional removal of approximately 1.5 yards of material. Clean criteria was assessed using on-site essay kits. Final disposal of all material was conducted on December 11, 2001.

3. Enforcement

The individual suspected of dumping/abandoning the pesticide is no longer an owner of the property. The recent owners had no knowledge of this material and only discovered the abandoned product after the death of the horse.

B. Next Steps

The removal action is complete. No further actions are planned or anticipated for this site.

C. Key Issues

None

V. COST INFORMATION

The Fickbohm farm site action was conducted using an 8A Fixed price contract. The total cost for this removal action was \$22,390.96.

VI. DISPOSITION OF WASTES

| Wastestream | Medium | Quantity | Containment-Migration Control | Treatment | Disposal |
|-------------|--------|----------|-------------------------------|-----------|--------------|
| Aldrin | Soil | 4 yards | Excavation | | Incineration |

cc: James Gulliford, RGAD
Michael J. Sanderson, SUPR
Andrea Jirka, SDDD
Ken Buchholz, EFLR
Bob Jackson, ER&R
Antoinette Singletary, ER&R

Karen Flournoy, OEP
Marie Noel, OEP
Joleen Werst, STAR
David Hoefer, CNSL
Teri Hankins, SUPR

Joe Chandler, FEMA
Robert Stewart, DOI
Susan Dixon, IDNR
Craig Beasley, 5203G
Kevin Mould, 5204G



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

02 JAN 2001

AMENDED FINDING OF IMMINENT AND SUBSTANTIAL ENDANGERMENT

Fickbohm Farm Site

Luton, Iowa

Based on the factors outlined below, I have determined that a threat exists to the public health or welfare or the environment at this site/incident. An imminent and substantial endangerment to the public health or welfare or the environment exists because of an actual or threatened release of a hazardous substance at or from the incident. This Finding of Imminent and Substantial Endangerment is being amended to increase the estimated costs to include the incineration of pesticide-contaminated soil.

I. SITE INFORMATION

Site Name: Fickbohm Farm Site
Site Number: A760
Site Location: Luton, Iowa
Potentially Responsible Party: Unknown
Access: ☐ Restricted ☒ Unrestricted

NPL Status: This site is not on or is anticipated to be on the NPL

Category of Removal: Time-Critical

Removal Start Date: September 29, 2000

II. THREAT TO THE PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT

A. Site Background

The Fickbohm Farm site came to the attention of the Emergency Response & Removal (ER&R) Branch through a phone call from a Woodbury County, Iowa LEPC member, Gary Brown. Mr. Brown indicated that a horse had died after being stabled in an old barn on the Fickbohm Farm. The death of the horse occurred during a pending sale of the property. Mr. John Belhist, the current owner, has agreed to allow access to the property for sampling and disposal of contaminated soil. A cursory investigation of the site indicated that a white crystalline compound was present in the barn. Subsequent laboratory analysis of the compound by the property owner indicated that the compound was 13 percent aldrin. The origin of the aldrin is unknown but was probably placed in the barn by a previous owner.

The Environmental Protection Agency (EPA) responded to the site with the general plan to recover the abandoned pesticide and remove soils if necessary. A preliminary survey of the area indicated that the aldrin was dumped into an old manger within the structure approximately 20 to 40 years ago. Over the years, some of the material had migrated onto the barn floor and into the surrounding wood. A discussion with the current owner indicated that once the area is cleaned, the barn will be removed and disposed.

B. Hazardous Substances Present:

A cursory investigation of the site indicated that a white crystalline compound was present in the barn. Subsequent laboratory analysis of the compound by the property owner indicated that the compound was 13 percent aldrin. Upon discovery that the material was aldrin, the owner promptly containerized any visible product, secured the product in trash sacks and is currently storing the material in a locked garage.

On September 29, 2000, the EPA conducted a removal action at the Fickbohm farm site consisting of containerizing contents of the manger and the removal of approximately 4 cubic-yards of soil. All removed materials were stored on the site pending disposal.

