



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

EPA Region 5 Records Ctr.



299925

**MEMORANDUM**

**SEP 24 2008**

REPLY TO THE ATTENTION OF

**SUBJECT:** **ACTION MEMORANDUM** - Request for a Time-Critical Removal Action and Exemption from the \$2 Million Statutory Limit at the Ohio Cast Products Site, Canton, Stark County, Ohio (Site ID # B5NL)

**FROM:** Stephen Wolfe, On-Scene Coordinator  
James Justice, On-Scene Coordinator  
Emergency Response Branch 1 - Section 1

**TO:** Richard C. Karl, Director  
Superfund Division

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

**I. PURPOSE**

The purpose of this Memorandum is to request and document your approval to expend up to \$3,486,944 and grant an exemption from the \$2 million statutory limit in order to conduct a time-critical removal action to eliminate an imminent and substantial threat to public health, welfare, and the environment at the Ohio Cast Products Site (OCP). The presence of hazardous substance as defined by 40 Code of Federal Regulations, Part 302.4, has been documented by the U.S. EPA during a site assessment performed on May 22, 2008. In addition, asbestos-containing material (ACM) in the building rubble piles and material contaminated with polychlorinated biphenyls were also documented to be on Site during the site assessment. The proposed removal action is necessary in order to mitigate the immediate threat to public health, welfare, and the environment posed by the hazardous materials present at the OCP Site. The OCP Site is located at 2408 13<sup>th</sup> Street NE, Canton, Stark County, Ohio.

The response action proposed herein will mitigate Site conditions by properly removing and the off-site disposal of the following: drums and other containers with hazardous material; hazardous material inside tanks and sumps; polychlorinated biphenyl (PCB)-contaminated soils, solid waste and oil; and solid debris contaminated with ACM. This response action will be conducted in accordance with Section 104(a)(1) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 USC § 9604(a)(1).

Additional Site activities will include perimeter and work zone air monitoring, demolition and disposal of contaminated flooring and solid material, and dismantling of tanks, transformers and other structures. The fact that hazardous material is present in an uncontrolled area in the city adjacent to a waterway requires that this removal be classified as a time-critical removal action. The project will require an estimated 90 on-site working days to complete.

The OCP Site is not on the National Priorities List (NPL).

## **II. SITE CONDITIONS AND BACKGROUND**

CERCLIS ID #OHN 000 510 278

### **A. Physical Location and Description**

The OCP Site is located at 2408 13<sup>th</sup> Street NE, Canton, Stark County, Ohio, 44705 and the geographical coordinates for the Site are: latitude 40° 48' 34' North and longitude 81° 20' 28" West. The OCP Site encompasses approximately 11.20 acres of land and has a series of interconnected buildings which covers approximately one quarter of the Site. The buildings were added on over the years of operations at the location. The main office area was located in the western portion of the building.

The Site is located in a mixed residential and industrial neighborhood with residential properties located approximately 75 feet to the north of the Site. The Site is bordered to the north by 13<sup>th</sup> Street NE, to the east and west by other industrial properties and to the south by the East Branch of the Nimishillen Creek (which is part of the Mississippi River watershed via Sandy Creek, Tuscarawas River, Muskingum River, and the Ohio River). Residential properties are located to the north, across 13<sup>th</sup> Street.

According to the Region V Superfund Environmental Justice Analysis, in Ohio, the average low-income percentage is 30% and the average minority percentage is 16%. To meet the EJ concern criteria, the area within 1 mile of the Site must have a population that's twice the state low-income percentage and/or twice the state minority percentage. That is, the area must be at least 60% low-income and/or 32% minority. At this Site, the low-income percentage is 56% and the minority is 37% as determined by Arcview 3.0 EJ analysis using Census 2000 Database. Therefore, this Site does meet the region's EJ criteria based on demographics as identified in "Region 5 Interim Guidelines for Identifying and Addressing a Potential EJ Case, June 1998."

## **B. Site Background**

Ohio Cast Products, Inc. (Ohio Cast) manufactured iron auto products at its worksite in Canton, Ohio. A fire destroyed the office portion of the building on February 20-21, 2008. During the fire fighting efforts, the City of Canton's Fire Department discovered numerous drums and totes located on the southern portion of the Site and inside the remaining buildings, many of which had "Flammable Liquid" labeling. The City of Canton contacted the Ohio EPA for assistance and after a Site visit, the Ohio EPA formally requested assistance from the U.S. EPA on March 6, 2008. On March 18<sup>th</sup>, 2008, U.S. EPA On-Scene Coordinators James Justice and Stephen Wolfe visited the Site to assess the conditions. After the Site visit, it was determined that a thorough site assessment was necessary as there were additional potential environmental issues associated with the Site.

