



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
EMERGENCY RESPONSE BRANCH
9311 GROH ROAD, ROOM 216
GROSSE ILE, MI 48138-1697

SEP 27 1999

MEMORANDUM

REPLY TO ATTENTION OF:

SUBJECT: ACTION MEMORANDUM - Determination of Threat to Public Health, Welfare, or the Environment at the Textile Road Site, Ypsilanti Township, Washtenaw County, Michigan (Site ID #05AM)

FROM: P.C. Lall, On-Scene Coordinator
Emergency Response Branch - Section 1

TO: William E. Muno, Director
Superfund Division

THRU: Richard C. Karl, Chief
Emergency Response Branch

EPA Region 5 Records Ctr.



237201

I. PURPOSE

The purpose of this memorandum is to document the determination of an imminent and substantial threat to public health and the environment posed by the presence of contaminated soils and backfill contaminated with PCBs and other organic solvents at this 62 acre property in Ypsilanti Township, Washtenaw County, Michigan. The site has been thoroughly characterized by conducting an EE/CA study by the potentially responsible parties (PRPs). The actions proposed herein will mitigate Site conditions by implementing a removal action selected after publication of a proposed plan and public comment period. It is anticipated that the removal action will be conducted by the PRPs pursuant to an Administrative Order. The site was secured with a complete perimeter fence during phase I activities, and is considered a non-time-critical site.

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

II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID #MID 980 825 558

Please see Action Memorandum dated August 8, 1988 (attachment 2), and Action Memorandum dated October 29, 1991 (attachment 3).

The Textile Road Site is an inactive industrial property located southeast of the corner of Textile Road and Bunton Road in Ypsilanti Township, Washtenaw County, Michigan. The site is bounded to the north by Textile Road, to the west by Bunton Road, to the east by a Ford Motor Company facility and to the south by an agricultural property. The site is the location of former gravel pits. The owners of the property allowed the dumping of fill material in areas previously excavated during the gravel pit operations. This fill material included wastes from local industries.

On March 22, 1983, in response to a complaint from a local resident concerning drums on the Site, the Michigan Department of Natural Resources (MDNR) and the Washtenaw County Department of Public Health inspected the Site. Numerous drums were observed. On April 12, 1983, the MDNR returned to the Site to collect samples of soil and water, and material contained in approximately 40 drums. The analysis of soils and drum contents indicated the presence of polychlorinated biphenyls (PCBs) in concentrations greater than 50 parts per million (ppm).

On November 29, 1983, the MDNR notified Mr. Thumm and the Holtzman-Silverman Realty Company of the contaminants on the Site and requested that as potentially responsible parties they initiate a cleanup at the Site. Both parties declined to initiate the cleanup, denying ownership to the property. However, in February-March of 1984, the Holtzman-Silverman Realty Company arranged for the proper disposal of 49 drums from the Site.

On March 20, 1987, the MDNR collected five drums and two soil samples for additional site characterization.

On October 27, 1987, the MDNR met with three members of the Ecology and Environment, Field Investigation Team (FIT) at the Site to discuss monitoring well installation. The inspection team observed 13 55-gallon drums on the Site.

On December 16, 1987, the U.S. EPA Technical Assistance Team (TAT) and the U.S. EPA On-Scene Coordinator, Peter D. Neithercut, conducted a site inspection and assessment. The team observed 21 55-gallon drums. The site assessment team did not take samples but reviewed various MDNR analytical sampling results. The review of MDNR samples confirmed the presence of PCB concentrations above 50 ppm at the site.

On September 16, 1998, the U.S. EPA issued a Unilateral Administrative Order (docket number V-W-88-C-123) to Holtzman-Silverman Builders and Lamar Thumm requiring them to remove drums from the Site and remove soil contaminated with PCBs.

On September 19, 1991, an agreement was reached between U.S. EPA and Holtzman-Silverman Realty Company, and an Administrative Order by Consent (AOC) (docket

number V-W-91-C-123), was issued. The company agreed to fence the Site and remove the drums from the Site. The work was completed in November 1991.

On March 10, 1993, U.S. EPA issued an AOC (number V-W-93-C-18) to Holtzman-Silverman Realty Company and General Motors Corporation. The Order required the completion of an Extent of Contamination (EOC) study and an Engineering Evaluation and Cost Analysis (EE/CA).

In February 1994, an EOC report for the Site was completed. The report confirmed the presence of PCBs at the Site.

In November 1994, the EE/CA report for the Site was completed and in February 1996 an addendum to the EE/CA report was completed.

In August 1997, the U.S. EPA issued a Proposed Plan, which described a recommended removal alternative for the Site, and on August 13, 1997, during a public comment period, the U.S. EPA conducted a public meeting regarding the Site. The U.S. EPA described the alternative actions or remedies that could be used to cleanup the Site as identified and explained in the EE/CA report and indicated its proposed alternative for the Site.

Several comments were received during the public comment period and the U.S. EPA received additional information regarding the future use and zoning of the Site. As a result, in November 1998, the U.S. EPA issued a Revised Proposed Plan, which described a revised recommended removal alternative for the Site. A new public comment period was opened and another public meeting was held on November 23, 1998.

The area surrounding the site does not meet category IV Environmental Justice Criteria employed by U.S. EPA Superfund Program.

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

The conditions at the Textile Road Site present an imminent and substantial threat to public health, welfare, and the environment and meet the criteria for a removal action provided for in the National Contingency Plan (NCP), 40 CFR Section 300.415, paragraph (b)(2), specifically:

- a) Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants;

Approximately ten acres of site property have high levels of PCBs, organic solvents, and heavy metals in Site soils. Dermal contact and tracking of these contaminants, as well as transport in the shallow groundwater table, present a real threat of exposure to human populations.

- b) High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface, that may migrate;

Analytical results indicated that surface soils contain elevated levels of PCBs in the 500 to 600 ppm range. In the state of Michigan, the residential soil cleanup standard is 1.2 ppm and commercial soil at 26 ppm.

