UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
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October 18, 2010

RETURN RECEIPT REQUESTED
CERTIFIED UNITED STATES MAIL

Albert R. Axe, Jr.
Winstead PC
401 Congress Avenue
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90020762

RE: Final Decision
Dispute Resolution Regarding EPA's Decision for a Temporary Cover Designed for a Storm Event with a Return Period of 100 Years to Address the Time Critical Removal Action at the San Jacinto River Waste Pits Superfund Site
Administrative Order on Consent for Time Critical Removal Action
CERCLA Docket No. 06-12-10
San Jacinto River Waste Pits Superfund Site near Pasadena, Harris County, Texas

Dear Mr. Axe:

Having considered the temporary cover storm design dispute resolution record and your September 10, 2010 and September 30, 2010 letters, this letter encloses my final decision made on behalf of the United States Environmental Protection Agency (EPA). The Agency does not accept McGinnes Industrial Maintenance Corporation and International Paper's (hereinafter referred to collectively as "Respondents") 10 year design recommendation for the temporary cover as the Agency believes its decision to design the temporary cover for storm events with a return period of 100 years to address the imminent and substantial endangerment posed by the waste pits releasing dioxin into the San Jacinto River was not arbitrary and capricious.

My final decision concludes the dispute resolution process invoked by Respondents. As you know, this dispute concerns EPA's July 28, 2010, Decision Document requiring a temporary cover designed to withstand storms with a return period of 100 years while the nature and extent of contamination and a final remedy is selected for the San Jacinto River Waste Pits Superfund Site. The Administrative Order on Consent between EPA Region 6 and Respondents was finalized on May 11, 2010. As a result of the AOC, Respondents prepared a Time Critical Removal Action (TCRA) Alternatives Analysis for the San Jacinto Site. Upon review of the TCRA Alternative Analysis, the EPA issued its Decision Document for the Time Critical Removal Action at the San Jacinto River Waste Pits Site, Harris County, Texas (Decision Document), on July 28, 2010, calling for a temporary cover to be placed over the waste pits that are designed for a storm event with a return period of 100 years while the nature and extent of

contamination is being investigated and a remedy is selected for the Site. On August 11, 2010, Respondents requested and EPA met with Respondents to discuss questions and concerns that Respondents had relating to EPA's temporary cover design for storm events with a return period of 100 years as spelled out in EPA's Decision Document. After careful consideration of the issues raised by Respondents in the August 11, 2010 meeting, EPA's Remedial Project Manager for the San Jacinto River Waste Pits Superfund Site rejected Respondents' request for EPA to change its mind on the 100 year storm design and adopt Respondents 10 year storm event design for the temporary cover, in an email on August 13, 2010.

On September 10, 2010, Respondents invoked the dispute resolution process, contesting EPA's storm design with a return period of 100 years as spelled out in EPA's Decision Document. After engaging in telephone communication and the exchange of letters, the dispute remained unresolved. The final decision finds that Respondents must comply with EPA's Decision Document and design the temporary cover for storm events with a return period of 100 years. The final decision rendered by me is both incorporated into and made enforceable under the provisions of AOC Docket No. 6-12-10. For technical questions regarding this matter please contact Valmichael Leos at 214-665-2283. Legal and AOC compliance questions should be directed to Barbara Nann at 214-665-2157.

Sincerely yours,

Charles Faulkry
Associate Director
Remedial Branch, Superfund Division, Region 6

Enclosure

DISPUTE RESOLUTION-FINAL DECISION

SUBJECT: Decision Regarding Dispute over the Design of the Time Critical Removal Action with Respondents
Administrative Order on Consent for Time Critical Removal Action
CERCLA Docket No. 06-12-10
San Jacinto River Waste Pits Superfund Site near Pasadena, Harris County, Texas

I. SYNOPSIS OF DECISION

To address the imminent and substantial endangerment posed by the waste pits releasing dioxin into the San Jacinto River, EPA stands by its' July 28, 2010, Decision Document for the Time Critical Removal Action at the San Jacinto River Waste Pits Site, Harris County, Texas requiring a temporary granular cover on top of the hazardous dioxin waste pits designed to be protective for a storm event with a return period of up to 100 years while the nature and extent of contamination is determined and a permanent remedy is selected. The EPA at the hazardous substance at issue, examined the risk posed by the dioxin in the waste pits, evaluated all the potential and actual ongoing releases into the San Jacinto River, and analyzed how best to temporarily address the problem posed by the waste pit conditions in order to reach its design decision for the temporary cover designed for a storm event with a return period of 100 years. The EPA's Decision is consistent with the National Contingency Plan (NCP), EPA's Action Memorandum, EPA's Administrative Order on Consent and Statement of Work.

