EPA United States Environmental Protection Agency

Office of Public Affairs
Region 5
77 West Jackson Blvd.
Chicago, IL 60604

Illinois Indiana
Michigan Minnesota
Ohio Wisconsin

PROPOSED PLAN

Scrap Processing Superfund Site

Medford, Wisconsin
August 1997

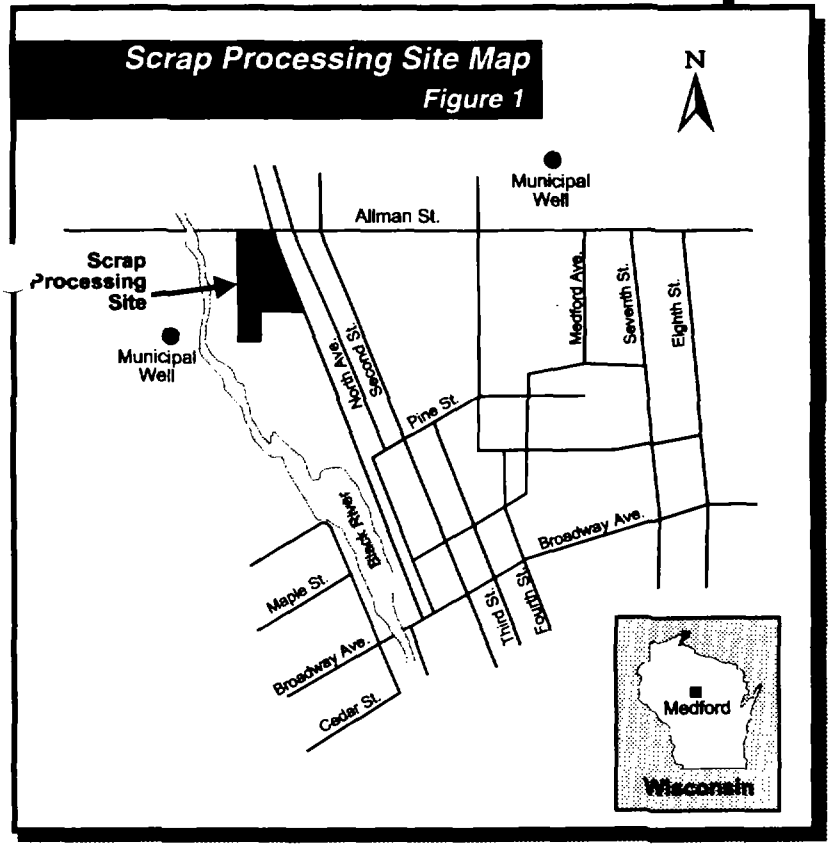
Public Comment Period

U.S. EPA will accept written comments on the Proposed Plan during a public comment period, August 25 to September 24, 1997.

Public Meeting

U.S. EPA will hold a public meeting to explain the Proposed Plan and the other cleanup alternatives considered for the site. Oral and written comments will be accepted at the meeting.

Date: September 16, 1997
Time: 7 p.m.
Place: Taylor County
Multi-Purpose Building
County Fairgrounds
Medford, Wisconsin



Introduction

The Proposed Plan identifies the U.S. Environmental Protection Agency (U.S. EPA) final cleanup recommendation for the Scrap Processing Superfund site in Medford, Wisconsin (Figure 1). U.S. EPA recommends excavating lead-contaminated soil and transporting it to an off-site solid waste landfill for disposal, ground-water monitoring to determine if there is need for additional actions, and institutional controls. U.S. EPA's recommendation (referred to as Alternative E) is based on information collected during the site remedial investigation (RI), feasibility study (FS), and a risk assessment, which evaluated potential health risks posed by high lead levels at the site.

This fact sheet summarizes site background information and presents the rationale for the U.S. EPA cleanup recommendation.[1] It also outlines the public's role in helping U.S. EPA and the Wisconsin Department of Natural Resources (WDNR) make a final site cleanup decision. Public input on the U.S. EPA recommendation is an important part of the decision-making process. Based on new information or public comment, U.S. EPA may change the recommendation for the site.

[1] Section 117(a) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) requires publication of a notice and a Proposed Plan for possible site remediation. The Proposed Plan must also be made available to the public for comment. This Proposed Plan is a summary of information included in the *Focused RI/FS* (August 1997) and other documents in the Administrative Record for the site. Please consult the *Focused RI/FS*, along with the Administrative Record for the site, for more detailed information.

Site Background

The Scrap Processing Company, 510 West Allman Street, Medford, Wisconsin, is an operating salvage yard and recycler that recycled car batteries from 1959 to the early 1980s. During that time, used batteries were processed in the on-site battery-cracking building. At the peak of its operations, Scrap Processing cracked 8,000 to 10,000 batteries per month. Lead was removed from the batteries and sent off site; battery cases were discarded. During battery cracking operations, battery acid contaminated with lead and other hazardous compounds was released to a ditch and an unlined lagoon at the site. A berm built to contain waste acid occasionally failed, allowing the acid to run across the ground and into the Black River.

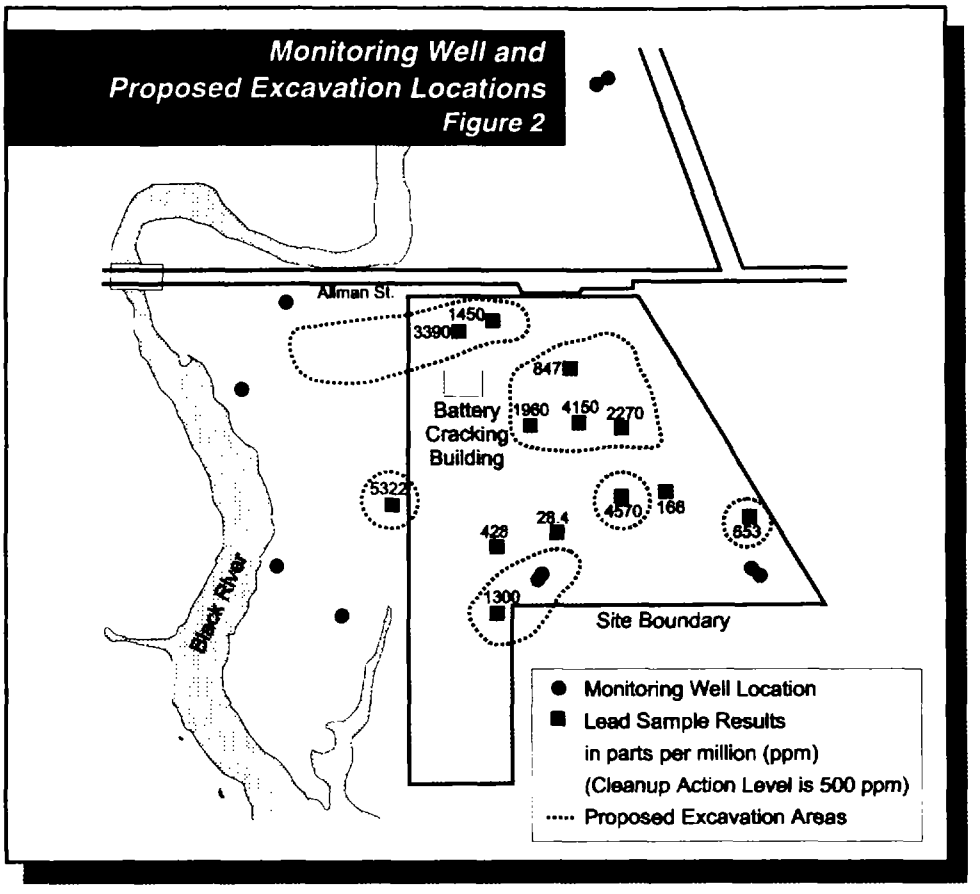
Before the Superfund law went into effect in 1980, battery cracking operations, such as those at Scrap Processing, took place and did not violate environmental laws. After the Superfund law was passed, it was determined that these activities, conducted as they were at the Scrap Processing site, were harmful to human health and the environment.

In September 1984, U.S. EPA placed the Scrap Processing site on the National Priorities List, a roster of hazardous waste sites eligible for cleanup under the Superfund program.

Previous Removal Actions

In January 1983, WDNR obtained a court order requiring Scrap Processing Company to clean up its battery cracking operation. The order called for an immediate cleanup of the most highly contaminated site areas to protect human health and the environment from further contamination.

Monitoring Well and Proposed Excavation Locations
Figure 2



Superfund is the more common name for the Comprehensive Environmental Response, Compensation, and Liability Act. This law authorizes the federal government to respond directly to releases (or threatened releases) of hazardous substances that may endanger public health, welfare, or the environment. U.S. EPA is responsible for managing the Superfund program.

In compliance with the court order, cleanup operations began at the site in June 1984. The on-site pond was drained, and WDNR oversaw the removal of some contaminated soil and sediment, which was sent off site to a hazardous waste landfill. Soil removal continued into 1987.

In May 1990, a leaking 10,000-gallon underground storage tank that contained leaded gasoline was removed, and 50 cubic yards of contaminated soil were excavated and stockpiled on site. Although these were positive steps toward total site cleanup, more work was needed.

Note: Soils stockpiled at the site entrance contain petroleum products, such as gasoline compounds. The WDNR Leaking Underground Storage Tank (LUST) Program will address cleanup of this soil and other areas affected by gasoline compounds from underground storage tanks at the site. The

LUST Program will take this action because petroleum products are not covered (or are exempt) under federal Superfund law.

In May 1992, U.S. EPA began investigating the site at the request of local health officials. U.S. EPA collected soil, surface water, sediment, and ground-water samples at on- and off-site locations. Test results from these samples showed that contamination was more widespread than previously thought and immediate actions were necessary.

Beginning in September 1993, U.S. EPA excavated approximately 300 cubic yards of soil contaminated with lead and polychlorinated biphenyls (PCBs) from the area surrounding the former battery-cracking building. Excavated soil was transported by truck to licensed hazardous waste disposal facilities.

As part of that September removal action, approximately 1,500 gallons of wastewater were sent to an off-site wastewater treatment plant.

In addition to removal actions at the site, U.S. EPA installed 12 monitoring wells and completed 25 soil borings (holes dug in the ground) at various locations on and off site (Figure 2). Subsurface soil samples from these borings were collected and analyzed in September 1993 to determine the amount of remaining site contamination and the most appropriate way to clean up the site.

Several additional rounds of ground-water samples were taken in 1993, 1994, and 1996.[2] Sampling results showed low concentrations of volatile organic compounds (VOCs) and metals in the ground water. At WDNR's request, U.S. EPA did additional sampling using a Geoprobe, a sampling device mounted on the back of a van or pickup truck. Samples were collected around the battery-cracking area. These samples showed high concentrations of lead in the ground water. Because of these high lead levels, WDNR expressed concern that State ground-water standards may not be met. U.S. EPA responded to this concern by including a long-term, ground-water monitoring program to determine if there is need for possible additional actions. This monitoring program is part of all cleanup alternatives except Alternative A: No Action.

Summary of Site Risks

During the Focused RI/FS, U.S. EPA determined which chemicals at the site pose threats to human health and the environment. Lead has become the primary focus of U.S. EPA's cleanup effort.

Lead can only have adverse health effects if people are exposed to it. Being exposed to lead at the Scrap Processing site means having contact with lead-contaminated soil. If exposed to contaminated soil, a person may ingest lead by inhaling airborne soil particles or by unintentionally eating the soil. People could be exposed to lead at the Scrap Processing facility in areas of contaminated soil that are not covered by grass, a concrete or asphalt driveway, or a sidewalk.

Based on WDNR regulations, the cleanup level for lead in an industrial area is 500 parts per million (ppm). At Scrap Processing, lead levels were as high as 5300 ppm. It has also been determined that cleanup alternatives developed for lead-contaminated soils will address the other minor contaminants in those areas.

Summary of Alternatives

As part of the Focused RI/FS, U.S. EPA identified and evaluated alternatives that could be used to address threats or potential threats posed by the site. About 7,740 cubic yards of soil would be excavated. U.S. EPA considered five cleanup alternatives for lead-contaminated soils at the site:

Alternative A: No Action
Alternative A involves leaving the site "as is." No deed restrictions or cleanup action would be taken at contaminated areas. This alternative would not reduce threats to human health and the environment at the site. The inclusion of the no-action alternative is required by law to give U.S. EPA a basis for comparison.
•Estimated Cost: $0

[2] *These sampling activities were initiated using U.S. EPA "removal" authority. (Removal authority allows U.S. EPA to move quickly to address an immediate threat to human health or the environment. When an immediate threat does not exist, U.S. EPA uses its "remedial" authority to address site cleanup. Remedial authority allows U.S. EPA to develop long-term site cleanup actions.) At the Scrap Processing site, U.S. EPA anticipated using its removal authority to draft a document called an engineering evaluation/cost analysis based on sampling activities. As site studies progressed, however, U.S. EPA determined that facility conditions would be better addressed using U.S. EPA's remedial authority. As a result of this decision, U.S. EPA drafted a Focused RI/FS.*

Alternative B: Consolidation and On-Site Disposal
Alternative B involves excavation and consolidation of the lead-contaminated soils into one area on site. A cell (an area to contain contaminated soils) would be constructed and lined. Contaminated soils would be deposited on top of the liner. A multi-layered clay cap would be placed over the consolidated soils. The cap would reduce potential contact with contaminated soils and minimize surface vater infiltration. Drainage controls, vegetation, security fencing, deed restrictions, and inspection and maintenance programs would be implemented to maintain the cap. This alternative includes long-term ground-water monitoring and assessment.
•Estimated Cost: $4 million

Alternative C: Excavation and On-Site Treatment by Metal Recovery Process
Alternative C involves excavation of lead-contaminated soils and treatment using a lead removal process. The lead removal process is an innovative technology that draws (leaches) lead from contaminated soils and then recovers it from the leaching solution. Recovered lead would be suitable for recycling. Treated (clean) soil would be returned to excavated areas. This alternative includes long-term, ground-water monitoring and assessment.
•Estimated Cost: $5 million

Alternative D: Consolidation and On-Site Containment by Concrete Paving
Alternative D involves consolidation of lead-contaminated soils and permanent concrete paving over the consolidated soils. Lead-contaminated soils in the southern and western portions of the site would be excavated and relocated to the northern portion of the site, which would be paved with wire-reinforced concrete. Paving would protect human health and the environment, as well as provide a stable working surface for current site operations. This alternative also includes drainage and stormwater controls, site security fencing, deed restrictions, long-term ground-water monitoring and assessment, and pavement inspection and maintenance.
•Estimated Cost: $3 million

What if the lead in the soil turns out to be hazardous?
U.S. EPA conducted an emergency removal action at the site in 1993. Based on this action, U.S. EPA assumes lead-contaminated soils remaining on site can be classified as nonhazardous. However, testing will be done to make sure on-site soils fit the nonhazardous classification. If some do not, a supplemental "treatment by stabilization" option for lead-contaminated soils could be added to Alternatives B, D, or E. (Treatment by stabilization means drawing lead from the soil or adding a substance, such as cement, to the soil to prevent the lead from leaving the soil.) Stabilization would render the soils nonhazardous, so they could be managed as outlined in Alternatives B, D, or E.

Alternative E: Excavation and Off-Site Landfill Disposal
Alternative E involves excavation of lead-contaminated soils and their transport to a licensed off-site solid waste landfill for disposal. Sampling would be required to verify the waste meets landfill requirements. Excavated site areas would be backfilled with clean soil. This alternative also includes vegetation over the excavated areas, a site security fence, deed restrictions, and long-term ground-water monitoring and assessment.
•Estimated Cost: $2 million

The Focused RI/FS report provides a more detailed description of each alternative. This report is in the Medford Public Library.

WDNR Concurrence

WDNR accepts U.S. EPA's recommended cleanup alternative for soils at the Scrap Processing site. For the ground water, WDNR believes its regulations will be more appropriately addressed by the evaluation of information gathered in the monitoring program. After 5 years, a review of the site ground-water monitoring data will be used to evaluate the effectiveness of the soil cleanup action and the need for possible additional actions.

The Next Step

Before selecting a final site cleanup plan, U.S. EPA will consider public comments received during the public comment period (August 25 to September 24). The cleanup plan will be described in a final decision document, called a Record of Decision, which will be available for public review.

Public Comment Sheet

Your input on U.S. EPA's Proposed Plan for the Scrap Processing Superfund site is important. Public comments assist U.S. EPA in selecting its final cleanup plan.

You may use the space below to write your comments about U.S. EPA's Proposed Plan. Comments must be postmarked by September 24, 1997. If you have questions about the comment period, contact Susan Pastor at 312-353-1325 or 1-800-621-8431. Those with electronic communications capabilities may submit their comments to U.S. EPA via the Internet at the following address: pastor.susan@epamail.epa.gov

Name:_____

Address:_____

City:_____

State:_____ Zip:_____

Scrap Processing Superfund Site

Public Comment Sheet

Fold on Dashed Lines, Staple, Stamp, and Mail

Name_____

Address_____

City_____ State____

Zip_____

Place Stamp Here

Susan Pastor (P-19J)
Community Involvement Coordinator
Office of Public Affairs
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, IL 60604

Evaluation Criteria

U.S. EPA used the following nine criteria to evaluate each alternative. The Evaluation Table (Figure 3) compares the alternatives to these criteria.

