



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
5 POST OFFICE SQUARE – SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

MEMORANDUM

DATE: July 12, 2023

SUBJ: Request for a Removal Action at the Caribou Power Plant Site
Caribou, Aroostook County, Maine - **Action Memorandum**

FROM: Zach Taylor, On-Scene Coordinator
Emergency Response and Removal Section I

THRU: Edward Bazenas, Chief
Emergency Response and Removal Section I

Carol Tucker, Chief
Emergency Planning and Response Branch

TO: Bryan Olson, Director
Superfund and Emergency Management Division

I. PURPOSE

The purpose of this Action Memorandum is to request and document approval of the proposed removal action at the Caribou Power Plant Site (the Site), which is located at 142 Lower Lyndon Street in Caribou, Aroostook County, Maine. Friable asbestos and asbestos containing material (ACM) are present throughout the Site and if not addressed by implementing the response actions selected in this Action Memorandum, will continue to pose a threat to human health and the environment. There are no nationally significant or precedent-setting issues associated with this Site, and there has been no use of the On-Scene Coordinator's (OSC's) \$200,000 warrant authority.

II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID# : MEN000153672
SITE ID# : 01RV
CATEGORY : Time-Critical

A. Site Description

1. Removal site evaluation

On September 8, 2022, the U.S. Environmental Protection Agency (EPA) received a request for assistance from the Maine Department of Environmental Protection (MEDEP) to evaluate concerns related to hazardous materials and asbestos within a former power plant building complex that had been acquired by the city of Caribou due to back taxes.

EPA conducted an initial site walk on September 29, 2022 with representatives from MEDEP and the city of Caribou and initiated the Preliminary Assessment and Site Investigation (PA/SI) on November 15, 2022. MEDEP and city representatives also met with EPA at the site during the PA/SI.

Fifteen bulk samples for ACM analysis were collected as part of the PA/SI from various locations throughout several of the Site buildings. Asbestos was identified in 12 of 15 samples, with a maximum total concentration of 18%. Amosite was detected in six samples with a maximum concentration of 10% in ACM-01. Chrysotile was detected in 11 samples with a maximum concentration of 18% in ACM-04 and ACM-05. Crocidolite was detected in one sample at a concentration of 6% in ACM-06.

2. Physical location

Located at 142 Lower Lyndon Street in Caribou, Aroostook County, Maine, the Site is identified as Lot 149AA on Tax Map 25 and is owned by the city of Caribou.

Latitude: 46° 50' 52.85" North **Longitude:** 68° 00' 10.39" West

3. Site characteristics

Historic use of the 8-acre Site for power generation dates to the late 1800s with the construction of the Caribou dam and former hydroelectric plant in 1889. Construction of the diesel plant on the Site parcel followed in 1949 and operated through the early 2000s. The Site currently consists of the Caribou Generating Station Steam Plant, Diesel Plant, and outbuildings, with vacant parcels to the north and south. The buildings appear to be deteriorating and there is water on the floor throughout. The compromised roof and numerous broken windows are likely the water's points of access. There is evidence of trespassing in all the buildings. The north parcel (former electrical regulator station) is grassed, the south parcel (public boat launch) is wooded, and the yard between the Steam Plant and Diesel Plant is paved. The Steam Plant and Diesel

Plant are equipped with multiple discharge outfalls near the Aroostook River for process water (steam generation, diesel engine cooling) and facility drainage (floor drains, roof drains). The Bulk Plant is also equipped with discharge outfalls for process water (internal heating coils) and dike drainage (earthen berm).

The general surface topography of the area is flat with a steep embankment near the Aroostook River. The Site is bound by the Aroostook River and Route 1 to the east, two sets of railroad tracks to the west, and undeveloped woodlands to the north and south.

According to the EPA Region 1 ArcGIS mapping tool, within one mile of the Site are:

- 3,379 residents;
- 2 schools; and
- 1 daycare.

Based on information in EPA's EJSCREEN environmental justice screening tool none of the 13 Environmental Justice Indexes for the area within a one-mile radius of the site exceeds the 80th percentile on a national basis.