In addition, one of the seven wells installed in the upper most aquifer during the EOC had detectable levels of PCB in the groundwater. Removal of the source material from the site followed by groundwater monitoring is essential.

IV. ENDANGERMENT DETERMINATION

Given the site conditions, the nature of the 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 Action Memorandum, may present an imminent and substantial endangerment to public health, or welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

The OSC proposes that the following actions be undertaken by the PRPs to mitigate threats posed by the presence of hazardous substances at the Textile Road Site:

- 1) Maintain and augment site security;
- 2) Implement a Site health and safety plan;
- 3) Excavate and dispose off site in appropriate landfills all soils, sediments, and other materials on site containing PCB concentrations of equal to or greater than 26 ppm. Disposal of all contaminated materials off site shall be in accordance with Federal, state, and local regulations and consistent with EPA's off-site rule;
- 4) Excavate, consolidate, and cover with an approved soil cover system all soil, sediments, and other materials on site containing PCB concentrations of equal to or greater than 1.2 ppm and less than 26 ppm. The covered area shall be

located in the northern area of the site on property that is zoned for commercial use at the time of implementation of the removal action;

- 5) Conduct post removal testing for all contaminants of concern identified in the EOC study to demonstrate the effectiveness of the removal;
- 6) Install groundwater monitoring wells, as described in the work plan;
- 7) Implement appropriate operations and maintenance during the post removal phase of the removal (including groundwater monitoring); and
- 8) Implement institutional controls consistent with the work plan, the EE/CA, and Part 201 of Michigan Public Act 451 of 1994, as amended, to insure the maintenance of the cover.

A work plan has been submitted by the PRPs' contractor and has been approved by EPA. The work plan will become an attachment to the Administrative Order after the Order is signed.

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 U.S. EPA, with the U.S. EPA Off-Site Rule, 40 CFR § 300.440, 58 Federal Register 49215 (September 22, 1993).

The OSC has initiated consideration of post-removal site control consistent with the provisions of Section 300.415 (I) of the NCP. It is anticipated that any post-removal Site controls will be undertaken by the PRPs.

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

Applicable or Relevant and Appropriate Requirements

All applicable, relevant, and appropriate requirements (ARARs) of Federal and state law will be complied with to the extent practicable. The Michigan Department of Environmental Quality and Public Health Department have been working together with EPA Region V during the remedy selection, cleanup criteria selection and public comment period. State generic residential and commercial cleanup criteria has been chosen for this removal action.

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

Continued risk to public health and the environment will result if no action or delayed action ensues.

VII. OUTSTANDING POLICY ISSUES

There are no outstanding policy issues associated with this site.

VIII. ENFORCEMENT

For administrative purposes, information concerning the enforcement strategy for this Site is contained in the Enforcement Confidential Addendum.

IX. RECOMMENDATION

This decision document represents the selected removal action for the Textile Road Site located in Ypsilanti Township, Washtenaw County, Michigan, developed in accordance with CERCLA, as amended, and is not inconsistent with the NCP. This decision is based upon the Administrative Record for the site. Conditions at the site continue to meet the NCP Section 300.415(b)(2) criteria for a removal and I recommend your approval of the proposed removal action. You may indicate your decision by signing below.

APPROVE: _____

Director, Superfund Division

WEM

DATE: _____

9/27/99

DISAPPROVE: _____

Director, Superfund Division

DATE: _____

Enforcement Addendum

Attachments

1. Administrative Record Index
2. Action Memorandum dated August 8, 1988
3. Action Memorandum dated October 29, 1991

cc: K. Mould, U.S. EPA, 5202-G
M. Chezik, U.S. Dept. of the Interior, **w/o Enf. Addendum**
A. Howard, MDEQ, **w/o Enf. Addendum**
R. Harding, MDEQ, **w/o Enf. Addendum**
J. Granholm, MI Dept. of Attorney General, **w/o Enf. Addendum**

TEXTILE ROAD

BCC PAGE

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NOT RELEVANT TO THE SELECTION OF REMOVAL ACTION

TEXTILE ROAD

ENFORCEMENT ADDENDUM

REDACTED

(1 PAGE)

NOT RELEVANT TO THE SELECTION OF REMOVAL ACTION

TEXTILE ROAD

ATTACHMENT 1

AR INDEX

ATTACHMENT 1

U.S. ENVIRONMENTAL PROTECTION AGENCY

 ADMINISTRATIVE RECORD
 FOR
 TEXTILE ROAD SUPERFUND SITE
 YPSILANTI, WASHTENAW COUNTY, MICHIGAN

OCTOBER 2, 1991

<u>NO.</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
1	06/29/83	MDNR	U.S. EPA	PCB Inspection Report	9
2	09/00/83	MDNR	U.S. EPA	Fish and Sediment Sampling Report	4
3	05/02/85	U.S. EPA		TSCA Suit, Docket TSCA-V-C-222	34
4	11/03/87	Goode, G., E & E, FIT	Ostrodka, S., U.S. EPA	FIT Inspection Report	2
5	05/27/88	Weston-Sper	U.S. EPA	Removal Action Plan	18
6	08/08/88	Neithercut, P., U.S. EPA	Constantelos, B., U.S. EPA	Action Memorandum	5
7	09/16/88	U.S. EPA		Administrative Order	14
8	09/30/88	Capone, D. & P. Wicklein, Weston	Faryan, S., U.S. EPA	Letter Report-Extent of Contamination	7
9	04/13/89	Chuey, J., Maecorp, Inc.	Walker, F., Canton Analytical Lab., Inc.	Sampling Results	11
10	04/14/89	Chuey, J., Maecorp, Inc.	Walker, F., Canton Analytical Lab., Inc.	Sampling Results	28
11	04/20/89	Chuey, J., Maecorp, Inc.	Walker, F., Canton Analytical Lab., Inc.	Sampling Results	27
12	09/19/91	Ullrich, D., U.S. EPA	Stoll, R., Freedman, Levy, Kroll, Simonds	Administrative Order By Consent	103
13	10/29/91	Bowlus, R., U.S. EPA	Ullrich, D., U.S. EPA	Action Memorandum	16

