UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
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BOSTON, MASSACHUSETTS 02114-2023

CONTAINS ENFORCEMENT-SENSITIVE INFORMATION

MEMORANDUM

DATE: March 22, 2007

SUBJ: Request for a Removal Action at the Wampus Milford Associates Site, Milford, New Haven County, Connecticut - **Action Memorandum**

FROM: Melanie Morash, On-Scene Coordinator
Emergency Response and Removal Section II

THRU: Steven R. Novick, Chief
Emergency Response and Removal Section II

Arthur V. Johnson III, Chief
Emergency Planning & Response Branch

TO: James T. Owens III, Director
Office of Site Remediation and Restoration

I. PURPOSE

The purpose of this Action Memorandum is to request and document approval of the proposed removal action at the Wampus Milford Associates Site, (the Site), which is located at 80 Wampus Lane in Milford, New Haven County, Connecticut. Hazardous substances present in surface soils at the Site, 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 OSC's $200,000 warrant authority.

EPA anticipates negotiating an Administrative Order on Consent with the potentially responsible parties identified for the Site. Should the parties not willingly negotiate with EPA to conduct the response actions outlined below, EPA will initiate a fund-lead removal action to address the hazardous substances present at the Site.

II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID# : CTD001453232
SITE ID# : 01CM
CATEGORY : Time Critical

A. Site Description

1. Removal site evaluation

At the request of EPA's Resource Conservation and Recovery Act (RCRA) Corrective Action Section and the Connecticut Department of Environmental Protection (CTDEP), EPA's Emergency Planning and Response Branch (EPRB) conducted a Removal Program Preliminary Assessment/Site Investigation (PA/SI) of a drainage swale and surrounding soils at the Wampus Milford Associates Site (the "Site") on December 19-20, 2006. The referral resulted from the continued failure of the property owner – Wampus Milford Associates, LLC. (WMA) – to adequately undertake required cleanup measures in the swale area that had been previously agreed upon by EPA, CTDEP, and WMA.

Sampling results from the PA/SI indicate drainage swale surface soils to be contaminated with metals (including, but not limited to, beryllium and lead), polyaromatic hydrocarbons (including, but not limited to, benzo[a]anthracene, benzo[a]pyrene, and benzo[b]fluoranthene) and petroleum hydrocarbons, at levels which exceed State of Connecticut (CT) Remediation Standards Regulations (RSRs) Industrial/Commercial (I/C) Direct Exposure Criteria (DEC) for Soil (effective January 30, 1996).

The Site Investigation was closed on March 2, 2007, with the recommendation that a time-critical removal action be conducted.

2. Physical location

The Site is a 24-acre parcel located at 80 Wampus Lane, in Milford, New Haven County, Connecticut. The geographic coordinates, as measured from the approximate center of the property, are 41° 13' 28.0" north latitude and 73° 2' 45.6" west longitude. The site consists of two lots, Lot 1 and Lot 2, as well as one on-site building. The man-made, earthen drainage swale is located on Lot 2, approximately 210 feet long by 12 feet wide, with a ponding area and weir. The swale reportedly received treated plating wastewater and stormwater run-off between 1965 and 1991. The source of these plating wastewaters included waste liquids from two on-site surface impoundments, which, together with an on-site landfill, were previously remediated by the property owner under the direct oversight of CTDEP. The swale channeled this flow to the Stubby Plain Brook, a tributary of the Indian River, which ultimately discharges into Long Island Sound.

3. Site characteristics

The Site was formerly owned and operated by the Burndy Corporation, beginning in 1956, for the manufacture of electrical components and accessories. Operations included rubber and plastic molding, operation of power presses, screw machining, degreasing, plating, wastewater treatment, soldering, assembly, and shipping. Metal hydroxide sludges from the treatment of wastes generated by electroplating were accumulated in two on-site

surface impoundments and disposed of in an on-site landfill. These areas of concern were previously remediated by the property owner under the direct oversight of CTDEP; investigation and remediation of other contamination on Lot 1 continues to be addressed by WMA under CTDEP oversight.

All outstanding stock of the Burndy Corporation was purchased by Framatome Connectors International in 1989. In 1993, all operations at the facility ceased. In 1995, the company name was changed from the Burndy Corporation to Framatome Connectors USA. In 1999, ownership of the Site was subsequently transferred to WMA.

The Site is bordered: to the east by developed parcels and undeveloped woodlands; to the west by residences and St. Mary's Church; to the south by Wampus Lane and railroad tracks, and to the north by Stubby Plain Brook. The swale continues to direct on-site drainage to Stubby Plain Brook. Seasonal and weather-related changes in water levels on-site appear to affect the volume and rate of drainage flow through the swale to the brook. The Stubby Plain Brook discharges into the Indian River, which ultimately flows into Long Island Sound.

