



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

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Ref: 8SEM-EMR

ACTION MEMORANDUM

SUBJECT: Action Memorandum for a Removal Action at the Quincy Avenue Sodium Site pursuant to the On-Scene Coordinator's delegated authority under CERCLA Section 104.

FROM: Eric Sandusky, OSC
Response Section

THRU: Kerry Guy, Supervisor
Response Section

Deirdre Rothery, Manager
Emergency Management Branch

TO: Ben Bielenberg, Acting Director
Superfund and Emergency Management Division

I. Purpose

The purpose of this memorandum is to document the decision to initiate emergency response actions described herein for the Quincy Avenue Site located in Englewood, Arapahoe County, Colorado pursuant to the On-Scene Coordinator's delegated authority under CERCLA Section 104. This emergency response involved the transportation and disposal of sodium metal. Conditions existing at the Site present a threat to public health or welfare or the environment and meet the criteria for initiating a removal action under 40 CFR 300.415(b)(2) of the National Contingency Plan (NCP).

II. Site Information

A. Site Description

Site Name: Quincy Avenue Sodium
Site Spill ID (SSID): B8G5
NRC Case Number: 1371444
CERCLIS Number: CON000821224
Site Location: 2460 E Quincy Avenue, Englewood, Co
Lat/Long: 39.638, -104.957
Potentially Responsible Party (PRP):
NPL Status: Non-NPL

Removal Start Date: 06/26/2023

B. Site Background

1. Site Evaluation

South Metro Fire Department contacted EPA on 6/26/2023 with a request to dispose of an approximately 1-pound brick of sodium. The sodium was found during the clean out of a city owned building. The Fire department does not have the means to dispose of the sodium. It is covered in mineral oil and overpacked in a 2.5-gallon bucket.

2. Physical location and Site characteristics

The sodium is located within a secured facility at the South Metro Fire Department located at 2460 E Quincy Ave., Englewood, Co.

According to EPA's Environmental Justice (EJ) Screening and Mapping Tool, the data do not indicate potential areas of EJ concern at or near the Site.

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

Sodium metal is listed as a hazardous substance in 40 CFR 302.4

III. Threats to Public Health Welfare or the Environment

A. Nature of Actual or Threatened Release of Hazardous Substances, Pollutants or Contaminants.

Sodium metal is a water reactive metal which can cause the release of hydrogen gas when exposed to water. The reaction is exothermic and causes the hydrogen gas to catch fire and create small explosions. The threat of flooding and rain exacerbates the problem, and the fire department was unable to dispose of the sodium.

B. Check applicable factors (from 40 CFR 300.415) which were considered in determining the appropriateness of a removal action: EPA has considered all the factors described in 40 CFR 300.415(b)(2) of the NCP and determined that the following factors apply at the Site.

- ☒ Actual or potential exposure to nearby human populations, animals or the food chain from hazardous substances or pollutants or contaminants [300.415(b)(2)(i)].
- ☐ Actual or potential contamination of drinking water supplies or sensitive ecosystems [300.415(b)(2)(ii)].
- ☐ Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that pose a threat of release [300.415(b)(2)(iii)].
- ☐ High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface that may migrate [300.415(b)(2)(iv)].

- ☒ Weather conditions that may cause hazardous substances or pollutants to migrate or to be released [300.415(b)(2)(v)].
- ☒ Threat of fire or explosion [300.415(b)(2)(vi)].
- ☒ The availability of other appropriate federal or state response mechanisms to respond to the release [300.415(b)(2)(vii)].
- ☐ Other situations or factors that may pose threats to the public health or welfare of the United States or the environment [300.415(b)(2)(viii)].

IV. Selected Removal Action and Estimated Costs

A. Situation and Removal Activities to Date

1. Current Situation.
The sodium has been removed from the secured location by the ERRs contractor and sent to a broker for disposal.
2. Removal activities to date:
The sodium was removed from the facility on 6/26/2023.
 - a) Federal Government/Private Party
The EPA OSC and ERRs removed the sodium from the fire department's secured area for disposal on 6/26/2023 and was taken to the waste broker for disposal on 6/27/2023.
 - b) State/local
South Metro Fire Department collected and stored the sodium in a secured facility.
3. Enforcement
Where the responsible parties are known, an effort initially shall be made, to the extent practicable, to determine whether they can and will perform the necessary removal action promptly and properly.

B. Planned Removal Actions

1. Planned action description
No further removal actions are planned at this time.
2. Contribution to remedial performance
The proposed actions will, to the extent practicable, contribute to the efficient performance of any long-term remedial action at the site.
3. ARARs
Removal actions conducted under CERCLA are required to attain ARARs to the extent practicable. In determining whether compliance with ARARs is practicable, the OSC may consider appropriate factors, including the urgency of the situation and the scope of the removal action to be conducted.
4. Project Schedule

The Sodium was picked up for disposal on 6/26/2023 and dropped off at the waste broker on 6/27/2023.

C. Estimated Costs*

Contractor costs (ERRS/START staff, travel, equipment)	\$2,000
Contingency costs (20% of subtotal)	\$400
Total Removal Project Ceiling	\$2,400

*EPA direct and indirect costs, although cost recoverable, do not count toward the Removal Ceiling for this removal action. Liable parties may be held financially responsible for costs incurred by the EPA as set forth in Section 107 of CERCLA. "

V. Expected Change in the Situation Should Action Be Delayed or Not Taken

A delay in action or no action at this Site would increase the actual or potential threats to the public health and/or the environment.

VI. Outstanding Policy Issues

None

VII. Approvals

This decision document represents the selected removal action for this Site, developed in accordance with CERCLA as amended, and is not inconsistent with the National Contingency Plan. This decision is based on the administrative record for the Site.

Conditions at the site met the NCP section 300.415(b) criteria for a removal action and through this document, I am approving the proposed removal actions. The total project ceiling is \$2,400, this amount will be funded from the Regional removal allowance.

Eric Sandusky,
Federal On-Scene Coordinator

Date: