



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

US EPA RECORDS CENTER REGION 5



495111

REPLY TO THE ATTENTION OF:

MEMORANDUM

SUBJECT: Request for Approval and Funding for a Time-Critical Removal Action at the VE Carter School Site, 2001 W. Vliet Street, Milwaukee, Milwaukee County, Wisconsin (Site ID #C5DG)

FROM: Kathy Halbur, On-Scene Coordinator
Emergency Response Section 1

THRU: Jason H. El-Zein, Chief
Emergency Response Branch 1

TO: Margaret M. Guerriero, Acting Director
Superfund Division

I. PURPOSE

The purpose of this memorandum is to request and document your approval to expend up to \$423,356 to conduct a time-critical removal action at the VE Carter School Site (or the Site), located in Milwaukee, Milwaukee County, Wisconsin 53205. The response actions proposed herein are necessary to mitigate threats to public health, welfare, and the environment posed by the presence of uncontrolled hazardous substances at the Site. The Site contains abandoned waste as well as deteriorating building conditions that are resulting in friable asbestos and a threat of hazardous release to the sewer.

This Action Memorandum seeks approval to take actions described herein to abate the imminent and substantial endangerment posed by the hazardous substances at the Site. EPA proposes to remove hazardous substances pursuant to Section 104(a)(1) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. § 9604(a)(1), and 40 C.F.R. §300.415 of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP).

The uncontrolled conditions of the hazardous substances present at the Site, and the potential threats they present require that EPA classify this removal action as time-critical. EPA's response actions described in this Action Memorandum will require an estimated 35 on-site working days to complete.

There are no nationally significant or precedent setting issues associated with the Site. The Site is not on the National Priorities List (NPL).

II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID: WIN000507393

RCRA ID: None

WDNR ID: None

Category: Time-Critical

A. Site Description

The VE Carter School Site is an approximately 60,000 square foot (ft²) brick, multi-story former school. The building was originally constructed in the late 1800s with the first addition in the 1940s and a second addition in the 1970s. The school, formerly known as both the 5th District School and the William McKinley School, was owned and operated by Milwaukee Public Schools until September, 1991, when it was sold to VE Carter Child Development Corporation. VE Carter Development Group operated a charter school and daycare facility at the Site until a fire damaged the facility in November, 2013.

The building has fallen into disrepair since the school and daycare closed in 2013. The City of Milwaukee foreclosed on the property on July 11, 2016. There were numerous judgements and liens on the property including a Notice of Federal Tax Lien. The Title Report is available in the Administrative Record (Document #4). The school was designated as a Milwaukee Historic Site in 2014 (AR, Document #4).

Representatives from the Milwaukee Department of Neighborhood Services (MDNS) and the Wisconsin Department of Natural Resources (WDNR) conducted an assessment of the building on August 31, 2016. MDNS and WDNR inspectors identified numerous safety and environmental hazards in the building as well as evidence of significant trespassing (Attachment 4, photos 1, 3, 4, 5, & 6).

There are numerous open windows, holes in the roof, and portion of the brick façade are crumbling onto the City sidewalk (Attachment 4, photos 2 & 5). WDNR requested EPA Emergency Response Branch assistance with the Site on September 23, 2016 (AR, Document #5).

EPA's removal site assessment confirmed environmental risks at the Site, including abandoned containers of incompatible hazardous materials stored improperly, hazardous ash, mercury switches, damaged universal waste, and extensive friable asbestos. A copy of the Site Assessment Report is available in the Administrative Record (Document #9). The City of Milwaukee has posted warning signs on the building entrances (Attachment 4, photos 2 & 4).

1. Removal site evaluation

On October 26, 2016, EPA OSC Kathy Halbur conducted a reconnaissance visit with MDNS and EPA START to plan for the Removal Site Assessment which was conducted on November 9, 2016. There was evidence of trespass in the building (Attachment 4, photos 3-6), despite the

City of Milwaukee's efforts to secure the building. MDNS inspectors identified two unsecured entrances during their initial walk through on August 31, 2016. The City's contractor secured those entrances the same day. These entrances were found to be torn open upon subsequent visits by MDNS. Additional entrances were found during the November 9, 2016, Site Assessment. A report of MDNS' efforts and ongoing struggles to secure the building is available in the Administrative Record (Document #6). MDNS, Milwaukee Police and Milwaukee Fire regularly check the building and report break-ins to the City's board-up contractor.

