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

MEMORANDUM

REPLY TO THE ATTENTION OF

SUBJECT: Action Memorandum (short version): Request for a Removal Action at the Toledo Tie Treatment Plant Site ER (SSID # A563) located at Arco Industrial Park South, Frenchman's Road, Toledo, Ohio 43607

FROM: Sean Kane, On-Scene Coordinator
Emergency Response Branch 1
Emergency Response Section 2

THRU: Matthew Mankowski, Chief
Emergency Response Section 2

TO: Jason H. El-Zein, Chief
Emergency Response Branch 1

I. PURPOSE

The purpose of this Action Memorandum is to request and document approval of the selected removal action taken at the Toledo Tie Treatment Plant Site ER located in Toledo, Lucas County, Ohio 43607 (the Site) and a ceiling amount not to exceed $50,000 (approved by Branch Chief through Special Account Funding). This response action was necessary to mitigate the imminent threat to public health, welfare, and the environment posed by the release of coal tar creosote, which impacted a city storm sewer system and Williams Ditch (a tributary to the Ottawa River that drains to Lake Erie).

This Action Memorandum would serve as authorization for expenditures by the Environmental Protection Agency (EPA), as the lead technical agency, for actions described herein to abate the imminent and substantial endangerment posed by hazardous substances at the site. The response actions were conducted in accordance with Section 104(a)(1) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 42 U.S.C. § 9604(a)(1), and 40 C.F.R. § 300.415 of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) to abate the immediate threats posed to public health and/or the environment.

The presence of unsecured hazardous substances at the Site required that this action be classified as an emergency removal action. The project required approximately three on-site working days to complete.

There are no nationally significant or precedent setting issues associated with the response at this non-National Priority List (NPL) site.

II. SITE INFORMATION

A. Site Description

Site Name: Toledo Tie Treatment Plant Site ER
Superfund Site ID: A563
EPA ID: # OHD 066 060 608
Location: Arco Inc. Park S., Frenchman's Road, Toledo, Ohio 43607
Latitude: 41.6343122 degrees north
Longitude: -83.6202303 degrees west
Category: Emergency Response
Removal Start Date: April 25, 2017

B. Site Background

1. Removal site evaluation

The Toledo Tie Treatment (TTT) Site was part of a large, 50-acre railroad tie treatment facility owned and operated by the Federal Creosoting Company from 1923 to 1959 and from the 1959 to 1962 by the American Creosoting Corporation. During the period of operation, wooden railroad ties were treated with coal tar creosote (in order to preserve the ties) at the TTT Site by the Federal Creosoting Company and the American Creosoting Corporation. The Kerr-McGee Chemical Corporation, LLC (KMC) was the successor corporation of the American Creosoting Corporation. According to the Ohio Environmental Protection Agency (OEPA), an above ground storage tank farm was located onsite. The tank farm consisted of two 500,000 gallon (gal.), three 30,000 gal., and four 150,000 gal. creosote tanks and a 150,000 gal zinc chloride tank. The creosoting operations included several aboveground creosote storage dip tanks, a retort house, powerhouse, deep wells, and waste lagoons. At the height of production, this was one of Ohio's largest wood-preserving facilities during the 1950's (Administrative Record [AR] #1).

Operations continued until 1962 when the property was sold to the City of Toledo. In 1969 the property was sold to, and developed by Arco Realty Inc. and was subdivided into a number of parcels and developed into a business and industrial park. The parcels that comprise the TTT Site are currently owned by a number of different parties and contain a number of different businesses. None of the businesses currently operating produce or utilize creosote in any way (AR #1).

According to OEPA records, a series of investigations by private parties at the TTT Site from 1987 to 1990 indicated contamination with polycyclic aromatic hydrocarbons (PAHs) which are compounds found in coal tar creosote (AR #3).

In 1993, OEPA conducted a Site Inspection (SI). The SI included collection of five soil samples, two sediment samples and two surface water samples from Williams Ditch. The analyses of soil samples demonstrated very high concentrations of 18 PAH compounds in the area of the former waste (creosote) lagoons. OEPA concluded that the sediment in Williams Ditch near the

intersection of Frenchmen's drive and Arco Drive contained at least 1 foot of creosote. OEPA's analysis of the sediment confirmed the presence of PAH compounds, including phenanthrene, naphthalene, acenaphthene, benzo(a)pyrene, fluroanthene, pyrene, and chysene (AR #3).

