



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

SEP 23 2011

Mr. Ken Taylor
SC Dept. of Health & Environmental Control
2600 Bull Street
Columbia, SC 29201

Dear Mr. Taylor:

We are pleased to provide a copy of the Action Memorandum for the US Finishing/Cone Mills Site located in Greenville, Greenville County, South Carolina. If you have any questions or comments concerning this document, please contact the On-Scene Coordinator at the following address:

Leo Francendese
U.S. Environmental Protection Agency
ERRB
61 Forsyth Street
Atlanta, Georgia 30303

Sincerely,

A handwritten signature in black ink, appearing to read "ASH", with a large, stylized flourish extending to the left.

A. Shane Hitchcock, Chief
Emergency Response & Removal Branch

Enclosure

cc: Debbie Jourdan
Dawn Taylor
Jim McGuire
Leo Francendese
Timothy Neal
Kerri Sanders



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

SEP 1 2011

ACTION MEMORANDUM

SUBJECT: Request Ceiling Increase, Exemption from the Twelve-Month Statutory Limit and \$2 Million Exemption for Time-Critical Removal Action at the US Finishing/Cone Mills Site, Greenville, Greenville County, South Carolina

FROM: Leo Francendese, On-Scene Coordinator
Emergency Response and Removal Branch

TO: Franklin E. Hill, Director
Superfund Division

THRU: Shane Hitchcock, Chief *ASH*
Emergency Response and Removal Branch

Site ID: A4DD

I. PURPOSE

The purpose of this Action Memorandum is to request additional funding and an emergency exemption from both the twelve-month and \$2,000,000 statutory limit for a removal action at the US Finishing/Cone Mills Site (Site) located in Greenville, Greenville County, South Carolina. The Site continues to pose a threat to public health and the environment that meets the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) section 300.415(b) criteria for removal actions. Site activities were commenced under the attached Emergency Action Memorandum signed August 18, 2011. A ceiling increase is needed in order to continue activities at the Site and to further mitigate the threats to human health, welfare and the environment. If approved, this ceiling increase will bring the total project ceiling to \$3,872,000 of which \$3,020,000 will be funded through the Regional Removal Allowance.

II. SITE CONDITIONS AND BACKGROUND INFORMATION

CERCLIS ID: SCD003358744
Removal Category: Time-Critical Removal Action

A. Site Description

1. Removal Site Evaluation

The Site was referred to the U.S. Environmental Protection Agency Region 4 Emergency Response and Removal Branch (ERRB) by the Region 4 Remedial Program for a Removal Site Evaluation (RSE) on May 20, 2011, as part of EPA's Integrated Cleanup Initiative (ICI). The Site was proposed for the National Priorities List on March 11, 2011.

The initial phase of the RSE encompassed the review of 30 years of data and actions taken and production of a comprehensive database with visual representation that will enable users (as appropriate) to query the complete database for specific needs during the future remedial investigation (RI) and/or removal action.

The On-Scene Coordinator (OSC) conducted a Removal Site Inspection (RSI) with the Remedial Project Manager (RPM) and representatives of the EPA Technical Services Section (TSS), the Agency for Toxic Substances and Disease Registry (ATSDR) and the Superfund Technical Assessment and Response Team (START) on August 9, 2011. On August 9, 2011, START collected surface water samples from three locations at the aeration lagoon, one location at the reservoir, and one location at the wastewater treatment plant. Paint chip samples were collected from inside the water treatment station building and from inside the main plant building. Abandoned drums and small containers were noted during the RSI, as well as the dilapidated condition of the fire damaged facility. Extensive amounts of asbestos were observed in the fire damaged portion of the facility.

The OSC initiated an emergency removal action at the Site on August 9, 2011 to secure the Site via fencing and signage as well as contain and ultimately dispose of abandoned drums and small containers.

The RSE recommends that further action be taken by the Removal Program to address the risk presented by an ongoing release or threat of release of asbestos to the environment.

