



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

US EPA RECORDS CENTER REGION 5



494717

REPLY TO THE ATTENTION OF:

MEMORANDUM

SUBJECT: ACTION MEMORANDUM - Request for Approval and Funding for a Time-Critical Removal Action at the Unity Ground Water Site, Unity, Wisconsin (Site ID #C53Y)

FROM: Steven J. Faryan, On-Scene Coordinator
Emergency Response Branch 2 - Section 3

THRU: Samuel Borries, Chief
Emergency Response Branch 2

TO: Richard C. Karl, Director
Superfund Division

I. PURPOSE

The purpose of this memorandum is to request and document your approval to expend up to \$1,914,538 to conduct a time-critical removal action at the Unity Ground Water Site (Site) located in Unity, Clark and Marathon counties, Wisconsin. The time-critical removal action is necessary to mitigate threats to public health, welfare, and the environment posed by the presence of chlorinated solvents--tetrachloroethylene (PCE) and its breakdown products trichloroethylene (TCE), cis 1, 2-dichloroethylene (DCE) and vinyl chloride (VC)--in monitoring wells and private drinking water wells above or near the Removal Management Levels for drinking water. The actions proposed herein will mitigate Site conditions by providing an alternative water source or installation of carbon units to the affected residences and installation and sampling of monitoring wells to further define the ground water contamination plume from the source of the ground water contamination at the Unity Auto Mart. The response action will be conducted in accordance with Section 104(a)(1) of CERCLA, 42 U.S.C. § 9604(a)(1).

The Action Memorandum will serve as approval for expenditures by the United States Environmental Protection Agency (EPA), as the lead technical agency, to take actions described herein to abate the imminent and substantial endangerment posed by hazardous substances at the Site. The proposed removal of hazardous substances will be taken pursuant to Section 104(a)(1) of CERCLA, 42 U.S.C. § 9604(a)(1), and Section 300.415 of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 C.F.R. § 300.415.

II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID: WIN000505544

Site ID: C53Y

Category: Time-Critical Removal

The Unity Ground Water Site is located in the Village of Unity and includes the 16 affected private wells that have been sampled and contaminated with chlorinated solvents near or above the Removal Management Levels (RMLs). Sampling has determined the source of the ground water contamination to be the area currently occupied by the Unity Auto Mart located at 102 North Front Street in Unity, Wisconsin. The Village of Unity is split by the county line which runs along Front Street (Highway 13). Part of Unity is in Clark County and part of Unity is in Marathon County (Attachment 1). The Site is the current contaminated ground water plume as defined by contaminated residential wells, and is bordered to the west by East Washington Street, to the north by Taylor Street, to the east by Russell Street, and to the south by East Wells Street (Attachment 1). Commercial properties that have contaminated wells include Unity Post Office, Unity Auto Mart, Reigel's Bar and the Harmony Country Cooperative. The wells at the Unity Auto Mart and Reigel's Bar are also tied into residential properties. The Little Eau Pleine River is approximately 2,700 feet west and 3,100 feet south of the Site, and groundwater is between 5 to 10 feet below ground surface.

A dry-cleaning facility operated at the location of the Unity Auto Mart in the 1970s. A gas station has been operated at the location for decades. The Site is listed on the WDNR Bureau of Remediation and Redevelopment Tracking System (BRRTS) as Environmental Repair (ERP) Site #23-70-00290 (open since 1991), Leaking Underground Storage Tank (LUST) Site #03-37-218804 and Petroleum Cleanup Fund (PECFA) site #54488-999-02 (1999-2011). Contamination was reported in 1991, and a Phase I Site Assessment report was submitted in 1995. Monitoring wells were installed throughout the Site and also to the west, across North Front Street. Primary contaminant constituents include PCE, TCE and VC in soil and groundwater beneath the Site. There is co-contamination with petroleum constituents including benzene, toluene, ethyl benzene, xylenes (BTEX) and methyl tertiary-butyl-ether (MtBE). WDNR conducted soil and groundwater remediation at the Site from the 1990s through early 2000.

In March of 2009 Atrazine and Metolachlor were detected in monitoring wells and residential wells bordering the Harmony Country Cooperative. Four residential wells bordering the Harmony Country Cooperative were abandoned because of the pesticide contamination. The Wisconsin Department of Agriculture is overseeing the sampling and remediation at the Harmony Country Cooperative property.

Vapor intrusion sampling was conducted by the WDNR in May 2014 and results were below WDNR screening levels and the conclusion by WDNR is that there is no threat to residents from vapor intrusion.

