



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2466

JAN 11 1995

Ref: 8HWM-ER

ACTION MEMORANDUM AMENDMENT

SUBJECT: Request for a Classic Emergency Removal Action 12-Month Exemption, Ceiling Increase, and Modification of the Proposed Action for the Aspen Park Solvents Site, at Aspen Park near Conifer, Jefferson County, Colorado.
ACTION MEMORANDUM AMENDMENT

FROM: Peter Stevenson, OSC
Emergency Response Branch

THRU: Cheryl Orisler, Chief
Response Section

John Giedt, Chief
Emergency Response Branch

TO: Robert L. Duprey, Director
Hazardous Waste Management Division

Category of Removal: Classic Emergency
Fund-Lead

Site ID#: 6D

I. PURPOSE

The purpose of this ACTION MEMORANDUM AMENDMENT is to request and document approval of a 12-month exemption, ceiling increase, and modification of the proposed action for the Removal Action described herein for the Aspen Park Solvents Site (Site) located in the Aspen Park/Conifer community in Jefferson County, Colorado.

This Removal Action at the Site, including the 12-month exemption, ceiling increase, and modification described herein, continues to satisfy the criteria for Removal Actions under Section 300.415 (b) (2) of the National Contingency Plan (NCP). This request meets the emergency criteria for exemption from the statutory limits on Removal Action and is necessary because the Environmental Protection Agency (EPA) needs to install treatment units to replace the bottled water, which is presently being furnished by EPA and provide maintenance and monitoring of the new treatment systems.



II. SITE CONDITIONS AND BACKGROUND

A. Site Description

Aspen Park is a community near Conifer, Colorado, which derives its drinking water from wells. The initial Removal Action (See attached Action Memorandum dated December 1, 1994) focused upon a plume of contamination which is spreading to wells within the community. Bottled water is being provided to residences with wells for which sampling demonstrated high levels of carbon tetrachloride (CCl₄) in the drinking water.

1. Removal site evaluation

A sampling of an Aspen Park Day Care Facility drinking water well by the Colorado Department of Health (CDH), in accordance with Colorado drinking water regulations for "non-transient non-community" systems, showed its well to contain CCl₄ in concentrations above the Maximum Contaminant Level (MCL). The Region VIII Environmental Protection Agency (EPA) began a Site Investigation (SI), requiring sampling of the wells surrounding the "subject well".

At the request of ERB and as a part of the SI, between September 24, 1994 and October 27, 1994, 115 wells were sampled. Twelve (12) wells showed >30 ppb CCl₄, ranging from 41 to 85,000 ppb CCl₄. On October 25, when the EPA Emergency Response Branch (ERB) was notified that verification samples from selected readings also contained high levels of CCl₄, a Removal Action, providing bottled water for drinking and cooking purposes was initiated, as defined in the attached Action Memorandum dated December 1, 1994: "In accordance with National Guidance for establishing Removal Action levels for contaminated drinking water sites, a site-specific level of 5 ppb has been developed, based on a detailed analysis of conditions at the site, by Regional toxicologists."

Concurrently, an investigation was begun to identify the source of the CCl₄ in the wells and identify any Potentially Responsible Parties.

Modification of the Removal Action, and a request for additional funding and time is now necessary to:

- a. Provide treatment units (based on a Treatability Study) instead of bottled water, to the residences with CCl₄ above the MCL.

- b. Provide monitoring and maintenance of the treatment units.

This change in scope will require an exemption to the 12 month time limit and additional funding of \$483,400, which will raise the total funding ceiling to \$533,400.

2. Physical location

Refer to the attached previous ACTION MEMORANDUM dated December 1, 1994.

3. Site characteristics

Refer to the attached previous ACTION MEMORANDUM dated December 1, 1994.

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

Refer to the attached previous ACTION MEMORANDUM dated December 1, 1994.

5. NPL status

This Site is not an NPL site, but Pre-NPL screening is in progress.

6. Maps, pictures, and other graphic representations

Refer to the attached previous ACTION MEMORANDUM dated December 1, 1994.

- B. Other Actions to Date

1. Previous actions

The previous actions have already been discussed within this request or are defined in the attached Action Memorandum dated December 1, 1994.

2. Current Actions

EPA is presently supplying bottled water to the residences with CCl_4 above the MCL.

C. State and Local Authorities' Roles

1. State and local actions to date

The discovery of the contamination within the water at the Site was a result of routine sampling reported to the State under the Safe Drinking Water Act. The Site was referred to the EPA Site Assessment Program for PA/SI work.

2. Potential for continued State/local response

Continued involvement by the State/local in this Removal Action is expected to be largely in the area of communication with the community and routine sampling. State and local funds are not available for this Removal.

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

A. Threats to Public Health or Welfare

Refer to the attached previous ACTION MEMORANDUM dated December 1, 1994.

B. Threats to the Environment

Refer to the attached previous ACTION MEMORANDUM dated December 1, 1994.

