



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

**SUBJECT:** Request for Funding, 12-Month and \$2 Million Exemptions for a Removal Action at the Exide Technologies Site, Laureldale, Pennsylvania

**FROM:** Todd Richardson, On-Scene Coordinator  
Western Response Section (3SD32)

**THRU:** Fran Burns, Chief  
Western Response Section (3SD32)

**THRU:** Mike Towle, Chief  
Preparedness and Response Branch (3SD30)

**TO:** Linda Dietz, Acting Director  
Superfund and Emergency Management Division (3SD00)

**I. PURPOSE**

The purpose of this Action Memorandum is to request and document approval of a time-critical Removal Action for the Exide Technologies Site (Site) (EPA site ID No. B3AF), located at 3000 Montrose Avenue, Laureldale, Berks County, Pennsylvania. The Site consists of an approximately 40-acre former lead battery recycling and manufacturing facility (Facility) and the surrounding area where hazardous substances have come to be located. Removal Site Evaluation activities were performed on January 12, 2021, in accordance with the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 C.F.R. Part 300. The Removal Site Evaluation documented a threat to public health or welfare or the environment due to large quantities of hazardous substances, pollutants, and contaminants still remaining at the Site in emissions control system components, including baghouses and associated ducting, as well as other battery recycling and manufacturing structures and equipment, including smelting operations buildings and furnaces. Previous investigations by EPA's Resource Conservation and Recovery Act (RCRA) Corrective Action Program have also identified lead contamination in surface water and groundwater as well. Contaminated surface and groundwater are currently being treated by an on-Site wastewater treatment system (WWTS) and a storm water treatment system (SWTS). Operations of these systems are essential in the prevention of migration of contaminants from the Site.

Lead contamination has also been documented in drainage ditches and in an unnamed tributary on the Site. There are also waste management units on the Site, which have historically received operations and wastewater treatment-derived wastes. Based upon information obtained from the Removal Site Evaluation and a review of that information by the On-Scene Coordinator (OSC), a Removal Action is necessary to mitigate threats posed by the release and/or substantial threat of release of hazardous substances from the Site and to protect public health, welfare, and/or the environment.

To mitigate the threat, Comprehensive Environmental Response, Compensation and Liability Act of 1980, as amended (CERCLA), 42 U.S.C. §§ 9601, et seq., funding in the amount of \$5,950,698 is requested of which \$4,700,000 is from the Regional Allowance. Due to information obtained during the Removal Site Evaluation and the volume of hazardous substances, pollutants, and contaminants remaining on-Site, an extension to the 12-Month Statutory Limit and exemption from the \$2 Million Statutory Limit is also being requested.

## **II. SITE DESCRIPTION AND BACKGROUND**

### **A. Site Description**

#### **1. Site Background**

The Site is located partially in Muhlenberg Township and partially in the Borough of Laureldale, approximately 0.75 mile north of the City of Reading, in Berks County, Pennsylvania. The Site is approximately 40 acres. A layout of the Site is provided in Figure 1 (Attachment A).

The Facility began operating as a battery manufacturing plant in the mid-1930s under the ownership of the Bowers Battery Company. The General Battery Corporation purchased the Facility in 1958, continuing battery manufacturing operations until it was acquired by Exide Technologies (Exide) in 1987. For many years, Exide operated a lead smelter and recycled lead batteries at the Facility. Spent lead-acid batteries were sent to a battery breaker unit on-Site where lead, plastic, and acid were separated. Recycled lead was smelted and cast into lead-alloy bars to produce new battery plates. Exide discontinued battery manufacturing operations in 2010. In 2013, Exide ceased all lead recycling operations and removed hazardous waste materials from the Facility. In 2016, Exide began the formal closure of Hazardous Waste Management Units (HWMU) pursuant to Exide's Hazardous Waste Permit and Pennsylvania Department of Environmental Protection (PADEP) oversight.