1. Overall Protection of Human Health and the Environment determines whether an alternative eliminates, reduces, or controls threats to public health and the environment through institutional controls, engineering controls, or treatment.

2. Compliance with Applicable or Relevant and Appropriate Requirements (ARARs) evaluates whether the alternative meets federal and state environmental statutes, regulations, and other requirements that pertain to the site or whether a waiver is justified.

3. Long-Term Effectiveness and Permanence considers the ability of an alternative to maintain protection of human health and the environment over time and the reliability of such protection.

4. Reduction of Contaminant Toxicity, Mobility, or Volume Through Treatment evaluates an alternative's use of treatment to reduce the harmful effects of principal contaminants, their ability to move in the environment, and the amount of contamination present.

5. Short-Term Effectiveness considers the length of time needed to implement an alternative and the risks the alternative poses to workers, residents, and the environment during implementation.

6. Implementability considers the technical and administrative feasibility of implementing the alternative, such as relative availability of goods and services.

7. Cost includes estimated capital and operation and maintenance costs, as well as present worth costs. Present worth cost is the total cost of an alternative over time in terms of today's dollars.

8. State Acceptance considers whether the state agrees with U.S. EPA's analyses and recommendations of the Focused RI/FS and the Proposed Plan.

9. Community Acceptance will be addressed in the Record of Decision. Community acceptance of the recommended cleanup action will be evaluated after the public comment period and before the Record of Decision is issued. Public comments and U.S. EPA responses to those comments will be presented in the responsiveness summary, which will be attached to the Record of Decision.

Evaluation Table
Figure 3

Evaluation Criteria	Alternative A No Action	Alternative B	Alternative C	Alternative D	Alternative E
1. Overall Protection of Health & Environment	□	■	■	■	■
2. Compliance with ARARs	□	■	■	■	■
3. Long-term Effectiveness and Permanence	□	■	■	■	■
4. Reduction of Toxicity, Mobility, or Volume through Treatment	□	❖	■	❖	❖
5. Short-term Effectiveness	□	■	■	■	■
6. Implementability	NA	■	■	■	■
7. Cost	$0	$4 million	$5 million	$3 million	$2 million
8. Support Agency Acceptance	The Wisconsin Department of Natural Resources has reviewed the components of the recommended alternative and supports its acceptance.				
9. Community Acceptance	Community acceptance of the recommended alternative will be evaluated after the public comment period.				

■ - Fully meets criteria ❖ - Partially meets criteria

□ - Does not meet criteria NA - Not Applicable

U.S. EPA Recommended Alternative

U.S. EPA recommends Alternative E: Excavation and Off-Site Landfill Disposal. Alternative E would protect human health and the environment, provide long-term effectiveness, comply with state and federal environmental regulations, be implementable, and cost effective. Long-term ground-water monitoring and institutional controls, such as ground-water and land-use restrictions, would be implemented.

U.S. EPA will review future ground-water monitoring data to determine the effectiveness of site cleanup and the need for possible additional actions.

Additional Information

If you have questions about the information in this fact sheet or would like additional information about the Scrap Processing Proposed Plan, please contact the individuals listed below.

U.S. EPA Contacts

Susan Pastor (P-19J)
Community Involvement Coordinator
(312) 353-1325
pastor.susan@epamail.epa.gov

Pablo Valentin (SR-6J)
Remedial Project Manager
(312) 353-5592
valentin.pablo@epamail.epa.gov

Toll-Free: 1-800-621-8431
U.S. Environmental Protection Agency
77 West Jackson Boulevard
Chicago, Illinois 60604

State of Wisconsin Contacts

Terry Koehn
State Project Manager
(715) 635-4048
Wisconsin Department of Natural Resources
Northern District
810 West Maple Street
Spooner, Wisconsin 54801
koehnt@dnr.state.wi.us

Henry Nehls-Lowe
Epidemiologist
(608) 266-3479
Wisconsin Division of Health
1414 East Washington Avenue
Madison, Wisconsin 53703-3044
nehlshl@dhfs.state.wi.us

The Proposed Plan, Focused RI/FS, Community Involvement Plan, fact sheets, and other site-related information will be available for review in the **site information repository** at the **Medford Public Library**, 104 East Perkins Street, Medford. An administrative record, which contains the documents upon which U.S. EPA will base its decision, has also been placed at the library. Documents in the repository and the administrative record are to be treated as reference material and are not to be removed from the library.

EPA

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