In May, July and August 2014 potable water well sampling was conducted by a WDNR contractor. Levels of PCE ranged from non-detect to as high as 410 micrograms per liter ($\mu\text{g/L}$) and TCE as high as 24 $\mu\text{g/L}$. Contaminant levels exceeded state water quality standards in 16 private wells. Seven of the 16 private wells had PCE and TCE concentrations above the EPA RMLs for tap water of 120 $\mu\text{g/L}$ for PCE and 8.5 $\mu\text{g/L}$ for TCE. A shower trailer and bottled water was immediately provided by the WDNR to the affected residents. The Wisconsin Department of Public Health (WDPH) and the Agency for Toxic Substances and Disease Registry (ATSDR) combined the potential health effects of the three highest contaminants found in the private wells--cis-1,2-DCE, PCE and TCE, to recommend that the nine wells with the highest levels of contamination be placed on whole house carbon units. One of the residents chose to hook into a well next door at the tavern. Therefore, eight homes were placed on whole house carbon filters in the Fall 2014. Six additional homes were offered bottled water and one resident refused the offer so five homes are currently on bottled water.

A. Site Description

1. Removal Site Evaluation

From November 3-6, 2014, EPA collected soil and groundwater samples in the vicinity of the Unity Auto Mart in accordance with the Site-specific field sampling plan and the health and safety plan. EPA On-Scene Coordinators (OSCs) and EPA's Superfund Technical Assessment and Response Team (START) contractor completed 11 soil borings using Geoprobe® direct-push technologies, with accompanied soil samples and temporary groundwater monitoring wells installed at each boring. Soil samples were screened at 2-foot intervals with the photoionization detector (PID). One soil sample was collected from each soil boring and samples were collected, in order of priority, from zones with elevated PID readings; zones exhibiting visual evidence of contamination; soil immediately above the shallow groundwater table; and from the lower most interval of the borehole. PID screening results ranged from 0 to 40.5 parts per million (ppm) (calibrated to isobutylene) with Soil Boring SB- 01 having the highest result during the PID screening. A total of 12 soil samples (one at each location with one duplicate sample) were collected and submitted for laboratory analysis.

The highest concentrations of volatile organic compounds (VOC) in soil samples collected at the Unity Auto Mart was SS-1, collected from the eastern side of the property. All other soil sample results were non-detects. No soil samples collected on Site exceeded the EPA RMLs for soil. Analytical results from the sample taken at boring SS-1 found PCE at 6700 parts per billion (ppb), TCE at 1100 ppb, and cis-1, 2-DCE at 1200 ppb. However, EPA was unable to sample underneath the operating building which is expected to have the highest soil concentrations.

Twenty-one groundwater samples, including one duplicate sample, were collected from eleven temporary monitoring wells, three piezometers and six existing monitoring wells. Of the twenty-one samples collected, only the groundwater samples from the Unity Auto Mart exceeded EPA RMLs. Seven groundwater samples collected from the Unity Auto Mart exceeded values for VOCs in drinking water when compared to the EPA RMLs for tap water:

TABLE 1. EPA GROUNDWATER RML EXCEEDANCES

Analyte	EPA RML	TW-01	TW-02	PZ-01	PZ-01-D	MW-01	MW-05	MW-06
1,2 DCA	17	--	--	--	--	--	--	140
Benzene	45	--	--	--	--	--	52	1,400
Cis 1,2-DCE	110	5,600	320	790	810	210	--	490
TCE	8.5	1,900	33	230	230	64	68	71
PCE	120	530	--	4,000	3,900	1,300	--	200
VC	1.9	33	2	4	4.1	--	--	12

Notes: All sample results in µg/L

Constituents detected are consistent with previous investigations at the Unity Auto Mart indicating the significant presence of PCE and the breakdown products TCE, VC, and cis-1,2-DCE. These are the same compounds detected in private wells in the Village of Unity indicating the Unity Auto Mart is the source of the groundwater contamination.

As part of the November 2014 sampling event, EPA collected four samples (TW 8, 9, 10 and 11) at another potential source area to the south of the Unity Auto Mart on the Village of Unity right-of-way. The analytical results from these four soil samples were below detection limits indicating this area was not a source of groundwater contamination in the area.

2. Physical Location

The Site is located in Unity, Wisconsin and includes all of the wells contaminated with chlorinated solvents in the Village of Unity which is in Clark and Marathon Counties, Wisconsin. The Site is bordered to the west by East Washington Street, to the north by Taylor Street, to the east by Russell Street, and to the south by East Wells Street (Attachment 1).

The source of the groundwater contamination is the Unity Auto Mart found at 102 North Front Street in Unity, Wisconsin. Geographic coordinates of the approximate center of the Site are 44°51'05.07" north latitude and 90°19'00.22" west longitude.