Access to the drainage swale is unrestricted to both pedestrian and vehicular traffic. The property is currently being leased to Trans-Lite, Inc., a shipping company, and workers were observed on the property during the PA/SI. Two public schools and four private schools are located within 1 mile of the contaminated area, the nearest of which is located approximately 1,000 feet from the drainage swale. In addition, residential properties are located within 500 feet of the Site. According to the 2000 census, 130 people live within 1/4 mile of the Site, and 6,658 people are located within 1 mile of the Site.

According to the EPA Region 1 Environmental Justice Mapping Tool, the Site is not located in an environmental justice area.

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

Based on information available at this time, the principal hazardous substances or pollutants or contaminants that are being released or for which there is a threat of release include, but are not necessarily limited to, the list below. The data also show petroleum contamination to be present in drainage swale soils, co-located with the other hazardous substances detected within the drainage swale footprint.

Hazardous Substances or Pollutants or Contaminants	Media
metals (beryllium, lead)	soil
polyaromatic hydrocarbons (benzo[a]anthracene, benzo[a]pyrene, benzo[b]fluoranthene)	soil

Sampling results indicate metal, polyaromatic hydrocarbon, and petroleum hydrocarbon contamination to be present in soils at levels which exceed State of Connecticut (CT) Remediation Standards Regulations (RSRs) Industrial/Commercial (I/C) Direct Exposure Criteria (DEC) for Soil.[1]

Hazardous Substances or Pollutants or Contaminants	Highest Concentration Observed	CT RSR I/C DEC
beryllium	6.2 mg/kg[2]	2 mg/kg
lead	6,400 mg/kg	1,000 mg/kg
benzo(a)anthracene	24,000 ug/kg[3]	7,800 ug/kg
benzo(a)pyrene	21,000 ug/kg	1,000 ug/kg
benzo(b)fluoranthene	28,000 ug/kg	7,800 ug/kg
petroleum hydrocarbons[4]	15,700 mg/kg	2,500 mg/kg

5. NPL status

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

B. Other Actions to Date

1. Previous actions

Under the oversight of CTDEP and EPA's RCRA Corrective Action Section, quarterly groundwater monitoring was performed at the Site between 1984 and 1997, and semi-annual groundwater monitoring has continued since. Metal hydroxide sludges from the facility's wastewater treatment system were removed from four on-site surface impoundments in the mid-1980s and from an on-site landfill in 1997 and 2002.

2. Current actions

Remaining areas of concern on the facility portion of the property (Lot 1) continue to be addressed by the current property owner under the direct oversight of CTDEP.

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[1] State of Connecticut. Regulation of Department of Environmental Protection. *Appendix A to Sections 22a-133k-1 through 22a-133k-3 of the Regulations of Connecticut State Agencies. Direct Exposure Criteria for Soil.* Effective January 30, 1996.

[2] mg/kg = milligrams/kilogram

[3] ug/kg = micrograms/kilogram

[4] Though not a listed hazardous substance under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), sampling results from the PA/SI indicate petroleum hydrocarbon contamination to be co-located with the CERCLA hazardous substance contamination.

C. State and Local Authorities' Roles

1. State and local actions to date

In fall 2004, CTDEP requested that EPA's EPRB conduct a PA/SI at the Site due to WMA's lack of response to CTDEP's requests that a remediation of the swale be performed. Following EPRB's issuance of an access request letter to WMA on November 23, 2004 for the purposes of conducting a PA/SI, WMA's environmental attorney notified EPA that WMA had placed $250,000 in escrow to fund environmental work at the property, including an investigation and remediation of the drainage swale. Based on these developments and WMA's submittal to CTDEP and EPA of a schedule for investigation and remediation work at the Site, EPA's EPRB agreed to withdraw its request for access, contingent upon WMA's performance with respect to the drainage swale investigation.

On June 13, 2006, CTDEP issued a notice letter to WMA following continued delays, to inform WMA that there were releases of hazardous waste at the 80 Wampus Lane property that still required further investigation and remediation to ensure protection of human health and the environment. The letter included a requirement to submit to CTDEP an updated schedule for investigating and remediating the drainage swale within 30 days of receipt of the letter.

On July 20, 2006, CTDEP re-sent the June 13, 2006 letter to WMA with a cover letter requiring the submittal of an updated schedule for investigating and remediating the swale within 10 days of receipt of the letter.