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<u>UPDATE #1</u> DECEMBER 9, 1991					
1	11/00/91	Spranger, S., Bionetics Corporation	Howard, G., U.S. EPA	Site Analysis	25
<u>UPDATE #2</u> JULY 22, 1997					
1	02/00/94	Conestoga- Rovers & Associates	U.S. EPA	Task 8: "Extent of Contamination (EOC) Study Report" for the Textile Road Site	530
2	11/00/94	Conestoga- Rovers & Associates	U.S. EPA	"Engineering Evaluation and Cost Analysis (EE/CA) Report" for the Textile Road Site	466
3	02/00/96	Conestoga- Rovers & Associates	U.S. EPA	"Re-evaluation of Select Removal Action Alterna- tives: Addendum to the EE/CA Report" for the Textile Road Site	47
4	07/18/97	Carli, G., Conestoga- Rovers & Associates	Chabria, M., U.S. EPA	Letter Forwarding Attached Table 1: Updated Engineering Cost Estimate for the Proposed Removal Action at the Textile Road Site	3
<u>UPDATE #3</u> AUGUST 11, 1997					
1	08/00/97	U.S. EPA	Public	Proposed Plan for the Textile Road Superfund Site	8
2	08/00/97	U.S. EPA	File	Mini Community Involve- ment Plan for the Textile Road Site	4

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<u>UPDATE #4</u> NOVEMBER 9, 1998					
1	00/00/88	Carsel, R., et al.		Journal Article: <i>Characterizing the Uncertainty of Pesticide Leaching in Agricultural Soils</i> (Journal of Contaminated Hydrology: 2, 111-124)	14
2	05/17/94	Ypsilanti Township		Map: Zoning Districts for Ypsilanti Township	1
3	06/05/95	Howard, A., MDNR	MDNR/ Environmental Response Division	ERD Operational Memo- randum #14, Revision 2: Remedial Action Plans Using Generic Industrial Or Generic Commercial Cleanup Criteria and Other Requirements (INTERIM DRAFT)	30
4	00/00/96	Wester, R., et al.		Journal Article: <i>Percutaneous Absorption of 2,4-Dichlorophenoxyacetic Acid from Soil with Respect to Soil Load and Skin Contact Time: In Vivo Absorption in Rhesus Monkey and In Vitro Absorption in Human Skin</i> (Journal of Toxicology and Environmental Health: 47, 335-344)	10
5	07/00/96	U.S. EPA/ OSWER	U.S. EPA	Soil Screening Guidance: User's Guide (Publication 9355.4-23)	84
6	07/29/97	U.S. EPA	Public	Public Notice: Availa- bility of Administrative Record and Proposed Plan for the Textile Road Site (Ypsilanti Press)	1
7	08/00/97	U.S. EPA	Public	<i>Proposed Plan</i> for the Textile Road Site	8
8	08/20/97	Stumbo, B., Charter Township of Ypsilanti/ Board of Trustees	Winters, W., McLain & Winters	Memorandum re: Prepara- tion of Board's Official Comments on the Proposed Plan for the Textile Road Site	1

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9	08/21/97	Profit, K., Michigan House of Representatives	Gawlinski, D., U.S. EPA	Letter re: Additional Public Hearing on the Proposed Plan for the Textile Road Site	1
10	08/25/97	Winters, W.; McLain & Winters	Gawlinski, D., U.S. EPA	Letter re: Charter Town- ship of Ypsilanti's Comments on and Request for a Second Public Hearing on the Proposed Plan for the Textile Road Site w/ Attachments	12
11	08/26/97	U.S. EPA	Public	Public Notice: Announce- ment of an Extension to the Public Comment Period on the Proposed Cleanup Plan at the Textile Road Site (<i>Ypsilanti Press</i> and <i>Ypsilanti Courier</i>)	1
12	08/29/97	Huron Reporting Service, Inc.	U.S. EPA	<i>Transcript</i> of the August 13, 1997 Public Meeting re: the Textile Road Site	74
13	09/00/97	Concerned Citizens	U.S. EPA	Public Comments Received August 6 - September 27, 1997 re: the Proposed Plan for the Textile Road Site	8
14	09/04/97	Bobbin, J., Washtenaw County Drain Commissioner	Gawlinski, D., U.S. EPA	Letter re: Comments on the Proposed Cleanup of the Textile Road Site	1
15	09/15/97	Smith, A., Michigan Senate	Gawlinski, D., U.S. EPA	Letter re: Cleanup Standards at the Textile Road Site	1
16	09/16/97	Profit, K., Michigan House of Representatives	Gawlinski, D., U.S. EPA	Letter re: Cleanup of the Textile Road Site	1
17	09/17/97	Rivers, L., U.S. House of Representatives	Browner, C., U.S. EPA	Letter re: U.S. EPA's Proposed Clean-up of the Textile Road Site	1
18	09/27/97	Turchan, G., Conestoga- Rovers & Associates	Gawlinski, D., U.S. EPA	FAX Transmission re: Textile Road Cooperating Parties Group's Comments on the Proposed Plan for the Textile Road Site	10

