UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
SAM NUNN ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

ACTION MEMORANDUM AMENDMENT

SUBJECT: Action Memorandum Amendment - Ceiling Increase Request for Continuation of the Time-Critical Removal Action at the Westside Lead Site, Atlanta, Fulton County, Georgia

FROM: Charles Berry, On-Scene Coordinator

THRU: James Webster, Chief
Emergency Response, Removal, Prevention & Preparedness Branch

TO: Carol J. Monell, Director
Superfund & Emergency Management Division

I. PURPOSE

The purpose of this Action Memorandum Amendment is to request and document the approval of additional funding for the time-critical removal action at the Westside Lead Site (the Site) in Atlanta, Fulton County, Georgia. The original Action Memorandum, dated November 4, 2019, identified the need for a time-critical removal action to address properties with lead concentrations over the site-specific removal goal (SSRG) of 400 parts per million (mg/kg) and set an initial project budget of $1,814,869. A subsequent Action Memorandum Amendment dated May 5, 2020, expanded the scope of work and increased funding to $5,940,000. It also approved an emergency exemption to the 12-month and $2,000,000 statutory limitations. On September 18, 2020, the Assistant Administrator for the Office of Land and Emergency Management approved a ceiling increase to $17,995,000, expanding the scope of the project to match the growing number of properties identified with lead concentrations over the SSRG. That amendment continued the emergency exemption approved earlier.

The amendment presented here requests an additional ceiling increase to respond to the identification of additional properties with slag-derived lead concentrations over the SSRG. It requests a continuance of the emergency exemption but also requests a new consistency exemption, as the Site was added to the National Priorities List (NPL) in March 2022. If approved, the new site ceiling will be **$28,250,000.**

II. SITE CONDITIONS AND BACKGROUND

SEMS ID: GAN000407160
Site ID Number: C482
Removal Category: Time-Critical Removal

A. Site Description

This section is a summary of information presented in previous Action Memoranda. While the metrics presented here are updated, readers are encouraged to consult prior Action Memoranda for a full detailed discussion of the topics presented.

The Westside Lead Site is an area of residential soil contamination in Atlanta's English Avenue[1] and Vine City neighborhoods. Slag, an industrial waste from various metal-smelting processes, appears to have been used as fill material during property development across portions of the neighborhoods. Atlanta's westside neighborhoods were developed during the late 1800s and early 1900s. During this period there were few limitations on the use of industrial waste material. The slag used in Atlanta's western neighborhoods contains lead.

1. Site Discovery / Removal Site Evaluation / Remedial Investigation

In 2018, an Emory University student working on a doctoral dissertation identified elevated lead concentrations at several locations in west Atlanta. Soil testing showed lead concentrations greater than 4,000 milligrams per kilogram (mg/kg), 10 times the U.S. Environmental Protection Agency's Removal Management Level (RML) of 400 mg/kg[2]. The findings were reported to the Georgia Department of Natural Resources' Environmental Protection Division (GA EPD), who, in November 2018, requested EPA perform a Removal Site Evaluation (RSE).

In early 2019, the Region 4 Emergency Response, Removal, Prevention and Preparedness Branch (ERRPPB) initiated that RSE. An initial 60-block section of the neighborhood surrounding the Emory University sampling locations was selected. Sampling revealed 65% of the properties sampled had lead concentrations greater than the RML of 400 mg/kg. Slag was observed at the surface of many parcels outside the 60-parcel area. Consequently, the site boundary (often referred to as the "study area") was expanded in June 2019 to 368 properties. Sampling continued, and, by the autumn of 2019, the On-Scene Coordinator determined there was an imminent and substantial endangerment to human health from the lead in the soil. An Action Memorandum was signed by the SEMD Division Director in November 2019.

The Superfund Scientific Support Section (SSS) reviewed bioavailability data for the Site and determined that 400 mg/kg, would be expected to result in a blood lead value of no greater than 7 micrograms per deciliter (µg/dl) using the Integrated Exposure Uptake Biokinetic (IEUBK) exposure model. The OSC established a value of 400 mg/kg as the SSRG in the initial Action Memorandum.

In July 2020, the Region 4 Restoration and Site Evaluation Branch (RSEB) took over management of sampling efforts as part of a remedial investigation. High-priority properties identified during that investigation are referred to ERRPPB for time-critical response. RSEB's investigation expanded and eventually resulted in the listing of the Site on the NPL in March 2022. RSEB continues to plan and prepare for eventual assumption of the response action, with a general plan to be mobilized by the beginning of Summer

[1] While there is an "English Avenue" in the English Avenue neighborhood, the phrase, as used here, refers to the entire neighborhood.

[2] This value is the default concentration derived using generic exposure and standard bioavailability values. Actual cleanup concentrations can be higher or lower depending on site-specific bioavailability data.