2. Physical Location

The former US Finishing/Cone Mills Site is located at 3555 Old Buncombe Road, approximately 3 miles north of downtown Greenville, South Carolina. The central portion of the facility is situated at 34° 52' 59.852" North latitude and 82° 25' 34.69" West longitude. The property is roughly shaped like a 'V' and is approximately bounded by the Reedy River to the west and by Langston Creek and Highway 253 to the east. Within the 'V' exists a residential neighborhood that was formerly mill worker housing. Two reservoirs utilized by the facility are located to the north (the former Northern Reservoir) and northwest of the residential area (the former Northwestern Reservoir). Lakeview Middle School is adjacent to the former Northern Reservoir.

3. Site Characteristics

The facility was constructed in 1903 as a textile bleaching and finishing facility and was operational until November 2003 when the main plant was partially destroyed by fire. The main portion of the facility lies east of the Reedy River and west of Langston Creek, approximately three miles north of downtown Greenville, Greenville County, South Carolina. The property on which the main facility is located is bordered to the east by Highway 253, to the west by a residential neighborhood originally constructed to house Union Bleachery employees, to the north by Old Buncombe Road, and to the south (across the Reedy River) by a residential neighborhood. Two reservoirs utilized by the facility during the operational period are located northeast of Buncombe Road (the former Northern Reservoir) and northwest of the residential area (the Northwestern Reservoir). The former Northern Reservoir is bordered to the northwest and southeast by residential property, to the northeast by woodlands and to the west by Old Buncombe Road. Lakeview Middle School is located directly across Old Buncombe Road from the former Northern Reservoir.

The main portion of the 259-acre facility property is comprised of three main buildings:

- an approximately 400,000 square feet (ft²) industrial building that includes a basement and two floors partially destroyed by a 2003 fire;
- a warehouse, referred to as the Grey Warehouse; and
- the former groundwater remediation plant.

The facility property also contains 10 smaller, ancillary buildings. The main facility property is fenced; however, the fence has not been maintained and evidence of unrestricted access has been observed.

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

A fire destroyed much of the facility in 2003. Based on both RSI observation and historical analytical data, the remaining fire related debris and dilapidated fire damaged structures contain substantial amounts of friable asbestos that provide a source of continuous release or threat of release to the environment.

Asbestos is a hazardous substance as defined in the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) 101 (14).

5. NPL Status

This Site has been proposed for listing on the NPL and is expected to be finalized for listing in late 2011.

6. Maps, pictures and other graphical representations

Maps, pictures and other graphics are available upon request.

B. Other Actions to Date

The Site was referred to the EPA Removal Program by the Region 4 Remedial Program for a Removal Site Evaluation on May 20, 2011. Historical information pertaining to the above Site can be found at http://www.epaossc.org/site/site_profile.aspx?site_id=6944 in the documents section as well as a database viewer at <http://www.usfinishing-conemills.com/>. The following is a brief history within the context of past business development, ownership and environmental enforcement.

In 1890, the brothers Moses and Caesar Cone formed the Cone Export & Commission Company of Greensboro, North Carolina with offices at 61 Worth St. New York City, New York. Among the Greensboro group of mills founded by the Cone Brothers was the White Oak Mills. Construction of the facility began in 1903 and was completed in 1905.

Operational details from 1903 through 1957 were not available to the OSC although it is known that the White Oak Mill (facility) was expanded on several occasions. In 1947, it was sold to the Aspinook Corporation and, in 1957, to the Cone Mills Corporation (Cone Mills). Cone Mills operated the facility until 1984 under the name Union Bleachery. American Fast Print, Ltd. (AFP) purchased the facility in May 1984 and operated it until November 2003 under the name US Finishing when the main plant was partially destroyed by fire. AFP is the current property owner of a large portion of the facility. In July 2004, Piper Properties purchased approximately 19 acres along the Reedy River from Cone Mills. The facility property is currently in temporary receivership.

The White Oak Mills is the subject of the Remedial Program's referral and is referred to in this document as the 259-acre US Finishing/Cone Mills Site (or Site).