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

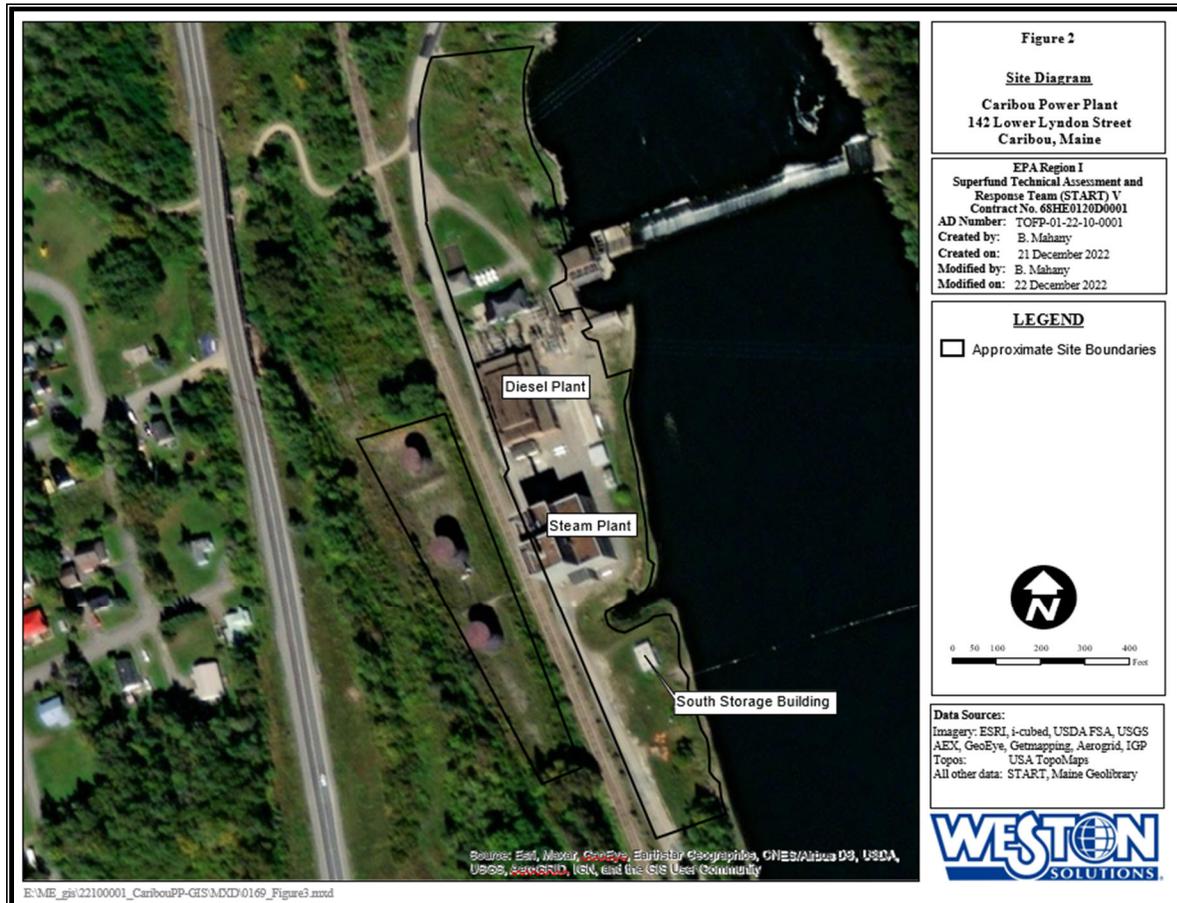
Sampling analysis by EPA determined that the presence of hazardous substances as defined by Section 101(14) of the Comprehensive Environmental Response Compensation and Liability Act (CERCLA), 42 U.S.C. §9601(14), and 40 CFR § 302.4, including but not limited to friable and potentially friable asbestos in concentrations ranging from 1% to 18%. Asbestos was found in the form of pipe insulation, transite board and floor tile.

