



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

MEMORANDUM

SUBJECT: Request for Approval and Funding and Exemption from the \$2 Million Statutory Limit for a Removal Action at the former U.S. Technology FS Site, Fort Smith, Sebastian County, Arkansas

FROM: David Robertson, On-Scene Coordinator
AR/LA/OK Section (6SEDEA)

THRU: Craig Carroll, Manager
Response and Removal Branch (6SEDE)

TO: John Meyer, Acting Director
Superfund and Emergency Management Division (6SED)

I. PURPOSE

The purpose of this Action Memorandum is to request and document approval of the selected removal action described herein in accordance with the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA"), 42 U.S.C. § 9604, for the former U.S. Technology Warehouse, 6500 Grand Ave., Fort Smith, Sebastian County, Arkansas. This time-critical removal action provides for the removal of the threat to human health and the environment posed by the identified contaminants of concern listed herein.

The proposed plan of action meets the criteria for initiating a removal action under Section 300.415 of the National Contingency Plan (NCP), 40 C.F.R. § 300.415. This action is expected to require less than twelve months to complete. The cost for this action is expected to be over \$2 million.

II. SITE CONDITIONS AND BACKGROUND

CERCLIS:	ARR000029025
Category of Removal:	Time Critical
Site ID:	A6VV
Latitude:	35.389722° North
Longitude:	94.355833° West

A. Site Description

1. Removal Site Evaluation

The Site is located next to the Arkansas River at 6500 Grand Ave, Fort Smith, Arkansas, and includes an approximately 33,000 square foot warehouse. U.S. Technology Corporation (UST) used the warehouse to store spent blast media (SBM) waste generated in customers' paint stripping and surface preparation operations. UST stopped receiving SBM in 2016. The facility is no longer active, and UST is no longer in operation. The warehouse currently contains an estimated 1.4 million pounds of SBM stored in approximately 4,000 open head 55-gallon drums.

SBM is a waste stream generated when plastic, glass, aluminum oxide, or other blast media is used to remove paint or prepare surfaces for coating. The SBM was generated off-site and shipped to this location by various third-party generators. The Site was previously the subject of an enforcement action by the Environmental Protection Agency (EPA) Region 6 Resource Conservation and Recovery Act (RCRA) program. The primary contaminants of concern at the Site are metals which are present in waste SBM. The SBM at this Site was previously tested by the Region 6 RCRA enforcement program and determined to exhibit hazardous waste characteristics for the toxic metals: cadmium, chromium, and lead. The RCRA enforcement action resulted in a settlement with ten RCRA generators pursuant to which approximately 4,840,802 pounds of the initial estimated 5.2 million pounds of SBM left by UST in the warehouse was removed for disposal.

As of the October 2022 Removal Site Assessment, one bay door of the warehouse has been damaged by vandalism and one bay door is partially open. The approximately 4,000 drums containing SBM and remaining in the warehouse are stacked five pallets high in the northwest corner of the warehouse. In addition, approximately 29 drums, some containing what appear to be open 5-gallon pails labelled "flammable Liquid" are stored in the southeast bay of the warehouse.

It is not known if UST or any other entity purposely disposed SBM on the grounds of the Site. However, a white powdery material similar in color to the SBM was observed on the ground northwest of the warehouse. The white material observed is less than 500 feet from the Arkansas River.

For the purposes of CERCLA, the "Site" includes the warehouse and surrounding 68 acres at 6500 Grand Ave, Fort Smith, Arkansas.

2. Physical Location

The Site is located at 6500 Grand Ave, Fort Smith, Arkansas. The Site geographic coordinates are Latitude 35.389722° North and Longitude 94.355833° West. According to a search of the Sebastian County Tax Assessor on-line records, the 68-acre Site is owned by UST Marine Property LLC (mailing address: 4200 Munson St. NW, Campton, OH 44718). Site maps are provided in Appendix 1.