EPA identified numerous abandoned containers in the building during the Site Assessment. Some containers have been strewn around the building by trespassers (Attachment 4, photo 8) while others are still stored in maintenance areas. Incompatible chemicals (i.e., acids and flammable materials) are stored adjacent to each other in fragile and failing containers (Attachment 4, photo 9). Sampling confirmed placarding on abandoned containers (e.g., flammable material with a flashpoint of 104.5° F). The risk of a trespasser disturbing these containers is very high.

Sources of lead were found throughout the building. Ash remaining in the incinerator had total lead concentrations of 1,230 mg/kg. Lead was detected in standing water in the sump at 21 µg/L. While not a part of this action, lead paint is peeling throughout the building.

There is a significant amount of friable asbestos throughout the building. Activity based air sampling demonstrated levels as high as 0.411 structure per cubic centimeter (s/cc), four times the OSHA permissible exposure level of 0.1 s/cc in the building. In some parts of the building, the airborne asbestos is so thick, it looks like snow (Attachment 4, photo 7). Thirteen bulk asbestos samples collected during the Site Assessment contained either chrysotile or amosite asbestos. The asbestos content in these samples ranged from 3 percent to 55 percent. Nine of these samples are considered friable. Air sampling outside the building in nearby playgrounds to the north and south of the building indicated that the asbestos is currently contained in the building.

Additionally, other hazardous building components and universal waste was identified that pose a threat of release as the structure continues to deteriorate and trespassers continue to vandalize the building. At the request of the City of Milwaukee, EPA and START removed six large mercury switches from the school during the Site Assessment and turned them over to MDNS for disposal.

Because of the hazards identified in the building, this address is listed as "No Entry Status" for both the Milwaukee Police Department and Milwaukee Fire Department" (AR, Document #6). All sampling and results are detailed in the Site Assessment Report available in the Administrative Record (Document #9).

2. Physical location

The Site is located in a residential area at 2001 W. Vliet Street, Milwaukee, Milwaukee County, WI 53205. The geographic coordinates for the Site are Latitude: 43.0478740, Longitude: -87.9383990. The legal description of the property is: Lots 1 through 22, inclusive, in Block 1 of

Lynde's Addition in the Southwest ¼ of Section 19, Township 7 North, Range 22 East, and the North ½ of the vacated West McKinley Avenue between North 20th Street and North 21st Street, all in the City of Milwaukee, Milwaukee County, Wisconsin.

The Site is surrounded by single family homes to the east, south, and north and apartment complexes to the north and northwest. A figure depicting the Site location is available in Attachment 2.

An Environmental Justice (EJ) analysis for the Site is contained in Attachment 3. Screening of the surrounding area used Region 5's EJ Screen Tool. Region 5 has reviewed environmental and demographic data for the area surrounding the Site at 2001 W. Vliet Street, Milwaukee, WI, and determined there is a high potential for EJ concerns at the Site based on every high priority variable.

3. Site Characteristics

The Site is a vacant 60,000 ft² former school and day care considered to be historically significant in a residential neighborhood. The facility closed after a fire in November, 2013. There is extensive fire damage in the annex portion that housed the day care. The main building has fallen into disrepair from negligence and vandalism. There are numerous open windows, a hole in the roof, and bricks are beginning to fall from the façade (Attachment 4, photos 2 & 5). There is evidence of extensive trespassing and vandalism throughout the building (Attachment 4, photos 3-6).

Abandoned containers are strewn throughout the building (Attachment 4, photo 8). Incompatible chemicals are stored together in maintenance closets (Attachment 4, photo 9). Ash with heavy metals remains in the boiler room. In the same room, the sump crock contains wastewater with high levels of lead. Hazardous building materials are deteriorating and vandals have destroyed abandoned universal waste. Asbestos has become friable and is now a respiratory hazard. There is no power or water service in the building.

MDNS is unable to reliably secure the building despite repeated efforts and regular checks by various city officials. The Site is fenced, but teenagers are regularly seen on the grounds (Attachment 4, photo 1). The previous owner was tax delinquent. The City of Milwaukee foreclosed on the property in July, 2016.