The following description is a chronological summary of environmental enforcement:

- In November 1980, Cone Mills submitted a Hazardous Waste Permit Application.
- In 1981, Cone Mills submitted a Notification of Hazardous Waste Site to EPA Region 4.
- From 1981 thru 1984, investigations required under South Carolina Department of Health and Environmental Control (SCDHEC) oversight documented chromium contamination in Langston Creek and in groundwater beneath the main facility plant. SCDHEC entered into a Consent Decree with Cone Mills and AFP. The Consent Decree required continued recovery and treatment of contaminated groundwater.
- In December 1985, SCDHEC completed a Preliminary Assessment (PA) for the Site documenting chromium in groundwater.
- AFP conducted a Remedial Investigation (RI) from August 1990 to June 1991. Extensive contamination (metals and organics) was documented in groundwater and in sludge pits, the aeration lagoon, the Reedy River floodplain dump, and the main plant's basement and within chromium and caustic storage areas.
- In June 1993, the SCDHEC Site Screening Section completed a Site Investigation (SI) for the Site. The Site was assigned a medium priority under CERCLA. Enforcement strategy focused on the potentially responsible parties (PRP) conducting remediation efforts.

- As part of a 1993 Settlement Agreement, Cone Mills conducted contaminated soils removal between 1993 and 1999 of approximately:
 - 3,500 tons of hydrocarbons affected soil
 - 7,000 tons of chromium affected soil and
 - 3,000 tons of caustic affected soil.
- A fire in November 2003 destroyed much of the main facility. Fifteen to 25 million gallons of fire suppression water containing unknown constituents from the facility was released to Langston Creek and the Reedy River.
- Due to an impending bankruptcy, Cone Mills removed the groundwater recovery and treatment system from operation in June 2004, after 20 years of operation. In 2004, SCDHEC completed an Expanded Site Inspection (ESI) for the Site. Based on the elevated metals findings of the ESI, the facility was given a high priority for further action.
- Removal activities were performed at the facility between October and December 2004, by contractors for AFP (US Finishing). Soil removal activities were conducted at:
 - SW corner of main plant
 - Sediments from the maintenance shop
 - Soils adjacent to an elevated railroad bed
 - Brine pit contents
 - Former water treatment basin contents
- In April 2005, SCDHEC conducted site assessment activities to further evaluate the potential threat to human health and the environment.
- In June 2005, SCDHEC conducted an ESI Update sampling event.
- AFP, Duke Energy Corporation, and Piper Properties of Greenville, Limited Liability Corporation (Piper Properties entered into a settlement agreement with SCDHEC in November 2006. Duke Energy conducted removal of PCB contaminated sources.
- In May 2008, SCDHEC petitioned the court to appoint a temporary receiver for property owned by AFP. SCDHEC petitioned the court to appoint a temporary receiver for Piper Properties in April 2009.
- In March 2011, the EPA proposed the Site for the NPL on the strength of the surface migration pathway.
- In May 2011, the EPA's Remedial Program referred the Site to the Removal Program for an RSE and is part of the Agency's Integrated Cleanup Initiative (ICI).

C. State and Local Authorities' Roles

1. State and local actions to date

The previous section provides a timeline of actions taken by the State and local authorities dating back to 1980. SCDHEC petitioned the court to appoint a temporary receiver for the property in 2009. In 2011, the State supported the proposed listing of the Site on the NPL.

2. Potential for continued State/local response

The SCDHEC has indicated that it does not currently have sufficient funds to conduct necessary response measures in a time-critical manner. EPA will continue to coordinate activities with SCDHEC.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR TO THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

The OSC initiated an emergency response under his delegated warrant authority on August 9, 2011, to secure the release or threatened release from abandoned drums and containers, which were suspected to contain hazardous substances (chloroanilines, unknown solids in a swollen drum and waste oils), as well as secure the Site to discourage unauthorized public access. Substantial amounts of asbestos containing material are visible in the fire damaged facility. The facility has been posted by the local authorities as a “structure unsafe for human occupancy or use.” Despite the posting, significant evidence of trespasser activity is present at the Site.

Section 300.415 of the NCP lists the factors to be considered in determining the appropriateness of a removal action. Paragraphs (b)(2)(i),(iii),(v), and (vii) directly apply to the Site:

300.415(b)(2)(i): Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants.