The power plant has been inactive since 2019. During the PA/SI, water was observed to be collecting on the lower floors from leaks in the roof. Many of the structure's windows are broken or damaged and there is evidence of vandals and/or homeless persons entering the buildings. The precipitation entering through the roof has allowed asbestos-containing pipe insulation to deteriorate and fall to the floor creating a risk of exposure to anyone entering the buildings. The nearby residents and environment also risk exposure as the building continues to deteriorate allowing the migration of friable asbestos.

5. NPL status

The Site is not currently on the National Priorities List and has not received a Hazardous Ranking System rating.

6. Maps, pictures and other graphic representations



B. Other Actions to Date

1. Previous actions

MEDEP, through its contractor County Environmental Engineering, conducted a site investigation in 2021 and 2022, which is documented in the following reports:

- *Phase I Environmental Site Assessment, Caribou Power Plant, 142 Lower Lyndon Street, Caribou, Maine, August 5, 2021;*
- *Hazardous Building Materials Survey, Caribou Power Plant, 142 Lower Lyndon Street, Caribou, Maine, May 8, 2022;* and

- *Phase II Environmental Site Assessment, Caribou Power Plant, 142 Lower Lyndon Street, Caribou, Maine, May 14, 2022.*

Oil and hazardous materials detected during the MEDEP site investigation include approximately 26,000 gallons of oil, asbestos containing materials in concentrations ranging from 1.1% and 80% for Amosite and Chrysotile, polychlorinated biphenyl- (PCB) light ballasts, mercury-containing fixtures, acid-containing batteries, and several chemical and wastewater drums.

2. Current actions

There are currently no EPA actions underway.

C. State and Local Authorities' Roles

1. State and local actions to date

A Phase I Environmental Site Assessment (ESA) was conducted in 2021 for MEDEP, which included a Site visit. Several diesel and waste oil tanks and numerous drums of waste oil, transformer oil, lube oil, antifreeze, and degreaser were observed. The steam turbines and diesel engines are equipped with oil-filled operational equipment for Bunker C, diesel, turbine oil, lube oil, and waste oil. Known and suspected asbestos-containing materials, lead- and mercury-containing components, and universal and hazardous wastes were also observed. Potential ACM included thermal systems insulation, equipment components, stored materials (fire brick, pipe insulation), and building materials (surfacing material, roofing, caulking). Due to the facility's age, the potential exists for lead-based paint on buildings, equipment, tanks, and piping. Universal, hazardous, and other wastes observed include potential mercury-containing fixtures and components (switches, controls), lead batteries, laboratory and boiler treatment chemicals, and retail-sized containers of paints, solvents, and other flammables. Fire suppression systems containing per- and polyfluoroalkyl substances (PFAS) may exist at the Site.

In May 2022, a Phase II ESA was completed for MEDEP to address recognized environmental conditions identified at the Site in the Phase I ESA. Sixteen soil samples (including one duplicate), six groundwater samples (including one duplicate), and three porewater samples were collected. Petroleum and hazardous substances were detected in site soils, but below regulatory guidelines. Volatile organic compounds were not detected in soil samples above the laboratory quantitation limit. Polychlorinated biphenyls were detected in two samples at a maximum of 0.2 milligrams per kilogram (mg/kg). Volatile petroleum hydrocarbons were detected in one sample; extractable petroleum hydrocarbons were detected in multiple samples; and elevated metals (cadmium at 6.88 mg/kg, copper at 226 mg/kg, and zinc at 2,590 mg/kg) were detected, but below the MEDEP Remedial Action Guidelines for Contaminated Sites. Arsenic was detected in

multiple samples above the leaching to groundwater remedial action guidelines, at a maximum of 8.6 mg/kg, but below the undeveloped Maine background upper prediction limit. Volatile organic compounds, volatile petroleum hydrocarbons, PCBs, and priority pollutant metals were not detected in groundwater or porewater samples above the laboratory quantitation limit. Tanks, drums, oil-filled equipment, lead- and mercury-containing components, and universal and hazardous wastes were observed at the Steam and Diesel Plants, including a hazardous and universal waste storage area and flammable cabinets in the Steam Plant. A storage building contained suspect ACM insulation and fire bricks. Numerous drums of waste oil, transformer oil, lube oil, antifreeze, and degreaser were observed in the Oil Storage Building.

