Attachment III

Individual Site-Specific Summaries

Region 1: 3 facilities

Raymark Industries, CT

CTD001186618

- Proposed to NPL on 1/18/1994; Listed on NPL – Final on 4/25/1995
- CERCLA Expenditures: $108,467,268.
- Asbestos Part Manufacturing: Raymark Industries manufactured automotive brakes, clutch parts, and other friction components at the facility from 1919 until 1989.
- The contaminants consisted of PCBs, dioxin, semi-volatile and volatile organic compounds, asbestos and metals.
- Pre and early RCRA Waste Management: Asbestos and PCBs were major waste streams. Lagoon storage of waste occurred from 1919 to 1984. Wastes were also used for fill at the site and the neighboring community. Several wetland areas in close proximity to the Housatonic River were also filled in with Raymark's manufacturing waste.
- SF Referral: The facility was referred to Superfund because it had an unwilling owner/operator who went bankrupt and there was widespread and uncontrolled contamination (large Corrective Action burden) due to disposition of contaminated materials from 1919 to 1989.
- Remediation: In 1992 and 1993, EPA conducted removal actions to excavate contaminated soils at the site and at a number of residential properties where the presence of Raymark waste presented health threats. EPA also installed a temporary cap on a portion of the commercial property in 1992. In 1995, EPA started remediation at the site by demolishing structures and placing an impermeable cap over wastes left at the facility. Excavation activities were completed in the fall of 1995 and property restoration continued into 1996.
- Bankrupt: Filed for bankruptcy in 1989. It is the general understanding of the Region that the reason for the bankruptcy was the costs associated with the asbestos litigation (the facility manufactured brake pads containing asbestos.)
- **Financial Assurance:** Raymark had a Trust Fund which covered regulated units at its facilities in CT, PA, and IN. Region 1 recaptured $620,000 from the trust fund for cleanup costs. Financial Assurance for Corrective Action at SWMUs was not in place.
- RCRA Waste Management Activities: Submitted a Part A application in 1980. Two surface impoundments (one a Storage unit and one a Treatment unit) operated under interim status until 1985 at which time they lost interim status and

were referred to SF. One container storage unit also operated under interim status until 1992, at which time it stopped receiving hazardous waste, lost interim status, and was referred to SF. The three units lost interim status since Raymark never submitted permit applications. Three other storage and treatment units (one tank storage unit, one tank treatment unit, and one incinerator treatment unit) never managed hazardous waste and were never regulated as TSDs. (They were protective filers.)

- Brownfield site: Following EPA cleanup activities in 1997, the property was successfully sold at auction in 2000. Construction of the Stratford Crossing Shopping Center began in 2001 and opened for retail business in 2002.
- Cost Recovery: $25,920,919 in total, including $20,010,715 recovered by Superfund, and $5,910,204 reimbursed to the State. These numbers reflect collections made through the end of FY 2004.

GE – Housatonic River, MA
MAD002084093

- Proposed to NPL on 9/25/1997; Not Listed
- CERCLA Expenditures: $53,402,699.
- Plastics, Munitions, and Transformer Manufacturing: General Electric began its operations in 1903. The activities of the Transformer Division, including the construction and repair of electrical transformers using dielectric fluids, some of which contained PCBs, were one likely significant source of PCB contamination.
- Pre RCRA Waste Management: From 1932 through 1977, releases of PCBs reached the waste and storm water systems and subsequently discharged into the Housatonic River.
- Remediation: An EPA management decision was made to move this cleanup from RCRA to Superfund. Regulators weren't having any success getting the facility to cleanup under RCRA because of the large PCB river sediment issue. Comprehensive remediation and restoration of the GE-Pittsfield/Housatonic River Site is being performed pursuant to an October 27, 2000 court-ordered Consent Decree. The Consent Decree memorializes the agreement by GE to perform and/or pay for virtually all soil and river cleanup. The cleanup is taking place under a RCRA Consent Decree. The site is being managed by the Superfund program and a portion of the river cleanup of the site was performed as a Superfund Removals program action. The uppermost ½ mile stretch, an area of extremely high contaminant concentration where many of the historical direct discharges most likely occurred, was cleaned up by GE under EPA supervision. The next 1 ½ mile stretch is being cleaned up by EPA as a removal action, with funding being shared between GE and EPA. GE is responsible for cleaning up the Rest of River segment (below the initial two miles) under a RCRA Consent Decree.
- Bankrupt: No.
- **Financial Assurance:** Yes – GE provided financial assurance for all regulated units with Trust Funds. The Financial Assurance is still in place.
- RCRA Waste Management Activities: The facility submitted a Part A in 1980. One container storage area was permitted in 1995 and continues to operate, while one tank storage area had its permit terminated in 1992, when it was clean closed. One surface impoundment disposal unit closed under interim status and has been inactive since 1990, though it has not yet RCRA closed. Another container storage unit was permitted in 1995 and subsequently clean closed in 2001, after the permit was terminated. One incinerator unit operated under interim status at the facility until 1995; in 1997, it lost interim status and clean closed. It is unclear if the state actually terminated interim status of the incineration unit on that date rather than being a loss of interim status. Three other treatment units (tank treatment, incinerator, other treatment) never managed RCRA hazardous waste (never regulated / protective filers). They have a TCLP disposal impoundment for which there has never been a permit application or a closure process which it appears could be regarded as, but has never been captured as, a loss of interim status.

- Cost Recovery: $45,155,683, plus an additional $36,049,610 recovered for cleanup work funded from a special account (for a total of $81,205,293). These numbers reflect collections made through the end of FY 2004. (For financial tracking purposes, a separate site identifier (still under the same CERCLIS ID) was set up for a 1.5 mile stretch of the river whose cleanup work is being funded by a special account. The Superfund site-specific expenditures noted above ($53,402,699) were pulled from IFMS and do not include these special account funds. The additional $36,049,610 in cost recovery was collected from GE to reimburse EPA for remediation work funded by the special account. Since the Superfund site-specific expenditures do not contain special account money, this $36,049,610 is noted separately from the $45,155,683 that was recovered from the $53,402,699 expenditure figure noted above.)

Nuclear Metals, MA
MAD062166335

- Proposed to NPL on 7/27/2000; Listed on NPL – Final on 6/14/2001
- CERCLA Expenditures: $ 3,456,624.
- Also known as Starmet Corporation.
- Metal Manufacturing: Starting in 1958, Nuclear Metals produced depleted uranium products, primarily as penetrators for armor piercing ammunition. They also manufactured metal powders for medical applications, photocopiers, and specialty metal products, such as beryllium tubing used in the aerospace industry.
- Threats and contaminants included VOCs, and uranium and thorium and metals.
- **The principal contaminant at the site is depleted uranium.**
- Pre and early RCRA Waste Management: From 1958 to 1985, NMI discharged wastes to an unlined holding basin. Spent nitric acid pickling solution was collected, neutralized with a lime slurry, and then discharged to the holding basin. During the pickling process, "small quantities" of copper and uranium were dissolved in the nitric acid. NMI shut down the holding basins in 1985 rather than meet surface impoundment retrofit requirements; they began using an acid closed-loop recycling process. In addition to natural and depleted uranium (as elemental, oxide, and fluoride), NMI handled thorium and thorium oxide under license to the Nuclear Regulatory Commission (NRC). In March 1997, the company's license to handle source material (including depleted uranium, thorium, and thorium oxide) under the NRC was transferred to the Massachusetts Department of Public Health. On October 1, 1997, NMI was renamed Starmet Corporation.
- Remediation: In 1998, the facility conducted a partial cleanup of the site consisting of excavation and transportation off site of approximately 8,000 cubic yards of soil contaminated with depleted uranium and copper. In 2001, Starmet transported 1700 drums containing depleted uranium from its SC facility to the site. They had thousands of other drums of wastes stored at the site. Starmet is currently in violation of its MADPH radioactive materials license because it has failed to remove these stored drums of depleted uranium materials from the site and is therefore not allowed to process any radioactive material at the facility under their license. After Starmet indicated that it planned to cease operations or file for bankruptcy, the Commonwealth of Massachusetts obtained a preliminary injunction in state court in January 2002, requiring Starmet to continue to provide site security and necessary utilities.
- In March 2002, Starmet abandoned the property. The site was then referred to Superfund by the State of Massachusetts 21(e) program (the state Superfund program). The site really went from the State 21(e) program to Superfund, not from RCRA to Superfund.
- In June 2003, EPA negotiated an agreement with 5 potentially responsible parties including US Army, DOE, Whittaker Corporation, MONY Life Insurance Co, and Textron, Inc. for the performance of an RI/FS.

- Bankrupt: Starmet filed for Chapter 11 bankruptcy protection in April 2002.
- **Financial Assurance:** Since the RCRA regulated units were clean closed (as of 1992) and the facility subsequently converted to generator-only status, financial assurance was no longer required. It is unclear what mechanisms/amounts, if any, were initially used as financial assurance for the RCRA TSD units. The State had been relying on the financial assurance mechanism provided to MADPH under Starmet's radioactive materials license to provide for security at the site and necessary utilities, if needed.
- RCRA Waste Management Activities: Submitted a Part A application in 1980 for three storage and treatment units: container storage, tank treatment, and "other" treatment. All units lost interim status (the LOIS date is unclear). Massachusetts verified the three RCRA units clean closed in 1992, after which time, the facility dropped to Small Quantity Generator (SQG) status.
- Cost Recovery: None. Superfund had not recovered any funds from the facility by the end of FY 2004.

Region 2: 2 Facilities

LCP Chemicals, NJ

NJD079303020

- Proposed to NPL on 9/25/1997; Listed on NPL – Final on 7/28/1998
- CERCLA Expenditures: $716,117
- Chlorine-Alkali Manufacturing: Chlorine production facility which utilized a mercury cell electrolysis process to produce chlorine, sodium hydroxide, hydrochloric acid (HCL), and anhydrous HCL. The facility operated from 1942 to 1982. LCP Chemicals, Inc., a division of the Hanlin Group, Inc., purchased the 26-acre chlorine production facility in 1972 from GAF Corporation, who had owned and operated the facility since 1942.
- Pre and early RCRA waste management: From 1942 to 1982, mercury-tainted sludge was placed into the brine sludge lagoon (BSL), which received up to 20 tons per day of both brine sludge and wastewater treatment sludge. From 1972 through 1979, there were numerous releases of brine to a nearby creek. The 1979 discharge of sodium chloride brine contaminated the creek with mercury. The generation of brine ceased at the site in March 1982.
- Closure of the lagoon was completed in 1984.
- Remediation: Long-term remedial phase focusing on the cleanup of the entire site is underway by PRPs.
- Bankrupt: LCP Chemicals, Inc. is a division of the Hanlin Group, Inc., which filed for bankruptcy in July 1991.
- **Financial Assurance:** There is an active trust account with an $83,000 balance; LCP is delinquent and PNC Bank wants to release the funds to New Jersey. New Jersey has asked EPA Region 2 how to proceed.
- RCRA Waste Management Activities: Submitted a Part A Application in 1980 for a storage surface impoundment and a storage tank unit. In 1984, New Jersey inspected the facility, found no tanks present, and classified the storage tank unit as Never Regulated / Protective Filer. In 1985, the surface impoundment lost interim status and received a post closure permit in 1987. The HSWA Corrective Action part of the permit was issued in 1991. In 1997**,** the surface impoundment was referred to CERCLA for post-closure/clean-up activities.
- Cost recovery: This site is being addressed through PRPs. Closure costs were recovered.

Diaz Chemical, NY
NYD067532580

- Proposed to NPL on 3/8/2004; Listed on NPL – Final on 7/22/2004
- CERCLA Expenditures: $3,840,938
- Chemical Manufacturing: From 1974 to June 2003, Diaz manufactured and stored intermediate organic chemicals for the pharmaceutical, agricultural, photographic, color and dye, and personal care products industries. Diaz specialized in the production of halogenated aromatic compounds and substituted benzotrifluorides. Prior to its use by Diaz, the property was used for food processing and cider vinegar production from 1890 until 1974. After the June 2003 bankruptcy, all operations ceased and Diaz abandoned the site, leaving behind a multitude of chemicals in drums and tanks.
- Pre and early RCRA Waste Management: Diaz has had a long history of sloppy waste management practices and releases to the environment from its facility. A nitric and sulfuric acid release in January 1977 caused eye and skin irritation in affected residents. Other compounds that were spilled to the ground or released to the air between 1977 and 1999 included herbicides, process water and sludge, and numerous halogenated organic compounds. In January of 2002, a non-permitted air release from a reactor vessel in a process building discharged about 75 to 80 gallons of a mixture of toluene, water (steam), and 2-chloro-6-fluorophenol (CFP) into outdoor air. This contaminated surfaces in the nearby neighborhood, and people complained of acute health effects such as sore throats, headaches, eye irritation, nosebleeds, and skin rashes.
- Remediation: EPA has removed 2400 drums and 40,000 gallons of bulk chemicals from the site. Residents dislocated from their homes following the January 2002 chemical release continue to receive relocation assistance from EPA.
- Bankrupt: Diaz Chemical declared bankruptcy and abandoned the facility in June 2003.
- Converted: Interim Status TSD which converted to / reclassified as a Generator (Generator-only status under the 90 Day accumulator provision). The change was approved by NYSDEC in December 1986.
- **Financial Assurance: Not Required.** Diaz no longer needed to provide financial assurance after its conversion to Generator-only status (1986). It is unclear whether or not this site ever maintained financial assurance (pre-1986).
- RCRA Waste Management Activities: Two hazardous waste units are listed in RCRAInfo: a Container Storage Area and a Tank Storage Unit. Submitted a Part A Application in 1980 for a Container Storage Area. It is not clear when the Part A was submitted for the Tank Storage Area. In 1986, New York approved these units converting to less than 90-day storage units. It is not certain when the closure, post-closure, and clean-up of these units was referred to CERCLA.
- Cost Recovery: The region is trying to obtain information from the Regional Superfund program on Cost Recovery of possible remaining RCRA FA funds (in the case that any FA was provided pre-1986).

Region 3: 1 Facility

Sharon Steel, PA
PAD001933175

- Proposed to NPL on 3/6/1998; Listed on NPL – Final on 7/28/1998
- CERCLA Expenditures: $ 3,347,911
- Steel Manufacturing: The Sharon Steel Corporation Farrell Works manufactured steel at the facility since about 1900. The SSC plant operated from 1900 until its 1992 bankruptcy, forging quality hot- and cold-rolled carbon and alloy steel products.
- The NPL site consists of the Farrell Works Disposal Area. This is the non-contiguous dumpsite area where the old Sharon Steel operating facility used to dispose of slag and other wastes. This slag area was deferred to CERCLA because the Sharon Steel Company was in bankruptcy, having financial troubles related to the improper behavior of its owner. Since there was interest in mining the slag and restoring the wetlands area, the site was ranked and put onto the NPL to provide parties interested in mining the slag some comfort that they would not become PRPs (and would thus not be held liable for past environmental contamination) as a result of their potential actions (this was pre-Brownfields).
- The former SSC manufacturing plant is not currently being considered part of the NPL site because this area is being addressed separately under the oversight of PADEP. The current owner and operator of the manufacturing facility, Caparo Steel Company, entered into a consent order and agreement with PADEP in 1994 to eliminate all imminent and substantial threats to public health and the environment posed by the facility.
- Pre and early RCRA Waste Management: Starting around 1900, Sharon Steel Corporation stored and disposed of wastes, slags (blast furnace slag, electric arc furnace slag, and basic oxygen furnace slag), and sludge at the disposal area. From 1949 to 1981, millions of gallons of spent pickle liquor acid, sulfuric acid, hydrochloric acid, and chromic acid rinse were dumped over the slag. The basic oxygen furnace sludge, along with demolition debris, was disposed of in an unpermitted landfill until 1983. Groundwater near the acid-slag area contains elevated levels of metals. Soils adjacent to the acid-slag disposal area are contaminated with metals and PCBs.
- Remediation: The EPA and Pennsylvania are currently reviewing cleanup options for the Site. Phase 1 of the remedial investigation was started in September 1999, and was completed in April 2001. Phase 2 of the RI was completed from August 2002 to May 2003.
- Bankrupt: Sharon Steel filed for Chapter 11 bankruptcy protection twice – first in April 1987, and then again in November 1992.
- **Financial Assurance: There was no RCRA financial assurance required for this non-contiguous portion of the plant as no RCRA activities took place there.** The contaminants of concern were historical in nature. As for the operating plant, the state took several enforcement actions in an attempt to get

Sharon Steel to comply with RCRA TSD requirements, including financial assurance for a waste pickle liquor treatment/disposal process. Those state actions were essentially stopped by the bankruptcy and the result was that PADEP and Caparo Steel reached a consent agreement to take care of and remediate the environmental issues at the facility.

