



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

930090

US EPA RECORDS CENTER REGION 5



495088

REPLY TO THE ATTENTION OF:

MEMORANDUM

SUBJECT: Request for Approval and Funding for a Time-Critical Removal Action at the Zizzo Properties Site, Kenosha, Kenosha County, Wisconsin (Site ID # C59U)

FROM: Brad Benning, OSC
Emergency Response Branch 2, Section 3

THRU: Samuel Borries, Chief
Emergency Response Branch 2

TO: Douglas Ballotti, Acting Director
Superfund Division

I. PURPOSE

The purpose of this Action Memorandum is to request and document your approval to expend up to \$ 1,950,724 to conduct a time-critical removal action at the Zizzo Properties Site (Site) located in Kenosha, Kenosha County, Wisconsin. The time-critical removal action proposed herein will mitigate the threats to public health, welfare, and the environment from unsecured auto shedder residue (ASR) containing elevated levels of lead and polychlorinated biphenyls (PCBs) above removal management levels (RML). No precedent-setting issues are associated with this non-NPL Site.

The Action Memorandum would serve as approval for EPA to expend, as the lead technical agency, resources to take actions described herein to abate the imminent and substantial endangerment posed by hazardous substances at the Site. EPA will conduct the removal of hazardous substances pursuant to Section 104(a)(1) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 USC § 9604(a)(1), and Section 300.415 of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 C.F.R. § 300.415.

II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID: WI N000506107
RCRA ID: N/A
State ID: DNR BRRTS No. 02-30-378495
Category: Time-Critical Removal Action

The Site has been utilized as a scrap yard by Zizzo Scrap Iron and Paper for over 30 years. Historically, the northern property has also been utilized as a coal yard and a junkyard. The southern property has also been utilized as a heating fuel supply company, motorcycle repair shop, and a city disposal company. Zizzo Scrap Iron operated an auto shredder where vehicles were loaded onto a conveyor ramp and loaded into the shredder. Non-metal portions of autos (fabric, cushioning, insulation, plastic, etc.) were ejected as "fluff" and steel was transported off-site and sold to steel manufacturers. Fluff was typically left on-site, either buried or left as waste piles along the perimeter of the property. The owner of the property is deceased and the property has been abandoned. Wisconsin Department of Natural Resources (WDNR) referred the Site to EPA due to the likely presence of contaminants such as heavy metals and PCBs.

A. Site Description

1. Removal site evaluation

On April 14, 2014, EPA On-Scene Coordinator (OSC) Bradley Benning, WDNR members, and Superfund Technical Assistance and Response Team (START) mobilized to the Site. Two buildings and a remnant conveyor tower are located on the Site. A red cinder block building is located in the northwest corner of the property. At the time of the site reconnaissance all of the building's doorways and windows were boarded up except the building at the north facing entrance. Evidence of vandalism was observed in this building. A steel shed is located in the south west corner of the property. The large roll-up door of this building and its side door was open providing unrestricted access to Site visitors. Evidence of graphitic writings inside the building were observed. The remnant conveyor tower is located in the middle of the property. Drums of unknown contents were stored inside the remnant conveyor tower. Historical information indicates that the drums are suspected to contain hydraulic fluid. The Site is accessible to foot traffic through three gaps in the west fence, separating the Site from a Boys and Girls Club facility.

Typical ground cover consisted of soil and several auto-shredder fluff piles and shredded auto parts. Some areas were covered by tall grasses, brush, and debris. Areas to the east were observed to have a higher amount of fluff than other areas. The estimated total auto shredder fluff area is approximately 41,650 ft² with a total volume of 416,500 ft³ assuming an average depth of 10 feet for each fluff pile. The auto-shredder fluff was observed extending off-site beneath the west fence and in between broken fence areas in the direction of the Boys and Girls Club property. Using a grid sampling system, the Site grid was laid from north to south direction in nine 100-foot increments and split the property from east to west into two 50 foot-increments to establish the sampling grid.

Surface soil sampling was conducted to determine the presence or absence of contaminated soils and the need for removal action. A total of 7 soil samples were collected from the Site at a depth of 6 to 12 inches. Sample results were compared to the EPA Removal Management Levels (RMLs) for industrial use. Analytical results for Resource Conservation and Recovery Act (RCRA) 8 metals are shown in Table 1. Lead was detected above the industrial RML of 800 milligrams per kilogram (mg/kg) in 4 out of the 7 surface soil samples with the highest

concentration at 1,580 mg/kg. Chromium was detected above the industrial RML of 630 mg/kg in 2 out of the 7 surface soil samples with the highest chromium concentration at 1,180 mg/kg.

The fluff material consisted of soil mixed with fluffy brown material and other shredded auto parts such as rubber, plastic, metal, glass. These areas were located in grids A1, A2, A3, A6, B3, B6, B7, and outside the western fence (see Figure 1). A total of 15 samples were collected from fluff material at a depth of 3-6 inches. Lead was detected above the RML in 12 out of 15 fluff samples with the highest lead concentration at 9,280 mg/kg (see Table 1). Lead was detected outside the western fence boundary near the Boys and Girls Club at a concentration of 1,840 mg/kg. Chromium was detected in one fluff sample above the RML at a concentration of 707 mg/kg. PCBs were detected above the PCB RML of 94 mg/kg at a concentration of 101 mg/kg in the auto-shredder fluff sample collected outside the western fence. Auto-shredder fluff analytical results for TCLP metals did not indicate any exceedances of TCLP limits. Analytical results for TCLP metals are shown in Table 3.

2. Physical location

The Site is the former Zizzo Scrap Iron and Paper properties located at 1323 50th Street (north parcel) and 1320 52nd Street (south parcel), in Kenosha, Kenosha County, Wisconsin (see Figure 1 – Site Location Map). The northern parcel consists of 0.90-acres and the southern parcel consists of 0.96 acres, with Parcel ID numbers 12-223-31-276-001 and 12-223-31-276-020 respectively. The coordinates for the center of the site are 42.58950 North latitude and 87.82636 West longitude.

