



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

June 7, 2023

REPLY TO THE ATTENTION OF:

SE-5J

MEMORANDUM

SUBJECT: Request for Approval of a Time-Critical Removal Action at the Spectron Industries Site, 317 S. Ottawa Street, Tecumseh, Lenawee County, Michigan 49286 (Site ID #C5WZ)

FROM: Joshua Peters, On-Scene Coordinator
Emergency Response Branch 1
Emergency Response Section 2

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

TO: Douglas Ballotti, Director
Superfund & Emergency Management Division

I. PURPOSE

This Action Memorandum is to request and document your approval to expend up to \$743,000 to conduct a time-critical removal action to remove 55-gallon drums, bulk containers, and small containers of hazardous substances at the Spectron Industries Site (Site).

The 0.25-acre Site is a former plating shop and a large quantity generator of hazardous waste since 2005 (AR#8). The Site is located at 317 South Ottawa Street, Tecumseh, Lenawee County, Michigan 49286 (Appendix A, Figure 1). The Site is in a commercial and residential area. It contains one building of 8,202 square feet on a 0.25-acre lot. The main area of the Site building consists of one floor with different rooms. The building has historically been utilized as a plating shop, machining shop, and miscellaneous commercial uses. Historic operations included chrome plating and tool machining. Spectron Industries, Inc., the property owner and former operator of a plating shop on Site, ceased operations in 2012 and now the property is currently vacant and unsecured (AR#8). The City of Tecumseh, through the Lenawee County Circuit Court, filed a demolition order to Spectron Industries, Inc on January 25, 2022 (AR#6).

The Site is bounded to the north and east by residential properties and to the south and west by commercial and industrial properties. Approximately 6,000 people reside within one mile of the facility (AR#8).

Imminent and substantial threats to human health and the environment at the Site include (AR#8):

- Unsecured building
- Trespassing and salvaging of materials
- Analytical results of EPA collected samples report Cadmium, Chromium, Cyanide, Lead, and Silver in solids and liquids stored within various containers.
- Analytical results of EPA collected samples report substances exceeding regulatory criteria (40 C.F.R. Part 261) for corrosivity.

Cadmium, Chromium, Cyanide, Lead, and Silver are defined as Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) hazardous substances by 40 C.F.R. § 302.4.

The proposed removal of hazardous substances would be taken pursuant to Section 104(a)(1) of CERCLA, 42 U.S.C. § 9604(a)(1), and 40 C.F.R. Section 300.415 of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). The Action Memorandum would serve as approval for expenditures by 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

II. SITE CONDITIONS AND BACKGROUND

Name: Spectron Industries

Superfund Site ID: C5WZ

CERCLIS ID: MIN000521864

Site Location: 317 South Ottawa Street, Tecumseh, Lenawee County, Michigan 49286

Lat/Long: 42.000269, -83.944139

Potentially Responsible Parties (PRPs): See Enforcement Addendum

NPL Status: Not on the NPL

Project Schedule: 50 working days

Category: CERCLA Time-Critical Removal

A. Site Description

1. Removal site evaluation

EPA was notified of potential hazardous substances present at the Site through communications with the City of Tecumseh. In an email dated September 7, 2022, the City of Tecumseh requested assistance from EPA to address the risks posed by the Site. (AR#7)

On December 2, 2022, EPA conducted a Removal Site Evaluation (AR#8) that documented the unsecured plating shop, drums, and hazardous waste onsite. The following materials and conditions at the former chrome plating shop were identified:

- 30 55-gallon drums
- 10 30-gallon containers
- 2 400-gallon vats
- Approximately 220 small containers (5 gallons or less)

Some labeled containers appeared to have been repurposed for waste storage based on the presence of secondary labels or handwritten labels.

Samples collected by EPA confirmed the presence of hazardous waste at the vacant, unsecured Site (see table below (AR#8)). Waste identified as hazardous is stored in 55-gallon drums, 30-gallon containers, two (2) 400-gallon vats, and various small containers. During the radiation survey, two (2) containers showed readings above background levels but below readings of low-level radioactive waste. Further characterization of the material using an x-ray fluorescence analyzer will be conducted to determine if special disposal is required.

Summary of EPA Sample Results				
Sample Number	Analyte	Sample Result	Hazardous Waste Criteria	Notes
SP-D01-120222	Chromium Silver	5.2 mg/L 13 mg/L	Chromium 5 mg/L Silver 1 mg/L	Exceeds Hazardous Waste Criteria
SP-D02-120222	pH	1.5 SU	< 2 or > 12.5	Exceeds Hazardous Waste Criteria
SP-D03-120222	Chromium Lead pH	14 mg/L 16 mg/L 1.7 SU	Chromium 5 mg/L Lead 5 mg/L < 2 or > 12.5	Exceeds Hazardous Waste Criteria
SP-D04-120222	Cadmium Chromium Lead pH	1.7 mg/L 34 mg/L 8.8 mg/L 1.9 SU	Cadmium 1 mg/L Chromium 5 mg/L Lead 5 mg/L < 2 or > 12.5	Exceeds Hazardous Waste Criteria
SP-V01-120222	Cadmium Chromium Lead pH	3.5 mg/L 110 mg/L 18 mg/L 0.8 SU	Cadmium 1 mg/L Chromium 5 mg/L Lead 5 mg/L < 2 or > 12.5	Exceeds Hazardous Waste Criteria
SP-V02-120222	Cadmium Chromium Lead Cyanide Silver	48 mg/L 14,000 mg/L 500 mg/L 34 mg/L 350 mg/L	Cadmium 1 mg/L Chromium 5 mg/L Lead 5 mg/L No Value Silver 1 mg/L	Exceeds Hazardous Waste Criteria

EPA Sample Locations



<p>Reference Map</p> <p>Approximate Site Location</p>	<p>Legend</p> <ul style="list-style-type: none"> ⊕ Suspect Underground Storage Tank Pipe ● Sample Locations ■ Containers ▲ 3 Pad-mounted Transformers - - - Approximate Site Boundary ■ Site Building <div style="text-align: right;"> <p>N</p> <p>0 25 50</p> <p>Feet</p> <p><small>Source: USGS & The National Map</small></p> </div>	<p>Spectron Site - RS 317 S Ottawa St. Tecumseh, Lenawee County, Michigan</p>
<p>Figure 3 Sample Locations</p>		
<p><small>DATE: 01/10/2023</small></p>	<p><small>EPA Contract No.: 68H051100005</small></p>	<p><small>File: 4985 For US EPA</small> <small>Prepared By: Tetra Tech, Inc.</small> <small>Coordinate System: NAD 83</small> <small>Date: 01/10/2023</small> <small>Units: Degrees</small></p>

2. Physical location

The Site is located at 317 N. Ottawa Street, Tecumseh, Lenawee County, Michigan 49286 (Latitude/Longitude: 42.000269, -83.944139) south of M-50, approximately 0.7 miles from the River Raisin, and consists of a vacant plating shop. Located immediately around the Site are residential homes and a vacant commercial property.

3. Site characteristics

The building at the Site is located south of downtown Tecumseh, MI within a residential and commercial area. The building's doors and windows are unsecured, and evidence of trespassing (graffiti and broken doors) exist at the site. Unauthorized access to the building could lead to releases or affect the trespassers via inhalation or skin contact. Electricity to the building has been shut off, allowing freeze and thaw cycles to occur inside the building. Continued freeze-thaw weathering may cause the drums to rupture.

An Environmental Justice (EJ) analysis for the Site was conducted. 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 has determined there is a low potential for EJ concerns at this location (Attachment 2).

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

EPA collected six container samples. All six of the containers' samples exceeded one or more hazardous waste criteria for Cadmium, Chromium, Lead, Silver, and/or characteristically hazardous for corrosivity. The containers of hazardous wastes are abandoned at a vacant property subject to trespassing (AR#8). Unless the hazardous wastes are removed from the Site, trespassing, fire, or weather conditions may cause the hazardous wastes to migrate beyond the site boundaries.

5. NPL status

The Site is not listed on the NPL and has not been proposed for listing on the NPL. The Site has not received a Hazard Ranking Score and is not being referred to the NPL Site Assessment Program.

6. Maps, pictures, and other graphic representations

Attachments 3 and 4 show the location and photographs of the Site.

B. Other Actions to Date

1. Previous actions

The City of Tecumseh inspected the property and has referred it to EPA due to suspected hazardous substances (AR#7).

