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SIXTH FIVE-YEAR REVIEW REPORT FOR UNITED SCRAP LEAD CO., INC. SUPERFUND SITE MIAMI COUNTY, OHIO

Prepared by

U.S. Environmental Protection Agency
Region 5
Chicago, Illinois

4/7/2026

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Michael D. Harris, Director
Superfund & Emergency Management Division
Signed by: THOMAS SHORT

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LIST OF ABBREVIATIONS & ACRONYMS

ARAR	Applicable or Relevant and Appropriate Requirement
CD	Consent Decree
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
COC	Contaminant of Concern
EC	Environmental Covenant
EPA	United States Environmental Protection Agency
FPDWS	Federal Primary Drinking Water Standards
FCOR	Final Closeout Report
FYR	Five-Year Review
ICs	Institutional Controls
mg/kg	Milligrams per Kilogram
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
NPL	National Priorities List
O&M	Operation and Maintenance
Ohio EPA	Ohio Environmental Protection Agency
OU	Operable Unit
PCOR	Preliminary Close-Out Report
PRP	Potentially Responsible Party
RA	Remedial Action
RAO	Remedial Action Objective
RCRA	Resource Conservation and Recovery Act
RD	Remedial Design
RI/FS	Remedial Investigation/Feasibility Study
ROD	Record of Decision
RPM	Remedial Project Manager
Site	United Scrap Lead Co., Inc. Superfund Site
TCLP	Toxicity Characteristic Leaching Procedure
USACE	U.S. Army Corps of Engineers
USL	United Scrap Lead Co., Inc
UU/UE	Unlimited Use/Unrestricted Exposure
WACO	Weaver Aircraft Company of Ohio

I. INTRODUCTION

The purpose of a Five-Year Review (FYR) is to evaluate the implementation and performance of a remedy in order to determine if the remedy is and will continue to be protective of human health and the environment. The methods, findings, and conclusions of reviews are documented in FYR reports such as this one. In addition, FYR reports identify issues found during the review, if any, and document recommendations to address them.

The United States Environmental Protection Agency (EPA) has prepared this FYR pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 121, consistent with the National Oil and Hazardous Substances Pollution Contingency Plan (NCP)(40 CFR Section 300.430(f)(4)(ii)) and considering EPA policy.

This is the sixth FYR for the United Scrap Lead Co., Inc. (USL) Superfund Site (Site). The triggering action for this statutory review is the signing of the previous FYR on April 9, 2021. The FYR has been prepared due to the fact that hazardous substances, pollutants, or contaminants remain at the Site above levels that allow for unlimited use and unrestricted exposure (UU/UE).

The Site consists of one operable unit (OU1) for the entire Site, which will be addressed in this FYR. OU1 addresses the soil remedy and monitoring of groundwater.

The Site FYR was led by Katherine Thomas, Remedial Project Manager (RPM), EPA Region 5. Participants included Ohio Environmental Protection Agency (Ohio EPA) Division of Environmental Response and Revitalization Project Manager, and the EPA Community Involvement Coordinator. The landowners and Weaver Aircraft Company of Ohio (WACO) Historical Society were notified of the initiation of the FYR. The review began on May 15, 2025.

Site Background

The Site is located at 1425 County Road 25-A (South Dixie Highway), P.O. Box 25, in the City of Troy, Concord Township, Miami County in Ohio. Appendix 2 shows a map of the Site and surrounding areas. The Site is located in a lightly populated area. The former USL property occupies about 25 acres of land, of which eight acres were the scope of the remedial action (RA) completed in 1999. The northern boundary of the Site is bordered by a gravel road, and lands to the north of the Site include an airfield and historical museum. The eastern edge is bordered by wooded areas and railroad lines. The southern boundary of the Site is a channel, sometimes referred to as the “McKaig Ditch” or “Tributary to Island 3,” that drains to the Great Miami River. The western edge is bordered by four residential/business properties and by County Road 25-A. The Site lies within the flood plain of the Great Miami River. Surface drainage at the Site is generally in a southeasterly direction towards a culvert that discharges into the channel that forms the southern boundary of the Site.

Starting in 1946, lead components from used automobiles and industrial batteries were transported to the Site. The lead components were then sold and shipped by rail to lead smelters for salvage. Battery tops and battery casing chips were disposed of on-site on the USL property. Battery acid was collected and discharged directly on the ground. The business was incorporated as USL in 1964. From 1966 through 1980, USL separated batteries from casings, severed the tops, collected the lead plates for

reprocessing, and then disposed of the tops and casings adjacent to the processing property on-site. The resulting acid was originally discharged directly to an acid seepage field. Starting in 1972, the resulting acid was collected, neutralized with ammonia and discharged to the acid seepage field. Ohio EPA first became concerned about conditions at the Site in 1979 when the State found levels of cadmium and lead in the groundwater on the USL property which exceeded the then interim Federal Primary Drinking Water Standards (FPDWS). The Ohio EPA required USL to comply with the State waste disposal regulations and dispose of the chipped battery casings off-site. Lead reclamation operations ceased in 1980 but resumed by 1982 when the Site was leased to new individuals. In 1983, lead battery reclamation activities ceased permanently. The Site was listed on the National Priority List (NPL) on September 21, 1984, and deleted from the NPL on September 14, 2021.

Historically the Site consisted of one parcel, however in 2024, the Site was divided into three parcels, with two parcels owned by the WACO Historical Society (C06-250206 and C06-250224) and one parcel owned by Wells Electric (C06-250222). All three parcels are subject to an Environmental Covenant (EC) in place for the Site. No occupied buildings are located on the Site. A fenced-in, secured and unoccupied utility shed operated by MetroNet is located on the western edge of the Site. A portion of the northwestern area of the Site is used for MetroNet utility maintenance vehicle parking and storage. Vegetation clearing, consistent with the EC in place on the northeastern portion of the Site, is ongoing in preparation for the extension of the WACO airfield runway. The remainder of the Site is vegetated.

SIXTH FIVE-YEAR REVIEW SUMMARY FORM

SITE IDENTIFICATION		
Site Name: United Scrap Lead Co., Inc.		
EPA ID: OHD018392928		
Region: 5	**State:** OH	**City/County:** Troy, Miami
SITE STATUS		
NPL Status: Deleted		
Multiple OUs? No	**Has the site achieved construction completion?** Yes	
REVIEW STATUS		
Lead agency: EPA		
Author name (Federal or State Project Manager): Katherine Thomas		
Author affiliation: EPA		
Review period: 5/15/2025 - 12/9/2025		
Date of site inspection: 2/3/2026		
Type of review: Statutory		
Review number: 6		
Triggering action date: 4/9/2021		

Due date *(five years after triggering action date)*: 4/9/2026

II. RESPONSE ACTION SUMMARY

Basis for Taking Action

Lead was selected as the primary Contaminant of Concern (COC) in soil and groundwater. Lead was detected in soils at the Site at levels significantly above background and was detected in a groundwater well at levels above the then interim FPDWS.

The 1988 Remedial Investigation (RI) Report (Camp Dresser & McKee, 1988) summarized the risks at the Site. The RI found that the battery casing stockpile was the primary source of contamination at the Site. Arsenic and antimony were found in the former process area at the Site, but not in other locations across the United Scrap Lead property. Arsenic and antimony were found to be co-located with the high levels of lead with lead being the driver for cleanup. Arsenic and antimony were therefore not deemed to be COCs based on the inconsistent levels across the Site. The human health and ecological risk assessments, included in the 1988 RI Report and in the 1988 Health Assessment for the Site (USDHHS/ USPHS/ ATSDR, 1988), found that direct and indirect contact to environmental media contaminated by a release from the Site had the potential to result in lead exposure from the inadvertent ingestion and inhalation of soil and dust by commercial/ industrial workers and nearby residential properties. Receptors included humans, animals, and plants. The potential also existed for an increased risk of exposure of the nearby population via the migration of contaminated media by flooding.

It was determined that removal of the source material (i.e., battery casing chips and lead-contaminated soils) from the Site and neighboring properties would also reduce the possibility that the source material could impact the groundwater aquifer and water supply to adjacent residences.

Response Actions

The EPA conducted an Emergency Removal Action at the Site from November 1985 through September 1986 to remove and relocate waste materials and contaminated soils away from the neighboring residences and the roadway. Waste removed from the neighboring properties and roadway was relocated to the battery waste pile at the source property. ATSDR recommended the 500 milligrams per kilogram (mg/kg) action level for removal of lead-contaminated soil from the neighboring residential and commercial properties, which was used as the clean-up level for the Removal Action (Weston, 1986). Waste relocated included rubber and plastic battery casing chips, pieces of the lead components from the batteries, lead paste and lead contaminated soils. In addition to the consolidated pile of waste battery casing chips and components, several abandoned buildings were located on the USL property. Accumulations of debris included empty drums, fiberglass tanks, vehicles, wooden pallets, and trash.

Following the 1985-1986 Removal Action, a remedy for the Site was selected in a 1988 Record of Decision (ROD) (EPA, 1988) and subsequently modified by a 1997 ROD Amendment (EPA, 1997), as discussed below.

Table 1: Soil Cleanup Levels for commercial and residential properties adjacent to the USL property during the 1985-1986 Removal Action

COC	Media	Clean-up level
Lead	Soil	500 mg/kg

1988 ROD:

The selected remedy for the Site involved the treatment of both battery casings and contaminated soils to remove and recycle lead. The major components of the Site remedy included:

- Excavation of soils from neighboring commercial and residential properties to be excavated and brought on the source property and placed with treated soils.
- Excavation of soils on the USL property with a concentration above 500 mg/kg lead would be treated (by washing with lead recovery) and the residual non-hazardous soils would be placed back on the former USL property ;
- Treat casings on the former USL property (washing with lead recovery) with off-site disposal of residuals, at a non- Resource Conservation and Recovery Act (RCRA) landfill, if a recycler cannot be found;
- Clean fill brought in to cover treated soils and revegetate;
- Sediments dewatered on the former USL property then placed with treated soils (covered with clean fill);
- Buildings/facilities, and debris decontaminated and disposed off-site (in a non-RCRA landfill);
- New residential well provided for Ishmael residence/USL office building;
- Minimal deed restrictions implemented;
- Site drainage controlled;
- Restrict Site access by installing perimeter fencing around the USL property; and
- Groundwater/surface water monitoring both, during RA and for a minimum of two years after to ensure that RA operations did not have negative impacts on groundwater or surface water.

Table 2: COC Cleanup Levels from 1988 ROD as clarified in 1990 pre-design investigations

COC	Media	Clean-up level
Lead	Residential Soil	210 mg/kg
Lead	USL Property Soils*	500 mg/kg
Lead	Groundwater	50 ppb**

* Excavated to a depth of five feet

**Groundwater monitoring action level

ppb = parts per billion

During the pre-design investigation in the fall of 1990, the EPA and Ohio EPA agreed that soil on the USL property below the battery casings chip waste pile would be excavated to the cleanup level of

500mg/kg of total lead. Soils from commercial and residential properties adjacent to the United Scrap Lead property above 210mg/kg would be excavated and brought to the USL property. Clean cover for the commercial and residential properties was required to have lead concentrations below 210mg/kg (Sverdrup, 1991). The 210mg/kg residential cleanup number is not documented in the ROD and was agreed on as part of the remedial design process.

