



REGION 7

LENEXA, KS 66219

ACTION MEMORANDUM

SUBJECT: Request for an Emergency Removal Action at the Toastmaster Clarence Site Pursuant to the On-Scene Coordinator's delegated authority under CERCLA Section 104.

FROM: John Frey, On-Scene Coordinator
Response, Removal, and Oil Planning Section

THRU: Danny O'Connor, Supervisor
Response, Removal, and Oil Planning Section

TO: Adam Ruiz, Manager
Assessment, Emergency Response, and Removal Branch

I. PURPOSE

The purpose of this Action Memorandum is to document the decision to initiate response actions described herein for the former Toastmaster Clarence Site located at 211 Old Highway 36 Clarence, Missouri, pursuant to the On-Scene Coordinator's (OSC) delegated authority under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104. The primary objective of this emergency Removal Action is to address elevated levels of chlorinated solvents detected in indoor air at the site.

II. SITE INFORMATION

A. Site Description

Site Name:	Toastmaster Clarence
Superfund Site ID (SSID):	B7N7
CERCLA Number:	MON000721041
Site Location:	Clarence, MO
Lat./Long.:	39.742116, -92.258635
NPL Status:	Non-NPL
Removal Category:	Emergency
Nationally Significant:	No

B. Site Background

1. Removal Site Evaluation

A Phase I and II Targeted Brownfield Assessment at the former Maytag Facility was conducted by the Missouri Department of Natural Resources (MoDNR) contractor in July of 2006 to identify environmental conditions at the property. The assessment concluded that Volatile Organic Compounds (VOC), including trichloroethene (TCE), were detected in the groundwater, but that TCE was the only constituent above the Missouri Risk-Based Corrective Action default target levels. The assessment recommended the developers to clean up the spills from previous manufacturing uses of TCE.

A Phase I Environmental Site Assessment was conducted in 2019 by a private consulting firm. The Phase I assessment concluded that further investigation was warranted based on the information collected.

On June 17, 2022, MoDNR referred the site to EPA for assessment of chlorinated solvent releases at the site. In July 2023, as part of a Removal Site Evaluation, the EPA conducted a sampling event in July 2023 to investigate soil-gas and groundwater along the perimeter of the former Toastmaster Clarence facility. As a result of the sampling, the EPA found elevated levels of TCE and TCE degradation products within 50 feet of nearby residences.

During the week of December 4, 2023, the EPA conducted indoor air and sub-slab gas sampling in homes and businesses near the former Toastmaster Clarence Facility. As a result of the sampling, the EPA found one residence with indoor air samples containing levels of TCE above the Removal Management Level (RML). TCE detections were reported in sub-slab and crawl space samples, confirming a complete exposure pathway and a subsurface source. Additional vapor intrusion sampling is planned in the residential neighborhood near the facility.

2. Physical location and Site characteristics

The former Toastmaster Clarence site is located at 211 Old Highway 36 in Clarence, Missouri. It operated as a manufacturing facility of small fans from the 1950s to the early 2000s, with use of TCE as a degreasing solvent. Show Me Alternatives Manufacturing currently occupies the site.

The EPA has conducted an environmental justice (EJ) review of the community where the Site is located using EJScreen, EPA's EJ mapping and screening tool. EJScreen provides a nationally consistent dataset and approach for combining environmental and demographic indicators. The EPA uses EJScreen to evaluate a community where a Superfund site is located to determine whether additional consideration, analysis, or outreach is appropriate, as determined by the Site team, as EPA plans for, and conducts,

response actions in the community. According to the EJSscreen, the data do not indicate potential EJ concerns for the area.

3. Release or threatened release into the environment of a hazardous substance, or pollutant, or contaminant

One residence located near the former Toastmaster Clarence site has elevated levels of TCE in both the crawlspace and indoor air. TCE is a hazardous substance as defined in CERCLA Section 101(14), 42 U.S.C. § 9601(14), and as designated in 40 CFR § 302.4. TCE has been detected above RMLs in indoor air at a residence.

III. THREATS TO PUBLIC HEALTH, WELFARE OR THE ENVIRONMENT

A. Nature of Actual or Threatened Release of Hazardous Substances or Pollutants or Contaminants

TCE was used at the former Toastmaster Clarence site from 1950 until early 2000s. TCE has been detected in crawlspace and indoor air samples collected from a residence near the former Toastmaster Clarence site at concentrations exceeding the RML. Sub-slab soil gas samples have also detected TCE at the residence, indicating the presence of a sub-surface source.