U.S. EPA performed a site assessment on May 22<sup>nd</sup>, 2008. Results of the site assessment indicated that some of the drums and containers contained flammable and corrosive liquids. PCBs were also discovered in foundry sand inside the warehouse (approximately 150,000 milligrams per kilogram [mg/kg]) related to a leaking transformer. PCBs were also discovered in soils outside the building around an electrical substation for the foundry (240 mg/kg). In addition, there is substantial evidence that there is another transformer with PCB oil located inside the building in the portion destroyed by the fire. Additionally, friable asbestos was discovered in the building rubble of the fire-destroyed portion of the facility. Water (with oil floating on top) was observed in pits of the warehouse that was associated with process machinery. Finally, there is a basement associated with the burned out portion of the facility which is likely full of water from the fire fighting efforts and potentially contaminated with PCBs.

On Monday, June 30<sup>th</sup>, 2008 U.S. EPA and START returned to the Site to collect samples from the pits of the warehouse. Analytical results indicated that PCBs were present in the oil phase of the liquid (greater than 2,000 mg/kg) and the water phase of the liquid (greater than 3,000 micrograms per liter [ $\mu\text{g/L}$ ]). U.S. EPA and START inspected the leaking transformer that was noted in the previous inspection and more PCB-contaminated oil had leaked out of the transformer (cause unknown) and flowed onto the building floor, and subsequently out to the environment

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

The conditions at the OCP Site present an imminent and substantial threat to the public health, or welfare, and the environment, and meet the criteria for a time-critical removal action based on factors Section 300.415(b)(2) of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), as amended. These factors include, but are not limited to, the following:

**A) Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants;**

The Site is susceptible to trespass and the City of Canton's fire department believes the fire on February 20-21, 2008 was started by vagrants. Fencing is present between the industrial properties; however, there is a large gap in the gate which a person could pass through. During a second Site visit on June 30, 2008, U.S. EPA spoke with a neighboring company and they indicated that trespassers were present on the property as well as their own property looking for scrap metal. The fire damaged much of the security of the building itself (broken windows and doors) and there is no fencing along the river border. In addition, animal prints were visible in the softer ground on the facility.

Samples collected during the site assessment have confirmed the presence of fire-damaged and highly weathered ACM in the remnants of the structure. Asbestos is a hazardous substance as defined by 40 CFR Section 302.4 of the NCP. Asbestos is of potential concern because chronic inhalation exposure to excessive levels of asbestos fibers suspended in air can result in lung disease such as asbestosis, mesothelioma, and lung cancer. Subacute exposures as short as a few days have been shown to cause mesothelioma. The open, partially razed condition of the western portion of the facility additionally subjects the ACM in the debris piles to wind and water transport mechanisms, increasing the probability for off-site mobilization of particulate matter through wind and surface water runoff.

Asbestos is the name given to a number of naturally occurring fibrous minerals with 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 such as automobile clutch, brake, and transmission parts. The current federal definition of asbestos is the asbestiform varieties of: chrysotile (serpentine); crocidolite (riebeckite); amosite (cummingtonite/grunerite); anthophyllite; tremolite; and actinolite.

**Health Effects:**

Exposure to airborne friable asbestos may result in a potential health risk because persons breathing the air may breathe in the asbestos fibers. Continued exposure can increase the amount of fibers that remain in the lung. Fibers embedded in lung tissue over time may cause serious lung diseases including: asbestosis, lung cancer, or mesothelioma.

According to the Agency for Toxic Substance and disease Registry:

Asbestos mainly affects the lungs and the membrane that surrounds the lungs. Breathing high levels of asbestos fibers for a long time may result in scar-like tissue in the lungs and in the pleural membrane (lining) that surrounds the lung. This disease is called asbestosis and is usually found in workers exposed to asbestos, but not in the general public. People with asbestosis have difficulty breathing, often a cough, and in severe cases heart enlargement. Asbestosis is a serious disease and can eventually lead to disability and death.