- RCRA Waste Management Activities: Submitted a Part A application for one treatment unit (it is unclear when this was submitted). This unit operated under Interim Status and converted to activities not requiring a RCRA permit in 1981. In 1998, the unit (which was state regulated) was referred to CERCLA for closure/post-closure care/clean-up.
- Cost Recovery: No. Due to the latest bankruptcy, EPA has not been able to recoup any cleanup costs from Sharon Steel.

Region 4: 11 Facilities

National Southwire Aluminum Company, KY
KYD049062375

- Proposed to NPL 7/29/1991, Listed on NPL – Final on 5/31/94
- CERCLA Expenditures: $ 960,188
- Aluminum Smelter: National Southwire Aluminum (NSA) Co. began aluminum reduction operations in 1969. Alumina ore was smelted to produce aluminum ingots. The facility consists of a large main refining facility, four disposal ponds, and a refractory brick disposal area.
- Pre and early RCRA Waste Management Activities: Two clay-lined ponds were constructed for disposal of spent pot linings from the aluminum reduction process and the calcium fluoride slurry from the air quality control. One pond was closed in 1986 and the other pond was closed in 1989. A third, synthetically-lined pond, designated as the New Pond, is now used for disposal of the calcium fluoride slurry.
- Remediation: During 1991, NSA, the State, and EPA detected PCBs in subsurface soils near a cooling tower on the main facility, and also in soils at the refractory brick disposal area. In February 1992, under State supervision, NSA hauled 850 cubic yards of PCB-contaminated soils to an EPA-approved hazardous waste facility. A USEPA/State Consent Decree was completed in 1994 required NSA to design, construct, and operate a ground water extraction and treatment system to remove cyanide, fluoride, and heavy metals and to discharge the treated water to the River via a Kentucky Pollutant Discharge Elimination System (KPDES) permit. The million dollar ground water treatment plant will continue to operate until concentrations of contaminants in the aquifer are consistently below standards set by the Commonwealth of Kentucky and USEPA. An EPA AOC was completed in October 1995 for a non-time critical removal action at the Old South Slurry Pond. NSA began closure construction of the Pond in the spring of 1996 and work was completed in the summer of 1997.
- Bankrupt: No.
- **Financial Assurance: Not required**
- RCRA Waste Management Activities: Non-notifier/illegal Storage waste pile unit discovered in 1989. Submitted a Part A application (which was received in 1990) for the waste pile. In 2001, Kentucky determined that the waste pile was not subject to RCRA permitting and it was referred to CERCLA for closure and clean-up.
- Cost Recovery: There has been a referral to DOJ. Presently, they are negotiating a Consent Decree for past and future costs.

Escambia Wood, FL
FLD008168346

- Proposed to NPL on 8/23/1994; Listed on NPL – Final on 12/16/1994
- CERCLA Expenditures: $ 30,593,223
- Wood Treatment: Escambia Treating Company (ETC) was a 26 acre wood preserving facility that operated from 1942 until its closing in 1982. Coal tar creosote was used from 1942 to 1970. Pentachlorophenol dissolved in diesel fuel was used starting in 1966 until 1982. From 1970 until operations ceased in 1982, PCP was the only preservative in use at the facility.
- Pre and early RCRA Waste Management: Contaminated wastewater and runoff from the former treatment area were the primary wastes managed at the facility. In the early years of operation, all wastewater was sent to an unlined impoundment. After the mid-1950s, process wastewater and contaminated runoff were managed by two separate systems: process wastewater was sent to an oil/water separator to recover treating chemicals and process water for reuse in the wood-treating process; contaminated runoff from the treatment area was directed into a runoff collection/separation system.
- SF Referral: According to the State of Florida, The facility was referred to Superfund for a variety of reasons, including bankruptcy, unwilling owner/operator, widespread uncontrolled contamination, closure issues, financial assurance failure (however there were no specific details on whether there were any issues with the actual mechanism, from which money indeed seemed to have been recovered).
- Remediation: During 1991 and 1992, EPA excavated 225,000 cubic yards of contaminated materials that is currently stockpiled under a secure cover on-site. In June 1995, this site was used as a pilot for the National Relocation Evaluation Pilot. In February 1997, EPA issued a ROD which proposed to relocate the approximately 358 households living near the SF site. Approximately 51 vacant residential structures have been demolished near the site as of April 2004.
- Bankrupt: Filed for bankruptcy in 1991 and abandoned the site.
- **Financial Assurance:** Yes. According to the State of Florida, a Trust Fund was in place to cover the Regulated Unit (which is an area of 3 Surface Impoundments). At the time of the NPL Proposal (1994), the facility would not have passed the Financial Test. $108,328 has been drawn from the trust fund to address environmental issues. Financial Assurance for Corrective Action was not in place.
- RCRA Waste Management Activities: Submitted a Part A application in 1980 for a surface impoundment storage area. (According to the State of Florida, the Part A was submitted in 1984; however, this differs from the 1980 date which comes from the NPL Site Description. RCRAInfo did not include information on the Part A submittal for this site. Also, Florida refers to each impoundment as a separate unit, while RCRAInfo only shows one unit.) This area stopped receiving waste in 1982. There is no record of a RCRA Part B application for the facility. In 1986 the Florida Department of Environmental Regulation (FDER)

determined that the backfilled surface impoundment was an unpermitted disposal area not regulated under RCRA. In 1990, a RCRA Facility Assessment was conducted at the facility, but the facility is no longer classified under RCRA. According to the State of Florida, the three surface impoundments Lost Interim Status when they could not submit all necessary information including Financial Assurance and Cost Estimates, and had to declare Bankruptcy. The facility was referred to CERCLA, for post-closure/clean-up activities (although the date of the referral is uncertain).

- Cost Recovery: The case has been referred to DOJ, and they are presently negotiating a Consent Decree for past and future costs. According to the State of Florida, $6,500 was recovered through a recent judgment.
- Cost Sharing: Of the expenditures incurred by EPA and the Florida Department of Environmental Protection (DEP), EPA is paying about 90% of the costs, while the State is bearing about 10%.

Aqua-Tech Environmental, SC
SCD058754789

- Proposed to NPL 08/23/1994; Listed on NPL – Final on 12/16/1994
- CERCLA Expenditures: $ 1,927,901
- Waste Management: Aqua-Tech Environmental, Inc. is a closed RCRA treatment, storage, and disposal facility. From approximately 1940 until 1968, the property was used as a Municipal Solid Waste Landfill (MSWLF). Beginning in 1974, Groce Laboratories operated a hazardous waste treatment, storage, and reclamation facility over the former landfill site. Aqua-Tech Environmental, Inc. purchased the operations in 1987 and continued to accept, store, and treat hazardous wastes as well as a variety of other solid wastes. Both Groce Laboratories and Aqua-Tech Environmental, Inc. operated under RCRA Interim Status.
- Remediation: From 1991 to 1992, South Carolina Department of Health and Environmental Control (SCDHEC) and EPA emergency response personnel discovered approximately 7,000 drums and lab packs, 97 above-ground tanks, 1,200 gas cylinders (some containing phosgene and other toxic gases), unexploded ordinance material, and small amounts of low-level radioactive material and biohazard material at the site. South Carolina conducted emergency stabilization activities. In 1992, EPA continued site stabilization measures and containerized wastes were removed/treated until 1994.
- Bankrupt: Yes – Aqua-Tech filed for bankruptcy in October 1991.
- **Financial Assurance:** It is unclear whether or not this site ever maintained financial assurance.
- RCRA Waste Management Activities: Submitted Part A application; Part A received in 1990 (this is the date given in RCRAInfo but is most likely a data entry error) for container and tank storage area units, and tank treatment and other treatment type units. The Part B application was called-in by South Carolina approximately in 1985. In 1991 the permit was denied for all waste management operations. After several complaints, RCRA inspection violations, and on-site accidents, Aqua-Tech Environmental, Inc. was ordered closed by South Carolina due to the large volume of improperly stored hazardous waste and the imminent threat to public health. Interim status for the facility was terminated and the facility was referred to CERCLA in 1991 for closure/clean-up/post closure activities.
- Cost Recovery: $1,736,884, which has probably increased. According to a 1997 South Carolina Department of Health and Environmental Control (DHEC) report, $1,736,884 of $2,400,000 was recovered at Aqua-Tech, representing 72.6% recovery (the $2.4 Million figure is probably a mid- or late-1990s clean-up estimate). This figure may have increased due to other agreements and actions designed to increase the amount recovered. According to the Region, the PRPs have recently (in 2005) entered into a Consent Decree for the RD/RA.

LCP Chemicals Georgia, Inc., GA
GAD099303182

- Proposed to NPL 10/2/1995; Listed on NPL – Final on 6/17/1996
- CERCLA Expenditures: $ 6,667,200
- Chlorine-Alkali Plant/Refinery/Power Plant/Paint Manufacturing: The site was originally owned and operated by the Atlantic Refining Company (ARCO) who operated a petroleum refinery from 1919 until 1930. Portions of the site were also owned by Georgia Power Company which operated an oil-fired power plan from 1937 to 1950. Dixie O'Brien Paint and Varnish Co. operated a paint manufacturing facility on part of the site from 1941 into the 1950's. In 1955, the entire property was purchased by Allied Chemical, Inc., who manufactured caustic soda, chlorine, and hydrochloric acid by the electrolysis of sodium chloride using mercury cells. In 1979, LCP Chemicals purchased the property and continued the process practiced by Allied Chemical until 1994.
- Pre and early RCRA Waste Management Activities: Waste from the ARCO refinery was treated, stored, and disposed on-site from 1920 to 1937. From 1955 until 1968, waste sludges containing mercury produced by Allied Chemical were sold to an off-site reclaimer. From 1968 until the facility was sold to LCP Chemicals, several hundred to several thousand tons of contaminated sludge were disposed of in on-site surface impoundments. The site is heavily contaminated with a co-mingled combination of mercury, PCBs, dioxin, lead, and numerous organic compounds.
- Remediation: By mid-1995, 150 tons of mercury were recovered from the site. To date, 25,000 tons of contaminated soil have been excavated and shipped off-site.
- In 1999, Christian A. Hansen former chairman of the board of Hanlin Group; Randall W. Hansen former treasurer of the Hanlin Group; and Alfred R. Taylor former plant manager at the LCP facility in Brunswick were convicted on one count of conspiring to violate the Clean Water Act, the Resource Conservation and Recovery Act and the Comprehensive Environmental Response, Compensation, and Liability Act.
- Christian A. Hansen was sentenced to serve nine years in prison and pay a $20,000 fine. This is the longest federal prison term handed down for environmental crimes. Alfred R. Taylor of Brunswick was sentenced to six and one-half years in prison.
- Bankrupt: LCP Chemicals, Inc. is a division of the Hanlin Group, Inc. which filed for bankruptcy in July 1991.
- **Financial Assurance:** Financial Assurance was no longer required for the 2 treatment units after they converted to less than 90-Days Storage in 1985. It is unclear whether or not this site ever maintained financial assurance (pre-1985 or after the 1990 discovery of 4 illegal/non-notifier disposal units).
- RCRA Waste Management Activities: Submitted Part A in 1980 for two treatment units (one tank treatment, one other treatment). In 1985, LCP requested

withdrawal of application stating it will go to 90 day storage. Georgia approved this request in 1985, determining that these units were less than 90-day storage/treatment tanks and not subject to permitting. In 1990, Georgia determined that LCP Chemicals illegally disposed of hazardous waste in four surface impoundments. In 1990, this unit was referred to CERCLA for closure/clean-up/post closure care.

- Cost Recovery: The PRPs are paying the oversight bills for the RI/FS.

Brunswick Wood Preserving, GA

GAD981024466

- Proposed to NPL on 12/23/1996; Listed on NPL – Final on 4/1/1997
- CERCLA Expenditures: $ 11,906,232
- Wood Treatment: The site began operating as the Escambia Treating Company in 1958 and was sold to the Brunswick Treating Company in 1986 (the sale did not include one surface impoundment). Wooden poles and pilings were treated with creosote, solutions of pentachlorophenol (PCP), or chromated copper arsenate (CCA). Wood treatment at this facility occurred from 1958 until 1991.
- The property is 50 acres and contains process buildings, administration offices, railroad spurs, treatment, storage and disposal units, and tank storage facilities.
- Pre and early RCRA Waste Management: The facility's on-site waste management consisted of two wood treating process areas and a four-acre water-containing surface impoundment. There were also four buried impoundments and a treated pole storage area. Brunswick treated wood products with creosote, PCP, and CCA; these wood products were then dried in drip tracks and stored in treated wood storage areas prior to shipment. The creosote and PCP pressure treatment process created a large amount of wastewater, which was treated on-site in surface impoundments prior to its release to local surface waters. Neither the process areas, the drying tracks, nor the storage areas were underlain with concrete slabs, and as a result, wood preservatives and spent wastewater were released to surrounding soil.
- Remediation: In 1991, EPA initiated a removal action that included demolition of the CCA process area, the construction of cells for staging excavated soil, and the excavation of the soil underlying a creosote/PCP impoundment to the west of the creosote/PCP process area. EPA stored more than 127,000 tons of excavated contaminated soil in four onsite lined and covered cells.
- Bankrupt: Declared bankruptcy in 1991 and the site has been abandoned since then.
- **Financial Assurance: Financial Assurance was either inadequate or non-existent.**
- RCRA Waste Management Activities: Despite the waste process areas and surface impoundments, RCRAInfo shows no record of any RCRA waste management activities requiring a permit. The Region was unable to provide a process unit and/or permitting history for this facility (i.e., dates of Part A and B submittals and historical legal and operating statuses of each unit), possibly due to the historical nature of the facility's operations.