An Environmental Justice (EJ) analysis for the Site was conducted. Using Region 5's EJ Screen Tool (which applies the interim version of the national EJ Strategic Enforcement Assessment Tool (EJSEAT)). Region 5 has reviewed environmental and demographic data for the area surrounding the site at 1323 50th street and 1320 52nd Street in Kenosha, Wisconsin, and determined there is a high potential for EJ concerns at this location.

3. Site characteristics

The combined parcel size is approximately 1.86 acres and includes two buildings and a remnant conveyor tower. The Site is surrounded by fencing on the north, south, and west sides, and by railroad tracks on the east side. The property is physically bounded to the north side by 50th Street, to the south by State Highway 158 / 52nd Street, to the east by C & NW Transportation Company railroad tracks, and to the west by the Boys and Girls Club of Kenosha Foundation, Inc. The Site area is a mix of residential, commercial, and industrial properties.

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

The Site presents a threatened and an ongoing release of hazardous substances. Past actions to secure the property are failing, as numerous sections of fencing were damaged leaving open gaps to access the Site. Site history and the removal assessment analytical results described above indicate that hazardous substances, as defined by CERCLA Section 101(14), pollutants, and

contaminants are present at the Site, and represent an actual or potential exposure threat to nearby human populations. Concentrations of hazardous substances exceed relevant screening or regulatory levels. Specifically, samples collected from the Site show the presence of lead and PCBs on-site as well as in the breach areas of the fence in levels exceeding their applicable RMLs.

5. NPL status

The Site is not on the National Priority List (NPL), nor is it anticipated to be referred to the NPL site assessment program.

6. Maps, pictures and other graphic representations

Figure 1, Site Location Map.

Figure 2, Site Layout Map

Attachment 1, Analytical Results

Attachment 2, Photographs

Attachment 3, Detailed Cleanup Contractor Cost Estimate

Attachment 4, Independent Government Cost Estimate

Attachment 5, Administrative Record

B. Other Actions to Date

1. Previous actions

Earth Tech, Inc. conducted Phase I and Phase II Environmental Site Assessments (ESA) in 1999 for the City of Kenosha Department of City Development. Laboratory analytical data of samples collected during Phase II ESA indicated contamination with petroleum and metals, including arsenic, cadmium, and lead, exceeding EPA regional screening levels (RSLs). Samples analyzed for metals were collected at depths greater than 2 feet below ground surface. Site reconnaissance associated with both Phase I and Phase II ESAs revealed several thousand tons of auto shredder fluff at the Site.

2. Current actions

The WDNR conducted a preliminary assessment (PA) of the Site in early 2016 evaluating potential contaminant migration/exposure pathways and targets. The primary concerns at the Site were found to be surface water and soil exposure pathways (WDNR, 2016). The WDNR has requested EPA's assistance in abating threats to human health and the environment from contaminants located on the Zizzo property.

C. State and Local Authorities' Roles

1. State and local actions to date

No State or local response actions have been taken to address the release of contaminants at the Site. The City of Kenosha will attempt to secure the damaged fencing, and WDNR may post warning signs along the perimeter of the Site.

2. Potential for continued State/local response

WDNR and the local government claim inadequate resources at this time to address the release of contaminants into the environment at the Site. In an e-mail sent to EPA dated November 10, 2015, WDNR requested assistance from EPA to conduct a time-critical removal action at the Zizzo Properties Site.

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

The conditions present at the Site present a substantial threat to the public health or welfare, and the environment, and meet the criteria for time-critical removal actions in the NCP, 40 C.F.R. § 300.415(b)(1), based on the factors in 40 C.F.R. § 300.415(b)(2). These criteria include, but are not limited to, the following:

Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants.

During this assessment lead, chromium, and PCBs were detected above their respective RMLs. Lead was detected above the industrial RML of 800 mg/kg in 16 out of 22 samples ranging from 1,070 mg/kg to 9,280 mg/kg. Lead results in sample A2-04 was detected at 9,280 mg/kg and in sample A2-03 at 2,520 mg/kg. Chromium was detected above the RML of 630 mg/kg in 3 out of 22 samples with results ranging from 730 mg/kg to 1180 mg/kg. PCBs were detected at 101 mg/kg in the sample collected at FENCE-02 location which is above the RML of 94 mg/kg.

Lead is a hazardous substance, as defined by Section 101(14) of CERCLA. Lead can affect almost every organ and system in the body. The main target for lead toxicity is the nervous system, both in adults and children. Long-term exposure of adults can result in decreased performance in some tests that measure functions of the nervous system. It may also cause weakness in fingers, wrists, or ankles. Lead exposure also causes small increases in blood pressure, particularly in middle-aged and older people and can cause anemia. Exposure to high lead levels can severely damage the brain and kidneys in adults or children and ultimately cause death. In pregnant women, high levels of exposure to lead may cause miscarriage. High-level exposure in men can damage the organs responsible for sperm production. The Department of Health and Human Services has determined that lead and lead compounds are reasonably anticipated to be human carcinogens and the EPA has determined that lead is a probable human carcinogen (ATSDR, CAS # 7439-92-1, August 2007).

Chromium is a naturally occurring element found in rocks, animals, plants, and soil. The metal chromium is used for making steel. Humans exposed to high levels of chromium may experience anemia, damage to the nose, stomach, or intestines, and cancer (ATSDR, 2007).

PCBs are mixtures of up to 209 individual chlorinated compounds known as congeners. There are no known natural sources of PCBs. PCBs have been used as coolants and lubricants in transformers, capacitors, and other electrical equipment. Humans exposed to high levels of PCBs may experience skin conditions such as acne and rashes. Studies in exposed workers have shown changes in blood and urine that may indicate liver damage (ATSDR, 2007).

There are several residential dwellings within 200 feet to the north, south, and east of the Site. The Boys and Girls Club of Kenosha Foundation, Inc. neighbors the Site directly to the west. The Site is accessible through two breaches in the fence separating the Site property from the Boys and Girls Club. The highest PCB concentration was detected in the sample collected from the area immediately outside the breached western fence area in close proximity to the Boys and Girls Club. The breached fence provides unrestricted access to the Site to the surrounding population resulting in potential exposure to Site contamination. In addition, the spilled material in the breaches of the fence have high PCB contamination and pose direct and actual exposure to trespassers as well as to the Boys and Girls Club students.