2023. Until that mobilization occurs, ERRPPB's time-critical action remains the only mechanism available to address the threat due to slag-derived lead contamination at the Site.

2. Physical Location

The Site study area currently covers about 615 acres and encompasses just under 1 square mile of West Atlanta. There are 2,097 residential properties within the study area. Since the submission of the last Action Memorandum for this site, the site address was changed to 431 Vine Street, Atlanta, GA 30318, the location of the EPA staging area. The site coordinates are 33.766472, -84.407278. The current Site boundary is a line beginning at the intersection of Martin Luther King Jr Drive and Northside Drive, running west to Joseph E. Lowery Boulevard, following Joseph E. Lowery Boulevard north to the old CSX rail line (now part of the Atlanta Beltline PATH) crossing, following the rail line east to the intersection of Donald Lee Hollowell Parkway and Northside Drive, running south along Northside Drive until the intersection Martin Luther King Jr. Drive again. The Site is defined as the residential properties within the boundary with identified soil lead concentrations greater than the SSRG. Industrial, commercial, and municipal property (parks and schools) are excluded from the current removal action as it is envisioned there are other response mechanisms available to address those properties.

3. Site Characteristics

The English Avenue and Vine City neighborhoods are located on the west side of Atlanta and have existed since the mid- to late-1800s. The neighborhoods were historically residential but are immediately adjacent to a major rail corridor through the central city. Large numbers of industrial properties were located along the corridor, including a coal-fired power plant, an iron foundry, a municipal incinerator, a recycling center, and a manufactured gas plant. By the mid-1900s most of these facilities were shutting down, and by the mid-1970s nearly all the industrial property was abandoned or converted to municipal use, including what is now the Georgia World Congress Center, Mercedes-Benz Stadium, and State Farm Arena.

English Avenue and Vine City today are low-income and majority-minority neighborhoods. The area is considered an environmental justice community as detailed in the updated EJSCREEN report included as Attachment 1. Community organizing and revitalization efforts have recently taken hold in the community, but the underlying issues that affect the neighborhood remain.

English Avenue and Vine City are served by a combined sewer system, which channelized Proctor Creek's tributaries in the first half of the 20th Century. There are no streams in the neighborhood. Stream beds were filled in and developed; houses now sit directly over where streams once flowed. The trunk lines that now carry surface runoff and municipal flow often run through yards and under buildings. Runoff now flows into drains located in or near the old creek beds, which oftentimes are directly in the middle of a contaminated property. During heavy rain events, the sewer systems are often overwhelmed. Consequently, runoff management is a constant burden on removal activities, frequently requiring multiple lots be addressed as a single unit in order to

maintain proper grading and eliminate flooding issues. Removal actions have been forced to take this into account when designing remediation plans. The removal of vegetative cover on one lot increases overland flow onto another, requiring removal crews to engineer diversion, channeling, and retention devices, thus increasing removal costs.

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

The presence of lead in the soil at the Site constitutes a release of hazardous substances as defined by CERCLA 101 (14) and 101(22). Lead is a hazardous substance listed in CFR Title 40 Section 302.4. A description of past, present and future releases or potential releases of lead-contaminated soils from the Site are detailed in Section III below.

5. National Priorities List (NPL) Status

The Site was officially listed on the NPL in March 2022. On-site activities by RSEB are expected to begin by the summer of 2023. Until that time, ERRPPB remains the only response to the threats described herein.

6. Maps, pictures, and other graphic representations

A map of the site showing all sampled property, the results, and those with completed removal actions is attached to this Action Memorandum as Attachment 2.

B. Other Actions to Date

1. Previous Actions

Prior to the EPA's current action, there were no actions taken at the Site.

2. Current Actions

On November 4, 2019, an Action Memorandum was approved, authorizing $1,814,869 in funding to address an initial set of properties. Removal activities were initiated in late January 2020 and continue to the present. During that same time, the number of affected properties continued to grow, necessitating expansion of the project's scope. Two subsequent Action Memoranda amendments were approved that increased the total approved funding to $17,995,000.

RSEB assumed control of sampling and characterization activities in June 2020, with those activities being folded into the remedial investigation. Once sampled by RSEB, properties with lead concentrations over the SSRG are ranked into risk tiers that consider the soil lead levels and the age of the residents living at the properties, with children given the highest priority. RSEB refers the highest-risk properties to ERRPPB for time-critical action.

ERRPPB has constructed a staging area in the neighborhood and maintains several office trailers for EPA and contractor use. Contaminated soil is excavated by mini-excavators.

