



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
5 POST OFFICE SQUARE – SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

CONTAINS ENFORCEMENT-SENSITIVE INFORMATION

MEMORANDUM

DATE: 11 August 2016

SUBJ: Request for a Removal Action at the Attleboro Dyeing and Finishing (Former)/ Seekonk Fire Site, Seekonk, Bristol County, Massachusetts - **Action Memorandum**

FROM: Natalie McClaine, On-Scene Coordinator
Emergency Response and Removal Section I

THRU: Edward J. Bazen, Chief *(EJB)*
Emergency Response and Removal Section I

Carol Tucker, Chief
Emergency Planning & Response Branch

TO: Bryan Olson, Director *BO*
Office of Site Remediation and Restoration

I. PURPOSE

The purpose of this Action Memorandum is to request and document approval of the proposed removal action at the Attleboro Dyeing and Finishing (Former)/ Seekonk Fire Site (the Site), which is located at 36 Maple Avenue in Seekonk, Bristol County, Massachusetts. Hazardous substances present in drums and containers at the Site, if not addressed by implementing the response actions selected in this Action Memorandum, will continue to pose a threat to human health and the environment. There are no nationally significant or precedent-setting issues associated with this Site, and there has been no use of the OSC's \$200,000 warrant authority.

II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID# : MAD001196633
SITE ID# : 01KD
CATEGORY : Time-Critical

A. Site Description

1. Removal site evaluation

The Site operated as the Attleboro Dyeing and Finishing Corporation (ADF Corp.) from 1945 to 1980. According to previous reports, wastes generated on site by ADF Corp. included dye water, fabric dye fixing agents (copper, chromium, and manganese), waste fabric coatings (styrene-butadiene rubber and acrylic latex), and waste dye carriers (toluene and biphenyl). Numerous environmental investigations have been conducted at the Site under EPA and Massachusetts Contingency Plan (MCP) programs between 1980 and 2013. The EPA 2013 PA/SI investigation identified unlabeled 55-gallon drums and unlabeled 5-gallon containers containing unknown substances as primary Site concerns. All drums and containers will be sampled during the Removal Action as described in this Action Memorandum.

Previous environmental investigations also identified hazardous substances including, but not limited to, semi-volatile organic substances (SVOCs), volatile organic substances (VOCs), and metals in soil, surface water, and sediments near the settling ponds and downstream along the Ten Mile River. These hazardous substances did not exceed the Removal Management Levels (RMLs) as defined by EPA, and will not be addressed in this removal action. To date, no remediation activities have been conducted at the Site.

In a January 2004 Memorandum, the Emergency Planning and Response Branch (EPRB) indicated that based on the results of a Site Reassessment (SR) submitted from Tetra Tech NUS (TtNUS) in 2002, a removal action was not appropriate. The memorandum indicated that the Site was active, access was controlled, and Massachusetts Department of Environmental Protection (Mass DEP) would address the Site under the MCP.

On 17 June 2013, Mass DEP representative Julie Hutcheson and EPA On-Scene Coordinators (OSC) Ted Bzenas and Rich Haworth conducted a site walk. The Site was referred to EPRB for assistance because Mass DEP had experienced difficulty gaining access to the property. During the site walk, a large amount of fire-damaged debris (from a May 2012 fire) potentially containing asbestos-containing material (ACM) was observed. Several deteriorating 55-gallon drums and 5-gallon containers both indoors and outdoors of the remaining mill building were observed and deemed an imminent and substantial threat to human health and the environment.

On 30 July 2013, EPA, Mass DEP, and Superfund Technical Assessment and Response Team (START) mobilized to the Site to conduct a Preliminary Assessment/Site Investigation (PA/SI). The PA/SI included drum inventory, hazardous categorization (HAZCAT), and the collection of perimeter and personal air, surface soil, sediment, surface water, and suspected ACM samples. Analytical results are documented in the *Removal Program Preliminary Assessment/Site Investigation Report for the Seekonk Mill Fire Site* dated 30 July 2013. Due to the relatively

small volume of hazardous materials at the Site, Mass DEP agreed to manage the clean-up under the MCP, therefore, EPA referred the Site back to the State.