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19	09/29/97	Turchan, G., Conestoga- Rovers & Associates	Gawlinski, D., U.S. EPA	Letter re: Update to Comment #3 in CRA's September 27, 1998 FAX Transmission Concerning the Textile Road Group's Comments on the Proposed Plan for the Textile Road Site	4
20	09/30/97	Shaw, S., Washtenaw County Board of Commissioners	Gawlinski, D., U.S. EPA	Letter re: Comments on the Proposed Plan for the Textile Road Site	2
21	10/07/97	Ullrich, D., U.S. EPA	Rivers, L., U.S. House of Representatives	Letter re: U.S. EPA's Reply to September 17, 1997 Letter Concerning the Proposed Clean-up of the Textile Road Site	1
22	01/21/98	Winters, W.; McLain & Winters	Carli, G., Conestoga- Rovers & Associates	Letter re: Ypsilanti Township Board's Agree- ment with the Proposed Amendments to the Removal Action Work Plan for the Textile Road Site	1
23	01/22/98	Turchan, G., Conestoga- Rovers & Associates	Lall, P. & M. Chabria; U.S. EPA	Letter re: Revisions to Proposed Removal Action at the Textile Road Site	7
24	03/23/98	Kleppe, G., MDEQ	Chabria, M., U.S. EPA	Letter re: Change in Cleanup Standards for the Textile Road Site w/ Attached Information Concerning MDEQ Generic PCB Cleanup Criteria	10
25	04/22/98	Marouf, A., U.S. EPA	Lall, P., U.S. EPA	Memorandum re: Technical Review of the Revisions to the Proposed Removal Action at the Textile Road Site	2
26	06/23/98	Turchan, G., CRA	Chabria, M., U.S. EPA	Letter re: Selection of Cleanup Criteria for the Removal Action at the Textile Road Site	27
27	06/29/98	Federal Register	Public	<i>Disposal of Polychlor- inated Biphenyls (PCBs); Final Rule (Vol. 63, No. 124, pp. 35384-35474)</i>	92

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28	07/01/98	Marouf, A., U.S. EPA	Lall, P., U.S. EPA	Memorandum re: Technical Review of the Selection of Cleanup Criteria for the Removal Action at the Textile Road Site	1
29	10/01/98	U.S. EPA/ Region III	U.S. EPA	U.S. EPA/Region III Risk-Based Concentration Table	10
30	10/07/98	Novello, D. & T. Taylor; Freedman, Levy, Kroll & Simonds	Chabria, M., U.S. EPA	Letter re: Modification of TSCA Rules on Disposal of PCBs at the Textile Road Site	5
31	11/00/98	U.S. EPA	Public	Responsiveness Summary for the Textile Road Site	16
32	11/04/98	Carli, G., Conestoga- Rovers & Associates	Chabria, M. & P. Lall; U.S. EPA	Letter re: Proposed Removal Action Updated Engineer's Project Cost Estimate for the Textile Road Site	3
33	11/00/98	U.S. EPA	Public	Revised Proposed Plan for the Textile Road Site	10

UPDATE #5
SEPTEMBER 22, 1999

1	00/00/00	Lall, P., U.S. EPA	Muno, W., U.S. EPA	Action Memorandum: Determination of Threat to Public Health, Welfare, or the Environment at the Textile Road Site (PENDING)
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TEXTILE ROAD

ATTACHMENT 2

**ACTION MEMORANDUM
AUGUST 8, 1988**

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: AUG 8 1988

SUBJECT: ACTION MEMORANDUM - Request for Removal Action at the Holtzman-Silverman Site, Ypsilanti, Michigan (Site Spill ID #AMY)

FROM: Peter D. Neithercut, On-Scene Coordinator
Emergency Response Branch

TO: Basil G. Constantelos, Director
Waste Management Division

Mary A. Gade, Acting Associate Division Director
Office of Superfund

PURPOSE

The purpose of this memorandum is to request approval to expend up to \$55,750 to initiate an extent of contamination sampling at the Holtzman-Silverman site. This study will require an estimated five on-site working days to complete.

BACKGROUND

The Holtzman-Silverman site is a former gravel pit located south of Ypsilanti, Michigan, in Ypsilanti Township, Washtenaw County. The 62-acre site is generally flat with only one small building. There are two large ponds on the site. The native soil is classified as Fox Sandy Loam.

The owners of the property allowed the dumping of fill material in areas previously excavated; during the gravel pit operations, to keep the property above the shallow water table. This material included wastes from local industries.

Nearby residents use the site for recreation. Fishermen use the large ponds for fishing. A large portion of the site is used as a track for off road vehicles. Other areas appear to be used for picnics and parties.

On October 27, 1987, United States Environmental Protection Agency (U.S. EPA) Field Investigation Team (FIT) and a representative of the Michigan Department of Natural Resources (MDNR) visited the Holtzman-Silverman site. The team observed an estimated 13 drums of unknown materials and an area with soils highly saturated with an oil like substance.

On June 29, 1988, the U.S. EPA Technical Assistance Team (TAT) and U.S. EPA On-Scene Coordinator Peter D. Neithercut visited the Holtzman-Silverman site to perform a site assessment. Surface samples confirmed the presence of Polychlorinated Biphenyls (PCB) contamination above 50 parts per million (ppm). Depth sampling was not possible due to an asphalt like layer at a depth of 4 inches. Samples from this hard layer showed 116 ppm PCB's. It will be necessary to use heavy equipment to penetrate this layer and determine the vertical extent of contamination.

This site is not on the National Priorities List (NPL).

THREAT

This facility presents an immediate and substantial threat to human health and the environment. As outlined in the National Contingency Plan (NCP), 40CFR300.65(b)(2), the following criteria are met by the Holtzman-Silverman site:

- 1) Actual or potential exposure to hazardous substances or pollutants or contaminants by nearby populations, animals, or food chain;

Access to the site is not restricted. There are vehicle tracks throughout the site. A temporary fence erected by the MDNR to isolate a contaminated area has been driven over by off road vehicles. Local residents have been observed fishing in the two large ponds on the site.

- 2) Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release; and,

Thirteen abandoned drums have been discovered on-site. An inspection of these drums showed they contain varying amounts of unknown material. It also showed that the drums were dented, bent, rusted, and several were open or had ruptured.

- 3) High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface, that may migrate.

Analytical results from samples taken in the contaminated area show PCB's in the range of 120 ppm. This contaminated loose fill was placed on top of the native sandy loam soils. There is a potential for this material to migrate, via groundwater or surface run-off, into the ponds on-site exposing the entire water shed. This potential is demonstrated by the level of 2 ppm PCB's found in a sample taken from the pond sediments.

ENFORCEMENT

See the confidential enforcement information in Attachment I.

PROPOSED PROJECT AND COST

The objective of this removal action is to conduct a study which will identify the lateral and vertical extent of contamination. The results of this study will be used to determine a method of site closure and generate a detailed cost estimate.

The following steps are proposed at the site:

- 1) Develop and implement site safety and security measures.
- 2) Implement an air monitoring program.
- 3) Develop an extent of contamination sampling plan.
- 4) Dig a series of trenches through the contaminated area.
- 5) Sample soils according to the sampling plan.

The estimated project costs are:

Cleanup Contractor	\$33,000
15% Contingency	5,000
Subtotal	<u>\$38,000</u>
TAT/TES	7,500
Extramural Subtotal	<u>\$45,500</u>
Extramural Contingency (15%)	6,825
=====	=====
EXTRAMURAL TOTAL	\$52,325
U.S.EPA Direct Costs (41 Regional hrs + 4 HQ hrs x \$30/hr)	\$1,350
U.S.EPA Indirect Costs (41 Regional hrs x \$51/hr)	\$2,075
=====	=====
INTRAMURAL TOTAL	\$3,425
PROJECT TOTAL	\$55,750

This action will require approximately 5 on-site working days to complete. It is anticipated that additional removal funds will be required to complete this action.

Due to the heavy recreational use of this area, this is a time critical action. This action is necessary to plan for further action and is consistent with any long-term remedial action that may be necessary.

RECOMMENDATION

Because the conditions at the Holtzman-Silverman site in Ypsilanti, Michigan, meet the NCP Section 300.65 criteria for a removal action, your approval of this request is recommended. The estimated total project costs are \$55,750, of which up to \$44,825 (\$33,000 line item, plus \$5,000 contingency, plus up to \$6,825 of extramural contingency) could be used for extramural cleanup contractor costs. You may indicate your decision by signing below.

APPROVE:

M. A. Hor
Director, Waste Management Division

DATE:

8/8/88

DISAPPROVE:

Director, Waste Management Division

DATE: _____

Attachment

TEXTILE ROAD

ENFORCEMENT ADDENDUM
AUGUST, 1988

REDACTED
(1 PAGE)

NOT RELEVANT TO THE SELECTION OF REMOVAL ACTION

TEXTILE ROAD

ATTACHMENT 3

**ACTION MEMORANDUM
OCTOBER 29, 1991**

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

OCT 29 1991

DATE:

SUBJECT: ACTION MEMORANDUM - Ceiling Increase and 12-Month Exemption Request to Continue Removal Action at the Textile Road Site, Ypsilanti, Washtenaw County, MI (Site ID #AM)

FROM: Robert W. Bowlus, On-Scene Coordinator *Robert W. Bowlus*
Emergency and Enforcement Response Branch - Section I

TO: David A. Ullrich, Director
Waste Management Division

THRU *for* Norman R. Niedergang, Associate Division Director
Office of Superfund *Jodi Kraus*

I. PURPOSE

The purpose of this memorandum is to request and document your approval to expend up to an additional \$173,700 and continue the removal action beyond 12 months in order to continue time-critical removal response actions at the Textile Road site in Washtenaw County, Michigan. Should the PRP fail to perform the necessary tasks specified and agreed to in the Administrative Order by Consent pursuant to Section 106 of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 as amended, 42 U.S.C. Section 9606(a), these funds will be available to complete the work. This site was identified as the Holtzman-Silverman site in the August 8, 1988, Action Memorandum. The name was changed to provide better locational identity to the site and to conform with the name used by the state agency and others. Continued response activities include off-site disposal of drummed hazardous materials and site fencing/posting.

This site is not on the National Priorities List, does not set any precedents, and is not nationally significant.

II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID = MID 980 825 558

Please see Action Memorandum dated August 8, 1988 (Attachment 3).

Removal actions were started at the Textile Road site on March 27, 1989. To date, the following removal objectives have been completed:

- A) Conducted an extent-of-contamination study and geophysical study on site.
- B) Negotiations with the PRPs have continued.
- C) In February 1984, the PRPs disposed of 49 drums and staged others inside a fenced area on site.

The following removal objectives require continued response actions and a project ceiling increase to complete:

- A) Fencing the site to secure contamination.
- B) Removal and disposal off site of drummed wastes.

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

Please see Action Memorandum dated August 8, 1988 (Attachment 3).

Although all excavated wastes have been staged on the surface of the site and covered with protective fabric, the previously identified threats will continue to exist until such time as these wastes have been transported from the site for secure disposal/treatment.

- a. actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances, pollutants or contaminants;

This factor is present at the site due to the observation of local residents fishing in the two large ponds at the site and because of the use of off-road vehicles on the site.

- b. hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release;

This factor is present at the site due to the existence of 21 abandoned drums discovered on site. An inspection of these drums showed they contain varying amounts of unknown material. It also showed that the drums were dented, bent, rusted, and several were open or had ruptured.

- c. high levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface, that may migrate;

This factor is present at the site based upon analytical results from samples taken from the site that show PCBs in excess of 50 ppm in soils at the site.

IV. ENDANGERMENT DETERMINATION

Given the site conditions, the nature of the hazardous substances on site, and the potential exposure pathways to the nearby population described in Sections II and III above, actual or threatened releases of hazardous materials from this site, if not addressed by implementing the response action selected in this Action Memorandum, may continue to present an imminent and substantial endangerment to public health, or welfare, or the environment.