The Site is immediately north of Sunnymeade Trail Park and south of Juan's Tree Service. The Site is bounded on the east by the Arkansas River and on the west by an empty field. Further to the west is a creek, then a light commercial retail shopping area which is adjacent to Interstate 540. The Site is located less than half a mile from a residential area (see Maps Appendix 1). EJ Screen indicates only one indices above 80%.

The Site includes a dirt/gravel road which circles the single warehouse (163' x 206'; approximately 33,578 sq. ft.). The areas outside the dirt road are covered with small trees, high grass and scrub. The warehouse has five bay doors with ramps, including one bay door damaged by vandalism and one partially open. Southeast of the Site exists a commercial dock which currently appears to be unused at a turning basin in the Arkansas River.

The Site is predominantly flat with a slight downward slope toward the Arkansas River. The Site is located within a FEMA Special Flood Hazard Area. In May 2019 the Arkansas River flooded, and the warehouse took in 18 inches of water (see Maps Appendix 1).

3. Site Characteristics and Background

UST provided virgin bead blast media to customers for use in cleaning, stripping paint, and maintaining equipment surfaces on aircraft, vehicles and equipment. Once used, the blast media becomes SBM containing a mixture of abrasives and material removed by the blast media, including toxic levels of metals (e.g., cadmium, chromium and lead). SBM was then shipped by the customers to warehouses throughout the country for processing and, according to UST, recycling. Instead of recycling the SBM, the SBM in the Site warehouse was stored by UST without a RCRA permit. UST and its President, Ray Williams, were indicted and entered guilty pleas in two criminal cases related to the operations of UST (United States District Courts for the Eastern District of Missouri and the Middle District of Georgia, with sentencing in both cases in January 2019). EPA previously conducted CERCLA removal actions at the Mississippi and Missouri facilities with UST-related SBM.

UST opened its Fort Smith, Arkansas, location in 2009 and began receiving SBM from customers and blending SBM in 2010. Waste SBM was received in drums or supersacks on pallets. The blending process began with sifting the material through a shaker to remove debris and other oversize material. After the removal of oversize pieces and undersize dust in the shaker, the SBM was then blended with SBM from other facilities. The blending operation included a cyclone which captured some of the fines from the process. The cyclone vented inside the warehouse, resulting in a fine layer of SBM dust covering everything in the warehouse.

UST reportedly shipped some of the blended SBM from the Arkansas warehouse off-site to Midwest Block in Arkansas or Ruby Concrete in Kentucky for use in the manufacture of concrete blocks. Midwest Block and Ruby Concrete ceased taking this material in 2016. Other than the waste disposed pursuant to the RCRA settlement, no waste has been received or shipped from this warehouse since 2016. Approximately 4,000 drums of SBM remain on-site.

The EPA Region 6 RCRA Enforcement Division developed information about Site operations and waste left on-site during its investigation. Reports generated by the EPA RCRA enforcement program are provided in Appendix 2 to the Action Memorandum. The RCRA Removal Action Report is provided in Appendix 3. Site photos are in Appendix 4.

4. Release or Threatened Release into the Environment of a Hazardous Substance, or Pollutant or Contaminant

Analytical results from samples collected by the EPA RCRA Enforcement Division indicate CERCLA hazardous substances are present in the SBM waste materials at the Site. Cadmium, chromium, and lead are hazardous substances as defined in CERCLA section 101(14), 42 U.S.C. § 9601(14), and as designated in 40 C.F.R. § 302.4. TCLP test results confirm that the SBM waste is categorized as RCRA hazardous waste since it exceeds the maximum concentration for cadmium, chromium and lead listed in 40 C.F.R. § 261.24, Table 1. RCRA hazardous wastes are also defined as CERCLA hazardous substances pursuant to Section 101(14)(c) of CERCLA.

SBM waste containing cadmium, chromium and lead has the potential to be released from breached or overturned drums in the interior of the building to the exterior through open or damaged loading bay doors. Descriptions of the SBM in various reports indicate the material can form a fine dust that is easily spread (Appendices 2 and 3). In addition, the Site is subject to flooding by the Arkansas River, and a 2019 flood event resulted in flooding in the warehouse (an aerial photograph of the flooded Site is provided in Appendix 1). Releases may occur through trespassing and acts of vandalism, the condition of the drums, flooding, or other weather-related events. Some visual evidence also indicates potential past releases from the Site within 500 feet of the Arkansas River. These areas will be evaluated for actual releases.