2. Current actions

None

State and Local Authorities' Roles

1. State and local actions to date

The City of Tecumseh obtained a demolition order on January 25, 2022 to Spectron Industries, Inc. The Order states the structure on the Site property must be demolished as it is so deteriorated or dilapidated as to be dangerous, unsafe, insanitary, or otherwise unfit for habitation or occupancy (AR#6).

2. Potential for continued state/local response

Given the exigency of the situation, local governments do not have the resources to conduct a removal action at the Site.

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

The conditions at the Site present a substantial threat to the public health or welfare, and the environment, and meet the criteria for a time-critical removal action, pursuant to the NCP at 40 C.F.R. § 300.415(b)(1), based on the following factors in 40 C.F.R. § 300.415(b)(2).

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

Actual and potential exposures to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants exist at the Site. There is a documented presence of hazardous substances, as defined by Section 101(14) of CERCLA, 42 U.S.C. § 9601(14), onsite, including cadmium, chromium, lead, silver, and wastes consistent with the parameters likely to be classified as characteristically hazardous including for toxicity; and pollutants and contaminants as defined by Section 101(33) of CERCLA, 42 U.S.C. § 9601(33).

Human exposure can occur from inhalation of toxic ambient air vapors; inhalation via fugitive dust generation; dermal contact with spilled contaminants; and incidental ingestion of material following dermal contact. Exposure could occur due to vandalism of containers within the building. Graffiti and broken windows were observed during the site assessment (AR#8).

Potential human receptors include trespassers, emergency workers, nearby residents and community members.

EPA's site assessment documented hazardous wastes in 55-gallon drums and 400-gallon vats at the Site. The drums are located at the Site, which is approximately 0.7 miles from the River Raisin. There are homes immediately surrounding the Site. Trespassing, fire, or weather may cause the hazardous wastes to migrate beyond the boundaries of the Site.

Information on toxicological effects of certain hazardous substances, pollutants, and contaminants identified on site is listed below and referenced in the Administrative Record (Attachment 1):

Cadmium: According to the Agency for Toxic Substances and Disease Registry, exposure to hazardous substances such as Cadmium may damage the lungs and long-term exposure leads to a buildup of cadmium in the kidneys and possible kidney disease. EPA determined that cadmium is a probable human carcinogen (AR#3).

Chromium: Breathing high levels of chromium (VI) can cause irritation to the lining of the nose, nose ulcers, runny nose, and breathing problems, such as asthma, cough, shortness of breath, or wheezing. The concentrations of chromium in air that can cause these effects may be different for different types of chromium compounds, with effects occurring at much lower concentrations for chromium (VI) compared to chromium (III) (AR#4).

Cyanide: Exposure to high levels of cyanide for a short time harms the brain and heart and can even cause coma and death. Workers who inhaled low levels of hydrogen cyanide over a period of years had breathing difficulties, chest pain, vomiting, blood changes, headaches, and enlargement of the thyroid gland (AR#2).

Lead: Lead exposure can cause anemia (low iron in the blood) and damage to the kidneys. It can also cause increases in blood pressure, particularly in middle-aged and older individuals. Exposure to high lead levels can severely damage the brain and kidneys and can cause death. In pregnant women, exposure to high levels of lead may cause a miscarriage. In men, it can cause damage to reproductive organs (AR#5).

Silver: Exposure to high levels of silver for a long period of time may result in a condition called argyria, a blue-gray discoloration of the skin and other body tissues. Lower-level exposures to silver may also cause silver to be deposited in the skin and other parts of the body; however, this is not known to be harmful. Argyria is a permanent effect, but it appears to be a cosmetic problem that may not be otherwise harmful to health (AR#1).

40 C.F.R. § 300.415(b)(2)(iii). Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release.

EPA identified 30 55-gallon drums, two (2) 400-gallon vats, hundreds of small containers of waste, and two (2) containers of waste exhibiting levels of radiation above background at the Site. Waste samples collected from the drums contained CERCLA hazardous substances, including characteristically hazardous waste, Cadmium, Chromium, Cyanide, Lead, and Silver (AR#8).

Safety data sheets indicate that a corrosivity hazard is present at the Site, as defined in Title 40 CFR 261.22. Corrosive wastes are acids or bases that have pH levels less than or equal to 2, or greater than or equal to 12.5.