An Environmental Justice (EJ) analysis for the Unity Groundwater Site was conducted (Attachment 2 - EJ Screen Report). Screening of the surrounding area used Region 5's EJ Screen Tool which applies the interim version of the national EJ Strategic Enforcement Assessment Tool (EJSEAT). Region 5 has reviewed environmental and demographic data for the area surrounding the Site and determined there is a low potential for EJ concerns at this location.

3. Site Characteristics

The Site consists of a groundwater plume with contaminated residential private wells in a mixed residential and commercial neighborhood in the Village of Unity, Wisconsin.

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

A release of hazardous substances is present at the Site due to the presence of chlorinated solvents including PCE, TCE, 1, 2 cis DCE and VC in the soil and the drinking water. The hazardous substances have migrated from the suspected source and have contaminated the drinking water aquifer that is used by the residents of Unity for their private drinking water source.

5. NPL status

The Unity Ground Water Site is not on the National Priorities List.

6. Maps, pictures and other graphic representations

A map of Unity can be found in Attachment 1.

B. Other Actions to Date

WDNR conducted soil and groundwater remediation at the Site from the 1990s through early 2000. In 2014, WDNR actions included utilizing State Remediation Funds to provide bottled water, installation of carbon units in eight residences, and the installation of a temporary shower trailer for affected residents. Prior to these actions, WDNR conducted vapor intrusion sampling in May 2014. Levels detected were below residential screening levels.

C. State and Local Authorities' Role

1. State and local actions to date (WDNR Actions)

There is PCE and petroleum contamination at the Unity Auto Mart property. The chlorinated solvent contamination was discovered in 1991 and the petroleum contamination in 1999. The remediation of petroleum contamination from USTs was closed in 2011. The chlorinated solvent contamination was not addressed. Vapor intrusion sampling was conducted in May 2014.

In May, July and August 2014 potable water well sampling results indicated contaminant levels exceeded water quality standards. WDNR placed all the affected wells (16) on bottled water and designed carbon units for the nine wells with chlorinated solvent concentrations above dermal and indoor air standards. A portable shower trailer was set behind the village

meeting hall and was operational into November 2014. The carbon units were installed in nine homes and businesses with the highest chlorinated solvent concentrations. The units were sampled to ensure levels were below state drinking water standards. There are six homes that were provided bottled water. One home refused bottle water after the first couple of months so five homes remain on bottled water.

2. Potential for continued State/local response

WDNR has spent a significant portion of the State remediation fund on this project installing and maintaining carbon units, sampling private wells, and providing bottled water. WDNR has requested EPA assistance in an e-mail from Jason Lowery on August 28, 2014 to provide water for the affected residents and to identify and control the source of the ground water contamination.

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

The conditions at the Unity Ground Water Site present an imminent and substantial endangerment to public health, welfare, and the environment and meet the criteria for a time-critical removal action provided for in Section 300.415(b)(2) of the NCP, as amended. These criteria include, but are not limited to, the following:

- **Actual or potential exposure of nearby human populations, animals, or the food chain to hazardous substances, pollutants, or contaminants**

Residential well samples collected by WDNR in 2014 found that levels of PCE ranged from non-detect to as high as 410 micrograms per liter ($\mu\text{g/L}$) and TCE as high as 24 $\mu\text{g/L}$ in commercial and residential wells. Contaminant levels exceeded state water quality standards in 16 private wells. Seven of the 16 private wells had PCE and TCE concentrations above the EPA RMLs for tap water of 120 $\mu\text{g/L}$ for PCE and 8.5 $\mu\text{g/L}$ for TCE. Residents using the contaminated wells, including children, are exposed to hazardous substances by drinking well water and using the well water for cooking and bathing. Below is a summary from the Agency for Toxic Substances and Disease Registry toxicological profiles of probable health effects for human exposure to PCE and TCE.

PCE: High concentrations of PCE can cause dizziness, headache, sleepiness, confusion, nausea, difficulty in speaking and walking, unconsciousness, and death. Irritation may result from repeated or extended skin contact with it. These symptoms occur almost entirely in work (or hobby) environments when people have been accidentally exposed to high concentrations or have intentionally used PCE to get a "high." The U.S. Department of Health and Human Services (DHHS) has determined that PCE may reasonably be anticipated to be a carcinogen. PCE has been shown to cause liver tumors in mice and kidney tumors in male rats (AR #4).

TCE: Breathing small amounts of TCE may cause headaches, lung irritation, dizziness, poor coordination, and difficulty concentrating. Breathing large amounts of TCE may cause impaired heart function, unconsciousness, and death. Breathing it for long periods may cause nerve, kidney, and liver damage. Drinking large amounts of TCE may cause nausea, liver damage, unconsciousness, impaired heart function, or death. Drinking small amounts of TCE for long periods may cause liver and kidney damage, impaired immune system function, and impaired fetal development in pregnant women, although the extent of some of these effects is not yet clear. Skin contact with TCE for short periods may cause skin rashes. Some studies of people exposed over long periods to high levels of TCE in drinking water or in workplace air have found evidence of an increased risk of cancer (AR #7).

