

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

SEP 27 2011

**SUBJECT:** Request for Funding for a Removal Action at the  
Lower Darby Creek Area Superfund Site – Clearview Landfill Site  
Darby Township, Delaware County, Pennsylvania

**FROM:** Michael Towle, On-Scene Coordinator  
Eastern Response Branch (3HS31)

Josh Barber, Remedial Project Manager  
Eastern PA Branch (3HS21)

**TO:** Dennis P. Carney, Associate Director  
Office of Preparedness and Response (3HS30)

**I. ISSUE**

The purpose of this Action Memorandum is to request funding to initiate a Time-Critical Removal Action at the Lower Darby Creek Area Superfund Site – Clearview Landfill Site (Site). The Removal Action specifically addresses threats posed by a portion of the Site referred to as the Southern Industrial Area (SIA) in which high concentrations of polychlorinated biphenyls (PCBs) and polycyclic aromatic hydrocarbons (PAHs) are located (a map depicting the approximate location of the SIA is included as Attachment A). The SIA is located primarily within Darby Township, Delaware County, Pennsylvania. However, a portion of the SIA and much of the overall Site is located within the limits of the City of Philadelphia, Pennsylvania. The contaminated area poses an immediate threat to human health and environment. The Site is listed on the National Priorities List (NPL).

Sampling conducted by the Environmental Protection Agency (EPA) as part of the Remedial Investigation (RI) of the Site indicated the presence of numerous contaminants, including PCBs and PAHs in various media on and within the Site as well as in Darby Creek and Cobbs Creek which flow alongside the Site. A Removal Site Evaluation conducted by the On-Scene Coordinator (OSC) and the Remedial Project Manager (RPM) pursuant to Section 300.410 of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 C.F.R. § 300.410, revealed a release and threatened release of hazardous substances, primarily PCBs and PAHs, from the Site into the environment. Although the Removal Site Evaluation considered analytical data from throughout the Site, based upon a review of that data the OSC and RPM are proposing removal activities only in the SIA at this time. PCBs and PAHs are two classes of organic compounds that can bioaccumulate in fatty tissue and pose a threat to environmental (e.g., fish) and human receptors through ingestion and other exposure pathways. Fishing advisories for Darby and Cobbs Creek have been established by the Commonwealth of Pennsylvania as a result

of potential PCBs concentrations in fish.

Based upon information obtained from the Removal Site Evaluation (RSE), and upon consideration of the factors in Section 300.415(b)(2) of the NCP, the OSC has determined that a Removal Action, pursuant to Section 104(a) of the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA), 42 U.S.C. § 9604(a), is appropriate and necessary to mitigate threats posed by the release and threatened release of hazardous substances from the Site. The OSC's evaluation of Site conditions indicates that actions including both removal and stabilization of soil contaminated by PCBs and PAHs are required to mitigate the release and threatened release of hazardous substances from the Site. A Removal Action Project Ceiling of \$1,311,184, of which \$1,095,793 are from the Regional Removal Allowance, is necessary to mitigate the threats identified in this Action Memorandum.

## **II. BACKGROUND AND SITE CONDITIONS**

### **A. Site Description**

The Lower Darby Creek Area Superfund Site – Clearview Landfill Site is located along the eastern bank of both Darby Creek and Cobbs Creek, near 83<sup>rd</sup> Street and Buist Avenue. The Site includes the Clearview Landfill, the Eastwick Recreation Park (a/k/a “City Park”) east of the Clearview Landfill, and a portion of the Eastwick neighborhood (a residential area). The Clearview Landfill footprint is primarily within Darby Township, Delaware County, PA, but partially within the limits of the City of Philadelphia. Limited areal contamination and/or landfill debris is expected in the subsurface beneath the City Park and potentially a small portion of the Eastwick neighborhood. According to available information, landfill activities occurred in the Darby and Philadelphia portion of the Site. During the mid-1970s when development began on the Eastwick neighborhood, a considerable amount of waste was excavated and moved from the Philadelphia portion of the Site to the Delaware County portion. Excavated materials were moved from the Philadelphia portion of the Site, placed, graded and partially covered with fill.