The 2003 fire caused the collapse of a large section of the roof of the main plant building. This damage resulted in a significant portion of the building being totally open to the environment. Large debris piles in this portion of the collapsed building contain visible evidence of asbestos. In addition, asbestos containing materials exist throughout the remainder of the dilapidated structure. Visible evidence suggests that trespassers have/are actively scavenging the building. Such trespassers run the risk of being exposed to hazardous substances and/or carry out activities (e.g. demolition) that could lead to off-site migration of hazardous substances. The fence is in disrepair despite the local authorities posting that the “structure is unsafe for human occupancy or use.”

300.415(b)(2)(iii): Hazardous substances/pollutants/contaminants in containers which may pose a threat.

Various abandoned drums and containers suspected of containing hazardous substances (chloroanilines, unknown solids in a swollen drum and waste oils) were identified as part of the RSI.

300.415(b)(2)(v): Weather conditions may cause hazardous substance or pollutants/contaminants to migrate or be released.

The facility is in a significant state of structural decline. A combination of structural failures (collapse) and wind dispersion have the likely potential to release asbestos into the environment. In addition, it is likely that significant storm events provide a threat of surface water migration of debris containing hazardous substances.

300.415 (b)(2)(vii): The availability of other appropriate Federal or State response mechanisms to respond to the release.

At this time, there are no federal or state government mechanisms that are able to respond to this incident in a timely manner and with the resources needed to assume the cleanup.

IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances and/or pollutants from this Site, if not addressed by implementing the response action selected in this Action Memorandum, may present an imminent and substantial endangerment to public health welfare, or the environment.

V. EXEMPTION FROM STATUTORY LIMITS

A. Emergency Exemption

1. There is an immediate risk to public health or welfare at the Site.

The condition of the Site continues to present an imminent and substantial risk to public health. Significant debris piles from the fire along with a high percent level friable asbestos present within the dilapidated structure continues to present a release of hazardous substance to the environment and a threat to the public health. The following table is a preliminary evaluation of the debris categories. Due to the unstable nature of the damaged structures, it is very likely that the structures in question will have to be completely demolished as part of the execution of this removal action.

The following image and tables provide a summary of areas that are expected to be demolished, potential waste streams and volume estimates, and potential on-site disposal locations:

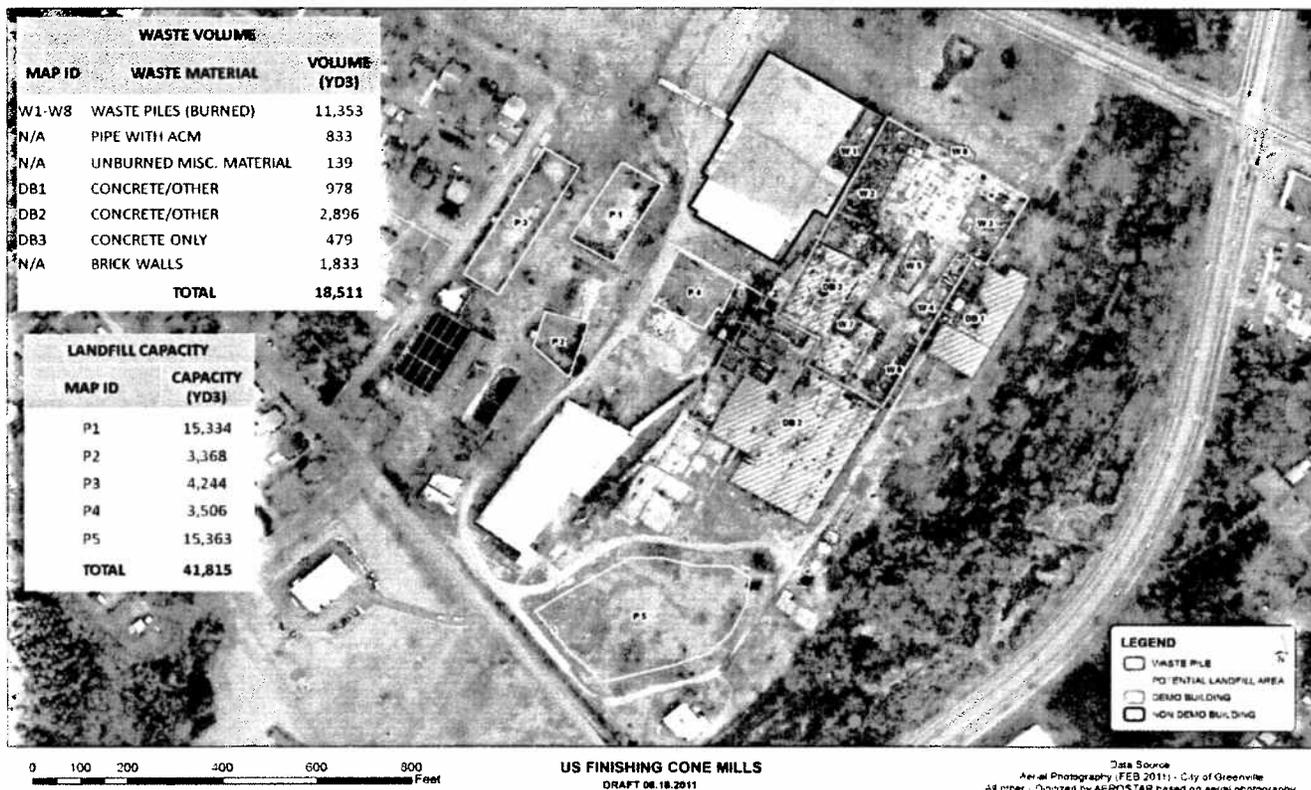


Table 1. Waste Stream Summary

MATERIAL	LOCATION COMMENT	USE NOTES	QTY	HEIGHT/ LENGTH/ WIDTH (FT)	DIAMETER (FT)	AREA (FT ²)	VOLUME (FT ³)	VOLUME (YD ³)
MATERIAL	BURNED/EXPOSED DEBRIS W/ ACM	SEE SAMPLE RESULTS (WC-002, -003, -005)	8	6		51,087	306,525	11,353
WASTE PILES ^A	VARIOUS		500	30	0.3	4,500	22,500	833
PIPE WITH ACM ^B	LARGE FABRIC ROLLS/ PLASTIC ROLLS /WOOD		50	3	5	750	3,750	139
OTHER UNBURNED, NONHAZ. MATERIAL ^C	DB3, COLLAPSED BLDG. CENTER WEST PORTION OF SITE	LBP MAY BE PRESENT ^G	1	0.3		43,083	12,925	479
BLDG. DB3 CONCRETE ^D	DB1, EAST SIDE OF SITE	LBP MAY BE PRESENT ^G	1	0.6		22,000	26,400	978
BLDG. DB1 CONCRETE/ OTHER ^E	DB2, CENTER SOUTH SIDE OF SITE	LBP MAY BE PRESENT ^G	1	0.6		65,152	78,182	2,895
BLDG. DB2 CONCRETE/ OTHER ^E	BRICK WALLS PARTIAL COLLAPSED	LBP MAY BE PRESENT (SEE SAMPLE RESULTS WC-001, -004)		30	1,100	33,000	49,500	1,833
TOTAL								18,511
NOTES:	A- WASTE PILE HEIGHT BASED ON AVERAGE HEIGHT MEASURED, SQUARE FOOTAGE BASED ON GIS DATA. VOLUME CALCULATED IS AN ESTIMATE ONLY.							
	B- ACM DESIGNATION BASED ON RSE DATA.							
	C- ESTIMATED QUANTITY, VOLUME IS ESTIMATE ONLY							
	D- SQUARE FOOTAGE TAKEN FROM GIS DATA. VOLUME BASED ON CONCRETE ONLY.							
	E- SQUARE FOOTAGE TAKEN FROM GIS DATA. VOLUME IS ESTIMATE ONLY.							
	F- LENGTH TAKEN FROM GIS DATA. HEIGHT IS ESTIMATE, VOLUME IS ESTIMATE ONLY.							
	G- LBP- LEAD BASED PAINT. RESULTS OF PAINT CHIP SAMPLES PENDING.							