- **Actual or potential contamination of drinking water supplies or sensitive ecosystems**

As mentioned above, samples from Site residential wells contained PCE and TCE at concentrations exceeding the EPA MCLs and RMLs for these VOCs. Sixteen private drinking water wells have been confirmed to be contaminated with chlorinated solvents including PCE, TCE, 1, 2 cis DCE, and VC. The WDPH and ATSDR combined the potential health effects of the chlorinated solvents and requested immediate installation of whole house carbon filters to reduce the risk of ingestion, inhalation and dermal absorption of the chlorinated solvents. Seven of the sixteen affected private wells exceed RMLs for drinking water and the other eight wells are within the groundwater plume and have the potential to have groundwater contaminant levels above RMLs. Therefore, actual contamination of drinking water supplies exists. Most of the residences and commercial businesses within the study area use private wells as a drinking water source. In addition, soil and ground water samples at the suspected source area, Unity Auto Mart, exceed RMLs for drinking water and soil for PCE, TCE, 1, 2, cis DCE and VC increasing the likelihood that the current wells will remain contaminated and additional wells could potentially become impacted.

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

Given the exigencies of the situation, no other local or state response mechanism is available to respond in a timely manner to provide an alternate source of drinking water to residents with contaminated wells. WDNR has spent a large portion of the State remediation fund on the Unity Ground Water Site and does not have the resources to continue with their response actions. WDNR has requested EPA assistance to provide potable water to the residents. The Village of Unity is a small incorporated community with a budget under \$100,000 per year and does not have the capital to even operate a municipal water supply to provide potable water to the residents. There are no public or private water utilities to provide alternate water or sewer service.

The actions proposed herein do not address clean-up of potential sources of contamination. EPA is considering the use of CERCLA and other federal or state response mechanisms to further identify and remediate sources of the groundwater contamination.

IV. ENDANGERMENT DETERMINATION

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

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Action Description

The response actions described in this memorandum directly address actual or potential releases of hazardous substances from the Site which pose an imminent and substantial endangerment to public health, or welfare, or the environment. Removal activities will include:

- 1) As needed, provide bottled water to residents with contaminated wells until an alternative water source is implemented;
- 2) Install, develop and sample deep and shallow nested monitoring wells to define the ground water contamination plume limits, geology and potentiometric surface to determine ground water flow.
- 3) Evaluate options for implementing an alternative water supply, including:
 - a. Option 1 is to install shared or community well(s) to supply water to affected residences. This option will require the following actions:
 - i. Complete full scale design, installation and testing of the new shared or community wells for residents with VOC contamination. The location of the shared and community wells will require access or easement to the properties to the East and West of Hwy 13 (Figure 1). The residents and the Village will have a number of issues to decide such as who will own the water supply system, the fee amount, and who will operate and maintain the water supply system.
 - ii. Install test wells and pump test to determine water production rates for potential replacement water wells.
 - iii. Construct well houses, pressure tanks, water main, and meters and tie plumbing to the affected residences.
 - iv. Restore yards and roads after the installation of the main and residential

- connections. Dispose of drilling mud, sand and drilling concrete.
- v. Sample to determine that the wells are potable and that they meet drinking water standards.
 - vi. Remove the carbon filters from the homes once the wells are determined to be potable and dispose of the spent carbon.
 - vii. Close out residential wells in accordance with WDNR regulations.
- b. Option 2 is to install additional carbon units and maintain existing units at each home with a contaminated well. This option will require the following actions:
- i. Utilize existing WDNR design and install carbon units on homes whose well is contaminated with chlorinated solvents that currently do not have carbon units (currently six homes of which five are on bottled water).
 - ii. Sample water to determine efficiency of carbon units.
 - iii. Change out carbon on existing nine private wells and dispose of carbon.
 - iv. Sample water after change out to determine carbon efficiency.
 - v. Maintain carbon units for one year and provide change out of units.
- 4) Provide an alternative water supply or whole house treatment units to residences with contaminated wells using one of the two options, or a combination of options, evaluated above.
- 5) Take any other response actions to address any release or threatened release of a hazardous substance, pollutant or contaminant that the EPA OSC determines may pose an imminent and substantial endangerment to public health or the environment.

For Option 1 to be implemented, the residents and the Village will have a number of issues to decide such as who will own the water supply system, the fee amount, and who will operate and maintain the water supply system. Due to the uncertainty that these issues can be resolved and the potential that the Village or residences could not maintain the water supply system in Option 1, an alternative option is also being evaluated. Option 2 is not preferred but could be the only viable option.

