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

US EPA RECORDS CENTER REGION 5
494933

REPLY TO THE ATTENTION OF:

MEMORANDUM

SUBJECT: Request for Approval and Funding for a Time-Critical Removal Action and Exemption from the $2 million Statutory Limit at the former Intermet/Wagner Castings Site, Decatur, Macon County, Illinois (Site ID # C53X)

FROM: Craig Thomas, On-Scene Coordinator C.T.
Emergency Response Branch 2, Section 3

THRU: Samuel Borries, Chief
Emergency Response Branch 2

TO: Richard C. Karl, Director
Superfund Division

I. PURPOSE

The purpose of this Action Memorandum is to request and document your approval to expend up to $2,185,819 and grant an exemption from the $2 million statutory limit to conduct a time-critical removal action at the former Intermet/Wagner Castings Site (Site) located in Decatur, Macon County, Illinois. The proposed time-critical removal action will mitigate the threats to public health, welfare, and the environment posed by the presence of the following unsecured materials located at the Site: asbestos and asbestos containing material (ACM) in waste piles, polychlorinated biphenyl (PCB) filled capacitors, and chrome dioxide powder. The removal involves a nationally significant issue because the principal contaminant addressed by the removal is ACM. However, no precedent-setting issues are associated with this non-NPL Site.

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

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II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID: ILN000505575
RCRA ID:
State ID:
Category: Time-Critical Removal Action

The Site is a former castings facility in a mid-sized town in central Illinois. The Site consists of nine separate land parcels (properties) encompassing approximately 30 acres. Beginning in the 1880's, several manufacturing processes took place at the Site. Different land uses included the following operations: electroplating, operation of a radiation room, operation of a bulk petroleum plant, operation of several machine shops, and operation of several foundries. In 1917, Wagner Castings began operating a foundry at the Site which eventually became known as the Intermet Corporation facility. Wagner Castings was wholly-owned domestic subsidiary of the Intermet Corporation. Both Wagner Castings and the Intermet Corporation filed for Chapter 11 bankruptcy in September 2004, and subsequently closed operation at the Site in late 2005.

On May 27, 2008, the Illinois Environmental Protection Agency's (Illinois EPA) Division of Legal Counsel received a letter from Foley and Lardner, LLP, which was sent on behalf of Wagner Castings Company. The letter discussed the pending sale of the properties to the 825 North Lowber Street LLC (the LLC). The letter presented some brief environmental-related background conditions and details of the bankruptcy of the Wagner Castings Company. The letter also described the LLC as an "Ohio limited liability company formed for the purpose of buying and rehabilitating distressed properties to fit the economic needs of local communities." The LLC intended to raze the buildings and clear the properties. Once this was accomplished, the plan was to either sell the entire Site or portions of the Site to a new owner, or construct new buildings and other infrastructure on the Site to make them useful once again. The letter also stated that the LLC was mindful of the environmental issues at the Site and wanted to continue the remediation of the properties through Illinois EPA's Site Remediation Program (SRP).

A March 16, 2009, letter from the LLC's attorney, Ulmer Berne LLP, was directed to Illinois EPA as part of the Site's enrollment in the SRP, and states that the LLC had agreed to undertake full responsibility for completing remediation of the Site as part of an escrow arrangement requiring certain remedial obligations. The LLC began, but did not complete the proposed demolition and remediation activities.

A. Site Description

1. Removal site evaluation

On July 15, 2014 at the request of the City of Decatur, Illinois EPA's Office of Site Evaluation collected samples from the suspected areas of contamination at the Site. The State identified multiple 55-gallon drums stored in the Waste Storage Building. A photo ionization detector showed an elevated reading of volatile organic compounds (VOCs) in one of the drums, however, the laboratory flagged the sample collected from that drum as having insufficient volume to analyze. Also observed within the Waste Storage Building were several broken bags

of green powder; an X-Ray Fluorescence (XFR) analyzer detected levels of chromium in excess of 20,000 ppm, but a sample collected for Toxicity Characteristic Leaching Procedure metals analysis did not test above hazardous levels. An area located within one of the partially demolished buildings contained stock-piled PCB capacitors. In this same area, two drums labeled "Hazardous Waste" contained broken capacitors. Analysis of residual material in one of those drums detected Aroclor 1242 at 2,800,000 parts per billion. One large building is covered with metal panels coated with Galbestos. One of the two additional samples collected from the numerous rubble piles outside the buildings tested positive for chrysotile asbestos (10-20%).

After reviewing the results of the July 15, 2014 sampling event, Illinois EPA referred this Site to the EPA Region 5 Superfund Program in August 2014, based primarily on the threat of a release from ACM.