1997 ROD Amendment:

The main source control component of the 1988 ROD, involving an innovative technology for treatment of the soils and battery casing chips on the USL property, was not implemented after pre-design. Pilot Plant and Economic studies indicated serious implementability issues and substantially higher costs. The selected modified remedy in the 1997 ROD Amendment addressed the remaining on-site lead-contaminated battery casing chips and soil. The scope of this selected remedy involved the following:

- Excavation of battery casing chips for treatment and disposal at an EPA-approved RCRA Subtitle D landfill;
- Excavation of the first foot of soils under the battery casing chips pile on the USL property that exceed 1550 mg/kg lead and that fail the Toxicity Characteristic Leaching Procedure (TCLP) standard, will be treated to meet RCRA Land Disposal Restrictions and disposed off-site in an approved RCRA Subtitle D solid waste landfill; and
- Construction of a solid waste cover system over the remaining contaminated soils on the USL property to ensure the future safety of the groundwater. If, however, all of the battery casing chips are removed and properly disposed of, so that all of the contaminated soils containing lead in excess of 1550 mg/kg are removed to the regional groundwater table and properly disposed of, then construction of a solid waste cover system would not be required.

Remedial Action Objectives (RAOs) were not specifically listed in the 1988 ROD or 1997 ROD Amendment. The following RAOs are inferred from the remedy and discussion in the 1988 ROD and 1997 ROD Amendment:

- Prevent lead exposure via inadvertent ingestion and inhalation of lead contaminated soil and dust;
- Prevent ingestion of lead contaminated groundwater by preventing migration of lead into the groundwater aquifer and water supply to adjacent properties; and
- Prevent exposure to lead contaminated soils that may result in adverse health effects by limiting land use to commercial/industrial activity.

The final COC cleanup levels established in the 1997 ROD Amendment for the USL source property are provided in Table 3 below.

Table 3: Cleanup Levels from 1997 ROD Amendment for COCs at the USL Property

COC	Media	Clean-up level
Lead	Soil	1550 mg/kg
Lead	Groundwater	50 ppb*

Status of Implementation

On September 12, 1991, an Administrative Order by Consent was executed under which certain Potentially Responsible Parties (PRPs) constructed a fence around the perimeter of the USL property to prohibit access and eliminate direct contact with the hazardous materials at the Site.

In August 1992, the EPA implemented components of the 1988 ROD selected remedy, while other components were being reconsidered based on the pre-design investigations and new cost estimates. The first phase of the RA ("Phase I - RA") addressed the neighboring contaminated residential/commercial areas, secured soils and battery casing chips on the former USL properties, and secured other site-related areas, so that neither the public health nor the environment would be adversely affected while the remedy was being reconsidered.

The Phase I - RA was conducted by the Unites States Army Corps of Engineers (USACE), through an interagency agreement with EPA, and was completed in March 1995. The Phase I - RA included the following activities:

- Excavation of soils at residential/commercial properties adjacent to the former USL property: contaminated soils with lead concentration levels above 210 mg/kg were removed in areas of concern, including the backyard of a nearby residence (Appendix 2 Figure 4), the lot of a nearby used car business, and along the former USL Site access road. These soils were combined with materials at the source property. Verification sampling was performed once excavation was completed.
- Replacement of excavated soils: residential/commercial property contaminated soils that were excavated were replaced with clean soils with lead concentrations between 4 and 12 mg/kg (OHM, 1995) and returned to original grade and vegetation.
- Cover soils and battery casing chips: Stockpiled soils and battery casing chips were covered with dust control tarpaulins as a temporary measure. Subsequently in 1996, one year after this action was taken, the stockpiled soils and battery casing chips were leveled out over the existing area of contaminated soils.
- Installation of residential well: A new residential well was installed to service an adjacent residence. The newly installed residential well was sampled to ensure proper installation.
- Decontamination, removal and disposal: Two USL buildings were decontaminated, removed, and disposed of off-site.
- Removal and disposal: All drums and debris located on the former USL property were removed and disposed of off-site.
- Installation of a septic tank system: A new septic tank system was installed for the USL office property.

Following the 1997 ROD Amendment and completion of the new human health and ecological risk assessment, a Consent Decree (CD) for RD and RA was negotiated with the USL PRPs. The CD was entered on September 28, 1998, with the U.S. District Court for Southern District of Ohio. The EPA approved the RD/RA Work Plan on April 23, 1999, and from June through November 1999, the PRPs conducted RA activities under the EPA's oversight.

Nearly 62,000 cubic yards of battery casing debris were excavated, treated, and shipped off-site. Approximately 11,500 cubic yards of soil were excavated and treated. Nearly 3,000 cubic yards of the

excavated soils did not require treatment and were utilized as clean backfill for the Site. Soils not meeting the cleanup standards were retreated and re-sampled until the cleanup standards and RCRA landfill disposal requirements were achieved. See Appendix A, Figures 1 and 2 for a depiction of areas remediated. The remediated areas were graded with clean soil and revegetated with a mixture of seed, as part of the Site drainage control required in the 1988 ROD. Additionally, one metal building was demolished, and the scrap metal was transported to a RCRA Subtitle D landfill.

To assist in determining the required depth of excavation, x-ray fluorescence screening devices were utilized during the RA. Excavation depths were increased until the lead cleanup criterion of 1,550 mg/kg was achieved. Soil samples were collected and verified by laboratory analysis. Because all battery casing chips and contaminated soils exceeding the 1,550 mg/kg cleanup level were removed, a solid waste cover system was not required at the Site.

Seven residential and four groundwater monitoring wells were sampled for lead in accordance with the Phase I Groundwater Monitoring Program Plan included in the Final RA Report USL NPL Site (ENTACT, Inc., 2000). The results of the sampling, available in the Final Phase I Groundwater Sampling Report (ENTACT, Inc., 2000), showed that the updated drinking water standards for lead were not exceeded.

In addition, surface water monitoring and sampling were conducted during the RA in 1999 to monitor for potential releases of lead to the channel as a result of the materials handling at the Site. Storm water runoff control measures were implemented, such as installing a straw/hay bale unit directly up-gradient of the channel which reduced the impacts from the Site to the channel.

