



437274



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BLVD
CHICAGO, IL 60604

MEMORANDUM

SUBJECT: Request for Approval and Funding for a Time-Critical Removal Action at the Forest City High School Ceramics Factory Site, Forest City, Illinois (Site ID # C5G4)

FROM: Ramon C. Mendoza, OSC
Emergency Response Branch 2, Section 3

THRU: Samuel Borries, Acting Chief
Emergency Response Branch 2

TO: Richard C. Karl, Director
Superfund Division

I. PURPOSE

The purpose of this Action Memorandum is to request and document your approval to expend up to \$544,390 to conduct a time-critical removal action at the Forest City High School Ceramics Factory Site (Site) located in Forest City, Mason County, Illinois. The proposed time-critical removal action herein will mitigate the threats to public health, welfare, and the environment posed by the presence of unsecured asbestos, asbestos containing material (ACM), and lead in waste piles and soils located at the Site. The removal involves a nationally significant issue because the principal contaminant addressed by the removal is ACM. However, no precedent-setting issues are associated with this non-NPL Site.

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

II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID: ILN000510799

RCRA ID:

State ID:

Category: Time-Critical Removal Action

The Site is part of a former public high school campus in a small town in central Illinois. In 1921, the Regional Board of School Trustees for Logan, Menard, and Mason Counties acquired 10 acres of land of which the Site was a part and established the Forest City High School. The high school operated from 1921 to 1984. In 1984, the Regional Board of School Trustees sold approximately 4.6 acres of the original 10 acres to Mr. Dale Schurtz, Mr. Marion Schurtz, and Ms. Yvonne Schurtz. The remaining 5.4 acres of the property were deeded to the Village of Forest City, and this property currently serves as a park. From 1984 to 1999, Dale Schurtz used the Site to manufacture and sell ceramic products. A tornado hit the Site in 2003 and a second tornado hit again in 2005, severely damaging two buildings at the Site and exposing debris containing asbestos and lead to the environment.

The Site currently contains three buildings. School Building 1, built in 1921, is a two-story brick building that contained the school cafeteria, offices, a boiler room, and classrooms. Building 1 was partially destroyed by a tornado in 2005. The roof and much of the second and first floor have collapsed, and the building is not structurally stable. Roofing material from this building was observed on the ground outside the building.

School Building 2, built in 1962, is a one-story brick and concrete masonry building that contained a gym, two locker rooms, bathrooms, a boiler room, and four classrooms. The roof of Building 2 was heavily damaged by a tornado in 2003. The building is in a dilapidated state, and many of the windows are broken. In addition, asbestos floor and ceiling tiles, solid waste, ceramic manufacturing materials, and miscellaneous building debris are scattered throughout the building.

School Building 3 is a Quonset Building that was built in the 1950s when the high school consolidated with the area's junior high school. The Quonset Building is a two-story sheet-metal building containing eight rooms, a woodworking room, a ceramic storeroom, a boiler room, a living area, and several former classrooms currently used as storage rooms. During the site assessment, the rooms contained piles of miscellaneous personal items belonging to the current owner, as well as ceramic manufacturing materials.

Based on historical operations at the Site, contaminants of concern include, but are not limited to, asbestos, volatile organic compounds (VOC), semi-volatile organic compounds (SVOC), ignitable liquids, and metals.

Reportedly, the Village of Forest City police frequently respond to calls about trespassing, unauthorized salvaging, and vandals at the Site.

A. Site Description

1. Removal site evaluation

The EPA Region 5 Brownfields Program conducted a Phase I Environmental Site Assessment in April 2012, and documented the presence of ACM, heavy metals, USTs, and the destruction caused by the two tornadoes to two of the Site's buildings. The Site was referred by the Brownfields Program to the Superfund Division Removal Branch in May 2012.

A removal site evaluation was conducted in June 2012, and documented the following site conditions:

Asbestos

Building 1: Asbestos was detected in roofing material observed on the ground on the north side of the building. Asbestos was also detected in the pipe insulation in the building. Soil samples collected north of the building contained asbestos at 1 to 5 percent chrysotile asbestos, indicating that asbestos has been released and or migrated outside of the building. The building's top floor and roof have collapsed.

Building 2: Asbestos was detected in black floor tile, grey floor tile, white floor tile, pipe insulation, black sink undercoating, chemistry laboratory benches, and boiler room tank insulation inside the building. A pile of pipeline insulation that had fallen on the gym floor contained asbestos at 10 to 15 percent chrysotile asbestos.

Quonset Building: Asbestos was detected in the wall plaster and thermal system insulation from the building.

Lead and other metals in abandoned containers and soil from ceramics manufacturing:

Samples were collected from some of the approximately three cubic yards of small abandoned containers (4 ounces or less) from ceramic manufacturing activities at the Site. These containers appear to be spent or non-used glazes, paints, glosses, lusters, and other products related to the manufacture of ceramic products. These containers were observed in multiple rooms in Building 2.

Labels on these containers indicated many of these materials contained heavy metals, including lead and cadmium, solvents, including toluene, turpentine, xylene, methyl ethyl ketone (MEK), and 1,1,1-trichloroethane. Waste liquid sample results indicated barium, cadmium, lead, and silver at 513; 49.4; 266,000; and 12.16 milligrams per liter (mg/L), respectively. These concentrations exceed the toxicity characteristic limits listed in 40 C.F.R. § 261.24 of 100, 1, 5, and 5 mg/L for barium, cadmium, lead, and silver, respectively. Another waste liquid sample contained lead at 24,000 mg/L. According to 40 C.F.R. § 261.24, these wastes exhibit the characteristic of toxicity, therefore, constitute hazardous waste.

Soil samples collected around the Site contained lead at 2,500; 1,100; and 830 mg/kg. These samples exceed the residential and industrial EPA Regional Soil Screening Levels for lead, which are 400 (residential) and 800 (industrial) mg/kg, respectively. In addition, Site soil lead concentrations exceeded the Illinois Environmental Protection Agency's (Illinois EPA) soil

screening criteria under the *Tiered Approach to Corrective Action (TACO)* Tier 1 for Residential and Industrial/Commercial ingestion standards (400 mg/kg and 800 mg/kg, respectively).

2. Physical location

The Site is located at 409 Southwest Main Street in the Village of Forest City, Mason County, Illinois (Figure 1). The Site's geographical coordinates are 40° 21' 59.76" North latitude and 89° 50' 5.28" West longitude. The Site occupies approximately 4.6 acres, and contains the former Forest City High School and ceramics factory. The Site is in a rural residential area, bordered to the north by forested and agricultural land; to the east by a park; to the south by South Main Street, the Illinois and Midland Railroad, a private residence, and agricultural land; and to the west by forested land and a vacant commercial property. The closest residences are located approximately 1/4 mile northeast of the Site. The Site is located within the Lower Illinois-Lake Chautauqua watershed. The closest waterway is the southwest flowing Mason-Tazewell Drainage Ditch approximately 0.2 mile south of the Site.

The weather is average for Illinois. However, historical tornado activity in the Forest City area is above the Illinois state average, and is 176% greater than the overall U.S. average (Source: <http://www.city-data.com/city/Forest-City-Illinois.html>).

The area surrounding the Site was screened for Environmental Justice (EJ) concerns using Region 5's EJ Assist Tool (which applies the interim version of the national EJ Strategic Enforcement Assessment Tool (EJSEAT)). Census tracts with a score of 1, 2 or 3 are considered to be high-priority potential EJ areas of concern. The Site is in a census tract with a score of 9. Therefore, Region 5 does not consider this Site to be a high-priority potential EJ area of concern. Refer to the attached analysis for additional information (Attachment 1).

3. Site characteristics

The Site is mostly abandoned, and is currently privately owned. No removal actions have been taken.

Building 1 was partially destroyed by a tornado in 2005. The roof of this building and much of the second and first floor have collapsed, and the building is not structurally stable. Roofing material and other debris from this building was observed on the ground outside the building.

Building 2 was heavily damaged by a tornado in 2003. The building is in a dilapidated state, with broken windows, a heavily damaged roof. In addition, floor and ceiling tiles, solid waste, ceramic manufacturing materials, and miscellaneous building debris are scattered throughout the building. The Quonset Building is being used for storage by the current owner, and is locked and unoccupied.

There are no effective controls to limit access to Buildings 1 and 2 from trespassers. In addition, the condition of these buildings allows the wind and other weather factors to mobilize contaminants. Based on the results of the removal site evaluation, asbestos from ACM and lead have been released from the Site buildings into the surrounding soils.

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

The Site presents a release, threatened and ongoing release of hazardous substances. Tornadoes have severely damaged two of the buildings at the Site to the extent that it is impossible to prevent the release of lead and asbestos into the environment under current Site conditions.

Building 1 contains asbestos and lead building materials. Its roof and second floor have collapsed, and it is structurally unsound. Building 2 contains asbestos pipe insulation and thousands of used asbestos floor tiles removed from the floor and hallways and piled up inside the building. In addition, there are approximately three cubic yards of small abandoned containers (4 ounces or less) from ceramic manufacturing, containing liquids and metals at concentrations constituting hazardous waste. Asbestos was also detected in the wall plaster and thermal system insulation from the Quonset Building. Soil Samples collected outside the Site buildings contained lead and asbestos at concentrations that exceed the residential and industrial EPA Regional Soil Screening Levels.

In summary, buildings on the Site contain substantial quantities of asbestos and lead at hazardous concentrations. Asbestos and lead as well as other hazardous substances have been released into the environment. The Site has no secure fencing or other deterrent to limit access or warn the public of the potential hazards at the Site. Buildings 1 and 2 are in dilapidated condition, with broken windows and collapsed roofs, and are accessible to trespassers. Weather conditions can mobilize the asbestos and lead, causing it to be released into the environment.

5. NPL status

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

6. Maps, pictures and other graphic representations

Figure 1, Site Location Map.

Figure 2, Site Layout Map

Attachment 1, Environmental Justice Analysis

Attachment 2, Detailed Cleanup Contractor Cost Estimate

Attachment 3, Independent Government Cost Estimate

Attachment 4, Administrative Record

B. Other Actions to Date

1. Previous actions

No significant response actions have been taken at the Site by local or state authorities. The owner has placed locks on Building 1 and the Quonset Building. The locks have not prevented

trespassing from occurring, nor do they prevent asbestos or lead from being released to the environment.

2. Current actions

No current response actions by the owner, State or local authorities are underway at the Site.

C. State and Local Authorities' Roles

1. State and local actions to date

No State or local response actions have been taken to address the asbestos and lead hazardous substance releases at the Site. This Site was originally under the responsibility of the Illinois EPA's State Sites Unit (SSU). The Site was placed in the database in 2011, and is listed as an abandoned school with asbestos. The status of the Site is "backlog" meaning the SSU plans to address the Site in the future but does not have the resources (personnel and/or monetary) to work on the Site at this time.

2. Potential for continued State/local response

Illinois EPA and the local government do not have the resources at this time to address the release of asbestos and lead to the environment at the Site. In a letter sent to EPA dated June 29, 2012, the Forest City Village President and Village Board requested assistance and stated that neither the Village nor the current owner (Dale Shurtz) has the funds to address the asbestos and lead contamination at the Site.

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

The conditions present at the Site present a substantial threat to the public health or welfare, and the environment, and meet the criteria for a time-critical removal action as provided for in the NCP, 40 C.F.R. § 300.415(b). These criteria include, but are not limited to, the following:

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

During the site assessment, EPA found large volumes of asbestos and lead contamination in three buildings at the Site. Two of the buildings have been largely destroyed by tornadoes, are unsecured, and are exposed to the environment. In addition, soil samples outside of the buildings confirm that asbestos and lead have been released into the environment. Lead and asbestos are hazardous substances under CERCLA. The Site is not adequately secured, and local authorities have reported incidents of trespassers at the Site. The Site is located in a rural residential area, is adjacent to a picnic/park area, and is about ¼ mile from the closest homes.

Soil Samples collected outside of Building 1 contained 1 to 5 percent chrysotile asbestos, indicating that asbestos has been released and or migrated outside of the building. In Building 2, asbestos was detected in used floor tiles removed from the floor and hallways and piled up in the

building. Pipe and boiler insulation contained asbestos at 10 to 15 percent chrysotile asbestos. Labels on the hundreds of spent and abandoned containers from ceramics manufacturing found in Building 2 indicated many of these materials contained heavy metals, including lead and cadmium, and solvents, including toluene, turpentine, xylene, methyl ethyl ketone (MEK), and 1,1,1-trichloroethane. Waste liquid sample results indicate barium, cadmium, lead, and silver at concentrations that constitute hazardous waste under 40 C.F.R. § 261.24.

Soil Samples collected outside of the Site buildings contained lead at 2,500; 1,100; and 830 mg/kg, respectively. These exceed the residential and industrial EPA Soil Screening Levels for lead which are 400 (residential) and 800 (industrial) mg/kg, respectively.

According to the Agency for Toxic Substances and Disease Registry (ATSDR) ToxFAQ, lead can affect almost every organ and system in the body. The main target for lead toxicity is the nervous system, both in adults and children. Long-term exposure of adults can result in decreased performance in some tests that measure functions of the nervous system. It may also cause weakness in fingers, wrists, or ankles. Lead exposure also causes small increases in blood pressure, particularly in middle-aged and older people and can cause anemia. Exposure to high lead levels can severely damage the brain and kidneys in adults or children and ultimately cause death. In pregnant women, high levels of exposure to lead may cause miscarriage. High level exposure in men can damage the organs responsible for sperm production (ATSDR, 2007b).

Chrysotile, as well as other forms of asbestos, is considered to be a human carcinogen by EPA's Integrated Risk Information System (IRIS), the Department of Health and Human Services (DHHS) and the International Agency for Research on Cancer (IARC).

Asbestos is the name given to a number of naturally occurring fibrous minerals with high tensile strength, the ability to be woven, and resistance to heat and most chemicals. Because of these properties, asbestos fibers have been used in a wide range of manufactured goods, including roofing shingles, ceiling and floor tiles, paper and cement products, textiles, coatings, and friction products such as automobile clutch, brake, and transmission parts.

Exposure to airborne friable asbestos may result in a potential health risk because persons breathing the air may breathe in the asbestos fibers. Chronic inhalation exposure to excessive levels of asbestos fibers suspended in air can result in lung disease such as asbestosis, mesothelioma, and lung cancer. Sub acute exposures as short as a few days have been shown to cause mesothelioma.

According to ATSDR asbestos mainly affects the lungs and the membrane that surrounds the lungs. Breathing high levels of asbestos fibers for a long time may result in scar-like tissue in the lungs and in the pleural membrane (lining) that surrounds the lung. This disease is called asbestosis and is usually found in workers exposed to asbestos, but not in the general public. People with asbestosis have difficulty breathing, often a cough, and in severe cases heart enlargement. Asbestosis is a serious disease and can eventually lead to disability and death. ATSDR also indicates that breathing lower levels of asbestos may result in changes called plaques in the pleural membranes. Pleural plaques can occur in workers and sometimes in people living in areas with high environmental levels of asbestos. Effects on breathing from

pleural plaques alone are not usually serious, but higher exposure can lead to a thickening of the pleural membrane that may restrict breathing.

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

Soil Samples collected outside of the Site buildings contained lead at 2,500; 1,100; and 830 mg/kg, respectively. These samples exceed the residential and industrial EPA Regional Soil Screening Levels for lead which are 400 (residential) and 800 (industrial) mg/kg, respectively. In addition, soil samples collected outside of Building 1 contained 1 to 5 percent chrysotile asbestos, indicating that asbestos has been released and or migrated outside of the building. Based on the information available, the most likely sources for these hazardous substances are the ACM in Buildings 1 and 2 and lead-contaminated ceramic factory waste in Building 2. The soil samples were surface composites, indicating that the lead and asbestos are in surface soils and can be mobilized.

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

Buildings 1 and 2 are heavily damaged from tornadoes and are exposed to the environment. The roof of Building 1 and much of the second and first floor have collapsed and the building is not structurally stable. Roofing material from this building was observed on the ground outside the building. Building 2 is in a dilapidated state, with floor and ceiling tiles, solid waste, ceramic manufacturing materials, and miscellaneous building debris scattered throughout the building. Many of the windows of Building 2 are broken, and the roof of the gym has been partially destroyed and now leaks. Both buildings contain ACM, and Building 2 contains lead-contaminated waste from the former ceramics factory.