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

The Site presents a threat and an ongoing release of numerous hazardous substances. Abandoned containers of flammable materials, corrosives, and poisons are strewn around the building and stored incorrectly together in old and deteriorating containers. Asbestos containing materials (ACM) are severely damaged and friable creating a respiratory hazard to anyone in the building or near broken windows. Hazardous ash remains in the boiler room. A source of lead is entering the sump crock. PCB ballasts and other universal waste abandoned in the building have been destroyed by vandals.

5. NPL status

This Site is not on the National Priorities List (NPL) and has not been proposed for listing on the NPL. The Site has not received a Hazard Ranking Score and is not being referred to the NPL Site Assessment program.

6. Maps, pictures and other graphic representations

- Attachment 1: Administrative Record Index
- Attachment 2: Site Location Map
- Attachment 3: Environmental Justice Analysis
- Attachment 4: Photo Log

B. Other Actions to Date; State and Local Authorities' Roles

1. Previous actions

The building caught on fire in November, 2013. Milwaukee Fire contained the fire in the annex that housed the day care. VE Carter ceased operations after the fire and subsequently became tax delinquent. The City of Milwaukee foreclosed on the property in July, 2016. The City continually attempts to secure the building and city officials regularly patrol the building. Because of the hazards identified in the building, this address is listed as "No Entry Status" for both the Milwaukee Police Department and Milwaukee Fire Department" (AR, Document #6).

WDNR requested EPA Removal Program assistance with the Site on September 23, 2016 (AR, Document #5).

The building was designated as a Milwaukee Historic Site in 2014. The City is leading the coordination and notifications related to historical protections. The City has a Memorandum of Understanding with the State Historic Preservation Officer that applies to this Site and allows EPA's proposed removal activities.

2. Potential for continued State/local response

The City of Milwaukee plans to demolish the fire damaged annex immediately after EPA removes the hazardous materials from the building. The City is evaluating whether it will be able to salvage the main building in consideration of the building's historical significance. If the building cannot be salvaged, the City will pursue demolition funding. Either way, the City intends to conduct an abatement of the remaining asbestos after EPA conducts a removal action.

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

The conditions at the VE Carter School Site present an imminent and substantial threat to public health or welfare, and the environment, and meet the criteria for a time-critical removal action provided for in 40 C.F.R. § 300.415 (b)(2) of the NCP. These factors include, but are not limited to, the following:

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

Numerous containers of flammable and corrosive materials as well as poisons have been abandoned in the building. Many containers have been strewn around the building (Attachment 4, photo 8) indicating they have been handled by trespassers. Water collected in the sump crock in the boiler room had elevated lead levels (21 µg/L; action level is 15 µg/L). Damaged ACM (chrysotile and amosite) was documented throughout the building during EPA's Site Assessment. Activity based air samples revealed asbestos in the building's indoor air at levels four times OSHA's permissible exposure limit. Asbestos and lead are designated as hazardous substances in 40 CFR §302.4.

Signs stating that respiratory protection is needed have been posted at every entrance to the building (Attachment 4, photos 2 & 4). The City is unable to stop trespassing despite repeated efforts.

Asbestos is the name given to a number of naturally occurring fibrous minerals having high tensile strength, the ability to be woven, and resistance to heat and most chemicals. Because of these properties, asbestos fibers have been used in a wide range of manufactured goods, including roofing shingles, ceiling and floor tiles, paper and cement products, textiles, coatings, and friction products. EPA's Integrated Risk Information System (IRIS), the Department of Health and Human Services (DHHS) and the International Agency for Research on Cancer (IARC) consider chrysotile, as well as other forms of asbestos, to be human carcinogens. Exposure to airborne friable asbestos may result in a potential health risk because persons breathing the air may breathe in the asbestos fibers. Chronic inhalation exposure to excessive levels of asbestos fibers suspended in air can result in lung disease such as asbestosis, mesothelioma, and lung cancer. Sub-acute exposures as short as a few days have been shown to cause mesothelioma. Additional information about the health risks of asbestos is available in the Administrative Record (Document #1).