Technical contractors use X-Ray fluorescence to guide the excavation depth, with excavation occurring until either the soil lead concentrations are below 400 mg/kg or excavation reaches a full 2 feet below the planned restored ground surface. The contaminated soil is then brought to the staging area where it is periodically loaded out into trucks for delivery to a local CERCLA-approved landfill as non-hazardous waste. Backfill is brought in from a borrow pit that was sampled for multiple constituents prior to use. Properties are restored as practicable, with input and guidance from the property owner. Restoration must be mindful of water management issues. Water runoff control is a constant issue, as the neighborhood is in a combined-sewer service district. Surface water sewer collection points are in the old streambeds, which do not correlate to the modern roadways. Sewer drops and low points are frequently in the middle of yards, forcing the remediation crews to make sure overland flow can drain into these points. EPA is frequently forced to install or repair some private water control structures (e.g., retaining walls, French drains) and fix grading issues that, over the last 100 years since the neighborhood was built, have failed or been modified by residents. Occasionally, the City Department of Water Management has been contacted to repair City infrastructure to allow the crews to grade lots for proper drainage.

As of May 1, 2022, there are 2097 properties within the study area. RSEB has obtained access to 1015 properties, of which 985 have been sampled. RSEB has identified 391 properties with lead concentrations greater than 400 mg/kg, with the highest result at 5,264 mg/kg. ERRPPB has remediated 135 properties, leaving 256 properties remaining to be addressed. Sampling continues under RSEB's direction, and properties with contamination greater than 400 mg/kg continue to be identified and added to the project's scope. ERRPPB continues to address high-risk properties. Further expansion of the site study area may be warranted as data is gathered and evaluated.

C. State and Local Authorities' Role

1. State and Local Actions to Date

GA EPD has been involved with all activities at the Site. ERRPPB has coordinated all investigatory and response activities with GA EPD and the City of Atlanta. In particular, the City is assisting with water management infrastructure coordination and public outreach through the existing Neighborhood Planning Unit forum.

2. Potential for Continued State and Local Response

GA EPD will continue to be involved with the response but is unable to commit funding to perform the necessary cleanup. The City of Atlanta has committed to continue assisting with Community Involvement activities.

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

Lead is a hazardous substance as defined by Section 101(14) of CERCLA. CERCLA contaminants, if released from the Site, may present a hazard to the public. The threats stem primarily from human exposure to these hazardous substances in the soil. Direct contact, ingestion and inhalation of lead-contaminated soil are the primary exposure pathways. The lead in surface soils on-site pose the following threats to public health or welfare as listed in Section 300.415 (b)(2) of the National Oil and Hazardous Substance Pollution Contingency Plan (National Contingency Plan or NCP):

Section 300.415 (b)(2)(i) ***Actual or potential exposure to nearby human populations, or the food chain from hazardous substances or pollutants or contaminants***; As of May 1, 2022, 391 of the 985 parcels sampled (40%) contain lead levels in surface soil exceeding the SSRG of 400 mg/kg with the highest result at 5,264 mg/kg. There are more than 2,000 properties within the footprint of the current Site boundaries. Residents, especially small children, have potential direct contact exposure to the lead, through deliberate or incidental ingestion or via inhalation of airborne dust.

Section 300.415 (b)(2)(iv) ***High levels of hazardous substances or pollutants or contaminants in the soils largely at or near the surface, that may migrate***; Elevated lead in surface soils may migrate through land erosion or physical movement by owners and tenants. Lead levels in the soil have been observed as high as 5,264 mg/kg. These concentrations exist within the first six inches of Site soil. The slag in many areas was covered by only a thin layer of topsoil which, over the years, has eroded, exposing the slag. Weathering of this material will release additional lead to neighboring soil. Routine gardening and/or lawn maintenance may disturb exposed or buried slag, thus increasing the likelihood of direct exposure conditions addressed under Section 300.415 (b)(2)(i).

Section 300.415 (b)(2)(v) ***Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released***; Lead dust mobilized by aeolian processes may be inhaled by residents, including children. Airborne dust is also carried across property lines, so that children living on a property with low levels of lead may be exposed to lead dust emanating from another location. While the inhalation pathway was not quantified during the RSE, the *Superfund Lead-Contaminated Residential Sites Handbook*, August 2003, notes that it can be a significant source of lead exposure and that remediation of external sources is required to permanently remove this threat.

Section 300.415 (b)(2)(vii) ***The availability of other appropriate federal or state response mechanisms to respond to the release***; There are no other federal or state agencies available to respond. The GA EPD has requested the EPA's assistance with the removal action at the Site and has indicated that the State lacks the resources necessary to deal with the threats outlined in this Action Memorandum Amendment.

IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances from this Site, if not addressed by implementing the response actions selected in this Action Memorandum Amendment, may present an imminent and substantial endangerment to public health, welfare, or the environment.

V. EXEMPTION FROM STATUTORY LIMITATIONS

Exemptions to the 12-month and $2,000,000 statutory limitations were approved in the May 5, 2020, Action Memorandum and were continued in the September 18, 2020, amendment. Those conditions, outlined below, remain applicable to the Site. On March 16, 2022, the site was added to the NPL. Consequently, the OSC is now requesting a consistency exemption as detailed below.