High levels of hazardous substances or pollutants or contaminants in soil largely at or near the surface that may migrate.

Analytical results described above indicate that hazardous substances, as defined by CERCLA Section 101(14), pollutants, and contaminants are present in surface soils and in auto fluff piles at the Site, and represent an actual or potential threat to migrate. Concentrations of hazardous substances exceed relevant screening or regulatory levels. Off-site migration of soil and auto fluff exceeding the RML for lead and PCBs is indicated by the surface material sample collected from sample locations FENCE-01 and FENCE-02, respectively, taken from outside of the western fence separating the Site and the Boys and Girls Club. Contaminants present in surface soils at the Site also have the potential to migrate off site during dry and dusty conditions or periods of heavy precipitation or snowmelt.

Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released.

Rain and windy conditions typical of the general Midwest area will likely increase the chances of off-site migration of contaminants, likely impacting the adjacent Boys and Girls Club Facility, which is utilized by a large number of children on a daily basis.

The availability of other appropriate federal or state response mechanisms to respond to the release.

Based on the information currently available, neither the State nor the City of Kenosha have the funds or resources at this time to respond to this time-critical removal action.

IV. ENDANGERMENT DETERMINATION

Given the Site conditions, the nature of the known and suspected hazardous substances on Site, and the potential exposure pathways described in Sections II and III above, actual or threatened

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

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed action description

The response actions described in this memorandum directly address actual or potential releases of hazardous substances on Site, which may pose an imminent and substantial endangerment to public health, or welfare, or the environment. Removal activities on Site will include:

- 1) Developing and implementing a Site HASP to include a Perimeter Air Monitoring Plan and developing measures to control particulates during the removal action;
- 2) Developing a site-specific sampling plan to conduct additional characterization of the Site and thereby determine the nature and extent of lead and PCB contamination on the property;
- 3) Consolidating and packaging all hazardous substances, pollutants and contaminants for transportation and off-site disposal;
- 4) Excavation and removal of ASR debris and soil in and around the Site that presents an unacceptable risk to public health and the environment;
- 5) As necessary, deconstructing the remaining Site buildings to excavate contaminated soil and ASR debris;
- 6) Dispose of all hazardous materials at EPA-approved disposal facilities in accordance with EPA's Off-Site Rule (40 C.F.R. §300.440);
- 7) Conducting sampling in accordance with the site-specific sampling plan to confirm the removal action's efficacy;
- 8) Backfilling excavated areas with clean material and topsoil and restoring other disturbed areas;
- 9) Providing and maintaining Site security and fencing as necessary; and
- 10) Taking other response actions to address any release or threatened release of a hazardous substance, pollutant or contaminant that the EPA OSC determines may pose an imminent and substantial endangerment to public health or the environment.

The removal action will be conducted in a manner not inconsistent with the NCP. The OSC has determined that post-removal Site controls consistent with the provisions of Section 300.415(l) of the NCP will not be required upon completion of this removal action.

The threat posed by the lead and PCB contamination at the Site meet the criteria listed in NCP Section 300.415(b), and the response actions proposed herein are consistent with any long-term remedial actions that may be required. Eliminating hazardous substances, pollutants and contaminants that pose a substantial threat of release is expected to greatly minimize substantial requirements for post-removal Site controls.

Off-Site Rule

All hazardous substances, pollutants, or contaminants removed off-site pursuant to this removal action for treatment, storage, and disposal shall be treated, stored, or disposed of at a facility in compliance, as determined by EPA, with the EPA Off-Site Rule, 40 C.F.R. § 300.440.

2. Contribution to remedial performance:

The proposed action will not impede future actions based on available information. No long-term remedial actions are anticipated for the Site.

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

Not Applicable.

4. Applicable or relevant and appropriate requirements (ARARs)

All applicable, relevant and appropriate requirements (ARARs) of federal and State law will be complied with to the extent practicable considering the exigencies of the circumstances.

Federal

RCRA/TSCA Regulations

State

WDNR applicable regulations

An e-mail message was sent to John Sager of WDNR on November 18th, 2016, asking for any State of Wisconsin ARARs. All state ARARs identified in a timely manner will be complied with to the extent practicable during this removal action.

5. Project Schedule

The removal activities are expected to take approximately 60 on-site working days to complete.

B. Estimated Costs

REMOVAL ACTION PROJECT CEILING ESTIMATE	
<u>Extramural Costs:</u>	
<u>Regional Removal Allowance Costs:</u>	
Total Cleanup Contractor Costs (This cost category includes estimates for ERRS, subcontractors, Notices to Proceed, and Interagency Agreements with Other Federal Agencies. Include a 15% contingency)	\$1,588,782
<u>Other Extramural Costs Not Funded from the Regional Allowance:</u>	
Total START, including multiplier costs	\$ 107,500
Total Decontamination, Analytical & Tech. Services (DATS)	\$ 0
Total CLP	\$ 0
Subtotal	\$ 107,500
Subtotal Extramural Costs	\$1,696,282
Extramural Costs Contingency (15% of Subtotal, Extramural Costs)	\$ 254,442
	\$1,950,724
TOTAL REMOVAL ACTION PROJECT CEILING	

The response actions described in this memorandum directly address actual or threatened releases of hazardous substances, pollutants, or contaminants at the Site that may pose an imminent and substantial endangerment to public health and safety and the environment. These response actions do not impose a burden on the affected property disproportionate to the extent to which that property contributes to the conditions being addressed.

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

Given the Site conditions, the nature of the hazardous substances and pollutants or contaminants documented on Site, and the potential exposure pathways to nearby populations described in Sections II, III and IV, above, failing to take or delaying action may present an imminent and substantial endangerment to public health, or welfare, or the environment. Such failure to act would likely increase the potential that those hazardous substances would be released, thereby threatening the adjacent population and the environment.

VII. OUTSTANDING POLICY ISSUES

None

VIII. ENFORCEMENT

For administrative purposes, information concerning the enforcement strategy for this Site is contained in the Enforcement Confidential Addendum.