According to the Agency for Toxic Substances and Disease Registry's (ATSDR) "ToxFAQ for Lead" (AR, Document #3), lead can affect almost every bodily organ and system. The main target of lead toxicity is the nervous system in both adults and children. Long-term exposure of lead in adults can result in decreased performance in some tests that measure nervous system functions and cause weakness in fingers, wrists, and ankles. Lead exposure can also cause small increases in blood pressure, especially in middle-aged and older people, and anemia. Exposure to high lead levels can severely damage the brain and kidneys in adults and children and ultimately cause death. In pregnant women, high levels of exposure to lead may cause miscarriage. High-level lead exposure in men can damage the organs responsible for sperm production.

Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other

bulk storage containers that may pose a threat of release;

Numerous small (1-5 gallon) containers are being stored in the building (Attachment 4, photo 9). Many are placarded as flammable, corrosive, or poisons. Flammability was confirmed during the Site Assessment (flashpoint of 104.5). Vandals have spilled contents of some containers onto the floors near drains which lead to the City's sewers (Attachment 4, photo 8). Incompatible materials are stored together in maintenance areas (Attachment 4, photo 9). Mixing of the materials stored there would create an extremely dangerous situation.

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

The Site is deteriorating due to exposure to the environment. Many of the windows are broken. Holes in the roof and open windows allow rain and snow to enter the building (Attachment 4, photo 5). Elevated lead was detected in the building's sump crock. Airborne asbestos in the building was detected at levels four times OSHA's PEL. The hazards are currently contained within the building, but as the building continues to deteriorate, the release of these contaminants to the environment will increase.

Threat of fire or explosion;

There is evidence of vandalism in the building (Attachment 4, photo 6). Despite numerous attempts to secure the building, trespassing persists. The Site cannot be adequately secured (Attachment 4, photos 3-5). Flammable materials (flashpoint 104.5°F) are abandoned at the Site. VE Carter ceased operations after the fire in 2013 abandoning all contents of the school, including books, toys, and a variety of other combustible materials. Vandals reasonably can be expected to cause fires at the Site that would potentially release hazardous substances into the surrounding residential community. The current structure has no operating fire alarm or sprinkler system.

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

Local officials and WDNR have requested EPA assistance with the hazardous substances at the Site. The City owns the property via foreclosure. The previous owner, VE Carter, is non-responsive. There were numerous liens on the property when the City foreclosed.

IV. ENDANGERMENT DETERMINATION

Based on the Site conditions, the nature of the known and suspected hazardous substances, pollutants or contaminants onsite, and the potential exposure pathways described in Sections II and III above, actual or threatened releases of hazardous substances, pollutants or contaminants from this Site, if not addressed by implementing the response actions selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed action description

EPA proposes response actions to directly address actual or potential releases of hazardous substances on Site that may pose an imminent and substantial endangerment to public health, or welfare, or the environment. EPA will:

1. Develop and implement a Site-specific Health and Safety Plan, an Air Monitoring Plan, an Emergency Contingency Plan, and a Site Security Plan;
2. Characterize, remove and properly dispose of hazardous waste and materials abandoned at the Site;
3. Identify, remove and properly dispose of damaged hazardous building materials and asbestos-containing materials ("ACM") present at the Site that pose a direct contact risk or have the potential to migrate to the environment;
4. Assess migration pathway of spilled materials;
5. Clean drains, trenches, sumps or similar feature that poses a threat of release to the environment;
6. Clean spilled hazardous materials from floors; and
7. Take any necessary response action to address any release or threatened release of a hazardous substance, pollutant or contaminant that EPA determines may pose an imminent and substantial endangerment to the public health or the environment.

EPA will conduct its removal action in a manner not inconsistent with the NCP. The OSC has initiated planning for provision of post-removal Site control consistent with the provisions of Section 300.415(l) of the NCP. However, eliminating all threats that hazardous substances and/or pollutants or contaminants present is expected to minimize the need for post-removal Site control.

EPA shall treat, store, or dispose all hazardous substances, pollutants, or contaminants removed off-site pursuant to this removal action 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.

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

Not Applicable.

4. Applicable or relevant and appropriate requirements (ARARs)

EPA will comply with all applicable or relevant and appropriate requirements (ARARs) to the extent practicable. On March 9, 2017, EPA sent a letter to John Sager of the WDNR asking for any State of Wisconsin ARARs which may apply to or be relevant and appropriate at the Site (AR, Document #8). WDNR responded to EPA's request on March 24, 2017. A copy of WDNR's ARAR response letter is available in the Administrative Record (Document #10).