5. National Priority List status

The Site is currently not listed on the National Priority List. A preliminary hazard ranking system calculation has not been conducted.

6. Maps, Pictures and Other Graphic Representations

See Appendix 1 (Site Maps) and Appendix 4 (Site Photos).

B. Other Actions to Date

1. Previous Actions

EPA Region 6 RCRA Enforcement conducted a sampling inspection at the Site on June 16-19, 2018 (Appendix 2). The RCRA enforcement action resulted in settlements with ten RCRA generators that sent SBM to the Site, as documented in the Consent Agreement and Final Order, Docket No. RCRA-06-2021-0931 thru 0940. Pursuant to the settlement, the ten RCRA generators removed 4,840,802 lbs of SBM for disposal, including 6,678 drums and 1,246 supersacks. The 4,000 drums remaining on-site were attributed by EPA Region 6 RCRA to the

Department of Defense and potentially other generators. The Removal Action Report, Appendix 3, indicated that many of the drums removed were in poor condition “likely due to floodwaters from the Arkansas River that had entered the building in prior years”. The report also noted that open drums exposed to water contained solidified or semi-solidified SBM that was difficult to remove from the drums. The report further noted that dust from the drum emptying process was extremely difficult to control and to meet OSHA personal protective standards for workers; workers had to switch from P100 respirators to powered air purifying respirators in order to meet the cadmium respiration standard for worker protection. For these reasons and others listed in Section VI. below, EPA is proposing to ship the drums as is after placing into lined roll-off boxes.

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

Conditions at the Site present a threat to public health and the environment and meet the criteria for initiating a removal action under 40 C.F.R. § 300.415(b) of the NCP. Section 300.415 of the NCP lists the factors to be considered in determining the appropriateness of a removal action, and any one of these factors may be sufficient to determine whether a removal action is appropriate.

EPA has considered all of the factors described in 40 C.F.R. § 300.415(b) of the NCP and determined that the following factors apply 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.

Cadmium, chromium, and lead are listed CERCLA hazardous substances under 40 C.F.R. § 302, Table 302.4. Large quantities (approximately 1.4 million lbs.) of hazardous waste containing cadmium, chromium and lead at the Site pose a significant threat to public health and the environment. The Site is not manned by any personnel, and trespassers can enter the warehouse through the vandalized bay door and another, partially open bay door. Potential human exposure to the hazardous substances could result, with the primary exposure pathway being inhalation of airborne dust or ingestion of the toxic metals through direct contact by trespassers entering the Site, or workers if the warehouse is reused in the future.

The Site is located within a FEMA Special Flood Hazard Area. Future significant flooding could wash loose SBM materials from the building into the surrounding area, and subsequently could create airborne dust that would pose an inhalation or ingestion hazard. Exposure to cadmium, chromium and/or lead can cause kidney and lung damage and has been associated with increased risk of respiratory system cancers [ATSDR 2000]. The toxicity of lead to humans has been known for over 2,000 years and is not disputed. Toxic effects of lead have been observed in every organ system that has been rigorously studied [ATSDR 2020]. Further, if a flood occurred, floodwaters likely contaminated with cadmium, chromium and lead would enter the adjacent Arkansas River and its surrounding riparian wetlands. Acute ambient water quality criteria, or AWQC, for freshwater organisms exposed to cadmium is 2.0 µg/L, which is well below the

maximum TCLP value of 167,000 µg/L collected by RCRA enforcement at S75 from a supersack which is no longer on-site, however, the samples collected by RCRA enforcement were intended to represent the waste stream as a whole and can be considered representative of the remaining waste (see EPA RCRA Enforcement sample results in Appendix 2). The acute AWQC for lead is 65 µg/L and the maximum TCLP lead sample collected by RCRA enforcement at drum SD31 was 7,170 µg/L and since this sample was collected from a drum it has the potential to remain on-site.