Air monitoring activities were performed to monitor particulate matter and lead concentrations throughout the 1999 RA. Ambient Air Quality Standards were not exceeded for lead or particulate matter during the RA.

Following the final inspection of the Site, the EPA determined that the remedy was constructed according to the RD/RA specifications and signed the Superfund Site Preliminary Close Out Report (PCOR) on December 15, 1999 (EPA, 1999). The PRPs submitted the sitewide Final RA Report on February 3, 2000 (ENTACT Inc., 2000).

The EPA completed a Final Closeout Report (FCOR) in April 2021 (EPA, 2021). The FCOR documented the Site completion criteria and final Site inspection conducted by the EPA. Confirmation samples from the Final RA Report USL NPL Site (ENTACT, Inc., 2000) were input into the updated Adult Lead Model and were analyzed to confirm that the lead cleanup at the former USL property continues to be protective to commercial/industrial workers, trespassers, and utility workers. On September 21, 2021, the EPA deleted the Site from the NPL.

Institutional Controls

Status of Access Restrictions and Institutional Controls: A map showing the area in which the institutional controls (ICs) apply is included in Appendix 2, Figure 3.

Table 4: Summary of Planned and/or Implemented ICs

Media, engineered controls, and areas that do not support UU/UE based on current conditions	ICs Needed	ICs Called for in the Decision Documents	Impacted Parcel(s)	IC Objective	Title of IC Instrument Implemented and Date (or planned)
Soil and Groundwater	Yes	Yes	WACO Historical Society #1 Parcel C06-250206	Prohibit residential use of the property and prohibit potable use of the groundwater outside of commercial/ industrial purposes.	Declaration of Environmental Covenant, Recorded at Miami County Recorder's office on August 11, 2015.
Soil and Groundwater	Yes	Yes	Parcel C06-250222	Prohibit residential use of the property and prohibit potable use of the groundwater outside of commercial/ industrial purposes.	Declaration of Environmental Covenant, Recorded at Miami County Recorder's office on August 11, 2015 (attached to Warranty Deed on June 10, 2024).
Soil and Groundwater	Yes	Yes	WACO Historical Society #2 Parcel C06-250224	Prohibit residential use of the property and prohibit potable use of the groundwater outside of commercial/ industrial purposes.	Declaration of Environmental Covenant, Recorded at Miami County Recorder's office on August 11, 2015.

The former USL property is zoned 1-1, industrial district, within the County and was deed-restricted for that use. On August 11, 2015, an EC was recorded in the Miami County Recorder's office which restricts future use of the Site and included the following requirements: restricted to commercial /industrial activities; prohibit the use of groundwater for purposes other than commercial/industrial; and maintain existing six-foot perimeter fence (Hollencamp, 2015). During the RA, soils exceeding the commercial/industrial cleanup standard of 1,550 mg/kg total lead from the former USL property were transported to a Subtitle D landfill. In addition, 3,000 cubic yards of soil containing less than 1,550 mg/kg total lead and were used for backfill material on the former USL property. Based on the extensive excavation of soils, confirmation soil sampling results and the groundwater sampling results, the EPA determined that an IC to prohibit excavation of soils at depth was not needed as no areas of soil exceeded 1,550 mg/kg of total lead.

In 2015, the WACO Historical Society purchased the Site parcels encompassing the former USL property and currently operates a historical aviation museum on the parcel adjacent to the Site to the Site to the north. The museum has plans to extend the runway from its property to the northeastern portion of the Site, which is allowed and described in the Site EC.

On June 10, 2024, the WACO Historical Society sold a portion of the Site to an adjacent private property owner. As part of the sale, the parcel encompassing the former USL property was divided into three parcels, with WACO Historical Society maintaining ownership of parcel C06-250206 and the

newly created parcel C06-250224 (MetroNet leased parcel), and the private property owner acquiring the newly created parcel C06-250222 (See Appendix 2, Figure 3). All properties are subject to the August 2015 EC. The Warranty Deed for parcel C06-250206 to the private owner noted that the parcel is subject to the August 2015 EC and by accepting and recording the deed that the owner agrees to comply with the requirements of the Risk Management Plan, which was attached to the deed.

No soils above cleanup standards remained on the commercial and residential properties adjacent to the former USL parcel and no ICs are necessary on those properties.

Current Compliance: All current Site uses are in accordance with the requirements in the ICs at the Site. No IC compliance issues have been noted or observed during the 2/3/2026 Site inspection attended by the EPA and the WACO Historical Society, nor did any compliance issues come up during interviews and discussions with WACO Historical Society.

Long-Term Stewardship: Long-term stewardship of the IC remedy and access restrictions is necessary to help ensure that the ICs and access restrictions implemented are maintained, monitored and enforced so that the remedy components continue to function as intended. Necessary long-term stewardship procedures include maintenance of the perimeter fence and insurance of compliance with ICs on the three parcels subject to the 2015 EC. The landowners, WACO Historical Society and the private property owner, are responsible for conducting these long-term stewardship procedures. The required long-term stewardship procedures are described in the 2015 EC.

Additionally, EPA approved a Risk Management Plan developed by WACO Historical Society in 2021 that elaborates on the long-term stewardship procedures outlined in the EC. The Risk Management Plan also provides a framework for soil management procedures to ensure any excavated soils are properly managed and outlines notifications procedures for any redevelopment work.

IC Follow-up Actions Needed: Layering of ICs is recommended for parcels Parcel C06-250224 and C06-250206 maintained by WACO Historical Society. In addition to the 2015 EC, an informational device, such as a deed notice referencing the Risk Management Plan that elaborated on the long-term stewardship procedures in the 2015 EC.

Systems Operations/Operation & Maintenance

Operation and Maintenance (O&M) is conducted by WACO Historical Society and Wells Electric, the current landowners. Routine O&M at the Site is limited to repairs of the six-foot perimeter fence, replacement of any damaged warning signs on the fence, vegetation management, and maintaining and monitoring of implemented ICs. Since the last FYR, repairs have been made to the perimeter fence and warning signs have been reattached to the perimeter fence. O&M activities for groundwater monitoring were discontinued in 2000 after sampling from nearby residential wells and monitoring wells on the USL property were below the GW cleanup goal in the 1997 ROD Amendment and FPDWS.