On October 14, 2014 a removal site visit conduct by EPA found 9 suspected ACM debris piles on Site. The total volume of these piles was estimated at 169,500 cubic feet, or 6,278 cubic yards. In addition, EPA also observed the chrome powder identified during Illinois EPA's sampling event as well as the PCB-containing capacitors and drums. It was noted that the drums containing the broken PCB-containing capacitors were deteriorating to the point that the drums posed a threat of immediate release. In addition, several bags of chrome dioxide powder were observed broken open on the ground and potentially available to be tracked through by trespassers or spread by wind.

Based on historical operations as well as investigations by Illinois EPA at the Site, contaminants of concern include asbestos, PCBs and chrome dioxide.

Although perimeter fencing exists, trees have grown up next to the fence enabling trespassers to climb the trees to get over the fence. Several of the buildings have been demolished and those that remain are unsecured. Many have broken windows, unsecured doors, or missing walls. There are several trespassing signs around the Site that are covered in graffiti. Discussions with local representatives for the current property owner revealed that there have been multiple incidents with trespassing. During EPA's October 14, 2014 Site visit, representatives observed that someone had broken into a boarded up door along Jasper Street.

2. Physical location

The Site is located on 9 separate land parcels in Decatur, Macon County, Illinois (Figure 1). The Site's geographical coordinates are 40° 17' 54.64" north latitude and 90° 25' 39.54" west longitude. The Site occupies nine adjacent parcels covering approximately 30 acres, bounded by East Marietta Street to the north, North Jasper Street to the west, and Norfolk Southern rail lines to the south and east. A residential neighborhood is located immediately north of the Site, and some of the homes in that neighborhood are within 100 feet of the Site.

The weather at the Site is average for Illinois. However, the Decatur area historical tornado activity is above Illinois state average, and is 180% greater than the overall U.S. average (Source: http://www.city-data.com/city/Decatur-Illinois.html).

An Environmental Justice (EJ) analysis for the Site was conducted. Screening of the surrounding area used Region 5's EJ Screening Tool (which applies the interim version of the national EJ Strategic Enforcement Assessment Tool (EJSCREEN). Region 5 has reviewed environmental and demographic data for the area surrounding the Site at 1275 East Sangamon Street in Decatur, Illinois and determined there is a high potential for EJ concerns at this Site.

3. Site characteristics

The Site is abandoned and is currently owned the LLC. Limited removal actions have been taken by the LLC under the State Remediation Program. However, EPA's current understanding is that the last of these actions was conducted four years ago.

No effective controls limit access to the building from trespassers. In addition, the condition of the 3 remaining buildings, including collapsed walls and missing windows and doors, allows the wind and other weather factors to mobilize contaminants. Based on the results of the removal site evaluation, friable asbestos from ACM in the buildings and nine of debris piles with ACM outside the buildings have the potential to migrate into the surrounding soils.

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

The Site presents a threatened future release and current ongoing release of hazardous substances. Many of the buildings that still exist have broken windows and missing walls, and contain suspected ACM. EPA has identified nine piles of suspected ACM debris located outside the buildings. Given the condition of the buildings and the debris piles of ACM at the Site, it is impossible to prevent the release of asbestos into the environment under current Site conditions.

Illinois EPA inspectors identified materials in the debris piles as friable asbestos. They also identified broken bags of chrome dioxide powder on the dirt floor in one of the buildings which is open to the environment.

In summary, the Site contains substantial quantities of friable asbestos, as well as PCBs and chrome dioxide at high concentrations. Asbestos, PCBs and chrome dioxide at the Site have the potential to be released into the environment. The Site has no secure fencing. There are gaps in the fencing and trees growing along the fencing which can easily be scaled. Many of the buildings are in a dilapidated condition, with broken windows, missing doors, and collapsed roofs and walls. The buildings are easily accessible to trespassers. Weather conditions can mobilize the asbestos, PCBs and chrome dioxide causing them to be released into the environment.

5. NPL status

The Site is not on the National Priority List (NPL), nor is it anticipated to be referred to the NPL site assessment program.

6. Maps, pictures and other graphic representations

Figure 1 Site Location Map
Figure 2 Site Layout Map
Attachment 1 Environmental Justice Analysis
Attachment 2 Detailed Cleanup Contractor Cost Estimate
Attachment 3 Independent Government Cost Estimate
Attachment 4 Administrative Record

B. Other Actions to Date

1. Previous actions

No significant response actions have been taken at the Site by local or state authorities.

2. Current actions

No current response actions by the owner, the operator, the State or local authorities are underway at the Site. The Site was previously under the Illinois EPA Site Remediation Program. However, Illinois EPA sent the owner an Intent to Terminate letter at the end of October, 2014, and a termination letter was sent out February, 2015. Beginning in December 2014 and continuing into 2015, EPA has sent the LLC a series of letters in an effort to begin a discussion about future response actions. To date, the LLC has not responded to EPA.