5. Project Schedule:

EPA's response action described in this Action Memorandum will require an estimated 35 working days to complete.

B. Estimated Costs

The detailed cleanup contractor cost is presented in Attachment 5 and the Independent Government Cost Estimate is presented in Attachment 6. Estimated project costs are summarized below:

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 and subcontractors. Includes a 15% contingency)	\$322,797
<u>Other Extramural Costs Not Funded from the Regional Allowance:</u>	
Total START, including multiplier costs	\$30,000
Subtotal Extramural Costs	\$352,797
Extramural Costs Contingency (20% of Subtotal, Extramural Costs rounded to nearest thousand)	\$70,559
TOTAL REMOVAL ACTION PROJECT CEILING	\$423,356

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, the actual or threatened release of hazardous substances and pollutants or contaminants from the Site presents an imminent and substantial endangerment to public health, welfare or the environment if EPA does not take this action. This will increase the

potential that hazardous substances will be released, thereby threatening the adjacent population and the environment. Delayed or non-action may result in increased likelihood of external exposure, inhalation, ingestion or direct contact to human populations trespassing at or near the Site.

VII. OUTSTANDING POLICY ISSUES

Not applicable.

VIII. ENFORCEMENT

For administrative purposes, information concerning confidential enforcement strategy for this Site is contained in the Confidential Enforcement 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 \$766,647.¹

Direct Costs (\$423,356 + \$50,000)	+ Indirect Costs + (61.96%) x (\$473,356)	= Estimated EPA Costs for Removal Action (\$766,647)
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IX. RECOMMENDATION

This decision document represents the selected removal action for the VE Carter School Site, Milwaukee, Milwaukee County, WI, 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 1). Conditions at the Site meet the NCP Section 300.415(b)(2) criteria for a removal and I recommend your approval of the removal action proposed in this Action Memorandum.

The total project ceiling if approved will be \$423,356, of which an estimated \$393,356 may be used for cleanup contractor costs. You may indicate your approval by signing below.

APPROVE 
Acting Director, Superfund Division

DATE: 3/30/2017

DISAPPROVE _____
Acting Director, Superfund Division

DATE: _____

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.

Enforcement Addendum

Attachments

1. Administrative Record Index
2. Site Location Map
3. Environmental Justice Analysis
4. Photo Log
5. Detailed Cleanup Contractor Cost Estimate
6. Independent Government Cost Estimate

cc: B. Schlieger, U.S. EPA, 5104A, (email: Brian.Schleiger@DC/USEPA/US)
L. Nelson, U.S. DOI, **w/o Enf. Addendum** (email: lindy_nelson@ios.doi.gov)
J. Sager, Wisconsin Department of Natural Resources, **w/o Enf. Addendum**
(email: john.sager@wisconsin.gov)
M. Davis, Wisconsin Department of Natural Resources, **w/o Enf. Addendum** (email:
mark.davis@wisconsin.gov)