The Clearview Landfill was privately owned and operated without a permit from the 1950s to the 1970s by the Clearview Land Development Corporation, and used for the disposal of municipal and industrial waste collected from the City of Philadelphia and portions of Delaware County. There was no documentation of an engineered cover or functioning run-on/runoff control system installed at Clearview Landfill. In addition, there were no records of the types and volume of waste materials accepted at the landfill during operation.

Several businesses are being operated at the southern end of Clearview Landfill in the area referred to as the southern industrial area (SIA). Aside from the previous landfill operations, current and/or previous business operations on the SIA include a trash hauling business, white-goods (appliances) recycling operation, drum storing and recycling, auto repair and salvage, and truck/equipment storing and snow plowing operation. Additional ad-hoc businesses also exist on-site. Evidence of dumping is also present at the Site. The Site includes several structures used by the current businesses entities operating upon the Site. Numerous vehicles, abandoned heavy equipment, scrap metal, and other construction debris is also located upon the Site.

The SIA has been identified as having areas of significant soil contamination, in both the

surface and subsurface. During sampling activities conducted by the Environmental Protection Agency (EPA) (i.e., Remedial Investigation (RI)), a transformer carcass was found to be overturned and leaking oil in the northeastern portion of the SIA. Oily wastes and strong petroleum odors were also encountered during subsurface sampling as part of the RI as well as during subsequent sampling as part of the RSE. The most prominent contaminants are PCBs, PAHs and, to a lesser degree, metals, pesticides, and dioxins. PCBs, PAHs and other contaminants have migrated from the soils within the SIA into the surrounding environments, e.g., a low-lying wooded area east of the SIA and along the Darby Creek. This low-lying area receives much of the surface water runoff from the SIA and is located over a historic stream channel that has since been filled in as a result of landfill activities. The historic creek channel flowed towards and discharged into Darby Creek. Significant concentrations of PAHs have been detected in Darby Creek; PCBs have also been detected to a limited extent. Fish tissue samples from Darby Creek have indicated the presence of elevated levels of PCBs as well as PAHs, dioxins and other contaminants found on the Site.

Benzo(a)pyrene (B(a)P) is the primary risk driver among the detected PAH compounds within the SIA. Significant concentrations of B(a)P and other PAHs have been detected in the sediment of Darby Creek immediately adjacent to and downstream of the Clearview landfill. Maximum concentrations of B(a)P in creek sediment were detected immediately downstream of the Site at a level of 1.1 ppm. The highest total PAH sediment concentration was also found to be just downstream of the landfill in Darby Creek with a concentration of 14.2 ppm.

Although fishing advisories exist for both Darby and Cobbs Creek, the creeks are frequently accessed for recreational purposes, including fishing and turtle trapping. The EPA Remedial Project Manager (RPM) for the Site has witnessed recreational boat traffic and fishermen utilizing the Creek in the area of the Site. The Site and surrounding area serve as habitat for a variety of fauna; migratory waterfowl, anadromous fish and resident ducks, geese, and fish have been observed in the area of the Site. The Site is adjacent to the northern boundary of the John Heinz National Wildlife Refuge (NWR); a location on the migration route that is part of the Atlantic Flyway and the largest tidal freshwater marsh in Pennsylvania.

## **B. Quantities and Types of Substances Present**

Sampling and analysis of soil at the Site has been conducted by the EPA as part of the RI for the Site as well as to support a RSE. Several hazardous substances have been identified in the surface and subsurface soils, sediment and groundwater. PCBs and PAHs are the primary contaminants of concern and the OSC and RPM believe that the actions proposed herein will address the majority of the threats in the SIA posed by hazardous substances by focusing on the PCBs. Maximum surface (0 to 6 inches) concentrations of PCBs within the SIA are 280 parts per million (ppm or mg/kg). Subsurface (6 inches to 9 feet) soil concentrations of PCBs within the SIA exceed 2,100 mg/kg. The highest subsurface detection of B(a)P in the SIA was 16 mg/kg and was from the same sample which resulted in the highest PCB detection (the total PAH concentration at this location was 325 mg/kg). High detections of PAHs (up to 27 mg/kg total PAHs), have also been observed in the wooded low-lying area into which the SIA drains. PCBs and many PAHs, including benzo(a)pyrene, are hazardous substances within the meaning of CERCLA and are listed as such under 40 CFR Part 302.