At the time of the on-site removal actions, a disposal contractor was selected with the anticipated disposal option being soil fixation and landfilling. After selection of the disposal firm, the on-scene coordinator (OSC) conducted an off-site policy check and found the firm to be in poor standing. The removal contractor was instructed to locate an alternate firm. The current firm has been found to be in good standing but can only treat the soil by incineration. **Accordingly, an increase in the contract ceiling will be required.**

C. Nature of Actual or Threatened Release of Hazardous Substance:

The aldrin discovered at the Fickbohm Farm site is a banned pesticide and is known to be toxic and hazardous. The material is currently being stored in a locked garage. It is probable that additional material remains in the barn and will warrant additional sampling and excavation. In the event of a fire or other mishap, release of material from the barn will occur.

Check applicable factors (from 40 CFR 300.415) which were considered in determining the appropriateness of a removal action:

xx 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)].

xx 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 [300.415(b)(2)(iv)].

xx Weather conditions that may cause hazardous substances or pollutants to migrate or to be released [300.415(b)(2)(v)].

xx 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)].

xx Other situations or factors that may pose threats to the public health or welfare or the environment [300.415(b)(2)(viii)].

III. SELECTED REMOVAL ACTION

The selected removal action will include sampling the barn floor and mangers for additional product identification. If additional material is discovered, soil and/or the barn structure will be removed and containerized. All waste will be shipped to an off-site disposal site. Pending disposal, all waste product will be stored in a secure location.

Due to a time factor, sampling will be conducted by ER&R personnel. Laboratory services will be procured by the removal contractor from a local source. This will permit rapid return of analytical data.

IV. ESTIMATED COSTS

Extramural Costs

| | |
|----------------------------------|--------------|
| Regional Removal Allowance Costs | \$24,000 |
| Increase for Incineration | 5,000 |
| Other Extramural Costs | <u>1,000</u> |
| Subtotal, Extramural Costs | \$30,000 |

Intramural Costs

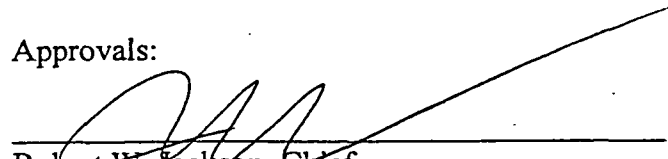
\$ 5,000

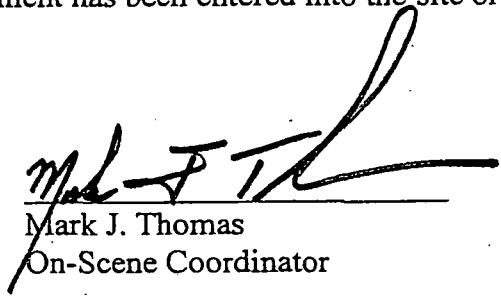
TOTAL, REMOVAL PROJECT CEILING

\$35,000

This finding of imminent and substantial endangerment has been entered into the site or incident's administrative record.

Approvals:


Robert W. Jackson, Chief
Emergency Response & Removal Branch


Mark J. Thomas
On-Scene Coordinator

2 JAN 2001
(Date)

AUG 4 2000

FINDING OF IMMINENT AND SUBSTANTIAL ENDANGERMENT

Fickbohm Farm Site

Luton, Iowa

Based on the factors outlined below, I have determined a threat exists to the public health or welfare or the environment at this site/incident. An imminent and substantial endangerment to the public health or welfare or the environment exists because of an actual or threatened release of a hazardous substance at or from the incident.

I. SITE INFORMATION

Site Name: Fickbohm Farm Site
Site Number: A760
CERCLIS ID: IAN000703735
Site Location: Luton, Iowa
Potentially Responsible Party: Unknown
Access: _____ Restricted _____ Unrestricted xxx

NPL Status: This site is not on or is anticipated to be on the NPL

Category of Removal: Time-Critical

II. THREAT TO THE PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT

A. Site Background

The Fickbohm Farm site is located in rural Woodbury County, Iowa, and came to the attention of the Emergency Response & Removal (ER&R) Branch through a telephone call from a Woodbury County, Iowa LEPC member, Gary Brown. Mr. Brown indicated a horse had died after being stabled in an old barn on the Fickbohm Farm.

B. Hazardous Substance Present

A cursory investigation of the site, by local responders, indicated a white crystalline compound was present in the barn. Subsequent laboratory analysis of the compound by the property owner indicated the compound was 13 percent aldrin. The origin of the aldrin is unknown but was probably placed in the barn by a previous owner. Upon discovery that the material was aldrin, the owner promptly containerized any visible product, secured the product in trash sacks and is currently storing the material in a locked garage.