Ross Metals, TN

TND096070396

- Proposed to NPL 12/23/1996; Listed on NPL – Final on 4/1/97
- CERCLA Expenditures: $ 9,990,564
- Lead Smelter/Battery Recycler: Ross Metals operated as a secondary lead smelter from 1979 to 1992. Refined alloys were manufactured from lead-bearing scrap materials. Automotive and industrial batteries accounted for approximately 80 percent of the raw material processed. The other remaining 20 percent consisted of other lead-bearing materials such as lead plates, lead oxide, scrap metal and other lead waste from various business and industry. The spent batteries were cut open and the lead plates were melted and cast into lead ingots for resale. Processes included not only the smelting of lead and other scrap metals, but a variety of other products such as crushed drums, limestone, steel, and cast iron, which were added to create flux.
- Pre and early RCRA Waste Management Activities: Wastewater used for battery breaking operations was managed by an on-site wastewater treatment system. Sludge resulting from the neutralization process was collected in settling tanks and recycled into the blast furnace with other lead scrap. Sludge-free effluent was discharged to a POTW. From 1979 until 1988, blast furnace slag was disposed of in an on-site landfill. History suggests that wastewater discharge, as well as waste run-off, was collected in the northeast portion of the facility and discharged into the wetland area north/northeast of the site.
- Remediation: In 1994, EPA removed approximately 4,400 gallons, 170 tons and 1,700 cubic yards of waste. In 2001 EPA began further cleanup at the site that included demolition of most of the on-site buildings; excavation and stockpiling of contaminated soil, sediment and slag; and off-site disposal of scrap metal.
- Bankrupt: In 1992, Ross Metals, Inc. received an Administrative Dissolution under Articles of Incorporation.
- **Financial Assurance:** It is unclear whether or not this site ever maintained financial assurance.
- RCRA Waste Management Activities: Submitted a Part A application in 1980 for a storage tank and a treatment tank. At various times from 1985 to 1990, the facility submitted Part A changes under interim status for different units. In 1987, submitted a part A application change to add a container storage area for battery cases. This unit was permitted in 1990. This permit was terminated in 1993 and the facility was referred to State Superfund for closure/clean-up/and post closure In 1986, Ross Metals submitted a petition for registration for an existing industrial landfill used to dispose of blast furnace slag as non-hazardous industrial waste. EPA's determine that the slag was in fact hazardous waste and denied the variance in 1990.
- Cost Recovery: Superfund Cost Recovery negotiations took place from 8/23/01 to 9/16/02 (noted in CERCLIS). The *de minimis* settlement has been completed.

Camilla Wood Preserving, GA
GAD008212409

- Proposed to NPL 3/6/1998, Listed on NPL – Final on 7/27/1998
- CERCLA Expenditures: $ 3,684,917
- Wood Treatment: The facility began operations in 1947 as the Louis Wood Preserving Company. The Escambia Treating Company purchased the plant in 1950 and continued wood treatment processes using creosote. Subsequently, Camilla Wood Preserving Company took over operations at the facility. Wood treating operation ceased in 1991. Historically, the site has been used to treat wooden pole products, railroad ties, and other timber with creosote and pentachlorophenol (PCP).
- Pre and early RCRA Waste Management: Wastewater from steam treating of wood products, preservative recovery, and cleaning of drums, tanks, and storage areas was discharged to five surface impoundments. At a later, unspecified time, an onsite treatment system processed waste streams before discharging them to the City's wastewater treatment plant. In the 1960s, on-site drainage and some wastewater were discharged to two onsite injection wells. The wells reportedly were sealed in 1971. In 1982, stained soils from four of the surface impoundments were excavated and transferred to the fifth surface impoundment. The four impoundments were then backfilled.
- Remediation: In 1991, EPA conducted an emergency response action at this site: fence along the perimeter of the site, 95,000 gallons of wastewater was treated, and sludge in an onsite impoundment was solidified. In 1994, EPA treated an additional 52,000 gallons of onsite water and 30,000 gallons of PCP and creosote were removed from onsite tanks and shipped off-site. Elevated concentrations of anthracene, benzo(a)pyrene, naphthalene, pentachlorophenol, pyrene, and dioxins were detected in surface soils in the residential area and can be attributed to the surface impoundment at the Camilla Wood Preserving site.
- Bankrupt: Filed for Chapter 11 bankruptcy and ceased wood treating operations in February 1991.
- **Financial Assurance:** It is unclear whether or not this site ever maintained financial assurance.
- RCRA Waste Management Activities: Submitted a Part A application in 1980 for the storage surface impoundment area. The facility submitted a Part B application for operating these surface impoundments in 1983. Camilla sent in a Closure plan in 1985 and submitted another Part B application for post-closure care for these impoundments in 1986. Georgia denied the Post-Closure permit for these impoundments in 1988. Interim status was terminated and the facility was referred to CERCLA in 1996.

American Brass, AL
ALD981868466

- Proposed to NPL 1/19/1999; Listed on NPL – Final on 5/10/1999
- CERCLA Expenditures: $ 7,325,902
- Secondary Brass smelter/foundry: American Brass, Inc. operated from 1977 until 1992. Brass and copper-bearing scrap material were placed into the rotary furnaces and melted. The metal was cast into ingots and the remaining slag was further processed through the crusher and then into the ball mill. Brass particles were recovered from the crushed slag and reprocessed in the furnace.
- Pre and early RCRA Waste Management Activities: The slag was kept in storage bins, and baghouses collected emissions dust from the furnaces, crusher, and ball mill. The baghouse dust was sold as a finished product. Approximately 150,000 tons of heavy metal-contaminated furnace waste, ball mill residues, and furnace slag were stockpiled at the facility on the ground and in a large uncontrolled stockpile approximately one-third mile southeast of the facility. From approximately the mid-1980s until the facility closed, ABI found itself the subject of several RCRA enforcement actions, both state and federal, for RCRA violations including the on-site disposal of hazardous waste.
- Remediation: EPA conducted an emergency removal at the ABI site in 1996-1997. During this removal, excavated lead-contaminated soils and heavy metal-laden furnace bricks, as well as heavy metal-laden process waste materials (ball mill residue) found inside the buildings, were consolidated into a liner-covered waste pile at the site. In 1999 EPA removed the waste pile and disposed of the materials off-site.
- Remedial Investigation reveals impacts to onsite soils and sediments primarily from heavy metals, boron and PCBs. Impacts by these constituents were also noted to the surface waters and sediments of Cedar Creek leading away from the old ball mill residue pile location, as well as to the area of Dunham Creek.
- Bankrupt: No.
- **Financial Assurance:** It is unclear whether or not this site ever maintained financial assurance.
- RCRA Waste Management Activities: Alabama identified in 1986 one waste pile unit that failed to notify it was managing hazardous waste. From 1986 until the facility closed in 1992, ABI was subject of several RCRA enforcement actions, both state and federal, for RCRA violations including the disposal of hazardous waste without a permit. The unit certified clean closure in 1992, but Alabama has never verified the clean closure. Ground water issues associated with this unit are being addressed under CERCLA (/State Superfund – 2000).
- Cost Recovery: Cost Recovery is currently being pursued.

Macalloy Corporation, SC
SCD003360476

- Proposed to NPL 10/22/1999; Listed on NPL – Final on 2/4/2000
- CERCLA Expenditures: $ 763,629
- Chromium Smelter: The facility manufactured ferrochromium alloy by smelting chromite ore, coke, silica gravel and bauxite in electric arc furnaces. The facility operated from 1941 until 1998. At various times from 1942 to present, the U.S. Government (Defense Logistics Agency (DLA)) has owned, operated or otherwise used portions of the facility for the production of ferrochromium alloy. The facility ceased operations in 1998 due to market pressures from cheaper ferrochromium produced abroad.
- Pre and early RCRA Waste Management Activities: An estimated 80,000 tons of air pollution control material, consisting of electrostatic precipitator dust and gas conditioning tower sludge, is contained in an unlined surface impoundment (USI). A 20+ acre groundwater plume of hexavalent chromium exists below this surface impoundment. The facility also discharged surface water off-site to Shipyard Creek and adjacent wetland areas via a NPDES permit. Monitoring conducted at permitted surface water outfalls indicate the facility repeatedly exceeded permissible levels for total chromium, hexavalent chromium and total suspended solids (thus repeatedly violating its water permit).
- Remediation: In 1998, interim surface management controls were installed by Macalloy via a CERCLA Section 106 Removal Action Administrative Order on Consent (AOC) with EPA. This response action involved the consolidation of surface water discharge points by the construction of berms, diversion structures and detention basins to facilitate removal of solids from stormwater run-off prior to discharge. During the Fall of 1999, an estimated 40,000 tons of electrostatic precipitator dust in the surface impoundment was excavated, treated if necessary, and hauled to a RCRA Subtitle D landfill for disposal.
- Bankrupt: No.
- **Financial Assurance:** Yes. The facility maintained at least $900,000 in Financial Assurance, although the mechanism is unknown. $900,000 from the financial assurance mechanism was ordered to be used for remediation per DOJ Consent Agreement.
- RCRA Waste Management Activities: The facility submitted a Part A application, although the date of the submittal, as well as which units it covered, is unclear. The facility had two tank treatment units, a container storage area, and one disposal surface impoundment. The container storage area converted to less than 90 day storage in 1982. One of the tank units clean closed under interim status and South Carolina verified that it clean closed in 1995; it restarted as a less than 90-day storage tank. The other tank area operated under interim status until 1992 and then closed. Interim status was terminated for this tank in 2000 and this tank's clean-up and post-closure is being address under CERCLA. The disposal surface impoundment was identified as a non-notifier unit in 1995. A RCRA consent order was issued for closure of this unit in 1995/1996. In 2000, this unit's clean-up and post closure was moved to CERCLA.

- Cost Recovery: $300,000, plus $900,000 recovered from financial assurance mechanism, for a total of $1,200,000. A Consent Decree for past costs is complete. The PRPs are paying the cost. The DOJ consent agreement stated that Macalloy would pay for the cleanup with the $900,000 from the RCRA Financial Assurance funds (when available), as well as $300,000 in existing funds.

Alabama Plating, AL
ALD004022448

- Proposed to NPL 8/24/2000
- CERCLA Expenditures: $ 7,931,180
- Electroplating: The site is a former cadmium, copper, and zinc electroplating and hot-dip galvanizing facility that operated from 1956 to 1986. The Alabama Department of Environmental Management referred the site as an abandoned facility to EPA, and the facility was proposed for listing in August 2000.
- Pre and early RCRA Waste Management Activities: Wastes were initially discharged to adjoining receiving system. Subsequently wastewater was treated and discharged. An unlined retention lagoon received cooling, rinsing, and process wastewaters. Solids generated from these processes were allowed to settle in the lagoon and the remaining liquids were released via a NPDES permitted discharge.
- Historically, the site has been an environmental disaster. An unknown amount of galvanizing waste was deposited into a sinkhole in the ground that was covered up by the shell of an old automobile. There were, in fact, multiple sinkholes onsite, including some directly underneath the facility (covered up by floorboards), where wastes were disposed of. Those operating Alabama Plating would pour wastes into barrels, wait until they solidified, and then literally roll them out the back door of the facility and down a hill.
- In March 1986, ADEM ordered that all discharge of wastewater from the treatment system cease due to the facility's continued violations of permit conditions. Subsequently, ADEM ordered the Alabama Plating facility to cleanup the wastewater discharge ditch and install 21 monitoring wells to determine the horizontal and vertical extent of ground water contamination.
- Remediation: Beginning in 1998, EPA conducted a multi million dollar fund lead time critical removal action in which contaminated soil, sediment, and debris were removed, along with debris from various buildings; various buildings, including operational structures were also disposed during the removal.
- Bankrupt: No. According to Region 4, Alabama Plating is not bankrupt.
- **Financial Assurance:** Alabama Plating, Inc. had a $140,000 Letter of Credit, which was then used to back a $140,000 Trust Fund account. The Alabama Department of Environmental Management (ADEM) drew upon the Trust Fund for $40,000 (this amount had been placed with the court).
- In 1985, Alabama Plating received a letter of credit from First National Bank of Childersburg (owned by Childersburg Bancorporation, Inc.) for financial assurance for potential environmental cleanup. Alabama Plating was forced to demonstrate additional financial assurance – they did this by setting up a trust through FNBC, which was funded by the entire amount pledged in the LOC. After State cleanup, ADEM tried to access some of the funds held in the trust but were denied by FNBC, which maintained it did not have a valid LOC or trust agreement with Alabama Plating. After CBI sold FNBC (in 1999) to Marion Lowery and Peoples State Bank of Commerce ("Peoples"), disputes arose

between CBI and FNBC, prompting CBI to file a declaratory-judgment action against FNBC and Lowery. A settlement agreement set up an escrow account (which had a $140,000 ceiling) into which $40,000 was deposited that was to terminate on August 6, 2003. Per the settlement agreement, CBI was given full authority and absolute discretion to defend and/or settle any claim made by ADEM under the ADEM letter of credit. Peoples filed a complaint for interpleader (naming CBI and ADEM) stating it intended to comply with ADEM's payment demands and deposited the $40,000 with the court. CBI then issued a counterclaim against Peoples alleging a breach of the settlement agreement (since they had stated that FNBC had no right to comply with ADEM's demand). ADEM and CBI each moved for summary judgment, and each claimed the $40,000. The trial court then issued a summary judgment in favor of ADEM, who had claimed the $40,000 interpleaded funds. This judgment has been upheld by the State Supreme Court. CBI's counterclaim against Peoples is still pending.

- The $140,000 LOC was built into the sale price of the bank.
- The State of Alabama may own Alabama Plating Co.
- RCRA Waste Management Activities: Submitted Part A application (the date of this submittal is unclear) for three surface impoundment units (a Sludge Drying Bed, a Settling Lagoon, and an "Old Lagoon). The three units remained in operation until 1984 or 1985. These units closed with waste in-place during 1987-1988 and closure was verified by Alabama in 1992, at which time the facility was released from closure requirements. The three surface impoundments were Post-closure permitted in 1994 (this began the post-closure period), and the post-closure permit expired in 2004. The Post-Closure permit required Post-Closure Care and Corrective Action. There were also two other units – a landfill and an "other" treatment unit: In 1985, these failed to obtain Interim Status because of incomplete Part A applications and failures to submit closure plans. The "other" treatment unit converted to less than 90 day storage and the landfill applied for a post closure permit approximately in 1986. The landfill was issued a post-closure permit approximately in 1994. There were two modifications to the post-closure permit, one of which concerned financial assurance.
- Cost Recovery: In 1999, ADEM issued a letter to the Attorney General regarding Cost Recovery for Remediation expenditures. According to the Region, an insurance company is also being pursued.