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

The drums and containers at the Site are inside an unheated building with parts exposed to the elements from structure fire damage. Lenawee County averages 38.6 inches of rain (national average 38.1) and 27.7 inches of snow (national average 27.8) per year, based on data from the National Weather Service (NWS) between 2000-2022. Precipitation may cause containers and vats to overflow, releasing contaminants into the environment. Exposure of the waste to freezing and thawing may lead the drums to rupture and release hazardous waste into the environment. Once released, rain and snow melt may cause the hazardous wastes to migrate from the Site.

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

No other federal or state response mechanism is available to respond in a timely manner, given the exigencies of the situation. The City of Tecumseh referred the site to EPA on September 7, 2022 to assist with inventory and disposal of chemicals present at the Site (AR #7).

IV. ENDANGERMENT DETERMINATION

Given the conditions at the Site, the nature of the known and suspected hazardous substances on-site, and the potential exposure pathways described in Sections II and III above, actual or threatened releases of hazardous substances 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, or welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed action description

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

- a) Develop and implement a Site Health and Safety Plan to protect workers and the public during the cleanup, including but not limited to installing and maintaining fencing and warning signs, restricting access, and conducting air monitoring, as needed;
- b) Develop and implement a Removal Work Plan to:
 - Remove and dispose of debris to facilitate accessing waste containers;
 - Remove and dispose of waste containers, including drums, vats, and small containers of waste;

- Characterize radioactive material, remove and dispose of the waste;
 - Remove waste from plating vats and associated containers; and
 - Remove or reinforce building structure for safety purposes, if needed.
- c) Ensure that any hazardous substances, pollutants or contaminants sent off-site are treated, stored, and/or disposed of in accordance with the EPA Off-Site Rule, 40 C.F.R. § 300.440.
- d) 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 the public health or the environment.

The removal action will be conducted in a manner not inconsistent with the NCP. The On-Scene Coordinator (OSC) has initiated planning for provisions of post-removal site control consistent with the provisions of 40 C.F.R. § 300.415(1). It is expected that the removal of the hazardous waste and the waste containers will eliminate the need for post-removal site control.

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 to the environment. These response actions do not impose a burden on the affected property disproportionate to the extent to which that property contributes to the conditions being addressed.

2. Contribution to remedial performance

The proposed removal action at the Site will not impede future actions based on available information.

3. Engineering Evaluation/Cost Analysis (EE/CA)

Not Applicable

4. Applicable or relevant and appropriate requirements (ARARs)

All applicable, relevant and appropriate requirements (ARARs) of Federal and State law will be complied with to the extent practicable, considering the exigencies of the circumstances. On March 9, 2023, EPA sent a letter to EGLE to request State of Michigan ARARs (AR#9).

Federal ARARs may include

Chemical-Specific

None identified

Location- Specific

None identified

Action-Specific

Standards Applicable to Generation of Hazardous Waste, 40 CFR. Part 262
Standards Applicable to Transporters of Hazardous Waste, 40 CFR. Part 263
Standards Applicable for Waste Disposal, 40 CFR 300.440

5. Project Schedule

The removal should be completed within 50 working days of initiating the work.

Estimated Costs

The detailed cleanup contractor costs are presented in Attachment 6. Costs are projected as follows:

<u>Regional Removal Allowance Costs</u>	
Cleanup Contractor Costs (With 20% contingency)	\$554,000
<u>Other Extramural Cost Not Funded from the Regional Allowance:</u>	
START	\$65,000
Subtotal, Extramural Subtotal	<u>\$619,000</u>
Extramural Costs Contingency (20% of Subtotal)	\$124,000
TOTAL, Removal Action Project Ceiling	\$743,000

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

Given the conditions at the Site, the nature of the known and suspected hazardous substances on the 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 memorandum, may present an imminent and substantial endangerment to public health, or 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.¹


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 \$1,314,048.

$$\begin{array}{r} (\$743,000 + \$25,000^1) + (71.10\%^2 \times \$768,000) = \$1,314,048 \\ \$768,000 \qquad \qquad \qquad \$546,048 \end{array}$$

IX. RECOMMENDATION

This decision document represents the selected removal action for the Spectron Industries Site in Tecumseh, Lenawee County, Michigan, developed in accordance with CERCLA, as amended, and is not inconsistent with the NCP. This decision is based on the administrative record for the Site (Attachment 1). Conditions at the Site meet the NCP criteria at 40 C.F.R. § 300.415(b) for a removal action, and I recommend your approval of the removal action proposed in this Action Memorandum. The total project ceiling will be \$743,000. Of this, \$678,000 may be used for cleanup contractor costs.