On May 19, 2020, Exide filed for protection from its creditors pursuant to Chapter 11 of the U.S. Bankruptcy Code, 11 U.S.C. §§1101, et seq. Prior to Exide's bankruptcy filing, since 2013, the Facility was used solely for recycling of non-hazardous plastic materials. On November 17, 2020, the Exide Environmental Response Trust (Trust) acquired the Facility (and additional parcels) from Exide pursuant to a quitclaim deed executed by order of the bankruptcy court. As a result of a settlement agreement entered into by DOJ (Bankruptcy Settlement), on behalf of EPA, in connection with Exide's bankruptcy filing, the Trust was funded with monies (Trust monies) to address known environmental issues associated with the Facility and the surrounding areas. At

present, Trust monies are estimated to total less than \$2,500,000. Based on estimates provided by the Trust's contractor, Advanced Geo Services, cleanup costs to address remaining environmental issues at the Facility range between \$15,000,000 and \$20,000,000.

## 2. Removal Site Evaluation

Due to the Trust's lack of sufficient funding, and at the request of PADEP, EPA's Office of Preparedness and Response conducted a Removal Site Evaluation and has concluded that there are currently environmental concerns at the Site which pose a significant potential threat to human health and the environment, warranting a time-critical Removal Action.

During the Removal Site Evaluation several baghouses and associated rooftop ducting and screw conveyors were determined to pose a significant environmental threat to human health and the environment due to issues related to structural integrity. These structures include the Flex Kleen, Refinery, American Air Dust Collector, Reese, UOP, Carborundum, and #2 Ventilation Baghouses. Other Facility operations structures and equipment will be further assessed during this action to determine the need for inclusion in a subsequent removal action.

Table 1 below indicates the x-ray fluorescence (XRF) readings for lead collected during the Removal Site Evaluation:

**TABLE 1**

Exide Technologies XRF Screening Results from January 12, 2021

eV – electron Volts

ppm – parts per million

% - ie: 10% = 100,000 PPM, 5% = 50,000ppm, etc.

Run No.	Result for Lead	Comments
1	145eV	Calibration check; passed
2	>10%	Vent Baghouse #2 (inside filter)
5	>10%	Vent Baghouse #2 (inside filter)
7	>10%	Reese Dust Collector (inside filter)
8	>10%	FlexKleen Baghouse (inside hopper)
9	2.20%	Material on ground surface outside Reese Dust Collector
10	8.19%	Emissions material inside deteriorated duct in the Carborundum Baghouse
11	1.03%	Dust on paved ground surface outside smelter building
12	5.54%	Dusts on outside of furnaces in smelter building
13	5.17%	Dusts on outside of furnaces in smelter building
14	2.77%	Material on ground surface outside FlexKleen Baghouse
16	1,111 ppm	Dry drainage ditch surface soil
17	1,458 ppm	Dry drainage ditch surface soil

Other areas of concern identified during the Removal Site Evaluation and described in the RCRA Corrective Action Program Statement of Basis include the following waste management units:

- The Convent Landfill, which operated from 1977 -1979, received wastewater treatment (WWT) sludge, emissions control sludge, battery casings, blast furnace slag and has an 18" stabilizer liner and a 2' vegetated clay/soil cap.
- The Reading Landfill, operated from either the late 1930s or early 1940s to 1980, received WWT sludge, emissions control sludge, battery casings, and blast furnace slag. It is currently covered by a part asphalt, part vegetated clay/soil cap.
- The Battery Casing Disposal Area was an area where battery casings were placed in low lying areas in the floodplain of Bernhart Creek in the 1950s. This area was partially remediated during construction of the SWTS. Currently a driveway and parking lot cover this area, acting as a cap.
- The Lead Oxide Surface Impoundment #1 received emissions control sludge and blast furnace smelting operations sludge. The period of operations is unknown, but operations ceased in late the 1960s or early 1970s. Sludge was reportedly recycled through the smelter furnace, and leachate was treated by the WWTS.
- The Lead Oxide Surface Impoundment #2, located within the footprint of the WWTS, closed in the late 1960s or early 1970s. Remediation of this unit included sludge removal, and leachate was treated through the WWTS.
- The Groundwater Recovery Trench collected low pH shallow groundwater from a former acid storage tank area. Low pH water collected in this area was treated by the WWTS (pH levels are reported to be steadily approaching neutral).