In April 2016, Mass DEP referred the Site again to EPRB, primarily because of the difficulty in gaining Site access. On 2 August 2016, EPA OSCs John McKeown and Natalie McClaine, Enforcement Coordinator Tina Hennessy, and Brownfields Environmental Protection Specialist Jim Byrne conducted a site walk with EPA Lead Public Affairs Specialist Doug Gutro, Mass DEP representatives Jaime Goncalves and Dan Crafton, Seekonk Fire Chief Michael Healy, START personnel Bill Mahany, and Seekonk Conservation Agent Jennifer Miller. The objective of the site walk was to confirm the results of the 2013 PA/SI conducted by OSC Ted Bazenas and determine if a removal action was necessary. Based on the site walk observations, the principal hazardous substances that are being released or for which there is a threat of release include, but are not necessarily limited to the table below:

Hazardous Substances	Media
Ignitable, reactive, corrosive chemicals – Primary Site Concerns	• 55-gallon drums* • 5-gallon containers* * rusted, dented, or leaking
Asbestos Containing Material (ACM) – Secondary Site Concerns* *The amount of ACM on site is considered minimal and incidental relative to the drums and containers on site	• Pipe wrap small metal vat • Crushed debris • Thread/rope-like braided rings • Fibrous material mixed with ashy debris • Fibrous material mixed with burned debris • Possible roofing material

2. Physical location

The Site is located at 36 Maple Avenue in Seekonk, Bristol County, Massachusetts. The Site is located at 41° 53' 41" north latitude and 71° 19' 41.8" west longitude, as measured from the approximate center of the Site.

The Site is located in a mixed residential and industrial use area, with the closest residence located within approximately 250 feet. The Site is bordered by the following features and structures:

- North: Ten Mile River

- East: Residences and a pond formed by the damming of the Ten Mile River
- West: Forested area
- South: Residences and the Memorial Baptist Church.

3. Site characteristics

The 7.8 acre Site contains the following three buildings: a 105,000 square foot (ft²) heavily fire-damaged former manufacturing building with a two-story portion remaining intact, a two-story former office building located in the southern portion of the Site, and a partially fire-damaged one-story building in the southeastern portion of the Site. There are three former settling ponds located west and northwest of the former manufacturing building, all of which have evaporated. In 2008, a Release Notification under the MCP was submitted to Mass DEP by Omni Environmental Group on behalf of the property owner, R.O.C. Realty Corporation (R.O.C. Realty), to report a possible Imminent Hazard (IH) condition due to the presence of metals above the RCS-1 and RCS-2 standards. R.O.C. Realty consequently installed a fence around the settling ponds as part of an Interim Remedial Action (IRA).

ADF Corp. operations ceased in 1980. In 1981 R.O.C. Realty acquired the property and subsequently leased it to various commercial/industrial operators until 2009, when the building was condemned after a section of the roof collapsed. In 2012, the mill building caught fire and destroyed a significant portion of the buildings, resulting in large amounts of fire-damaged building debris. The current operational status is inactive, and the incident category is abandoned.

According to the EPRB ArcGIS mapping tool, the populations within a one-fourth mile and a one-mile radius of the Site are 226 and 4,969, respectively. The following features are also within a one-mile radius of the Site: one wastewater treatment facility, one dam, two daycares, six water bodies, and two environmentally sensitive areas.

Based on information in EPA's EJSCREEN environmental justice screening tool, zero out of 12 Environmental Justice Indexes for the area within a one-mile radius of the Site exceed the 80th percentile on a national basis.

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

On 17 June 2013, Mass DEP representative Julie Hutcheson and EPA OSC Ted Bazen conducted a site walk and observed the following potential threats of release into the environment:

- Seven unlabeled 5-gallon containers of unknown substances observed off of the pavement and outside of the fenced area of the fire-damaged building
- Five unlabeled 55-gallon drums of unknown substances observed inside the loading bays facing Maple Street
- Metal beams and piping exposed throughout the building footprint that may contain exposed ACM

In the 2013 PA/SI the drums and containers were categorized using RCRA hazardous classification as displayed in Table 1. Due to their combustibility, three containers contain waste characteristic of hazardous waste under RCRA (40 CFR Section 261.21) because of their ignitability characteristics. All 12 drums and containers will be sampled during the Removal Action to determine if further hazardous wastes are present. The deteriorating state of the 12 abandoned drums and containers discovered on the Site increase the potential of release into the environment. All 12 drums and containers were severely rusted, eight of which were dented, and one of which was leaking at the time of the 2013 PA/SI. During the 2016 site walk, the state of the drums and containers were confirmed to be in the same condition or worse.