You may indicate your approval by signing below.

Approve:	<u>X</u>  <i>for</i>	Date: <u>June 7, 2023</u>
	Douglas Ballotti, Director Superfund & Emergency Management Division Signed by: Environmental Protection Agency	
Disapprove:	<u>X</u>	Date: _____
	Douglas Ballotti, Director Superfund & Emergency Management Division	

¹ 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.

¹Direct Costs include direct extramural costs and direct intramural costs.

²Indirect 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

Enforcement Addendum

Attachments:

1. Administrative Record Index
2. Region 5 EJ Analysis
3. Project Location and Site Layout Maps
4. Photographs
5. Independent Government Cost Estimate
6. Detailed Cleanup Contractor Costs

cc: Steve Ridenour, U.S. EPA (Ridenour.Steve@epa.gov)
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Dana Nessel, Michigan AG, **w/o Enf. Addendum** (miag@michigan.gov)
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BCC PAGE HAS BEEN REDACTED

NOT RELEVANT TO SELECTION

OF REMOVAL ACTION

ENFORCEMENT ADDENDUM

HAS BEEN REDACTED

THREE PAGES

**ENFORCEMENT CONFIDENTIAL
NOT SUBJECT TO DISCOVERY FOIA
EXEMPT**

**NOT RELEVANT TO SELECTION
OF REMOVAL ACTION**

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

**ADMINISTRATIVE RECORD
FOR THE
SPECTRON INDUSTRIES SITE
TECUMSEH, LENAWEЕ COUNTY, MICHIGAN**

**ORIGINAL
APRIL, 2023
SEMS ID:**

<u>NO.</u>	<u>SEMS ID</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
1	980430	07/01/99	Agency for Toxic Substances and Disease Registry (ATSDR)	Publication	ToxFAQs Fact Sheet - Silver	2
2	980431	07/01/06	Agency for Toxic Substances and Disease Registry (ATSDR)	Publication	ToxFAQs Fact Sheet - Cyanide	2
3	980432	10/01/12	Agency for Toxic Substances and Disease Registry (ATSDR)	Publication	ToxFAQs Fact Sheet - Cadmium	2
4	980433	10/01/12	Agency for Toxic Substances and Disease Registry (ATSDR)	Publication	ToxFAQs Fact Sheet - Chromium	2
5	980434	08/01/20	Agency for Toxic Substances and Disease Registry (ATSDR)	Publication	ToxFAQs Fact Sheet - Lead	2
6	980435	01/25/22	State of Michigan Lenawee County Court	File	City of Tecumseh v Spectron Industries	4
7	980436	09/15/22	Swallow, D., City of Tecumseh	Mankowski, M., U.S. EPA	City of Tecumseh, MI - Abandoned Property	4
8	980437	02/08/23	Newton, D., Tetra Tech	Peters, J., U.S. EPA	Removal Site Assessment Letter and Report	1037

<u>NO.</u>	<u>SEMS ID</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
9	980438	03/09/23	Peters, J., U.S. EPA	White, J., EGLE	Request for Applicable or Relevant and Appropriate Requirements (ARARs)	3
10	980439	Pending	White, J., EGLE	Peters, J., U.S. EPA	Request for (ARARs)	****
11	*****	*****	*****	*****	Action Memorandum - Request for Approval and Funding for a Time Critical Removal Action (<i>Pending</i>)	****

ATTACHMENT 2 EJ ANALYSIS



EJScreen Report (Version 2.1)