Based on information provided to the EPA OSC from the EPA RCRA Corrective Action Program, Site reconnaissance, and data collected during the Removal Site Evaluation, the Removal Action will include evaluating options for optimizing and reducing operating costs of the WWTS and the SWTS, and addressing the smelter operation components, including baghouses and emissions control systems components.

### 3. Physical Location/Site Characteristics

This Site is located in Laureldale, Pennsylvania, approximately 0.75 mile north of the City of Reading. The Site is approximately 40 acres and is surrounded by residential areas, Bernhart Park to the southeast, and a convent and a cemetery to the west.

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

Significant quantities of lead-containing emission dust, with concentrations exceeding 10% lead, have been identified in smelter-related baghouses and emissions control components at the Facility. Several of these structures, as mentioned in Section II. A. 2., have structural integrity issues. In some cases, components of the structures have visible rusted or deteriorated areas

where smelter emission dust has released onto the ground. The dust on the ground surface poses a significant threat of migration via surface water to drainage ditches, to the surrounding community and/or to the SWTS. In addition, if left unaddressed, these deteriorating structures pose a significant risk of collapse, which could lead to a catastrophic release and deposition of high lead concentration dust at the Facility and to the surrounding community. All of these conditions increase the threat of a release that would be harmful to the health and welfare of the nearby residents, workers, and the surrounding Laureldale community.

## 5. National Priorities List

The Site is not on the National Priorities List (NPL).

### **B. Other Actions to Date**

The following summarizes actions to date.

#### 1. Previous actions

Under the oversight of PADEP and EPA's RCRA Corrective Action Program, Exide has investigated and/or remediated several impacted areas on and outside the Facility. On the Facility property, Exide has conducted investigations of the groundwater, surface water, sediment, as well as surface and subsurface soils, including the railroad right-of-way drainage ditches and an unnamed tributary. In addition, several on-Site waste management units have been capped in place and closed. More detailed information regarding previous investigation and response actions at and near the Facility can be found in the Exide Technologies Statement of Basis, EPA, May 2020, or at <https://www.epa.gov/hwcorrectiveactionsites/hazardous-waste-cleanup-exide-technologies-reading-pennsylvania>.

In August 2000, EPA and Exide entered an Administrative Order on Consent (AOC) under RCRA § 7003, 42 U.S.C. Section § 6973, requiring Exide to investigate the extent of lead contamination in the soil at properties located in vicinity of the Facility and to cleanup all such properties that were adversely affected by lead contamination and posing an unacceptable risk to human health and the environment. The properties in the vicinity of the Facility include the Bernhart Park, a convent property, the Gethsemane Cemetery, developed and undeveloped residential areas, and a campground property. Previous investigations and actions have been documented in the Exide Technologies Statement of Basis, EPA, May 2020.

#### 2. Current actions

Pursuant to the Bankruptcy Settlement, Exide is no longer required to satisfy its corrective action obligations. Rather, the Trust is collaborating with EPA and PADEP to use the limited Trust monies to address conditions at the Site. Advanced GeoServices, a private company contracted by the Trust to provide environmental consultation and general Site management, is currently on-Site providing Site security of the Facility and conducting operations and maintenance of the WWTS and SWTS. In addition, the Trust is evaluating leachate from the Facility's Reading and Convent Landfills to determine the need for the continued treatment through the WWTS.

Authorization and funding for Advanced GeoServices to continue efforts is being provided by the Trust. The Trust is currently funded at under \$2,500,000, while the necessary cleanup actions at the Facility are estimated to range between \$15,000,000 and \$20,000,000. Independent estimates obtained by Advanced GeoServices, for the demolition and decontamination the high priority baghouses (those having structural integrity issues), not including transportation and disposal of wastes, range between \$750,000 and \$2,100,000.

### **C. State and Local Authorities' Roles**

On November 25, 2020, PADEP requested EPA Superfund assistance in responding to conditions at the Site. The OSC will continue to coordinate with PADEP and local authorities.