In 1995, the Ohio Department of Health (ODH) conducted a health consultation at the TTT Site and determined that the on-site subsurface soils and sediments in Williams Ditch are saturated with creosote and contaminated with PAHs, including phenanthrene, naphthalene, acenaphthene, benzo(a)pyrene, fluroanthene, pyrene, and chysene (AR #2).

The U.S. EPA, along with the State of Ohio, was evaluating the use of non-time critical removal authority to address the contamination at the TTT Site when the National Response Center was notified of the presence of a sheen of an unknown oil in Williams Ditch by the National Super Service (NSS) on September 26, 1997. NSS, a commercial occupant of the Arco Industrial Park, also advised U.S. EPA that suspected creosote materials, were blocking a portion of its on-site storm water runoff system, and that oily sheen was present on Williams Ditch. On October 1, 1997, representatives of U.S. EPA's Emergency Response Branch (ERB) evaluated conditions in Williams Ditch within the Arco Industrial Park. Extensive oil sheening up gradient of the NSS storm sewer outfall to Williams Ditch between Arco Drive and the outfall of the NSS storm sewer system outfall was observed. The sheening was very heavy at a point in the ditch just east (50-100 feet) of Arco Drive and just north (50-100 feet) of the historic location of suspected creosote lagoon areas (AR #4).

These suspected former lagoon areas are also in the same location at which OEPA measured high levels of PAH contaminants in 1993. The portion of Williams Ditch with heavy sheening is the point at which a storm sewer appearing to transect through the lagoon area outfalls to Williams Ditch. It is also immediately adjacent to Frenchmen's Road, between the suspected lagoon areas and Williams Ditch, where the road surface had undergone failure and where visual indications of subsurface releases of oil to the road surface were readily apparent (AR #4).

On October 8, 1997, U.S. EPA was advised by contract personnel who had been dispatched to monitor site conditions that heavy accumulations of sheen were developing within Williams Ditch and that sheening upgradient in the vicinity of the historical lagoons was considerably heavier than previously observed. In addition, and for the first time, it was reported that sheen buildups were observed as far downgradient as Hill Avenue to the north of the industrial park. It was further reported that a release of oily contaminants directly to the failed portion of Frenchmen's Road was continuing at an increased rate (AR #4).

On October 10, 1997, consultants and contractors retained by KMC initiated oil containment and recovery efforts in Williams Ditch. On November 19, 1997, the U.S. EPA OSC advised KMC's on-site representatives and KMC that containment and recovery efforts were not satisfactory. On December 3 and 4, 1997, U.S. EPA advised KMC that if containment and recovery efforts were not conducted in a more complete, timely fashion, U.S. EPA would undertake response actions directly (AR #4).

On December 24th, 1997 a Unilateral Administrative Order (UAO) was issued to KMC to perform removal actions itself or retain a contractor to implement the removal actions. The U.S.

EPA approved work plans mandated by the order in April of 1998 and investigation activities were initiated pursuant to these work plans. The activities included sampling of air, sediment, soil and water in and around areas of suspected contamination. The data from these activities, coupled with a review of historical aerial photography, were used to formulate a removal action plan submitted to the U.S. EPA in July, 1998. The U.S. EPA requested additional information and clarification and the plan was resubmitted in August 1998. Conditional approval was granted on September 1, 1998 (AR #5).

KMC conducted a time-critical removal action (TCRA) from May 1998 through June 1999. Approximately 30,000 tons of hazardous waste material and 1,392 cubic yards of non-hazardous material was removed from the project area. Additionally, 700,000 gallons of water was treated from Williams Ditch and returned downstream of work area along with the disposal of 424,315 gallons of non-hazardous industrial wastewater (AR #5).

In 2003, Hull and Associates completed an Engineering Evaluation/Cost Analysis (EE/CA) and a detailed sampling plan of the TTT Site for KMC (AR #8).

On June 30, 2004 KMC submitted written notification to U.S. EPA pursuant to the December 24, 1997 UAO of a potential release event as reported to KMC by City of Toledo Division of Environmental Services (DES) and Toledo Fire Department representatives at the surface of Frenchmen's Road in the area of the former removal activities. After unusually heavy rains had receded, staining was observed on the grasses around storm water grates on both sides of Frenchmen's Road. KMC advised Toledo DES that they would voluntarily restore the area where the flooding had occurred primarily for aesthetic reasons (AR #7).

Subsequently, three additional events led OEPA to form a cooperative agreement with U.S. EPA and conduct an Expanded Site Investigation (ESI) of the TTT Site: a 2004 oil sheen from all onsite manholes; a 2006 discovery of buried creosote by the City of Toledo Water Department; and a 2006 discovery of creosote products in borings and ground water from an on-site voluntary cleanup. Between October 23-27, 2006 OEPA conducted the ESI and collected on-site soil, surface water and sediment samples from Williams Ditch. A total of 30 samples were collected at the Site. Significant findings from the investigation included high concentrations of PAH compounds and other coal tar constituents in on-site soils and Williams Ditch sediment. Phenanthrene, Napthalene and Pyrene were the highest contaminants detected on-site at 8,800,00 micrograms per kilogram (ug/kg), 7,900,000 ug/kg and 5,200,000 ug/kg respectively. There were also observed releases, observed contamination and targets (mainly workers). According to the KM web page, "On August 10, 2006, the shareholders of KM overwhelmingly approved the acquisition of KM by Anadarko Petroleum Corporation." Though the new owner is Anadarko, the PRP is referred to as Kerr-McGee (AR #8).

On April 24, 2017 City of Toledo Water Department personnel were repairing a leaking water line along Frenchmen's Road in Lucas County, Toledo, Ohio. In order to access the line a water main vault needed to be dewatered. During the dewatering process workers identified unusually discolored water and contacted Toledo DES who later conducted an assessment that identified gross staining of nearby grass, associated topsoil and asphalt along Frenchmen's Road. A stained pathway was also identified which lead to a city storm sewer. Further investigation

confirmed sheen downgradient from the storm sewer, within multiple man holes and within a portion of Williams Ditch. DES deployed absorbent boom within the ditch to limit sheen migration, contacted EPA on April 24, 2017 requesting assistance and reported the incident to the National Response Center (AR #9 NRC Report).

Due to the release of a hazardous substance into the environment and the city's inability to fund a clean-up, EPA mobilized its Emergency Response and Removal Contractors (ERRS) on April 25, 2017 to perform a fund-lead Removal Action.

2. Physical location and Site characteristics

The site is located within Arco Industrial Park South, along Frenchman's Road, Toledo, Lucas County, Ohio 43607. Coordinates are 41.6343122 degrees north, and -83.6202303 degrees west. The area is surrounded by commercial and light industrial properties.

Three schools are located within 1-mile of the site: Keyser Elementary School, Great Expectations Elementary School and Toledo Preparatory & Fitness Academy. There is one park located within 1-mile of the Site: Swan Creek MetroPark Preserve. There are eight public housing units associated with the Lucas Metropolitan Housing Authority within 1-mile of the Site. There are also numerous small businesses and houses of worship in the 1-mile radius extending from the Site.

An Environmental Justice (EJ) analysis for the Site is contained in Attachment 1. Screening of the surrounding area used Region 5's EJ Screen Tool. Region 5 has reviewed environmental and demographic data for the area surrounding the site, and determined there is a high potential for EJ concerns at this location.

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

A. Nature of Actual or Threatened Release of Hazardous Substances, Pollutants or Contaminants.

Creosote was identified within a water line vault and within a city storm sewer system that discharged to Williams Ditch (a tributary to the Ottawa River that drains to Lake Erie). No other entity other than EPA had the ability to respond and prevent further release.

Creosote is a listed hazardous substance and has many and varied effects on the human body. According to the Agency for Toxic Substances and Disease Registry (ATSDR), Creosote – ToxFAQs information sheet (AR #6), brief direct contact with large amounts of coal tar creosote may result in a rash or severe irritation of the skin, chemical burns, of the surface of the eyes, convulsions and mental confusion, kidney or liver problems, unconsciousness, and even death. Longer direct skin contact with low levels of creosote mixtures or their vapors can result in increased light sensitivity, damage to the cornea, and skin damage. Longer exposure to creosote vapors can cause irritation of the respiratory tract. The International Agency for Research on Cancer (IARC) has determined that coal tar is carcinogenic to humans and that creosote is probably carcinogenic to humans. The EPA has determined that coal tar creosote is a probable human carcinogen.

B. Check applicable factors (from 40 C.F.R. § 300.415) which were considered in determining the appropriateness of a removal action:

The conditions at the Site presented a substantial threat to the public health or welfare, and the environment, and met the criteria for an emergency removal action as provided for in the NCP, 40 C.F.R. § 300.415(b)(2). These criteria include, but are not limited to, the following:

> 1) Actual or potential exposure to nearby human populations, animals or the food chain from hazardous substances or pollutants or contaminants [40 C.F.R. § 300.415(b)(2)(i)];

This condition is present at the TTT Site because of the existence of PAHs in the soil and in the sediments of Williams Ditch as documented by OEPA's 2007 ESI. These PAHs are hazardous substances within the definition of Section 101(14) of CERCLA, 42 U.S.C. § 9601(14). Exposure to PAHs has been associated with adverse skin effects and the development of lesions and skin cancer in animals and humans. Access to Williams Ditch is completely uncontrolled from Hill Avenue. Utility workers, maintenance personnel, other employees of businesses in the Arco Industrial Park, and area children are all examples of persons who could readily contact PAH-contaminated sediments and floating surface oils in Williams Ditch.

> 2) High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface, that may migrate [40 C.F.R. § 300.415(b)(2)(iv)];

This condition is present at the TTT Site due to the existence of PAH contamination containing hazardous substances in soils at the Site and in Williams Ditch which flows off-site and discharges into the Ottawa River and ultimately into Lake Erie. The presence of PAHs which are constituents of coal tar creosote in Williams Ditch and along the water line adjacent to Frenchmen's Road confirms that such wastes continue to passively migrate along preferential pathways and to the ditch.

Historic site investigations as stated above in the background section supports the conclusion that the migration of contaminants to the ditch and the reoccurring exposures to utility workers from former operations areas of the site is increasing and is likely to continue until the coal tar creosote and associated contaminated soils have been removed or alternative engineering controls are implemented at the TTT site.

3) Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released [40 C.F.R. § 300.415(b)(2)(v)];

Flow from Williams Ditch downstream is naturally accelerated by heavy rainfall and runoff. Such weather conditions contribute to further contamination of the Ottawa River and Lake Erie by accelerating the flow of subsurface contaminants to the surface of the TTT Site and to Williams Ditch.

Additionally, during heavy rain events, the inability of Williams Ditch to accommodate all flows of storm water runoff has resulted in creosote-generated oils from the ditch surface and sediments to be potentially released over the banks of the ditch, to the road surface and adjoining commercial/industrial properties.

4) The [lack of] availability of other appropriate federal or state response mechanisms to respond to the release [40 C.F.R. § 300.415(b)(2)(vii)].

At the time, no entity was able to initiate the cleanup in a timely manner and the City of Toledo Division of Environmental Services (DES) had requested EPA's assistance.

IV. ENDANGERMENT DETERMINATION

Given the Site conditions, the nature of the known 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 have presented an imminent and substantial endangerment to public health, or welfare, or the environment.

V. SELECTED REMOVAL ACTIONS AND ESTIMATED COSTS

A. Situation and Removal Actions to Date

1. Current Situation

Removal is complete.

2. Removal activities to date

At the request of City of Toledo DES, EPA responded on April 25, 2017 to conduct a Removal Action.

On April 25, 2017 EPA arrived on-site and met with representatives of DES and Public Utilities representatives to determine the current status of the release. The EPA Superfund Technical Assessment and Response Team (START) conducted air monitoring activities in the immediate area of the vault, storm sewer and associated storm sewer outfalls. Air monitoring rounds were conducted to determine the absence or presence of benzene, volatile organic compounds (VOCs) and the lower explosive limit (LEL). START utilized a benzene specific monitor, a flame ionization detector (FID) and a MultiRAE Pro with a parts per billion (ppb) photo ionization detector (PID) to measure VOCs and LEL. VOC levels ranged from .01 to 0.18 parts per million (ppm), FID readings ranged from 0.5 to 3.5 ppm. There were no elevated LEL levels identified throughout the air monitoring surveys.

EPA's Emergency and Rapid Response Services (ERRS) Contractors removed and drummed the impacted grass and topsoil, utilized citrus spray and oil dry compound to lessen the gross staining and removed residue on Frenchmen's road leading to the storm sewer. Absorbent booms were placed within three manholes (approximate depth of 10 feet) and in Williams Ditch. An absorbent boom previously deployed by DES at Hill road was periodically monitored and no sheen or product was identified at this location during response efforts.

On April 26th, in conjunction with DES representatives, EPA dewatered the vault utilizing a pump and filtration system, a series of absorbent booms and pads up gradient of the storm sewer. Discharged water was visually monitored by EPA, START and DES representatives prior to re-entry to the storm sewer. Once the vault was dewatered, Public Works personnel were able to access the vault and repaired the leaking water line. START conducted an additional round of air monitoring at the storm sewer manholes that contained the absorbent booms, and VOC readings ranged from less than 0.1 ppm up to 1.64 ppm, benzene readings ranged from .05 ppm up to 2.35 ppm (Note: Manhole cover was closed and reading was obtained via extension tubing through a small opening in the manhole cover). No elevated LEL levels were identified. A total of three 55 gallon drums were filled with impacted soil and grass along with two 55 gallon drums with absorbent boom and pads utilized during the filtration process. The drums were temporarily staged in a secured location provided by the City of Toledo pending disposal analysis.

On May 24, 2017 EPA, ERRS and DES returned to the site, absorbent boom was removed from Williams Ditch, the storm sewer manholes and final disposal of the temporarily staged drums was conducted at a facility in compliance with the EPA Off-Site Rule, 40 C.F.R. § 300.440.

The response actions described in this memorandum directly addressed actual or potential releases of hazardous substances on-site, which may have posed an imminent and substantial

endangerment to public health, or welfare, or the environment. Specific removal activities included:

1) Developing and implementing a Site Health and Safety Plan;

2) Conducting air monitoring;

3) Deployment of absorbent boom and pads;

4) Dewatering and filtration of coal tar impacted water from a service vault;

5) Characterizing, removing, and properly disposing of coal tar creosote contaminated materials in accordance with EPA's Off-Site Rule (40 C.F.R. § 300.440)

EPA conducted the removal action in a manner not inconsistent with the NCP. The OSC initiated planning provisions for post-removal site control consistent with the provisions of section 300.415(l) of the NCP. No post-removal site controls were necessary.

This response action did not impose a burden on the affected property that was disproportionate to the extent to which that property contributed to the conditions being addressed.

3. 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 $21,752[1].

($9,716 + $4,000) + (58.49% x $13,716) = $ 21,752

B. Planned Removal Actions

1. Proposed action description

N/A

[1] Direct Costs include direct extramural costs and direct intramural costs. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of site specific direct costs, consistent with the full cost accounting methodology effective October 2, 2000. These estimates do not include pre-judgement 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.

2. Contribution to remedial performance

N/A

3. ARARs

Removal Actions conducted under CERCLA are required to attain applicable or relevant and appropriate requirements (ARARs) to the extent practicable. In determining whether compliance with ARARs is practicable, the OSC may consider appropriate factors, including the urgency of the situation and the scope of the removal action to be conducted. EPA complied with all ARARs of Federal and State laws to the extent practicable considering the emergency exigencies of the circumstances.

4. Project Schedule

These removal activities required approximately 3 working days to complete.

C. Estimated Costs

REMOVAL ACTION PROJECT CEILING ESTIMATE	
Extramural Costs: Regional Removal Allowance Costs: Cleanup Contractor Costs	$7,567.76
Other Extramural Costs Not Funded from the Regional Allowance: START	$2,150.00
Subtotal	$9,717.76
Total Removal Project Ceiling*	$9,717.76.

An Independent Government Cost Estimate is included in Attachment 3.

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

Given the conditions at the Site including the nature of the hazardous substances and pollutants
or contaminants documented on-site, the potential exposure pathways to nearby populations described in Sections II, III and IV above, and the actual or threatened release of hazardous substances and pollutants or contaminants from the Site, failing to take or delaying action may have presented an imminent and substantial endangerment to public health, welfare or the environment by increasing the potential that hazardous substances would have been released, thereby threatening the adjacent population and the environment.