The site assessment found asbestos and lead outside of the buildings in soil, indicating that these hazardous substances have migrated from inside the buildings and released into the environment.

The weather at the Site is average for Illinois. However, the Forest City-area historical tornado activity is above Illinois state average, and is 176% greater than the overall U.S. average (Source: <http://www.city-data.com/city/Forest-City-Illinois.html>). It is not unreasonable to assume that severe weather may impact the Site. Normal weather conditions, such as snow, rain and wind, will continue to be the main factor of hazardous substance release and migration at the Site, and pose a real threat to nearby populations.

Threat of fire or explosion.

According the Forest City Village President, there have been several incidents with vandals at the Site. The Site cannot be adequately secured from trespassers because of the dilapidated condition of Buildings 1 and 2. There is a reasonable threat of arson from vandals at the Site. A fire at the Site would release asbestos and lead from the smoke plume into the surrounding residential community.

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

In a letter sent to EPA on June 29, 2012, the Forest City Village President and Village Board requested assistance and stated that neither the Village or the current owner (Mr. Shurtz) has the funds to address the asbestos and lead contamination at the Site. Based on the information currently available, neither the State, owner or Village have the funds or resources at this time to respond to a time-critical removal action of this magnitude.

IV. ENDANGERMENT DETERMINATION

Given the Site conditions, the nature of the known and suspected hazardous substances on Site, and the potential exposure pathways described in Sections II and III above, actual or threatened releases of hazardous substances from this Site, if not addressed by implementing the response actions selected in this Memorandum, may present an imminent and substantial endangerment to public health, or welfare, or the environment

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed action description

The response actions described in this memorandum directly address actual or potential releases of hazardous substances on Site, which may pose an imminent and substantial endangerment to public health, or welfare, or the environment. Removal activities on Site will include:

- 1) Develop and implement a Site Health and Safety Plan to include a Perimeter Air Monitoring and Sampling Plan and develop measures to control ACM and lead dust during the removal and deconstruction of the facility;
- 2) Develop a site specific sampling plan, to conduct additional characterization of the Site to determine the nature and extent of lead and asbestos contamination in soil to support the removal action;
- 3) Inventory and characterize all substances contained in drums and containers;
- 4) Consolidate and package all hazardous substances, pollutants and contaminants for transportation and off-site disposal;
- 5) Excavate soil contaminated with lead (greater than 400 mg/kg) located at the Site and surrounding soil;

- 6) Excavate soil contaminated with asbestos in and around the Site that presents an unacceptable risk to public health and the environment;
- 7) Transport and dispose of all characterized or identified hazardous substances, pollutants, wastes, or contaminants that pose a substantial threat of release at a RCRA/CERCLA-approved disposal facility;
- 8) As necessary, deconstruct Buildings 1 and 2 at the Site to excavate, recycle, load, transport, and dispose of readily identifiable ACM and lead-contaminated wastes, debris and underlying soil. All hazardous material will be disposed of at EPA-approved disposal facilities in accordance with EPA's Off-Site Rule (40 C.F.R. § 300.440);
- 9) Post-confirmation sampling will be conducted in accordance with the site specific sampling plan to confirm efficacy of the removal actions.
- 10) Backfill excavated areas with clean material and topsoil. Restore excavated and disturbed areas and vegetate to prevent soil erosion.

The removal action will be conducted in a manner not inconsistent with the NCP. The OSC has initiated planning for provision of post-removal Site control consistent with the provisions of Section 300.415(l) of the NCP.

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

Off-Site Rule

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

2. Contribution to remedial performance:

The proposed action will not impede future actions based on available information. No long-term remedial actions are anticipated for the site.

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

Not Applicable.

4. Applicable or relevant and appropriate requirements (ARARs)

All applicable, relevant and appropriate requirements (ARARs) of federal and State law will be complied with to the extent practicable considering the exigencies of the circumstances.

Federal

EPA National Emissions Standards for Hazardous Air Pollutants at 40 C.F.R. Part 61, Subparts A and M.