B. Check Applicable Factors (from 40 CFR 300.415) Which Were Considered in Determining the Appropriateness of a Removal Action:

- ☒ 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)].
- ☐ 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 largely at or near the surface that may migrate [300.415(b)(2)(iv)].
- ☐ Weather conditions that may cause hazardous substances or pollutants to migrate or to be released [300.415(b)(2)(v)].
- ☐ 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)].
- ☐ Other situations or factors that may pose threats to the public health or welfare of the United States or the environment [300.415(b)(2)(viii)].

IV. SELECTED REMOVAL ACTION AND ESTIMATED COSTS

A. Situation and Removal Activities to Date

1. Current situation

Sampling conducted by the EPA in July 2023, documented the release of TCE into the environment. Indoor air, crawlspace, and sub-slab soil gas samples collected the week of December 4, 2023, from one residence reported exceedances of applicable RMLs. These results indicate a complete exposure pathway. Sample results were communicated to affected property owners and tenants during the week of January 1. Site team meetings were held to develop a path forward to address the RML exceedances. Sampling of additional residential properties is planned and may result in more properties requiring mitigation.

2. Enforcement

An Enforcement Addendum will be prepared to accompany this Action Memorandum as soon as possible once the EPA is able to gather more information regarding potential liable and viable parties associated with the Site. The former Toastmaster Clarence site ceased operations in the early 2000s. The site is currently owned and occupied by Show Me Alternatives Manufacturing.

B. Planned Removal Actions

1. Proposed action description

The removal action will include the mitigation of chlorinated solvents detected in indoor air above applicable RMLs and where there's a confirmed subsurface source. Mitigation may include temporary placement of air-purifying units followed by fixed system installations. Following installation, confirmation sampling will be conducted to confirm the systems are functioning properly.

2. Contribution to remedial performance

The proposed actions will, to the extent practicable, contribute to the efficient performance of any long-term remedial action at the site.

3. Applicable or relevant and appropriate requirements (ARARs)

Removal actions conducted under CERCLA are required to attain ARARs to the extent practicable. Any identified potential ARARs will be evaluated and complied with to the extent practicable. In determining whether compliance with ARARs is practicable, the OSC will consider appropriate factors, including the urgency of the situation and the scope of the removal action to be conducted.

4. Project schedule

The response was initiated on January 5, 2024, and will be complete once it has been confirmed by laboratory data that the installed technology or mitigation systems are functioning properly

C. Estimated Costs*

Contractor Costs (ERRS/START staff, travel, equipment)	\$50,000
Other Extramural Costs (Strike Team, other Federal Agencies)	\$0
Contingency Costs (20% of subtotal)	\$10,000
Total Removal Project Ceiling	\$60,000

*** The EPA direct and indirect costs, although cost recoverable, do not count toward the removal ceiling for this removal action. Liable parties may be held financially responsible for costs incurred by the EPA as set forth in Section 107 or CERCLA.**

V. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

A delay in action or no action at this site would increase the actual or potential threats to the public health and/or the environment.

VI. OUTSTANDING POLICY ISSUES

None.

VII. APPROVALS

This decision document represents the selected removal action for this site, developed in accordance with CERCLA as amended, and not inconsistent with the National Contingency Plan (NCP). This decision is based on the administrative record for the site.

Conditions at the site meet the NCP section 300.415(b) criteria for a removal action and through this document, I am approving the proposed removal actions. The total project ceiling is \$60,000. This amount will be funded from the regional removal Advice of Allowance.

John Frey, Federal On-Scene Coordinator
Response, Removal, and Oil Planning Section

VIII. ENDANGERMENT DETERMINATION UNDER CERCLA SECTION 106: HAZARDOUS SUBSTANCES

Pursuant to Section 106 of CERCLA, I have determined that there may be imminent and substantial endangerment to the public health or welfare or the environment because of an actual or threatened release of a hazardous substance from the site.

Adam Ruiz, Manager
Assessment, Emergency Response and Removal Branch



EJScreen Community Report

This report provides environmental and socioeconomic information for user-defined areas, and combines that data into environmental justice and supplemental indexes.