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 \$3,240,373.¹

$$(\$1,950,724 + \$50,000) + (61.96\% \times \$2,000,724) = \$3,240,373$$

IX. RECOMMENDATION

This decision document represents the selected removal action for the Zizzo Properties Site, Kenosha, Kenosha County, Wisconsin 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 (Attachment 5). Conditions at the Site meet the NCP Section 300.415(b) criteria for a removal action, and I recommend your approval of the removal action proposed in this Action Memorandum.

The total project ceiling if approved will be \$1,950,724, of which an estimated \$1,843,224 may be used for cleanup contractor costs. You may indicate your approval by signing below.

Approve:


Acting Director, Superfund Division


Date

Disapprove:

Acting Director, Superfund Division

Date

Enforcement Addendum

Figure 1 Site Location Map

Figure 2 Site Layout Map

Attachments:

1. Analytical Results
2. Photographs
3. Detailed Cleanup Contractor Cost Estimate
4. Independent Government Cost Estimate
5. Administrative Record Index
6. EJ Screen Report

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.

cc: Brian Schlieger, U.S. EPA, 5104A/B517F (**Schlieger.Brian@epa.gov**)
Lindy Nelson, U.S. DOI, w/o Enf. Addendum (**Lindy_Nelson@ios.doi.gov**)
J. Sager, WDNR w/o Enf. Addendum
(email: **john.sager@wisconsin.gov**)

BCC PAGE HAS BEEN REDACTED

**NOT RELEVANT TO SELECTION
OF REMOVAL ACTION**

ENFORCEMENT ADDENDUM

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ENFORCEMENT CONFIDENTIAL

NOT SUBJECT TO DISCOVERY

FOIA EXEMPT

NOT RELEVANT TO SELECTION

OF REMOVAL ACTION

Figure 1

**Site Location Map
Zizzo Properties Site
Kenosha, Wisconsin**

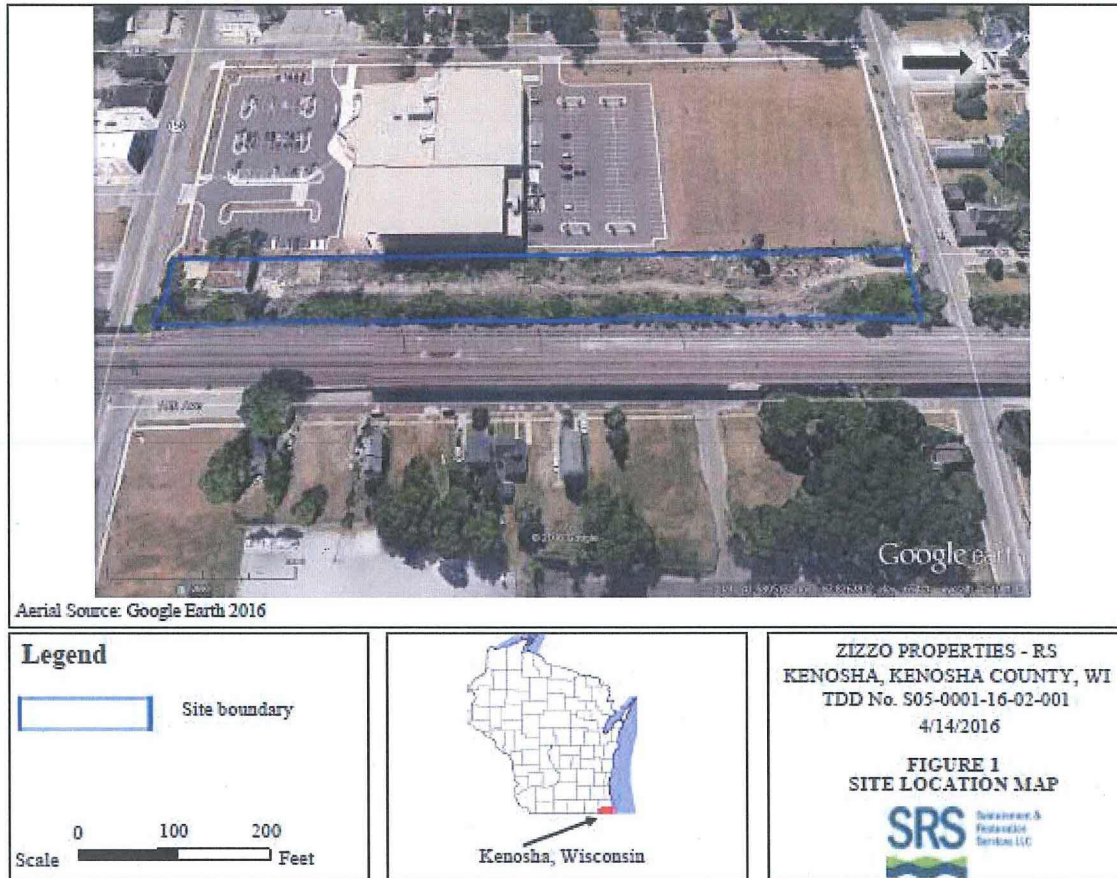
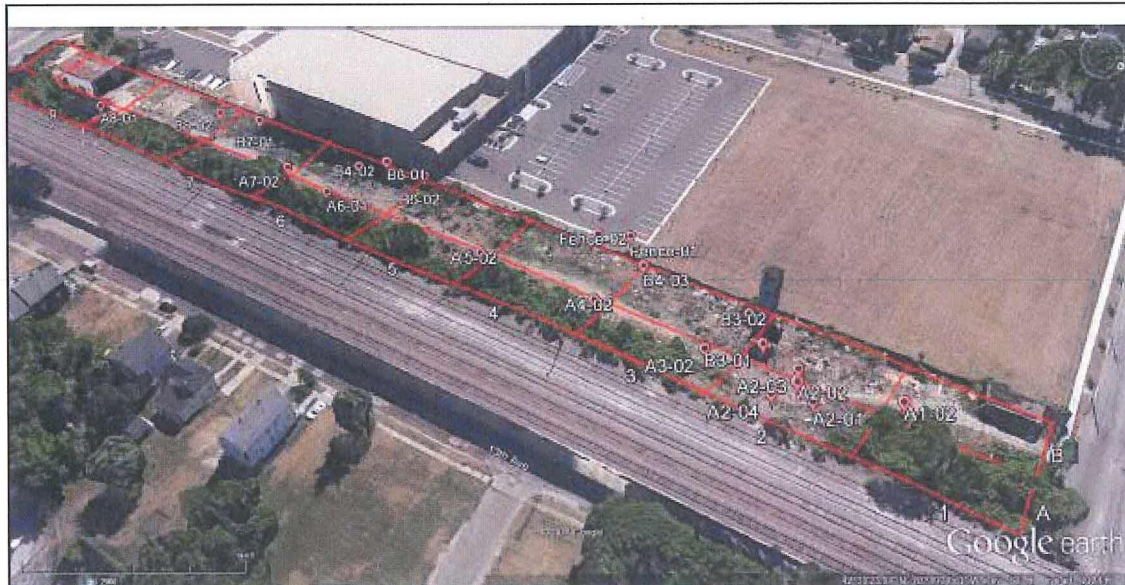