The present state of the drums and containers increases the threat of actual and potential exposure to nearby human populations, animals, or the food chain. The Site appears to have significant evidence of recent trespassing such as graffiti, arranged furniture, and consumed beverage containers, based upon 2016 site walk observations. Five of the drums and containers are currently stored indoors, which further escalates the potential of trespassers to come into contact with the hazardous waste or spill the containers. The remaining seven containers are currently stored outdoors, which increases their exposure to weather conditions, and ultimately, increases the potential of release into the environment due to their compromised conditions.

Table 1 – Summary of Drum Descriptions and Sample Hazard Categorization

Drum ID	Size (Gal.)	Contents	Condition	Location	Flammability	Copper Wire Test	PCB Test	FID	PID	CO	LEL
DM-01	55	2/3 full	Rusted	Indoors	Non-Flammable	N/A	-	41	4	88.7	26
DM-02	55	1/3 full	Rusted/Dented	Indoors	Non-Flammable	N/A	-	441	15.8	0	0
DM-03	55	Full	Rusted/Dented	Indoors	Non-Flammable	N/A	-	175	105	0	0
DM-04	55	Full	Rusted/Dented	Indoors	Non-Flammable	N/A	-	3125	1070	0	0
DM-05	55	Full	Rusted/Dented	Indoors	Non-Flammable	No Change	-	6833	1451	0	0
DM-06	5	Full	Rusted/Dented	Indoors	Combustible	Green (Chlorine Compound)	<50 ppm	0	0	0	0
DM-07	5	Full	Rusted/Dented/Leaking	Outdoors	Non-Flammable	No Change	-	0	4.4	0	0
DM-08	5	¼ Full	Rusted	Outdoors	Non-Flammable	No Change	-	0	1.7	0	0
DM-09	5	Full	Rusted	Outdoors	Non-Flammable	No Change	-	0	57.3	0	0
DM-10	5	¼ Full	Rusted	Outdoors	Combustible	No Change	-	0	16.6	0	0
DM-11	5	¾ Full	Rusted/Dented	Outdoors	Combustible	No Change	<50 ppm	0	14.5	0	0
DM-12	5	Empty	Rusted/Dented	Outdoors	N/A	N/A	-	0	6.1	0	0

ACM is present at the Site and is a hazardous substance as defined by Section 101(14) of CERCLA, 42 U.S.C. §9601(14) and 40 C.F.R. § 302.4. As described in Table 2 below, eight accessible and exposed pieces of ACM were observed during both the PA/SI in July 2013 and the site walk in August 2016. Asbestos poses health risks when humans breathe in the fibers present in the air. When inhaled in significant quantities, asbestos fibers can cause asbestosis (a scarring of the lungs, which makes breathing difficult), mesothelioma (a rare cancer of the lining of the chest or abdominal cavity), and lung cancer.

Table 2 – Asbestos – Containing Material (ACM) Summary

Sample ID	Collection Date	Matrix	Sample Description
ACM – 101	7/30/2013	ACM	Pipe wrap, greyish white, fibrous
ACM – 102	7/30/2013	ACM	Crystalline, layered material found within a small metal vat
ACM – 103	7/30/2013	ACM	Crushed debris from burned pile near northern edge of foundation
ACM – 104	7/30/2013	ACM	Crushed debris and fine ashy material, grey, near northern edge of foundation
ACM – 105	7/30/2013	ACM	Thread/rope-like braided rings approximately 2 in. diameter
ACM – 106	7/30/2013	ACM	Debris grey-to-brown, fibrous material mixed in with burned ash debris off southern corner of building
ACM – 107	7/30/2013	ACM	Grey-to-brown fibrous material mixed in with burned debris, near south-central portion of property
ACM – 108	7/30/2013	ACM	Possible roofing material, black with silver fibers

5. NPL status

The Site is not currently on the National Priorities List, and has not received a Hazardous Ranking System rating.