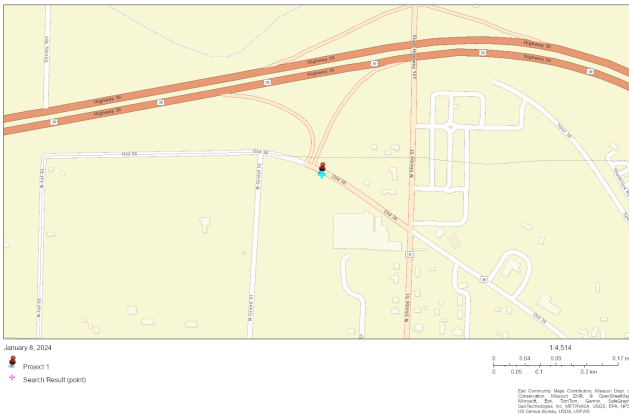
Clarence, MO

1 mile Ring Centered at 39.749954,-92.260416

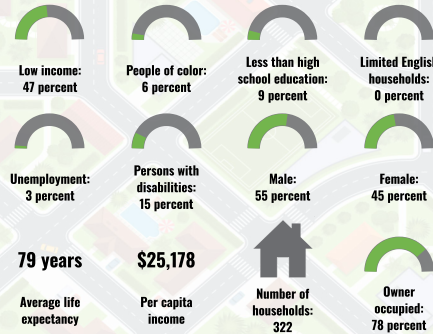
Population: 819

Area in square miles: 3.14

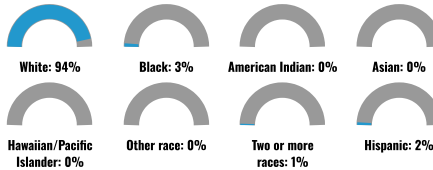
A3 Landscape



COMMUNITY INFORMATION



BREAKDOWN BY RACE



BREAKDOWN BY AGE



LIMITED ENGLISH SPEAKING BREAKDOWN



LANGUAGES SPOKEN AT HOME

LANGUAGE	PERCENT
No language data available.	

Notes: Numbers may not sum to totals due to rounding. Hispanic population can be of any race. Source: U.S. Census Bureau, American Community Survey (ACS) 2017-2021. Life expectancy data comes from the Centers for Disease Control.

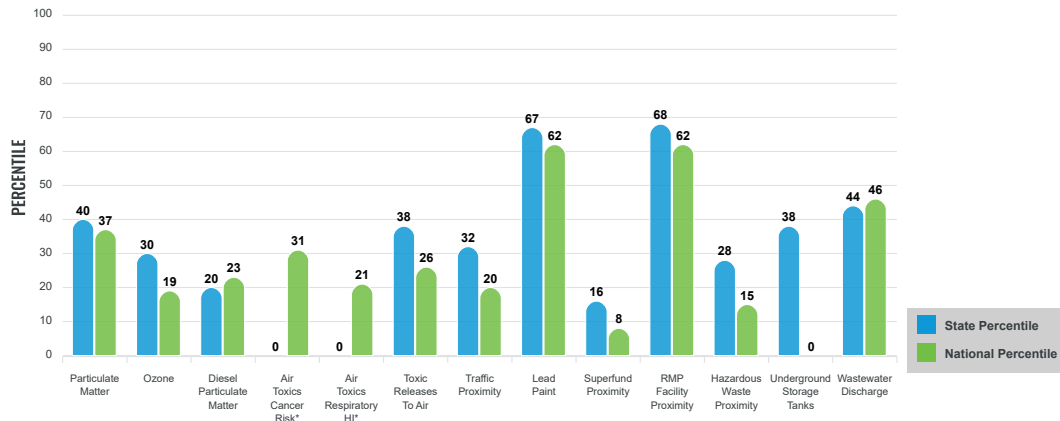
Environmental Justice & Supplemental Indexes

The environmental justice and supplemental indexes are a combination of environmental and socioeconomic information. There are thirteen EJ indexes and supplemental indexes in EJScreen reflecting the 13 environmental indicators. The indexes for a selected area are compared to those for all other locations in the state or nation. For more information and calculation details on the EJ and supplemental indexes, please visit the [EJScreen website](#).

EJ INDEXES

The EJ indexes help users screen for potential EJ concerns. To do this, the EJ index combines data on low income and people of color populations with a single environmental indicator.

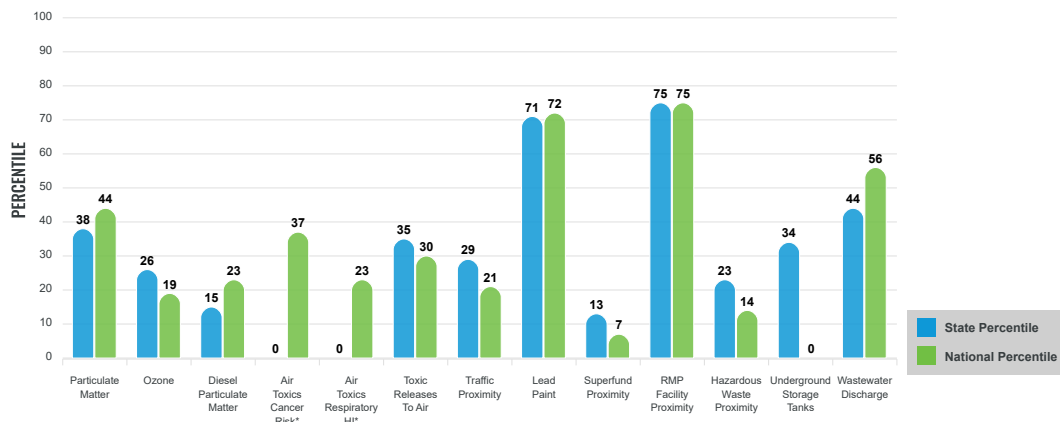
EJ INDEXES FOR THE SELECTED LOCATION



SUPPLEMENTAL INDEXES

The supplemental indexes offer a different perspective on community-level vulnerability. They combine data on percent low-income, percent linguistically isolated, percent less than high school education, percent unemployed, and low life expectancy with a single environmental indicator.