The total volume of PCB-contaminated soil is unknown. An estimated 540 cubic yards of soil may be contaminated at levels above 50 mg/kg.

### **C. National Priorities List Status**

The Site was listed on the CERCLA National Priorities List (NPL) on June 14, 2001. Removal actions at this Site will not impede any future remedial actions and are coordinated between the OSC and the RPM.

### **D. State and Local Authorities' Roles**

The Site is currently an EPA-lead NPL Site. The OSC and RPM are coordinating activities associated with the assessment and evaluation of the Site with the Pennsylvania Department of Environmental Protection (PADEP). Local authorities have no current role at the Site other than to grant access. The OSC and RPM will continue to coordinate proposed removal actions with State and Local authorities.

## **III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT**

In addition to the obvious contamination of the surface soil to which human receptors may be exposed (discussed below), Site sampling and analytical results indicate that the environment and habitat of ecological receptors (Creek sediment) is threatened by PCBs and PAHs at levels that bioaccumulate in aquatic organisms and pose a threat to humans ingesting contaminated fish and/or turtles. Currently, Darby and Cobbs Creeks are included under a fish advisory issued by the Commonwealth of Pennsylvania due to the potential concentrations of PCBs in fish. As part of an aquatic risk assessment being conducted by EPA for the Lower Darby Creek Area Superfund Site, fish collection and tissue testing were conducted in 2010. Results of the sampling indicate consistent levels of PCBs in fish tissue at concentrations that exceed human and/or ecological screening levels. Nevertheless, the RPM has witnessed fishing in the area of the Site. Additionally, birds and other aquatic predators gather fish from the area of the Site as well as the John Heinz NWR.

Promulgated federal or State criteria for sediment contamination levels intended for the protection of aquatic organisms (and subsequent human receptors) do not exist. To determine if threats are posed to ecological receptors, EPA instead relies upon a comparison between site-specific contaminant levels and "screening guideline" levels developed from contaminant- and organism-specific toxicity testing. The "screening guideline" levels identify benchmark sediment contaminant levels at which toxicity testing has established a likelihood of adverse biological effects to exposed aquatic organisms. EPA Region 3 uses a concentration of 0.0598 mg/kg as a screening guideline for PCBs, and 0.19 mg/kg for high molecular weight PAHs for aquatic receptors in freshwater sediment. Exceedance of these screening levels will likely result in adverse effects to aquatic organisms.

Hazardous substances released at and from the Site may bioaccumulate in the food chain. Bioaccumulation poses a threat to migratory birds, upper trophic predatory species, and to human receptors ingesting aquatic organisms such as fish, turtles, shellfish, and/or crustaceans in the contaminated environment. Actions to prevent further release of hazardous substances from the

Site will ensure that risks to the food chain posed by bioaccumulation are reduced.

Section 300.415 of the NCP, 40 C.F.R. § 300.415, identifies factors to be considered in determining the appropriateness of a removal action. Paragraphs (b) (2) (i), (ii), (iv), (vii), and (viii) apply to the need for response at the Clearview Landfill Site as follows.

**§ 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;”**

PCBs are present in the surface (280 mg/kg) and subsurface (2,100 mg/kg) soils at the Site. The most common PCB Aroclor mixture associated with the Site is Aroclor 1260. According to EPA, PCB Aroclor 1260 concentrations in excess of approximately 74 mg/kg in the soil of properties subject to industrial use may pose unacceptable cancer risk (e.g., greater than  $1 \times 10^{-4}$  excess cancer risk) to exposed receptors. The surface soil is exposed and accessible to workers and other persons accessing the Site.