SUPR/Thomas/Jackson/Rabenau/08/04/00

Action Memo 2/Fickbohm Farm

ER&R
Thomas

ER&R
Jackson

ER&R
Singletary

ER&R
Crossland

All prior signatures remain valid

FINDING OF IMMINENT AND SUBSTANTIAL ENDANGERMENT

AUG 4 2000

Fickbohm Farm Site

Luton, Iowa

Based on the factors outlined below, I have determined a threat exists to the public health or welfare or the environment at this site/incident. An imminent and substantial endangerment to the public health or welfare or the environment exists because of an actual or threatened release of a hazardous substance at or from the incident.

I. SITE INFORMATION

Site Name: Fickbohm Farm Site
Site Number: A760
CERCLIS ID:
Site Location: Luton, Iowa
Potentially Responsible Party: Unknown
Access: _____ Restricted _____ Unrestricted xxx

NPL Status: This site is not on or is anticipated to be on the NPL

Category of Removal: Time-Critical

II. THREAT TO THE PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT

A. Site Background

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SUPR/Thomas/Jackson/Rabenau/08/04/00

Action Memo 2/Fickbohm Farm

ER&R
Thomas

MT
4/28/00

ER&R
Jackson

8-11

ER&R
Singletary

8/7/00

ER&R
Crossland

8/7/00

U.S. ENVIRONMENTAL PROTECTION AGENCY
SITE PROGRESS REPORT

I. HEADING

Date: October 3, 2000

From: Mark J. Thomas, On-Scene Coordinator
U.S. EPA, Region 7

To: Larry Zaragoza, Director (5203G)
Regions 5/7 Accelerated Response Center

Subject: Fickbohm Farm Site
Lawton, Iowa

Report: 1st

II BACKGROUND

Site No.:
Delivery Order No.: 0007
Response Authority: CERCLA, 104(a)
ERNS No.:
CERCLIS No.:
NPL Status: Not Nationally Significant
State Notification: IDNR notified
Action Memorandum Status: Signed August 4, 2000
Start Date: September 29, 2000
Demobilization Date:
Completion Date:

III. SITE INFORMATION

A. Incident Category

The site consist of dumped/abandoned pesticides in an old agricultural structure on the Fickbohm Farm

B. Site Description

1. Site Location

The Fickbohm Farm site is located in rural western Iowa approximately 2 miles north and 2 miles west of the town of Lawton. The address for the site is 1718 140th Street, Lawton, Iowa.

2. Description of Threat

Attention to the Fickbohm Farm site came through a phone call from a member of the Woodbury County, Iowa local emergency planning committee (LEPC), Gary Brown. Mr. Brown indicated that a horse had died after being stabled in an old barn on the Fickbohm Farm. A cursory investigation of the site indicated that a white crystalline compound was present in the barn. Subsequent laboratory analysis of the compound by the property owner indicated that the compound was 13 percent aldrin. The origin of the aldrin is unknown but was probably placed in the barn by a previous owner. Upon discovery that the material was aldrin, the owner promptly containerized any visible product, secured the product in trash sacks and is currently storing the material in a lock garage.

The death of the horse occurred during a pending sale of the property. Mr. John Belhist, the current owner, has agreed to access to the property for sampling and disposal of contaminated soil.

C. Removal Site Evaluation

Preparation of an Imminent and Substantial Endangerment document was initiated based on data and information provided by the Woodbury County LEPC. Discussions with the current owner indicated that the structure containing the contaminate is in an advanced state of disrepair. Failure to respond to the contamination may have resulted in additional exposure to livestock and humans.

The Woodbury County LEPC indicated that an autopsy conducted on the horse showed high levels of an organophosphorus compound. Additional investigation by the county indicated that the material was aldrin.

IV. RESPONSE INFORMATION

A. Situation

1. Current Situation

EPA responded to site with the general plan to recover the abandoned pesticide and remove soils if necessary. A preliminary survey of the area indicated that the aldrin was dumped into an old manger within the structure approximately 20 to 40 years ago. Over the

years, some of the material had migrated onto the barn floor and into the surrounding wood. A discussion with the current owner indicated that once the area is cleaned, the barn will be removed and disposed.