A. Emergency Exemption

1. There is an immediate risk to public health or welfare from approximately 260 properties with soil contaminated with lead exceeding the SSRG of 400 parts per million. The families of these contaminated properties and community members who enjoy these properties are subject to actual or potential exposure to lead daily. Exposures can occur when residents conduct routine activities such as mowing grass, gardening, or playing in the yard.

2. Response actions are immediately required to prevent, limit, or mitigate an emergency. The analytical results of soil samples collected by the EPA show high levels of lead contamination in the top few inches of soil. Concentrations have been screened or analyzed as high as 5,264 mg/kg in the surface soil of these properties. Gardening, landscaping, and frequent use of the lawns, such as when children play on it, alter the surface soil and foster migration of loosened soil during rain events. The contaminated soil must be addressed to mitigate exposure risks to neighborhood children and other residents.

3. Unless the EPA continues this removal action, assistance will not otherwise be provided on a timely basis. Neither the State nor local governments have the funding to assume this removal action. Investigations into viable PRPs are ongoing but will take additional time and may require lengthy negotiations if such parties are identified. The Site is currently listed on the NPL and is undergoing an Engineering Evaluation/Cost Analysis (EE/CA) in preparation for filing a Record of Decision. Once filed and public comments are responded to, contracting mechanisms must be put in place before RSEB can mobilize and assume the response action. RSEB estimates approximately 12 months until that transition can occur. This time-critical removal action remains the only viable option to continue to abate the risks posed by the contaminated soil.

B. Consistency Exemption

1. On March 16, 2022, the site was listed on the NPL (*Federal Register* /Vol. 87, No. 51 /Part 52). Continued response actions at the time-critical removal described here are otherwise appropriate and consistent with the remedial action expected to be taken.

2. Based on conversations with the Remedial Project Manager and RSEB management, the removal action described here is consistent with, and substantially similar to, the expected remedial action for the Site. The removal action herein will not prevent implementation of any other foreseeable alternative remedial options that may be selected through the EE/CA process.

3. Further, the action is appropriate for the reasons described above in the Emergency Exemption section: there is an immediate risk requiring an immediate response that only ERRPPB can conduct.

VI. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed action description

Lead levels in surficial soil have been documented to be as high as 5,264 mg/kg. Based on bioavailability sampling data, the Region 4 SSS Section has provided a SSRG for lead of 400 mg/kg.

The EPA's proposed actions include the following:

a. Survey properties to verify current property boundaries, if not apparent;

b. Implement the Community Involvement Plan to ensure continued participation of affected residents and community leaders in the removal action;

c. Construct staging areas for Site activities such as soil stockpiling, equipment storage and office trailer locating;

d. Inventory existing plants, grasses, utilities and outbuildings on each property;

e. Remove impediments, as allowed, to provide for an appropriate excavation effort;

f. Excavate contaminated surficial soils at the Site until:

   i. the lead concentration in exposed soil as determined by in-situ XRF screening is less than the SSRG of 400 mg/kg, or

   ii. 24 inches of soil is excavated

   iii. If contamination at 24 inches remains, a geotextile fabric will be placed over the contaminated soil to warn against further intrusion past the barrier.

g. Backfill with clean soil, shape to original contours and lightly compact;

h. Replace or repair any EPA-damaged concrete, piping, fencing, outbuildings, etc;

i. Conduct in-situ screening and/or collect samples for ex-situ analysis as necessary;

j. Restore areas which are disturbed by the removal action to their pre-removal state to the maximum extent practicable;

k. If determined necessary by the OSC, construct or repair runoff control and water management devices or infrastructure to prevent flooding or other water impacts to property resulting from this removal action;

l. Monitor and sample ambient dust levels generated by the response actions to ensure no off-site impacts to nearby populations or property;

m. Arrange for off-site transportation and disposal/treatment of contaminated soil according to applicable regulations, including the CERCLA off-site rule;

n. Perform on-site treatment of characteristically hazardous waste, if appropriate;

o. Maintain Site security and limit access during implementation of the removal action;

p. Conduct all removal actions pursuant to an EPA-approved Health and Safety Plan;

q. Temporarily relocate residents, if necessary, during excavation activity; and,

r. Re-establish vegetation.

2. Contribution to remedial performance

The site was listed on the NPL on March 16, 2022. The actions proposed here will be consistent with the remedial action, and RSEB was consulted on the time-critical actions.

3. Engineering Evaluation/Cost Analysis (EE/CA)

This proposed action is time-critical and does not require an EE/CA.

4. Applicable or Relevant and Appropriate Requirements (ARARs)

In accordance with the NCP at 40 C.F.R. § 300.415(j), on-site removal actions conducted under CERCLA are required to attain ARARs to the extent practicable, considering the exigencies of the situation, or provide grounds for invoking a CERCLA waiver under Section 121(d)(4).