Picayune Wood Treating Site, MS
MSD065490930

- Proposed to NPL 3/8/2004, Listed on NPL – Final on 7/22/2004
- CERCLA Expenditures: $ 2,739,960
- Wood Treatment: Timber and lumber related operations began in the early 1900's, but the wood treating operation most likely began around 1946. The Crosby Products Company treated yellow southern pine wood with creosote preservative chemicals. In 1973, Wood Treating, Inc. purchased the facility and continued to pressure-treat wood using pentachlorophenol until 1999. Utility poles and foundation pilings were the main products which resulted from the pressurized wood-treating processes.
- Pre and early RCRA Waste Management: Wastewater from treating of wood products was discharged to several unlined surface impoundments. Three older surface impoundments have been backfilled along with a former cooling pond. The three surface impoundments on the western portion of the facility property were in use up until the mid-1980s. The Mississippi Department of Environmental Quality (MDEQ) and U.S. EPA regulated the Wood Treating, Inc. facility under RCRA from 1981 to 1999. Several enforcement actions were issued to the facility during that time period.
- Remediation: EPA started a Removal Action in 1999 by treating approximately 400,000 gallons of wastewater and removing mercury and asbestos from the site. Twenty tanks and tanker cars were demolished, and approximately 309 tons of scrap metal were also removed. In addition, 1,500 cubic yards of creosote sludge were solidified and stockpiled. EPA completed the Removal Action in 2001.
- Bankrupt: Yes. According to Region 4, the facility is bankrupt. Wood Treating, Inc. went bankrupt in 1999. The facility ceased operations in 1999, closed down and "basically walked off and left the facility" without cleaning up any of the waste, treated poles, chemicals, or holding tanks.
- **Financial Assurance:** It is unclear whether or not this site ever maintained financial assurance.
- RCRA Waste Management Activities: Submitted a Part A application in 1980 for a surface impoundment disposal unit and two storage tanks. The facility decided to close the surface impoundment unit in 1984. A post-closure permit was issued to this unit in 1989, which expired in 1999. The unit was then referred to CERCLA for cleanup later that year. The facility failed to notify that the two storage tank units were managing hazardous waste. Mississippi verified that one of these units clean closed in 1992. The other tank is listed as being clean closed, but there are no details as to whether this also occurred in 1992 or if it clean closed at some other time. (It is uncertain whether Part A's were ever actually submitted for the two non-notifier storage tanks; perhaps this is a data entry error.)
- Cost Recovery: Currently an ATP (Ability To Pay) settlement is being pursued.

Region 5: 4 Facilities

US Smelter and Lead Refinery, IN

IND047030226

- Proposed to NPL 2/7/1992;
- CERCLA Expenditures: $ 198,821
- Lead Smelter: From about 1906 to 1920, a copper smelter operated on the property. Starting in 1920, USS Lead operated a primary lead smelter on part of the property. In 1973, USS Lead converted to secondary smelting, recovering lead from scrap metal and old automobile batteries. Operations stopped in 1985.
- Pre and early RCRA Waste Management Activities: Two waste materials were generated during smelting. The first was blast furnace slag, which was piled up and leveled off into what was a wetland. The second waste material was lead-containing dust which was emitted by the blast furnace stack; this was trapped in bag filters and stockpiled on-site for recycling or sale. In 1975, USS Lead received a permit under the National Pollutant Discharge Elimination System (NPDES) to discharge furnace cooling water and storm water run-off collected from the site to the Grand Calumet River. A second permit was issued in April 1985. Over the years, the permit levels for lead, cadmium, copper, arsenic, and zinc were frequently exceeded. Approximately four million people draw drinking water from intakes primarily into Lake Michigan, which is 15 miles downstream of where hazardous substances from the site enter surface water. In the 1980s, several State and Federal enforcement actions were taken against USS Lead for NPDES permit violations. In September 1985, the Indiana State Board of Health determined that USS Lead was in violation of State law because it was emitting lead particles into the air downwind of the site. In April 1990, IDEM adopted a Partial Interim Agreed Order requiring USS Lead to develop a cleanup plan for the site.
- Superfund Referral: Only the off-site portion of the cleanup was referred to Superfund. The reason was unwilling owner/operator and the presence of commingling lead sources. Under the Order, USS Lead completed interim measures addressing a large part of the onsite contamination, and conducted some partial off-site investigation (under Corrective Action) that uncovered an impact on residential areas (from former releases of lead into the air). This was later confirmed by additional data collected by EPA. USS Lead was unwilling to fully investigate and cleanup nearby residential areas. USS Lead has indicated that they are only responsible for their share of the lead contamination in the residential areas. There is commingling of lead contamination from other former industrial sources, including pre-CERCLIS screening lead sites. In 2004, the RCRA program issued a referral of the off-site portion of the USS Lead site to the Superfund program to address the off-site contamination on the basis that it was most advantageous for the Superfund program to address the cleanup responsibilities from multiple sources. Although a consideration, the bankruptcy was not the basis for the referral because some limited funding remains, which is

being used towards meeting RCRA obligations (post-closure has been prioritized).

- Bankrupt: Sharon Steel is the parent company; Sharon filed for bankruptcy in April 1987 and again in November 1992. Sharon Steel had agreed to loan money to USS Lead to meet its clean-up requirements (in response to the 1990 Order). However, this was affected by the Chapter 11 bankruptcy. An EPA staff financial analysis from 1994 indicated that USS Lead had available $8 million dollars, as well as potential sources of additional funding from other cleanup properties. So far, USS Lead has spent about $10 million toward closure and corrective action. The facility went bankrupt due to marginal economic viability. According to a 2005 financial analysis by Industrial Economics, the bankruptcy resulted from the extreme levels of debt caused by Sharon Steel's corporate raider owner.
- **Financial Assurance: There was no financial assurance in place for the regulated units.** There was also no financial assurance in place for Corrective Action.
- RCRA Waste Management Activities: Submitted a Part A application and received Interim Status in 1980 for two units: a tank treatment area and a storage waste pile area. The Part B for these two units was called in during 1982, and the facility submitted a Withdrawal request later that year, stating that intended on closing all waste handling facilities. The tank treatment area stopped managing hazardous waste in 1984 and the unit was referred to Corrective Action in 1991. The closure plan for this area was approved by Indiana in 1995, and Indiana certified that closure was completed in accordance with the closure plan in 2005. The waste pile area stopped receiving hazardous waste in approximately 1990 and the unit was referred to Corrective Action in 1991. The closure plan for this unit was approved by Indiana in 1995. (The information we received from the Region was slightly different in regards to the waste piles. They notified us that there were 3 waste pile storage units which Lost Interim Status in 1985.) Post-closure activities at the two RCRA regulated units are being addressed by RCRA Corrective Action. The facility also has state regulated only landfill/CAMU which had its post closure permit call-in in 2003, and Part B submittal in 2005. The facility has a Consent Order with the RCRA Program. The NPL listing will remain proposed until all RCRA authorities have been exhausted.
- PRP Search / Cost Recovery: The Superfund program is far along in the process of Potential Responsible Party searches (following the 2004 referral), but has not initiated the Cost Recovery process. The Superfund process for investigation and clean-up is on-going.

Jennison-Wright Corporation, IL
ILD006282479

- Proposed to NPL 10/2/1995, Listed on NPL – Final on 6/17/1996
- CERCLA Expenditures: $ 1,126,487
- Wood Treatment/Asphalt Sealant Manufacturing: Engaged in wood treatment of railroad ties and wood blocks, using creosote, pentachlorophenol, and zinc naphthanate. Operations at the site began in 1910. Creosote wood treatment was used until 1975. From 1970 to 1984, pentachlorophenol was also used for wood treatment. From 1984 until 1990, zinc naphthanate process was used. Jennite, a coal tar based asphalt sealant, was also manufactured onsite beginning in 1960. The facility discontinued operations in June 1990, and the site was scaled in November 1990.
- Pre and Early Waste Management Activities: Wastes generated during wood treating operations include waste and wastewaters contaminated with creosote, pentachlorophenol, and related compounds. These wastes were disposed in two lagoons. After operations ceased, wastes were left at the site in a railroad tank car, a buried railroad tank car, two above-ground storage tanks, and two lagoons. Three surface impoundment areas have been identified where creosote/pentachlorophenol-contaminated waste materials were dumped.
- Remediation: Illinois has undertaken three incremental field actions: In 1992, it stabilized contaminants on the site (this included asbestos removal and containment, removal and containment of contaminated material from the lagoon area, and securing of drums in a building on-site); in 1994, it removed the most critical contaminants; and 2003, it demolished an onsite structure and removed some of the drip track residue. The 1994 and 2003 actions were federally funded. As part of the Remedial Action, Special Wastes were removed from the site during 2004 and 2005.
- Bankrupt: Filed for Chapter 11 bankruptcy in November 1989.
- **Financial Assurance: No financial assurance was in place for the Regulated Units.** The facility did not certify physical compliance with the groundwater monitoring or the Financial Responsibility requirements of 40 C.F.R. Subparts F and H for the waste management units.
- RCRA Waste Management Activities: The facility never notified EPA or Illinois about RCRA regulated waste management activities. The facility had four regulated units: a storage (work) tank area, one treatment (process) tank area, one surface impoundment disposal (pit) unit, and one surface impoundment storage (tie storage) unit. The Part B application was called-in in 1985 for the surface impoundment storage unit; it was received later that year. Interim Status closure/post closure plans were approved in 1986 for the two tank units and the surface impoundment disposal unit. In 1986, all four units were referred to CERCLA.
- PRP Search / Clean-up Funding: No financially viable Responsible Parties have been identified. The 1992 Removal Action was funded by the proceeds from the 1990 bankruptcy sale.

CAM-OR Inc., IN
IND005480462

- Proposed to NPL 9/25/1997; Listed on NPL – Final on 3/6/1998
- CERCLA Expenditures: $ 4,182,144
- Refinery: The site, formerly known as Westville Oil Division of Cam-Or, collected, stored, and re-refined waste oil from 1934 until 1987, when it ceased operations. The facility purchased waste oil from a variety of generators, including service stations, industrial facilities, railroad yards, and pipelines. The waste oil was re-refined for use in automotive- and industrial-grade lubricating oil blends.
- Pre and Early RCRA Waste Management Activities: Onsite lagoons were constructed around 1959 and used until at least 1978 for waste oil storage/disposal and for gross separation of oil and water fractions. Analysis of samples collected in 1984 and 1985 showed that lagoon contents were contaminated with polychlorinated biphenyls (PCBs) and volatile organic compounds (VOCs). All 11 of the lagoons were unlined. Out of the 191 on-site tanks, eight retention tanks installed in the early 1980s were used to store incoming shipments of waste oil until 1987. There were several oil spills and uncontrolled releases of hazardous substances to Crooked Creek from 1978 to 1980.
- Remediation: In 1986, a TSCA consent agreement and final order required Cam-Or to remediate the PCB-contaminated lagoons at the site. A RCRA order required was also initiated approximately in 1986 to address heavy metals and organic compounds. In July 1986, a consent agreement and final order was filed wherein Cam-Or agreed to close the site. However, Cam-Or failed to proceed with any cleanup. Instead, Cam-Or began to voluntarily liquidate all assets and ceased processing waste oil in 1987. In 1987 EPA initiated a removal action to mitigate the imminent and substantial threat posed by the conditions at the site. EPA did another removal at the site in 1998, which included building demolition, removal of drums from onsite buildings, and limited soil removal.
- Bankrupt: Although there is nothing in the files to show that the company ever officially filed for bankruptcy, Cam-Or voluntarily liquidated its assets in 1987 in order to avoid clean-up and closure obligations.
- **Financial Assurance: Cam-Or never provided any Financial Assurance for the regulated unit at the site.**
- RCRA Waste Management Activities: Filed a Part A application in 1981 for one storage tank area. The Part B was called-in for this unit in 1982 and purportedly received later that year (on August 18, 1982, according to RCRAInfo). However, the Region notified us that the Part B was never actually submitted to EPA and that a complaint was filed against the facility on May 20, 1986. The storage tank unit Lost Interim Status approximately in 1989 and was referred to CERCLA**.**
- Cost Recovery: $2,800,000. In 1993, a group of parties responsible for hazardous materials at the site reimbursed EPA for $2.8 million in costs to that date.

Indian Refinery – Texaco Lawrenceville, IL
ILD042671248

- Proposed to NPL 7/28/1998; Listed on 12/1/2000
- CERCLA Expenditures: $ 305,714
- Refinery: Oil refining operations began in the late 1800s / early 1900s. Several companies have owned the Refinery, including Texaco. In 1985, Texaco Refining and Marketing Inc. suspended operation and shut down the refinery units. During the years of operation, various products, including liquid petroleum gas, motor gasoline, aviation gasoline, jet fuel, burner oil, diesel oil, home heating oil, fuel oil, and asphalt materials, were produced. The northeastern portion of the site (Indian Acres and Indian Acres North) was used for lube oil refining and production until sometime after WWII, when the production facility was abandoned and demolished. This part of the site was then used for land disposal. The central potion of the site consisted of the refinery, a wastewater treatment area, process units, refinery equipment, settling basins, API separators, tanks, and disposal areas.
- Pre and Early RCRA Waste Management Activities: Wastes generated by operations at the site included oily sludges, acidic lube oil filter clay, lime sludge, catalyst waste, and tar and asphalt wastes. Wastes were placed in a wastewater treatment pond, former treatment lagoons and tar pits. There has been off-site migration of oil and wastes (benzene, toluene, xylene, methylnaphthalene, naphthalene, 1,3,5-trimethylbenzene, and total petroleum hydrocarbons) to a river and nearby wooded wetlands. The facility operated for many years prior to the implementation of the RCRA regulations. Much of the waste on the site is historical in nature and a large percentage of it was most likely deposited before the regulations took effect.
- Remediation: In 1985, Texaco conducted an investigation of the Indian Acres property which revealed that the area was a waste disposal area for lube oil acid sludge and lube oil filter cake sludge. These wastes are highly acidic and have an extremely low pH. In 1986 the Illinois EPA conducted a Preliminary Review and visual site inspection in which 33 solid waste management units were identified. An asbestos removal was conducted in 1990. In 1996, Illinois initiated a removal action in cooperation with USEPA to address the off-site contamination in the residential area. Acidic, tar-like waste was excavated, collection pits in the oil seep areas were constructed, oil and water from collection pits was sent to a refinery-owned and operated onsite oil water separator, oil-soaked contaminated soils were placed in one of three onsite bio-cells, and a 760-foot interceptor trench was installed. Since September 2000, Illinois EPA has taken lead oversight responsibilities for all activities ongoing at the site.
- Bankrupt: Yes, American Western Refining (AWR) filed for Chapter 11 Bankruptcy in November 1996. In June 2000, Refinery Services took over demolition activities from American Western due to AWR's bankruptcy issues. American Western came out of bankruptcy in 2005, and they are now the landowner. They are funded until the end of 2006 to operate the wastewater treatment facility.

- **Financial Assurance:** As of 1994, the facility had provided inadequate financial assurance in the form of an incomplete Letter of Credit, an incomplete Trust Fund, and a Certificate of Insurance not on State letterhead. A Letter of Credit for $3 million was renewed in 2005 to fund the American Western Refining clean-up work.
- RCRA Waste Management Activities: Submitted a Part A application prior to 1986. The facility had three storage tank areas, a treatment surface impoundment, and a land disposal unit. (The Region noted the presence of 13 tanks containing hazardous waste; the three tank storage units in RCRAInfo were most likely comprised of multiple tanks, possibly the 13 noted by the Region.) Two of the storage tank units clean closed: one unit was verified by Illinois to have clean closed in 1986 and the other in 1993. The other storage tank unit was denied a permit by Illinois in 1988. The surface impoundment was verified to have clean closed in 1987. According to the Region, the facility wanted to continue the operation of the land application. The facility submitted a Part A, but the permit application was denied in 1986. On January 26, 1989, the refinery applied for a revised Part A permit under the new owner/operator. Based on the information submitted, EPA stated it would approve the proposed permit subject to certain conditions. To date there is no Part A approval. The refinery would have potentially become subject to the HSWA Corrective Action requirements via a Part B post-closure permit or a Corrective Action Order. The closure plan for the land application unit was submitted in 1989 and the unit was referred to CERCLA in 1992.
- Cost Recovery: Under a 2001 Consent Decree, ChevronTexaco will conduct a Remedial Investigation and Feasibility Study (RI/FS). Also as a result of the Decree, American Western Refining agreed to place its property into a trust, provide funding for future cleanup, and pay the Coast Guard $861,865 in administrative expenses.