Breathing lower levels of asbestos may result in changes called plaques in the pleural membranes. Pleural plaques can occur in workers and sometimes in people living in areas with high environmental levels of asbestos. Effects on breathing from pleural plaques alone are not usually serious, but higher exposure can lead to a thickening of the pleural membrane that may restrict breathing.

Corrosive liquid (pH of 1) was identified in one drum labeled sulfuric acid and corrosive labeling was identified on 20 additional containers in Areas 5, 8, 12, and 13 during the site assessment. The drums were labeled sulfuric acid and aluminum sulfate. Pursuant to 40 CFR 261.22 (a) (1), the material in at least one of the sulfuric acid drums is considered to be hazardous based on the RCRA characteristic of corrosivity, which states: "a solid waste exhibits the characteristic of corrosivity if a representative sample. . . is aqueous and has a pH less than or equal to 2 or greater than or equal to 12.5..." One drum labeled sulfuric acid and suspected of containing corrosive liquid was inaccessible for collection of a liquid sample for laboratory analysis; however, colorimetric pH paper strips were utilized by the field personnel to determine a pH equal to 1 for liquid in another drum labeled sulfuric acid.

Sampling results identified ignitable liquids in one drum labeled methyl formate and flammable labeling was identified on 10 other drums and 23 small containers. The laboratory flashpoint result from this drum sample was reported as below 45 degrees Fahrenheit. Pursuant to 40 CFR 261.21 (a) (1), this material is considered hazardous based on the RCRA characteristic of ignitability, which states: "a solid waste exhibits the characteristic of ignitability if a representative sample of the waste ...is a liquid, other than an aqueous solution containing less than 24 percent alcohol by volume and has flash point less than 60°C (140°F), as determined by the Pensky Martens Closed Cup Tester..." Unlike the majority of the drums staged at the Site, the two drums labeled "methyl formate" are in fair condition, closed, and staged inside the still-standing structure. However, access to these drums is unrestricted.

During the site assessment, the field personnel noted dense patterns of impressions of animal tracks both outside and inside the facility, particularly in the wet sand inside the "bag house" where analytical results indicated concentrations of 150,000 mg/kg of PCB Aroclor 1260 in the sand. In accordance with the Toxic Substances Control Act (TSCA) regulations promulgated under 40 CFR Part 761.125 (a), "the reporting, disposal, and

precleanup sampling requirements...apply to all spills of PCBs at concentrations of 50 ppm or greater which are subject to decontamination requirements under TSCA". The PCB concentration (150,000 mg/kg) in the sand sample collected inside the "bag house" (OCP-SS-052208-01) exceeded the TSCA regulatory level of 50 ppm. The PCB concentration (240 mg/kg) in the soil sample collected north of the transformer pad at the outdoor electrical substation (OCP-SS-052208-02) also exceeded the TSCA regulatory level. Aroclor 1260 is one of the more persistent PCB congener blends in the environment, and the high molecular percentage of chlorination in Aroclor 1260 makes it one of the most toxic PCB congener blends to human and animal populations.

According to the Agency for Toxic Substance and Disease Registry:

Health effects that have been associated with exposure to PCBs include acne-like skin conditions in adults and neurobehavioral and immunological changes in children. PCBs are known to cause cancer in animals.

Unrestricted access to the Site could result in an accidental or intentional release of potentially hazardous substances stored in and around the facility. Although the Site is fenced, access is limited but possible in the western fire-damaged portion of the facility. During the site assessment, field personnel documented the presence of animals within the Site boundaries, and anecdotal information suggests that trespassers have been accessing the Site to collect scrap metal. Access onto the Site could also result in the potential exposure to the transformers and PCB-contaminated soil around the outdoor electrical substation, PCB-contaminated sand in the "bag house", PCB-contaminated water in the trench in Area 5, and all of the totes, drums, cylinders, tanks, and small containers documented at the Site. A significant portion of these hazards are located outdoors along the south side of the facility, within 200 feet of the East Branch Nimishillen Creek. Fishing for meal consumption does occur on the Nimishillen Creek and its subsequent rivers. In addition, Nimishillen Creek is also used for recreational purposes (canoeing, kayaking, swimming, etc.) Field personnel on site during the site assessment did not identify any storm water drains or other manmade conduits in direct connection with the Creek. However, surface water runoff and groundwater flow are potential pathways for the migration of potentially hazardous substances released at the Site to the Creek. There is significant visible evidence of oil-stained soil and stressed vegetation around the base of several transformers, process tanks, and drums in the southern portion of the site adjacent to the Creek.