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

Section 300.415 of the NCP, 40 C.F.R. § 300.415, lists the factors to be considered in determining the appropriateness of a Removal Action. Paragraphs (b)(2)(i), (iii), (v), (vi) and (vii) of Section 300.415 directly apply to the conditions at the Site.

### **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”**

The hazardous substances present at the Site include various metals such as antimony, arsenic, cadmium, mercury, and lead. Lead is the predominant contaminant at the Site. Residential homes are located adjacent to the Facility with several neighborhoods within several hundred feet. Drainage ditches and an unnamed tributary to Bernhart Creek run through the Site. Drainage ditches at the Site contain documented lead concentrations in soil up to 35,600 milligrams per kilogram (mg/kg). Sediment in tributaries has been documented with up to 11,300 mg/kg of lead.

Release of hazardous substances to the environment would cause harm to adjacent communities and to Bernhart Creek by ingestion and inhalation of lead dust.

### **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”**

Based on knowledge of previous Site operations and from information obtained from the Removal Site Evaluation, lead-contaminated dust and other residual material are still present at the Site within smelter-related process equipment and associated air emissions systems, including various baghouses, duct work, and conveyors. Dust material in three separate baghouses was screened during the Removal Site Evaluation and found to contain lead at concentrations greater than 10% lead. These baghouses are in varying states of disrepair and not currently being maintained. Further degradation of these baghouses, such as failing support

structures and openings in the dust containment, may lead to additional release of hazardous substances to the environment.

**300.415 (b) (2) (iv) “High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface, that may migrate”**

Drainage ditches at the Site contain documented lead concentrations in soil up to 35,600 mg/kg. A railroad bed located at the Site contains lead concentrations in soil up to 14,900 mg/kg. Greatest concentrations were documented in the top six inches of soil. Surface soil contamination is currently suspected of causing impacts to on-Site drainage ditches and an unnamed tributary to Bernhart Creek and may be causing additional dust dispersion to surrounding areas. While this action will focus on the structures and limit additional releases to soil, as described in Section II. A. 2., surface soil associated with the railroad bed, drainage ditches, and other impacted areas on the Site will be further assessed as part of this action, for possible inclusion in future removal actions.

**300.415 (b) (2) (v) “Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released”**

Many of the baghouses and associated equipment/structures are in poor condition and not currently being maintained. Dust from these deteriorated structures was screened with lead concentrations ranging from 2% to greater than 10%. Further weathering and degradation of these structures may cause a release of additional hazardous substances to the environment and the surrounding neighborhoods. While this action will focus on the structures and limit additional releases to soil, as described above in Section II. A. 2., other baghouses, associated equipment/structures will be further assessed as part of this action, for possible inclusion in future removal actions.

**300.415 (b) (2) (vii) “The availability of other appropriate federal or state response mechanisms to respond to the release”**

EPA continues to coordinate with the Trust and PADEP personnel. The Trust established through the bankruptcy by Exide, has limited funding available for response actions at the Site and Trust monies are insufficient to complete the necessary activities. PADEP requested assistance with the Site from the EPA Removal Program on November 25, 2020.

#### **IV. EXEMPTION FROM STATUTORY LIMITS**

Based upon information obtained by EPA as a result of the Removal Site Evaluation, as described above, an exemption from the 12-month and \$2 million limit for a response action is requested to fully implement the proposed actions described below to mitigate the immediate threats to public health, welfare, and the environment. Pursuant to EPA Delegation 14-2 Section 2.d. (dated 4/15/19), the Regional Administrator may delegate the authority to select CERCLA removal response actions that meet the requirements of an emergency waiver as set forth in

CERCLA § 104(c)(1)(A), 42 U.S.C. § 9604(c)(1)(A), and which cost up to \$6 million and/or lasting longer than 12 months to the Director, Superfund and Emergency Management Division.

Conditions at the Site meet the requirements of the emergency exemption as described below.

- (i) *Continued response actions are immediately required to prevent, limit, or mitigate an emergency:*

The baghouses and associated ducts on-Site contain hazardous substances and are in deteriorating condition. Contents of several of these structures were observed on the ground surface during the Removal Site Evaluation. Currently, high concentrations of lead are present in structures, drainage ditches throughout the Facility, as well as in areas surrounding the Facility. In addition, the Facility has a WWTS and SWTS, which are currently operated by the Trust. Disruption to these operations would result in a catastrophic release of high levels of hazardous substances.

- (ii) *There is an immediate risk to public health, welfare, or the environment:*

As a result of 35 years of lead smelter operations prior to the installation of air pollution controls and the advent of the Clean Air Act of 1970, Exide contributed to lead emissions and releases that impacted the soils in the surrounding community and the conditions at the Site. Historical contamination both on the Facility and surrounding areas has been attributed to air deposition of lead from former smelter operations. Further structural deterioration or a catastrophic release of hazardous substances associated with baghouses, ducts, and associated equipment on-Site may contribute to a release that would be harmful to the health and welfare of the nearby residents and workers in the surrounding businesses.

- (iii) *Such assistance will not otherwise be provided on a timely basis*

Sufficient resources are not available from potentially responsible parties, PADEP, local or other federal agencies.

This request satisfies the following exemption criteria as set forth in CERCLA § 104(c)(1)(A), 42 U.S.C. § 9604(c)(1)(A), and 40 C.F.R. § 300.415(b)(5)(i) of the NCP.

## **V. ENDANGERMENT DETERMINATION**

Based upon information gathered during the Removal Site Evaluation for the Site, as described above, the actual or threatened releases of hazardous substances from this Site may present an imminent and substantial endangerment to public health, welfare, or the environment.

Historically, air emissions from the Facility have resulted in widespread lead contamination of soils at the Site. Lead is present in dust in baghouses, ducting, and associated equipment



at concentrations greater than 10%. EPA observed during the Removal Site Evaluation that many of the baghouses and associated equipment are in poor condition. The poor condition of the baghouses and associated equipment pose a substantial threat of release of contaminated dust which could significantly contribute to lead contamination of soils at the Facility and to the surrounding areas.

## **VI. PROPOSED ACTIONS AND COSTS**

The proposed action is intended to mitigate the threat posed to the public health and welfare due to the threatened release of hazardous substances from the Site. EPA's actions will initially prioritize the hazardous substances remaining in baghouses and associated equipment posing the greatest threat to public health, welfare, and the environment. Certain factors of uncertainty exist for the Site. Currently, high concentrations of lead are present in structures, drainage ditches throughout the Facility, as well as in areas surrounding the Facility. In addition, the Trust is currently operating the WWTS and SWTS. Disruption to these operations would result in a catastrophic release of high levels of hazardous substances.

### **A. Proposed Actions**

#### **1. Description of Proposed Actions**

- a. Mobilize personnel and equipment to and from the Site, as necessary.
- b. Establish Command Post and support facilities.
- c. Address deteriorating baghouses, ducting, and other associated equipment at the Facility including:
  - i. Conduct actions necessary to facilitate access to work areas, safe work conditions, and removal of structures. Actions may include, but are not limited to, clearing vegetation/debris, removing structures which impede access, and further assessing structural integrity of buildings and structures.
  - ii. Dismantle and remove lead-contamination over 1000 ppm from structures.
  - iii. Conduct appropriate decontamination of structures.
  - iv. Remove and prepare for offsite disposal dismantled structures and other cleanup wastes containing lead contamination over 1000 ppm.
  - v. Dispose offsite dismantled structures and other cleanup wastes containing lead contamination over 1000 ppm in accordance with Section 121(d)(3) of CERCLA and 40 C.F.R. § 300.440.
- d. Conduct air monitoring in support of removal activities to protect residences near the Facility and on-Site workers.
- e. Coordinate with State and local government to implement post-removal site controls to protect the integrity of the removal actions.

Additional removal site evaluation will also be conducted, including the following:

Evaluate WWTS and SWTS including:

- i. Identify and evaluate long-term options for operation and maintenance.
- ii. Assess treatment needs for planned and potential Site cleanup activities.
- iii. Identify and evaluate options for optimizing and reducing operating costs of water treatment systems.
- iv. Collect samples to determine concentrations of contaminants and water quality of influent and effluent.