VIII. Outstanding Policy Issues

None

VIII. Approvals

This decision document represents the selected removal action for the Toledo Tie Treatment Site (SSID # A563) located in Toledo, Lucas County, Ohio 43607, developed in accordance with CERCLA as amended, and not inconsistent with the NCP. This decision is based on the administrative record for the Site (Attachment 2).

Conditions at the Site met the criteria set forth in section 300.415(b)(2) of the NCP for a removal action, and I recommend your approval of the completed removal action documented in this Action Memorandum.

The total project ceiling, was approved for $50,000, of which $9,717.76 was used for cleanup contractor costs. You may indicate your approval by signing below.

APPROVE: _____ DATE: 6-14-2018
Jason H. El-Zein, Chief
Emergency Response Branch 1

DISAPPROVE:_____DATE:_____
Jason H. El-Zein, Chief
Emergency Response Branch 1

Enforcement Addendum

Attachments
I. EJ Analysis
II. Administrative Record Index
III. Independent Government Cost Estimate

cc: S. Ridenour, U.S. EPA, (email: Ridenour.Steve@epa.gov)
L. Nelson, U.S. Department of Interior, **w/o Enf. Addendum**
(Email: valincia_darby@ios.doi.gov)
Craig Butler, Director, Ohio EPA **w/o Enf. Addendum**
(Email: craig.butler@epa.state.oh.us)
Mike DeWine, Ohio Attorney General **w/o Enf. Addendum**
(Email: Mike.DeWine@ohioattorneygeneral.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

ATTACHEMNT I

U.S. ENVIRONMENTAL PROTECTION AGENCY
REMOVAL ACTION

ENVIRONMENTAL JUSTICE ANALYSIS FOR THE TOLEDO TIE TREATMENT SITE ER TOLEDO, LUCAS COUNTY, OHIO

June 2018

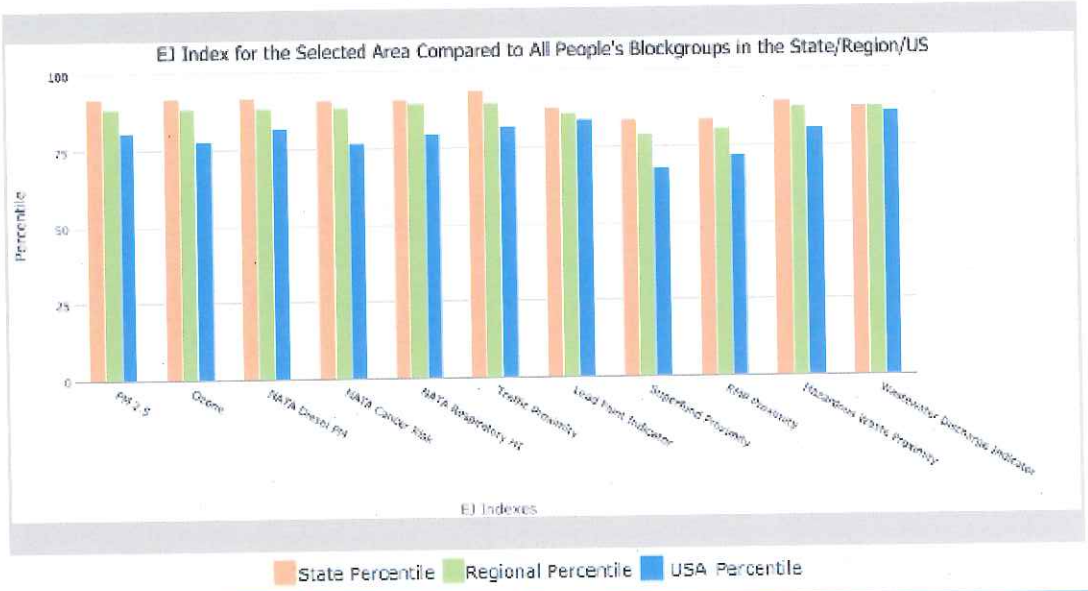
EJSCREEN Report (Version 2017)