A Hazardous Building Materials Survey was completed in May 2022 for MEDEP, including an asbestos identification survey. Sixty-four (64) bulk samples of suspect ACM were collected from the Steam Plant, including window glazing and caulk, tar and gravel roof, asphalt shingles, ceiling tile, sheetrock, joint compound, floor tile, mastic, transite board, pipe insulation, surfacing material, interior boiler insulation, electrical wire coating, and gaskets. Twenty-four (24) bulk samples of suspect ACM were collected from the Diesel Plant, including window glazing and caulk, tar and gravel roof, ceiling tile, cementitious flooring, floor tile, and mastic. Twelve (12) bulk samples of suspect ACM, window caulk, tar, and gravel roof were collected from the diesel Pump House. Six (6) bulk samples of suspect ACM window glazing and caulk were collected from the Pump Station, Oil Storage Building, and North Storage Building. Three (3) bulk samples of suspect ACM surfacing material were collected from the interior of the Pump Station. Six (6) bulk samples of suspect ACM tar paper and asphalt shingles were collected from the Oil Tank Building. Five (5) bulk samples of suspect ACM fire brick, pipe, and block insulation were collected from the South Storage Building. Bulk samples of suspect ACM were submitted for laboratory analysis by U.S. EPA Method 600/R-93/116 using polarized light microscopy. Non-friable organically bound materials were analyzed with gravimetric preparation. Bulk samples from each homogeneous area were analyzed until a positive result was obtained or all samples tested negative for asbestos. ACM ($\geq 1\%$ asbestos) was identified at the Steam Plant, Diesel Plant, Oil Storage Building, Pump Station, diesel Pump House, and storage buildings. The estimated quantity of ACM window glazing and caulk is based on the surface area of exterior windows.

2. Potential for continued State/local response

MEDEP will assist in the removal by disposing of any petroleum products encountered during the course of the removal. The city of Caribou was recently awarded a \$900,000 brownfields grant that will be used at the site to address environmental conditions beyond the scope of this action memorandum.

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

Friable and potentially friable asbestos is the primary contaminant found at the Site that presents a release or threat of release of a hazardous substance into the environment. Other hazardous materials that present a threat of release include mercury and PCB-containing containers. Hazardous substances present pose a significant threat to public health, welfare, and the environment due to the deteriorating condition of the buildings and evidence of continual trespassing. The Site satisfies the criteria for a removal action based on the factors identified in the National Contingency Plan (NCP) at 40 CFR § 300.415(b)(2).

ASBESTOS- Exposure to asbestos occurs when the asbestos-containing material is disturbed or damaged in some way to release particles and fibers into the air. Asbestos fibers may be released into the air by the disturbance of ACM during product use, demolition work, building or home maintenance, repair, and renovation. Asbestos exposure can cause lung cancer; mesothelioma, a rare form of cancer that is found in the thin lining of the lung, chest and the abdomen and heart; and asbestosis, a serious progressive, long-term, non-cancer disease of the lungs.¹

PCBs - The most commonly observed health effects in people exposed to large amounts of PCBs are skin conditions such as acne and rashes. Studies in exposed workers have shown changes in blood and urine that may indicate liver damage. Animals that ate food containing large amounts of PCBs for short periods of time had mild liver damage and some died. Animals that ate smaller amounts of PCBs in food over several weeks or months developed various kinds of health effects, including anemia; acne-like skin conditions; and liver, stomach and thyroid gland injuries.