A letter to the State of Georgia requesting identification of State ARARs was sent on August 1, 2019. On September 6, 2019, GA EPD provided a list of proposed ARARs for the Site. The EPA accepted some of the ARARS; others were beyond the scope of this removal action. Both responses are available in the Administrative Record. A table summarizing the ARARs was included in the September 18, 2020, Action Memoranda.

Under CERCLA Section 121(e)(1), federal, state or local permits are not required for the portion of any removal or remedial action conducted entirely on-site as defined in 40 C.F.R. § 300.5. See also 40 C.F.R. §§ 300.400(e)(1) & (2). On-site means the areal extent of contamination and all suitable areas in very close proximity to the contamination necessary for implementation of the response action. On-site response actions must comply, to the extent practicable, with substantive, but not administrative, requirements of ARARs. Off-site activities such as transportation and disposal of wastes are required to comply with all applicable requirements, including the administrative portions.

While not ARARs specifically, CERCLA Section 121(d)(3) and the Off-site Rule at 40 C.F.R. 300.440, require the off-site transfer of any hazardous substance, pollutant or contaminant generated during the response action be sent to a treatment, storage or disposal facility that complies with applicable federal and state laws and is approved by the EPA for acceptance of CERCLA waste.

5. Project schedule

Removal activities are ongoing; all required resources are already mobilized. RSEB expects to assume management of the project by July 1, 2023. This Action Memorandum ceiling increase is designed to fund site activities to that time, as well as for several months past that date to account for contracting or funding delays RSEB may encounter. The costs presented in this ceiling increase are expected to authorize funding until December 31, 2023.

B. Estimated Costs

The funding request below is expected to fund the project until December 31, 2023, approximately 18 months. This coincides with RSEB's timeline for mobilization under a remedial action plus a 6-month contingency period. If the Remedial Action is delayed, ERRPPB will revisit continued funding of this project under the removal action. These costs include overhead (e.g., maintenance of staging areas, outreach) over the same time period. Sampling activities continue under RSEB through separate funding.

Extramural Costs:	***Current Ceiling***	***Proposed Ceiling***
Regional Allowance Costs:		
ERRS	$ 15,350,000	$ 23,932,000
START	$ 1,550,000	$ 1,750,000
Subtotal, Extramural Costs:	$ 16,900,000	$ $25,682,000
10% Contingency	$ 1,095,000	$ $2,568,000
TOTAL EXTRAMURAL COSTS:	**$ 17,995,000**	**$ $28,250,000.00**

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

If this response action is significantly delayed or not taken, ongoing actual or potential exposure of the public will continue.

VIII. OUTSTANDING POLICY ISSUES

No outstanding policy issues have been determined at this time.

IX. ENFORCEMENT

Enforcement activities have been initiated and are ongoing. See Attachment 3, "Enforcement Addendum," for more detailed information.

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 **$47,266,338** using the following formula[3]:

Direct Costs	Total Extramural Costs	$	28,250,000
	+ Total Intramural Costs	$	1,200,000
	Total Direct Costs	$	29,450,000
+ Indirect Costs	+ 62.26%	$	18,335,570
	Total EPA Costs	**$**	**47,785,570**

[3] 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 directs 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.

X. RECOMMENDATION

This decision document represents the selected removal action for the Westside Lead Site in Atlanta, Fulton County, Georgia, developed in accordance with CERCLA as amended, and not inconsistent with the NCP. The document is based on the Administrative Record for the Site.

Conditions at the Site meet NCP Section 300.415 (b)(2) criteria for a time-critical removal action. This time-critical removal action is anticipated to be fund-lead with a total project ceiling of **$28,250,000** funded through the Regional Removal Allowance.

Monell, Carol Digitally signed by Monell, Carol Date: 2022.05.17 16:55:30 -04'00'

APPROVED: _____ DATE: _____

Carol J. Monell, Director
Superfund & Emergency Management Division

DISAPPROVED: _____ DATE: _____

Carol J. Monell, Director
Superfund & Emergency Management Division

Attachments:
1. Environmental Justice EJSCREEN
2. Site Map
4. Enforcement Addendum (Confidential)

ATTACHMENT 1
Environmental Justice EJSCREEN

EJScreen Report (Version 2.0)