1 mile Ring Centered at 41.634310,-83.619751, OHIO, EPA Region 5

Approximate Population: 7,683

Input Area (sq. miles): 3.14

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
EJ Indexes			
EJ Index for PM2.5	92	89	81
EJ Index for Ozone	92	89	78
EJ Index for NATA* Diesel PM	92	89	82
EJ Index for NATA* Air Toxics Cancer Risk	91	89	77
EJ Index for NATA* Respiratory Hazard Index	91	90	80
EJ Index for Traffic Proximity and Volume	94	90	82
EJ Index for Lead Paint Indicator	88	86	84
EJ Index for Superfund Proximity	84	79	68
EJ Index for RMP Proximity	84	81	72
EJ Index for Hazardous Waste Proximity	90	88	81
EJ Index for Wastewater Discharge Indicator	88	88	86



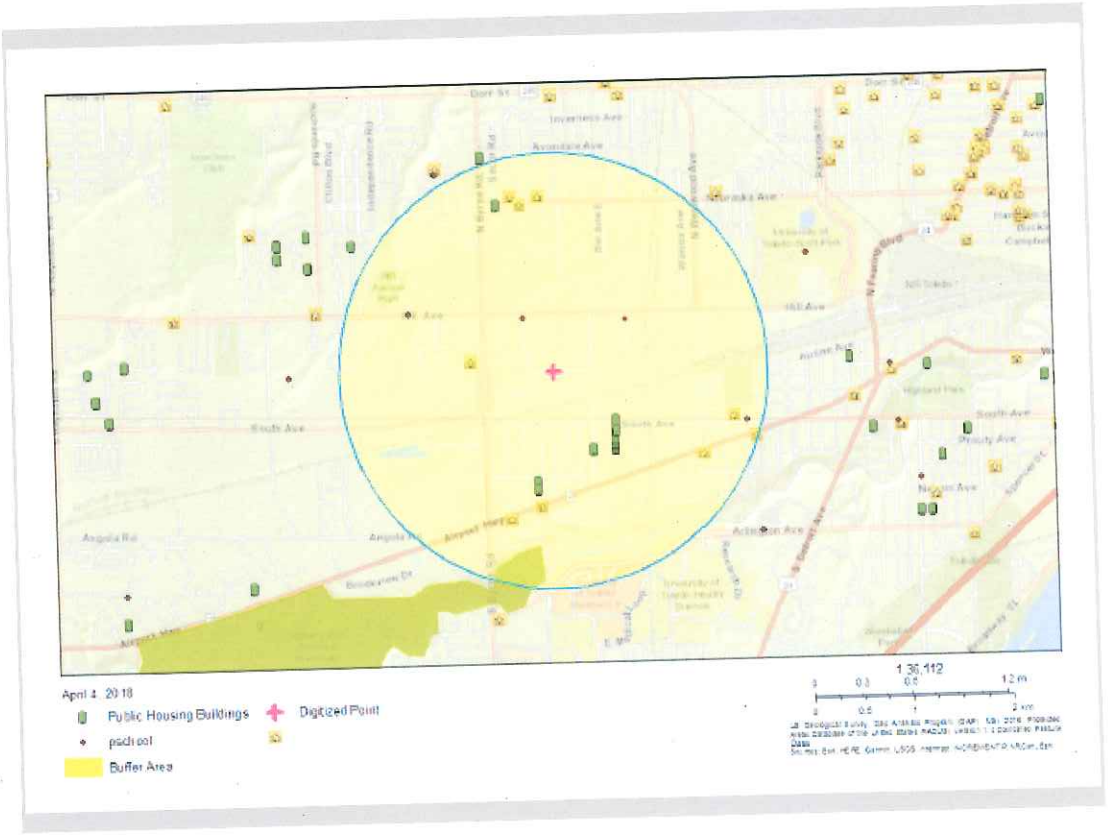
This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective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

EJSCREEN Report (Version 2017)

1 mile Ring Centered at 41.634310,-83.619751, OHIO, EPA Region 5

Approximate Population: 7,683

Input Area (sq. miles): 3.14



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

EJSCREEN Report (Version 2017)