II. STANDARD OF REVIEW

The standard of review for the dispute is whether EPA's decisionmaker, with delegated presidential authority, acted arbitrarily and capriciously or otherwise not in accordance with law in selecting a response action, 42 U.S.C. § 113(j)(2). CERCLA actions require deference to the judgment of agency decisionmaker. Determining the appropriate removal action involves specialized knowledge and expertise, the choice of a particular cleanup method is a matter within the discretion of the EPA's decisionmaker. Deference is given to the EPA's choice of response action and courts will not substitute their own judgment for that of the EPA.

Respondents must demonstrate that the EPA acted arbitrarily and capriciously in choosing a particular response action to respond to a hazardous waste site. Under the "arbitrary and capricious" standard of review: Agency action will be set aside only if the agency has relied on factors which Congress has not intended it to consider, entirely failed to consider an important aspect of the problem, offered an explanation for its decision that runs counter to the evidence before the agency, or is so implausible that it could not be ascribed to a difference in view or the

product of agency expertise. A difference in opinion as to what the appropriate response action should be is not a reason to overturn the agency's decision.

III. RESPONDENTS' POSITION

Respondents' allege that EPA's Time Critical Removal Action (TCRA) Alternative recommending a storm event with a return period of 100 years is inconsistent with the NCP and is therefore arbitrary and capricious based upon the following reasons:

1. **Valmichael Leos's email, dated August 13, 2010, was the first time PRP's were informed clearly that the TCRA has to be designed for a storm event with a return period of 100 years**

The EPA issued the Time Critical Action Memorandum for the Time Critical Action Memorandum on April 2, 2010. Respondents prepared a TCRA Alternatives Analysis for the San Jacinto Site. In the Flow Analysis Report (an attachment to the TCRA Alternative Analysis), Respondents acknowledge that EPA designs for storm events with a return period of 100 years. Respondents chose to deviate from EPA's guidance and proposed a design for a 10 year flood event instead. Upon review of the TCRA Alternative Analysis, the EPA issued its Decision Document for the Time Critical Removal Action at the San Jacinto River Waste Pits Site, Harris County, Texas (Decision Document), on July 28, 2010, calling for a temporary cover to be placed over the waste pits that are designed for a storm event with a return period of 100 years while the nature and extent of contamination is being investigated and a remedy is selected for the Site. Respondents requested to meet with EPA to discuss questions and concerns relating to EPA's Decision Document on August 11, 2010. At the August 11, 2010, meeting, Respondents presented the differences between a cover designed for a storm event with a return period of 100 years versus a design for a ten year flood and asked EPA to reconsider its decision. Valmichael Leos, the Remedial Project Manager (RPM), considered Respondents' request and reviewed the Respondents' submittals from the meeting. Mr. Leos sent an email on August 13, 2010, stating that the EPA's preferred alternative remains unchanged as stated in EPA's Decision Document. At no point in time did Respondents appear confused as to what EPA required given the discussions and written acknowledgement of EPA requirements rather discussions after the issuance of EPA's Decision Document were limited toward trying to get EPA to change its mind.

2. **EPA accepted flood criteria early in the design of alternative as proposed at that meeting and spelled out in the "Design Storm Event: San Jacinto Superfund Site TCRA Memo" on which PRP's Technical Memorandum Outlining the Removal Alternatives for the TCRA at the May 20, 2010 meeting with EPA regarding the design of the TCRA alternatives.**

Valmichael Leos met with Respondents regarding the design of the TCRA Alternatives on May 20, 2010. Respondents claim that EPA accepted the idea that the cover should be designed only to a 10 year flood as opposed to designed to a storm event with a 100 year return as spelled out in Respondents' "Design Storm Event: San Jacinto Superfund Site TCRA Memo." At that meeting, Mr. Leos, the Site RPM, did not agree verbally or in writing to Respondent's proposed deviation from EPA guidance documents regarding the flood criteria. In addition, Respondents' Design Storm Event Memo acknowledges that a design for a 100 year storm event is what EPA guidance recommends. There was no approval by EPA, at any time during Respondents' development of the TCRA Alternative Analysis, to deviate from EPA guidance.

3. **Hurricane Ike should be the storm event on which TCRA is based. Ike had a 10 year flood event.**

Storm events have different flow events and Respondents are recommending a storm with a small flood event in comparison to other major storms that have happened in the area in the same time period that have a much higher flood event. Examples of other storms that had higher flood events than Hurricane Ike are Tropical Storm Allison in 2001 and the October 1994 Flood. Hurricane Ike had a flow of 63,100 cubic feet per second. Tropical Storm Allison had a flow of 126,000 cubic feet per second. The October 1994 Flood had a flow of 344, 348 cubic feet per second. EPA's decision to design a temporary cover that is designed for a storm event with a return period of 100 years would ensure that the cover will be effective for a storm event like Tropical Storm Allison and the October 1994 Flood given that these storms with high flow events occur frequently in the area in a short period of time.

4. **Changing the design of the removal alternative from a storm event with a return period of ten years to a storm event with a return period of 100 years makes it a new removal alternative because Respondents did not propose or design for this change.**

Respondents and EPA agreed that a granular cover of sand, gravel, or rock designed to temporarily contain and prevent hazardous waste from contaminating the environment and a rock revetment on the edges of the waste pits was appropriate to stabilize the Site until the nature and extent of contamination is determined and a remedy is selected. Respondents want to design the cover for a 10 year flow event while EPA wants to design the cover for a storm event with a return period of 100 years. EPA's preferred design change affects the thickness of the cap, size of rock cover, and total cost for project. The rock material needs to be placed on top of the waste pits and will act as a temporary cover to hold it into place. The design does not affect the type of technology being adopted in applying this alternative. A cover designed for a 10 year flow event is 6 inches and the cap surface has gravel covering a majority of the cover. A cover designed for a 100 year flood event is 8 inches thick and requires rocks to cover the majority of the cover.

Because rock is required instead of gravel, the cost for a cover with a design for a storm event with a 100 year return is 50% more expensive than a 10 year flow event. In fact, the changes between the two designs were so minimal that Respondents' were able to calculate and design EPA's 100 year storm requirement for the cover within two weeks and present it to EPA on August 11, 2010 in a power point presentation.

5. **EPA's TCRA Alternative is designed to permanently abate as opposed to temporarily abate the imminent and substantial endangerment finding for the waste pits.**

The intent of EPA's TCRA Alternative is to temporarily abate the release of dioxin into the San Jacinto River by building a cover that can withstand a storm event with a return period of 100 years while the nature and extent of contamination is being determined and a remedy is selected (potentially seven years but may be needed for a shorter or longer period of time). There are three stumbling blocks that will likely prevent a cover designed for a storm event with a return period of 100 years to be used as a long term remedy. First, even though EPA's Contaminated Sediment Guidance calls for a cap design of 100 years for a final remedy, the waste pits are not contaminated sediment. Rather, the waste pits are source material that is 100 times greater in concentration levels that the surrounding contaminated sediment. The 100 year requirement for contaminated sediment will not necessarily address the risk to human health and the environment posed by the waste pits given that the risk posed by the waste pits is much greater than the contaminated sediment surrounding the pits. Secondly, the temporary cover designed for a storm event with a return period of 100 years in all likelihood could not be a final remedy given the guidance that governs the treatment of dioxin and the fact the dioxin in the waste pits are principal threat wastes for which treatment of the waste is preferred (though the temporary cover designed for a 100 year storm event will be analyzed as a No Further Action remedial alternative). Lastly, EPA's engineers have stated that the cover will structurally fail if a storm event occurs that exceeds its design. Looking at the EPA TCRA Alternative as a possible long term remedy, according to Respondents' calculations, the percent chance of a 100 year flow event occurring in a 100 year design life of the cover is 63 percent. That percentage is too high of a risk of failure in the long term to be considered protective of human health and the environment and in all likelihood will not make a temporary cover designed for a storm event with a return event of 100 years a viable long term remedial option.