EPA has not yet measured cadmium, chromium, or lead levels outside of the warehouse. However, there is visual evidence that suggests potential spillage or past releases in the form of a white powder observed on the ground immediately northwest of the facility. This visually white-stained area is within 500 feet of the Arkansas River.

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

EPA personnel documented the presence of approximately 4,000 55-gallon drums containing hazardous waste exhibiting the characteristic of toxicity for cadmium, chromium, and lead at the Site. During the October 2022, Removal Site Assessment, EPA personnel observed that the hazardous waste stored in stacked drums had the potential to spill onto the building floor and be released outside of the building through overhead doors and other exit points around the building. The warehouse is abandoned without electricity or any climate control, and the condition of the drums can be expected to further deteriorate over time. Once outside of the building, waste materials exposed to elements such as rain, wind, and flooding events will continue to migrate from the Site into the environment. Any surface runoff from the Site will reach the adjacent Arkansas River which is approximately 300 feet east of the warehouse containing SBM.

The Arkansas River is an active recreational waterway and is used by locals for fishing and other recreational activities. Aquatic and terrestrial ecological receptors could be adversely affected by a significant toxic release of heavy metals from Site contaminants. Chromium toxicity to aquatic organisms is dependent on chromium speciation (trivalent is less toxic than hexavalent form), the developmental stage of the organism, and abiotic factors such as pH and temperature. Cadmium effects on aquatic biota in concentrations greater than 10 µg/L are associated with high mortality, reduced growth, and inhibited reproduction (Eisler, Ronald. 2000. "Handbook of Chemical Risk Assessment" vol. 1, Lewis Publishers, Boca Raton, FL). The toxicity of lead to humans has been known for over 2,000 years and is not disputed. Toxic effects of lead have been observed in every organ system that has been rigorously studied [ATSDR 2020].

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

As previously stated, the Site is located within a FEMA Special Flood Hazard Area, Zone AE. Zone AE are areas that have a 1% probability of flooding every year (also known as the "100-year floodplain"). Properties in Zone AE are at high risk of flooding under the National Flood Insurance Program. Area flash flooding could release waste materials from the building into the surrounding

area, or into the adjacent Arkansas River. The Arkansas River is known to have flooded the Site in 2019, resulting in river water entering the warehouse. A catastrophic or large-scale flood could cause damage to the storage building and cause rapid and significant transport of the waste into the environment.

Large quantities of hazardous waste containing cadmium, chromium, and lead at the Site pose a significant threat to the Arkansas River in the event of a large-scale flood. TCLP test results provided by RCRA enforcement confirm that the waste is categorized as hazardous waste as it exceeds the maximum concentration for cadmium, chromium and lead. The TCLP is a sample extraction method for chemical analysis employed as an analytical method to simulate leaching of a contaminant from a solid media. Failure of the test indicates that the material is likely to leach out a contaminant at an unacceptable concentration when exposed to rainwater or flood water. The leaching of cadmium, chromium or lead due to exposure to water will increase the likelihood that these contaminants will migrate into the Arkansas River surface waters/wetlands and soils and threaten downstream ecosystems.

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

There are no other known appropriate federal or state response mechanisms available to conduct an appropriate response at the Site. The State of Arkansas has referred this matter to the EPA for response.

IV. ENDANGERMENT DETERMINATION

The threatened release of hazardous substances at and from the Site, if not addressed by implementing the removal action selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, or welfare, or the environment.

V. EXEMPTION FROM STATUTORY LIMITS

A. Emergency Exemption to the \$2 million statutory limit

1. There is an immediate risk to public health or welfare or the environment.

There is an immediate risk to the public health via several pathways of exposure. Hazardous substances are stored in 4,000 steel drums at this site, which is currently abandoned. The drums are stacked 5 pallets high. Visual evidence from photographs taken at the site show damage to some of the drums including rust, dents, and holes, and it is likely there will be further deterioration due to the absence of climate control in the warehouse. If one layer of drums fails, a portion of the stack may be compromised and fall, resulting in release of the hazardous substances to the warehouse or to the environment via dust or gravity flow. The doors to the warehouse are damaged and/or open, with the potential for trespassing and vandalism. Such a high volume of hazardous substances represents a potential for discharge of the hazardous substances off-site through the condition of the drums, trespassing, and acts of vandalism.