Region 6: 12 Facilities

Popile, AR
ARD008052508

- Proposed to NPL 2/7/1992; Listed on NPL – Final on 10/14/1992
- CERCLA Expenditures: $ 10,765,731
- Wood Treatment: Prior to being used for wood treatment, the site was associated with oil field and refinery operations. Wood-preserving operations at the Popile site began in 1947. In 1947, El Dorado Creosote Company began treating wood at the 40-acre property using creosote as well as Pentachlorophenol (PCP). El Dorado Pole & Piling Co., Inc., purchased the property in 1958.
- Pre and Early Waste Treatment Activities: A small impoundment was initially constructed to store process wastewater and sludge from the early operations. By 1964, this impoundment had grown considerably in size and a sludge pit was added. Two additional process impoundments were constructed in 1969. By 1976, El Dorado Pole and Piling was using three surface impoundments for the wastewater treatment process. In July 1982, wood treatment operations ceased. In September 1982, Popile bought approximately 7.5 acres of the property, including the surface impoundments and a large open area known as the salt flat. In October 1984, Popile closed the three impoundments as one unit.
- Remediation: In September 1990, the EPA began removal actions at the site in order to address the leaking closed impoundment unit and the release of contaminants from the wood treatment facility, a nearby impoundment that collects surface water drainage from the treatment area, and a large open area known as the Salt Flat. A drainage diversion system was constructed to collect and treat surface runoff during the removal action; two clay-lined holding cells were constructed; contaminated soil from the original RCRA closure impoundments were excavated; contaminated materials were stabilized; the stabilized materials, facility debris, and excavated soil were placed into the two holding cells which were capped. Contaminated material from the Salt Flat and surface water drainage impoundment were also removed during the CERCLA action.
- Bankrupt: It is not known whether this facility went bankrupt, but no evidence has been uncovered to suggest that it did.
- **Financial Assurance:** It is unclear whether or not this site ever maintained financial assurance.
- RCRA Activities: Submitted Part A application in 1980 for two units: one tank treatment unit area and one surface impoundment storage area. The Part B was called in for both of these units in 1984. The facility then submitted its Withdrawal request for both units, stating it intended to close all waste handling facilities. Both of these units certified closure in 1984, but Arkansas deemed that the closure was unacceptable and not performed in accordance with the closure plan. The facility submitted a permit application for post closure activities for the two units in 1984. Interim status for these units was terminated (in 1984 for the

tank treatment unit and in 1985 for the surface impoundment) and they were referred to CERCLA at those times.

National Zinc, OK
OKD000829440

- Proposed to NPL 5/10/1993
- CERCLA Expenditures: $ 5,019,223
- Smelter: National Zinc Company (NZC) began operations at the site in 1907, primarily to recover metals such as zinc, cadmium, and lead from industrial materials. Around 1907, three horizontal retort zinc smelters commenced operations; two ceased operations in the 1920s, and in early 1976, the remaining smelter was converted to an electrolytic zinc refinery, which isn't currently operating. NZC used smelting and chemical processing to recover the metals. In addition to the NZC smelter, a vanadium smelter (closed in the mid-1980s) and two other zinc smelters (closed in the 1920's) have operated on the land that presently encompasses the current Zinc Corporation of America facility. Zinc Corporation of America purchased NZC in 1987 and continued recovery operations.
- Pre and early RCRA Waste Management Activities: The only emission control used by the NZC smelter prior to 1969 was a limited sulfuric acid recovery operation built in 1927. A more efficient acid recovery operation, which greatly reduced the sulfur dioxide emissions, replaced the old sulfuric acid recovery plant in 1969. An electrostatic refining process that replaced the NZC horizontal retort furnaces in 1976 greatly reduced particulate stack emissions. Air emissions were essentially uncontrolled until 1976, when the old retort-type smelter was replaced by the electrolytic smelting process. The pre-1976 operations are presumably the source of the widespread heavy metal contaminations at the site.
- Remediation: The EPA Superfund removal action addressed contamination in 29 high access or public access areas (schools, day care facilities, playgrounds, etc.) in fall 1992. In 1993 the removal action addressed 22 residences of individuals with elevated blood lead levels. Soil contaminated with lead above 500 parts per million (ppm), and with cadmium above 30 ppm, was excavated and removed. The excavated areas were back-filled with clean soil and sodded. In 1993, at the request of elected representatives, community leaders, and potentially responsible parties, EPA agreed to allow the State and PRP's to carry out accelerated investigations and residential soil removal actions, under the State's Voluntary Clean Up program. In return, EPA would postpone final action regarding placement of the site on the National Priorities List. The site successfully remediated and closed with waste in place (see RCRA Section below). ZCA (now Horsehead) reports that the costs for site and local area remediation are on the order of $100,000,000.
- Bankrupt: ZCA filed for bankruptcy in 2002, with a final release in late 2003. The Corporate Owner/Operator of site is now Horsehead Corp., formed specifically to become the owner/operator of this site.
- **Financial Assurance:** Currently, Financial Assurance is guaranteed by a Trust Fund, which was established as part of the exit from Bankruptcy. It is unclear whether or not this site ever maintained financial assurance for NZC operations prior to the Bankruptcy.

- RCRA Waste Activities: A Part A application was submitted in 1980 for 8 units: 4 storage waste piles, 2 storage surface impoundments, and 2 disposal landfills, and a Part B was received for these units in 1992. A post closure permit was issued for the 4 waste piles and the 2 surface impoundments in 1995. Closure verification for these 6 units occurred in 2004. An operating permit for the 2 landfills was issued in 1995. The operating permit for the landfills terminated/expired in 1998 and these units underwent closure. The post-closure Part B for the landfills was received in 2001, and the facility certified closure for them in 2004. The closure was also verified by Oklahoma in 2004. The renewed Post-Closure Permit was issued in 2005. There are two closed landfills, and one CAMU in place at the site which are covered by the Post-Closure Permit.

RSR Corporation, TX
TXD079348397

- Proposed to NPL 5/10/1993; Listed on NPL – Final on 9/29/1995
- CERCLA Expenditures: $ 25,854,165
- Smelter: RSR and predecessor companies (Murmur Corporation, et. al.) operated a lead smelter at the site from 1936 until 1984. The smelter processed lead slag and scrap from battery manufacturing. Operations stopped in 1984.
- Pre and early RCRA Waste Management Activities: Contamination at the RSR site resulted from historical air emissions from the smelter, the use of battery chips (pieces of automotive battery casings generated from recycling operations at the smelter) and slag as residential fill, and the disposal of battery chips and slag in landfills and other land disposal dumps. Three areas where large quantities of slag material have been dumped have been identified. In 1968, the City of Dallas began a series of legal actions against RSR Corp., including fines, lawsuits, and compliance agreements for violations of air emission standards. In 1983, the State, City, and EPA ordered RSR (under an AOC) to conduct soil cleanup and control stack and fugitive emissions from the smelter. The City ordered RSR to stop lead smelting operations in 1984.
- Remediation: The first removal occurred in 1984 and soils were removed from residential areas, public play areas, day care centers, and private gardens within a one-half mile radius of the smelter when lead levels were more than 1,000 parts per million. The second removal occurred in 1991 and involved further the cleanup of contaminated residential and high risk areas (schools, church playgrounds, parks, etc.).
- Bankrupt: No.
- **Financial Assurance:** A Trust Agreement between Murmur Corporation and Commodore Savings for $364,287 was dated May 4, 1984. The Company provided financial assurance of around $284,000 (there is a possibility the Trust Fund was not fully funded and this may explain the difference in the amounts stated above). The mechanism was drawn upon in 2006 as part of a settlement with EPA.
- RCRA Waste Management Activities: The facility submitted a Part A in 1984 for five units: a surface impoundment disposal unit, a waste storage pile, a container storage area, a battery building storage area, and an “other” treatment unit (concrete basin). The part B permit application for the surface impoundment disposal and the waste storage pile units was called-in in 1984. The Part B was received for the battery building, the disposal unit, the waste storage pile, the concrete basin, and the container storage area in 1984. These units stop receiving waste in 1987 after the RCRA permit was denied. At the same time Interim Status of these units was terminated. The units were referred to CERCLA in 1986/1987.

ALCOA (Point Comfort)/Lavaca Bay (Formosa Plastics), TX
TXD008123168

- Proposed to NPL 6/23/1993; Listed on NPL – Final on 2/23/94
- CERCLA Expenditures: $ 2,117,457
- Smelter and Chemical Manufacturer: ALCOA has been conducting operations since 1948. The plant originated as an aluminum smelter. Primary activities currently include bauxite refining and production of aluminum fluoride. A carbon plant operates intermittently to produce carbon briquettes. Bauxite refining began in 1958. Other operations at ALCOA have included a cryolite plant (1962-1979), a chrome plating operation (dates of operation unknown), and the chlorine-alkali plant (1965-1979). The chlorine-alkali plant produced chlorine gas and sodium hydroxide through an electrolytic process that utilized mercury cathodes. Witco Chemical Corporation operated on the site and processed coal tar for electrode binder pitch and creosote beginning in 1964 until 1985. ALCOA also operated a gas plant from 1957 until 1989. In 1989, the gas plant area and part of the smelter area were sold by ALCOA and are now owned by Formosa Plastics. ALCOA is currently operating and bauxite ore is refined to alumina. The site includes contaminated sediments in the bay and an associated man-made dredge spoil island located approximately 1,200 feet west of the ALCOA plant. The dredge spoil island is composed of a 91-acre gypsum lagoon and a dredge spoil area (covering approximately 50 acres) that includes five lagoons.
- Pre and early RCRA Waste Management Activities: The primary contaminants of concern for the Lavaca Bay system include mercury and polycyclic aromatic hydrocarbons (PAHs). Mercury contamination of the site has been attributed to wastewater discharges from the chlorine-alkali unit. ALCOA estimated that up to 67 pounds of mercury per day were discharged into the Bay and that an additional 89 pounds of mercury per day were released into the atmosphere. In addition to wastewater discharges, mercury-contaminated solids, wash down water, filter materials, and equipment were stored or disposed of in various areas of the site, including several on-shore lakes, the chlor-alkali lagoon, the dredge spoil island, and waste landfills. The two primary sources of hazardous substances at the site identified by EPA to date are the gypsum lagoon and the dredge spoil areas. During the plant's operation, waste water containing mercury was discharged into Lavaca Bay through outfalls located on the off-shore gypsum disposal lagoon. Dredge spoils contaminated with mercury were disposed of in several areas on the site. In 1970, the Texas Water Quality Board issued an Emergency Order against ALCOA, finding them responsible for the mercury discharged to the off-shore gypsum lagoon, which contaminated Lavaca Bay and created harmful and possibly toxic conditions for humans, animals, and aquatic life. In April 1988, the Texas Department of Health (TDH) issued an order prohibiting the taking of finfish and crabs from a specific part of Lavaca Bay (“Closed area”) due to levels of mercury in fish tissue above Food and Drug Administration standards. The Texas Water Commission (TWC) identified Witco Chemical Company as a likely source of creosote and its polycyclic aromatic hydrocarbon (PAH) constituents.

Additionally, PCBs have been detected in a limited number of sediment, fish, and oyster samples.

- Remediation: As part of a removal action on the dredge disposal island, Alcoa relocated approximately 523,000 cubic yards of mercury-contaminated dredge spoils into a fortified disposal area. In addition, approximately 93,000 cubic yards of mercury-contaminated soils were removed from the island and placed in the fortified disposal area. During a treatability study, Alcoa dredged and disposed of an additional 80,000 cubic yards of mercury-contaminated sediments.
- Bankrupt: No.
- **Financial Assurance: Not Applicable** – Financial Assurance was no longer required for the Regulated Units after they Clean Closed (1986). It is unclear whether or not this site ever maintained financial assurance (pre-1986).
- RCRA Waste Activities: Two Regulated Units were noted in RCRAInfo: one container bulk storage area (#11), and one land disposal landfill (#10). It is unclear when Part A's were submitted for these units. The two units operated under Interim Status until Texas verified they were clean closed in 1986. A withdrawal request for both units was approved in 1986. According to the Region, a Part A was submitted for Formosa Plastics on May 24, 1991, and there is no record of a Part A being submitted prior to that date.
- Cost Recovery / Consent Decree: $1,504,726 plus all future government costs. ALCOA entered into a 2004 Consent Decree with USDOJ, EPA, Texas Commission on Environmental Quality (TCEQ), and various federal and state agencies. ALCOA had reimbursed EPA and TCEQ over $1,000,000 in the prior few years for costs incurred, and agreed to further reimburse the US $404,726 and Texas $100,000, as well as all future government costs. ALCOA also agreed to undertake various cleanup activities and ecological restoration activities, as well as offset recreational fishing losses. ALCOA has already spent approximately $40 million conducting early response actions and will spend approximately $11.4 million to complete the remaining cleanup actions.

Jasper Creosoting Company, TX
TXD008096240

- Proposed to NPL 3/6/1998; Listed on NPL – Final on 7/28/1998
- CERCLA Expenditures: $ 2,325,585
- Wood Treatment: Jasper Creosoting Company operated as a wood treatment facility from 1946 until 1986. It was abandoned by its owners in 1992. The main operations consisted of treatment of railroad ties and utility poles with creosote and pentachlorophenol. The site consists of a process area and a pole and lumber storage area.
- Pre and early RCRA Waste Treatment Activities: From 1946 to 1964, wastewater from the creosoting process was discharged directly into several surface impoundments that then drained into a ditch running parallel to the eastern edge of the site. From 1964 to 1971 the wastewater from the surface impoundments was discharged to the City of Jasper wastewater treatment facility; however, beginning in 1971, the wastewater was again discharged to the drainage ditch. Known sources of contamination are tanks storing wood process materials, specifically, creosote and pentachlorophenol (estimated 41,306 gallons); a backfilled surface impoundment containing process wastewater (estimated volume unknown), and contaminated soils associated with the process/treatment area of the facility (estimated volume unknown).
- Remediation: In 1996, EPA dismantled the existing tanks, structures and equipment, removed liquid wastes and contaminated soils from the site, drained the on-site impoundments, stabilized the remaining sludge, and consolidated the sludge and contaminated soil into an on-site waste cell. The waste cell is approximately 1.0 acre in area, is fenced with posted warning signs, and contains an estimated volume of 14,000 cubic yards. From November 1999 to January 2000, EPA conducted a second removal action to address surface erosion on the on-site waste cell. This action included site stabilization; removal of some littered, creosote-soaked lumber; and removal and off-site disposal of some free-flowing liquid from an exposed pipe leading out of the capped cell.
- Bankrupt: It is not known whether this facility went bankrupt, but no evidence has been uncovered to suggest that it did.
- **Financial Assurance:** It is unclear whether or not this site ever maintained financial assurance.
- RCRA Activities: The Facility had one storage surface impoundment that failed to notify it was managing hazardous waste. In March 1986, the Texas Attorney General's Office filed a PLAINTIFF'S ORIGINAL PETITION in the District Court against JCC for the unauthorized discharge of storm water to state waters and for failure to apply for a permit to store, dispose, and treat hazardous wastes. There was also a note that the facility closed the surface impoundment illegally in 1982. The facility was referred to CERCLA in 1985.