V. EXEMPTION FROM STATUTORY LIMITS

Continued response actions are otherwise appropriate and consistent with the remedial action to be taken:

- A) An exemption from statutory limits is justified because there is an immediate risk to public health or welfare or the environment as discussed above. Moreover, continued response actions are immediately required to prevent, limit or mitigate an emergency, and assistance will not otherwise be provided on a timely basis.
- B) Removal of the drums of waste will not interfere with likely remedial alternatives to address soil and groundwater contamination. The removal action is also appropriate because the drums and their contents will be incinerated, not disposed of in a landfill.
- C) The construction of a fence will reduce exposure to the human population from hazardous substances, pollutants, or contaminants by restricting access to the site by hunters and fishermen.

VI. PROPOSED ACTIONS AND ESTIMATED COSTS

The OSC proposes to undertake the following to continue mitigation of threats posed by the presence of hazardous wastes at the Textile Road site:

- 1) Provide for site security by construction of a permanent fence around the facility and by posting of warning signs.
- 2) Develop and implement site health and safety plan.
- 3) Remove and properly dispose of all drums of hazardous materials previously staged in the fenced compound.

The estimated costs to complete the above activities are summarized below. These activities will require an estimated increase of 50 on-site working days to complete. Detailed cleanup contractor costs are presented in Attachment 1.

<u>EXTRAMURAL COSTS:</u>	<u>Current Ceiling</u>	<u>Proposed Increase</u>	<u>Proposed Ceiling</u>
Regional Allowance Costs	\$ 33,000	\$ 87,900	\$120,900
Contingency (15%)	<u>5,000</u>	<u>13,200</u>	<u>18,200</u>
	\$ 38,000	\$101,100	\$139,000
Other Extramural Costs:			
TAT/TES	<u>7,500</u>	<u>20,000</u>	<u>27,500</u>
Extramural Subtotal	\$ 45,500	\$121,100	\$166,500
Extramural Contingency (15%)	<u>6,825</u>	<u>18,200</u>	<u>25,025</u>
TOTAL, EXTRAMURAL COSTS	\$ 52,325	\$139,300	\$191,625
<u>INTRAMURAL COSTS:</u>			
U.S. EPA Direct Costs [\$30/hr x (400 hrs + 40 HQ hrs)]	\$ 1,350	\$ 13,200	\$ 14,550
U.S. EPA Indirect Costs (\$53/hr x 400 Regional hrs)	<u>2,075</u>	<u>21,200</u>	<u>23,275</u>
TOTAL INTRAMURAL COSTS	\$ 3,425	\$ 34,400	\$ 37,825
	=====	=====	=====
TOTAL REMOVAL PROJECT CEILING	\$ 55,750	\$173,700	\$229,450

The removal is consistent with any long-term remedial action and is concurred with by the Michigan Department of Natural Resources (MDNR). Mr. Oladipo Oyinsan, MDNR Waste Management Division, SE Michigan District Office, has been contacted by the On-Scene Coordinator (OSC) and briefed on our plans during a meeting in June 1991. This site is a non-NPL facility; however, the site is in the process of being ranked as a candidate for the NPL. The completion of this removal action will not impede future responses that the State of Michigan may consider.

All applicable or relevant and appropriate requirements (ARARs) will be complied with to the extent practicable. A letter was sent on September 17, 1991, to the MDNR requesting that it identify State and local ARARs. Any ARARs identified in a timely manner for this removal action will be complied with to the extent practicable.

The On-Scene Coordinator has begun planning for provision of post-removal site control, consistent with the provisions of Section 300.415(k) of the NCP.

The response actions described in this memorandum directly address actual or threatened releases of hazardous substances, pollutants or contaminants at the facility which may pose an imminent and substantial endangerment to public health and safety and to the environment. These response actions do not impose a burden on 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

Delayed or no action may result in increased likelihood of direct contact threat to human population accessing the site, exposure of wildlife to hazardous wastes at the site and degradation of local groundwater conditions.

VIII. OUTSTANDING POLICY ISSUES

There are no outstanding policy issues associated with this site.

IX. ENFORCEMENT

Information concerning the enforcement strategy for this site is confidential and is in an Enforcement Confidential Addendum.

X. RECOMMENDATIONS

This decision document recommends continuation of the selected removal action for the Textile Road site in Ypsilanti, Washtenaw County, Michigan, developed in accordance with CERCLA, as amended by SARA, and not inconsistent with the National Contingency Plan. This decision is based on the Administrative Record for the site, the index of which is Attachment 2.

Because the conditions at the Textile Road site in Ypsilanti, Washtenaw County, Michigan, continue to meet the National Contingency Plan Section 300.415 criteria for a removal action and the CERCLA Section 104(c)

consistency exemption for the 12-month limitation, your approval of this request is recommended. The estimated total project increase is \$173,700, of which up to \$119,300 may be used for extramural cleanup contractor costs. You may indicate your decision by signing below.

Approved David A. Ullid Date 10/24/91
Director, Waste Management Division

Disapproved _____ Date _____
Director, Waste Management Division

Enforcement Addendum

Attachments (3)

1. Cleanup Contractor Cost Estimate
2. Index to the Administrative Record
3. Action Memorandum dated 8/8/88

cc: T. Johnson, OS-210
A. Howard, MDNR Superfund Coordinator
S. Huff, U.S. Department of Interior

TEXTILE ROAD

BCC PAGE

(1 PAGE)

NOT RELEVANT TO THE SELECTION OF REMOVAL ACTION

TEXTILE ROAD

ENFORCEMENT ADDENDUM
SEPTEMBER, 1991

REDACTED
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NOT RELEVANT TO THE SELECTION OF REMOVAL ACTION

ATTACHMENT 1

ESTIMATED CLEANUP CONTRACTOR COST INCREASE
TEXTILE ROAD SITE
WASHTENAW COUNTY, MICHIGAN
SEPTEMBER 1991

Personnel and Equipment	\$ 5,000
Sampling and Analysis	2,800
Disposal	10,500
Transportation	1,000
Other Subcontracts	68,600
	<u><u> </u></u>
	\$87,900