On August 2, 2006 WMA sent CTDEP a letter stating that WMA did not have any additional funds to conduct the drainage swale remediation.

2. Potential for continued State/local response

CTDEP is expected to assist EPA by providing technical comments on the proposed removal action and generating a list of regulations for consideration as applicable or relevant and appropriate.

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

A. Threats to Public Health or Welfare

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 are exposed to the environment and may serve as a source of contamination to individuals who access the Site. Contaminants present in surface soils include, but are not limited to, metals (beryllium and lead), polyaromatic

hydrocarbons (benzo[a]anthracene, benzo[a]pyrene, and benzo[b]fluoranthene) and petroleum hydrocarbons. The data from the PA/SI show that the petroleum hydrocarbons detected in the drainage swale are co-mingled with the hazardous substance contamination.

Access to the Site is unrestricted to both pedestrian and vehicular traffic. The property is currently being leased to Trans-Lite, Inc., a shipping company, and workers were observed on the property during the Removal Site Investigation. Two public schools and four private schools are located within 1 mile of the contaminated area, the nearest of which is located approximately 1,000 feet from the drainage swale. In addition, residential properties are located within 500 feet of the Site. According to the 2000 census, 130 people live within 1/4 mile of the Site, and 6,658 people are located within 1 mile of the Site.

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)];

Sampling results indicate hazardous substances or pollutants or contaminants to be present in surface soils at levels which exceed State of Connecticut (CT) Remediation Standards Regulations (RSRs) Industrial/Commercial (I/C) Direct Exposure Criteria (DEC) for Soil. Soils in the drainage swale are exposed and sparsely vegetated, increasing the threat due to migration.

Hazardous substances or pollutants or contaminants found at the Site that pose a threat to public health or welfare include beryllium, lead, polyaromatic hydrocarbons (benzo[a]anthracene, benzo[a]pyrene, and benzo[b]fluoranthene), and co-mingled petroleum hydrocarbons. Specific information on these substances is presented below:

Beryllium is a hard, grayish metal naturally found in mineral rocks, coal, soil, and volcanic dust. Beryllium ores are used to make specialty ceramics for electrical and other technology applications, and beryllium alloys are used in automobiles, computers, and sports equipment. People working in industries where beryllium is mined, processed, machined, or converted into metal, alloys, and other chemicals may be exposed to high levels of beryllium. People living near these industries may also be exposed to higher than normal levels of beryllium in air. Beryllium can cause lung damage if breathed in. If beryllium air levels are high enough an acute condition can result called acute beryllium disease, which resembles pneumonia. An inflammatory reaction in the respiratory system is also possible, called chronic beryllium disease. This disease causes weakness and fatigue and can result in difficulty in breathing. It can also result in anorexia, weight loss, and may also lead to right side heart enlargement and heart disease. Long term exposure to beryllium can increase the risk of developing lung cancer. The Department of Health and Human Services (DHHS) has determined that beryllium is a human carcinogen.[5]

[5] Agency for Toxic Substances and Disease Registry (ATSDR), U.S. Department of Health and Human Services (DHS), Public Health Service (PHS). January 18, 2007. *ToxFAQs for Beryllium.* Available at http://www.atsdr.cdc.gov/tfacts4.html Internet, accessed March 13, 2007.

Lead is a naturally occurring bluish-gray metal found in small amounts in the earth's crust. Lead is used in the production of batteries, ammunition, metal products, paints, and devices to shield X-rays. Exposure to lead can occur from breathing contaminated air or dust, eating contaminated foods, or drinking contaminated water. Children can be exposed from eating lead-based paint chips or playing in contaminated soil. The central nervous system is the organ system most affected in humans upon exposure to high levels of lead. Lead also damages kidneys and the reproductive system, decreases reaction time, causes weakness and fatigue, and may cause anemia, a disorder of the blood. DHHS has determined that lead acetate and lead phosphate may reasonably be anticipated to be carcinogens based on studies in animals.[6]

Polycyclic aromatic hydrocarbons (PAHs) are a group of over 100 different chemicals that are formed during the incomplete burning of coal, oil and gas, garbage, or other organic substances like tobacco or charbroiled meat. PAHs are usually found as a mixture containing two or more of these compounds, such as soot. PAHs are found in coal tar, crude oil, creosote, and roofing tar, but a few are used in medicines or to make dyes, plastics, and pesticides. Exposure to PAHs can happen by breathing contaminated air in the workplace or by coming in contact with air, water, or soil near hazardous waste sites. Nursing infants of mothers living near hazardous waste sites may be exposed to PAHs through their mother's milk. DHHS has determined that some PAHs may reasonably be expected to be carcinogens.[7]