Rockwool Industries, TX
TXD066379645

- Proposed to NPL 3/6/1998; Listed on NPL – Final on 9/29/1998
- CERCLA Expenditures: $ 3,122,434
- Manufacturing: Rockwool Industries, Inc manufactured mineral wool insulation from the mid-1950s until February 1987. Rockwool manufactured both blow wool insulation (lubricating-oil-coated bulk wool mineral fibers spray-blown into attics for thermal insulation) and batt wool insulation (organic-resin-bound mineral wool sandwiched between paper and used as wall insulation). The mineral wool was manufactured in blast furnaces using slags from copper and antimony smelting, waste from limestone mining, as well as coke and basalts. From 1984 to 1987, Rockwool operated under a Resource Conservation and Recovery Act (RCRA) permit. Site has been inactive since February 1987.
- Pre and early RCRA waste management activities: The residue left in the furnace from the heating of the slags was a metal "shot" type material that was disposed of in three waste pile areas. The "spent iron shot" was the main waste type generated as a part of the Rockwool production process. Arsenic containing bag house dust was also generated at the site. During site operations, there were numerous other solid waste management units that were used to dispose of process wastes. Sampling in nearby surface water areas has indicated the presence of high concentrations of inorganics (especially selenium) above the release criteria.
- Remedial Activities: EPA conducted sampling during 2001, detecting arsenic, antimony, and selenium in nearby Leon River water. The final RI/FS report was approved by the Texas Department on Environmental Quality (TCEQ) in January 2003. The Remedial Design (RD) for the final ROD was started on October 8, 2003. A final ROD was signed on September 30, 2004. The Remedial Action (RA) to implement the remedy in the RD was started by February 15, 2005. The total remedy was completed by September 29, 2005, at which time the Preliminary Close Out Report was signed, denoting the completion of the Remedial Action (Construction Completion).
- Bankrupt: Yes. According to the Region, Rockwool entered into bankruptcy.
- **Financial Assurance:** Rockwool provided a $700,000 Letter of Credit to meet permit requirements in 1991. Despite the bankruptcy, the State still successfully drew on the $700,000 letter of credit mechanism (the FA instrument worked). Insufficient Cost Estimates were a major problem according to the Region.
- RCRA Waste Management Activities: Three units were identified in RCRAInfo for this facility: one surface impoundment Treatment unit, a Baghouse Dust Surface Impoundment, and a Baghouse Landfill. It is not clear when or if Part A's were submitted for these units. The Baghouse Dust Surface Impoundment unit operated under interim status until it closed in 1984. Texas called in and received the Post-closure Part B in 1985. Texas verified that this unit was properly closed as a landfill in 1988. Texas issued a post closure permit and compliance plan for this landfill in 1991. The baghouse dust landfill unit operated under Interim Status until it closed in 1991 and when a post-closure permit was

issued. The baghouse dust landfill is a separate unit from the surface impoundment which closed as a landfill. The surface impoundment treatment unit listed in RCRAInfo was not regulated as a TSD, conducting activities not requiring a permit. (A Post-Closure Part B was called-in in 1985 for this unit, leading to speculation that it might be the same impoundment which closed with waste in place as a landfill. The Region and the State of Texas were unable to confirm or refute this.)

Delatte Metals Inc, LA
LAD052510344

- Proposed to NPL 7/28/1998; Listed on NPL – Final on 1/19/1999; Deleted from NPL on 8/8/2005
- CERCLA Expenditures: $ 23,113,122
- Battery Recycling/Lead Smelter: The Delatte Metals site is an aggregation of the inactive Delatte Metals facility and the inactive Ponchatoula Battery Company. The Delatte Metals facility began operations in 1970 as the Fuscia Battery Company. The Ponchatoula Battery Company moved its operation to the property adjacent to the Delatte and Fuscia Battery Company between 1972 and 1978 and operated until 1981. The two sites are aggregated because they are adjacent, performed identical lead salvage operations, and generated the same type of waste material. Operations at the two facilities involved sawing open spent lead-acid batteries and draining the acid from them. The lead was recovered and smelted to form lead ingots, which were sold to lead recycling facilities. Battery recycling operations at Delatte Metals ceased in the early 1980s. A scrap metal facility still operates on a portion of the facility.
- Pre and Early RCRA Waste Management Activities: The batteries were cut open at the battery hammersaw mill and the acid was allowed to drain into unlined holding ponds at each site. The holding ponds had no containment structures. The battery casings were then discarded on site. After the closure of the acid pond, the acid was pumped through an underground pipe to the acid tank farm. The spent acid was then shipped off-site for recycling. Drainage from the facilities was channeled to Selser's Creek through various ditches. Delatte was issued several Notice of Violations and Compliance Orders and discharges from the facilities showed a pH range from 0.55 to 2 during State and EPA inspections. Two battery chip piles, two slag piles, a waste pile, a buried/backfilled surface impoundment, tote bags, a contaminated soil area, and a settling tank basin were observed at the facility in the early 1980s. In 1982, the facility submitted a closure plan to Louisiana for an on-site acid neutralization pond (which was possibly non-RCRA regulated).
- Remediation: In 1998, EPA removed above-ground waste such as piles of slag, battery chips, the acid tank farm, furnace building, drums of metal-contaminated waste and tote bags of baghouse dust. Remedial cleanup began in 2002 and approximately 41,000 cubic yards were excavated, treated, and disposed of in an offsite landfill. An estimated 1.5 million gallons of water was treated and discharged. The cleanup was completed in September 2003, and the site was removed from the National Priorities list on August 8, 2005. The final remedial action (RA) cost of $13.1 million is an increase of $3.2 million over the ROD estimate of $9.9 million. (The Superfund expenditures reported above (taken from IFMS) were approximately $23.1 million. There were questions as to whether the $10 million of CERCLA expenditures above the cost of the RA were all due to a 1998/1999 Removal, or if there was another possible reason for the difference in amounts. However, the Region was unable to answer this.)

- Bankrupt: It is not known whether this facility went bankrupt, but no evidence has been uncovered to suggest that it did.
- **Financial Assurance:** It is unclear whether or not this site ever maintained financial assurance.
- RCRA Waste Management Activities: In 1984, Louisiana conducted a facility inspection, which identified the facility as a hazardous waste TSDF. The facility submitted a Part A application in 1991 for an "other treatment" area (16 units); the Part B was received in 1992. This unit was not built and never operated and the permit was denied in 1995, by which time it was being referred to as a Storage container (16 units). Delatte also submitted a Part A in 1991 for two storage containment buildings (these had operated under Interim Status). In 1991, Interim Status was terminated for these two units.

Mountain Pine Pressure Treating, AR
ARD049658628

- Proposed to NPL 4/23/1999; Listed on NPL – Final on 7/22/1999
- CERCLA Expenditures: $ 3,203,499
- Wood Treatment: The Mountain Pine Pressure Treating site consisted of three contiguous facilities. The three facilities were Mountain Pine Pressure Treating (MPPT), Plainview Lumber, and the Chromate Copper Arsenate Treatment Plant (CCATP). MPPT is a subsidiary of Plainview and treated timber with solutions of pentachlorophenol (PCP) and chromate copper arsenate (CCA) from 1965 to 1981. The CCATP facility was operated by Plainview from 1980 to 1986 and then again for a brief period in the summer of 1989.
- Pre and early RCRA Waste Management: The MPPT waste management system consisted of separate PCP and CCA drip tracks, a recovery holding pond, separate PCP and CCA treatment cylinders, a spray evaporation pond, and an oil separator. In 1987, the dike surrounding the holding pond was breached allowing wastewater and sludge containing PCP and CCA to enter the adjacent drainage ditch, Porter Creek, and wetlands along the creek.
- Remediation: In 1987, EPA began a Removal Action to alleviate liquid and sludge releases from the recovery holding pond. Approximately 2,500 cubic yards of sludge mixed with solidification additives were placed beneath a two-foot cap constructed in February 1988. Remedial Action work began in April 2005, and it is now construction complete (as of September 2005).
- Bankrupt: It is not known whether this facility went bankrupt, but no evidence has been uncovered to suggest that it did.
- **Financial Assurance:** It is unclear whether or not this site ever maintained financial assurance.
- RCRA Waste Management Activities: Submitted a Part A Application in 1980 for three (lagoon) units: two surface impoundment storage units and one surface impoundment treatment unit. The Part B for the units was called in and received in 1985. Interim status of these units was terminated in 1986 when the permit was denied. A post-closure permit application for these units was called-in in 1988, when the units were referred to CERCLA.

Hudson Refinery, OK
OKD082471988

- Proposed to NPL 4/23/1999; Listed on NPL – Final on 7/22/1999
- CERCLA Expenditures: $ 12,054,479
- Refinery: The Hudson Oil Refining Company site is a 200-acre, abandoned, crude oil refinery that was active from 1922 to 1982. Hudson produced liquid propane gas, gasoline, diesel fuel, fuel oils, and coke. Before the refinery closed and was abandoned in 1982, it had a production rate of approximately 20,000 barrels per day. At shutdown in 1982, the tanks, lines and vessels were not properly purged, and various chemicals were left on site.
- Pre and early RCRA Waste Management Activities: Waste management at the site included wastewater separators, bio-treatment ponds and a land treatment unit. Little is known about the operations or waste management practices of the facility prior to 1977, although the aerial photographs show process areas and tank farms. The site historically also included stained soils and loose and friable asbestos containing material. Runoff from the site enters on-site wetlands and storm water collection ponds.
- Remediation: From 1998 to 2003, EPA conducted two emergency removal actions. During the 1998 removal EPA removed asbestos, hydrogen fluoride, tetraethyl lead, other production chemicals, and catalysts, as well as unsafe structures on the south refinery. The second removal in 2002 involved the demolition and the removal of chemicals from the unsafe buildings and structures on the north refinery. RI/FS Phase 1 work was completed between May and October 2004. Phase II filed work was completed in March 2005. Field work consisted of soil, sediment, surface water, ground water and air sampling.
- Bankrupt: Filed for bankruptcy in 1982.
- **Financial Assurance:** It is unclear whether or not this site ever maintained financial assurance.
- RCRA Activities: Submitted a Part A application in 1980 for two units: A land treatment unit and a tank storage area. The Part B permit application was called-in for these units in 1984. The facility withdrew the application for operating these units in 1987 and intended to close them. Oklahoma approved the withdrawal request in 1988. The tank unit and land treatment unit certified closure in 1994. The land application treatment unit was issued a post closure permit in 1996. The unit completed post closure in 2002 at which time Oklahoma terminated the permit. No HSWA corrective action permit was issued because CERCLA was conducting all required cleanup activities. The tank unit had its Interim Status terminated and it was referred to CERCLA (the date given in RCRAInfo for this was 1984; the Region was unable to confirm or refute this).

Hart Creosoting Company, TX
TXD050299577

- Proposed to NPL 4/23/1999; Listed on NPL – Final on 7/22/1999
- CERCLA Expenditures: $ 2,634,803
- Wood Treatment: The Hart Creosoting Company site is an inactive former wood treating facility that operated from 1958 to 1993. During its history, a pole peeling plant also operated at the facility from 1968 to 1978 and pipe threading operations were conducted at the facility from 1982 to 1985. Poles were treated with coal tar derived Creosote. Operations ceased in May 1993.
- Pre and Early RCRA Waste Treatment Activities: The existence of several tanks and five on-site impoundments, as well as a "Pond A" have been verified.
- Violations: Between 1984 and 1991, Texas environmental agencies repeatedly cited Hart Creosoting for RCRA violations. On July 25, 1990, an Enforcement Order was issued, which resulted in the facility filing a new Permit Application and Compliance Plan in 1991. A 1993 Texas Water Commission Order was issued due to additional releases which required Corrective Action. The major problem with the facility was that the company was unable to clean up the contamination on the property which resulted from the releases.
- Remediation: In 1995, EPA conducted a time-critical removal action and pumped contaminated water from the on-site surface impoundments and treated it to remove contaminants. The treated water was discharged to the intermittent creek along the western boundary of the site. EPA also excavated contaminated sediments, soils and hazardous materials from visually contaminated areas on the site and enclosed them in a clay-lined and clay-capped on-site storage pit.
- Bankrupt: Yes. According to the State of Texas, Hart filed for Chapter 11 as per a May 24, 1991 letter.
- **Financial Assurance:** Hart had maintained Financial Assurance of $75,000 in 1986. It was gradually reduced to finance cleanup (i.e., the mechanism was drawn upon). After the 1990 Enforcement Order, a revised 1991 Permit Application stated they had $18,000 for Closure and $5,000 for Post-Closure, but no financial assurance mechanisms were submitted or in place.
- RCRA Waste Treatment: The facility had one storage surface impoundment unit. The date of the Part A submittal for this unit is not clear. The unit operated under Interim Status and was referred to CERCLA in 1985. A closure plan for this unit was approved in 1986. According to Texas, a new Permit Application, including a Part A, a Part B, and a Compliance Plan, was submitted on January 25, 1991, as a result of the 1990 Enforcement Order.

Garland Creosoting, TX
TXD007330053

- Proposed to NPL 7/22/1999; Listed on NPL – Final on 10/22/1999
- CERCLA Expenditures: $ 8,359,904
- Wood Treatment: Garland Creosoting Company began wood treating operations at the facility in 1960 and operated until February 1997. Wood was treated with coal tar derived Creosote.
- Pre and early RCRA Waste Treatment Activities: Prior to 1985, wastewater generated by the Garland Creosoting facility system was treated and discharged to five surface impoundments to allow evaporation. The facility discontinued use of the surface impoundments in 1985 and diverted treated wastewater to the City of Longview wastewater collection and treatment system. A sixth surface impoundment was used at the facility to contain wastewater in the event of a spill from the process area or wastewater treatment plant. In May 1986, Garland Creosoting decided to close the five surface impoundments used as wastewater evaporation ponds. In November 1989, the five surface impoundments were capped, leaving the creosote contaminated sludge and soil in place. In June 1990, the facility was issued a post-closure care permit for the impoundments requiring that Garland Creosoting install, operate, and monitor a ground water recovery system to address the contamination.
- Remediation: In May 1997, the Texas Natural Resource Conservation Commission (or TNRCC, the predecessor agency to TCEQ) inspected the facility and found that the ground water treatment system ceased operation and a dark oily substance was observed flowing downhill from the ground water collection trench sump into a nearby creek. Creosote saturated soil was observed, as well as discharges to the banks of a nearby creek. TNRCC initiated an emergency response action in May 1997 to diminish ongoing discharges and stabilize the site. The TNRCC's emergency response cleanup involved pumping the ground water collection sump dry and containerizing recovered ground water on site. Recovered water was treated and discharge to the intermittent creek while the recovered product was transported for waste recycling, reclamation, or disposal. EPA completed a removal action in April 2000 which began in November 1999. The actions completed under the removal action included: removal and off-site disposal of all contaminated liquids in tanks and containers; removal of source material from three on-site surface impoundments and process areas. EPA conducted a non-time critical action from February to May 2003. The purpose of the removal action was to prevent free-phase creosote and contaminated ground water from migrating into the intermittent creek located on the southern boundary of the site. An Interceptor Collection Trench was built during this action, and it has prevented the movement of contaminated ground water into an intermittent creek.
- Bankrupt: Facility filed for Chapter 7 Bankruptcy in February 1997.
- **Financial Assurance:** $100,000 Financial Assurance was maintained for Post-Closure in 1985. The Post-Closure permit issued June 1990 required $82,000 in additional financial assurance. These Post-Closure funds were later drawn upon.

A Compliance Plan was issued in June 1990, and this required another $960,000 in financial assurance on a pay as you go basis. No financial assurance was ever received for the Compliance Plan, and the case was referred to Enforcement. After the need for Corrective Action was determined, the company was unable to provide Financial Assurance.