B. Other Actions to Date

1. Previous actions

In December 1980, EPA placed the Site in the Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) under Number (No.) MAD001196633. According To CERCLIS, a Preliminary Assessment (PA) and a Site Inspection (SI) were completed in December 1980 and May 1990, respectively; however, these documents were not found in available file information. Following the completion of the PA, Mass DEP issued Release Tracking Number (RTN) 4-00156 to the Site.

Additional available reports generated as part of previous environmental investigations of the Site include the following:

- January 1999 Underground Storage Tank (UST) Closure Assessment Report – Mass DEP
- December 2008 Immediate Response Action (IRA) Completion Report – Mass DEP

- May 2012 Memorandum describing Emergency Response activities conducted at the Site - EPA
- November 2012 Phase I Environment Site Assessment (ESA) - EPA
- April 2013 Targeted Brownfields Assessment (TBA) - EPA

2. Current actions

Since the Mass DEP referral in April 2016, EPA has conducted a preliminary assessment and site walk. On 28 July 2016, EPA conducted a site review meeting and determined the Site conditions meet the criteria for a Time-Critical Removal Action, as stated in Section 300.415 of the Oil and Hazardous Substances National Contingency Plan (NCP). EPA documented this decision with a Site Investigation Closure Memorandum dated 4 August 2016.

C. State and Local Authorities' Roles

1. State and local actions to date

As discussed earlier in this document, numerous environmental investigations have been conducted at the Site under EPA and MCP programs between 1980 and 2013. After EPRB has completed the Removal Action as described in the Action Memorandum, any additional clean-up activities will be returned to the State and/or Town including, but not limited to, the removal of VOCs, SVOCs, and metals located in soil, surface water in the settling ponds, and sediments in the settling ponds and downstream along the Ten-Mile River.

2. Potential for continued State/local response

The Town of Seekonk intends to support the removal action as necessary. The Town also intends to collaborate with EPA Brownfields program, and after obtaining full ownership of the property, determine if a Brownfields grant can assist with remaining Site clean-up needs.

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

As described below, the conditions at the Attleboro Dyeing and Finishing (Former)/ Seekonk Fire Site meet the general criteria for a removal action, as set forth in 40 C.F.R. §300.415(b)(1), in that "there is a threat to public health or welfare of the United States or the environment..." and in consideration of the factors set forth in 40 C.F.R. §300.415(b)(2) as described below.

Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants; [§300.415(b)(2)(i)];

Containerized hazardous substances: There are unidentified hazardous substances in at least three of the drums/containers that were classified as combustible under RCRA. Additional sampling will be conducted during the time of the Removal Action to determine proper transportation and disposal of the remaining drums and containers. Recent evidence of trespassing increases the potential for humans to come into contact with the hazardous containers and drums, many of which are dented, rusted, or leaking.

Asbestos-Containing Material (ACM): ACM was discovered in eight discrete locations of the Site. This Action Memorandum addresses the ACM that is relatively accessible and exposed to the environment. There may be additional ACM in the fire-damaged building debris, however, this Action Memorandum will only address the exposed and easily accessible ACM. The amount of ACM on site is considered minimal and incidental relative to the drums and containers.

Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release [§300.415(b)(2)(iii)];

The containers and drums on the Site are compromised and pose a threat of release into the environment. A release of the containers or drums may result in human exposure due to trespasser activity, and may potentially result in a fire as several of the containers and drums were identified as combustible.

Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released [§300.415(b)(2)(v)];

Several of the containers were discovered outdoors, which increases the potential of the hazardous substances to release into the environment. Exposure of the containers to weather conditions accelerates the rate of rusting, which may ultimately result in a release to the nearby soils if the containers are not properly removed. Many of the containers found outdoors are severely rusted and will only continue to worsen in these conditions. The identified asbestos wrap is also located outdoors and exposed to the weather conditions.

Threat of fire or explosion [§300.415(b)(2)(vi)];

On 1 May 2012, the abandoned 105,000 square-foot building caught fire and consumed approximately three-fourths of the building. Several small explosions and colorful fire and smoke were observed as the fire burned. The containers remaining on site, both indoors and outdoors, pose a threat of fire or explosion. Several of the containers were categorized as combustible, which increases this potential.

The Site is located in a mixed residential and industrial area, with the Memorial Baptist Church next door and the nearest resident living approximately 250 feet from remaining mill building. The opportunity for a substantial fire/explosion and toxic fumes from the contaminants releasing into the environment is further amplified by recently observed trespasser activity.

The availability of other appropriate Federal or State response mechanisms to respond to the release [§300.415(b)(2)(vii)];

In 2013, Mass DEP referred the Site to EPRB, resulting in the completion of a PA/SI by OSC Ted Bzenas. No Removal Action was conducted and the Site was referred back to Mass DEP. The Site was again referred back to EPRB in 2016 because Mass DEP was unable to gain access to the Site. The drums, containers, and openly exposed ACM have remained in place since June of 2013, and possibly earlier.

IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances or pollutants or contaminants from this Site, if not addressed by implementing the response action selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, welfare, or the environment. In accordance with OSWER Directive 9360.0-34 (August 19, 1993), an endangerment determination is made based on "appropriate Superfund policy or guidance, or on collaboration with a trained risk assessor," which is outlined and discussed in Section III above. "Appropriate sources include, but are not limited to, relevant action level or clean-up standards, Agency for Toxic Substances and Disease Registry documents or personnel, or staff toxicologists."

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed action description

The response actions described in this Action Memorandum directly address the actual or potential release of hazardous substances, which may pose an imminent and substantial endangerment to public health, welfare, or the environment. Specific removal activities will include the following:

- Develop and implement a site-specific Health and Safety Plan (HASP);
- Conduct a site walk with the Emergency and Rapid Response Services (ERRS) cleanup contractor;

- Mobilize appropriate personnel, equipment, and supplies;
- Conduct air monitoring to determine exclusion zone and appropriate levels of respiratory protection;
- Perform public outreach and community activities;
- Provide appropriate level of security based on Site conditions;
- Stabilize, segregate, secure, and over-pack containers of hazardous substances located inside and outside of the facility;
- Coordinate with Mass DEP to dispose of any drums or containers containing unused/uncontaminated oil;
- Conduct hazard categorization (HAZCAT) and disposal sampling of secured containers to set up transportation and disposal (T&D);
- Take required actions to address any spilled material;
- Remove easily accessible ACM debris exposed to the environment and weather and prepare for T&D to an EPA approved disposal facility;
- Coordinate and safely complete T&D of all hazardous substances and pollutants on-site to and EPA approved disposal facility;
- Repair response related damage as necessary; and
- Demobilize personnel and equipment.

2. Community relations

EPA has assigned a Community Relations Coordinator (CIC) to this Site. EPA will continue to coordinate with Mass DEP and the Town of Seekonk. If necessary, EPA will issue press releases and a fact sheet as required.

3. Contribution to remedial performance

The cleanup proposed in this Action Memorandum is designed to mitigate the threats to human health and the environment posed by the Site. The actions taken at the Site would be consistent with and will not impede any future responses.

4. Description of alternative technologies

Alternative technologies will be considered and utilized where applicable.

5. Applicable or relevant and appropriate requirements (ARARs)

Federal ARARs:

40 CFR Part 761.61: TSCA requirements for cleanup and disposal of PCBs.

40 C.F.R. Section 761.79: TSCA Decontamination of Equipment Used.

Resource Conservation and Recovery Act, Subtitle C, 40 CFR Parts 260-262 and 264:
Hazardous Waste Identification and Listing Regulations; Generator and Handler Requirements, Closure and Post-Closure. Massachusetts has been delegated the authority to administer these RCRA standards through its state hazardous waste management regulations.

Clean Air Act, 40 CFR Part 61: standards for controlling dust.