Total petroleum hydrocarbons (TPH) is a term used to describe a large family of several hundred chemical compounds that originally come from crude oil. Some chemicals that may be found in TPH are hexane, jet fuels, mineral oils, benzene, toluene, xylenes, naphthalene, and fluorene, as well as other petroleum products and gasoline components. Exposure to TPH may result from touching soil contaminated with TPH or living in an area or near a spill or leak of petroleum products. Exposure to TPH compounds can affect the central nervous system, blood, immune system, lungs, skin, and eyes. The International Agency for Research on Cancer (IARC) has determined that one TPH compound (benzene) is carcinogenic to humans. IARC has also determined that other TPH compounds (benzo[a]pyrene and gasoline) are probably and possibly carcinogenic to humans.[8]

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

The 210 feet long swale continues to direct on-site drainage to the Stubby Plain Brook. Seasonal and weather-related changes in water levels on-site appear to affect the volume and rate of

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[6] Agency for Toxic Substances and Disease Registry (ATSDR), U.S. Department of Health and Human Services (DHS), Public Health Service (PHS). January 18, 2007. *ToxFAQs for Lead.* Available at http://www.atsdr.cdc.gov/tfacts13.html Internet, accessed March 13, 2007.

[7] Agency for Toxic Substances and Disease Registry (ATSDR), U.S. Department of Health and Human Services (DHS), Public Health Service (PHS). February 7, 2007. *ToxFAQs for Polycyclic Aromatic Hydrocarbons* . Available at http://www.atsdr.cdc.gov/tfacts69.html Internet, accessed March 13, 2007.

[8] Agency for Toxic Substances and Disease Registry (ATSDR), U.S. Department of Health and Human Services (DHS), Public Health Service (PHS). January 2007. *ToxFAQs for Total Petroleum Hydrocarbons.* Available at http://www.atsdr.cdc.gov/tfacts123.html Internet, accessed March 13, 2007.

drainage flow through the swale to the brook, a tributary of the Indian River, which ultimately discharges into Long Island Sound. Fluid flow through the swale system may act as a pathway for contaminants to migrate off-site and enter the Indian River and Long Island Sound water systems.

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

Neither state nor local authorities have the resources to remove the contaminants present at the Site at this time.

B. Threats to the Environment

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 are exposed to the environment and may serve as a source of contamination to wildlife that access the Site. The Site is bordered to the east by undeveloped woodlands and to the north by the Stubby Plain Brook, a tributary of the Indian River and Long Island Sound. Fluid flow through the swale system may result in potential exposure of downstream receptors to contamination present in the drainage swale.

Actual or potential contamination of drinking water supplies or sensitive ecosystems; [§300.415(b)(2)(ii)];

Hazardous substances or pollutants or contaminants located in surface soils may be transported via surface water runoff to the Stubby Plain Brook, which borders the Site to the north. Fluid flow through the swale system may act as a pathway for contaminants to migrate off-site and enter the Indian River and Long Island Sound. The Long Island Sound is an estuary system with an area of approximately 1,320 square miles, which provides habitat to more than 120 species of fish and a variety of birds and animals. More than 8 million people live in the Long Island Sound watershed; recreational activities on and along the Sound contribute an estimated $5.5 billion per year to the regional economy.[9]

IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances 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, or welfare, or the environment.[10]

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[9] State of Connecticut Department of Environmental Protection. 2007. *Long Island Sound.* Available at http://www.ct.gov/dep/cwp/view.asp?a=2705&q=323790&depNav_GID=1635&depNav=|, Internet, accessed March 2, 2007.

[10] In accordance with EPA Office of Solid Waste and Emergency Response (OSWER) Directive 9360.0-34, an endangerment determination is made based on "relevant action level or clean-up standards" promulgated by the federal government or the applicable state.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed action description

EPA is negotiating with the Potentially Responsible Parties (PRPs) – Wampus Milford Associates, LLC. and Framatome Connectors USA, Inc. – to conduct PRP-lead removal actions at the Site. EPA is prepared to conduct a fund-lead cleanup to address any portion(s) of the required remedy unaddressed by the PRPs.

The scope of the proposed removal action includes:

1) Take measures to prevent unauthorized access to the Site. These activities may include repairing or installing additional security fencing and posting appropriate signage;

2) Clear on-site vegetation and debris as needed to make room for Site activities;

3) Conduct erosion-control and dust suppression activities as needed;

4) Conduct air monitoring activities as appropriate;

5) Collect and analyze samples as needed to further characterize the horizontal and vertical extent of contamination in the drainage swale and surrounding soils;

6) Excavate and consolidate contaminated surface soils within and surrounding the drainage swale;

7) Collect and analyze post-excavation confirmatory samples;

8) Backfill excavations with clean fill materials;

9) Package, stage, and remove contaminated materials for off-site disposal at EPA-approved disposal facilities; and

10) Repair response-related damage to areas disturbed by site activities.