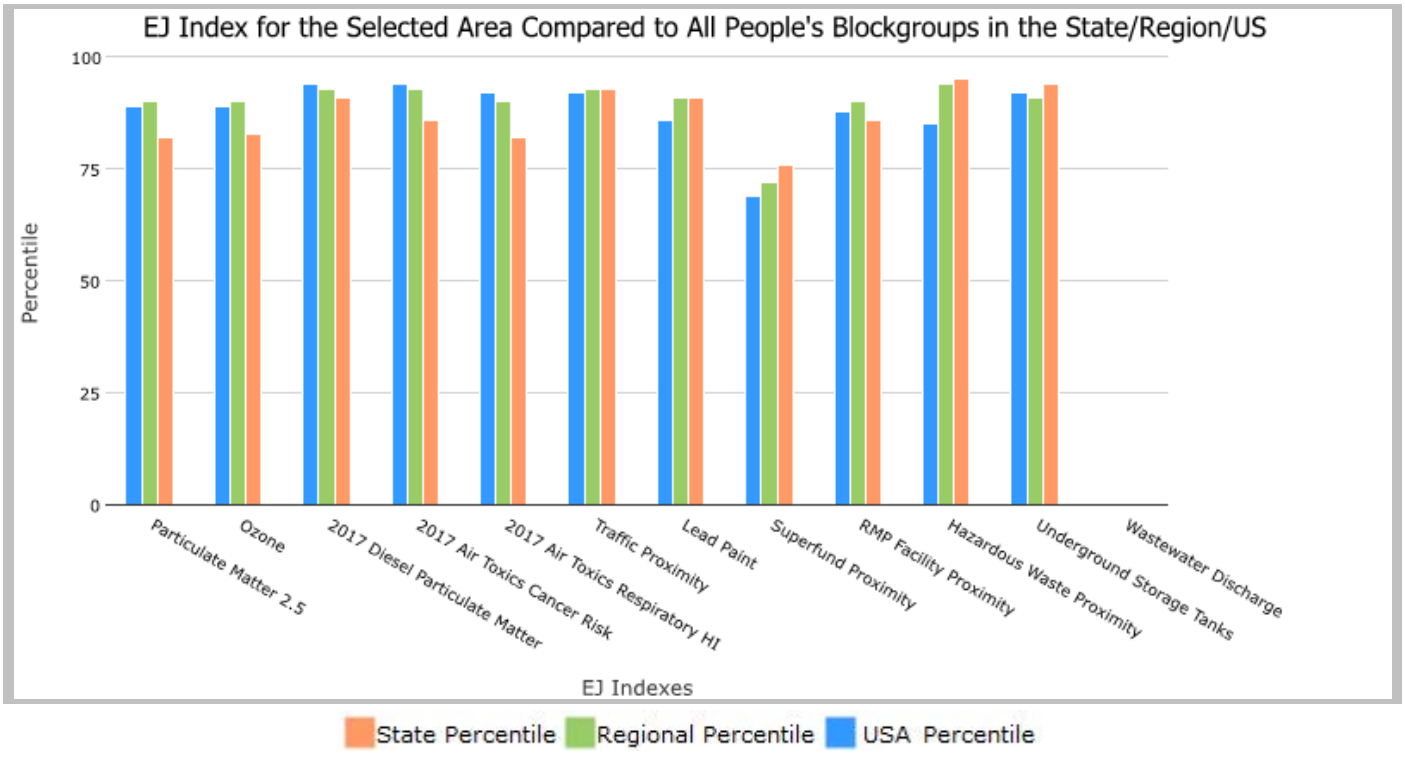
the User Specified Area, GEORGIA, EPA Region 4

Approximate Population: 6,550

Input Area (sq. miles): 1.03

Westside Lead

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
Environmental Justice Indexes			
EJ Index for Particulate Matter 2.5	82	90	89
EJ Index for Ozone	83	90	89
EJ Index for 2017 Diesel Particulate Matter*	91	93	94
EJ Index for 2017 Air Toxics Cancer Risk*	86	93	94
EJ Index for 2017 Air Toxics Respiratory HI*	82	90	92
EJ Index for Traffic Proximity	93	93	92
EJ Index for Lead Paint	91	91	86
EJ Index for Superfund Proximity	76	72	69
EJ Index for RMP Facility Proximity	86	90	88
EJ Index for Hazardous Waste Proximity	95	94	85
EJ Index for Underground Storage Tanks	94	91	92
EJ Index for Wastewater Discharge	N/A	N/A	N/A