The close proximity of residences and other vulnerable areas immediately surrounding the Site increases the likelihood of a release and/or exposure to potentially hazardous substances stored at the Site. Also, the tanks, totes, and drums are located outside and inside the buildings with no secondary containment. Overall, the potential for exposure to potentially hazardous substances stored at the Site is high.

**B) Actual or potential contamination of drinking water supplies or sensitive ecosystems;**

As stated above, contaminants present at the Site could migrate to Nimishillen Creek. The Nimishillen Creek is part of the Nimishillen watershed and eventually the Mississippi River watershed (with other watersheds in between). Numerous drinking water intakes are present downstream of the Site, especially along the larger rivers (Tuscarawas, Muskingum, and Ohio).

**C) Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers that pose a threat of release;**

Based on the analytical results and field observations obtained during the U.S. EPA site assessment, hazardous substances, including abandoned materials having a flashpoint of less than 45 degrees Fahrenheit or a pH of 1 or less, are present on-Site in 55-gallon drums, and numerous small containers (5-gallons or less). Several small (500 gallon) above ground storage tanks labeled "Used Oil" are present on-Site and there is staining around the tanks indicating historic releases. The pits inside the buildings are full of water with an oil layer. There are numerous 250-gallon totes located on-Site, most of which have some type of sludge material in the bottom. There are at least two large transformers located inside the building which do contain PCB oil, one of which has leaked in the past (visual staining) and has recently leaked more of its contents onto the floor of the building and subsequently into the environment. Many of the totes do not have lids and the pits are open and exposed to the elements due to holes in the roof of the warehouse. These vessels contain Resource Conservation and Recovery Act (RCRA) hazardous wastes as defined by the following waste codes: D001 (characteristic of ignitability [flash point analytical result less than 45 degrees Fahrenheit]) and D002 (characteristic of corrosivity [field pH of 1 standard unit]) and are present on Site in an uncontrolled manner and pose current and continued risk to anyone accessing the property.

**D) High Levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface that may migrate;**

PCBs were detected in surface soil around an electrical substation at the facility. The substation is located on the bank of the East Branch of the Nimishillen Creek and could potentially migrate off Site due to erosion. A second Site visit by U.S. EPA found that PCB oil from a transformer located inside the building had leaked most or all of its contents onto the floor of the facility since the last visit. The PCB oil migrated from inside the building to the soil near the building entrance (visual evidence).

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

A large portion of the facility was destroyed by fire, exposing the rest of the building to the elements. Heavy rains could potentially cause the already full pits to overflow and the material could migrate outside the building onto 13<sup>th</sup> Street NE via bay doors that open onto the streets or over ground and discharge directly into the Nimishillen Creek. Since the electrical substation is located in close proximity to the East Branch of the Nimishillen Creek, heavy rains and/or flooding could cause the PCBs located in the soils near the electrical substation to migrate off Site via the creek. In addition, dry windy weather could cause the asbestos located in the burned out portion of the facility to become airborne and carried throughout the neighborhood. In addition, PCB oil from the leaking transformer migrated from inside the building to the environment likely due to heavy rains and a leaking roof.

**F) Threat of fire or explosion;**

A large fire occurred at the facility on February 20-21, 2008. There are numerous containers of flammable material located on-Site which could catch fire or explode due to vagrants, trespassers, or extreme weather conditions.

**G) The availability of other appropriate federal or state response mechanisms to respond to the release.**

In a letter dated March 6, 2008, Ohio EPA requested assistance from the U.S. EPA in conducting an investigation and a time-critical removal action at the OCP Site. Neither Ohio EPA nor any other local government has adequate finances or resources to respond to a time-critical removal action of this magnitude.

**IV. ENDANGERMENT DETERMINATION**

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

**V. EXEMPTION FROM STATUTORY LIMITS**

Section 104(c) of CERCLA as amended by SARA, limits a Federal emergency response to \$2 million unless three criteria are met. The quantities and levels of hazardous substances at the Ohio Cast Products Site warrant the \$2 million exemption based on the following factors:

**A) There is an immediate risk to public health or welfare or the environment;**



The Site is located in a mixed industrial and residential neighborhood. The Site has been the target of metal scrappers and trespassers, who are believed to be the cause of the fire that destroyed half of the building. There is also evidence of the Site being frequented by wildlife. The presence of uncontained soils and oils with high concentrations of PCBs (150,000 mg/kg) has been documented at the Site and additional inspections have documented its migration through the soils. A portion of the contaminated soils is located within 50 feet of the East Branch of the Nimishillen Creek. The presence of asbestos containing materials (as high as 20% by volume) in the building debris and its continued exposure to wind and rain present an imminent threat of release to the surrounding neighborhood. The unsecured presence of numerous drums and tanks with unknown contents presents a risk to the general public and first responders if additional fires occur at the Site.