2. Community relations

EPA will continue to coordinate with the City of Milford and CTDEP to prepare and implement a community involvement plan for removal actions at the Site.

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 at the Site would be consistent with and will not impede any future responses.

4. Description of alternative technologies

At this time, no alternative cleanup technologies are proposed for the removal action at the Site.

5. Applicable or relevant and appropriate requirements (ARARs)

Federal ARARs:

29 CFR Parts 1910, 1926, and 1904: OSHA Health and Safety Regulations

40 CFR Part 262: Standards Applicable to Generators of Hazardous Waste:

Subpart B - The Manifest
262.20 : General requirements for manifesting
262.21 : Acquisition of manifests
262.22 : Number of copies of manifests
262.23 : Use of the manifest

Subpart C - Pre-Transport Requirements
262.30 : Packaging
262.31 : Labeling
262.32 : Marking

Subpart D - Recordkeeping and Reporting
262.40 : Recordkeeping

40 CFR Part 264: Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities:

Subpart I - Use and Management of Containers

264.171 : Condition of containers
264.172 : Compatibility of waste with containers
264.173 : Management of containers
264.174 : Inspections
264.175 : Containment
264.176 : Special requirements for ignitable or reactive waste
264.177 : Special requirements for incompatible wastes

40 CFR Part 264: Hazardous Waste Regulations - RCRA Subtitle C:

268-270 : Hazardous and Solid Waste Amendments Land Disposal Restrictions Rule

40 CFR Part 300.440: Procedures for Planning and Implementing Off-Site Response Actions (Off-Site Rule)

49 CFR Parts 171-179: Department of Transportation Regulations for Transport of Hazardous Materials

State ARARs:

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 which is identified in a timely manner.

6. Project schedule

Work is schedule to begin within the next eight weeks, pending the outcome of ongoing negotiation with the PRPs.

The duration of on-site activities is not expected to exceed nine months from the time they begin, weather permitting.

B. Estimated Costs

COST CATEGORY		CEILING
REGIONAL REMOVAL ALLOWANCE COSTS[11]		
ERRS[12] Contractor		$200,000.00
Interagency Agreement		$ 0.00
OTHER EXTRAMURAL COSTS NOT FUNDED FROM THE REGIONAL ALLOWANCE		
START[13] Contractor		$100,000.00
Extramural Subtotal		$300,000.00
Extramural Contingency	20%	$60,000.00
TOTAL, REMOVAL ACTION CEILING		**$360,000.00**

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

Delayed action will increase risks to human health and/or the environment from hazardous substances present at the Site. Conditions at the Site may be expected to remain unaddressed, and risks associated with the presence of hazardous substances will continue to pose a threat of release if the actions detailed in this Action Memorandum are not implemented.

VII. OUTSTANDING POLICY ISSUES

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

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[11] This cost will be driven by the selected option (s). Should longer term options need to be implemented, additional funding may be required.
[12] ERRS = Emergency and Rapid Response Services
[13] START = Superfund Technical Assessment and Response Team

VIII. ENFORCEMENT ... For Internal Distribution Only ... See attached Enforcement Strategy

The total EPA costs for this removal action based on full-time accounting practices that will be eligible for cost recovery are estimated to be $360,000.00 (extramural costs) + $100,000.00 (EPA intramural costs) = $460,000.00 X 1.33 (regional indirect rate) = **$611,800.00**. [14]

IX. RECOMMENDATION

This decision document represents the selected removal action for the Wampus Milford Associates Site in Milford, Connecticut, developed in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended, and is not inconsistent with the National Contingency Plan (NCP). The basis for this decision will be documented in the 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)];

Actual or potential contamination of drinking water supplies or sensitive ecosystems [§300.415(b)(2)(ii)];

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 or contaminants to migrate or be released;[§300.415(b)(2)(v)]; and

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 removal action project ceiling if approved will be $360,000.00.

APPROVAL: _____ DATE: 3 26 07

DISAPPROVAL: _____ DATE: _____

[14] Direct costs include direct extramural costs [$360,000.00] and direct intramural costs [$100,000.00]. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of site specific costs [33% x $460,000.00], consistent with the full accounting methodology effective October 2, 2000. These estimates do not include pre-judgement 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.