Table 2. Volume Estimates

AREA ID	LOCATION COMMENT	USE NOTES	HEIGHT OR DEPTH (FT) ^A	AREA (FT ²)	CAPACITY/VOLUME (FT ³)	CAPACITY/VOLUME (YD ³)	USABLE % ^B	USABLE CAPACITY/VOLUME (YD ³)
P1	NORTH WW TREAT PIT (WEST OF MAIN BUILDING)	LARGE, DEEP, LIMITED ACCESS (WEST SIDE)	20	20,701	414,020	15,334	50%	7,667
P2	SOUTH WW TREAT PIT	DEEP, LIMITED ACCESS	8	11,368	90,944	3,368	75%	2,526
P3	FRMR UST CONTAINMENT	LARGE, BERMED, LIMITED ACCESS	6	19,096	114,576	4,244	90%	3,819
P4	CONCRETE AREA, CENTER SITE	SMALLER AREA, PARTIAL ACCESS	5	18,934	94,670	3,506	90%	3,156
P5	OPEN AREA SOUTH SITE	GOOD ACCESS, LOWER ELEVATION, ROAD SURROUNDS	5	82,958	414,790	15,363	90%	13,826
TOTAL					41,815		30,994	
NOTES	A- DEPTH OF PITS AND HEIGHT OF POTENTIAL LANDFILL LOCATIONS BASED ON ESTIMATES. OTHER MEASUREMENTS BASED ON GIS DATA OF SITE.							
	B- USABLE AREA BASED ON ASSUMPTIONS OF ACCESSIBILITY.							

- Continued response actions are immediately required to prevent, limit, or mitigate an emergency.

The debris pile contains friable asbestos that is uncontrolled and exposed to the weather. The fence was repaired as part of the emergency response action, but it is noted that significant trespassing has occurred at numerous locations in the previous fence. This is the case, despite local signage warning that the structures are not safe for human occupancy or use. Continued response actions to remove and contain the contamination are immediately required to mitigate this emergency.

Additional risk is presented by the unstable nature of the structure which can collapse and further distribute asbestos as well the structures current exposure to wind and rain and its likely paths of migration.

- Assistance will not otherwise be provided on a timely basis.

As stated in Section III, there are currently no state or local government mechanisms that are able to respond to this incident with the resources needed to perform the necessary removal actions.

VI. RESPONSE ACTIONS AND ESTIMATE COSTS

A. Response Actions

1. Action description

During the initial emergency response on August 9, 2011, abandoned drums and containers were secured, the perimeter fence was repaired, and additional signage was installed to minimize risks at the Site. The RSE recommendation is to execute the removal friable asbestos remaining within the damaged section of the facility. It is likely that complete demolition of portions of the overall structure will be required in order to safely perform the work. The OSC has been coordinating with the remedial program and the state during the scoping of this action and it is the expectation that an interim storage area will be constructed onsite for this material.

The requested additional funding outlined in this Action Memorandum will support operations to demolish the remaining asbestos containing structures on the Site and on-site containment of the asbestos waste. The new scope of work will include the following actions:

- Demolish the remaining structures identified with containing friable asbestos and consolidate the debris on-site;
- Consolidation of remaining friable asbestos in a pre-designated landfill area as well as the appropriate handling and possible landfilling of the other wastestreams generated;
- Continue air monitoring measures and decontamination protocols necessary on all asbestos abatements;
- Continue to provide Site security during non-working hours;
- Continue to coordinate all site removal activities with state and local officials and other EPA programs (remedial program); and
- Refer the Site control back to the remedial program following completion of the response and removal action.

2. Contribution to remedial performance

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

3. Engineering Evaluation and Cost Analysis (EE/CA)

This removal action is time-critical and does not require an EE/CA.

4. Applicable or Relevant Appropriate Requirements (ARARs)

On-site removal actions conducted under CERCLA are required to attain ARARs to the extent practicable, considering the exigencies of the situation. Off-Site removal activities need only comply with all applicable federal and state laws, unless there is an emergency. This cleanup is being conducted as a removal action.

A letter to the State of South Carolina requesting identification of State ARARs will be sent immediately following approval of this Action Memorandum. The OSC will continue to coordinate with State officials to identify State ARARs and will evaluate such ARARs in accordance with the NCP.