- RCRA Activities: The facility had five storage surface impoundments (evaporation ponds), which were recorded as one unit. The date of the Part A submittal for this unit is not clear. The facility certified closure (with waste in place) for the surface impoundments in 1989, and Texas verified this in 1990. A Post-Closure Part B permit application for the surface impoundments was received in 1985, and the Post-Closure permit was issued in 1990 (permit expired in 2000).

Marion Pressure Treating, LA
LAD008473142

- Proposed to NPL 10/22/1999; Listed on NPL – Final on 2/4/2000
- CERCLA Expenditures: $ 4,047,301
- Wood Treatment: The facility treated wood products, including poles, bridge pilings, fence posts, and other lumber, using a creosote pressure impregnation process. The facility began operations in 1964 and ceased operations in 1989 (due to bankruptcy). Although the facility was situated on a 10-acre tract of land, operations extended well beyond this and current areas of concern cover over 22-acres.
- Pre and early RCRA Waste Treatment Activities: Creosote contaminated process wastewater was generated during the wood treatment process and was disposed on site from 1964 to 1983 in an unlined surface impoundment. There has also been confirmation of the existence of a tank product storage area.
- Remediation: In November 1996, EPA funded the removal and offsite disposal of four loads of creosote sludge from tanks at the facility. As part of the removal action, EPA also funded the excavation of creosote-stained soil and debris from the southern, northwestern, and eastern areas of the facility and the consolidation and capping of the excavated material in the former process area. 1999 investigations by EPA and the Louisiana Department of Environmental Quality led to the discovery of black, creosote-stained soil in many locations throughout the site. Erosion has occurred near the consolidation area, threatening to undermine the integrity of the cap and surrounding fence. The liner covering the contaminated soil in the consolidation area is exposed at several locations, and erosion could result in the further spread of contamination.
- Bankrupt: Filed for bankruptcy in October 1989.
- **Financial Assurance**: It is unclear whether or not this site ever maintained financial assurance.
- RCRA Activities: Submitted Part A application in 1984 for two units: one tank storage area and one surface impoundment storage area. The Part B was called in for the Tank Storage area in 1984 and Marion withdrew its permit application for this unit in 1985. Louisiana received closure certification for the surface impoundment unit in 1987. A 1989 enforcement inspection led the facility to be classified as abandoned (this was done at the time of the bankruptcy). Interim Status for these units was terminated in 1990 when they were referred to CERCLA.

Region 8: 2 facilities

PetroChem Recycling Corporation (Ekotek Plant), UT
UTD093119196

- Proposed to NPL 7/29/1991; Listed on NPL – Final on 10/14/1992; Deleted from NPL on 6/30/2003
- CERCLA Expenditures: $ 4,032,359
- Refinery/Hazardous Waste Management: PetroChem Recycling Corporation was an oil refining facility from 1953 to 1978. From 1953 to 1968, it was owned and operated as a refinery by O.C. Allen Oil Co. In 1968, Flinco, Inc., (which later changed its name to Bonus International Corp.) purchased the refinery and operated it until 1978. In 1978, Axel Johnson, Inc., acquired ownership and operated the site as a hazardous waste storage/treatment facility and as a petroleum recycling facility through its subsidiary, Ekotek, Inc. Ekotek declared bankruptcy in November 1987. Petrochem Recycling Corp. leased the facility in 1987 from Ekotek and continued operations until February 1988. The Ekotek bankruptcy estate remains the current site owner. Hundreds of companies sent oil used for recycling to the plant from the five surrounding states.
- Pre and Early RCRA Waste Management Activities: Oil recycling processes created acidic sludge containing hazardous wastes, which were stored in piles on the site. The plant used drums, 78 above-ground storage tanks and many underground tanks to store large volumes of oils, chemicals and hazardous wastes. Some of the oil was contaminated with PCBs. Additionally, there were three retention ponds (two of those ponds were concrete-lined open impoundments) in the northwest section of the property. Waste and sludge piles and an acid sludge pit were in the northeast section of the property. The plant was noted for improper/illegal waste management, and in late 1987 and early 1988, the State of Utah issued Notices of Violation to Petrochem Recycling Corporation for permit violations.
- Remediation: EPA began an emergency response in November 1988 to stabilize wastes. An owner and an operator of the Plant were subsequently convicted of environmental crimes based on their actions. In February 1992, EPA identified 470 businesses and agencies as potentially responsible parties (PRPs) for the site. As of July 1992, 129 PRPs had agreed to perform the RI/FS in accordance with an Administrative Order on Consent signed by EPA and the PRPs. The PRPs removed above-ground and underground storage tanks, containers, contaminated sludge, pooled liquids, and processing equipment from the site. In March 1998, EPA and the ESRC signed an agreement to finance and carry out the remedy. The work was completed in April 2000. Ground-water monitoring will continue until the cleanup standards are met. The site will remain zoned for industrial use.
- Remedial Action: The Responsible Party led Remedial Action took place from 1999 to 2002, and the site was Deleted from the NPL in 2003.
- Bankrupt: Ekotek declared bankruptcy in November 1987.
- **Financial Assurance:** It is unclear whether or not this site ever maintained financial assurance.

- RCRA Waste Management Activities: Submitted a Part A application in November 1980 for a container storage area, a tank storage area, and a waste pile (storage). The Part B for the three units was called-in in 1982. From 1980 to 1987, the facility operated under Interim Status and received a hazardous waste storage permit in July 1987 for the container storage area and the tank storage area, but the permit was denied for the waste pile area (April 1987). In 1987/1988, the State of Utah issued Notices of Violation to Petrochem Recycling Corporation for permit violations. Interim Status was terminated (although the exact date is unclear) and the facility was referred to Superfund. A post-closure Part B was called-in for the waste pile in 1999. The facility closed in February 1988. (The information we received from the Region differs slightly here. The Regional information was that the Part A was submitted for a tank storage area, two miscellaneous treatment processes, and a waste pile (storage). The container storage unit noted above may have had a Part A submitted for it at a different time.)
- Cost Recovery: Non Special Account $5.3 Million (includes interest and indirect costs)

Asarco, Inc. (Globe Plant), CO
COD007063530

- Proposed to NPL 5/10/1993
- CERCLA Expenditures: $ 3,261,306
- Smelting: The Globe Plant began operating in 1886, producing gold, silver, copper, and lead (separating impurities from these substances via smelting). In 1901, American Smelting and Refining Co. (later renamed ASARCO, Inc.) purchased the site and converted it to a lead smelter. In 1921, lead smelting was replaced by arsenic trioxide production (used for insecticides, medicines and glass), which lasted for about 5 years, when the plant changed to cadmium production (which was used as a protective coating for iron and steel). Globe now produces high-purity metal alloys and specialty metals for advanced electronic applications. Currently, cadmium, litharge (lead oxide), thallium, and other high-purity metals are produced.
- Pre and Early RCRA Waste Management: Lead slag was deposited on the floodplain portion of the site and is approximately 15 feet thick and 1700 feet in length. Precipitates in the former neutralization pond area resulted from the addition of lime to spent process solutions generated by the cadmium refining operations. The precipitates formed a mound which measured seven acres by eight feet high. In May 1986, the neutralization pond was taken out of service. The area was regraded and covered with six inches of clayey soil, and vegetated with native grass. Hazardous substances have been released from the former Neutralization Pond and associated Precipitate Pile, the Slag Pile, and contaminated soil both on and off the site. Offsite migration of mining wastes is not covered under RCRA jurisdiction. In 1980 and 1981, Colorado department of Health found that ASARCO was violating the Colorado Solid Waste Disposal Sites and Facilities Act.
- Remediation: In 1981, Colorado sued ASARCO under CERCLA Section 107; they reached a settlement to clean up the site in July 1993. ASARCO will pay for the site's cleanup. The Colorado Department of Public Health and Environment (CDPHE) is in charge of administrative and technical oversight. Cleanup of community soils began in the summer of 1994. Some 650 residential properties and 70 acres of commercial property have been remediated. Workers completed cleanup of the industrial drainage ditch in the fall of 1995. The terrace drain was completed early in 1999 and treats about 12,000 gallons of water per day. The former neutralization pond will be addressed in 2005.
- Bankrupt: Filed for bankruptcy protection in August 2005.
- **Financial Assurance:** It is unclear whether or not this site ever maintained financial assurance.
- RCRA Waste Management: Submitted a Part A application in 1980 for one unit: a container storage area, which operated under Interim Status. Another unit at the facility, a surface impoundment storage unit, failed to notify that it was managing hazardous waste (making it an illegal/non-notifier unit). Both of these units are closed and were referred to CERCLA in 1991. In 1999, the Post-Closure permit Part B was called-in for the surface impoundment.

- Cost Recovery: Although a $100 Million trust fund was set up by ASARCO, Colorado is not in the multistate cost recovery initiative. (This fund had been set up in 2003 to pay for ongoing and future cleanup responsibilities in exchange for allowing the company to shift assets to its parent corporation, Grupo Mexico. EPA and state officials have said the trust fund will not cover all of ASARCO's cleanup obligations.) ASARCO had agreed to pay for the site's cleanup in a 1993 settlement with the State of Colorado.

Region 9: 3 Facilities

McCormick & Baxter,CA
CAD009106527

- Proposed to NPL 2/7/1992; Listed on NPL – Final on 10/14/1992
- CERCLA Expenditures: $ 18,190,909
- Wood Treatment: From 1942 to 1990, McCormick & Baxter treated utility poles and railroad ties with creosote, pentachlorophenol (PCP), and compounds of arsenic, chromium and copper.
- Pre and Early RCRA Waste Treatment: Wood treating chemicals were stored in tanks, and oily waste generated by the wood-treatment processes was stored in unlined ponds and concrete tanks on the site. Between 1945 and 1969 wastewater and cooling water were discharged into the river. Boiler water, storm water, and oily wastes were reportedly directed to a waste disposal trench in the southeast part of the site prior to 1971. Contaminated soil was removed from this area in the 1980s. Waste oil containing creosote and pentachlorophenol were applied to soils to improve their structural stability. Surface water runoff from the site was discharged to a nearby slough until 1978, when it began to collect in two storm water collection ponds. The erection of the two ponds and a perimeter dike was in response to a 1977 observed fish kill in the slough. The unlined oily waste ponds were closed in 1981. Residues from retorts, an oil/water separator, and evaporators were disposed of in the former waste disposal area. Contaminated soils were removed on more than one occasion while the facility was in operation. Also, a shallow aquifer beneath the site is contaminated with process wastes. In October 1984, McCormick & Baxter received a RCRA permit for a concrete oily-water treatment tank and a drum storage area. These units clean closed in 1990. The storm water collection ponds are under Interim Status as RCRA hazardous waste management units.
- Remediation: EPA improved site security and disposed of chemicals and sludges remaining at the site. EPA completed demolition of all site treatment vessels, structures and above-ground tanks and piping in 1994. In 1996-1997, EPA installed a 437-foot sheet piling wall along the shoreline of Old Mormon Slough to control seepages from the former oily waste ponds, excavated approximately 12,000 cubic yards of oily waste and backfilled the area with clean fill. The excavated material is contained on-site in a lined repository in the central portion of the site. A cap was installed in the central site to prevent infiltration and to control dust migration. EPA installed 29 new monitoring wells in 1995. EPA selected a final cleanup remedies for soils (on-site consolidation and capping) and sediment (in-place capping) in March 1999.
- Bankrupt: The owner filed for bankruptcy protection in December 1988.
- **Financial Assurance:** It is unclear whether or not this site ever maintained financial assurance.
- RCRA Waste Management: Submitted a Part A application in 1980 for a tank treatment unit. There were 2 additional units identified in RCRAInfo: a storage tank unit, and a container storage area. These three units operated under Interim

Status until they were permitted in 1984. In 1990, California verified all three units as having been clean closed. (The information received from the Region varied slightly: a Part A application was submitted in 1980 for three tanks. There was in 1981 a document that mentions the evaporation tanks are new to replace the holding ponds. In 1990, California certified closed drum storage, concrete oily waste tank, sumps, and associated piping.)

Omega Chemical Corporation, CA
CAD042245001

- Proposed to NPL 9/29/1998; Listed on NPL – Final on 1/19/1999
- CERCLA Expenditures: $ 5,510,784
- Hazardous Waste Management – Solvent/Refrigerant Recycling: Omega Chemical Corporation operated from 1976 to 1991. Omega conducted solvent recovery using an on-site fractionation and distillation process and operated as a storage and transfer facility for various hazardous waste classifications. Hazardous wastes stored on site contained mainly chlorinated and aromatic solvents. During its years of operation, drums and bulk loads of waste solvent and chemicals from various industrial activities were processed to form commercial products. Chemical, thermal and physical treatment processes are believed to have been used to recycle and reuse the waste materials. Prior to 1976, the site housed several different industrial operations. These included: a bullet manufacturer (until 1963); a business that converted vans to ambulances (1966 to 1971); and a chemical processing facility (1971 to 1976). Omega also had a refrigerant recycling and treatment operation on-site (under the name Omega Refrigerant Reclamation) which primarily handled hydrocarbons and chlorofluorocarbons.
- Pre and Early RCRA Waste Management: Wastes were stored in tanks, drums, gas cylinders, or placed on the ground. Thousands of drums of hazardous waste were present on-site before a 1995 removal action. The current site is a result of improper waste disposal practices. In March 1995, the owner pleaded guilty to two felony counts of illegal storage and disposal of hazardous wastes.
- Remediation: In 1987, a 500-gallon underground storage tank was removed. During 1995, EPA oversaw removal activities performed by the PRPs (who consisted of hazardous waste generators that sent significant amounts of hazardous materials to the site); these activities included the removal and offsite treatment of more than 3,000 drums of hazardous waste, 60 cubic yards of hardened resin material, hundreds of empty contaminated drums, numerous cylinders and various other smaller containers.
- Bankrupt: Filed for bankruptcy in September of 1991.
- **Financial Assurance:** It is unclear whether or not this site ever maintained financial assurance.
- RCRA Waste Management Activities: Submitted a Part A application in October 1990 for three waste management units: container storage area, tank storage unit, and an "other" type of treatment unit. The units operated under Interim Status. The facility submitted a part B application in 1990, withdrew the application in 1992, and the units were listed as inactive/closing, but not yet RCRA closed in 1992. A closure plan was approved for the units in 1993. (According to the Region, there was a reference to a modified Part A submitted in September 1990, so there may have been another Part A submitted earlier. There is a record of a call from 1982 where there are 2 S01s (Storage Containers), and 7 T04s (Other Treatment units). Also, there is a 1994 document where California Department of

Toxic Substances Control (CA DTSC) noted discrepancies with the units reported and not reported.)

- Cost Recovery: The U.S. Environmental Protection Agency has reached a $10 Million settlement with 170 *de minimis* PRPs (each of whom individually sent less than 10 tons of waste to Omega) that are potentially responsible for pollution at the Omega site.