The removal action will be conducted in a manner not inconsistent with the NCP. The OSC has initiated planning for provision of post-removal Site control consistent with the provisions of Section 300.415(l) of the NCP. The removal actions proposed will not impede future responses based upon available information.

Off-Site Rule

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

1. Contribution to remedial performance:

The proposed action will not impede future actions based on available information.

2. Engineering Evaluation/Cost Analysis (EE/CA):

Not applicable for Time-Critical Removal Actions

3. Applicable or relevant and appropriate requirements (ARARs):

All applicable, relevant, and appropriate requirements (ARARs) will be complied with to the extent practicable. An email request was sent to WDNR on July 9, 2015 requesting that WDNR identify state ARARs.

4. Project Schedule:

The removal activities are expected to take 12 weeks to complete. Tasks will not be continuous and will involve monitoring, sampling and carbon change out for a period not to exceed one year. The residents will be responsible for carbon change out after the one year time frame.

B. Estimated Costs

The detailed cleanup contractor cost is presented for two different alternatives to provide water to the affected residents of Unity. Attachment 4 compares Option 1 which is an alternate water supply requiring the installation of a shared well that would be operated and maintained by a homeowners association. Option 2 is the installation of carbon filtration systems and maintenance and sampling for a period of one year. The Independent Government Cost Estimate is presented in Attachment 5 for the shared well alternative and Attachment 6 for the carbon filtration systems. Estimated project costs are summarized below:

REMOVAL ACTION PROJECT CEILING ESTIMATE

Extramural Costs for Option 1: Shared Well Installation and Connection

Regional Removal Allowance Costs

Total Cleanup Contractor Costs.....\$ 1,530,448
(This cost category includes estimates for ERRS,
Subcontractors, labor, materials and equipment)

Other Extramural Cost Not Funded from the Regional Allowance:

Total START, including multiplier costs..... \$65,000
Subtotal, Extramural Subtotal.....\$1,595,448
Extramural Costs Contingency 20%\$ 319,090
**TOTAL, REMOVAL ACTION
PROJECT CEILING.....\$1,914,538**

REMOVAL ACTION PROJECT CEILING ESTIMATE

**Extramural Costs for Option 2: Carbon Filtration Installation and One Year
Maintenance**

Regional Removal Allowance Costs

Total Cleanup Contractor Costs.....\$563,460
(This cost category includes estimates for ERRS,
subcontractors, materials and equipment and a 20 % contingency.)

Other Extramural Cost Not Funded from the Regional Allowance:

Total START, including multiplier costs.....\$ 65,000
Subtotal, Extramural Subtotal.....\$628,460
Extramural Costs Contingency\$125,692
(20% of Subtotal, Extramural Costs)

**TOTAL, REMOVAL ACTION
PROJECT CEILING.....\$754,152**

The response actions described in this memorandum directly address actual or threatened releases of hazardous substances, pollutants, or contaminants at the Site which may pose an imminent and substantial endangerment to public health and safety and the environment. These response actions do not impose a burden on the affected property disproportionate to the extent which that property contributes to the conditions being addressed.

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

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

VII. OUTSTANDING POLICY ISSUES

None

VIII. ENFORCEMENT

For administrative purposes, information concerning the enforcement strategy for this Site is contained in the Enforcement Confidential Addendum.

The total EPA costs for this removal action based on full-cost accounting practices that will be eligible for cost recovery are estimated to be \$3,140,405¹.

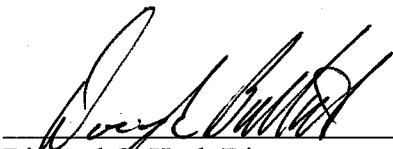
$$(\$1,914,538 + \$79,750 + (57.47\% \times \$1,994,288)) = \$3,140,405$$

¹Direct Costs include direct extramural costs and direct intramural costs. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of site-specific direct costs, consistent with the full cost accounting methodology effective October 2, 2000. These estimates do not include pre-judgment interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual total costs from this estimate will affect the United States' right to cost recovery.

IX. RECOMMENDATION

This decision document represents the selected removal action for the Unity Ground Water Site in Clark and Marathon Counties, Wisconsin. The proposed actions will provide clean potable water to the residents and provide the installation and sampling of monitoring wells to determine the extent of the ground water contamination plume. These decisions were developed in accordance with CERCLA, as amended, and not inconsistent with the NCP. This decision is based on the administrative record for the Site (see Attachment 3).

Conditions at the Site meet the NCP Section 300.415(b)(2) criteria for a removal and I recommend your approval of the removal action proposed in this Action Memorandum. The total removal action project ceiling if approved will be \$1,914,538. Of this, an estimated \$1,848,538 may be used for clean-up contractor costs. You may indicate your decision by signing below.

APPROVE:  DATE: 9/24/15
for Richard C. Karl, Director
Superfund Division

DISAPPROVE: _____ DATE: _____
Richard C. Karl, Director
Superfund Division

Enforcement Addendum

Attachments:

1. Site Layout Map
2. EJSCREEN Report
3. Administrative Record Index
4. Detailed Cleanup Contractor Cost Estimate
5. Independent Government Cost Estimate (Shared Well Option)
6. Independent Government Cost Estimate (Carbon Filtration Option)

cc: B. Schlieger, EPA HQ
L. Nelson, U.S. DOI, **w/o Enf. Addendum**, (email: Lindy_Nelson@ios.doi.gov)
Jason B. Lowery, WDNR, **w/o Enf. Addendum**
(email: jason.lowery@wisconsin.gov)

BCC PAGE HAS BEEN REDACTED

**NOT RELEVANT TO SELECTION
OF REMOVAL ACTION**

ENFORCEMENT ADDENDUM

HAS BEEN REDACTED – TWO PAGES

ENFORCEMENT CONFIDENTIAL

NOT SUBJECT TO DISCOVERY

FOIA EXEMPT

NOT RELEVANT TO SELECTION

OF REMOVAL ACTION

ATTACHMENT 1
Site Layout Map



LEGEND

NOISE EQUIV. LEVEL

NOISE EQUIV. LEVEL < 65 dBA (var.)

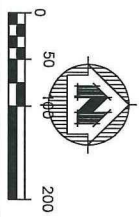
NOISE EQUIV. LEVEL > 65 dBA (var.)

NOISE EQUIV. LEVEL > 70 dBA (var.)