FIGURE 2
SITE LAYOUT
Zizzo Properties Site
Kenosha, Wisconsin

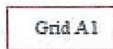


Aerial Source: Google Earth 2016

Legend



Site Boundary



Grid A1

A

Sample Location ID



N

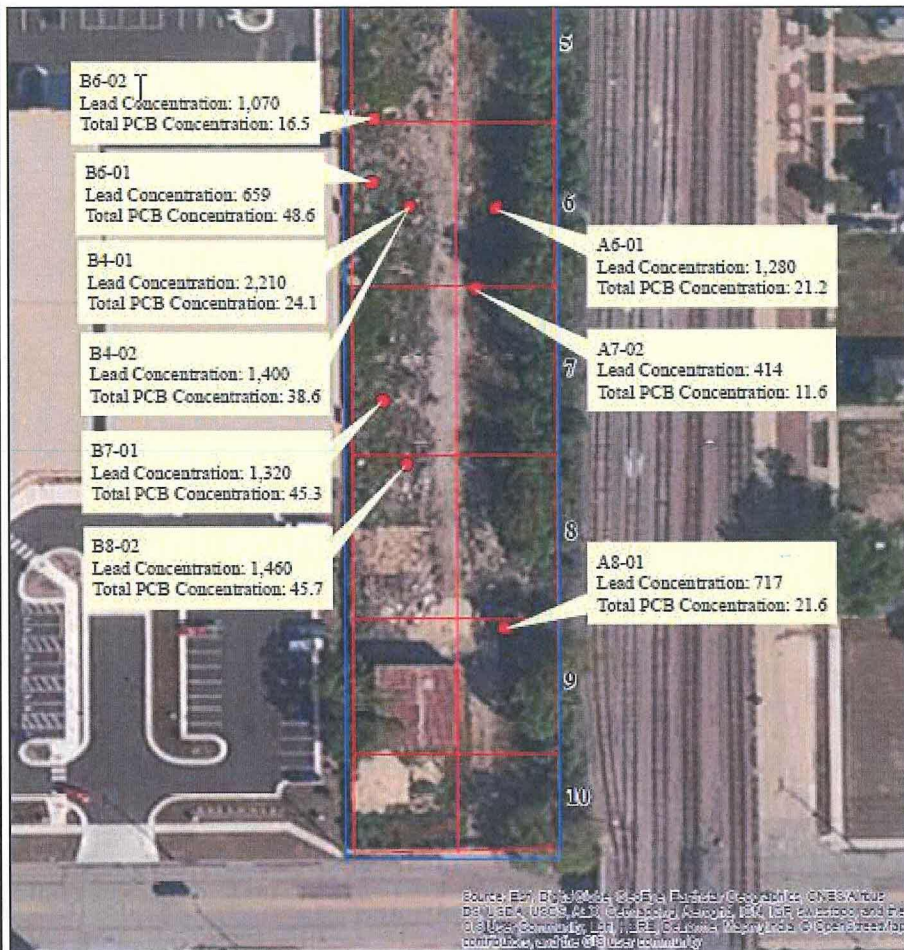
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ZIZZO PROPERTIES - RS
KENOSHA, KENOSHA COUNTY,
WISCONSIN
TDD No. S05-0001-16-02-001

REFERENCE MAP



Analytical results continued



ZIZZO PROPERTIES - RS
KENOSHA, KENOSHA COUNTY, WI
TDD No. 905-0001-16-01-001
4/14/2016

FIGURE 3.
LEAD AND TOTAL PCB
CONCENTRATIONS IN SOIL SAMPLES



Legend

Map 2 of 2

- A1-02 Sample location A1-02
- Grid
- Study Area

Lead and total PCB concentrations are measured in mg/kg.

0 25 50 100 Feet



Analytical continued

W5

Table 1 Total RCRA Metals Results Zizzo Properties - R5 Kenosha, Wisconsin Analyte - (mg/kg)								
Sample ID	Arsenic	Barium	Cadmium	Chromium	Lead	Mercury	Selenium	Silver
	Removal Management Level (RML) Industrial - (mg/kg)							
	300	650,000	2,900	630	800	140	18,000	18,000
Auto-shredder Fluff Analytical Results:								
A1-02	<7.3	3970	65.0	516	1830	12.1	2.6	4.3 J
A2-01	80.3	1700	61.4	262	2130	16.2	<1.0	4.8
A2-02	27.3	2000	75.9	267	1750	10.9	2.1 J	5.3
A2-03	<7.2	434	15.3	77.8	2520	1.8	<0.87	1.8
A2-04	17.8 J	2070	54.8	262	9280	23.2	13.7	4.2
A3-02	<8.4	1350	57.0	233	1400	37.9	3.8	5.7
A5-01	8.6 J	387	24.7	419	1280	4.3	<0.86	2.4
B3-01	15.9 J	1160	37.7	157	1400	8.0	0.97 J	4.6
B3-02	17.8 J	1370	16.9	707	512	3.2	<7.2	3.6 J
B4-01	21.3 J	790	31.5	233	2210	6.4	3.1	10.3
B4-02	13.3 J	667	39.1	135	1400	7.7	1.7 J	7.3
B5-01	9.9 J	312	44.7	118	659	9.6	<0.82	3.4 J
B7-01	16.8 J	734	41.2	399	1320	1.1	<9.0	4.3 J
FENCE-01	<6.6	135	8.7	105	1840	0.96	<8.0	7.0 J
FENCE-02	60.9	185	4.4 J	36.7	310	2.3	<8.3	<3.0
Soil Analytical Results:								
A4-02	<7.2	623	25.7	114	1420	1.6	1.1 J	3.4
A5-02	5.1	64.3	1.2	14.9	76.6	0.19	<0.87	<0.32
A7-02	12.9 J	283	10.9	92.8	414	0.38	<8.1	<1.9
A8-01	<7.0	169	9.2	1180	717	0.66	<8.4	<3.0
B4-03	9.1 J	690	52.7	163	1580	6.1	1.3 J	33.8
B5-02	12.8 J	838	49.0	234	1070	12.2	0.86 J	4.2 J
B8-02	<6.9	351	17.0	1020	1460	1.6	2.2 J	4.0 J