This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

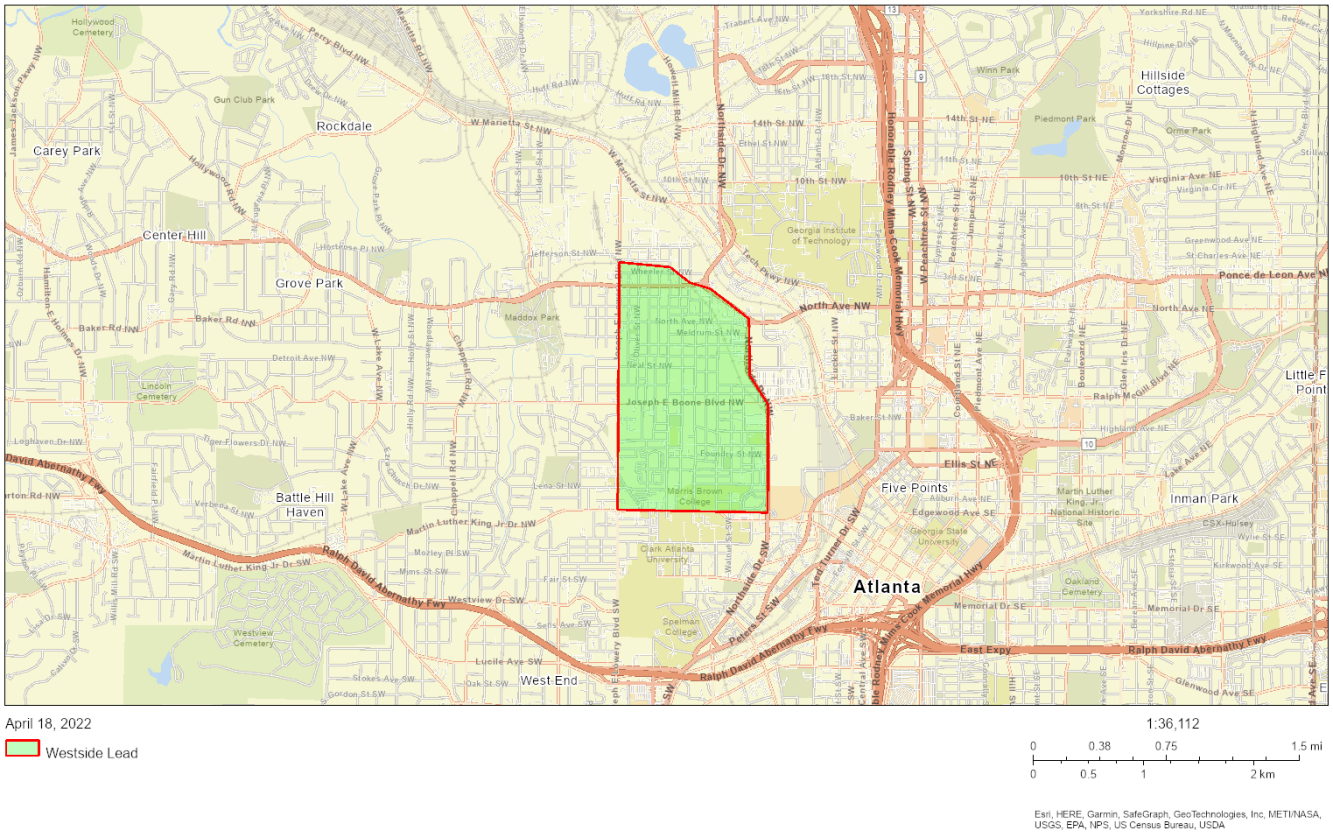
EJScreen Report (Version 2.0)

the User Specified Area, GEORGIA, EPA Region 4

Approximate Population: 6,550

Input Area (sq. miles): 1.03

Westside Lead



Sites reporting to EPA	
Superfund NPL	1
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	0

EJScreen Report (Version 2.0)

