

**U. S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION REPORT No. 2**

**Date:** September 11, 2004

**Subject:** BCX Tank Site  
Jacksonville, Duval County, Florida

**From:** Terry Stilman, OSC, U.S. EPA Region 4  
Emergency Response and Removal Branch

**To:** U.S. EPA Region 4 Regional Response Center for Distribution

**I. BACKGROUND**

<b>Site No:</b> A4FE	<b>Delivery Order No:</b> N/A
<b>CERCLIS No:</b> FLD982104761	<b>DO Amount:</b> N/A
<b>Response Authority:</b> CERCLA, Fund Lead	<b>Contractor:</b> WRS
<b>Completion Date:</b> Activities On-going	<b>NPL Status:</b> Non-NPL
<b>Start Date:</b> 7/1/04	<b>Personnel on-site:</b> EPA-1, ERRS-3, USCG GST - 1, START - 1

See Polrep number 1 for a detailed background description.

**II. PRESENT SITUATION (September 1 - September 11):**

- On September 1, 2004, disposal activities began. ERRS is loading tank trucks for transport to Waste Management's Folkston, Georgia and Jacksonville, Florida facilities. Each tank truck has a 5,500 gallon capacity. An estimated 2,000,000 gallons of waste water are on-site as of September 1, 2004. EPA and USCG GST on-site.
- On September 3, 2004 the Site was temporarily shut down in anticipation of Hurricane Frances. Disposal activities were restarted on September 7, 2004. USCG GST remained in the area to monitor the Site.
- As of September 11, 2004 approximately 160,000 gallons of waste water have been shipped off-site. USCG GST and START remain on-site to assist with contractor monitoring.

### III. COSTS TO DATE (estimated)

	<u>Costs</u>	<u>Ceiling</u>
USCG - GST	5,000	10,000
START	5,000	25,000
ERRS - WRS	<u>75,000</u>	<u>900,000</u>
Total	85,000	935,000

### III. FUTURE ACTIONS

1. ERRS to increase the number of tank truck loads per day leaving the Site to 20 from the present 10, after Hurricane Ivan makes landfall.
2. START to conduct soil sampling outside of the secondary containment.

**U. S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION REPORT No. 3**

**Date:** September 21, 2004

**Subject:** BCX Tank Site  
Jacksonville, Duval County, Florida

**From:** Terry Stilman, OSC, U.S. EPA Region 4  
Emergency Response and Removal Branch

**To:** U.S. EPA Region 4 Regional Response Center for Distribution

**I. BACKGROUND**

<b>Site No:</b> A4FE	<b>Delivery Order No:</b> N/A
<b>CERCLIS No:</b> FLD982104761	<b>DO Amount:</b> N/A
<b>Response Authority:</b> CERCLA, Fund Lead	<b>Contractor:</b> WRS
<b>Completion Date:</b> Activities On-going	<b>NPL Status:</b> Non-NPL
<b>Start Date:</b> 7/1/04	<b>Personnel on-site:</b> EPA-1, ERRS-3, USCG GST - 1, START - 1

See Polrep number 1 for a detailed background description.

**II. PRESENT SITUATION (September 12 - September 21):**

- Disposal activities continue. Due to heavy rains in the area from recent tropical systems, the selected disposal facilities have been slow to restart operations. To increase the amount of waste water transported off-site per day for disposal, WRS has sub-contracted with additional disposal facilities.
- ERRS is loading tank trucks for transport to Florida and Georgia disposal facilities. Each tank truck has a 5,500 gallon capacity. An estimated 2,000,000 gallons of waste water were on-site as of September 1, 2004. EPA and USCG GST on-site.