Other effects of PCBs in animals include changes in the immune system, behavioral alterations, and impaired reproduction. The Department of Health and Human Services (DHHS) has concluded that PCBs may reasonably be anticipated to be carcinogens. EPA and the International Agency for Research on Cancer (IARC) have determined that PCBs are probably carcinogenic to humans.²

¹ Agency for Toxic Substances and Disease Registry (ATSDR). 2000. Toxicological Profile for Polychlorinated Biphenyls (PCBs). Atlanta, GA: U.S. Department of Health and Human Services, Public Health Service

² U.S. Environmental Protection Agency: <https://www.epa.gov/asbestos/overview-asbestos-national-emission-standards-hazardous-air-pollutants-neshap>

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)];

Friable and potentially friable asbestos and ACM, in addition to other hazardous materials including mercury and PCBs, presents a hazard to public health and the environment. A mix of residential and commercial properties located near the Site creates a significant threat of exposure to nearby residents and businesses. Asbestos is a hazardous substance as defined by Section 101(14) of CERCLA, 42 U.S.C. §9601(14) and 40 C.F.R. §302.4. Friable asbestos and ACM pose an inhalation threat to local residents and those who may enter the Site. Due to the compromised condition of the buildings, friable asbestos and ACM fibers cannot be contained and may become airborne due to disturbing ACM debris by trespassers, or inclement weather due to the deteriorating condition of buildings. Due to the Site's location directly adjacent to the Aroostook River, asbestos and other hazardous materials may migrate via surface water runoff or the air into the river. A series of drainage pipes and pumps located within the buildings, which lead directly into the Aroostook River, increases the threat of release of hazardous materials which would impact the river and properties downstream.

Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers that may pose a threat of release. [§300.415(b)(2)(iii)];

Numerous drums and containers are located throughout buildings at the Site which contain hazardous materials, including mercury and PCBs. The deteriorated condition of the buildings and evidence of trespassing increases the potential for release into the environment.

Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released [§300.415(b)(2)(v)];

Friable asbestos has been found throughout the Site in a deteriorated state, in addition to other hazardous materials. Wind and/or fire can cause hazardous materials to migrate to the surrounding community. Also, weather/wearing will continue to degrade asbestos pipe insulation resulting in ACM release. Environmental conditions will continue to degrade the buildings' conditions.

Threat of fire or explosion [§300.415(b)(2)(vi)];

Evidence of people trespassing was observed during the site investigation. There is a high likelihood of an uncontrolled fire being started by a trespasser. A fire can further release asbestos and hazardous materials off-site, posing a risk to first responders, nearby residents, and the environment.

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

MEDEP has indicated that currently it does not have the necessary resources to address Site contamination therefore, MEDEP has requested EPA's assistance to mitigate the threat.

IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances or pollutants or contaminants from this Site, if not addressed by implementing the response action selected in this action memorandum, may present an imminent and substantial endangerment to public health, welfare, or the environment. In accordance with OSWER Directive 9360.0-34 (August 19, 1993), an endangerment determination is made based on "appropriate Superfund policy or guidance, or on collaboration with a trained risk assessor," which is outlined and discussed in Section III above. "Appropriate sources include, but are not limited to, relevant action level or clean-up standards, Agency for Toxic Substances and Disease Registry documents or personnel, or staff toxicologists."

In accordance with OSWER Directive 9360.0-34 (August 19, 1993), an endangerment determination is made based on "appropriate Superfund policy or guidance, or on collaboration with a trained risk assessor," which is outlined and discussed in Section III above. "Appropriate sources include, but are not limited to, relevant action level or clean-up standards for asbestos, mercury and PCBs, the Agency for Toxic Substances and Disease Registry documents or personnel, or staff toxicologists." In addition, EPA relied on the EPA National Emission Standards for Hazardous Air Pollutants 2 for determining risk with respect to asbestos at the Site.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed action description

The action required to mitigate the threats outlined herein is given below. The proposed action will protect public health, welfare, and the environment by removing the hazardous substances from accessible areas of the Site. As outlined below, the proposed action will involve the removal of asbestos and other hazardous wastes as found during this removal action.