**B) Continued response actions are immediately required to prevent, limit, or mitigate an emergency;**

The continued unsecured presence of hazardous substances at the Site constitutes an imminent threat to human health, welfare and the environment. The exposure of the PCB-contaminated soils and oil, unsecured drums containing corrosive (pH of 1) waste materials, waste materials that are ignitable (flashpoints below 45 degrees Fahrenheit) and asbestos in the building debris to wind and rain constitutes a threatened release that if left unmitigated could impact the environment and surrounding residential neighborhood.

**C) Assistance will not otherwise be provided on a timely basis.**

In a letter dated March 6, 2008, Ohio EPA requested assistance from the U.S. EPA in conducting an investigation and a time-critical removal action at the OCP Site. Neither Ohio EPA nor any other local government has adequate finances or resources to respond to a time-critical removal action of this magnitude.

**VI. PROPOSED ACTIONS AND ESTIMATED COSTS**

The OSC proposes that the following actions to mitigate threats posed by the presence of hazardous substances at the Site:

- 1) Develop and implement a Site Health and Safety Plan;
- 2) Remove and dispose of asbestos-contaminated building debris;
- 3) Remove and dispose of PCB contaminated soils, sand, transformers, capacitors and other PCB contaminated surfaces;

- 4) Remove and dispose of all drums, totes, and other containers of hazardous materials, contaminants, or pollutants;
- 5) Transport and dispose of all hazardous material, or contaminants at an EPA-approved disposal facility in accordance with U.S. EPA's Off-Site Rule (40 CFR § 300.440);
- 6) Render any large storage tanks unusable at the Site;
- 7) Take any necessary response action to address any release or threatened release of a hazardous substance, pollutant, or contaminant that the U.S. EPA determines may pose an imminent and substantial endangerment to the public health or the environment.

The removal action will be conducted 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. Elimination of all surface threats is, however, expected to minimize the need for post-removal Site control.

The removal activities described in this memorandum will require an estimated 90 on-site working days to complete.

A detailed cleanup contractor cost estimate is presented in Attachment 1 and estimated project costs are summarized below:

### **REMOVAL PROJECT CEILING ESTIMATE**

#### **EXTRAMURAL COSTS:**

##### **Regional Removal Allowance Costs:**

Total Cleanup Contractor Costs	\$ 2,684,623
(This cost category includes estimates for ERRS, and subcontractors. Includes a 15% contingency.)	

##### **Other Extramural Costs Not Funded from the Regional Allowance:**

Total START, including multiplier costs	<u>\$ 221,164</u>
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Subtotal, Extramural Costs	\$2,905,787
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Extramural Costs Contingency (20% of Subtotal, Extramural Costs)	<u>\$ 581,157</u>
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<b>TOTAL, REMOVAL ACTION PROJECT CEILING</b>	<b>\$ 3,486,944</b>
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The response actions described in this memorandum directly address the actual or threatened release at the OCP Site of a hazardous substance, or of a pollutant, or of a contaminant which may pose an imminent and substantial endangerment to public health or welfare or to the environment. These response actions do not impose a burden on affected property disproportionate to the extent to which that property contributes to the conditions being addressed.

## **Applicable or Relevant and Appropriate Requirements**

All applicable, relevant, and appropriate requirements (ARARs) of Federal and state law will be complied with to the extent practicable. On July 10, 2008, a letter was sent to Bart Ray, Ohio EPA requesting that the state identify any applicable state ARARs.

All hazardous substances, pollutants, or contaminants removed off-site pursuant to this removal action for treatment, storage, and disposal shall be treated, stored, or disposed at a facility in compliance, as determined by U.S. EPA, with the U.S. EPA Off-Site Rule, 40 C.F.R. § 300.440.