Contaminated sediment in the Creek is available for use as habitat to aquatic organisms and other wildlife which use the tidal sediment areas, e.g., mudflats, of Darby and Cobbs Creek as well as the John Heinz NWR. For example, numerous migratory birds such as herons use the mudflat for fishing and feeding purposes at low tide. These are submerged during high tides and serve as aquatic habitat for numerous fish and other species. PCB- and PAH-contaminated Creek sediment is thus potential habitat for a variety of ecological receptors, such as fish, shellfish and birds. PCBs and PAHs can bioaccumulate in exposed organisms. Data recently collected by EPA indicate that accumulation of PCBs and other contaminants is currently occurring, resulting in elevated levels of PCBs in the tissue of fish from Darby and Cobbs Creek. As stated above, the Site and surrounding area, including the John Heinz NWR, serve as critical habitat for migratory waterfowl (herons, geese, and ducks), fish and other aquatic receptors. Fishermen and turtle trappers have also been observed in boats and along the banks of the two creeks. Due to the potential for increased consumption of PCBs by humans, the Commonwealth of Pennsylvania has posted a fishing advisory for the consumption of fish extracted from the creeks surrounding the Site. PCBs now present in the environment of both Darby and Cobbs Creeks have entered the food chain; humans (fishermen) are a part of the Darby and Cobbs Creek food chain.

**§ 300.415 (b)(2)(ii) “Actual or potential contamination of drinking water supplies or sensitive ecosystems;”**

Contaminated sediments have been identified in tidal mudflat/wetland areas which are habitat to a wide variety of aquatic and terrestrial organisms including migratory birds and anadromous fish, despite the industrialization of much of the surrounding area. Tidally exposed contaminated sediment provides ground for feeding birds such as herons and ducks. The submerged sediment provides habitat for bottom feeding fish and other lower trophic species; all of which are known to be present in the creeks adjacent to the Site. Furthermore, several known state-listed rare or protected animal and plant species are known to exist in the vicinity and within the John Heinz NWR, which is adjacent to the Site. Because suitable habitat may be scarce in this industrialized area of southeastern Pennsylvania, any available habitat is critical and widely utilized flora and fauna. The contamination of the sediment in the available habitat and the

presence of contamination concentration in the SIA portion of the Clearview Landfill greatly increase the potential for PCBs and PAHs to enter into the food chain.

**§ 300.415 (b)(2)(iv) "High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface, that may migrate;"**

The results from the EPA RI sampling at the Site indicate that high levels of PCBs are present in the surface and shallow subsurface soils within the SIA portion of the Clearview Landfill. The Site is located within the 100 year floodplain and flooding is common in this area. There are substantial portions of the Site which lack a sufficient cover or vegetation to prevent erosion. Even minor precipitation events have been observed to create sufficient surface water flow and erosion through the SIA toward a wooded lowland area and Darby Creek. As the severity of rain events increases, so does the likelihood that the high levels of PCB contamination in the surface soils are migrating and that contaminants in the shallow subsurface soils will be exposed. Steep terrain on portions of the Site greatly increases the chances of this occurring.

**§ 300.415 (b)(2)(vii) "The availability of other appropriate federal or state response mechanisms to respond to the release;"**

The Site is an NPL Site for which EPA is designated lead responsibility for response actions.

**§ 300.415 (b)(2)(viii) "Other situations or factors that may pose threats to public health or welfare of the United States or the environment;"**

The Site is located on Darby and Cobbs Creek, both of which are tidally influenced. The combination of tide surges and storm events may act to erode the bank of the Site and deposit or erode sediment from the area of the Site. An erosional event may cause the migration of contamination soil directly into the environment of Darby or Cobbs Creek, increasing the existing public health threat posed by ingestion of organisms from the Creek which are contaminated with PCBs.

#### **IV. ENDANGERMENT DETERMINATION**

Actual or threatened releases of hazardous substances from this Site, if not addressed by implementing the response actions outlined in this funding request, may present an imminent and substantial endangerment to the public health, welfare, or the environment.