ATTACHMENT 2
ADMINISTRATIVE RECORD
FOR
TEXTILE ROAD

Ypsilanti, Michigan

October 2, 1991

<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
06/29/83	MDNR	U.S. EPA	PCB Inspection Report	9
09/00/83	MDNR	U.S. EPA	Fish and Sediment Sampling Report	4
05/02/85	U.S. EPA		TSCA Suit, Docket TSCA-V-C-222	34
11/03/87	Goode, G., E & E, FIT	Ostrodka, S., U.S. EPA	FIT Inspection Report	2
05/27/88	Weston-Sper	U.S. EPA	Removal Action Plan	18
08/08/88	Neithercut, P., U.S. EPA	Constantelos, B.G., U.S. EPA	Action Memorandum	5
09/16/88	U.S. EPA		Administrative Order	14
09/30/88	Capone, D., Wicklein, P., Weston	Faryan, S., U.S. EPA	Letter Report-Extent of Contamination	7
04/13/89	Chuey, J., Maecorp, Inc.	Walker, F., Canton Analytical Lab., Inc.	Sampling Results	11
04/14/89	Chuey, J., Maecorp, Inc.	Walker, F., Canton Analytical Lab., Inc.	Sampling Results	28
04/20/89	Chuey, J., Maecorp, Inc.	Walker, F., Canton Analytical Lab., Inc.	Sampling Results	27
09/19/91	Ullrich, D., U.S. EPA	Stoll, R., Freedman, Levy, Kroll, Simonds	Administrative Order By Consent	103
00/00/00	Bowlus, R., U.S. EPA	Ullrich, D., U.S. EPA	Action Memorandum	

TEXTILE ROAD

ATTACHMENT 3

ACTION MEMORANDUM
AUGUST, 1988

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: AUG 8 1988

SUBJECT: ACTION MEMORANDUM - Request for Removal Action at the Holtzman-Silverman Site, Ypsilanti, Michigan (Site Spill ID #AMY)

FROM: Peter D. Neithercut, On-Scene Coordinator
Emergency Response Branch

TO: Basil G. Constantelos, Director
Waste Management Division

Mary A. Gade, Acting Associate Division Director
Office of Superfund

PURPOSE

The purpose of this memorandum is to request approval to expend up to \$55,750 to initiate an extent of contamination sampling at the Holtzman-Silverman site. This study will require an estimated five on-site working days to complete.

BACKGROUND

The Holtzman-Silverman site is a former gravel pit located south of Ypsilanti, Michigan, in Ypsilanti Township, Washtenaw County. The 62-acre site is generally flat with only one small building. There are two large ponds on the site. The native soil is classified as Fox Sandy Loam.

The owners of the property allowed the dumping of fill material in areas previously excavated; during the gravel pit operations, to keep the property above the shallow water table. This material included wastes from local industries.

Nearby residents use the site for recreation. Fishermen use the large ponds for fishing. A large portion of the site is used as a track for off road vehicles. Other areas appear to be used for picnics and parties.

On October 27, 1987, United States Environmental Protection Agency (U.S. EPA) Field Investigation Team (FIT) and a representative of the Michigan Department of Natural Resources (MDNR) visited the Holtzman-Silverman site. The team observed an estimated 13 drums of unknown materials and an area with soils highly saturated with an oil like substance.

On June 29, 1988, the U.S. EPA Technical Assistance Team (TAT) and U.S. EPA On-Scene Coordinator Peter D. Neithercut visited the Holtzman-Silverman site to perform a site assessment. Surface samples confirmed the presence of Polychlorinated Biphenyls (PCB) contamination above 50 parts per million (ppm). Depth sampling was not possible due to an asphalt like layer at a depth of 4 inches. Samples from this hard layer showed 116 ppm PCB's. It will be necessary to use heavy equipment to penetrate this layer and determine the vertical extent of contamination.

This site is not on the National Priorities List (NPL).

THREAT

This facility presents an immediate and substantial threat to human health and the environment. As outlined in the National Contingency Plan (NCP), 40CFR300.65(b)(2), the following criteria are met by the Holtzman-Silverman site:

- 1) Actual or potential exposure to hazardous substances or pollutants or contaminants by nearby populations, animals, or food chain;

Access to the site is not restricted. There are vehicle tracks throughout the site. A temporary fence erected by the MDNR to isolate a contaminated area has been driven over by off road vehicles. Local residents have been observed fishing in the two large ponds on the site.

- 2) Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release; and,

Thirteen abandoned drums have been discovered on-site. An inspection of these drums showed they contain varying amounts of unknown material. It also showed that the drums were dented, bent, rusted, and several were open or had ruptured.

- 3) High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface, that may migrate.

Analytical results from samples taken in the contaminated area show PCB's in the range of 120 ppm. This contaminated loose fill was placed on top of the native sandy loam soils. There is a potential for this material to migrate, via groundwater or surface run-off, into the ponds on-site exposing the entire water shed. This potential is demonstrated by the level of 2 ppm PCB's found in a sample taken from the pond sediments.

ENFORCEMENT

See the confidential enforcement information in Attachment I.

PROPOSED PROJECT AND COST

The objective of this removal action is to conduct a study which will identify the lateral and vertical extent of contamination. The results of this study will be used to determine a method of site closure and generate a detailed cost estimate.

The following steps are proposed at the site:

- 1) Develop and implement site safety and security measures.
- 2) Implement an air monitoring program.
- 3) Develop an extent of contamination sampling plan.
- 4) Dig a series of trenches through the contaminated area.
- 5) Sample soils according to the sampling plan.