C. State and Local Authorities' Roles

1. State and local actions to date

The Site had been in Illinois EPA's voluntary site remediation program, but no cleanup work was conducted since 2011. Using Brownfield's Assessment grant money, the City of Decatur was able to conduct a Preliminary Phase I Environmental Site Assessment (ESA). Based on the Phase I ESA and at the request of the City of Decatur, Illinois EPA's Office of Site Evaluation conducted sampling of the Site on July 15, 2014. No other State or local response actions have been taken to address the hazardous substance releases at the Site. Illinois EPA referred the Site to EPA on August 28, 2014. As documented in a May 14, 2104 letter from the City of Decatur to Illinois EPA, and in the August 28, 2014 Illinois EPA Site referral to EPA, neither the City nor the State has the resources (personnel and/or monetary) to work on the Site at this time.

2. Potential for continued State/local response

Illinois EPA and the local government do not have the resources at this time to address the release of asbestos and other hazardous materials to the environment at the Site.

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

The conditions present 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 as provided for in the NCP, at 40 C.F.R. § 300.415(b). These criteria include, but are not limited to, the following:

Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants.

During the Site visit, EPA found significant volumes of suspected asbestos in nine debris piles. These piles are unsecured and exposed to the environment. Asbestos is a hazardous substance under 40 C.F.R. § 302.4 of the NCP. The Site is not adequately secured, and graffiti on buildings and signs at the Site indicates trespassers have accessed the Site.

Samples of friable materials collected by Illinois EPA from two of the nine suspected ACM debris piles showed one pile contained up to 10 to 20 percent chrysotile asbestos.

Chrysotile, as well as other forms of asbestos, is considered to be a human carcinogen by EPA's Integrated Risk Information System (IRIS), the Department of Health and Human Services (DHHS) and the International Agency for Research on Cancer (IARC). Asbestos is the name given to a number of naturally occurring fibrous minerals with high tensile strength, the ability to be woven, and resistance to heat and most chemicals. Because of these properties, asbestos fibers have been used in a wide range of manufactured goods, including roofing shingles, ceiling and floor tiles, paper and cement products, textiles, coatings, and friction products such as automobile clutch, brake, and transmission parts. Exposure to airborne friable asbestos may result in a potential health risk because persons breathing the air may breathe in the asbestos fibers. Chronic inhalation exposure to excessive levels of asbestos fibers suspended in air can result in lung disease such as asbestosis, mesothelioma, and lung cancer. Sub-acute exposures as short as a few days have been shown to cause mesothelioma. According to ATSDR, asbestos mainly affects the lungs and the membrane that surrounds the lungs. Breathing high levels of asbestos fibers for a long time may result in scar-like tissue in the lungs and in the pleural membrane (lining) that surrounds the lung. This disease is called asbestosis and is usually found in workers exposed to asbestos, but not in the general public. People with asbestosis experience difficulty breathing, often a cough, and, in severe cases, heart enlargement. Asbestosis is a serious disease and can eventually lead to disability and death. ATSDR also indicates that breathing lower levels of asbestos may result in changes called plaques in the pleural membranes. Pleural plaques can occur in workers and sometimes in people living in areas with high environmental levels of asbestos. Effects on breathing from pleural plaques alone are not usually serious, but higher exposure can lead to a thickening of the pleural membrane that may restrict breathing.

During the Site visit, EPA also observed intact and broken PCB-containing capacitors. Samples collected from one of the broken PCB capacitors detected Aroclor 1242 at 2,800,000 parts per billion. PCB are a hazardous substance, as that term is defined by Section 101(14) of CERCLA.

PCB are also listed as a hazardous substance under Section 311(b)(2) of the Clean Water Act, as set forth in 40 C.F.R. § 116.4 Table A.

The most commonly observed health effects in people exposed to large amounts of PCBs are skin conditions such as acne and rashes. Studies in exposed workers have shown changes in blood and urine that may indicate liver damage. Few studies of workers indicate that PCBs were associated with certain kinds of cancer in humans, such as cancer of the liver and biliary tract. Rats that ate food containing high levels of PCBs for two years developed liver cancer. DHHS has concluded that PCBs may reasonably be anticipated to be carcinogens. The EPA and IARC have determined that PCBs are probably carcinogenic to humans (ATSDR, February 2001).

Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released.

The visit to the Site identified nine piles of ACM released into the environment, and found nothing to prevent asbestos from migrating off-site. Drums containing broken PCB capacitors are stored in a building that is open to the elements. The base of one of the capacitor-containing drums showed severe corrosion. The chrome dioxide powder was found spilling out of bags that were on a dirt floor in another building that is open to the elements. Nothing currently prevents the chrome dioxide from being released into the environment.