Notes:

mg/kg- milligrams per kilogram
 bold/highlighted- value exceeds EPA Removal Management Level
 J- estimated value

Sample B4-02 is the duplicate sample of sample B4-01.
 All samples were collected on April 14th, 2016.

Analytical Methods:

All Total RCRA Metals in soil analysis, except mercury, was performed by EPA method SW-846 1311 and SW-846 6010D.
 RCRA Metals in soil analysis for mercury was performed by EPA method SW-846 1311 and SW-846 7470/7471.

Analytical continued

Table 2 PCBs Analytical Results Zizzo Properties - RS Kenosha, Wisconsin								
Sample ID	Analyte - (µg/kg)							
	PCB, Total	PCB-1016 (Aroclor 1016)	PCB-1221 (Aroclor 1221)	PCB-1232 (Aroclor 1232)	PCB-1242 (Aroclor 1242)	PCB-1248 (Aroclor 1248)	PCB-1254 (Aroclor 1254)	PCB-1260 (Aroclor 1260)
EPA Removal Management Level (RML) Industrial - (µg/kg)								
	94,000	94,000	94,000	94,000	94,000	94,000	94,000	94,000
Soil Sample Analytical Results								
A1-02	64900	<6440	<6440	<6440	31100	<6440	33800	<6440
A2-01	56300	<3260	<3260	<3260	29200	<3260	27100	<3260
A2-02	40300	<3110	<3110	<3110	20600	<3110	19700	<3110
A2-03	7820	<590	<590	<590	3130	<590	4690	<590
A2-04	59000	<3060	<3060	<3060	30600	<3060	24300	4070 J
A3-02	33000	<3360	<3360	<3360	21100	<3360	11800	<3360
A5-01	21200	<3060	<3060	<3060	<3060	<3060	21200	<3060
B3-01	42000	<2910	<2910	<2910	21600	<2910	17200	3200 J
B3-02	5930	<274	<274	<274	3390	<274	2560	<274
B4-01	24100	<5810	<5810	<5810	24100	<5810	<5810	<5810
B4-02	38600	<5970	<5970	<5970	38600	<5970	<5970	<5970
B5-01	4860	<146	<146	<146	1360	<146	2430	1030
B7-01	4530	<146	<146	<146	2240	<146	1730	563
FENCE-01	1620	<84.3	<84.3	<84.3	689	<84.3	735	192
FENCE-02	101000	<15000	<15000	<15000	101000	<15000	<15000	<15000
Auto-shredder Fluff Analytical Results								
A4-02	28800	<3020	<3020	<3020	28800	<3020	<3020	<3020
A5-02	329	<30.0	<30.0	<30.0	62.1	<30.0	182	84.4
A7-02	1160	<30.4	<30.4	<30.4	267	<30.4	487	409
A8-01	2160	<114	<114	<114	419	<114	1360	378
B4-03	18000	<1030	<1030	<1030	8120	<1030	9860	<1030
B5-02	16300	<1330	<1330	<1330	9810	<1330	6640	<1330
B8-02	4370	<284	<284	<284	4370	<284	<284	<284

Notes:
Bold/highlighted - value exceeds the EPA Removal Management Level (July 2015)
 µg/kg - Micrograms per kilogram

B4-02 was the duplicate sample of B4-01.
 All samples were collected April 14th, 2016.

Analytical
 All PCBs in soil and auto-shredder fluff analysis was performed by EPA method SW-846 8082.

Analytical continued

<p style="text-align: center;">Table 3 TCLP Metals Analytical Results Zizzo Properties - RS Kewaunee, Wisconsin</p>								
Sample ID	Analysis - (mg/L)							
	Arsenic	Barium	Cadmium	Chromium	Lead	Mercury	Selenium	Silver
	5	500	5	1,000	50	15 ^b	200	10
Auto-chredder Fluff Analytical Results								
A1-02	<0.12	3.6	0.61	<0.12	0.58	0.00035 J	<0.12	<0.12
A3-01	<0.12	3.7	0.61	<0.12	1.0	<0.00013	<0.12	<0.12
A1-02	<0.12	4.2	0.60	<0.12	0.90	0.00037 J	<0.12	<0.12
A1-03	<0.12	<1.2	0.013	<0.12	0.15	<0.00013	<0.12	<0.12
A2-04	<0.12	5.0	0.62	<0.12	1.3	<0.00013	<0.12	<0.12
A3-02	<0.12	3.9	0.51	<0.12	0.97	<0.00013	<0.12	<0.12
A6-01	<0.12	1.3 J	0.21	<0.12	1.1	<0.00013	<0.12	<0.12
B1-01	<0.12	3.0	0.49	<0.12	4.2	<0.00013	<0.12	<0.12
B1-02	<0.12	3.7	0.15	<0.12	0.060 J	<0.00013	<0.12	<0.12
B4-01	<0.12	2.2 J	0.47	<0.12	1.6	<0.00013	<0.12	<0.12
B4-02	<0.12	2.5	0.16	<0.12	0.99	<0.00013	<0.12	<0.12
B6-01	<0.12	1.3 J	0.73	<0.12	4.8	<0.00013	<0.12	<0.12
B7-01	<0.12	1.5 J	0.67	<0.12	4.2	<0.00013	<0.12	<0.12
FENCE-01	<0.12	<1.2	0.063	<0.12	0.43	<0.00013	<0.12	<0.12
FENCE-02	<0.12	<1.2	0.025 J	<0.12	0.053 J	<0.00013	<0.12	<0.12
Soil Analytical Results								
A4-02	<0.12	1.5 J	0.24	<0.12	4.5	<0.00013	<0.12	<0.12
A5-02	<0.12	<1.2	0.024 J	<0.12	0.075	<0.00013	<0.12	<0.12
A7-02	<0.12	1.6 J	0.051	<0.12	0.13	<0.00013	<0.12	<0.12
A8-01	<0.12	<1.2	0.051	<0.12	0.11	<0.00013	<0.12	<0.12
B4-03	<0.12	2.5 J	0.43	<0.12	0.28	<0.00013	<0.12	<0.12
B6-02	<0.12	2.6	0.73	<0.12	3.4	<0.00013	<0.12	<0.12
B8-02	<0.12	2.7	0.19	<0.12	3.2	<0.00013	<0.12	<0.12

