

FINAL DECISION
Browning-Ferris Industries Waste Systems of North America, Inc.
Missouri City, Missouri, Facility
ID No. MOD000624452

INTRODUCTION

The Missouri Department of Natural Resources (DNR) and the United States Environmental Protection Agency (EPA) are issuing this Final Decision, which identifies the selected final remedy for the Browning-Ferris Industries of North America (BFINA) landfill facility located in Missouri City, Missouri, and presents the concerns and issues raised during the public comment period. The public comment period for this remedy was from February 16, 2000, to April 1, 2000. No comments on the Statement of Basis were received by the EPA or the DNR during the comment period. Therefore, the remedy proposed in the Statement of Basis was not altered as a result of public comments.

SELECTED REMEDY

The selected remedy to address the contaminated media at the Missouri City facility is as follows:

- Continued maintenance of a multi component cap and operation of leachate collection systems;
- Continued operation of two groundwater interceptor trenches;
- Continued operation of an active gas collection and destruction system;
- Maintaining facility security, including fencing, onsite supervision, and acquisition of off-site property; and
- Providing for institutional controls, including deed and groundwater usage restrictions.

The cap system greatly reduces the potential for groundwater contact with the buried wastes and contaminated soils, reducing contaminant migration to underlying groundwater. The leachate and consolidation fluids collection systems are functioning as an effective collection and control mechanism to prevent migration of wastes and waste constituents into underlying groundwater. The groundwater interceptor trenches act as an effective barrier against the migration of hazardous wastes and hazardous waste constituents via groundwater. The active landfill gas extraction and destruction system has proved to be a reliable method to prevent the migration of and subsequent exposure to subsurface gas. The facility fencing and site security (as supplemented by the acquisition of adjoining property) provide a reliable and effective reduction in the risk

posed by the facility to human health and the environment. Institutional controls, including deed and groundwater usage restrictions will prevent future human exposure to site contaminants.

All of these components of the final remedy have been constructed, with most of them in operation for several years. Consequently, DNR and EPA have had sufficient opportunity to evaluate their performance. The existing corrective measures are proving to be largely effective. Remedial alternatives were evaluated in the Corrective Measures Study (CMS), using General Standards and several secondary factors (balancing criteria) as described in EPA's Corrective Action Plan (final), OSWER Directive 9902.3, May 1994. These General Standards and Decision Factors are listed below.

General Standards

- Overall Protection of Human Health and the Environment.
- Attain Media Cleanup Standards
- Control the Sources of Releases
- Comply with Standards for Management of Wastes

Decision Factors

- Long-Term Reliability and Effectiveness
- Reduction of Toxicity, Mobility or Volume of Wastes
- Short-Term Effectiveness
- Implementability
- Cost

DNR and EPA have determined that the selected remedy is protective of human health and the environment, controls the source(s) of releases, complies with applicable standards for waste management, and is expected to attain media-specific cleanup/protection standards for the facility. Evaluation of analytical results obtained from continued groundwater and surface water monitoring, combined with ongoing risk assessment calculations from these results, will ensure that this remedy protective by routinely quantifying any human health/environmental risks and acting as the trigger for further corrective action, including supplemental corrective measures, in the event that established risk levels are exceeded. ·

PUBLIC PARTICIPATION ACTIVITIES

The DNR and EPA solicited public comment from February 16, 2000, to April 1, 2000, on the proposed final remedy at the BFINA facility. No comments were received by either agency on the proposed remedy. The Agencies also provided the opportunity to request a hearing on the remedy during the public comment period, but none was requested.

FUTURE ACTIONS

The DNR will oversee future implementation of the ongoing corrective action activities at the BFINA facility under a RCRA post-closure permit. The instrument under which the corrective action has thus far been carried out, EPA's 1988 Administrative Order on Consent (Docket No. VI I-88-H-0024), will be terminated shortly after the post-closure permit becomes effective.

DECLARATIONS

The United States Environmental Protection Agency has determined that the corrective action being taken at the BFINA facility is appropriate and will be protective of human health and the environment.

[Original signed by William A. Spratlin]

9/29/00

William A. Spratlin, Director
Air, RCRA, and Toxics Division, Region 7

Date