The weather at the Site is average for Illinois. However, the Decatur area historical tornado activity is above the Illinois state average, and is 180% greater than the overall U.S. average (Source: http://www.city-data.com/city/Decatur-Illinois.html). Severe weather may impact the Site. Normal weather conditions, such as snow, rain and wind, will continue to be the main factors of hazardous substance release and migration at the Site. Migration will pose a real threat to nearby populations. As noted previously, a residential neighborhood is located immediately north of the Site, and some of the homes in that neighborhood are within 100 feet of the Site making them very susceptible to impacts from off-site migration.

Threat of fire or explosion.

The Site cannot be adequately secured from trespassers because of the dilapidated condition of the buildings, which includes missing walls, broken windows and doors, gaps in the perimeter fence, and overgrown trees next to the fence which can be used to scale over the fence. There is a reasonable threat of arson from vandals at the Site or homeless persons may inadvertently cause a fire. A fire at the Site could release asbestos, PCBs and chrome dioxide from the smoke plume into the surrounding residential community.

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

Based on information the May 14, 2104 letter from the City of Decatur to Illinois EPA, and the August 28, 2014 Illinois EPA Site referral to EPA, neither the City nor State have the funds or resources at this time to respond to a time-critical removal action of this magnitude required by conditions at the Site.

IV. ENDANGERMENT DETERMINATION

Given the Site conditions, 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 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.

V. EXEMPTION FROM STATUTORY LIMITS

Section 104 (c) of CERCLA, as amended by SARA limits the Federal emergency response to $2 million unless three criteria are met. The quantities and levels of hazardous substances at the Intermet/Wagner Castings Site warrant the $2 million exemption based on the following factors:

A) There is an immediate risk to public health or welfare or the environment;

The Site is located in a mixed industrial and residential neighborhood. Trespassing occurs at the Site on a regular basis, and breaks in the fencing around the Site facilitate trespass. During a Site walk through, the locals indicated that they frequently received calls of trespassers on the Site.

The Site is not adequately fenced and ACM has been documented in the debris piles on Site in the environment. The debris piles are not managed in any way by the property owner and the ACM is subject to deterioration and can be easily spread throughout the residential neighborhood by wind, rain and trespassers.

B) Continued response actions are immediately required to prevent, limit, or mitigate an emergency;

The continued presence of hazardous substances at the Site constitutes an imminent threat to human health, welfare, and the environment. The effects of wind and rain on the ACM constitute an ongoing threat that, if left unmitigated, could further impact the environment and surrounding residential neighborhoods.

C) Assistance will not otherwise be provided on a timely basis;

Based on information the May 14, 2104 letter from the City of Decatur to Illinois EPA, and the August 28, 2014 Illinois EPA Site referral to EPA, neither the City nor State have the funds or resources at this time to respond to a time-critical removal action of this magnitude required by conditions at the Site.

VI. 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 Site, which may pose an imminent and substantial endangerment to public health, or welfare, or the environment. Removal activities on Site will include:

1) Develop and implement a Site Health and Safety Plan to include a Perimeter Air Monitoring and Sampling Plan and develop measures to control ACM dust during the removal and deconstruction of the facility.

2) Develop a site specific sampling plan, to conduct additional characterization of the Site to determine the nature and extent of asbestos contamination in soil to support the removal action. The sampling plan will include the following: Target Compound List (TCL) analysis of PCBs to determine if Galbestos is leaching PCBs; TCL and Target Analyte List (TAL) analysis of metals to evaluate the area around the former plating shop to determine the adequacy of the cleanup of chrome dioxide powder; and analysis for VOCs and semivolatile organic compounds (SVOCs) to evaluate areas around former USTs and foundry areas.

3) Excavate any soil contaminated with asbestos, metals, PCBs, or VOCs/SVOCs (if found) in and around the Site that presents an unacceptable risk to public health and the environment.

4) As necessary, deconstruct buildings at the Site to excavate, recycle, load, transport, and dispose of readily identifiable ACM wastes, debris and underlying soil.

5) Transport and dispose of or recycle all characterized or identified hazardous substances, pollutants, wastes, or contaminants that pose a substantial threat of release at an EPA-approved disposal facilities in accordance with EPA's Off-Site Rule (40 C.F.R. § 300.440).

6) Post-confirmation sampling will be conducted in accordance with the site specific sampling plan to confirm the efficacy of the removal actions.

7) Backfill excavated areas with clean material and topsoil, as necessary. Restore excavated and disturbed areas and vegetate to prevent soil erosion.

8) Take any necessary response actions to address any Site related release or threatened release of a hazardous substance, pollutant, or contaminant that the EPA 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 OSC has initiated planning for provision of post-removal Site control consistent with the provisions of Section 300.415(l) of the NCP (40 C.F.R. § 300.415(l)).

The threats posed by the asbestos contaminated debris meet the criteria listed in Section 300.415(b) of the NCP (40 C.F.R. § 300.415(b)), and the response actions proposed herein are consistent with any long-term remedial actions which may be required. However, removal of hazardous substances, pollutants and contaminants that pose a substantial threat of release are expected to greatly minimize requirements for post-removal Site controls.

Off-Site Rule

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

2. Contribution to remedial performance:

The proposed action will not impede future actions based on available information. No long-term remedial actions have been identified for the Site.

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

Not Applicable.

4. Applicable or relevant and appropriate requirements (ARARs)

On January 08, 2015 EPA Region 5 sent a letter to Bruce Everetts with Illinois EPA requesting the State to identify ARARs for this time-critical removal action. Mr. Everetts responded in a letter dated January 09, 2015 that identified potential State ARARs.

Federal ARARs include the National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 61, Subparts A and M.

All Federal and State ARARs will be complied with to the extent practicable considering the exigencies of the circumstances.

5. Project Schedule

The removal activities are expected to take approximately 180 on-site working days to complete.

B. Estimated Costs

REMOVAL ACTION PROJECT CEILING ESTIMATE	
Extramural Costs:	
Regional Removal Allowance Costs:	
Total Cleanup Contractor Costs	$1,660,952
(This cost category includes estimates for ERRS, subcontractors, Notices to Proceed, and Interagency Agreements with Other Federal Agencies. Include a 20% contingency)	
Other Extramural Costs Not Funded from the Regional Allowance:	
Total START, including multiplier costs	$ 239,760
Total Decontamination, Analytical & Tech. Services (DATS)	$ 0
Total CLP	$ 0
Subtotal	$ 239,760
Subtotal Extramural Costs	$1,900,712
Extramural Costs Contingency (15% of Subtotal, Extramural Costs)	$ 285,107
TOTAL REMOVAL ACTION PROJECT CEILING	**$ 2,185,819**

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

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

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

VIII. OUTSTANDING POLICY ISSUES

In compliance with the *Framework for Investigating Asbestos-Contaminated Superfund Sites* (Framework), EPA implemented the following step-by-step approach outlined in the Framework to investigate and characterize the potential for human exposure from asbestos contamination at the Site.

Step 1 – Review historical and current data – EPA reviewed Site records where ACM was previously identified by Illinois EPA sampling investigations.

Step 2 – Has there been (or is there a threat of) a release to the environment? – Illinois EPA documented an actual release of ACM to the environment during their July 2014 sampling event. For sites where a release has not been documented, the Framework prescribes additional steps to further characterize potential exposure. However, where a release has been documented, the Framework allows for a response action without further characterization.

Based on the factors outlined above, the OSC recommends that a removal be performed to mitigate asbestos exposure, and exposure to other contaminants at the Site.

The removal involves a nationally significant and precedent-setting issue because the primary driving contaminant addressed by the removal is asbestos containing materials. In accordance with Re-delegation R-14-2, a request for concurrence on actions proposed in the memorandum was sought and obtained from the EPA Office of Emergency Management (OEM).

IX. ENFORCEMENT

For administrative purposes, information concerning the enforcement strategy for this Site is contained in the Confidential Enforcement 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 $ 4,228,148. [1]

$$(\$2,185,819 + \$200,000) + (77.22\% \times \$2,385,819) = \$4,228,148$$

[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-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.

X. RECOMMENDATION

This decision document represents the selected removal action for the Intermet/Wagner Castings Site, Decatur, Macon County, Illinois, 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 3). Conditions at the Site meet the NCP criteria at 40 C.F.R. § 300.415(b) for a removal. I recommend your approval of the removal action proposed in this Action Memorandum.

The total project ceiling if approved will be $2,185,819, of which an estimated $1,946,059 may be used for cleanup contractor costs. You may indicate your approval by signing below.

Approve: _____ 4/20/2016
for Director, Superfund Division Date

Disapprove: _____ _____
Director, Superfund Division Date

Enforcement Addendum

Figure 1 Site Location Map
Figure 2 Site Aerial Location Map
Photo 1 Photograph near Main Entrance of Site with overgrown vegetation
Photo 2 Photograph of West Side of Site showing broken windows and open door
Photo 3 Photograph along Jasper Street showing broken door (close up)
Photo 4 Photograph along Jasper Street showing broken door
Photo 5 Photograph of PCB capacitors in partially demolished building
Photo 6 Photograph of drummed broken PCB capacitors in partially demolished building
Photo 7 Photograph of base of a drum containing PCB capacitors
Photo 8 Photograph of chrome dioxide powder in partially demolished building
Photo 9 Photograph of graffiti on one of the buildings

Attachments:

1. Environmental Justice Analysis
2. Detailed Cleanup Contractor Cost Estimate
3. Independent Government Cost Estimate
4. Administrative Record Index

cc: B. Schlieger, U.S. EPA 5104A (email: schlieger.brian@epa.gov)
L. Nelson, U.S. Department of Interior, **w/o Enf. Attachment**
(email: Lindy_Nelson@ios.doi.gov)
B. Everetts, Illinois EPA, **w/o Enf. Addendum**
(email: bruce.everetts@illinois.gov)

BCC PAGE HAS BEEN REDACTED

NOT RELEVANT TO SELECTION

OF REMOVAL ACTION

<u>ENFORCEMENT ADDENDUM</u>

HAS BEEN REDACTED – FIVE PAGES

ENFORCEMENT CONFIDENTIAL

NOT SUBJECT TO DISCOVERY

FOIA EXEMPT

NOT RELEVANT TO SELECTION

OF REMOVAL ACTION

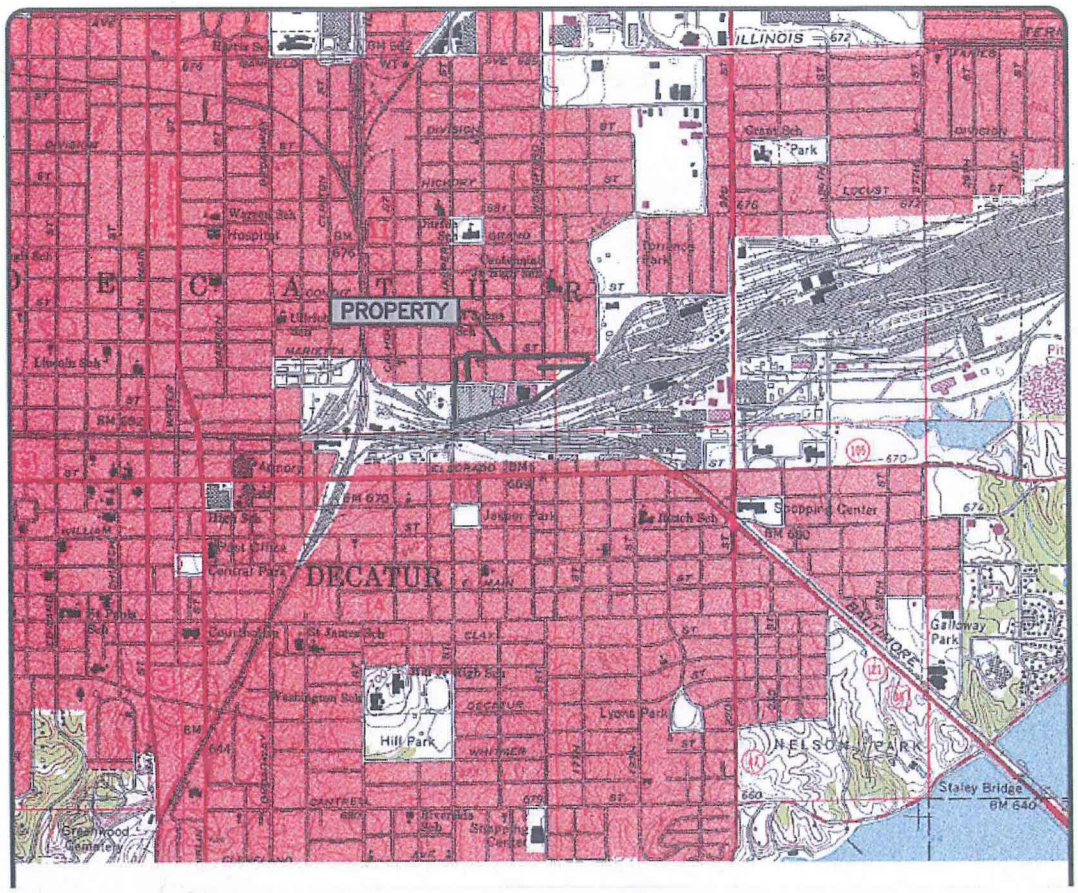


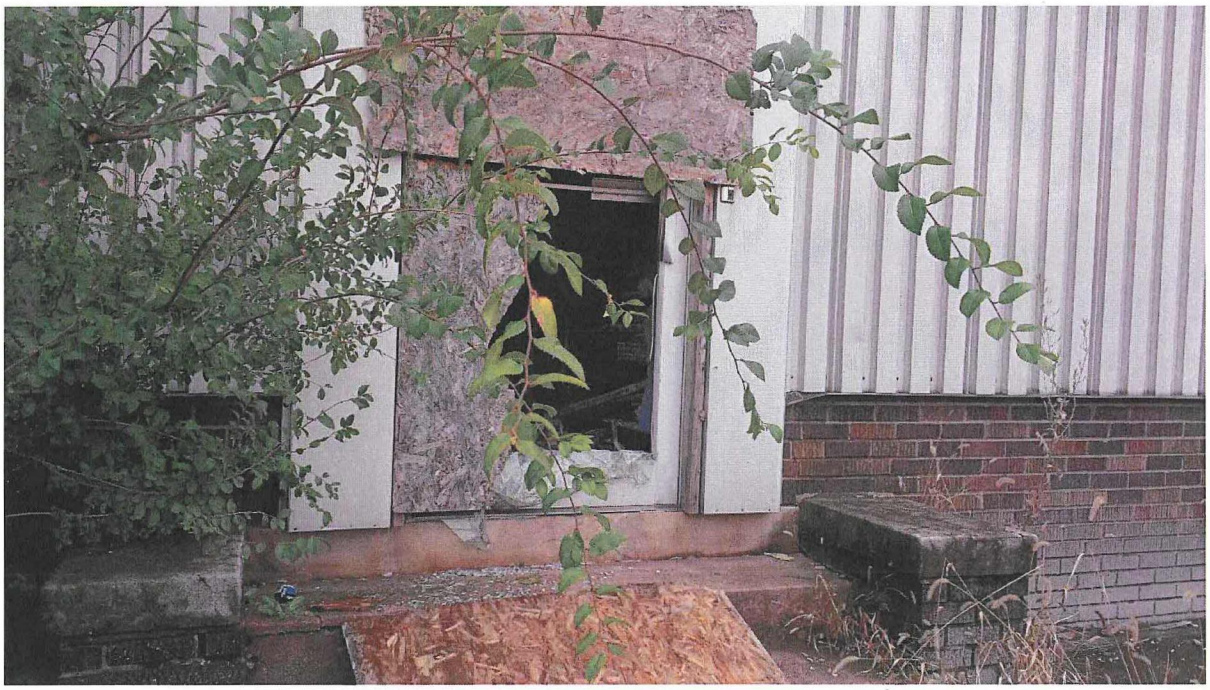
Figure 1
Site Location Map

Figure 2
Site Aerial Location Map

Photograph 1
Photograph Near Main Entrance of Site
Note Perimeter Fence Overgrown with Vegetation

Photograph 2
Photograph of West Side of Site along Jasper Street
Showing broken windows and an open door