6. **EPA's TCRA Alternative does not adequately address long term remedial action alternatives.**

Currently, the remedial action alternatives being considered for the waste pits are excavation and offsite disposal, dredging and offsite disposal, confined disposal facility, or storage of the waste onsite via capping. EPA's TCRA Alternative does not prevent those

remedial alternatives. EPA does not agree with PRP's analysis that a temporary cover designed for a storm event with a return period of 100 years favors in-situ capping over removal of the waste. The EPA TCRA Alternative protects human health and the environment in the interim until a permanent remedy can be constructed such as excavation, dredging, or a confined disposal facility can replace the proposed cover being placed under the TCRA. The EPA would like to note that while the removal by excavation and off-site disposal or dredging and offsite disposal was not analyzed as a removal alternative, this does not mean it is not a viable remedial alternative. Removal by excavation or dredging were not analyzed as removal alternatives because not enough information is currently available regarding the conditions of the waste pits and the need for immediate action given the imminent and substantial endangerment caused from the release of dioxin into the San Jacinto River while the site information is gathered.

IV. EPA'S DECISION

The EPA's is requiring a temporary granular cover designed to be protective from a storm event with a return period of 100 years. This is necessary to temporarily address documented releases of highly toxic dioxin into the San Jacinto River which may result in an imminent and substantial endangerment to public health and welfare or the environment. The Decision meets the requirements outlined in the National Contingency Plan, the Action Memorandum, and the negotiated Administrative Order on Consent (AOC) in protecting human health and the environment while the nature and extent of contamination is evaluated and a final remedy is selected for the Site.

The EPA promulgated the National Contingency Plan pursuant to CERLCA, 42 U.S.C. § 9605 establishing procedures and standards for responding to releases of hazardous substances. Section 300.415(a)(1) of the National Contingency Plan (NCP) provides the lead agency with the authority to determine whether a removal action is necessary, and the appropriate extent of a removal action to be taken in response to a given release. It further provides that the determination will be based on a review of the removal site evaluation and the current site conditions. Section 300.415(b) lists factors to be considered in making the determinations. In evaluating whether a removal action was warranted for the waste pits, EPA reviewed the NCP, historical information regarding the Site, existing data for the concentrations within the waste pits, and conducted a removal assessment.

Evaluation of the waste pits indicated that they contained 2,3,7,8 TCDD (also known as dibenzo-p-dioxin), one of the most toxic forms of dioxin and a listed hazardous substance as defined in CERCLA Section 101(14), 42. U.S.C. § 9601(14), and further defined in 40 C.F.R § 302.4. Historical sampling results of the pits indicated high levels of dioxin, the highest concentration within the pits coming in at 41,300 parts per trillion. Subsequent sampling of the pits conducted by the Respondents in April 2010, resulted in concentrations which ranged from

100,000 parts per trillion up to 360,000 parts per trillion. The Action Memorandum dictated that any concentrations greater than or equal to 330 parts per trillion dibenzo-p-dioxin in the sediment within the original 1966 berm placement are considered part of the source area of contamination that has to be addressed with the protective barrier.

In addition to the waste pits containing extremely high concentrations of dioxins, the pits are located in a marshy area partially submerged into the San Jacinto River in Harris County, Texas, an area prone to extreme weather events (e.g., hurricanes, tropical storms, tropical depressions, and flooding). Land in the area of the Site is characterized by the Federal Emergency Management Agency as being within the 100 year flood plain requiring flood insurance. As part of the removal assessment, the Remedial Project Manager (RPM) visited the pits and documented grayish waste entering into the San Jacinto River along the Northwest corner of the western pit as well as the eastern pit was 95% under four feet of the water and in direct contact with the San Jacinto River.

According to the NCP, a removal action is appropriate where there is actual or potential exposure of human populations and animals or the food chain from hazardous substances, pollutants, or contaminants. 40 C.F.R § 300.415(b)(2)(i). Evaluating the conditions of the waste pits, EPA found that there was a potential for exposure of human populations and animals to dibenzo-p-dioxins as well as polychlorinated dibenzofurans, listed hazardous substances under CERCLA Section 101(14), 42 U.S.C. § 9601(14), and further defined at 40 C.F.R. §302.4. Releases of dibenzo-p-dioxins and polychlorinated dibenzofurans into the San Jacinto River were documented by the RPM during a Site visit. In addition, surface water and sediment samples collected during the site assessment indicated the presence of dibenzo-p-dioxins and polychlorinated dibenzofurans in the pits. From the removal evaluation and the Site assessment, EPA determined that people and animals that come onto the Site could be exposed to these contaminants through ingestion, skin contact and inhalation pathways. Routes of exposure include, but are not limited to: human direct dermal contact with contaminated sediment or water; human inhalation of contaminated sediment or water; human direct dermal contact with contaminated ecological receptors; human ingestion of contaminated ecological receptor; and ecological bioaccumulation of contaminants at every level of the food web.