Casmalia Resources, CA
CAD020748125

- Proposed to NPL 6/14/2001; Listed on NPL – Final on 9/13/2001
- CERCLA Expenditures: $ 20,898,445
- Hazardous Waste Management: Formerly called the Casmalia Resources Hazardous Waste Management Facility, the site is an inactive commercial hazardous waste disposal facility. Between 1973 and 1989, the site's owners and operators accepted more than 5.6 billion pounds of industrial and commercial waste material, which included sludges, pesticides, solvents, acids, metals, caustics, cyanide, and nonliquid polychlorinated biphenyls (PCBs). More than 10,000 companies and government entities sent waste to Casmalia during this period. Facing multiple regulatory enforcement actions, the site's owners and operators stopped taking shipments of waste material in 1989 due to the facility's failure to meet regulatory land disposal requirements. In 1991, the owners and operators abandoned efforts to properly close and clean up the site under the guise of financial difficulties. In September of 1991, DTSC terminated work on the modernization permit application and EPA revoked the facility's Interim Status authorization. Claiming bankruptcy, the owner ceased closure work and all facility maintenance in 1992.
- Pre and Early RCRA Waste Management: Casmalia's 92 waste management facilities which included landfills, ponds, shallow wells, disposal trenches, and treatment units. The following waste management units were used for the storage, treatment, and disposal of the wastes: six unlined landfills (PCB Landfill, Pesticide/Solvent Landfill, Metals Landfill, Caustic/Cyanide Landfill, and Acids Landfill, one additional landfill), seven waste burial trenches (Burial Cells Unit), 11 shallow waste disposal wells, 43 waste storage/evaporation ponds (unlined surface impoundments), 15 evaporation pads (unlined surface impoundments), seven oil field waste spreading areas, and three hazardous waste treatment units.
- Remediation: From 1992 to 1996, EPA used Superfund authorities to take emergency actions to stabilize the site. These actions included installing and operating systems for collecting, treating, and disposing of contaminated subsurface liquids, controlling the flow of storm water, and stabilizing the landfills. Other actions taken at the site include capping one landfill in 1999 (with additional corrective construction in 2001), capping a second landfill in 2001, capping two additional landfills in 2002, installation and operation of a ground water treatment system, and managing numerous surface impoundments.
- PRPs: In 1996, EPA entered into a consent decree with the Casmalia Steering Committee (CSC), a group of 54 major waste generators. Under the consent decree's terms, the CSC is obligated to perform and finance specific aspects of site cleanup, which they have been doing since 1996. EPA pays for other aspects of the site cleanup with funds collected from additional parties that may have liability at the site. In 2003, EPA reached a settlement with the former owners and operators of this site.
- Bankrupt: Filed for bankruptcy in 1992.

- **Financial Assurance:** $12 million in the Trust Fund established for site Closure has been used for remedial expenses at the site.
- Cost Recovery: Although the current estimate for cleaning up the site is $271.9 Million (above the $12 Million in the trust fund), a total of $162.4 Million of this has been recovered [in the form of cash settlements ($89.7 Million) or cleanup work activity agreement value ($72.7 Million)] from PRPs. The CSC, which accounted for approximately 50% of the waste disposed of on-site, agreed to finance Phase 1 cleanup work (estimated at $72.7 Million). The CSC has undertaken the financing and performance of the Phase 1 portion of site work. 454 of the over 1000 *de minimis* waste contributors have settled with EPA for $35.1 Million. 48 non-CSC major parties settled with EPA for $31.8 Million. In 2001, EPA recovered $15.9 Million from the State of California for its part in sending wastes to Casmalia (through various State agencies and departments). In 2002, EPA settled with the site's owners/operators (Casmalia Resources, Hunter Resources, and Kenneth H. Hunter, Jr.) for $6.9 Million. Settlements totaling $18.1 Million with an additional 467 *de minimis* parties have been proposed, and other settlements may occur as well. The $18.1 Million in settlements would bring the total recovered to $180.5 Million.
- RCRA Waste Management: There are 21 regulated units which have been verified to have been in operation: three landfill units, one surface impoundment disposal unit, one surface impoundment treatment area, six surface impoundment storage areas, one land application disposal unit, three tank storage areas, one tank treatment area, one deep well injection disposal unit, and four "other" treatment units. Filed Part A Application in 1980 for the 4 "other" treatment, deep well injection, 3 tank storage, surface impoundment disposal, surface impoundment treatment, and tank treatment units. The Part B was received for all of the regulated units at various times between 1983 and 1987, except for the underground deep injection well (for which a withdrawal request was received in 1983). The 21 regulated units operated under Interim Status standards until 1991. In September of 1991, DTSC terminated work on the facility's permit application and U.S. EPA revoked the facility's interim status authorization to operate under the Resource Conservation and Recovery Act (RCRA). All units have been referred to CERCLA / Federal Superfund Program as of 1995. (According to the Region, as of 1988, Casmalia was listed in the old HWDMS database as having T02 (surface impoundment treatment), S02 (tank storage), D81 (land applications), T01 (tank treatment), T04 (other), and D79 (UIC) units. There were many undated Part A applications in this file. One indicated a landfill, surface impoundments, and tanks. There is another undated Part A that lists 12 units, and the Region thinks this mainly added the neutralization, stabilization, and polishing processes.)

Region 10: 2 Facilities

Pacific Sound Resources, WA

WAD009248287

- Proposed to NPL 5/10/93; Listed on NPL – Final on 5/31/1994
- CERCLA Expenditures: $ 2,138,236
- Wood treatment: Wood preserving activities have occurred at the site between 1909 and 1994. The facility is also known as Wyckoff West Seattle. Primary wood preserving chemicals used on-site include: creosote, creosote mixed with petroleum, zinc meta-arsenic, chromated zinc chloride, wolman salts (fluoride, chromium, arsenic and phenol), pentachlorophenol (PCP), chemonite (copper, arsenic, and zinc salt solution), Pyresote (zinc chloride, boric acid, ammonium sulfate, dichromate). Historical wood preserving operations which have occurred on-site since 1909 have resulted in releases of hazardous contaminants (particularly creosote) into on-site soils, groundwater, and marine sediments. The PSR wood preserving facility discontinued plant operations in August 1994.
- Pre and Early RCRA activities: A significant source of contamination was a "transfer table," where containers were loaded and unloaded. The transfer table was located in a shallow unlined earthen pit known as the "transfer table pit," which was about 3 feet below grade. Treated wood was moved in and out of the retorts by trams. The retorts were partially below grade, and treated product was allowed to cool in below-grade, unlined earth trenches (extensive drippage occurred here). Retort drainage was collected and discharged to a sanitary sewer after pretreatment. Treated product was also allowed to cool/drip directly into Elliott Bay while on the pier. The process areas were subject to flooding at high tide during storm events. Contaminant releases have occurred due to spills, leaks, and on-site waste disposal in former and present process, drip, and storage areas, as well as the transfer table. Another source of hazardous substances at the site is an area adjacent to Elliott Bay where three aboveground tanks were formerly used to store creosote. A major leak occurred at one of the tanks in 1970. In addition, numerous spills occurred over the years from pipelines leading to the tanks. On-site activities also utilized nine retorts, process wastewater operations, containment systems (mostly earth and wood), and a kiln building. Since 1984, EPA has issued several administrative orders under CERCLA, RCRA, and the Clean Water Act (CWA) requiring investigation and cleanup at the site. In 1985, officials pleaded guilty to violations of RCRA for storing hazardous waste at the West Seattle plant without a RCRA permit and violations of CWA for discharging wood preserving residues into a nearby river.
- On January 9, 1990 EPA issued a unilateral 7003/106 Order requiring a number of specific interim actions be taken at the site. This order appears to have been authored by a RCRA compliance inspector. There is no indication that either the facility or any specific units were considered regulated under RCRA. Financial assurance was not required.
- Remediation: In 1990, Subsequent to the RCRA cleanup Order, contaminated soil was excavated from under the transfer table and near the tank farm areas and

stockpiled on the PSR site. Also, these areas were lined with concrete. By March, 1992, the project was being managed by a Superfund site manager. Under CERCLA, EPA conducted two phases of early cleanup actions on the upland portion of the site. During the first phase in 1995, the entire wood treatment facility was demolished and approximately 4,000 cubic yards of highly contaminated soil and process sludge were removed from the site. During the second phase, which began in 1996, a subsurface physical containment barrier (slurry wall) was installed to prevent light non-aqueous phase liquid (LNAPL) migration to Elliott Bay, and to reduce the influence of tidal fluctuation at the site. These early actions also effectively reduced the flow of hazardous constituents from the site into the marine sediments. In 2003, some contaminated sediment and marine pilings were dredged and removed, while other contaminated sediments were capped in-place. As of September 16, 2005, Remedial Action work has finished, and the site is Construction Complete.

- Bankrupt: Although the facility did not file for bankruptcy, EPA entered into a 1994 Consent Decree with Wyckoff (for both the West Seattle/PSR site and the Eagle Harbor site), whereby all outstanding shares of the company stock were given to a trust whose sole purpose was to liquidate the company's assets (including insurance policies, property unrelated to the sites, as well as the 2 sites themselves, and all company rights to sue third parties) in order to pay for cleanup.
- **Financial Assurance: Not Required.**
- RCRA Waste Management: The PSR facility never notified that it was managing hazardous waste. No determination was made through a compliance action that the facility was a RCRA TSDF. The facility is not subject to RCRA storage, closure, or financial assurance requirements. However, the facility notified as a hazardous waste small quantity generator, or SQG (first notified of Generator status in 1994). The facility has been identified as a TSD since it is part of the Corrective Action Workload. No Regulated Units are listed in RCRAInfo
- Cost Recovery: $20 Million has been recovered [in the form of cash settlements ($11 Million) or assets ($9 Million) given to the Port of Seattle for completing cleanup work]. The Wyckoff/PSR principals settled their liability with the United States of America in a 1994 Consent Decree (CD) in which they gave all ownership shares of PSR (i.e., all of PSR's assets) to the CD-created PSR Environmental Trust. Upon entry of the CD, the Trust sold the portion of the site owned by PSR to the Port of Seattle (POS), along with a PPA from EPA, for a commitment from the POS to perform $9 million plus of in-kind environmental work, plus an additional contribution of reimbursable in-kind work directed towards completion of the Upland Groundwater Operable Unit work. The POS implemented this work pursuant to a 1994 AOC with EPA. This work cost approximately $20 million. The Trust reimbursed the POS for its work beyond the $9 million purchase price obligation for the PSR property in accordance with the PPA and AOC. The POS, with The Retec Group, Inc. as its contractor, is continuing to perform reimbursable work at the site pursuant to a supplemental AOC and the PPA.

Taylor Lumber and Treating, OR
ORD009042532

- Proposed to NPL 12/1/2000; Listed on NPL – Final on 6/14/2001
- CERCLA Expenditures: $ 4,935,772
- Wood Treatment: The site was a wood processing and treating business about one mile west of Sheridan, Oregon. The wood treating facility operated from autumn 1966 to summer 2001. The facility's main functions were to condition and pressure-treat wood products with preservatives in order to prolong the useful life of the products. Wood products treated at the facility included lumber, poles, pilings, posts, railroad ties, and plywood. Wood preserving chemicals historically used at this facility include petroleum-based creosote and pentachlorophenol (PCP) solutions. The wood treating chemicals were stored in above-ground storage tanks (ASTs) located on two separate tank farms. From 1982 to 1996, Chemonite, a 3% water-based solution containing arsenic acid, copper salts, zinc, and ammonia, also was used as a wood-preserving chemical at the site. All operations ceased when TLT filed for bankruptcy in 2001. In 2002, Pacific Wood Preserving of Oregon (PWPO) entered into a Prospective Purchaser Agreement with EPA and purchased the wood-treating West Facility, and began wood-treating operations in June 2002. PWPO currently performs wood-treating operations using copper- and borite-based treating solutions (these chemicals have a relatively low environmental impact); they have agreed not to use CCA, PCP, creosote, or ammoniacal copper zinc arsenate. PWPO also operates an extraction system that prevents groundwater pollution from reaching the South Yamhill River.
- Pre and early RCRA Waste Management: Historically, the site has contained two tank farms with at least 13 aboveground storage tanks, a large kiln oven, drip pads, a surface impoundment/vault, several underground storage tanks (USTs), a retort, a pole-drying area, and log storage areas. Numerous violations have occurred at this site over the past decade. In February 1999, 3500 gallons of 5% P-9 oil spilled from the tank farm and collected in drainage ditches. During September 1999, approximately 27,500 gallons of reclaimed creosote and wastewater were released when their tanks topped over, with some contaminated wastewater spilling into nearby ditches. Other drips, spills, and leaks of wood-treating chemicals have resulted in groundwater and soil contamination.
- Remediation: In 2000, EPA did a removal action to reduce environmental risk and control several sources of contamination at the site. About 4,500 tons of contaminated soil was excavated from ditches. This soil was placed in a secure holding cell on the site to prevent off-site contamination and worker exposure. To prevent any further movement of contamination, EPA built a slurry wall and asphalt cap around the main treatment plant and a second cap over a portion of the treated pole storage area.
- Bankrupt: Filed for bankruptcy in summer 2001. (Facility had always been marginally viable.)
- **Financial Assurance:** Financial assurance was a problem according to Region 10. In 1993, EPA issued a complaint under RCRA 3008 for storage and/or

disposal of hazardous waste in a concrete vault/surface impoundment without interim status or a permit. **The complaint included a citation for failure to obtain financial assurance for Closure and Post-Closure.** In 1995, EPA issued a consent decree requiring closure of the surface impoundment. Financial assurance for closure was not included in the consent decree; however, EPA issued a 3008(h) order on consent at that same time, requiring site-wide corrective action, as well as cost estimates and financial assurance for corrective action, a demonstration of ability to pay, and an annual independent financial audit. Region 10's records do not include any financial assurance documents, although their records do indicate that information was received and reviewed regarding the company's financial status and ability to pay.

- EPA issued a second complaint under RCRA 3008 addressing disposal of hazardous waste without a permit or interim status, involving removal of tram carts off of the drip pad sometime after 1997. In 1999, EPA withdrew this complaint in order to provide Taylor an opportunity to focus its efforts and limited financial resources on addressing the environmental problems at its facility. In this manner, Taylor performed a PRP-led Removal Action (initiated in 1999, completed in 2000) before it went bankrupt. CERCLA also conducted a removal action in 2000, and Taylor filed for bankruptcy in 2001.
- RCRA Waste Management Activities: Identified as non-notifier/illegal operator as of 1990. The facility submitted a Part A application in 1991 for one surface impoundment storage unit. This surface impoundment operated under Interim Status until the unit was clean closed in 1996 (Oregon verified closure the same year). Note, after EPA issued drip pad standards in 1990, the facility updated its drip pads. According to the Region, Taylor first notified as a Generator in 1980. In 1990 Taylor became aware that drums of sludge had been buried at the site on or after 1981. These drums were removed in 1990. In 1991, Taylor filed a Part A as a TSD for the surface impoundment storage unit under the 1990 wood-treater rules.
- Baselines: Taylor Lumber was on the 2005 Corrective Action GPRA list, but then it was taken off the 2008 Corrective Action baseline – met both EIs. The facility is part of the Corrective Action Workload and is on the GPRA Post-Closure Baseline.
- Cost Recovery: $500,000 in cash plus $4 Million - $6 Million value of remedial activity privately financed as part of bankruptcy sale (total of $4.5 Million - $6.5 Million cost recovery and future cost avoidance). As part of PWPO's deal to purchase Taylor's assets out of bankruptcy liquidation, EPA received $500,000 and PWPO has agreed to operate a storm water cleaning system and extraction well monitoring and cleaning system, two costly operations which would have otherwise been the responsibility of EPA, funded by taxpayers. It has been estimated that PWPO's assumption of these duties will save taxpayers $4 to $6 million on a net present value basis over the next 20 years.