1 mile Ring Centered at 41.634310,-83.619751, OHIO, EPA Region 5

Approximate Population: 7,683

Input Area (sq. miles): 3.14

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Environmental Indicators							
Particulate Matter (PM 2.5 in µg/m³)	10.2	10.7	21	10.1	50	9.14	78
Ozone (ppb)	35.6	37.6	20	37.6	17	38.4	20
NATA* Diesel PM (µg/m³)	1.29	0.997	74	0.932	70-80th	0.938	70-80th
NATA* Cancer Risk (lifetime risk per million)	37	37	57	34	70-80th	40	<50th
NATA* Respiratory Hazard Index	2.2	1.8	74	1.7	80-90th	1.8	70-80th
Traffic Proximity and Volume (daily traffic count/distance to road)	230	170	81	370	69	590	64
Lead Paint Indicator (% Pre-1960 Housing)	0.4	0.42	55	0.39	58	0.29	69
Superfund Proximity (site count/km distance)	0.016	0.095	8	0.13	5	0.13	13
RMP Proximity (facility count/km distance)	0.26	0.7	46	0.81	42	0.73	46
Hazardous Waste Proximity (facility count/km distance)	0.075	0.097	62	0.091	64	0.093	64
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	0.0014	17	47	4.2	59	30	69
Demographic Indicators							
Demographic Index	59%	27%	90	29%	88	36%	81
Minority Population	57%	20%	89	25%	85	38%	72
Low Income Population	62%	34%	87	33%	88	34%	87
Linguistically Isolated Population	2%	1%	79	2%	71	5%	56
Population With Less Than High School Education	18%	11%	80	11%	81	13%	71
Population Under 5 years of age	7%	6%	64	6%	62	6%	60
Population over 64 years of age	10%	15%	27	14%	31	14%	35

* The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: https://www.epa.gov/national-air-toxics-assessment.

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

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

ATTACHMENT II

U.S. ENVIRONMENTAL PROTECTION AGENCY
REMOVAL ACTION

ADMINISTRATIVE RECORD
FOR THE
TOLEDO TIE TREATMENT PLANT SITE ER
TOLEDO, LUCAS COUNTY, OHIO

ORIGINAL
AUGUST, 2017

NO.	SEMS ID	DATE	AUTHOR	RECIPIENT	TITLE/DESCRIPTION	PAGES
1	935230	9/7/1993	Wylie, K., Ohio EPA	U.S. EPA	Site Inspection (SI) Report	50
2	935228	12/5/1995	Ohio Department of Health	U.S. EPA	Health Consultation	10
3	935231	12/24/1997	Dollhopf, R., U.S. EPA	Muno, W., U.S. EPA	Action Memorandum - Determination of Threat to Public Health, Welfare, or the Environment at the Toledo Tie Treatment Site	11
4	935232	12/24/1997	U.S. EPA	Toledo Tie Treatment Plant Site	Administrative Order (AO) (Signed)	35
5	935229	2/1/2000	Hull & Associates Inc.	Kerr-McGee Chemical LLC	Time Critical Removal Action Documentation Report - Volume 1	564
6	934386	9/1/02	ATSDR	Public	Tox FAQs Fact Sheet - Creosote - CAS #8021-39-4, 8001-58-9, 8007-45-2	2
7	935227	6/30/04	Ladner, S., Kerr-McGee Chemical LLC	Dollhopf, R., U.S. EPA	Letter re: Notification of Potential Release Incident	12
8	935245	10/1/07	Link, E., Ohio EPA	U.S. EPA	Expanded Site Investigation (ESI) Report	178
9	934385	4/24/17	National Response Center	File	Incident Report #1176495	4

NO.	SEMS ID	DATE	AUTHOR	RECIPIENT	TITLE/DESCRIPTION
10	485114	4/28/17	Kelly, B., U.S. EPA	Distribution List	Pollution Report (POLREP) #1 - Initial
11	537490	6/1/17	Kelly, B., U.S. EPA	Distribution List	Pollution Report (POLREP) #2 - Final
12	-	-	Kane, S., U.S. EPA	El Zein, J., U.S. EPA	Action Memorandum re: Request for a Time-Critical Removal Action at the Toledo Tie Treatment Plant Site (***PENDING***)

ATTACHMENT III

DETAILED CLEANUP CONTRACTOR ESTIMATE

AND INDEPENDENT GOVERNMENT COST

ESTIMATE

HAS BEEN REDACTED – ONE PAGE

NOT RELEVANT TO SELECTION

OF REMOVAL ACTION