- As of September 21, 2004 estimated disposal:

Waste Management	436,600 gallons
Environmental Outsource	242,000 gallons
Greenleaf	44,000 gallons
<b>Total</b>	<b>722,600 gallons</b>

### **III. COSTS TO DATE (estimated)**

	<u>Costs</u>	<u>Ceiling</u>
USCG - GST	7,000	10,000
START	5,000	25,000
ERRS - WRS	<u>266,457</u>	<u>900,000</u>
Total	278,457	935,000

### **III. FUTURE ACTIONS**

1. START to conduct soil sampling outside of the secondary containment.

**U. S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION REPORT No. 4**

**Date:** September 30, 2004

**Subject:** BCX Tank Site  
Jacksonville, Duval County, Florida

**From:** Terry Stilman, OSC, U.S. EPA Region 4  
Emergency Response and Removal Branch

**To:** U.S. EPA Region 4 Regional Response Center for Distribution

**I. BACKGROUND**

<b>Site No:</b> A4FE	<b>Delivery Order No:</b> N/A
<b>CERCLIS No:</b> FLD982104761	<b>DO Amount:</b> N/A
<b>Response Authority:</b> CERCLA, Fund Lead	<b>Contractor:</b> WRS
<b>Completion Date:</b> Activities On-going	<b>NPL Status:</b> Non-NPL
<b>Start Date:</b> 7/1/04	<b>Personnel on-site:</b> EPA-1, ERRS-3, USCG GST - 1, START - 1

See Polrep number 1 for a detailed background description.

**II. PRESENT SITUATION (September 21 - September 27):**

- Disposal activities have been halted due to heavy rains from recent tropical systems. To increase the amount of waste water transported off-site per day for disposal, WRS has sub-contracted with additional disposal facilities.
- ERRS is loading tank trucks for transport to Florida and Georgia disposal facilities. Each tank truck has a 5,500 gallon capacity. An estimated 2,000,000 gallons of waste water were on-site as of September 1, 2004. EPA and USCG GST on-site.
- As of September 21, 2004 estimated disposal:

Waste Management	464,100 gallons
Environmental Outsource	352,000 gallons
Greenleaf	66,000 gallons
<b>Total</b>	<b>882,100 gallons</b>

### III. COSTS TO DATE (estimated)

	<u>Costs</u>	<u>Ceiling</u>
USCG - GST	7,000	10,000
START	8,000	25,000
ERRS - WRS	<u>265,457</u>	<u>900,000</u>
Total	280,457	935,000

### III. FUTURE ACTIONS

1. START to conduct soil sampling outside of the secondary containment.
2. The Site to be re-started by October 20, 2004.

**U. S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION REPORT No. 5**

**Date:** October 21, 2004

**Subject:** BCX Tank Site  
Jacksonville, Duval County, Florida

**From:** Terry Stilman, OSC, U.S. EPA Region 4  
Emergency Response and Removal Branch

**To:** U.S. EPA Region 4 Regional Response Center for Distribution

**I. BACKGROUND**

<b>Site No:</b> A4FE	<b>Delivery Order No:</b> N/A
<b>CERCLIS No:</b> FLD982104761	<b>DO Amount:</b> N/A
<b>Response Authority:</b> CERCLA, Fund Lead	<b>Contractor:</b> WRS
<b>Completion Date:</b> Activities On-going	<b>NPL Status:</b> Non-NPL
<b>Start Date:</b> 7/1/04	<b>Personnel on-site:</b> EPA-1, ERRS-5, USCG GST - 1, START - 1

See Polrep number 1 for a detailed background description.

**II. PRESENT SITUATION (September 27 - October 21):**

- Disposal activities have been halted due to heavy rains from recent tropical systems. To increase the amount of waste water transported off-site per day for disposal, WRS has sub-contracted with additional disposal facilities. Activities were restarted on October 18, 2004.
- ERRS is loading tank trucks for transport to Florida and Georgia disposal facilities. Each tank truck has a 5,500 gallon capacity. An estimated 2,000,000 gallons of waste water were on-site as of September 1, 2004. EPA and USCG GST on-site.

- As of October 21, 2004 estimated disposal:

Waste Management	497,081 gallons
Environmental Outsource	366,800 gallons
Greenleaf	78,000 gallons
<b>Total</b>	<b>941,881 gallons</b>

### **III. COSTS TO DATE (estimated)**

	<u>Costs</u>	<u>Ceiling</u>
USCG - GST	6,000	10,000
START	10,000	25,000
ERRS - WRS	<u>352,600</u>	<u>900,000</u>
Total	368,600	935,000

### **III. FUTURE ACTIONS**

1. START to conduct sampling of soil, groundwater and sediment outside of the secondary containment, after review of the sampling plan by FDEP and the EPA Site Evaluation Section.
2. Waste water and waste sludge to be transported off-site for disposal.
3. FDEP-BER, EPA and the City of Jacksonville to meet to discuss the scope of EPA's removal action.