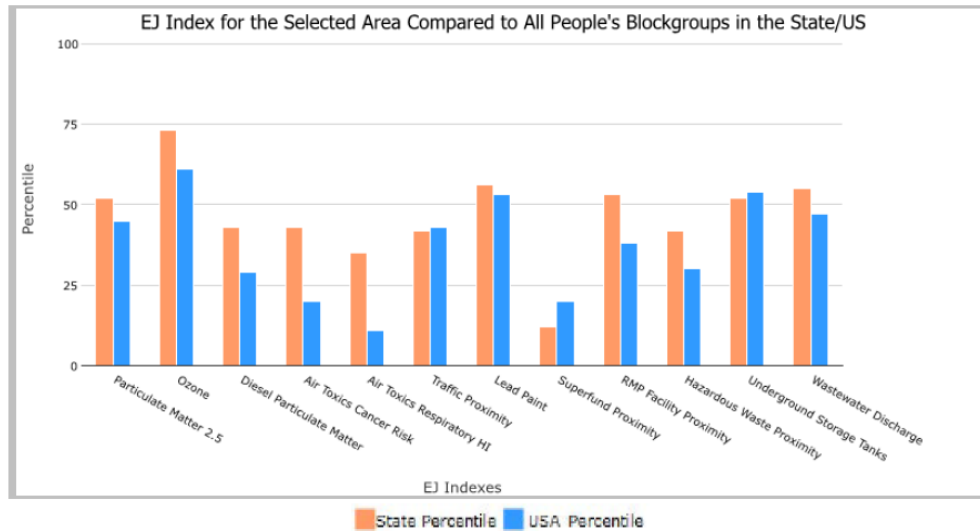


1 mile Ring Centered at 42.000428,-83.943973, MICHIGAN, EPA Region 5

Approximate Population: 4,474

Input Area (sq. miles): 3.14

Selected Variables	State Percentile	USA Percentile
Environmental Justice Indexes		
EJ Index for Particulate Matter 2.5	52	45
EJ Index for Ozone	73	61
EJ Index for Diesel Particulate Matter*	43	29
EJ Index for Air Toxics Cancer Risk*	43	20
EJ Index for Air Toxics Respiratory HI*	35	11
EJ Index for Traffic Proximity	42	43
EJ Index for Lead Paint	56	53
EJ Index for Superfund Proximity	12	20
EJ Index for RMP Facility Proximity	53	38
EJ Index for Hazardous Waste Proximity	42	30
EJ Index for Underground Storage Tanks	52	54
EJ Index for Wastewater Discharge	55	47



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.