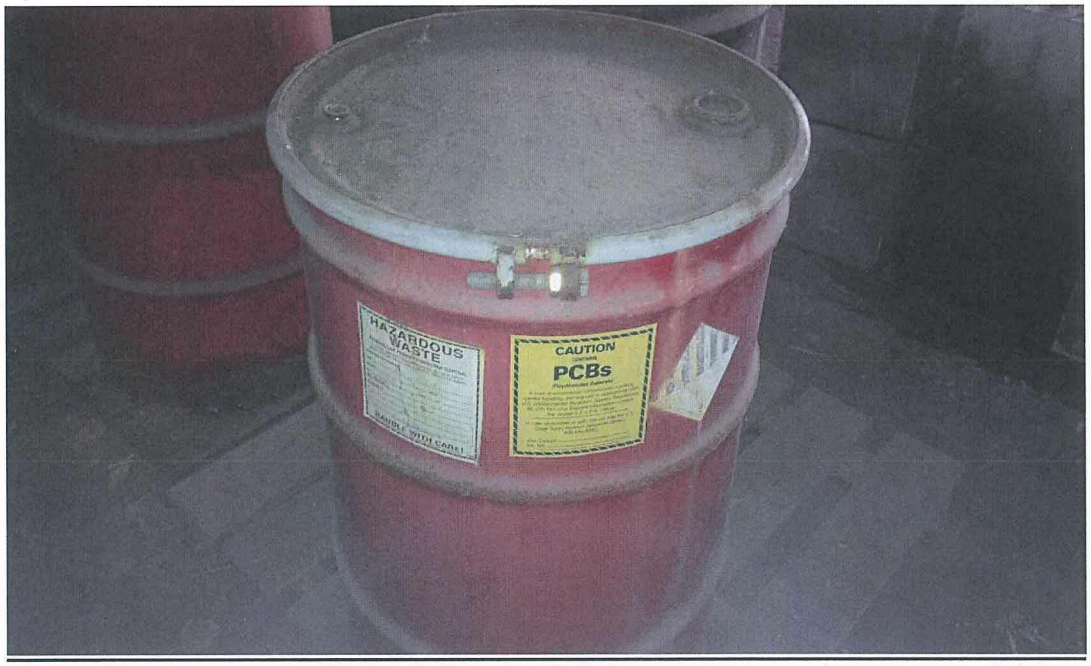
Photograph 3
Photograph along Jasper Street
Showing broken door, allowing access to the interior of one of the buildings



Photograph 4
Another Photograph along Jasper Street Showing Same
broken door as Photo 3, allowing access to the interior of one of the buildings

Photograph 5
Photograph of PCB capacitors in partially demolished building

Photograph 6
Photograph of drummed broken PCB capacitors in partially demolished building



Photograph 7
Photograph of base of drum containing broken PCB capacitors in partially demolished building. Note rusty base of drum.