**U. S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION REPORT No. 6**

**Date:** October 28, 2004

**Subject:** BCX Tank Site  
Jacksonville, Duval County, Florida

**From:** Terry Stilman, OSC, U.S. EPA Region 4  
Emergency Response and Removal Branch

**To:** U.S. EPA Region 4 Regional Response Center for Distribution

**I. BACKGROUND**

<b>Site No:</b> A4FE	<b>Delivery Order No:</b> N/A
<b>CERCLIS No:</b> FLD982104761	<b>DO Amount:</b> N/A
<b>Response Authority:</b> CERCLA, Fund Lead	<b>Contractor:</b> WRS
<b>Completion Date:</b> Activities On-going	<b>NPL Status:</b> Non-NPL
<b>Start Date:</b> 7/1/04	<b>Personnel on-site:</b> EPA-1, ERRS-4, USCG GST - 1, START - 1

See Polrep number 1 for a detailed background description.

**II. PRESENT SITUATION (October 21 - October 28):**

- Disposal activities continue. ERRS is loading tank trucks with waste water for transport to Florida and Georgia disposal facilities. Each tank truck has a 5,500 gallon capacity. An estimated 2,000,000 gallons of waste water were on-site as of September 1, 2004. EPA and USCG GST on-site.

- As of October 27, 2004 estimated disposal:

Waste Management	570, 181 gallons
Environmental Outsource	443,500 gallons
Greenleaf	114,400 gallons

Total	1,128,081 gallons
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**III. COSTS TO DATE (estimated)**

	<u>Costs</u>	<u>Ceiling</u>
USCG - GST	7,000	10,000

START	14,000	25,000
ERRS - WRS	<u>501,380</u>	<u>900,000</u>
Total	522,380	935,000

### III. FUTURE ACTIONS

1. START to conduct sampling of soil, groundwater and sediment outside of the secondary containment during the week of 11/08/04.
2. Waste water and waste sludge to be transported off-site for disposal. ERRS to begin set-up of sludge solidification and off-site transport operation during the week of 11/01/04.
3. FDEP-BER, EPA and the City of Jacksonville to meet to discuss the scope of EPA's removal action.

**U. S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION REPORT No. 7**

**Date:** November 20, 2004

**Subject:** BCX Tank Site  
Jacksonville, Duval County, Florida

**From:** Terry Stilman, OSC, U.S. EPA Region 4  
Emergency Response and Removal Branch

**To:** U.S. EPA Region 4 Regional Response Center for Distribution

**I. BACKGROUND**

<b>Site No:</b> A4FE	<b>Delivery Order No:</b> N/A
<b>CERCLIS No:</b> FLD982104761	<b>DO Amount:</b> N/A
<b>Response Authority:</b> CERCLA, Fund Lead	<b>Contractor:</b> WRS
<b>Completion Date:</b> Activities On-going	<b>NPL Status:</b> Non-NPL
<b>Start Date:</b> 7/1/04	<b>Personnel on-site:</b> EPA-1, ERRS-4, USCG GST - 1, START - 1

See Polrep number 1 for a detailed background description.

**II. PRESENT SITUATION (October 28 - November 20):**

- Disposal activities continue. ERRS is loading tank trucks with waste water for transport to Florida and Georgia disposal facilities. Each tank truck has a 5,500 gallon capacity. ERRS is also loading sludge for off-site disposal to a Georgia disposal facility. Sludge is pumped from the tanks to roll-offs and then solidified to allow for transport. An estimated 2,000,000 gallons of waste water were on-site as of September 1, 2004. EPA and USCG GST on-site.
- As of November 20, 2004 estimated disposal:

Waste Water	1,187,081 gallons
Waste Sludge	941 tons
Sludge and liquid estimate total	1,408,591 gallons

**III. COSTS TO DATE (estimated)**



	<u>Costs</u>	<u>Ceiling</u>
USCG - GST	9,000	10,000
START	14,000	25,000
ERRS - WRS	<u>789,679</u>	<u>900,000</u>
Total	812,679	935,000

### III. FUTURE ACTIONS

1. START to conduct sampling of soil, groundwater and sediment outside of the secondary containment during the week of 12/05/04.
2. Waste water and waste sludge to be transported off-site for disposal. Site operations to be halted during Thanksgiving Holiday.
3. FDEP-BER, EPA and the City of Jacksonville to meet to discuss the scope of EPA's removal action.