BCC PAGE HAS BEEN REDACTED

**NOT RELEVANT TO SELECTION
OF REMOVAL ACTION**

ENFORCEMENT ADDENDUM

HAS BEEN REDACTED – THREE PAGES

ENFORCEMENT CONFIDENTIAL

NOT SUBJECT TO DISCOVERY

FOIA EXEMPT

NOT RELEVANT TO SELECTION

OF REMOVAL ACTION

ATTACHMENT 1

U.S. ENVIRONMENTAL PROTECTION AGENCY
REMOVAL ACTION

ADMINISTRATIVE RECORD
FOR THE
VE CARTER SCHOOL SITE
MILWAUKEE, MILWAUKEE COUNTY, WISCONSIN

ORIGINAL
MARCH 2017

<u>NO.</u>	<u>SEMS ID</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
1	910006	9/1/01	ATSDR	Public	ToxFAQs Fact Sheet - Asbestos - CAS #1332-21-4	2
2	933002	12/17/03	Jackson/ McCudden	V.E. Carter Child Development Group, Inc.	Asbestos Management Plan	47
3	918770	8/1/07	ATSDR	Public	ToxFAQs Fact Sheet - Lead - CAS #7439-92-1	2
4	933001	2/15/16	Capital Title and Closing Services LLC	City of Milwaukee	Title Report for 2001 West Fliet Street	90
5	933005	9/23/16	Sager, J., WDNR	Ribordy, M., U.S. EPA	Email re: Request for EPA Removals Assistance	1
6	933003	10/28/16	Kraco, C., City of Milwaukee	Halbur, K., U.S. EPA	Email re: 10/25/2016 Site Visit	2
7	933004	1/19/17	El-Zein, J., U.S. EPA	Edwards, M.	General Notice Letter (Redacted)	4
8	933030	3/9/17	Halbur, K., U.S. EPA	Sager, J., WDNR	Letter re: Request for State ARARs for VE Carter School Site	2
9	933007	3/10/17	Baker, A., Tetra Tech	Halbur, K., U.S. EPA	Revised Final Site Assessment Report	1707

10	933029	3/24/17	Sager, J., WDNR	Halbur, K., U.S. EPA	Letter re: U.S. EPA Removal Action ARARs for VE Carter School Site	4
11	-	-	Halbur, K., U.S. EPA	Guerriero, M., U.S. EPA	Action Memorandum re: Request for a Time-Critical Removal Action at the VE Carter School Site <i>(PENDING)</i>	-

ATTACHMENT 3

ENVIRONMENTAL JUSTICE SCREEN VE CARTER SCHOOL SITE MILWAUKEE, MILWAUKEE COUNTY, WISCONSIN MARCH 2017



EISCREEN Report (Version 2016)



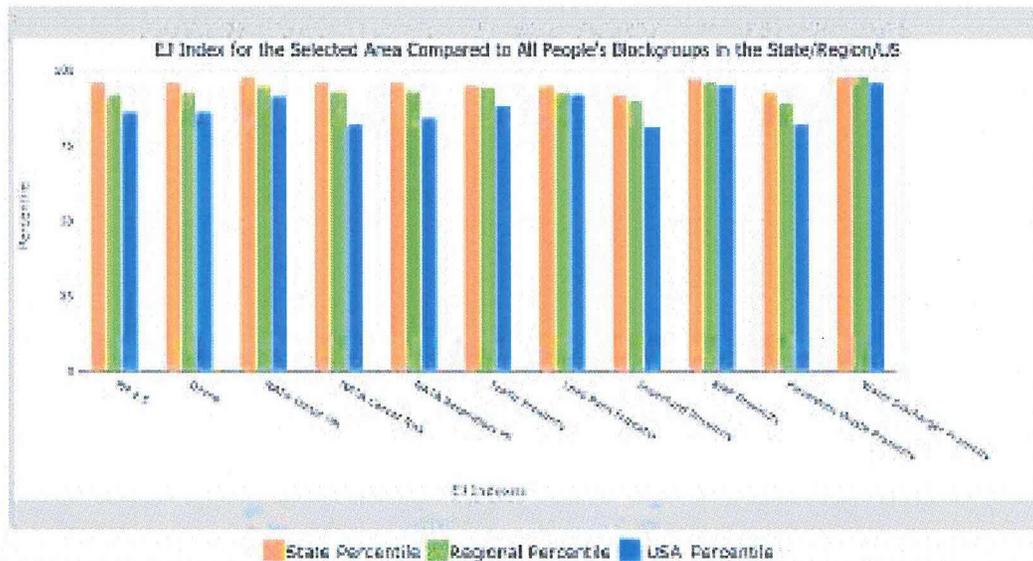
0.5 mile Ring Centered at 43.048552, -87.938391, WISCONSIN, EPA Region 5

Approximate Population: 7,590

Input Area (sq. miles): 0.79

VE Carter Site

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
EJ Indexes			
EI Index for PM2.5	96	92	86
EI Index for Ozone	96	93	86
EI Index for NATA ¹ Diesel PM	98	95	91
EI Index for NATA ¹ Air Toxics Cancer Risk	96	93	82
EI Index for NATA ¹ Respiratory Hazard Index	96	93	84
EI Index for Traffic Proximity and Volume	96	94	88
EI Index for Lead Paint Indicator	96	93	92
EI Index for Superfund Proximity	92	90	81
EI Index for RMP Proximity	97	96	95
EI Index for Hazardous Waste Proximity ²	93	89	82
EI Index for Water Discharger Proximity	98	98	96



This report shows the values for environmental and demographic indicators and EISCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EISCREEN documentation for discussion of these issues before using reports.