The specific removal activities will include, but are not necessarily limited to the following:

- Conducting a site walk to assess layout and determine required equipment, personnel, and utilities;
- Developing and implementing site-specific Health and Safety Plan;
- Developing site-specific work plan providing estimates of materials, time, and costs;
- Mobilizing personnel and equipment;
- Providing site security as necessary based on conditions;
- Clearing vegetation or debris as needed to provide proper clearance and space for removal activities;

- Inventorying and documenting existing property conditions prior to starting excavation activities;
- Installing temporary fencing to prevent trespassing;
- Delineating work zones and decontamination area;
- Conducting dust-control activities, as necessary, to prevent off-site migration of ACM and dust during removal activities;
- Conducting air monitoring, as needed;
- Staging, transporting, and disposing hazardous materials;
- Conducting additional sampling and site characterization to further delineate extent of contamination and/or assist in supporting response and disposal actions, as needed;
- Repairing response-related damage, as appropriate; and
- Demobilizing resources.

2. Community relations

EPA will remain involved with the local community during the removal action through press releases, fact sheets, and public meetings, as necessary. The OSC will receive assistance from the EPA Community Involvement Coordinator to assist with all public relations activities. EPA will work closely with the state, city, local businesses, and the community.

3. Contribution to remedial performance

The cleanup proposed in this action memorandum is designed to mitigate the threats to human health and the environment posed by the Site. The actions taken will be consistent with and will not impede any future responses.

4. Description of innovative technologies and sustainable approaches

In accordance with the December 23, 2013 Memorandum, updated August 2, 2016, issued by the Office of Land and Emergency Management as well as the Region 1 Clean and Greener Policy for Contaminated Sites, greener cleanup practices should be considered for all cleanup projects. Greener cleanup is the practice of incorporating practices that minimize the environmental impacts of cleanup actions and maximize environmental and human benefit. Alternative technologies and sustainable approaches will be considered and incorporated, as appropriate, throughout the implementation of the removal action.

5. Applicable or relevant and appropriate requirements (ARARs)

Federal ARARs:

Clean Water Act, National Pollutant Discharge Elimination System (NPDES), 40 C.F.R. Parts 122 – 125; 122.26: Establishes the specifications for discharging pollutants from any point source into the waters of the U.S., and also includes storm water standards for construction sites over one acre. Removal activities will be managed to prevent stormwater discharge from the Site. To the extent water generated from the removal action needs to be discharged to the river, applicable discharge standards will be met.

Clean Water Act, 40 C.F.R. Sections 122.26(c)(ii)(C) and 122.44(k): NPDES regulations for storm water control and management.

Clean Air Act, 40 C.F.R. Part 61, 42 U.S.C. Section 112(b)(1): standards for controlling dust. The regulations establish emissions standards for 187 hazardous air pollutants. Standards set for dust and release sources. If the removal of contaminated soils generates regulated air pollutants, then measures will be implemented to meet these standards.

Clean Air Act, National Emission Standards for Hazardous Air Pollutants (NESHAPS: 40 C.F.R. § 61.151): Standards for inactive waste disposal sites that apply to asbestos mills and manufacturing and fabricating. NESHAPS standards for preventing air releases from inactive asbestos disposal sites, including cover standards, dust suppression, and land use controls.

Toxic Substances Control Act (Transport and Disposal of Asbestos Waste), 40 C.F.R. Subpart E, Appendix D: Provides standards for transport and disposal of materials that contain asbestos. Requires proper wetting and containerization. Asbestos will be managed in compliance with these standards.

Clean Water Act Section 404(b), (40 C.F.R. Parts 230 and 231, 33 C.F.R. Parts 320-323, and 33 C.F.R. Part 332): No activity that adversely affects a wetland shall be permitted if a practicable alternative with lesser impacts is available. Controls discharge of dredged or fill material to protect aquatic ecosystems. Any wetlands altered by the cleanup will be restored as required by regulatory standards.

Clean Water Act Federal Water Quality Criteria, Section 304(a), 40 C.F.R. 131.11: National Recommended Water Quality Criteria for chemicals for both the protection of human health and the protection of aquatic life; to be used as water quality monitoring standards for any work in or adjacent to wetlands or water bodies.