#### **V. PROPOSED ACTIONS AND COSTS**

The actions proposed in this Funding Request are intended to remove high concentrations of hazardous substances and minimize the further migration of high concentration PCBs and PAHs into the environment. In addition to posing a threat to human receptors via incidental ingestion and inhalation of surface soil, these hazardous substances which exist immediately adjacent to the Darby Creek and threaten to release into the Creek, pose a potential threat to

aquatic receptors. The Action will not result in the complete removal of hazardous substances from the Site. Instead, the response action focuses on high concentrations of PCBs and PAHs which are exposed at the surface and/or are present in the shallow subsurface soil and may further migrate into the environment. Post Removal Site Controls are not required at this time since the Site is still undergoing EPA investigation and remedy selection activities under the NPL process. The Removal Action specifically addresses threats posed by a portion of the Site referred to as the Southern Industrial Area (SIA) in which high concentrations of polychlorinated biphenyls (PCBs) and polycyclic aromatic hydrocarbons (PAHs) are located, as proposed below (a map depicting the approximate location of the SIA is included as Attachment A).

#### **A. Proposed Actions**

1. Mobilize/demobilize personnel and equipment.
2. Implement facilities and measures (e.g., installing roads and fencing) to facilitate and control access and provide security to facilitate efficient performance of the Removal Action and minimize exposure to hazardous substances during the response action.
3. Implement erosion and sedimentation control features (e.g., silt fencing and vegetative cover) to minimize migration of PCBs contamination from the SIA area during implementation of the Removal Action.
4. Implement storm water management controls during the removal action which minimize the migration of storm water into the area subject to response activity and prevent the migration of potentially PCB-contaminated storm water; actions may include construction of berms or trenches and pumping and temporary containment of potentially PCB-contaminated storm water.
5. Treat, waters which may be accumulated during activities and discharge such waters to local sewage treatment plant. Or, if this arrangement is not feasible, dispose waters off-Site in accordance with CERCLA 121(d)(3) and 40 C.F.R. 300.440 and 40 C.F.R. 761.61.
6. Prepare and maintain temporary storage for hazardous substances generated during the Removal Action.
7. Excavate and remove soil contaminated with PCBs such that PCBs concentration in soil is less than 100 mg/kg. Excavation depth shall be limited to the depth of ground water, shall not compromise the stability of any structure, and shall not extend deeper than 8 feet.
8. Cover all areas in which PCB contamination in the soil is not removed pursuant to Item #7 and is above 100 mg/kg with a cap/cover meeting the requirements of 40 C.F.R. 761.61 and construct in order to promote drainage away from the PCB-contaminated soil that remains.

9. Excavate and remove remaining soil contaminated with PCBs such that PCBs concentration in surface soil (0 to 6 inches) is less than 25mg/kg.
10. Grade and cover remaining soil contaminated with PCBs greater than 10 mg/kg in a manner which minimizes the migration of PCBs toward Darby Creek.
11. Dispose off-site the hazardous substances (e.g., PCB-contaminated soil) identified above, and other wastes associated with the Removal Action, in accordance with CERCLA 121(d)(3) and 40 C.F.R 300.440 and 40 C.F.R. 761.61. Activities may include sampling, bulking, consolidating, drumming, pumping, or otherwise handling the hazardous wastes, hazardous substances, liquids, and wastes to ensure that they are properly transported.
12. Backfill excavated areas and place fill material such that drainage is shed away from contaminated soil areas.
13. Remove access and security measures and backfill and restore ground disturbed by installation of access and security measures.

#### **B. Contribution to Remedial Performance**

The proposed Removal Action is not expected to be inconsistent with or hinder any Remedial Actions at the Site. The Remedial Action for the Clearview Landfill has not yet been selected.

#### **C. Compliance with ARARs**

The Removal Action will attain ARARs to the extent practicable given the exigencies of the situation. The following is a summary of the ARARs identified to date that may be applicable or relevant and appropriate to the Removal Action:

- Construction of an on-Site cover shall consider the requirements of 40 C.F.R. 761.61(a)(7) to the extent practical considering the exigencies of the situation.
- The Clean Water Act – Ambient Water Quality Criteria (AWQC) (40 C.F.R. Part 131) are non-enforceable guidelines developed for carcinogenic and non-carcinogenic compounds for the protection of human health and aquatic life. AWQC may be used to assess need for remediation of discharges to surface water.
- Pennsylvania Water Quality Standards (25 PA Code, Chapter 93) are surface water quality standards promulgated for protection of human health and aquatic life. These may be used to assess need for remediation of discharges to surface water.
- Clean Water Act Effluent Limitations for Point Source Discharge (40 C.F.R. Part 122) establishes National Pollutant Discharge Elimination System (NPDES) program requirements for discharge of treated water to a point source.