The estimated project costs are:

Cleanup Contractor	\$33,000
15% Contingency	5,000
Subtotal	<u>\$38,000</u>
TAT/TES	7,500
Extramural Subtotal	<u>\$45,500</u>
Extramural Contingency (15%)	6,825
=====	=====
EXTRAMURAL TOTAL	\$52,325
U.S.EPA Direct Costs	\$1,350
(41 Regional hrs + 4 HQ hrs x \$30/hr)	
U.S.EPA Indirect Costs	\$2,075
(41 Regional hrs x \$51/hr)	
=====	=====
INTRAMURAL TOTAL	\$3,425
PROJECT TOTAL	\$55,750

This action will require approximately 5 on-site working days to complete. It is anticipated that additional removal funds will be required to complete this action.

Due to the heavy recreational use of this area, this is a time critical action. This action is necessary to plan for further action and is consistent with any long-term remedial action that may be necessary.

RECOMMENDATION

Because the conditions at the Holtzman-Silverman site in Ypsilanti, Michigan, meet the NCP Section 300.65 criteria for a removal action, your approval of this request is recommended. The estimated total project costs are \$55,750, of which up to \$44,825 (\$33,000 line item, plus \$5,000 contingency, plus up to \$6,825 of extramural contingency) could be used for extramural cleanup contractor costs. You may indicate your decision by signing below.

APPROVE: *M. A. Hon*
Director, Waste Management Division

DATE: 2/8/88

DISAPPROVE: _____
Director, Waste Management Division

DATE: _____

Attachment

TEXTILE ROAD

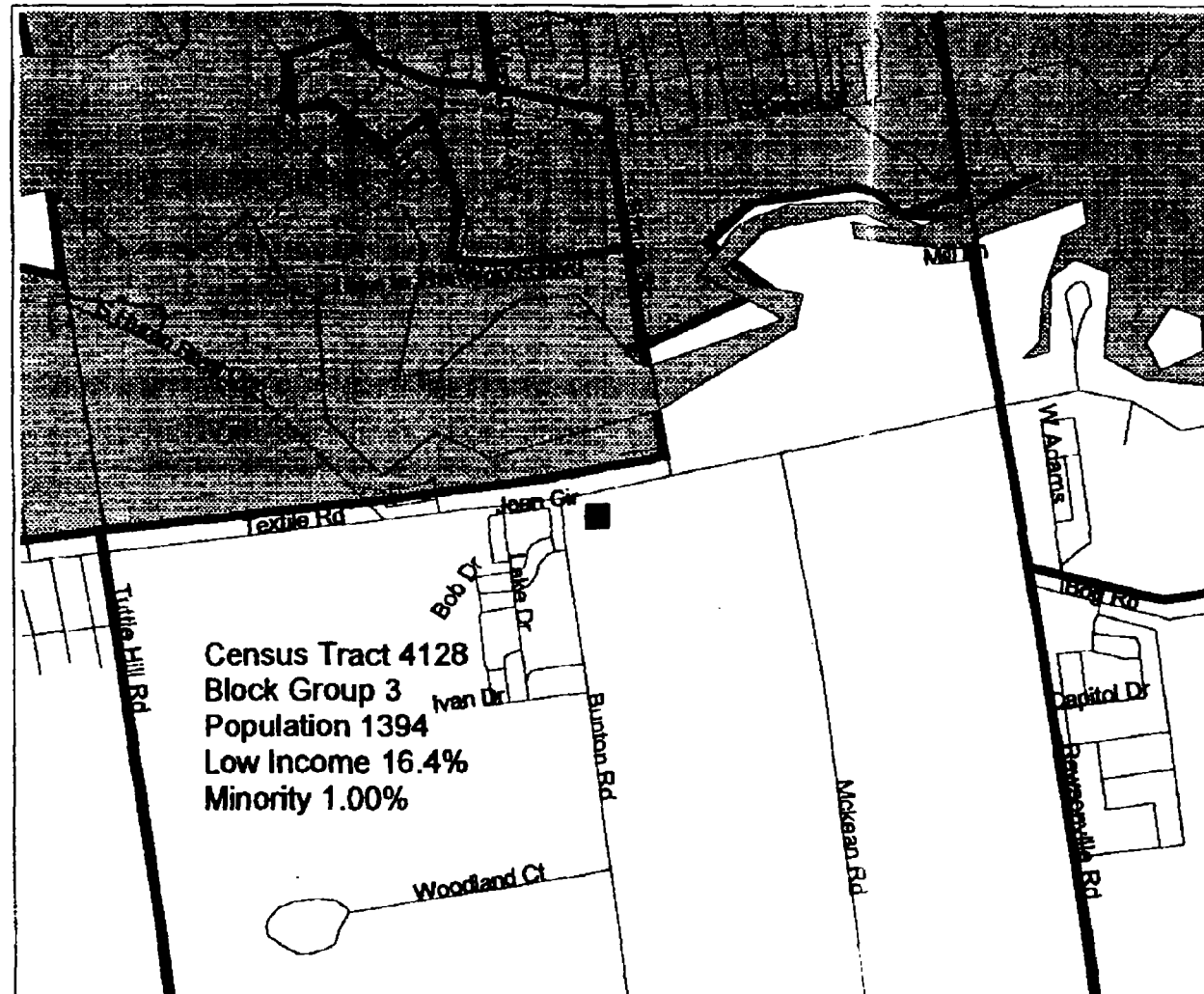
ENFORCEMENT ADDENDUM
AUGUST, 1988

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NOT RELEVANT TO THE SELECTION OF REMOVAL ACTION

Region 5 Superfund EJ Analysis

Textile Road Site Ypsalanti Township, MI



EJ Identification

- Low Income and Minority Less than State Average
- Low Income or Minority at or Greater than State Average
- Low Income or Minority 2 Times or Greater than State Average
(meets Region 5 EJ Case criteria)
- Site Location
- Block Group Boundary

Region 5 EJ Case Criteria for Michigan
Minority: 36% or greater
Low Income: 58% or greater



U.S. EPA Region 5
Superfund Division



Date of Map: 9/1/89

Source of Map: 1980 Census Database