IV. ENDANGERMENT DETERMINATION

Refer to the attached previous ACTION MEMORANDUM dated December 1, 1994.

V. EXEMPTION FROM STATUTORY LIMITS

A. Emergency and Consistency Exemption:

1. Site conditions meet the criteria set forth in CERCLA §104(c)(1)(A) and §104(c)(1)(C). There is an immediate risk to public health or welfare and the environment, a need for an exemption from the 12 months limitation, and a need for continued response actions which are otherwise appropriate. The threats to public health or welfare and the environment that are prevalent on this Site are explained in more detail in the attached Action Memoranda dated December 1, 1994.

2. Continued response actions are immediately required to prevent, limit, or mitigate an emergency. A more permanent solution must be found for the residences with CCl_4 above the MCL. Bottled water does not address all avenues of exposure; most notably, exposure through inhalation as a result of washing clothes, cooking, etc., is not being checked. According to EPA toxicologists, a treatment system is necessary in order to eliminate the health threat to the affected residences.

If this request for a \$533,400 and 12-month exemption is not granted, children, as well as adults living at the Site, will continue to be exposed to potentially dangerous levels of CCl_4 via vapors.

3. Assistance from other government agencies is not anticipated on a timely basis because neither the State nor the County have the funds/capability to take any actions at the Site. Consequently, the timely completion of this Removal Action can only be accomplished if this Action Memorandum Exemption is approved.

VI. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed action description

Installation of Water Treatment Units

Install carbon absorption units or air strippers at each affected residence.

Monitoring and Maintenance

Carbon requires change-out and strippers require periodic maintenance.

2. Contribution to remedial performance

The proposed actions will not affect any future Remedial Actions and for the residences it may constitute most of the Remedial Action.

3. Description of alternative technologies

Alternative technologies that may apply to the actions described in this Action Memorandum Amendment relate to provision of treatment units rather than bottled water.

4. EE/CA

This is a Classic Emergency Removal Action; thus, an EE/CA is not required and will not be prepared.

5. Applicable or relevant and appropriate requirements (ARARs)

ARARs have been listed in the previous Action Memoranda and will be complied with to the extent practicable.

6. Project schedule

The projected order of work activities is as follows:

- a. Install water treatment units - (approx. \$260,000)
- b. Initiate maintenance and monitoring - (approx. \$62,000).

7. Estimated Costs

The December 1, 1994, Action Memorandum authorized a Project Ceiling of \$50,000 for the Removal Action. The requested Ceiling Increase for this Action Memorandum is \$483,400, bringing the total estimated Project Ceiling to \$533,400.

	<u>Previous Action</u>	<u>Proposed Action</u>	<u>Proposed New Project Ceiling</u>
<u>Extramural Costs:</u>			
ERCS Treatment/ Disposal Costs	\$ 20,000	\$322,000	\$342,000
TAT Costs	\$ 10,000	\$ 50,000	\$ 60,000
20% Contingency	\$ 6,000	\$ 74,400	\$ 80,400
TOTAL EXTRAMURAL	\$ 36,000	\$446,400	\$482,400
<u>Intramural Costs:</u>			
Direct Costs	\$ 4,500	\$ 12,000	\$ 16,500
Indirect Costs	\$ 9,500	\$ 25,000	\$ 34,500
TOTAL, INTRAMURAL	\$ 14,000	\$ 37,000	\$ 51,000
PROJECT CEILING	\$ 50,000	\$483,400	\$533,400

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

Refer to attached Action Memorandum dated December 1, 1994 for EPA's initial concerns. The water treatment units are necessary to provide a long-term solution until such time as the source of contamination can be determined.

VIII. OUTSTANDING POLICY ISSUES

None.

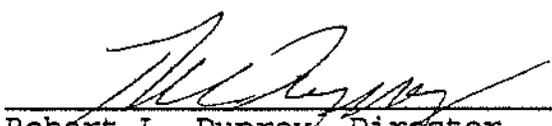
IX. ENFORCEMENT

See Attachment A of the Action Memorandum dated December 1, 1994, for a confidential summary of the enforcement status.

X. RECOMMENDATION

This decision document represents the selected Removal Action for the Aspen Park Solvents Site in Aspen Park near Conifer, Jefferson County, Colorado, developed in accordance with CERCLA as amended, and is not inconsistent with the NCP. This decision is based on the administrative record for the Site.

Conditions at the Site meet the NCP section 300.415(b)(2) criteria for a removal and the CERCLA Section 104(c)(1)(A) emergency exemption from the 12-month limitation, and I recommend your approval of the proposed modification of the Removal Action, 12-month Exemption, and the ceiling increase of \$483,400. The new total project ceiling, if approved, will be \$533,400. Of this, an estimated \$482,400 will come from the Regional removal allowance.

Approve:  Date: 1/11/95
Robert L. Duprey, Director
Hazardous Waste Management Division

Disapprove: _____ Date: _____
Robert L. Duprey, Director
Hazardous Waste Management Division

Attachments:
Action Memorandum dated December 1, 1994.