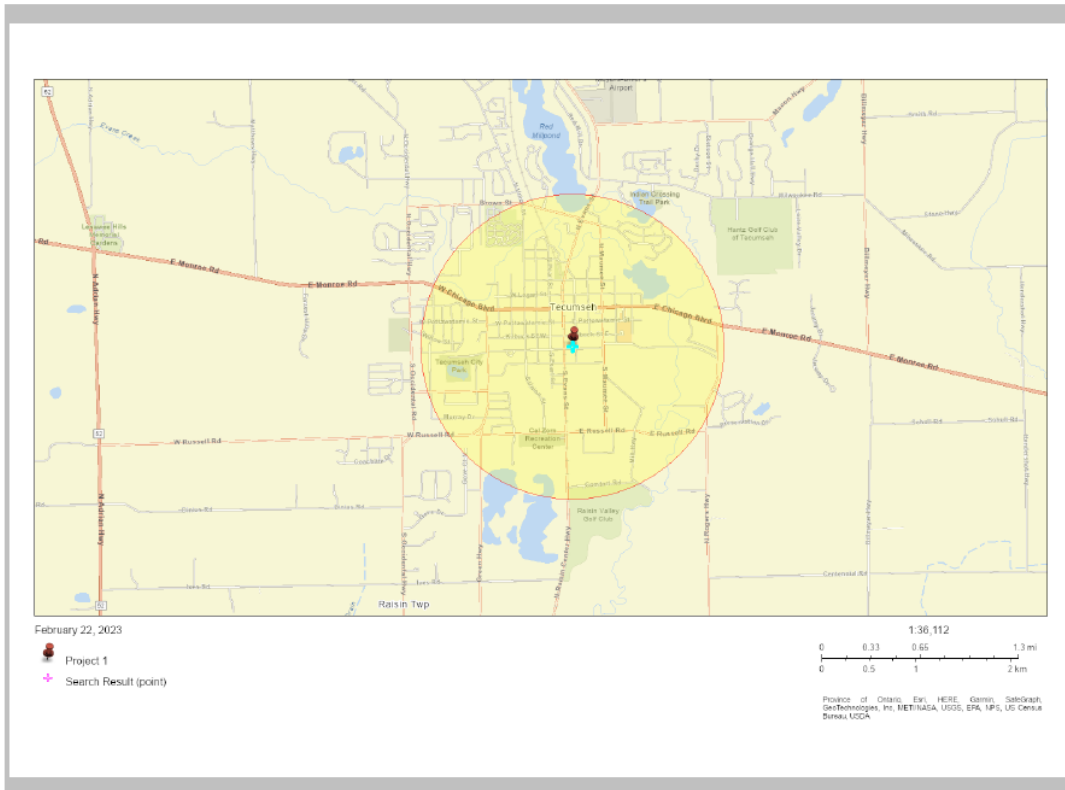
February 22, 2023

1/3

1 mile Ring Centered at 42.000428,-83.943973, MICHIGAN, EPA Region 5

Approximate Population: 4,474

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 2.1)



1 mile Ring Centered at 42.000428,-83.943973, MICHIGAN, EPA Region 5

Approximate Population: 4,474

Input Area (sq. miles): 3.14

Selected Variables	Value	State Avg.	%ile in State	USA Avg.	%ile in USA
Pollution and Sources					
Particulate Matter 2.5 ($\mu\text{g}/\text{m}^3$)	8.64	8.73	45	8.67	51
Ozone (ppb)	45.4	43.8	95	42.5	79
Diesel Particulate Matter* ($\mu\text{g}/\text{m}^3$)	0.14	0.211	32	0.294	<50th
Air Toxics Cancer Risk* (lifetime risk per million)	20	23	69	28	<50th
Air Toxics Respiratory HI*	0.2	0.25	50	0.36	<50th
Traffic Proximity (daily traffic count/distance to road)	310	910	41	760	56
Lead Paint (% Pre-1960 Housing)	0.43	0.37	61	0.27	68
Superfund Proximity (site count/km distance)	0.021	0.15	8	0.13	19
RMP Facility Proximity (facility count/km distance)	0.23	0.54	53	0.77	42
Hazardous Waste Proximity (facility count/km distance)	0.17	1.1	32	2.2	28
Underground Storage Tanks (count/km ²)	3.6	8	51	3.9	70
Wastewater Discharge (toxicity-weighted concentration/m distance)	0.0035	0.45	66	12	60
Socioeconomic Indicators					
Demographic Index	20%	28%	45	35%	32
People of Color	10%	26%	41	40%	24
Low Income	29%	31%	53	30%	53
Unemployment Rate	7%	6%	66	5%	69
Limited English Speaking Households	0%	2%	0	5%	0
Less Than High School Education	5%	9%	40	12%	35
Under Age 5	6%	6%	58	6%	55
Over Age 64	13%	17%	37	16%	41

*Diesel particulate matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: <https://www.epa.gov/haps/air-toxics-data-update>.