Further evaluate:

- v. Additional on-Site smelter-related structures, equipment, and exposed surfaces.
- vi. Soil and sediment associated with drainage ditches, an unnamed tributary, and Bernhart Creek and,
- vii. Waste management units.

## **2. Contribution to remedial performance**

The actions proposed will contribute to any future remedial actions that may be necessary at the Site.

## **3. Compliance with ARARs**

The proposed Removal Action will comply with Federal and State applicable or relevant and appropriate environmental regulations (ARARs) to the extent practicable considering the exigencies of the situation.

The OSC formally requested State ARARs from PADEP in an email dated February 5, 2021. On February 5, 2021, PADEP stated that they would be forwarding the applicable, relevant and appropriate regulations once they reviewed the action for the Site.

The OSC and PADEP will continue to identify and evaluate ARARs as Site work proceeds. All work will be completed in coordination with the State and local authorities.

## **B. Project Schedule**

Initiation of this Removal Action is estimated to be within 60 days of action memorandum approval. The proposed scope of work is expected to take more than 12 months to complete.

## **C. Estimated Costs**

As sampling and Site assessment proceed, a more thorough evaluation of the amount of hazardous substances and threats and pollutants and contaminants presented can be accomplished.

The proposed distribution of funding is as follows:

Extramural Costs	Ceiling
Regional Allowance Costs (This cost category includes estimates for ERRS contractors, subcontractors, letter contracts, orders for services, notices to proceed, alternative technology contracts, and inter-agency agreements with other Federal Agencies)	\$4,700,00
Other Extramural Costs Not Funded from the Regional Allowance (START Contractor, Total CLP)	\$850,698
Contingency	\$400,000
<b>TOTAL REMOVAL PROJECT CEILING</b>	<b>\$5,950,698</b>

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

If a removal action is not taken or is significantly delayed, the threatened release of hazardous substances into the environment (including the surrounding community) will continue and an actual release may occur. The Facility will continue to fall into further disrepair as the property owner is unable to mitigate or secure the Facility property further.

#### **VIII. OUTSTANDING POLICY ISSUES**

There are no outstanding policy issues related to the proposed Removal Action at this Site.

#### **IX. ENFORCEMENT**

See the attached Confidential Enforcement Addendum (Attachment B).

The total EPA costs for this Removal Action based upon full-cost accounting practices that will be eligible for cost recovery are estimated to be \$10,322,191.<sup>1</sup>

Direct Extramural Costs	\$5,950,698
Direct Intramural Costs	<u>\$ 160,000</u>
Total Direct Costs	\$6,110,698
Indirect Cost (68.92% x Direct Costs)	\$ 4,211,493
Total Costs (Direct and Indirect)	\$10,322,191

## **X. RECOMMENDATION**

This decision document represents the proposed Removal Action for the Exide Technologies Site, developed in accordance with CERCLA, as amended, and is not inconsistent with the NCP. Because conditions at the Site meet the criteria in Section 300.415(b) of the NCP for a removal action, I recommend your approval of the proposed Removal Action.

By signing this Action Memorandum, you are also hereby establishing the documents listed in Attachment C as the Administrative Record supporting the selection of the time-critical Removal Action identified in this document pursuant to Section 113 (k) of CERCLA, 42 U.S.C § 9613 (k), and EPA Delegation 14-22.

The total Removal Action Project Ceiling, if approved, will be \$5,950,698. Of this, an estimated \$4,700,000 comes from the Regional Removal Allowance. Please indicate your approval or disapproval below.

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<sup>1</sup>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.

Action by the Approving Official:

I have reviewed the above-stated facts and based upon those facts and the information compiled in the documents described above, I hereby determine that the release or threatened release of hazardous substances at and/or from the Site presents or may present an imminent and substantial endangerment to the public health or welfare or to the environment. I concur with the recommended Removal Action as outlined.

APPROVED: \_\_\_\_\_

DATE: \_\_\_\_\_

Linda Dietz, Acting Director  
Superfund and Emergency Management Division

Attachments:

- A. Figure 1
- B. Confidential Enforcement Addendum
- C. Administrative Record Index