March 03, 2017

1/3

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile 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	67
Ozone (ppb)	49.4	48.3	59	50.3	28	47.4	56
NATA [*] Diesel PM ($\mu\text{g}/\text{m}^3$)	1.76	0.656	98	0.931	90-95th	0.937	90-95th
NATA [*] Cancer Risk (lifetime risk per million)	38	29	92	34	70-80th	40	<50th
NATA [*] Respiratory Hazard Index	1.9	1.3	91	1.7	70-80th	1.8	60-70th
Traffic Proximity and Volume (daily traffic count/distance to road)	510	300	83	370	82	590	78
Lead Paint Indicator (% Pre-1960 Housing)	0.57	0.38	75	0.39	71	0.3	80
Superfund Proximity (site count/km distance)	0.06	0.12	42	0.12	51	0.13	49
RMP Proximity (facility count/km distance)	1.4	0.55	88	0.51	90	0.43	92
Hazardous Waste Proximity [†] (facility count/km distance)	0.084	0.087	70	0.11	61	0.11	60
Water Discharger Proximity (facility count/km distance)	0.78	0.29	91	0.31	90	0.31	90
Demographic Indicators							
Demographic Index	82%	24%	97	29%	97	36%	95
Minority Population	89%	17%	98	24%	94	37%	89
Low Income Population	75%	31%	96	33%	95	35%	95
Linguistically Isolated Population	3%	2%	84	2%	77	5%	62
Population With Less Than High School Education	28%	9%	95	11%	92	14%	86
Population Under 5 years of age	14%	6%	96	6%	96	6%	95
Population over 64 years of age	6%	14%	12	14%	14	14%	17

ATTACHMENT 4

**PHOTO LOG
VE CARTER SCHOOL SITE
MILWAUKEE, MILWAUKEE COUNTY, WISCONSIN
MARCH 2017**



Photo 1: Teenagers trespassing on property



Photo 2: Warning sign posted on entrance; bricks crumbling from façade onto sidewalk