In addition, this warehouse flooded during a high-water event on the Arkansas River in May/June 2019. The flood caused increased rust on the drums exposed to water and another flood could further compromise the drums or cause physical damage to the warehouse or the drums resulting in a release to the environment.

2. Continued response actions are immediately required to prevent, limit, or mitigate an emergency.

Assistance will not otherwise be provided on a timely basis.

The State of Arkansas has indicated they lack the technical ability and resources to remediate this site and therefore requested EPA to take the lead on addressing the stored drums containing hazardous substances at this Site.

Removal of the drums containing hazardous substances will remove the primary source of hazardous substances, thus preventing discharge off-site. It is anticipated that the cost for removal and disposal of the drums will exceed the statutory limit of two million dollars. The estimated cost to complete this project from the table below is \$4,764,749.22. The work is anticipated to be completed in less than one year.

VI. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed Action Description

The objective of this removal action will be to collect, characterize, segregate, and transport off-site for proper disposal, all hazardous substances associated with this facility, with the goal of reducing the threat of contaminant migration from the Site. Analytical results of the SBM indicate that TCLP values exceeded the toxicity characteristics for cadmium and chromium at one mg/L and five mg/L, respectively. These exceedances prevent the disposal of the untreated SBM into a Subtitle D landfill; therefore, the SBM must be treated to a concentration at or below the EPA's universal treatment standards, or UTS, prior to disposal.

The removal will include loading and shipping the waste material offsite to a qualified hazardous waste management facility for UTS treatment and disposal. In order to reduce material handling, reduce the likelihood of dispersal of the material as dust, and reduce the risk of worker exposure to toxic dusts, drums will not be emptied on-site. The drums will be loaded whole into lined roll-off containers for shipment to the treatment/disposal facility.

Constituent	Toxicity Characteristic as TCLP (mg/L)	Universal Treatment Standard as TCLP (mg/L)
Cadmium	1	0.11
Chromium	5	0.60
Lead	5	0.75

All off-site transport and disposal activities shall be conducted in accordance with the following:

Subtitle C of RCRA, section 3001, et seq., 42 U.S.C. § 6921, et seq., Hazardous Waste Management and implementing federal and state regulations.

Subtitle D of RCRA, section 4001, et seq., 42 U.S.C. § 6941, et seq., State or Regional Solid Waste Plans and implementing federal and state regulations.

- 40 C.F.R. Part 261: Identification and Listing of Hazardous Wastes.
 - Subpart A - General
 - Subpart C - Characteristics of Hazardous Waste (§§ 261.20 - 261.24)
 - Subpart D - Lists of Hazardous Wastes (§§ 261.30 - 261.35)
- 40 C.F.R. Part 262: Standards Applicable to Generators of Hazardous Waste.
 - Subpart A - General (§§ 262.1 - 262.18)
 - Subpart B - Manifest Requirements Applicable to Small and Large Quantity Generators (§§ 262.20 - 262.27)
 - Subpart C - Pre-Transport Requirements Applicable to Small and Large Quantity Generators (§§ 262.30 - 262.35)
 - Subpart D - Recordkeeping and Reporting Applicable to Small and Large Quantity Generators (§§ 262.40 - 262.44)
- 40 C.F.R. Part 263: Standards Applicable to Transporters of Hazardous Waste.
 - Subpart A - General (§§ 263.10 - 263.12)
 - Subpart B - Compliance with the Manifest System and Recordkeeping (§§ 263.20 - 263.25)
 - Subpart C - Hazardous Waste Discharges (§§ 263.30 - 263.31)
- 40 C.F.R. Part 268: RCRA Land Disposal Restrictions.
- 49 U.S.C. § 5101 et seq.: Federal Hazardous Materials Transportation Law and/or 49 C.F.R. Parts 107, 171-177.
 - The Off-Site Rule (40 C.F.R. § 300.440) applies to the off-site transfer of any hazardous substance, pollutant, or contaminant. The off-site transfer of any hazardous substance, pollutant or contaminant during this removal action will be conducted in accordance with the Off-Site Rule.