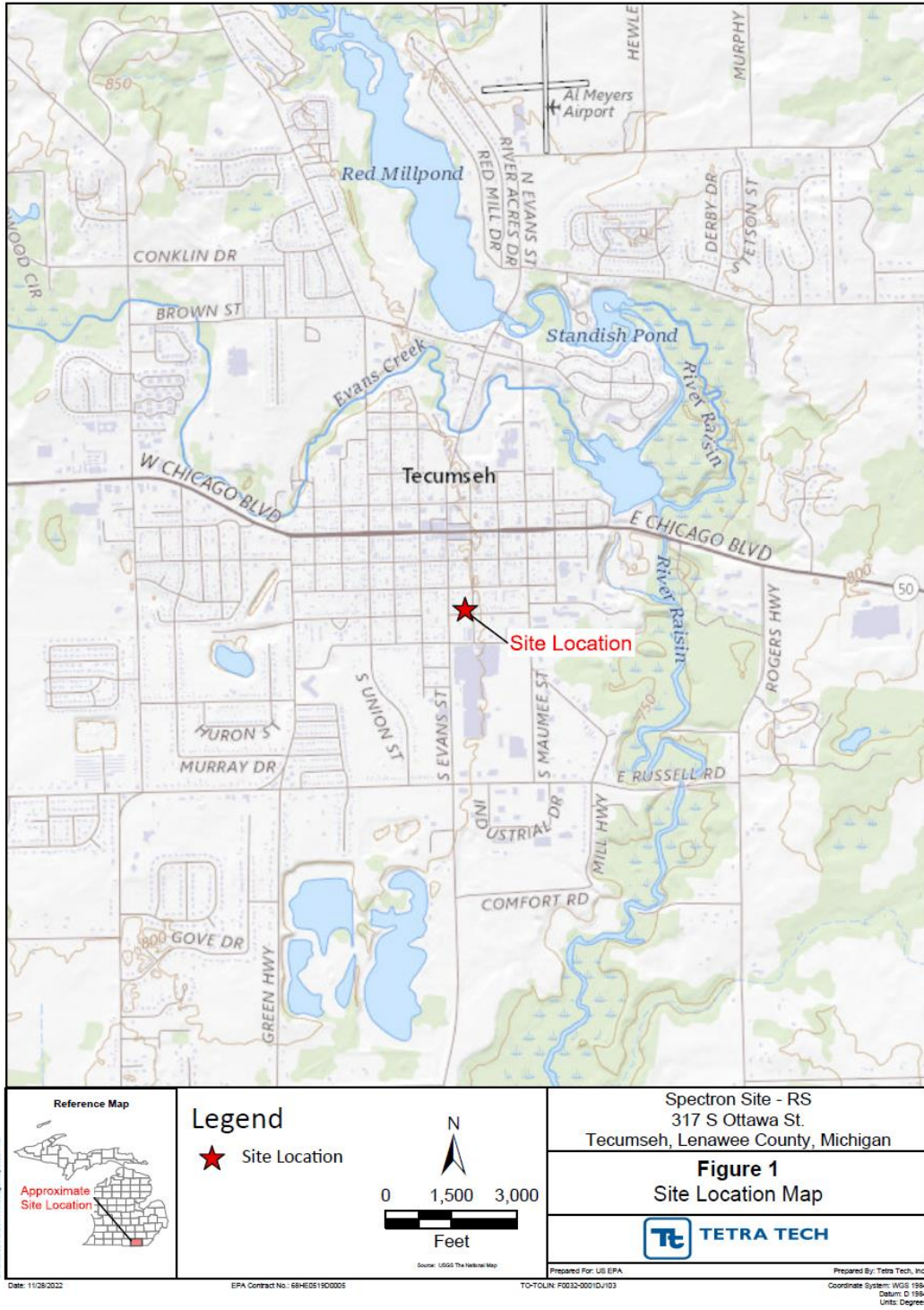
For additional information, see: www.epa.gov/environmentaljustice

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.

February 22, 2023

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ATTACHMENT 3 PROJECT LOCATION AND SITE LAYOUT MAPS





<p>Reference Map</p> <p>Approximate Site Location</p>	<p>Legend</p> <ul style="list-style-type: none"> Site Building Approximate Site Boundary 	<p>Spectron Site - RS 317 S Ottawa St. Tecumseh, Lenawee County, Michigan</p> <p>Figure 2 Site Layout Map</p>
<p>Date: 11/28/2022</p>		<p>Prepared For: US EPA</p>
<p>EPA Contract No.: 68HE01900005</p>		<p>Prepared By: Tetra Tech, Inc.</p>
<p>Source: USGS The National Map</p>		<p>Coordinate System: WGS 1984 Datum: D 1984 Units: Degrees</p>

**ATTACHMENT 4
PHOTOGRAPHS**



<p>Photo: 1</p> <p>Orientation: West</p> <p>Description: Spectron Site (Site) building</p>	
<p>Photo: 2</p> <p>Orientation: South</p> <p>Description: Trespasser graffiti on the Site building façade</p>	

Photo: 3

Orientation: South

Description:

Miscellaneous container with manually labeled chemicals (one of many found throughout the Site building)



Photo: 4

Orientation: South

Description: Second area inside the Site building with elevated levels of radiation as detected by the Ludlum monitor



Photo: 5

Orientation: North

Description: Sample location – Drum D01, a 55-gallon poly drum with unknown liquid contents



Photo: 6

Orientation: East

Description: Sample location – Vat V01, a 55-gallon steel vat



ATTACHMENT 5

**INDEPENDENT GOVERNMENT COST
ESTIMATE HAS BEEN REDACTED**

FIVE PAGES

**NOT RELEVANT TO SELECTION
OF REMOVAL ACTION**

ATTACHMENT 6

DETAILED CLEANUP

**CONTRACTOR COSTS
ESTIMATE**

HAS BEEN REDACTED

ONE PAGE

NOT RELEVANT TO

SELECTION OF

REMOVAL ACTION