SITE LAYOUT MAP

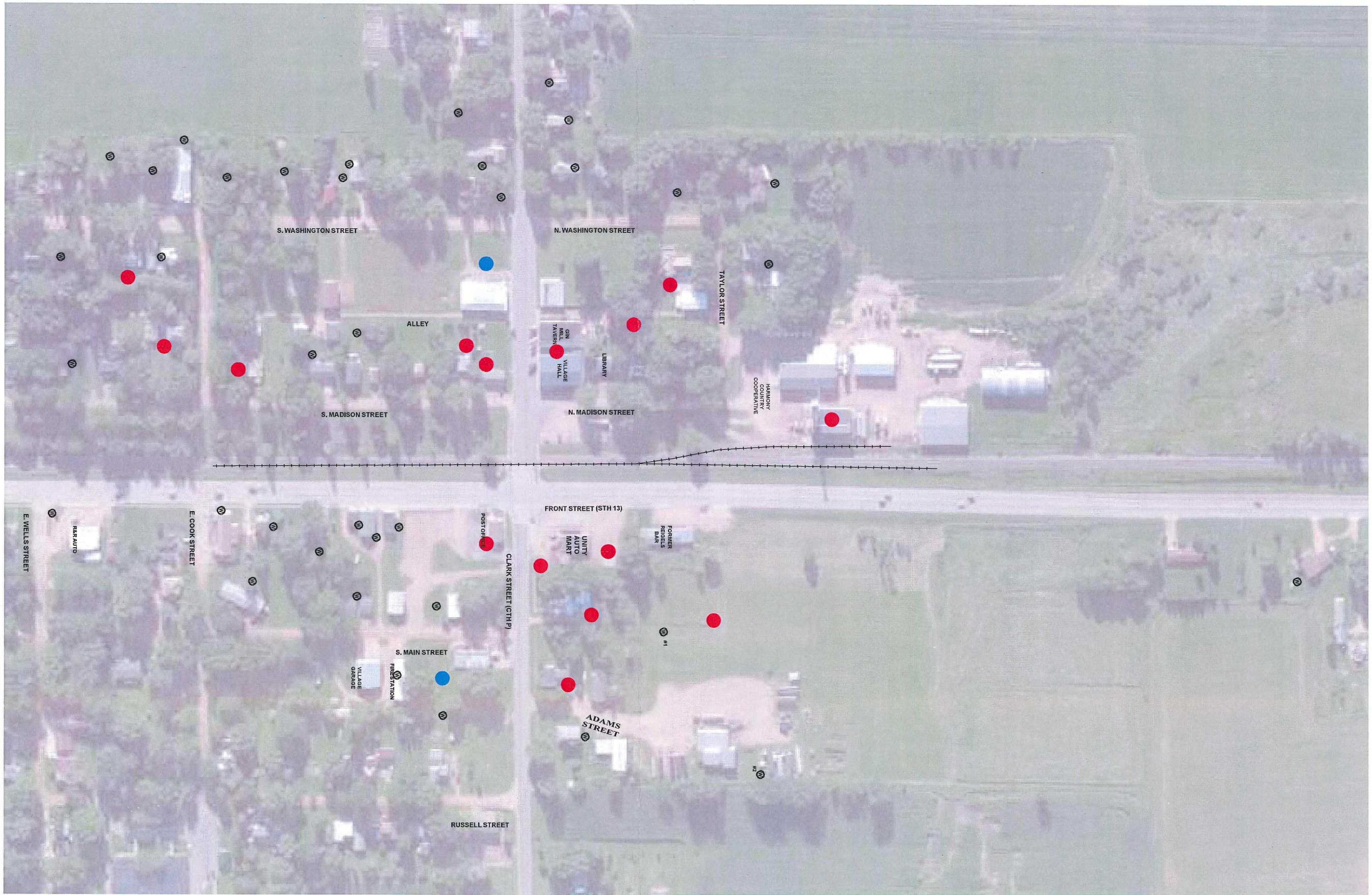
UNITY AUTO MART

102 N. FRONT ST., UNITY, WI



FILE NO.
8267034

SHEET



ATTACHMENT 2
EJSCREEN Report

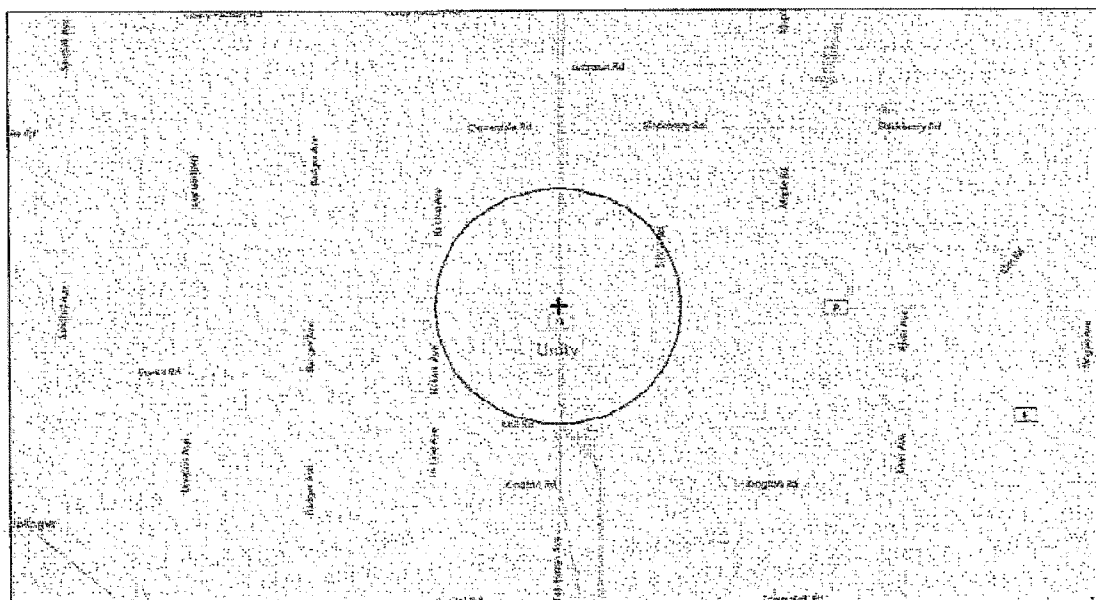
EJSCREEN Report



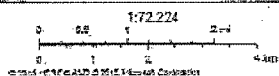
for 1 mile Ring Centered at 44.851629,-90.316517, WISCONSIN, EPA Region 5