U. S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION REPORT No. 8

SITE: BCX Tank  
BREAK: 2.10  
OWNER: V. 1

**Date:** December 2, 2004  
**Subject:** BCX Tank Site  
Jacksonville, Duval County, Florida  
**From:** Terry Stilman, OSC, U.S. EPA Region 4  
Emergency Response and Removal Branch  
**To:** U.S. EPA Region 4 Regional Response Center for Distribution

**I. BACKGROUND**

**Site No:** A4FE  
**CERCLIS No:** FLD982104761  
**Response Authority:** CERCLA, Fund Lead  
**Completion Date:** Activities On-going  
**Start Date:** 7/1/04

**Delivery Order No:** N/A  
**DO Amount:** N/A  
**Contractor:** WRS  
**NPL Status:** Non-NPL  
**Personnel on-site:** EPA-1, ERRS-4,  
USCG GST - 1, START - 1

See Polrep number 1 for a detailed background description.

**II. PRESENT SITUATION (November 21 - December 02):**

- Disposal activities were halted during the Thanksgiving Holiday and re-started on November 29, 2004. ERRS is loading tank trucks with waste water for transport to Florida and Georgia disposal facilities. Each tank truck has a 5,500 gallon capacity. ERRS is also loading sludge for off-site disposal to a Georgia disposal facility. Sludge is pumped from the tanks to roll-offs and then solidified to allow for transport. An estimated 2,000,000 gallons of waste water were on-site as of September 1, 2004. EPA and USCG GST on-site.
- EPA, Florida DEP and the City of Jacksonville met on-site to discuss the final Site conditions. Disposal operations are expected to be complete by December 15, 2004. Site demobe, including completion of sampling activities is expected by the end of December.
- As of December 01, 2004 estimated disposal:

Waste Water	1,198,081 gallons
Waste Sludge	1031 tons



10445671

Sludge and liquid estimate  
total 1,440,768 gallons

**III. COSTS TO DATE (estimated)**

	<u>Costs</u>	<u>Ceiling</u>
USCG - GST	9,000	20,000
START	14,000	25,000
ERRS - WRS	<u>796,525</u>	<u>1,000,000</u>
Total	819,525	1,045,000

**III. FUTURE ACTIONS**

1. START to conduct sampling of soil, groundwater and sediment outside of the secondary containment during the week of 12/13/04.
2. Waste water and waste sludge to be transported off-site for disposal.
3. FDEP, EPA and the City of Jacksonville to review data received from the planned sampling event.

**U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLREP 9# AND FINAL**

**DATE:** 30-DEC-04

**FROM:** Terry Stilman, On-Scene Coordinator  
ERRB-Region 4

**TO:** Regional Response Center  
EPA HQ Regional Coordinator  
Site File  
Branch File  
Office of Public Affairs  
FLDEP  
EPA Contracting Officer  
EPA Cost Recovery Section  
EPA Community Relations Coordinator  
EAD Office of Legal Support

**I. GENERAL SITE INFORMATION**

<b>Site Name:</b>	BCX Tank Site
<b>Street Address:</b>	1903 East Adams Street
<b>City, County, State, Zip Code:</b>	Jacksonville, Duval County, Florida 32202
<b>Site Number:</b>	A4FE
<b>Response Authority:</b>	CERCLA
<b>NPL Status:</b>	Non-NPL
<b>Incident Category:</b>	Emergency Time-Critical
<b>State Notification:</b>	Florida Department of Environmental Protection
<b>Memorandum:</b>	Emergency Response Action Memorandum issued on June 21, 2004. Additional Funding Request signed on 16 August 2004 Total removal project ceiling \$1,492,000
<b>Start Date:</b>	21 June 2004
<b>Completion Date:</b>	30 December 2004