The NCP also allows for a removal action where there are high levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface, which may migrate. 40 C.F.R. § 300.415(b)(2)(iv). At the Site, EPA found that the waste pits contained high concentrations of both dibenzo-p-dioxins and polychlorinated dibenzofurans were being released into the San Jacinto River. The RPM documented erosion of the western pit into the San Jacinto River. Samples of the western pit for dibenzo-p-dioxins and polychlorinated dibenzofurans concentrations ranged from 513 parts per trillion to 23,300 parts per trillion. In addition, the RPM documented that the eastern pit is partially submerged and is releasing

hazardous substances into the San Jacinto River. Samples of the eastern pit for dibenzo-p-dioxins and polychlorinated dibenzofurans concentrations ranged from 83 parts per trillion to 34,000 parts per trillion. Both pits are exposed to the elements with no cap or cover in place to act as a barrier to prevent migration of the dioxin into the environment. In addition, sampling of sediments surrounding the pits indicated that the dibenzo-p-dioxins and polychlorinated dibenzofurans had travelled from the pits to the surrounding sediment at least 100 feet.

The NCP also permits a removal action where weather conditions may cause the release or migration of hazardous substances or pollutants or contaminants. 40 C.F.R. § 300.415(b)(2)(v). The EPA found that the pits are located in an area that is prone to weather conditions that may cause the release or migration of dibenzo-p-dioxins and polychlorinated dibenzofurans. The area surrounding the pits receives an average of 50 inches of rain annually. In addition, the area has been and will continue to be susceptible to extreme weather conditions (e.g. storm winds, flooding, tornadoes, and hurricanes). The waste pits may be affected by tides, winds, waves, and currents resulting from these extreme weather conditions which may cause a potential release or migration of dioxin and furan contaminated materials.

Based upon the above listed findings, EPA determined that an actual or threatened release of hazardous substances from the waste pits at the Site and issued an Action Memorandum on April 2, 2010. The EPA further determined that the release and threatened release of dibenzo-p-dioxins and polychlorinated dibenzofurans presented an imminent and substantial endangerment to public health, or welfare, or the environment. The Action Memorandum required the immediate design and construction of a physical barrier surrounding both the waste pits that address the release or threat of release of dibenzo-p-dioxins and polychlorinated dibenzofurans into the San Jacinto River. In addition, the Action Memorandum required the barrier design and construction to be structurally sufficient to withstand forces sustained by the river and any potential future extreme weather events as well as to be structurally sound for a number of years until a final remedy is designed and implemented.

Upon issuance of the Action Memorandum, EPA negotiated and entered into an AOC to implement the Action Memorandum. Under the terms of the AOC, the Respondents were to draft a technical memorandum analyzing the removal alternatives for the Site that address the imminent and substantial endangerment posed by the waste pits at the Site. The EPA then reviewed this technical memorandum and received comments from the Texas Commission on Environmental Quality (TCEQ) and the Harris County Public Health and Environmental Services (HCPHES). After reviewing EPA guidance, other environmental agency comments, and the Respondents' technical memorandum, EPA issued a Decision Document, on July 28, 2010, calling for a temporary granular cover over the waste pits that was protective for storm events with a return period of 100 years while the nature and extent of contamination is evaluated and a remedy for the Site is selected.