Photograph 8
Photograph of chrome dioxide powder in partially demolished building. Powder has spilled out of broken bags and is contact with dirt floor.

Photograph 9
Photograph of graffiti on one of the buildings. Several buildings have graffiti painted on them, showing signs of trespass.

ATTACHMENT 1

Environmental Justice Analysis
Intermet/Wagner Castings Site
Decatur, Illinois
December, 2014

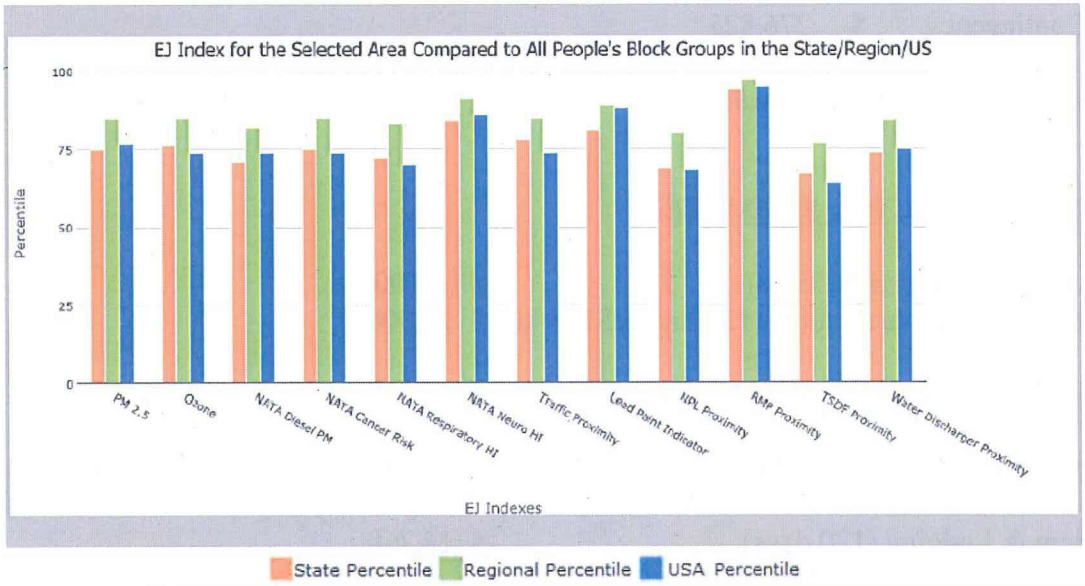
EJSCREEN Report

for 1 mile Ring around the Area, ILLINOIS, EPA Region 5

Approximate Population: 12147

Intermet Site

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
EJ Indexes			
EJ Index for PM2.5	75	85	77
EJ Index for Ozone	76	85	74
EJ Index for NATA Diesel PM	71	82	74
EJ Index for NATA Air Toxics Cancer Risk	75	85	74
EJ Index for NATA Respiratory Hazard Index	72	83	70
EJ Index for NATA Neurological Hazard Index	84	91	86
EJ Index for Traffic Proximity and Volume	78	85	74
EJ Index for Lead Paint Indicator	81	89	88
EJ Index for Proximity to NPL sites	69	80	68
EJ Index for Proximity to RMP sites	94	97	95
EJ Index for Proximity to TSDFs	67	77	64
EJ Index for Proximity to Major Direct Dischargers	74	84	75



This report shows environmental, demographic, and EJ indicator values. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 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.

ATTACHMENT 2

DETAILED CLEANUP CONTRACTOR ESTIMATE

HAS BEEN REDACTED – ONE PAGE

NOT RELEVANT TO SELECTION OF REMOVAL ACTION

ATTACHMENT 3

INDEPENDENT GOVERNMENT COST ESTIMATE

HAS BEEN REDACTED – TWO PAGES

NOT RELEVANT TO SELECTION

OF REMOVAL ACTION

ATTACHMENT 4

U.S. Environmental Protection Agency
Removal Action
Administrative Record
For Intermet/Wagner Casting Site
Decatur, Macon County, Illinois

Original
February 2015

No.	Date	Author	Recipient	Title/Description	Pages
1	8/24/14	Everetts. B Illinois EPA	Ribordy, M. U.S. EPA	Intermet/Wagner Castings referral (letter)	24
2	10/17/14	Thomas, C., U.S. EPA	Site file	Site Visit Trip Report	10
3	1/09/15	Everetts, B. Illinois EPA	Thomas, C., U.S. EPA	Intermet/ Wagner Castings Identification of State ARARs (letter)	3
4	2/06/15	Thomas, C., U.S. EPA	Karl, R., U.S. EPA	Action Memorandum: Request for Approval and Funding for a Time-Critical Removal Action at Intermet/ Wagner Casting Site	32