The regulations at 29 C.F.R. Part 1910: Occupational Safety and Health Standards, also apply.

Contribution to remedial performance

The removal action provided for herein addresses source control and, as such, will not adversely affect any future remedial action performed at the Site.

Applicable or Relevant and Appropriate Requirements

Section 300.415(j) of the National Contingency Plan, or NCP provides that removal actions shall, to the extent practicable considering the exigencies of the situation, attain applicable or relevant and appropriate requirements (ARARs) under federal environmental or state environmental facility siting laws.

Federal ARARs

- Subtitle C of RCRA, section 3001, et seq., 42 U.S.C. § 6921, et seq., Hazardous Waste Management and implementing federal and state regulations.
- Subtitle D of RCRA, section 4001, et seq., 42 U.S.C. § 6941, et seq., State or Regional Solid Waste Plans and implementing federal and state regulations.
- 40 C.F.R. Part 261: Identification and Listing of Hazardous Wastes.
 - Subpart A - General
 - Subpart C - Characteristics of Hazardous Waste (§§ 261.20 - 261.24)
 - Subpart D - Lists of Hazardous Wastes (§§ 261.30 - 261.35)
- 40 C.F.R. Part 262: Standards Applicable to Generators of Hazardous Waste.
 - Subpart A - General (§§ 262.1 - 262.18)
 - Subpart B - Manifest Requirements Applicable to Small and Large Quantity Generators (§§ 262.20 - 262.27)
 - Subpart C - Pre-Transport Requirements Applicable to Small and Large Quantity Generators (§§ 262.30 - 262.35)
 - Subpart D - Recordkeeping and Reporting Applicable to Small and Large Quantity Generators (§§ 262.40 - 262.44)

2. Project Schedule

This time-critical removal action will begin upon approval of this Action Memorandum. It is anticipated that this removal action will be completed within twelve months from the initiation of the removal action.

B. Estimated Costs

Extramural Costs	Costs	Subtotal
ERRS	\$1,909,000	
START	\$290,000	
Total Extramural		\$2,199,000
Site Contingency (20%)	\$439,800	
CEILING:	\$2,638,800	

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

If this response action is not taken, the potential for human exposure to contaminants at the Site will remain unabated. Drums accumulated in the warehouse will continue to degrade. Releases may be initiated through acts of vandalism, flooding or the eventual degradation of the drums. If site work is delayed, remedial options will be limited and may result in longer and more costly actions.

VII. OUTSTANDING POLICY ISSUES

There are no known outstanding policy issues associated with this Site.

VIII. ENFORCEMENT

A separate Enforcement Attachment provides a confidential summary of current and potential future enforcement actions for the Site.

The total cost for this Removal Action based on full-cost accounting practices that will be eligible for cost recovery are estimated to be \$4,764,749.22.

(Direct Cost) + (Other Indirect Costs) + 64.15% (Direct + Indirect Costs) = Estimated EPA Cost

$$\$2,638,800 + \$263,880 + 64.15\% (\$2,638,800 + \$263,880) = \$4,764,749.22$$

Direct costs include direct extramural costs. Other indirect costs include 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, 2002. The 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

the deviation of actual total costs from this estimate will affect the United States' right to cost recover.

IX. RECOMMENDATION

This decision documents the selected removal action for the U.S. Technology FS Site, Fort Smith, Sebastian County, Arkansas developed in accordance with CERCLA, 42 U.S.C. § 9601 et seq., and not inconsistent with the NCP, 40 C.F.R. Part 300. This action was based on the administrative record for the Site.

Because the conditions at the Site meet the criteria defined in Section 300.415 of the NCP, I recommend your approval of the proposed removal action.

APPROVED: _____ DATE: _____

John Meyer, Acting Director
Superfund and Emergency Management Division (6SED)