The EPA's decision for a temporary granular cover that is protective for storm events with a return period of 100 years was made after thorough review and analysis of the conditions at the waste pits as well as EPA guidance and historical EPA protocol. Given the dynamic meteorological conditions of the area, the high toxicity of the hazardous substances at issue in the waste pits, and the vulnerability of those hazardous substances to the environment, EPA required a strong cover that could withstand unusual storm events susceptible to the area until the Site is fully characterized and a remedy is selected. The waste pits are source material. Because there is no guidance on source material that is placed on land and then sink into the water, the EPA used the EPA's Contaminated Sediment Guidance for design of the temporary cover because the pits located within the San Jacinto River and served as a basis on how to approach temporarily capping highly contaminated hazardous substances located in a waterway. The EPA's Contaminated Sediment Guidance recommends that the 100 year flow event is the starting point when evaluating the effects of a storm on a cover designed to act as a barrier for containing contaminated sediment. Given the waste pits contain source material which is much higher in concentration than the surrounding contaminated sediment, the location of the pits are partially inundated by the San Jacinto River, in an area that is prone to extreme weather events, and the dioxin numbers recorded in the pits are 100-200 times greater than the contaminated sediment surrounding the waste pits, EPA did not deviate from this standard even though it is for a temporary measure. According to EPA's engineers, if a storm event occurs that exceeds what the cover is designed for, erosion of the pits will occur and the highly toxic dioxin within the pits will migrate again into the San Jacinto River. The potential consequence to human health and the environment of this occurring is too great to justify lessening the design standard to a 10 year storm event as proposed by Respondents. Consultation with TCEQ confirmed that 100 year storm event is an appropriate standard given that that the 100 year storm event is routinely used for design criteria for projects in the Houston region to optimize protection of human health and the environment. In addition, HCPHES also confirmed that projects in the area use the 100 year storm event in their design criteria.

The EPA's decision to recommend a granulated cover designed for a storm event with a return period of 100 years is consistent with removal actions authorized under the NCP. The NCP articulates types of removal actions where there is a release or threat of release of a hazardous substance. Section 300.415(e)(4) expressly states that capping of contaminated soils or sludges where needed to reduce migration of hazardous substances or pollutants or contaminants into soil, ground or surface water, or air is appropriate is an appropriate removal action. The EPA's decision will temporarily stabilize contaminated sludges containing dibenzo-p-dioxins and polychlorinated dibenzofurans, listed hazardous substances, to prevent further migration of these substances into the surrounding soil and ground and surface water.

In addition, EPA's removal action to place a granular cover designed for a storm event with a return period of 100 years contributes to the efficient performance of any anticipated long-term remedial action with respect to the release concerned as required in the NCP. 40 C.F.R. § 300.415(d). A Remedial Investigation and Feasibility Study is currently being conducted at the Site. Dioxin is the contaminant of concern at the Site. The granulated cover designed for a storm event with a return period of 100 years was chosen by EPA because it best temporarily addresses the release of dioxins from the waste pits into the San Jacinto River as well as offered the most flexibility in selecting future remedies such as excavation, dredging, and on-site containment. The granular cover designed for a storm event with a return period of 100 years does not preclude a particular final remedy, nor does it adopt a particular final remedy. Whatever remedy is selected, the dioxin within the waste pits will have to be evaluated for treatment given that the NCP creates a preference for treatment to address the principal threats posed by the dioxins in the waste pits. 40 C.F.R. § 300.430(a)(1)(iii). In addition, the granular cover designed for a storm event with a return period of 100 years will have difficulty in being considered a permanent remedy because the cover is not being designed to be effective past the selection of the remedy which is estimated to occur in seven years and is unlikely to meet the requirement of long-term effectiveness, a key component for any final remedy selected by EPA. The percent chance of a 100 year flow event occurring in a 100 year design life of the cover is 63 percent which is too high of a risk of failure in the long term to be considered protective of human health and the environment. Any type of permanent on-site containment would in all likelihood be designed for a storm event greater than a 100 year period to be protective of human health and the environment given the waste pits are source material, highly toxic in nature, submerged into the San Jacinto River, and vulnerable to the extreme weather events that occur in the area.

V. **CONCLUSION**

By this final decision, Respondents are ordered to design the temporary cover for a storm event with a return period of 100 years. Per this final decision, the design of the TCRA dispute under AOC CERCLA Docket No. 6-12-10, is resolved. This final decision is incorporated into AOC CERCLA Docket No. 6-12-10, and is an enforceable part of the same AOC.

It is so Ordered this 18th day of October 2010.

By: United States Environmental Protection Agency

Charles Faultry, Associate Director
Remedial Branch, Superfund Division, Region 6