**II. BACKGROUND INFORMATION**

**Type of facility or Site:** Former waste oil and industrial waste water treater.

**Site description:** In July 1987, International Processing Specialists (IPS) leased the property to operate a waste water facility. In 1991, IPS began used oil processing. In September of 1995 an explosion at its 630,000 gallons used oil storage tank caused the death of one of IPS's employees. As a result of the explosion, FDEP conducted an inspection of the facility. In May

of 1996, FDEP entered into a Consent Order with IPS that required IPS to upgrade its facility and allow it to continue to operate the used oil processing facility until it completed a permit application. FDEP issued a permit in 1997 to IPS to operate as a used oil processing facility. After sending several letters to the facility regarding non-compliance, in 1999 FDEP issued an Intent to Deny IPS's permit modification request, to accept and process Petroleum Contact Water at the IPS facility. In May of 2000, FDEP filed a Civil Complaint to compel compliance, prohibit receipt of used oil or wastewater by the facility, revoke the permit, and collect penalties. In May of 2002, FDEP issued a Final Order to revoke IPS's Used Oil Processor permit.

In 2001, BCX became the new owner of the facility. Between 2001 and June of 2004, FDEP and the City of Jacksonville have attempted to force IPS and BCX to remove waste and close the facility. In 2001, the facility removed equipment, containers and associated piping in a process area and demolished the process building. No waste was removed from the tanks.

In June of 2004, an inspector with the City of Jacksonville's Tanks Program discovered an accumulation of wastewater in the secondary containment area and that a crack in the containment wall was allowing waste to leak to the environment. FDEP confirmed the City's findings and contacted BCX. No action was taken by BCX. On June 11, 2004 the City of Jacksonville obtained an emergency Temporary Injunction ordering BCX, IPS, related companies, and real property owners to remove waste from the secondary containment within 1 week, sample wells within 3 weeks, remove all waste from the tanks within 3 months, and to remediate contamination and provide financial assurance. No action was taken.

### **III. RESPONSE INFORMATION**

**A. Actions Taken:** On June 21, 2004, OSC Stilman mobilized to the BCX Tank Site along with the Florida Department of Environmental Protection, Bureau of Emergency Response personnel to conduct a removal site evaluation. While conducting a reconnaissance of the site, OSC Stilman discovered approximately fifteen abandoned tanks on the Site, adjacent to a public road. The tanks were located within a concrete secondary containment wall that showed signs of past leakage. The secondary containment also held over two feet of waste water from various tank leaks and area rain. During the assessment OSC Stilman observed on-going leaks from cracks in the secondary containment wall. The largest tank was reported to have a capacity of 600,000 gallons. The tanks and waste in the secondary containment were suspected to contain industrial waste water and waste oil. The specific contents of the tanks were unknown at the time, but a past explosion and fire at one of the tanks occurred at the facility resulting in the death of an employee. Based on this past incident, the contents of the tanks were believed to contain waste that exhibited hazardous characteristics under RCRA (ie. Flammability). The waste at the facility was considered CERCLA hazardous substances and OSC Stilman initiated an emergency response and established a Site ceiling of \$250,000.

EPA's Emergency Response and Removal Services (ERRS) contractor, WRS, arrived on-scene to assist with stabilization of the secondary containment wall. FDEP and the City of Jacksonville began regular patrols of the facility. On June 28, 2004 EPA, the USCG Strike Team and WRS



pumped approximately 100,000 gallons of waste water into temporary tanks staged adjacent to the facility. This relieved pressure on the secondary containment walls and reduced the amount of waste water leaking through cracks in the wall. Sampling of the tanks was also conducted.

Analytical results indicated the presence of benzene, tetrachloroethene and naphthalene as well as other contaminants in high levels in the waste water and sludge in the tanks and secondary containment. Approximately 2 million gallons of waste water and sludge were found on-site.

On September 1, 2004, disposal activities began. Waste was loaded into tank trucks for transport to Waste Management's Folkston, Georgia and Jacksonville, Florida facilities. Each tank truck has a 5,500 gallon capacity.

On September 3, 2004 the Site was temporarily shut down in anticipation of Hurricane Frances. Disposal activities were restarted on September 7, 2004. To increase the amount of waste water transported off-site per day for disposal, ERRS sub-contracted additional disposal facilities.