III. PROGRESS SINCE THE LAST REVIEW

This section includes the protectiveness determinations and statements from the last FYR as well as

the recommendations from the last FYR and the current status of those recommendations.

Table 5: Protectiveness Determinations/Statements from the 2021 FYR

OU #	Protectiveness Determination	Protectiveness Statement
OU1 and Sitewide	Protective	The remedy at the Site is protective of human health and the environment because impacted soils have been removed, the levels of lead and arsenic in groundwater are below FPDWS, and ICs in the form of an EC have been implemented. The Site, previously abandoned, has been sold to a responsible owner. Site access is restricted by fencing and gates. The ICs and the sale of the Site will help ensure long-term stewardship.

There were no issues or recommendations identified in the 2021 FYR that would affect current or future protectiveness of the remedy.

OTHER FINDINGS

The following other findings were identified in the 2021 FYR that may improve management of O&M, but do not affect remedy protectiveness. Status updates are included below each finding:

- *The landowner should continue to repair the perimeter fence and reattach no trespassing warning signs, as needed.*

  Update: Substantial repairs have been made to fix the damage that occurred due to flooding of the ditch. Regular Site inspections have found the fence to be in good condition.

- *The EC should be amended to reference the Risk Management Plan for long-term stewardship procedures.*

  Update: The warranty deed for the Wells parcel included reference to both the EC and the Risk Management Plan. Layering of ICs on the WACO Historical Society owned parcels to include an informational device, such as a deed notice, that references the Risk Management Plan is recommended.

- *As all RAOs have been met and effective ICs are in place, it is recommended that the Site be deleted from the NPL.*

  Update: The Site was deleted from the NPL on September 21, 2021.

IV. FIVE-YEAR REVIEW PROCESS

<u>Community Notification, Involvement & Site Interviews</u>

A public notice was made available by posting on EPA's public notice website on December 11, 2025, and updating the EPA website for the Site (See Appendix 3 for Public Notice), stating that there was a FYR and inviting the public to submit any comments to EPA. Site interviews were conducted with the landowner by email and during the Site inspection. During the Site interviews, clarification was requested on the fencing requirements as landownership has changed on one parcel. It was clarified that the fences should be maintained by the owner of the parcel as the fence was acquired as part of

the property sale. No public comments were received. The results of the review and the report will be made available on the Site website https://www.epa.gov/superfund/united-scrap-lead.

Data Review

There was no groundwater data to review during this FYR period as groundwater monitoring ceased in 2000 when it was shown that there have been no exceedances of the FPDWS standards for lead and the 1997 ROD Amendment cleanup goal. The groundwater monitoring wells were abandoned shortly thereafter.

Site Inspection

The inspection of the Site was conducted on February 3, 2026, by Katherine Thomas, EPA RPM. In attendance were Jim McGarry and Ken Ott, Trustees from the WACO Historical Society. The purpose of the inspection was to assess the protectiveness of the remedy. The perimeter fence and access gates are generally in good condition. Site use is restricted by the fencing and gates. No signs of vandalism or trespassing were observed. No uses of the Site incompatible with the 2015 EC were observed. The area subject to RA activities is heavily vegetated with the gravel cover visible. Significant efforts have been taken to remove vegetation in the northern half of the parcel (outside of the eight-acre area subject to RA) and grade the Site in a manner that would support the future extension of the runway, as permitted in the EC. The repairs to the fencing damaged during a canal flooding event were completed along the southern border of the Site. The FYR Site Inspection Checklist can be found in Appendix 4.

V. TECHNICAL ASSESSMENT

QUESTION A: Is the remedy functioning as intended by the decision documents?

Yes.

Question A Summary:

Remedial Action Performance

The review of Site documents and the results of the Site inspection indicate that the remedy is functioning as intended by the ROD and ROD Amendment. The selected cleanup levels from the ROD and ROD Amendment have been achieved by implementation of the response actions at the Site. Contaminated soils above 210 mg/kg were removed from adjacent commercial and residential properties to the former USL property. Confirmation sampling was conducted to ensure that the cleanup level was met on the adjacent commercial and residential properties. On the former USL property, nearly 62,000 cubic yards of battery casing debris were excavated, treated, and shipped off-site. Approximately 11,500 cubic yards of soil were excavated and treated. Soils not meeting the cleanup standards of 1,550 mg/kg were retreated and re-sampled until the cleanup standards and RCRA landfill disposal requirements were achieved. O&M is limited to repairs of the six-foot perimeter fence, replacement of any damaged warning signs on the fence, vegetation management, and maintaining and monitoring of implemented ICs.

The Site was deleted from the NPL on September 21, 2021.

Implementation of Institutional Controls and Other Measures

Access restrictions, such as perimeter fencing and gates, and ICs are in place at the Site. The 2015 EC restricts future use of the Site to commercial/industrial activities, prohibits the use of groundwater for purposes other than commercial/industrial, and requires maintaining the existing six-foot perimeter fence. There have been no compliance issues of the ICs based on the annual reports and annual Site inspections, and the perimeter-area fencing and access gates are generally in good condition. A Risk Management Plan was developed by WACO Historical Society in 2021 and approved by EPA to document long-term stewardship procedures outlined in the EC. The Risk Management Plan also provides a framework for soil management procedures to ensure any excavated soils are properly managed and outlines notification procedures for any redevelopment work at the Site. As noted above, layering of ICs is recommended for parcels Parcel C06-250224 and C06-250206 maintained by WACO Historical Society by adding an informational device, such as a deed notice, referencing the Risk Management Plan to the deed to elaborate on the specific procedures for long-term stewardship that are discussed in the 2015 EC.