All waste transferred off-site will comply with the CERCLA Off-Site Rule (40 CFR 300.440).

5. Project Schedule

The removal action began on August 9, 2011, with the initiation of an emergency response under the OSC's warrant authority. Foregoing unexpected delays, all construction-based actions are expected to be complete between six months to one year of the date of approval of this Action Memorandum. Additional time will likely be required beyond one year for transition from removal lead to remedial lead concerning database management. The estimate is given in order to account for unaccounted difficulties in demolition and separation execution as well as determining suitable on-site landfill locations and construction specifications.

B. Estimated Costs

Extramural Costs:	Current Ceiling	Proposed Increase	Proposed Ceiling
Regional Allowance Costs:			
ERRS	20,000	3,000,000	3,020,000
Non-Regional Allowance Costs:			
START	75,000	175,000	250,000
USCG Strike Team		100,000	100,000
EPA ERT		100,000	100,000
DOI BOR		50,000	50,000
Subtotal, Extramural Costs:	95,000	3,425,000	3,520,000
10% Contingency:	9,500	342,500	352,000
TOTAL EXTRAMURAL COSTS:	104,500	3,767,500	3,872,000
TOTAL SITE CEILING:	104,500	3,767,500	3,872,000

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

Actual or threatened releases of hazardous substances from this Site, if not addressed by the response action selected in this Action Memorandum, present an imminent and substantial endangerment to public health, welfare, or the environment.

VIII. OUTSTANDING POLICY ISSUES

While this response does not set a precedent, it is considered nationally significant based on EPA's policy regarding CERCLA actions at asbestos sites. Headquarters concurrence with this Action Memorandum is attached.

This Site has also been identified by EPA Region 4 as a Site that is functionally operating under the Agency's Integrated Cleanup Initiative.

IX. ENFORCEMENT

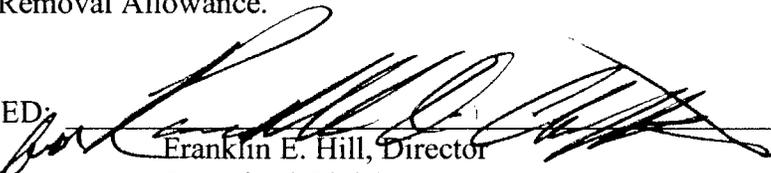
Enforcement activities have been initiated and are ongoing. Please see the attached Enforcement Addendum (Enforcement Sensitive) for further information regarding enforcement activities.

The total EPA costs for this removal action based on full-cost accounting practices that will be eligible for cost recovery are estimated to be \$3,872,000 using the following formula: (Total Extramural Costs + Total Intramural Costs) + (45.26% x (Total Extramural Costs + Total Intramural Costs)) or (\$3,872,000) + (45.26% x (\$3,872,000)) = \$5,624,467.¹

X. RECOMMENDATION

This decision document represents the selected removal action for the US Finishing/Cone Mills Site in Greenville, Greenville County, South Carolina developed in accordance with CERCLA as amended, and not inconsistent with the NCP. This decision is based on the Administrative Record for the Site.

Conditions at the Site continue to meet the NCP Section 300.415(b) criteria for a removal and the CERCLA Section 104(c) emergency exemption from the \$2 million and twelve-month limitation. I recommend your approval for the proposed action to allow continued removal response. The total project ceiling, if approved, will be \$3,872,000 of which an estimated \$3,020,000 comes from the Regional Removal Allowance.

APPROVED:  Date: 9/1/11
Franklin E. Hill, Director
Superfund Division

DISAPPROVED: _____ Date: _____
Franklin E. Hill, Director
Superfund Division

- Attachments:
- Removal Site Inspection/Emergency Response Letter Report
 - Removal Site Evaluation Recommendations Memo
 - Emergency Response Action Memorandum (August 18, 2011 Initial POLREP)
 - Enforcement Addendum

¹ Direct costs include direct extramural costs and direct intramural costs. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of site-specific direct costs, consistent with the full cost accounting methodology effective October 2, 2000. These estimates do not include pre-judgment interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual total costs from this estimate will affect the United States' right to cost recovery.