- Erosion Control Regulations (25 PA Code, Chapter 102) provides requirements for erosion and sedimentation control plans, permits, etc.
- Stormwater Management Act of 1978 (Act 167) requires the implementation of measures to control stormwater runoff.
- Federal Water Pollution Control Act (40 C.F.R. Part 116.3) is potentially applicable to any discharges at the site.
- National Archeological and Historic Preservation Act (132 C.F.R. 229) may be applicable if any prehistoric, historic, or archeological artifacts are encountered during site remediation.

The EPA RPM has requested that PADEP provide any potential ARARs by October 7, 2011.

#### **D. Estimated Costs**

The proposed distribution of funding is as follows:

Extramural Costs	Total
Regional Allowance Costs: (ERRS contractors and subcontractors)	\$ 1,095,793
Other Extramural Costs Not Funded from the Regional Allowance: START Contractor	\$ 215,391
<b>TOTAL REMOVAL ACTION PROJECT CEILING</b>	<b>\$ 1,311,184</b>

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

If no action is taken or the action is delayed, the threat of additional or potential release of hazardous substances from the Lower Darby Creek Area Superfund Site – Clearview Landfill into the environment is inevitable.

#### **VIII. OUTSTANDING POLICY ISSUES**

There are no outstanding policy issues pertaining to the Lower Darby Creek Area Superfund Site – Clearview Landfill Site.

#### **IX. ENFORCEMENT**

The EPA Region III Office of Enforcement has been provided with all background information available regarding this Removal Action to pursue enforcement actions pertaining to

the Lower Darby Creek Area Superfund Site – Clearview Landfill (See attached Confidential Enforcement Addendum).

The total EPA costs for this removal action based upon full-cost accounting practices that will be eligible for cost recovery are estimated to be \$

Direct Extramural Costs	\$ 1,311,184
Direct Intramural Costs	\$ 64,000
Total, Direct Costs	\$ 1,375,184
Indirect Costs (67.13 % x Direct Costs)	\$ 923,161
<b>Estimated EPA Costs for a Removal Action</b>	<b>\$ 2,298,345</b>

## X. RECOMMENDATION

This Action Memorandum decision document represents the recommended Removal Action for the Lower Darby Creek Area Superfund Site – Clearview Landfill Site in Philadelphia and Darby, Pennsylvania, developed in accordance with CERCLA as amended, and not inconsistent with the NCP. Conditions at the Site meet the NCP Section 300.415(b)(2) factors for a removal and I recommend your approval of the Removal Action. The total project ceiling will be \$ 1,311,184. Of this, an estimated \$ 1,095,793, comes from the Regional Removal Allowance.

### Action by the Approving Official:

This Action Memorandum represents the selected Removal Action for continuing the Removal Action at the Lower Darby Creek Area Superfund Site – Clearview Landfill Site, in Darby Township and the City of Philadelphia, Pennsylvania, developed in accordance with CERCLA as

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<sup>1</sup>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.

amended, and not inconsistent with the NCP. This decision is based on the administrative record for the Site.

Pursuant to Section 113(k) of CERCLA, 42 U.S.C. 9613(k) and EPA delegation No. 14-22, I hereby establish the documents identified in Attachment B hereto as the Administrative Record supporting the issuance of the Action Memorandum.

I have reviewed the above-stated facts and based upon those facts and the information compiled in the documents described above, I hereby determine that the release or threatened release of hazardous substances at and/or from the Site presents or may present an imminent and substantial endangerment to the public health or welfare or to the environment. I concur with the Removal Action at the Lower Darby Creek Area Superfund Site – Clearview Landfill Site as outlined in the Action Memorandum.

APPROVED: Dennis P. Carney  
Dennis Carney, Director  
Office of Preparedness and Response  
EPA Region 3

DATE: 9/27/11

Attachments:

- A. Enforcement Confidential Memo
- B. Administrative Record documents