### **VII. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN**

Given the Site conditions, the nature of the hazardous substances documented on Site, and the potential exposure pathways to nearby populations described in Sections II and III above, actual or threatened release of hazardous substances from the Site, if not addressed by implementing the response actions selected in this Action Memorandum, will continue to present an imminent and substantial endangerment to public health, welfare, or the environment.

### **VIII. OUTSTANDING POLICY ISSUES**

None..

### **IX. ENFORCEMENT**

For administrative purposes, information concerning the enforcement strategy for this Site is contained in the Enforcement Confidential 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 \$5,440,504.<sup>1</sup>

$$(\$3,486,944 + \$150,000) + (49.59\% \times \$3,636,944) = \$5,440,504$$

### **X. RECOMMENDATION**

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<sup>1</sup>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.

This decision document represents the selected removal action for the Ohio Cast Products Site, Canton Stark County, Ohio, developed in accordance with CERCLA as amended, and not inconsistent with the NCP. This decision was based upon the administrative record for the Site. Conditions at the Site meet the NCP Section 300.415(b) criteria for a removal and the CERCLA Section 104(c) emergency exemption from the \$2 million limitation, and I recommend your approval of the proposed removal action. The total removal action project ceiling if approved will be \$3,486,944. Of this, an estimated \$3,265,780 comes from the Regional removal allowance. You may indicate your decision by signing below:

APPROVE: Richard C. Kal DATE: 9-24-08  
Director, Superfund Division

DISAPPROVE: \_\_\_\_\_ DATE: \_\_\_\_\_  
Director, Superfund Division

#### Enforcement Addendum

Attachments: I. Administrative Record Index  
II. Detailed Cleanup Contractor Cost Estimate  
III. Independent Government Cost Estimate  
IV. Region 5 EJ Analysis  
V. Site Map

cc: D. Chung, U.S. EPA, 5202-G  
M. Chezik, U.S. Department of the Interior, **w/o Enf. Addendum**  
Chris Korleski, Director, Ohio EPA, **w/o Enf. Addendum**  
Ohio Attorney General, **w/o Enf. Addendum**

**ENFORCEMENT ADDENDUM**

**OHIO CAST PRODUCTS SITE  
CANTON, STARK COUNTY, OHIO**

**AUGUST 2008**

**(REDACTED 1 PAGE)**

**ENFORCEMENT CONFIDENTIAL  
NOT SUBJECT TO DISCOVERY**

**ATTACHMENT 1**

**ADMINISTRATIVE RECORD INDEX  
OHIO CAST PRODUCTS SITE  
CANTON, STARK COUNTY, MICHIGAN  
AUGUST 2008**

<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
03/06/08	Clouse, K. OEPA	Durno, M. U.S. EPA	Removal Request Letter	1
pending	Kiel, A. Weston Solutions, Inc.	Wolfe, S. Justice, J. U.S. EPA	Site Assessment Report	Pending
07/10/08	Justice, J. U.S. EPA	Ray, B. OEPA	ARAR Request Letter	1
07/12/08	Wolfe, S. Justice, J.	Karl, R. U.S. EPA	Action Memorandum request for a time-critical removal action at the Ohio Cast Products Site	(Pending)

## ATTACHMENT 2

### DETAILED CLEANUP CONTRACTOR ESTIMATE OHIO CAST PRODUCTS SITE CANTON STARK COUNTY OHIO AUGUST 2008

The estimated cleanup contractor costs necessary to complete the removal action at the Ohio Cast Products Site are as follows:

Personnel	\$ 513,145
Equipment	\$ 337,310
Transportation and Disposal	<u>\$1,484,000</u>
<u>Contingency (15%)</u>	<u>\$ 350,168</u>
<b>TOTAL</b>	<b>\$ 2,684,623</b>