On October 28, 2004 ERRS began the load out of pumpable sludge for off-site disposal to a Georgia disposal facility. Sludge was pumped from the tanks to roll-offs and then solidified to allow for transport.

Disposal activities were halted during the Thanksgiving Holiday and re-started on November 29, 2004. ERRS continued loading out of tank trucks with waste water for transport to Florida and Georgia disposal facilities. ERRS also continued the loading of sludge for off-site disposal to a Georgia disposal facility. By completion of the disposal, all pumpable sludge and free liquids have been shipped off-site for disposal. Finally, those tanks with large holes were sealed to prevent rainwater from entering and mixing with the non-pumpable sludge. Given the poor condition of all the tanks, any free liquid in the tanks would most likely leak out through the bottom and sides of the tanks.

On December 30, 2004 on-site activities were complete.

**B. Use of Innovative Technologies or Authorities:** Not applicable.

**C. Community Involvement:** OSC Stilman responded to inquiries from parties that visited the Site or telephoned. The Site is within sight of the All-Tel stadium.

**D. Unusual Circumstances.** None

**E. Future Considerations.** In December 2004, EPA conducted additional sampling of soils on the former facility property, adjacent to the secondary containment wall. During rain events waste was noted emanating from the ground in this location. Subsequent to that sampling event, EPA learned that this area adjacent to the secondary containment is subject to a comprehensive soil excavation and groundwater dewatering operation through a State of Florida FLDEP UST program. This is due to a past spill on a property adjacent to the BCX tank Site that has impacted groundwater at the Site. The results of EPA's sampling event will be forwarded to FLDEP to

prepare for the FLDEP clean-up.

**F. Post Removal Site Control.** None required.

#### **IV CONTRACTOR INFORMATION AND ESTIMATED COSTS**

##### **A. Contractor Information.**

<b>CONTRACTOR</b>	<b>Contract NUMBER</b>	<b>P.O.P. START</b>	<b>P.O.P. END</b>	<b>D.O. AMOUNT</b>
WRS	0206-F4-0019	21 JUN 04	28 APR 05	\$ 1,100,000
START	4W-04-08-B-002	18 AUG 04	04 APR 05	\$ 30,120
USCG				\$ 20,000
TOTAL				\$ 1,150,120

**B. Estimated Costs.** Costs shown below are based upon data available to OSC at the time this report was prepared. These figures should not be used to support legal actions regarding this removal.

ERRS	\$ 961,048
USCG	\$ 16,000
START	<u>\$ 30,120</u>
<b>TOTAL SITE COSTS:</b>	<b>\$1,007,168</b>

### III. DISPOSITION OF WASTES

Waste Stream Number	Waste Code	Description	Approximate Volume/Quantity	Waste Stream Handling Method	Disposal Location
1	Non- reg	Waste Water	1,248,155 gallons	Off-Site Treatment	IWS - Jacksonville Chesser - Folkston, GA
2	Non-reg	Waste Sludge/ Tank Bottoms	1,435 tons	On-Site solidification and Offsite Landfill	Chesser - Folkston, GA

### VI. ROSTER OF AGENCIES/ORGANIZATIONS ASSISTING IN REMOVAL

Organization/Agency, Address	Primary Contact	Phone Number	Role/Activity
USEPA R4 61 Forsyth St. Atlanta, GA 30303	Terry Stilman	(404) 562-8748	On-Scene Coordinator
Roy F. Weston 100 Peachtree St. Suite 420 Atlanta, GA 30303	Michael Sparks	(404) 527-7016	Program Manager, Technical Support Contractor
WRS. 5555 Oakbrook Parkway Suite 175 Norcross, GA 30093	Jay Grills	(404) 475-8504	Project Manager, Emergency and Rapid Response Services
FLDEP-BER 7825 Baymeadows Way Jacksonville, FL 32256	Kenton Brown	(904) 807-3246	Emergency Response, assessment and assistance with oversight

Please be advised that statements in this document concerning the status of response activities are intended solely for use by employees of the United States Environmental Protection Agency for management of the Superfund removal program and are not intended for use in calculating cost

recovery statues of limitations. Moreover, EPA may continue to evaluate this site to determine the necessity of additional response actions.