Notes:

40 CFR 261.24-
 mg/L-
 J-
 bold highlight-
 value exceeds the TCLP guidelines

TCLP values compared to guidelines set for in 40 CFR 261.24
 milligrams per liter
 estimated value

Sample B4-02 is the duplicate sample of B4-01.
 All samples were collected April 14th, 2016.

Analytical Methods:

All TCLP Metals in soil analysis, except mercury, was performed by EPA method SW-846 1311 and SW-846 6010D.
 TCLP Metals in soil analysis for mercury was performed by EPA method SW-846 1311 and SW-846 7040.

ATTACHMENT 2

SITE PHOTOGRAPHS Zizzo Properties Site Kenosha, Wisconsin

November 2016

Site: Zizzo Properties - R5
Contract: EP-S5-16-01
TDD: TO-01-13-11-1032
OSC: Brad Benning

Date: April 14, 2016
Orientation: Southwest
Photographer:
Katherine Cooper

Official Photograph No. 5:
Remnant Tower located in
the middle of the Site
property.



Site: Zizzo Properties - R5
Contract: EP-S5-16-01
TDD: TO-01-13-11-1032
OSC: Brad Benning

Date: April 14, 2016
Orientation: West
Photographer:
Katherine Cooper

Official Photograph No. 6:
First access point onto site,
north of remnant tower, through
west fence separating the Site
from the Boys & Girls Club.

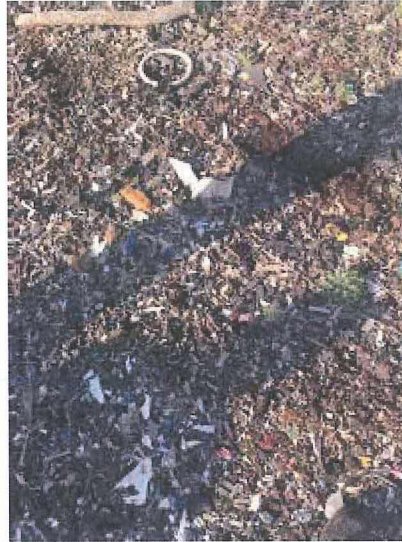


Site Photographs Continued

Site: Zizzo Properties - RS
Contract: EP-S5-16-01
TDD: S05-0001-16-02-001
OSC: Brad Benning

Date: April 14, 2016
Photographer:
Katherine Cooper

Official Photograph No. 9:
Typical ground cover at Site,
consists of an auto-shredder
fluff and soil mix.




Site: Zizzo Properties - RS
Contract: EP-S5-16-01
TDD: S05-0001-16-02-001
OSC: Brad Benning

Date: April 14, 2016
Orientation: North
Photographer:
Katherine Cooper

Official Photograph No. 10:
Typical ground cover at Site
includes tall grasses, brush, and
debris.



Site Photographs Continued

<p>Site: Zizzo Properties - RS Contract: EP-S5-16-01 TDD: S05-0001-16-02-001 OSC: Brad Benning</p> <p>Date: April 14, 2016 Orientation: East Photographer: Katherine Cooper</p> <p>Official Photograph No. 13: A2 grid flagged and noted as having a higher than average concentration of auto-shredder fluff</p>	 A photograph showing a steep, eroded hillside covered in a thick layer of brown, fibrous material (auto-shredder fluff) and various pieces of debris. The top of the hill is lined with bare, dark trees against a clear blue sky.
<p>Site: Zizzo Properties - RS Contract: EP-S5-16-01 TDD: S05-0001-16-02-001 OSC: Brad Benning</p> <p>Date: April 14, 2016 Orientation: East Photographer: Katherine Cooper</p> <p>Official Photograph No. 14: A3 grid flagged and noted as having a higher than average concentration of auto-shredder fluff</p>	 A photograph showing a similar view of a hillside covered in debris and auto-shredder fluff. The hillside is more densely covered with the brown, fibrous material. Bare trees are visible at the top of the hill against a clear blue sky.

Site Photographs Continued

Site: Zizzo Properties - RS
Contract: EP-S5-16-01
TDD: S05-0001-16-02-001
OSC: Brad Benning

Date: April 14, 2016
Orientation: South
Photographer:
Katherine Cooper

Official Photograph No. 18:
Auto-shredder fluff and soil
mix extending off-site beneath
western fence; noted as having
a higher than average
concentration of auto-shredder
fluff.



Site: Zizzo Properties - RS
Contract: EP-S5-16-01
TDD: S05-0001-16-02-001
OSC: Brad Benning

Date: April 14, 2016
Orientation: East
Photographer:
Katherine Cooper

Official Photograph No. 19:
Sample location A4 noted and
flagged as a soil sample
location.