# **ATTACHMENT 3**

## **INDEPENDENT GOVERNMENT COST ESTIMATE**

**OHIO CAST PRODUCTS SITE  
CANTON, STARK COUNTY, OHIO**

**AUGUST 2008**

**NOT RELEVANT TO THE SELECTION OF THE REMOVAL ACTION**

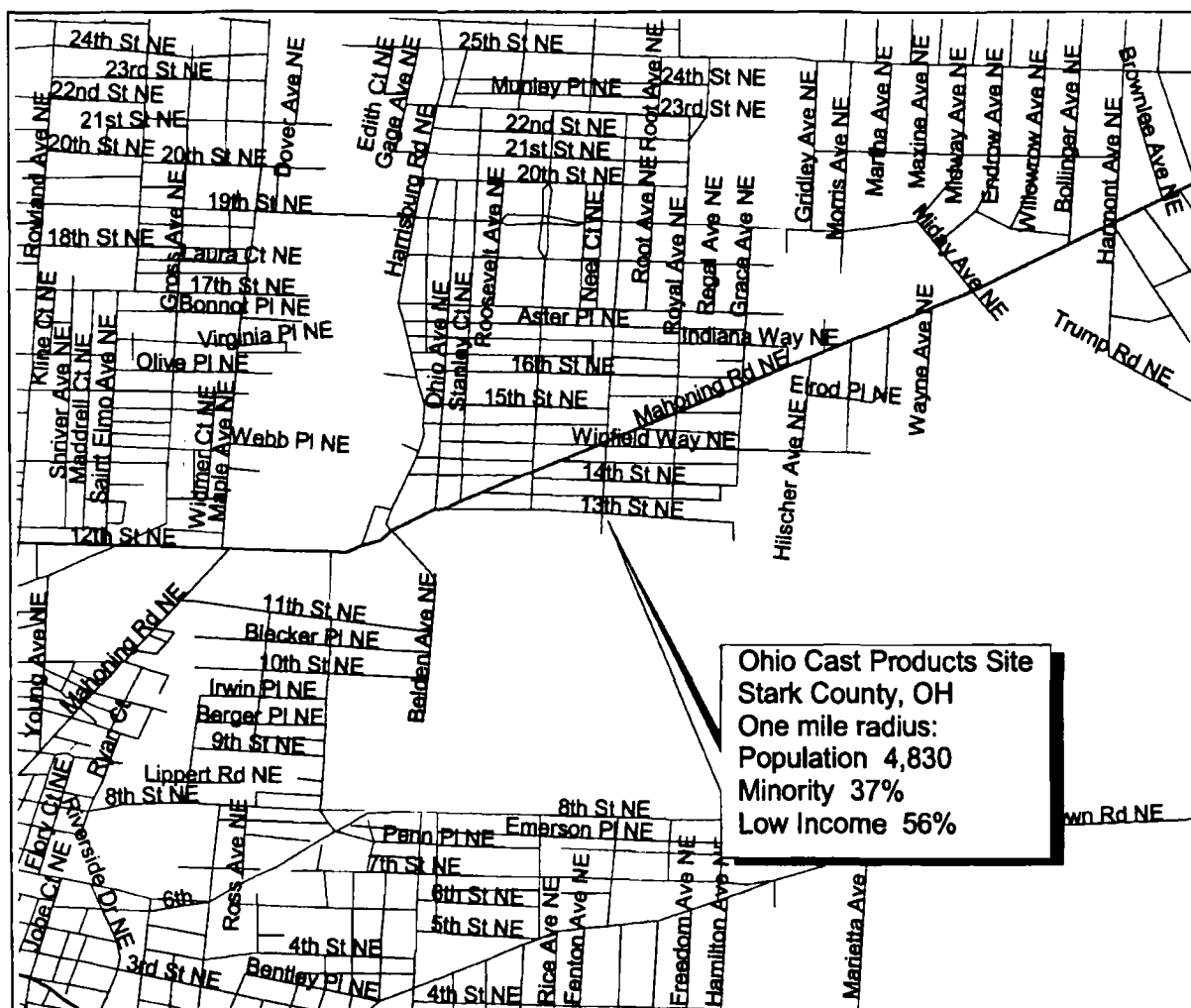
**(REDACTED 2 PAGES)**

**ATTACHMENT 4**

**EJ ANALYSIS  
OHIO CAST PRODUCTS SITE  
CANTON, STARK COUNTY, OHIO  
AUGUST 2008**

# Region 5 Superfund EJ Analysis

## Ohio Cast Products Site Canton, OH



0 0.5 1 1.5 2 Miles

State of Ohio averages:

Minority: 16%

Low Income: 30%

U.S. EPA Region 5  
Environmental Justice Case Criteria  
for State of Ohio

Minority: 32% or greater

Low Income: 60% or greater

Date of Map: 5/30/08

Source of Map: Census 2000 Database/  
ArcView 3.0

**ATTACHMENT 5**

**SITE MAP  
OHIO CAST PRODUCTS SITE  
CANTON, STARK COUNTY, OHIO  
AUGUST 2008**

# Ohio Cast Products Site Boundaries