Approximate Population: 391

Unity Ground Water Site



June 11, 2015
+ Digitized Point
○ Buffer Area





EJSCREEN Report

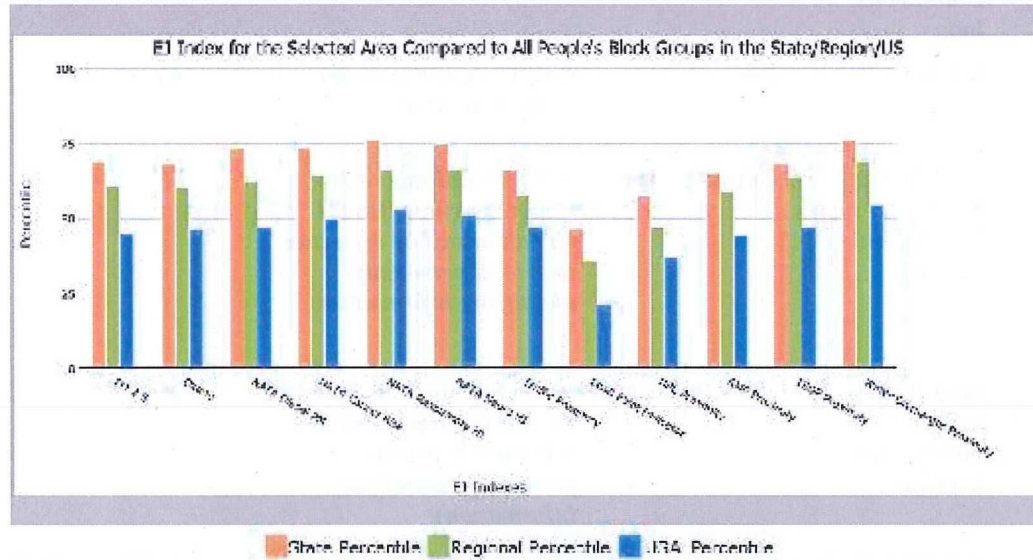


for 1 mile Ring Centered at 44.851629,-90.316517, WISCONSIN, EPA Region 5

Approximate Population: 391

Unity Ground Water Site

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
EJ Indexes			
EJ Index for PM2.5	69	61	45
EJ Index for Ozone	68	60	46
EJ Index for NATA Diesel PM	73	62	47
EJ Index for NATA Air Toxics Cancer Risk	73	64	50
EJ Index for NATA Respiratory Hazard Index	76	66	53
EJ Index for NATA Neurological Hazard Index	75	66	51
EJ Index for Traffic Proximity and Volume	66	58	47
EJ Index for Lead Paint Indicator	46	36	21
EJ Index for Proximity to NPL sites	58	47	37
EJ Index for Proximity to RMP sites	65	59	44
EJ Index for Proximity to TSDFs	68	63	47
EJ Index for Proximity to Major Direct Dischargers	76	69	54



This report shows environmental, demographic, and EJ indicator values. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 3 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

ATTACHMENT 3

**U.S. ENVIRONMENTAL PROTECTION AGENCY
REMOVAL ACTION**

**ADMINISTRATIVE RECORD
FOR THE
UNITY GROUND WATER SITE
UNITY, MARATHON COUNTY, WISCONSIN**

**ORIGINAL
SEPTEMBER, 2015**

<u>NO.</u>	<u>SEMS ID</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
1	920799	2/17/95	Ungerer, A., Environmental Compliance Consultants, Inc.	WDNR	Phase I Environmental Site Assessment Report	74
2	920800	12/6/10	WDNR	File	Case Closure Report for Unity Auto Mart	43
3	920822	6/11/14	Englebert, J., MSA Professional Services	Unity Residents	Sub Slab and Indoor Air Vapor Sampling Results <i>(Incorporated by reference to protect personally- identifying information)</i>	33
4	920823	7/29/14	Englebert, J., MSA Professional Services	Unity Residents	Water Supply Well Sampling Results <i>(Incorporated by reference to protect personally-identifying information)</i>	25
5	918791	8/15/14	U.S. EPA	File	Unity Groundwater Results	2
6	918790	1/26/15	Burns, C., Tetra Tech	Faryan, S., U.S. EPA	Final Site Assessment Report for the Unity Ground Water Site (With Cover Letter)	1010
7	918792	4/14/15	Fredrick, S., TestAmerica Laboratories, Inc.	Englebert, J., MSA Professional Services, Inc.	Analytical Report	48
8	920824	8/18/14	Englebert, J., MSA Professional Services	Unity Residents	Water Supply Well Sampling Results <i>(Incorporated by reference to protect personally-identifying information)</i>	123

9	920825	8/25/14	Englebert, J., MSA Professional Services	Unity Residents	Water Supply Well Sampling Results (<i>Incorporated by reference to protect personally-identifying information</i>)	70
10	920826	8/26/14	Englebert, J., MSA Professional Services	Unity Residents	Water Supply Well Sampling Results (<i>Incorporated by reference to protect personally-identifying information</i>)	93
11	-	-	Faryan, S., U.S. EPA	Karl, R., U.S. EPA	Action Memorandum: Request for Approval to Conduct a Time-Critical Removal Action at the Unity Ground Water Site (PENDING)	-

ATTACHMENT 4

DETAILED CLEANUP CONTRACTOR ESTIMATE

HAS BEEN REDACTED – TWO PAGES

NOT RELEVANT TO SELECTION

OF REMOVAL ACTION

ATTACHMENT 5

INDEPENDENT GOVERNMENT COST ESTIMATE

(SHARED WELL OPTION)

HAS BEEN REDACTED – TWO PAGES

NOT RELEVANT TO SELECTION

OF REMOVAL ACTION

ATTACHMENT 6

INDEPENDENT GOVERNMENT COST ESTIMATE

(CARBON FILTRATION OPTION)

HAS BEEN REDACTED – TWO PAGES

NOT RELEVANT TO SELECTION

OF REMOVAL ACTION