In 2024, parcel C06-250222 was sold to an adjacent property owner. The Warranty Deed noted that the parcel is subject to the 2015 EC and by accepting and recording the deed the owner agrees to comply with the requirements of the Risk Management Plan, which was attached to the deed. No compliance issues of the ICs have been noted since the sale of the parcel.

QUESTION B: Are the exposure assumptions, toxicity data, cleanup levels, and remedial action objectives (RAOs) used at the time of the remedy selection still valid?

No.

Question B Summary:

The EPA's 2021 Revised Lead and Copper Rule and 2024 Lead and Copper Rule Improvements, dated 12/30/2024, were reviewed for this FYR. The action level for lead in groundwater under the 2024 Lead and Copper Rule is now 10 ppb, reduced from the 1991 Lead and Copper Rule level of 15 ppb. While no new data was submitted, the action level was compared to the lead concentrations in the 2000 Phase 1 Groundwater monitoring report (ENTACT, 2000). The highest lead concentrations from that sampling event, 2.5 ppb at RW-2 and 3.5 ppb at RW-7, are below the new 10 ppb action level. No off-site exceedances above the current action level have been noted since 1979.

On October 16, 2025, the EPA released the "Residential Lead Directive for CERCLA Sites and RCRA Hazardous Waste Cleanup Program Facilities" (2025 Lead Directive). As outlined in the 2025 Lead Directive, EPA's national residential lead policy specifies the use of a regional screening level (RSL) of 200mg/kg for lead in residential soil and a target children's Blood Lead Level of 5 micrograms per deciliter (µg/dL) to develop PRGs. A review of the 1991 Pre-Design Investigation (Svedrup, 1991) showed that residential lead samples prior to cleanup ranged between 21 to 480 mg/kg in the 0 to 12 inch range (See Appendix 2 Figure 4). Following excavation and confirmation sampling, all residential lead samples were below 200 mg/kg with levels generally closer to the background level established at

20mg/kg. As mentioned above, the 210mg/kg residential cleanup level was agreed on as part of the Pre-Design Investigation and was not documented in the ROD. Formal documentation of this cleanup level may benefit the Administrative Record at the Site.

There have been no changes in the physical condition of the Site that would affect the protectiveness of the remedy. All remedial work on the former USL property was completed to meet commercial/industrial standards and ARARs or performance standards cited in the 1988 ROD and 1997 ROD Amendment have been achieved. There have been no major changes in these ARARs, no new exposure assumptions, and no new standards affecting the protectiveness of the remedy.

QUESTION C: Has any other information come to light that could call into question the protectiveness of the remedy?

No.

There is no new information that has come to light which could call into question the protectiveness of the remedy. The Site continues to be subject to occasional flooding during high precipitation events due to its low elevation, and location within the flood plain of the Great Miami River. The potential for flooding was considered in the 1988 ROD and 1997 ROD Amendment and the cleanup was conducted in a manner to prevent the potential for release of contaminants due surface water runoff.

VI. ISSUES/RECOMMENDATIONS

There are no issues or recommendations that affect current or future protectiveness of the remedy.

Issues/Recommendations
OU(s) without Issues/Recommendations Identified in the Five-Year Review:
OU1/Sitewide

OTHER FINDINGS

The following are recommendations that were identified during the FYR but do not affect current or future protectiveness:

- Layering of ICs is recommended for parcels Parcel C06-250224 and C06-250206, that are maintained by WACO Historical Society. In addition to the 2015 Environmental Covenant, an informational device, such as a deed notice referencing the Risk Management Plan, could be added so that the long-term stewardship procedures are included for any subsequent purchasers.
- Evaluate the need for a site decision document to formally document the 210mg/kg residential lead soil cleanup number from the 1991 Pre-Design Investigation in the Administrative Record along with a comparison of site values to the 2025 Lead Directive as discussed in this FYR.

VII. PROTECTIVENESS STATEMENT

OU1 and Sitewide Protectiveness Statement
Protectiveness Determination: Protective
Protectiveness Statement: The remedy at the United Scrap Lead Co., Inc. Site is protective of human health and the environment. Impacted soils have been removed, the levels of lead in groundwater are below cleanup standards, and ICs in the form of an EC have been implemented. Site access is restricted by fencing and gates. Long-term stewardship is provided in the 2015 EC and the Risk Management Plan.

VIII. NEXT REVIEW

The next FYR report for the United Scrap Lead Co., Inc. Superfund Site is required five years from the completion date of this review.

Appendix 1 Reference List

Reference List

Weston-Sper TAT (August 1985) *Emergency Action Plan for the United Scrap Lead Site*

Weston-Sper (December 1986) *OSC Report Outline*

Camp Dresser & McKee (February 1988) *Remedial Investigation Report: Volume 1 of 2 (Text, Figures, and Tables)*

Camp Dresser & McKee (February 1988) *Remedial Investigation Report: Volume 2 of 2 (Appendices)*

USDHHS/ USPHS/ ATSDR (March 23, 1988) *Health Assessment for the United Scrap Lead Site*

EPA (September 30, 1988) *Record of Decision United Scrap Lead*

Sverdrup Environmental, Inc. (November 1991) Pre-design Field Investigation Report for the United Scrap Lead Superfund Site Troy, Ohio.