2. Removal Activities to Date.

On September 29, 2000, the Environmental Protection Agency (EPA) conducted a removal action at the Fickbohm Farm site consisting of containerizing of the manger and contents and the removal of approximately 0.5 of soil. All removed materials were stored onsite pending disposal.

3. Enforcement

The individual suspected of dumping/abandoning the pesticide is no longer an owner of the property. The recent owners had no knowledge of this material and only discovered the abandoned product after the death of the horse.

B. Next Steps

Completion of the site is pending sampling results collected from within the barn.

C. Key Issues

None

V. COST INFORMATION

Cost information is being processed at this time.

cc: Dennis Grams, P.E., RGAD
Craig Beasley, (5203G)
Michael J. Sanderson, SUPR
Bob Jackson, ER&R
Mark Thomas, ER&R
Teri Hankins, SDDD

Andrea Jirka, SDDD
Jim Donley, FEMA
CDR Jeffrey S. Hammond, USCG
Hattie Thomas, OEP
Lynette Motley, EFLR
Robert F. Stewart, DOI



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

AUG 4 2000

FINDING OF IMMINENT AND SUBSTANTIAL ENDANGERMENT

Fickbohm Farm Site

Luton, Iowa

Based on the factors outlined below, I have determined a threat exists to the public health or welfare or the environment at this site/incident. An imminent and substantial endangerment to the public health or welfare or the environment exists because of an actual or threatened release of a hazardous substance at or from the incident.

I. SITE INFORMATION

| | |
|--|-------------------------|
| Site Name: | Fickbohm Farm Site |
| Site Number: | A760 |
| CERCLIS ID: | IAN000703735 |
| Site Location: | Luton, Iowa |
| Potentially Responsible Party: | Unknown |
| Access: <input type="checkbox"/> Restricted <input type="checkbox"/> | Unrestricted <u>xxx</u> |

NPL Status: This site is not on or is anticipated to be on the NPL

Category of Removal: Time-Critical

II. THREAT TO THE PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT

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C. Nature of Actual or Threatened Release of Hazardous

Aldrin, discovered at the Fickbohm Farm site, is a banned pesticide and is known to be toxic and hazardous. The material is currently being stored in a locked garage. It is probable additional material remains in the barn and will warrant additional sampling and excavation. In the event of a fire or other mishap, release of material from the barn will occur.

Check applicable factors (from 40 CFR 300.415) which were considered in determining the appropriateness of a removal action:

XX 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)].

XX 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 [300.415(b)(2)(iv)].

XX Weather conditions that may cause hazardous substances or pollutants to migrate or to be released [300.415(b)(2)(v)].

XX 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)].

XX Other situations or factors that may pose threats to the public health or welfare or the environment.

III. SELECTED REMOVAL ACTION

The selected removal action will include sampling the barn floor and mangers for additional product identification. If additional material is discovered, soil and/or the barn structure will be removed and containerized. All waste will be shipped off site to a disposal site. Pending disposal, all waste product will be stored in a secure location.

Due to a time factor, sampling will be conducted by ER&R personnel. Laboratory services will be procured by the removal contractor from a local source. This will permit rapid return of analytical data.

IV. ESTIMATED COSTS


Extramural Costs

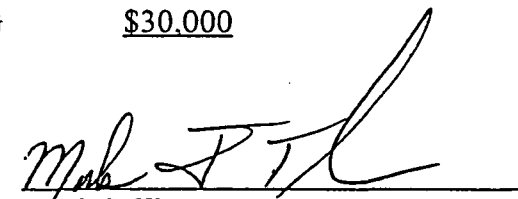
| | |
|----------------------------------|--------------|
| Regional Removal Allowance Costs | \$24,000 |
| Other Extramural Costs | <u>1,000</u> |
| Subtotal, Extramural Costs | \$25,000 |

| | |
|-------------------------|----------|
| <u>Intramural Costs</u> | \$ 5,000 |
|-------------------------|----------|

| | |
|--------------------------------|-----------------|
| TOTAL, REMOVAL PROJECT CEILING | <u>\$30,000</u> |
|--------------------------------|-----------------|

Approvals:


Robert W. Jackson, Chief
Emergency Response & Removal Branch


Mark J. Thomas
On-Scene Coordinator

4 / August / 2000
Date