Floodplain Management and Protection of Wetlands, (44 C.F.R. Part 9): Regulations that set forth the policy, procedure and responsibilities to implement and enforce Executive Order 11988

(Floodplain Management) and Executive Order 11990 (Protection of Wetlands). Prohibits activities that adversely affect a federally regulated wetland unless there is no practicable alternative, and the proposed action includes all practicable measures to minimize harm to wetlands that may result from such use. Requires the avoidance of impacts associated with the occupancy and modification of federally designated 100-year and 500-year floodplain.

Fish and Wildlife Coordination (50 C.F.R. Part 297; 16 U.S.C. Section 661 et seq.): Any modification of a body of water requires consultation with the U.S. Fish and Wildlife Services and the appropriate state wildlife agency to develop measures to prevent, mitigate or compensate for losses of fish and wildlife. This requirement is addressed under CWA Section 404 requirements.

State ARARs:

Maine:

Resource Conservation and Recovery Act, Subtitle C: (40 C.F.R. Parts 260-262 and 264): Hazardous Waste Identification and Listing Regulations; Generator and Handler Requirements, Closure and Post-Closure. Maine is delegated to administer RCRA through its State statute and regulations promulgated under it. Asbestos is identified as a special waste under the Maine Hazardous Waste, Septage and Solid Waste Management Act, 38 MRSA § 1301 et seq. Statutory requirements for generating/managing hazardous and solid waste during building demolition will be complied with.

The OSC will coordinate with State officials to identify additional State ARARs, if any. In accordance with the National Contingency Plan and EPA Guidance Documents, the OSC will determine the applicability and practicability of complying with each ARAR that is identified in a timely manner.

6. Project schedule

The duration of the removal action shall be approximately six months from the day EPA mobilizes its contractor.

B. Estimated Costs

| COST CATEGORY | | CEILING |
|---|-----|-----------------------|
| <i>REGIONAL REMOVAL ALLOWANCE COSTS:</i> | | |
| ERRS Contractor | | \$1,200,000.00 |
| Interagency Agreement | | \$0,000.00 |
| <i>OTHER EXTRAMURAL COSTS NOT FUNDED FROM THE REGIONAL ALLOWANCE:</i> | | |
| START Contractor | | \$300,000.00 |
| Extramural Subtotal | | \$1,500,000.00 |
| Extramural Contingency | 20% | \$300,000.00 |
| TOTAL, REMOVAL ACTION CEILING | | \$1,800,000.00 |

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

A delayed removal action or the absence of a removal action described herein will cause conditions at the Site to remain unaddressed, and threats associated with the presence of hazardous substances will continue to pose a threat to human health and the environment.

VII. OUTSTANDING POLICY ISSUES

There are no precedent-setting policy issues associated with this Site.

VIII. ENFORCEMENT ... For Internal Distribution Only

See attached Confidential Enforcement Strategy.

The total EPA costs for this removal action that will be eligible for cost recovery are estimated to be \$1,800,000 (extramural costs) + \$200,000 (EPA intramural costs) = \$2,000,000 X 1.4912 (regional indirect rate) = **\$2,982,400**¹.

¹Direct Costs include direct extramural costs \$1,800,000 and direct intramural costs \$200,000. Indirect costs are calculated by using regional indirect rate in effect at time cost estimate is prepared and is expressed as a percentage of the 49.12% (effective January 11, 2023) x \$2,000,000, consistent with EPA’s full cost accounting methodology. 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.

IX. RECOMMENDATION

This decision document represents the selected removal action for the Caribou Power Plant Site in Caribou, ME, developed in accordance with CERCLA, as amended, and is not inconsistent with the National Contingency Plan. The basis for this decision will be documented in the Site administrative record to be established for the Site.

Conditions at the Site meet the NCP Section 300.415 (b) (2) criteria for a removal action due to the following:

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)];

Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release [§300.415(b)(2)(iii)];

Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or 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)];

I recommend that you approve the proposed removal action. The total extramural removal action project ceiling if approved will be \$1,800,000.

APPROVAL: _____

DATE: _____