Photo 3: Example of vandals breaking thru board-up efforts



Photo 4: Efforts to secure building and warning sign



Photo 5: Upper level trespasser entrance; allows storm water inside building



Photo 6: Evidence of vandalism in building



Photo 7: Friable asbestos on floor

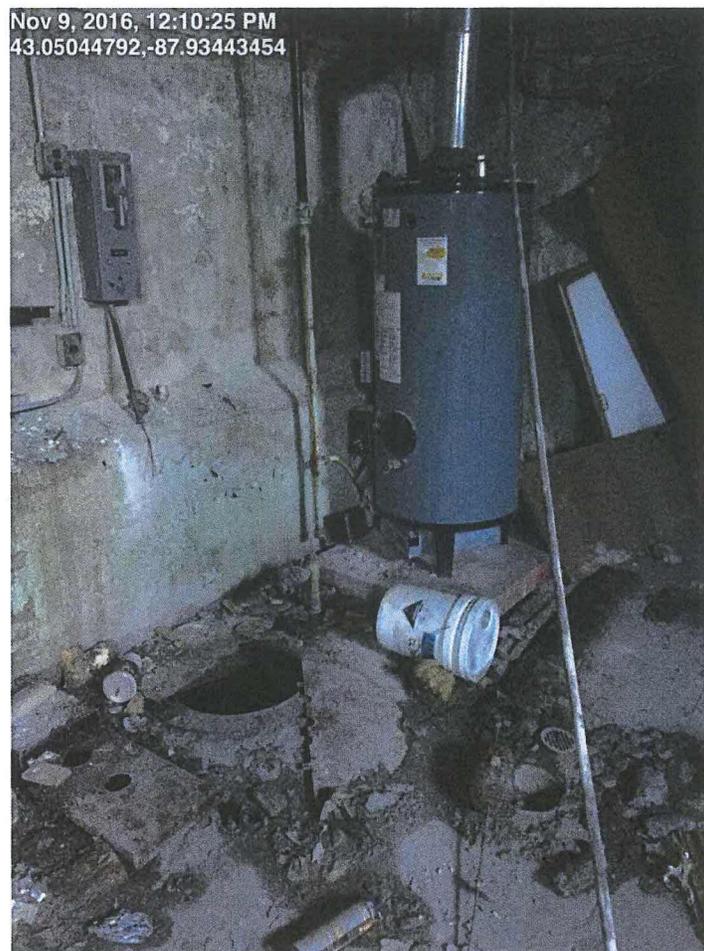


Photo 8: Sump in boiler room surrounded by abandoned container and debris

Nov 9, 2016, 12:15:48 PM
43.04856267,-87.93814155

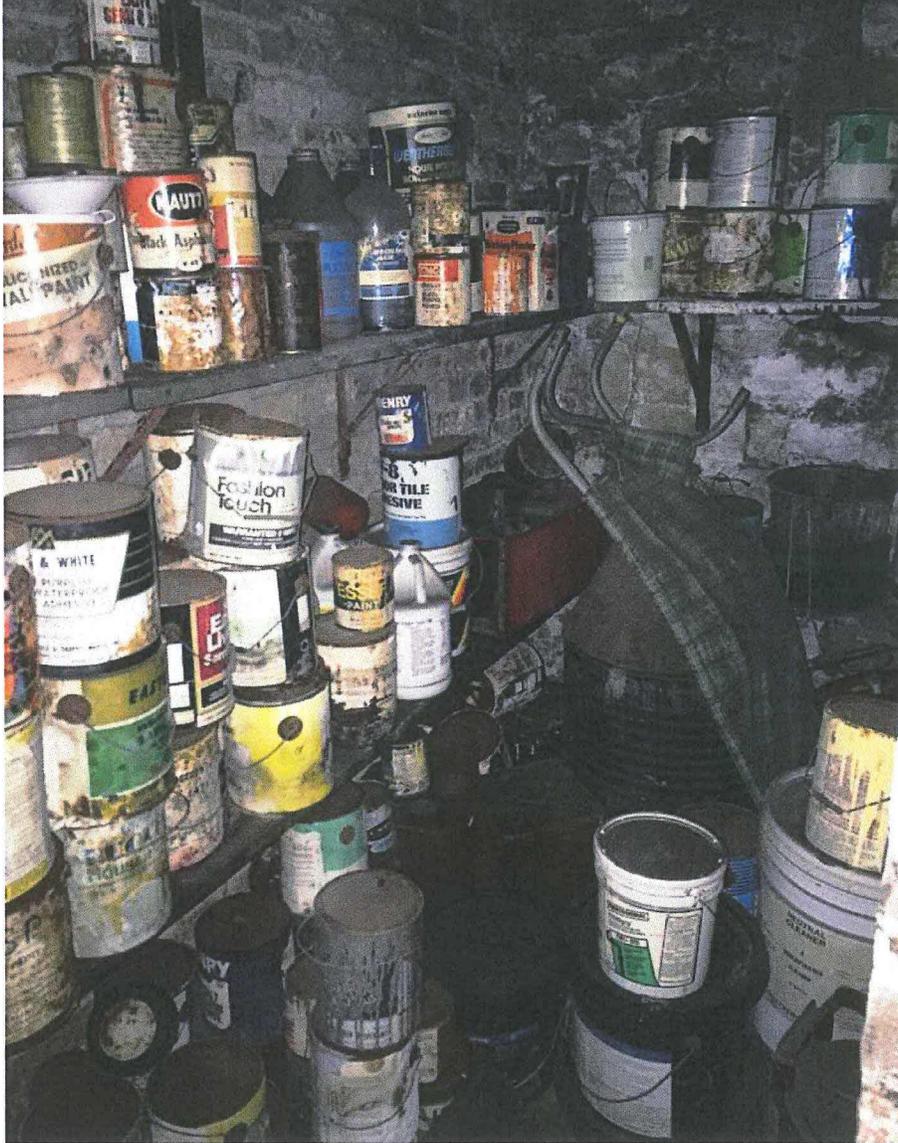


Photo 9: Abandoned containers; corrosives and flammables side by side

ATTACHMENT 5

DETAILED CLEANUP CONTRACTOR ESTIMATE

HAS BEEN REDACTED – ONE PAGE

NOT RELEVANT TO SELECTION

OF REMOVAL ACTION

ATTACHMENT 6

INDEPENDENT GOVERNMENT COST ESTIMATE

HAS BEEN REDACTED – ONE PAGE

NOT RELEVANT TO SELECTION

OF REMOVAL ACTION