Conestoga-Rovers & Associates (March 1992) *Final Report: Perimeter Site Fencing*

OHM Remediation Service Corp. (August 22, 1995) *Final Report for Phase I Remedial Action*

OHM Remediation Service Corp. (December 8, 1995) *Final Report for Phase I Remedial Action Appendices*

ENTACT, Inc (September 19, 1996) *Risk Assessment for United Scrap Lead Site*

USACE (January, 1997) *Supplement to the Alternatives Analysis Study for the United Scrap Lead Superfund Site*

EPA (June 27, 1997) *U.S. EPA Superfund Record of Decision Amendment United Scrap Lead Superfund Site City of Troy Concord Township, OH*

EPA (June, 1997) *Record of Decision Amendment Summary United Scrap Lead Superfund Site City of Troy Concord Township, OH*

EPA (December 10, 1999). *Superfund Site Preliminary Close Out Report, United Scrap Lead Superfund Site*

ENTACT, Inc. (February 1, 2000) *Final Remedial Action Report United Scrap Lead NPL Site*

ENTACT, Inc. (March 07, 2000) *Final Phase I Groundwater Sampling Report*

ENTACT, Inc. (July 06, 2000) *Final Phase II Groundwater Sampling Report*

EPA (September 27, 2001) *First Five-Year Review Report for United Scrap Lead Co., Inc. Superfund Site Miami County, OH*

EPA (November 27, 2001) *Risk Evaluation for United Scrap Lead Trespasser Scenario*

EPA (September 2, 2006) *Second Five-Year Review Report for United Scrap Lead Co., Inc. Superfund Site Miami County, OH*

EPA (September 8, 2011) *Third Five-Year Review Report for United Scrap Lead Co., Inc. Superfund Site Miami County, OH*

EPA (October 8, 2015) *EPA Letter Re: Site-wide Ready for Anticipated Use (SWRAU)*

Hollencamp (August 11, 2015) *Environmental Covenant Arthur Hollencamp*

US District Court Southern District of Ohio Western Division (July 7, 2015) *Order Signed Case No. C-3-91-309 Re: Sale of United Scrap Lead Site to WACO Historical Society*

EPA (April 14, 2016) *Fourth Five-Year Review Report for United Scrap Lead Co., Inc. Superfund Site Miami County, OH*

EPA (May 17, 2017) *Transmittal of Update to the Adult Lead Methodology's Default Baseline Blood Lead Concentration and Geometric Standard Deviation Parameters*

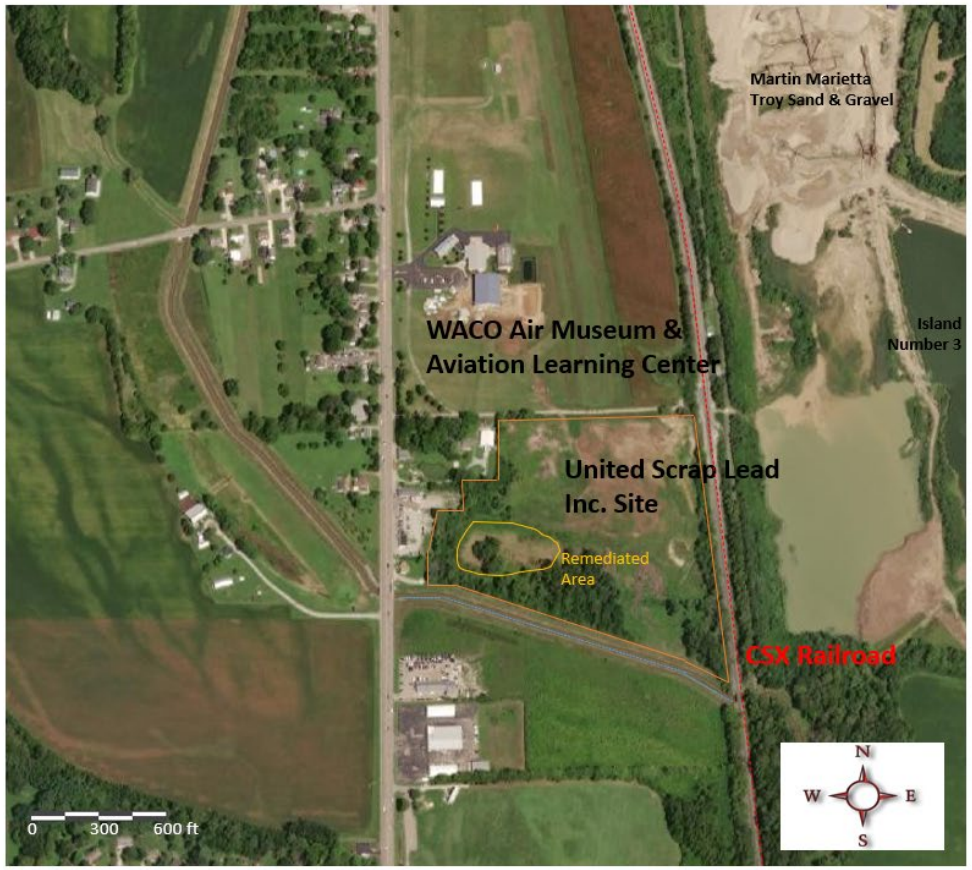
EPA (December 14, 2020) *December 2020 Protectiveness Evaluation of Lead Clean-up Level for the United Scrap Lead Site*

EPA (April 9, 2021) *Fifth Five-Year Review Report for United Scrap Lead Co., Inc. Superfund Site Miami County, OH*

EPA (April 7, 2021) *Final Close Out Report United Scrap Lead Co., Inc. Superfund Site Miami County, OH*

Appendix 2 Site Maps

Figure 1 Site Map



Legend

- Site boundary fenced in; areas subject to 2015 Environmental Covenant
- Remediated Area
- CSX Railroad
- Channel ("Tributary to Island 3" or "McKaig Ditch")