the User Specified Area, GEORGIA, EPA Region 4

Approximate Population: 6,550

Input Area (sq. miles): 1.03

Westside Lead

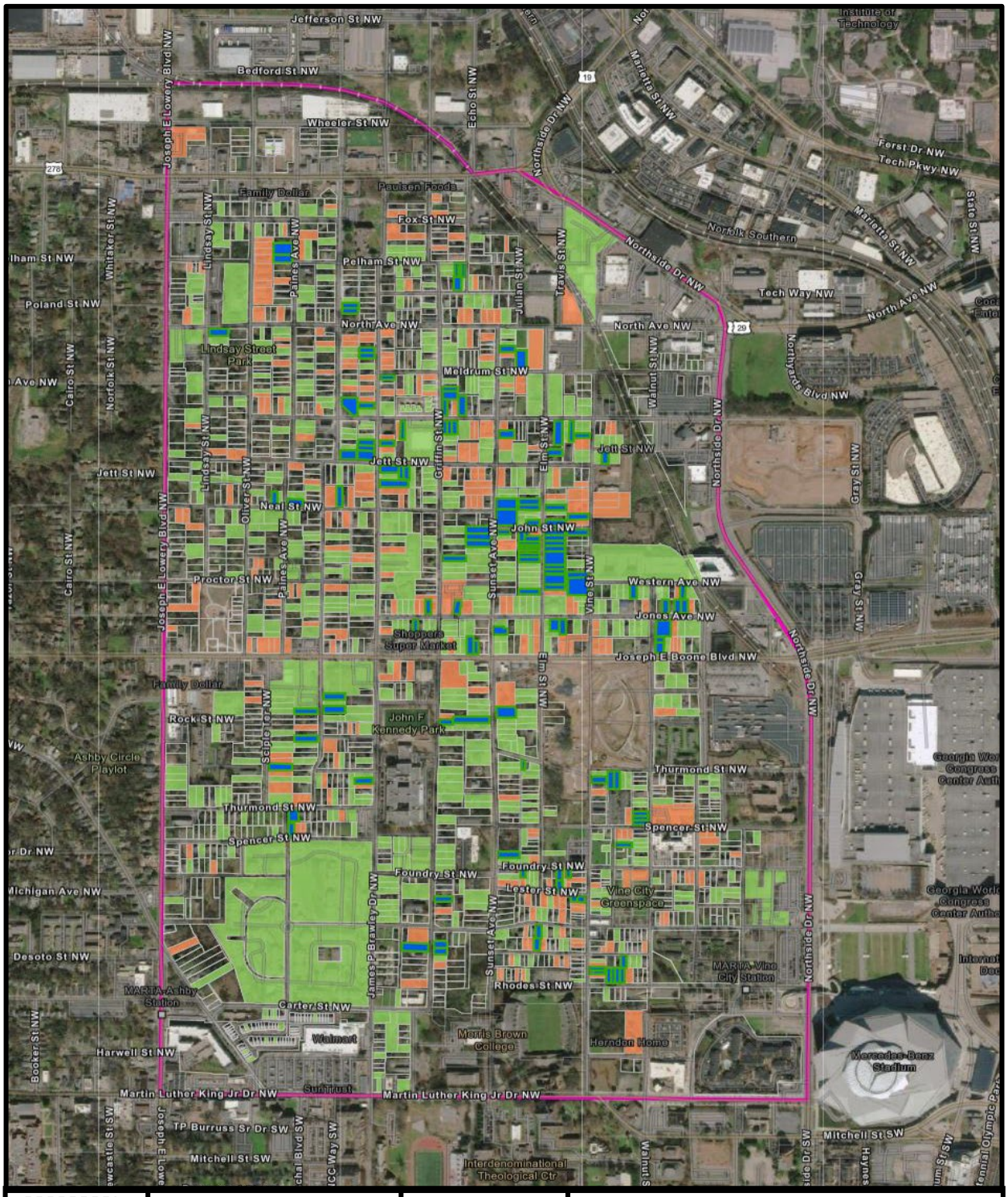
Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Pollution and Sources							
Particulate Matter 2.5 (µg/m^3)	9.58	8.94	88	8.18	94	8.74	76
Ozone (ppb)	43.1	39.4	96	37.9	88	42.6	59
2017 Diesel Particulate Matter* (µg/m^3)	0.592	0.294	95	0.261	95-100th	0.295	90-95th
2017 Air Toxics Cancer Risk* (lifetime risk per million)	47	36	98	31	95-100th	29	95-100th
2017 Air Toxics Respiratory HI*	0.5	0.46	91	0.4	95-100th	0.36	95-100th
Traffic Proximity (daily traffic count/distance to road)	990	520	89	430	89	710	82
Lead Paint (% Pre-1960 Housing)	0.29	0.13	88	0.15	84	0.28	63
Superfund Proximity (site count/km distance)	0.012	0.037	45	0.083	13	0.13	6
RMP Facility Proximity (facility count/km distance)	0.88	0.63	77	0.6	78	0.75	73
Hazardous Waste Proximity (facility count/km distance)	1.7	0.42	94	0.62	89	2.2	66
Underground Storage Tanks (count/km^2)	6.8	2.1	93	3.5	85	3.9	83
Wastewater Discharge (toxicity-weighted concentration/m distance)	N/A	0.079	N/A	0.45	N/A	12	N/A
Socioeconomic Indicators							
Demographic Index	80%	41%	95	37%	96	36%	95
People of Color	93%	47%	91	39%	93	40%	91
Low Income	66%	34%	92	35%	92	31%	92
Unemployment Rate	8%	6%	76	6%	76	5%	78
Linguistically Isolated	0%	3%	52	3%	51	5%	45
Less Than High School Education	13%	13%	60	13%	60	12%	65
Under Age 5	9%	6%	77	6%	80	6%	78
Over Age 64	9%	14%	28	17%	18	16%	22

*Diesel particular matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's 2017 Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: https://www.epa.gov/haps/air-toxics-data-update.

For additional information, see: www.epa.gov/environmentaljustice

EJScreen is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJScreen documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJScreen outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.

ATTACHMENT 2
Site Map



N

SCALE
0 ft 250 500

LEGEND

- Site Boundary
- Pb < 400 mg/kg
- Pb > 400 mg/kg (Not Remediated)
- Pb > 400 mg/kg (Completed)

Property without shading has not been sampled.

ATTACHMENT 2

SITE LOCATION MAP

WESTSIDE LEAD SITE

ATLANTA, FULTON COUNTY, GEORGIA

ATTACHMENT 3
Enforcement Addendum (Confidential)

Note: Due to the CONFIDENTIAL nature of the material, the Enforcement Addendum has been withheld. Withheld material is available, for Judicial review only, in the Records Center at EPA Region IV, Atlanta, Georgia.