ATTACHMENT 3

DETAILED CLEANUP CONTRACTOR ESTIMATE

HAS BEEN REDACTED – ONE PAGE

**NOT RELEVANT TO SELECTION
OF REMOVAL ACTION**

ATTACHMENT 4

INDEPENDENT GOVERNMENT COST ESTIMATE

HAS BEEN REDACTED – TWO PAGES

NOT RELEVANT TO SELECTION

OF REMOVAL ACTION

ATTACHMENT 5

**U.S. Environmental Protection Agency
Removal Action
Administrative Record
Zizzo Properties Site
Kenosha, Wisconsin**

Original

No.	Date	Author	Recipient	Title/Description	Pages
1	11/10/2015	WDNR	Mike Ribordy, EPA	Site Referral	5
2	04/01/199	Earth Tech	City of Kenosha	Phase I Environmental Assessment	64
3	2016	WDNR	EPA	Superfund Preliminary Assessment	51
4	06/06/2016	Tetra Tech	USEPA	Final Removal Assessment	76
5	Pending	Brad Benning, EPA	Douglas Ballotti, EPA	Action Memorandum	26

ATTACHMENT 6

EJ SCREEN REPORT Zizzo Properties Site Kenosha, Wisconsin

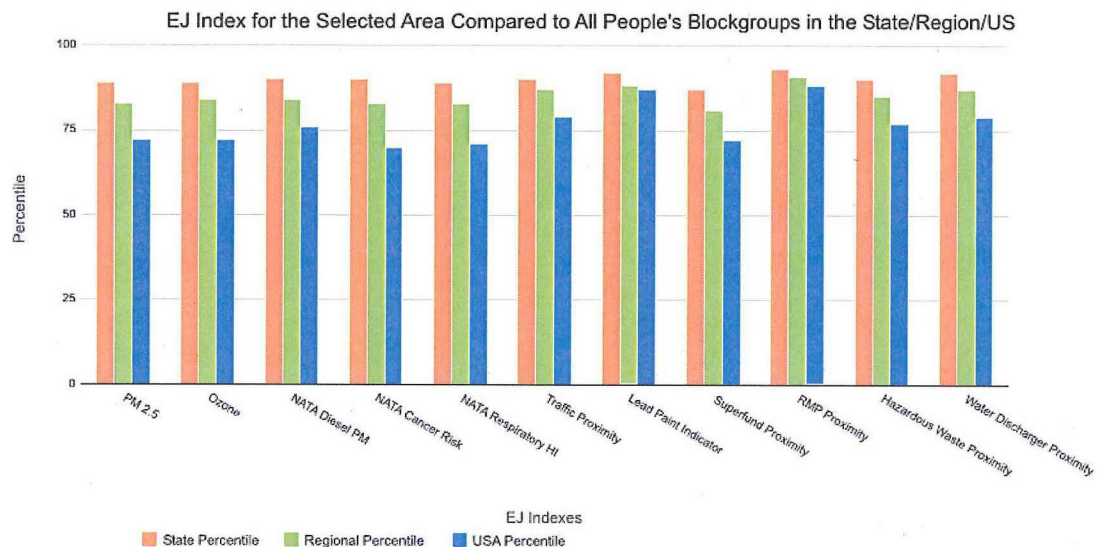
November 2016



EJSCREEN Report (Version 2016)
1 mile Ring Centered at 42.588077,-87.826442
WISCONSIN, EPA Region 5
Approximate Population: 17,540
Input Area (sq. miles): 3.14
Zizzo Properties



Selected Variables	Percentile in State	Percentile in EPA Region	Percentile in USA
EJ Indexes			
EJ Index for Particulate Matter (PM 2.5)	89	83	72
EJ Index for Ozone	89	84	72
EJ Index for NATA* Diesel PM	90	84	76
EJ Index for NATA* Air Toxics Cancer Risk	90	83	70
EJ Index for NATA* Respiratory Hazard Index	89	83	71
EJ Index for Traffic Proximity and Volume	90	87	79
EJ Index for Lead Paint Indicator	92	88	87
EJ Index for Superfund Proximity	87	81	72
EJ Index for RMP Proximity	93	91	88
EJ Index for Hazardous Waste Proximity	90	85	77
EJ Index for Water Discharger Proximity	92	87	79



45



Source: Esri, HERE, DeLorme, USGS, Intermap, iPrism, Polycom, Swire, NRCAN, Esri Japan, METI, Esri China (Hong Kong), Swire (Thailand), Swire India, © OpenStreetMap contributors, and the GIS User Community

EJ Screen Continued

Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	0
National Pollutant Discharge Elimination System (NPDES)	0

Selected Variables	Value	State Average	Percentile in State	EPA Region Average	Percentile in EPA Region	USA Average	Percentile in USA
Environmental Indicators							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$)	10.2	9.48	78	10.6	27	9.32	68
Ozone (ppb)	53.3	48.3	99	50.3	83	47.4	81
NATA* Diesel PM ($\mu\text{g}/\text{m}^3$)	1.21	0.656	90	0.931	70-80th	0.937	70-80th
NATA* Air Toxics Cancer Risk (risk per MM)	39	29	93	34	70-80th	40	<50th
NATA* Respiratory Hazard Index	1.8	1.3	85	1.7	60-70th	1.8	50-60th
Traffic Proximity and Volume (daily traffic count/distance to road)	320	300	74	370	74	590	70
Lead Paint Indicator (% pre-1960s housing)	0.75	0.38	84	0.39	83	0.3	89
Superfund Proximity (site count/km distance)	0.045	0.12	29	0.12	39	0.13	39
RMP Proximity (facility count/km distance)	1.4	0.55	88	0.51	90	0.43	92
Hazardous Waster Proximity (facility count/km distance)	0.066	0.046	78	0.069	69	0.072	68
Water Discharger Proximity (count/km)	0.31	0.29	73	0.31	73	0.31	75
Demographic Indicators							
Demographic Index	53%	24%	90	29%	85	36%	76
Minority Population	44%	17%	89	24%	81	37%	64
Low Income Population	63%	31%	91	33%	89	35%	87
Linguistically Isolated Population	4%	2%	88	2%	82	5%	68
Population with Less Than High School Education	18%	9%	87	11%	81	14%	71
Population under Age 5	7%	6%	68	6%	66	6%	63
Population over Age 64	10%	14%	27	14%	31	14%	36

*The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: <https://www.epa.gov/national-air-toxics-assessment>.

For additional information, see: www.epa.gov/environmentaljustice