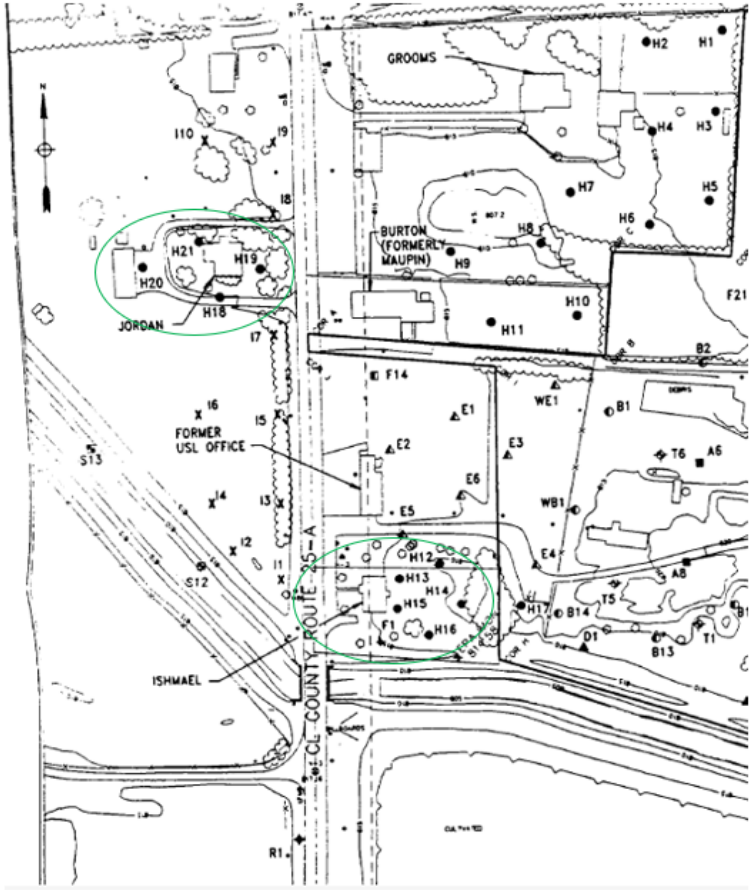
Figure 2 Area of Concern

Legend

Former Area of Concern

Figure 3 Parcel Division as of 6/10/2024

Figure 4 Residential Lead results from the 1991 Pre-Design Investigation



Depth (feet)	Boring									
	H12	H13	H14	H15	H16	H17	H18	H19	H20	H21
0 - 1	79	120	69	480	98	120	110	42	170	34
2 - 3	10	52	10	23	15	550	18	18	24	34
4 - 5	110	16	14	26	27	13	37	23	120	18

Appendix 3 Public Notice

United States Environmental Protection Agency

Public Notice: EPA Conducting Review of United Scrap Lead Co. Inc. Superfund Site

Publish Date: December 11, 2025

Summary

EPA is conducting a five-year review of the United Scrap Lead Co. Inc. site at 1425 S. Dixie Highway in Troy, Ohio. The Superfund law requires regular checkups of sites that have been cleaned up or where cleanup has been ongoing for at least five years – with waste managed on-site – to make sure the cleanup continues to protect people and the environment. This is the sixth five-year review of this site.

EPA's cleanup at the site consisted of the excavation, treatment and off-site disposal of polluted soil; installation of residential wells with ongoing monitoring of groundwater; fencing and institutional controls to limit future use of the site. All cleanup activities and remediation objectives are complete, and the site has been deleted from the Superfund National Priorities List.

More information is available at the United Scrap Lead Co. site webpage <https://epa.gov/superfund/united-scrap-lead>. The review is expected to be completed in April of 2026.

The five-year review is an opportunity for you to tell EPA about site conditions and any concerns you have.

How to Comment

Comments Due: January 31, 2026

Email or call EPA to comment about site conditions and any concerns you have.

Katherine Thomas
(thomas.katherine@epa.gov)
Remedial Project Manager
312-353-5878

Adrian Palomeque
(palomeque.adrian@epa.gov)
Community Involvement Coordinator
440-250-1715

You may also call EPA toll-free at 800-621-8431, 8 a.m. to 4:30 p.m., weekdays.

Last updated on December 11, 2025

UNITED SCRAP LEAD CO., INC.
Website Information

Announcements and Key Topics
U.S. EPA issued a public notice announcing a five-year review of the site to verify the remedy continues to protect people and the environment. The Superfund law requires regular checkups of sites that have been cleaned up or where cleanup has been ongoing for at least five years – with waste managed on-site – to make sure the cleanup continues to protect people and the environment. This is the seventh five-year review of this site.

The five-year review is expected to be completed in April of 2026 and is an opportunity for you to tell EPA about site conditions and any concerns you have. If you would like to share comments, please contact EPA's Remedial Project Manager listed on this website.

** The public notice hyperlink will take the public to a notice being published by the R5 Web team.*

Background

The 25-acre United Scrap Lead Co., Inc. site is in Troy, Ohio. lead from batteries was reclaimed on site from 1948 to 1983. Approximately 32,000 cubic yards of crushed battery cases were generated and used as fill material. The battery acid and the rinse water that was produced from the reclaiming activities was disposed of on site. These facility operations contaminated soil and debris on-site.

Ohio EPA first became concerned about the site conditions in 1979 when the State found levels of cadmium and lead in the groundwater well on-site which exceeded the interim Federal Primary Drinking Water Standards. Ohio EPA required United Scrap Lead, also known as USL, to comply with the State waste disposal regulations and dispose the chipped battery casings off-site. The site was listed on the National Priority List, or NPL, in September 1984.

The soil cleanup of the USL site was completed in 2001 and groundwater monitoring at the site was discontinued in the same year after all monitoring wells were found to meet Federal Primary Drinking Water Standards. In September 2021 the site was deleted from the NPL.

What Is the Current Site Status?

All cleanup activities managed through federal and PRP actions have been completed at the site, and the site is considered protective of human health in the long-term.

In September 2021 the site was deleted from the National Priorities List after determining that the required cleanup was complete and no further action was necessary other than continued operation and maintenance, monitoring, and five-year reviews.

EPA has conducted several five-year reviews of the site's remedy. These reviews ensure that the remedies put in place protect public health and the environment, and function as intended by site decision documents. EPA is conducting the sixth five-year review of the site and is expected to be completed in April of 2026. The review is an opportunity for you to tell EPA about site conditions and any concerns you have. If you would like to share comments, please contact EPA's Remedial Project Manager listed on this website.

Appendix 4 Site Inspection Checklist