SUPPLEMENTAL INDEXES FOR THE SELECTED LOCATION



These percentiles provide perspective on how the selected block group or buffer area compares to the entire state or nation.

Report for 1 mile Ring Centered at 39.749954,-92.260416

EJScreen Environmental and Socioeconomic Indicators Data

SELECTED VARIABLES	VALUE	STATE AVERAGE	PERCENTILE IN STATE	USA AVERAGE	PERCENTILE IN USA
POLLUTION AND SOURCES					
Particulate Matter ($\mu\text{g}/\text{m}^3$)	7.44	8.05	25	8.08	30
Ozone (ppb)	56.2	59.9	19	61.6	13
Diesel Particulate Matter ($\mu\text{g}/\text{m}^3$)	0.0975	0.268	11	0.261	15
Air Toxics Cancer Risk* (lifetime risk per million)	20	25	0	25	5
Air Toxics Respiratory HI*	0.2	0.31	0	0.31	4
Toxic Releases to Air	64	4,500	22	4,600	19
Traffic Proximity (daily traffic count/distance to road)	6	110	19	210	12
Lead Paint (% Pre-1960 Housing)	0.37	0.31	64	0.3	63
Superfund Proximity (site count/km distance)	0.012	0.097	11	0.13	6
RMP Facility Proximity (facility count/km distance)	0.34	0.45	65	0.43	69
Hazardous Waste Proximity (facility count/km distance)	0.049	1.3	16	1.9	9
Underground Storage Tanks (count/km ²)	0.0072	2	22	3.9	0
Wastewater Discharge (toxicity-weighted concentration/m distance)	0.0004	0.49	31	22	41
SOCIOECONOMIC INDICATORS					
Demographic Index	26%	28%	58	35%	45
Supplemental Demographic Index	16%	14%	64	14%	64
People of Color	6%	23%	26	39%	14
Low Income	47%	33%	75	31%	78
Unemployment Rate	3%	5%	51	6%	43
Limited English Speaking Households	0%	1%	0	5%	0
Less Than High School Education	9%	10%	57	12%	55
Under Age 5	8%	6%	72	6%	74
Over Age 64	23%	18%	76	17%	77
Low Life Expectancy	19%	21%	30	20%	46

*Diesel particulate matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: <https://www.epa.gov/haqsa/air-toxics-data-update>

Sites reporting to EPA within defined area:

Superfund	0
Hazardous Waste, Treatment, Storage, and Disposal Facilities	0
Water Dischargers	6
Air Pollution	5
Brownfields	1
Toxic Release Inventory	1

Other community features within defined area:

Schools	0
Hospitals	0
Places of Worship	0

Other environmental data:

Air Non-attainment	No
Impaired Waters	No

Selected location contains American Indian Reservation Lands*	No
Selected location contains a "Justice40 (CEJST)" disadvantaged community	Yes
Selected location contains an EPA IRA disadvantaged community	Yes

Report for 1 mile Ring Centered at 39.749954,-92.260416

EJScreen Environmental and Socioeconomic Indicators Data

HEALTH INDICATORS

INDICATOR	HEALTH VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Low Life Expectancy	19%	21%	30	20%	46
Heart Disease	10.4	6.9	96	6.1	98
Asthma	9.9	9.9	58	10	52
Cancer	8.5	6.6	94	6.1	93
Persons with Disabilities	14.8%	15.1%	53	13.4%	64

CLIMATE INDICATORS

INDICATOR	HEALTH VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Flood Risk	13%	8%	84	12%	75
Wildfire Risk	0%	5%	0	14%	0

CRITICAL SERVICE GAPS

INDICATOR	HEALTH VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Broadband Internet	22%	16%	73	14%	79
Lack of Health Insurance	12%	10%	63	9%	75
Housing Burden	No	N/A	N/A	N/A	N/A
Transportation Access	Yes	N/A	N/A	N/A	N/A
Food Desert	No	N/A	N/A	N/A	N/A

Footnotes

Report for 1 mile Ring Centered at 39.749954,-92.260416