Clean Air Act, National Emission Standards for Hazardous Air Pollutants (NESHAPS: 40 CFR § 61.151): Standards for Inactive waste disposal sites that apply to asbestos mills and manufacturing and fabricating. NESHAPS standards for preventing air releases from inactive asbestos disposal sites, including cover standards, dust suppression, and land use controls.

State ARARs:

Massachusetts Contingency Plan 310 CMR 40.0000: Commonwealth of Massachusetts regulation for the cleanup of oil and hazardous waste Sites.

310 CMR 40.0900 Procedures and Standards for the Characterization of the Risk of Harm to Health, Safety, Public Welfare and the Environment

310 CMR 30.100 Hazardous Waste Rules for Identification and Listing of Hazardous Wastes

310 CMR 30.300 Hazardous Waste Management Rules - Requirements for Generators

310 CMR 30.500 Hazardous Waste Management Rules - General standards for hazardous waste facilities

310 CMR 30.680 Hazardous Waste Rules - Containers

310 CMR 30.690 Hazardous Waste Rules - Management, Storage, and Treatment in Tanks

310 CMR Section 7.15: U Asbestos: Commonwealth of Massachusetts standard for handling, transporting and disposing asbestos.

The OSC will coordinate with State officials to identify additional State ARARs, if any. In accordance with the National Contingency Plan and EPA Guidance Documents, the OSC will determine the applicability and practicability of complying with each ARAR that is identified in a timely manner.

6. Project schedule

This time-critical removal action will begin once the Action Memorandum is approved. EPA estimates the removal action to be complete within six months of its commencement.

B. Estimated Costs

COST CATEGORY		CEILING
<i>REGIONAL REMOVAL ALLOWANCE COSTS:</i>		
ERRS Contractor		\$100,000.00
Interagency Agreement		\$0,000.00
<i>OTHER EXTRAMURAL COSTS NOT FUNDED FROM THE REGIONAL ALLOWANCE:</i>		
START Contractor		\$30,000.00
Extramural Subtotal		\$130,000.00
Extramural Contingency	10%	\$13,000.00
TOTAL, REMOVAL ACTION CEILING		\$143,000.00

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

In absence of the response action described herein, conditions at the Site will continue to remain constant or further deteriorate. Delayed action will allow the public health risk and environmental risks posed by compromised containers/drums and exposed asbestos to continue unabated.

VII. OUTSTANDING POLICY ISSUES

There are no precedent-setting policy issues associated with this Site.

VIII. ENFORCEMENT ... For Internal Distribution Only

See attached Confidential Enforcement Strategy.

The total EPA costs for this removal action that will be eligible for cost recovery are estimated to be \$130,000 (extramural costs) + \$15,000 (EPA intramural costs) = \$145,000 X 1.5191 (regional indirect rate) = **\$220,270¹**.

¹Direct Costs include direct extramural costs \$130,000 and direct intramural costs \$15,000. Indirect costs are calculated by using regional indirect rate in effect at time cost estimate is prepared, and is expressed

IX. RECOMMENDATION

This decision document represents the selected removal action for the Attleboro Dyeing and Finishing (Former)/Seekonk Mill Fire Site in Seekonk, Massachusetts developed in accordance with CERCLA, as amended, and is not inconsistent with the National Contingency Plan. The basis for this decision will be documented in the administrative record to be established for the Site.

Conditions at the Site meet the NCP Section 300.415 (b) (2) criteria for a removal action due to the following:

Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants [§300.415(b)(2)(i)];

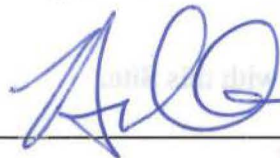
Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release [§300.415(b)(2)(iii)];

Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released [§300.415(b)(2)(v)];

Threat of fire or explosion [§300.415(b)(2)(vi)];

The availability of other appropriate Federal or State response mechanisms to respond to the release [§300.415(b)(2)(vii)];

I recommend that you approve the proposed removal action. The total extramural removal action project ceiling if approved will be \$143,000.

APPROVAL:  DATE: 8/15/16

DISAPPROVAL: _____ DATE: _____

as a percentage of the direct costs $51.91\% \times \$145,000$ consistent with EPA's full cost accounting methodology effective September 30, 2015. 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.