State

On August 24, 2012, a letter was e-mailed to Bruce Everetts of Illinois EPA asking for any State of Illinois ARARs which may apply. All state and federal ARARs identified in a timely manner will be complied with to the extent practicable during this removal action.

5. Project Schedule

The removal activities are expected to take approximately 45 on-site working days to complete.

B. Estimated Costs

REMOVAL ACTION PROJECT CEILING ESTIMATE	
<u>Extramural Costs:</u>	
<u>Regional Removal Allowance Costs:</u>	
Total Cleanup Contractor Costs (This cost category includes estimates for ERRS, subcontractors, Notices to Proceed, and Interagency Agreements with Other Federal Agencies. Include a 15% contingency)	\$ 388,383
<u>Other Extramural Costs Not Funded from the Regional Allowance:</u>	
Total START, including multiplier costs	\$ 85,000
Total Decontamination, Analytical & Tech. Services (DATS)	\$ 0
Total CLP	\$ 0
Subtotal	\$85,000
Subtotal Extramural Costs	\$473,383
Extramural Costs Contingency (15% of Subtotal, Extramural Costs)	\$71,007
TOTAL REMOVAL ACTION PROJECT CEILING	\$ 544,390

The response actions described in this memorandum directly address actual or threatened releases of hazardous substances, pollutants, or contaminants at the Site which may pose an imminent and substantial endangerment to public health and safety and the environment. These

response actions do not impose a burden on the affected property disproportionate to the extent to which that property contributes to the conditions being addressed.

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

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

VII. OUTSTANDING POLICY ISSUES

The removal involves a nationally significant issue because the principal contaminant addressed by the removal is asbestos-containing materials.

VIII. ENFORCEMENT

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

The total EPA costs for this removal action based on full-cost accounting practices that will be eligible for cost recovery are estimated to be \$967,429.¹

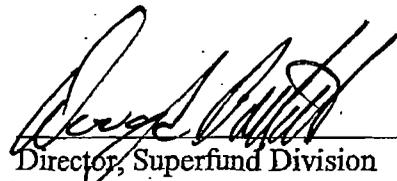
$$(\$544,390 + \$50,000) + (62.76\% \times \$594,390) = \$967,429$$

¹ Direct Costs include direct extramural costs and direct intramural costs. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of site-specific direct costs, consistent with the full cost accounting methodology effective October 2, 2000. These estimates do not include pre-judgment interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual total costs from this estimate will affect the United States' right to cost recovery.

IX. RECOMMENDATION

This decision document represents the selected removal action for the Forest City High School Ceramics Factory Site, Forest City, Mason County, Illinois, developed in accordance with CERCLA as amended, and is not inconsistent with the NCP. This decision is based on the administrative record for the Site (Attachment 4). Conditions at the Site meet the NCP Section 300.415(b) criteria for a removal and I recommend your approval of the removal action proposed in this Action Memorandum.

The total project ceiling if approved will be \$544,390, of which an estimated \$459,390 may be used for cleanup contractor costs. You may indicate your approval by signing below.

Approve:  10/3/2002
Director, Superfund Division Date

Disapprove: _____
Director, Superfund Division Date

Enforcement Addendum

- Figure 1 Site Location Map
- Figure 2 Site Layout Map

Attachments:

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

- cc: S. Fielding, U.S. EPA 5104A
L. Nelson, U.S. Department of Interior, **w/o Enf. Attachment**
(email: Lindy_Nelson@ios.doi.gov)
B. Everetts, Illinois EPA, **w/o Enf. Addendum**
(email: bruce.everetts@illinois.gov)
V. Darby U.S. DOI
(email: valincia_Darby@ios.doi.gov)

BCC PAGE
(REDACTED 1 PAGE)

ENFORCEMENT ADDENDUM

FOREST CITY HIGH SCHOOL SITE
FOREST CITY, MASON COUNTY, ILLINOIS

AUGUST 2012

ENFORCEMENT CONFIDENTIAL
NOT SUBJECT TO DISCOVERY

FOIA EXEMPT

(REDACTED 3 PAGES)

ENFORCEMENT CONFIDENTIAL
NOT SUBJECT TO DISCOVERY

**Figure 1
Site Location Map**

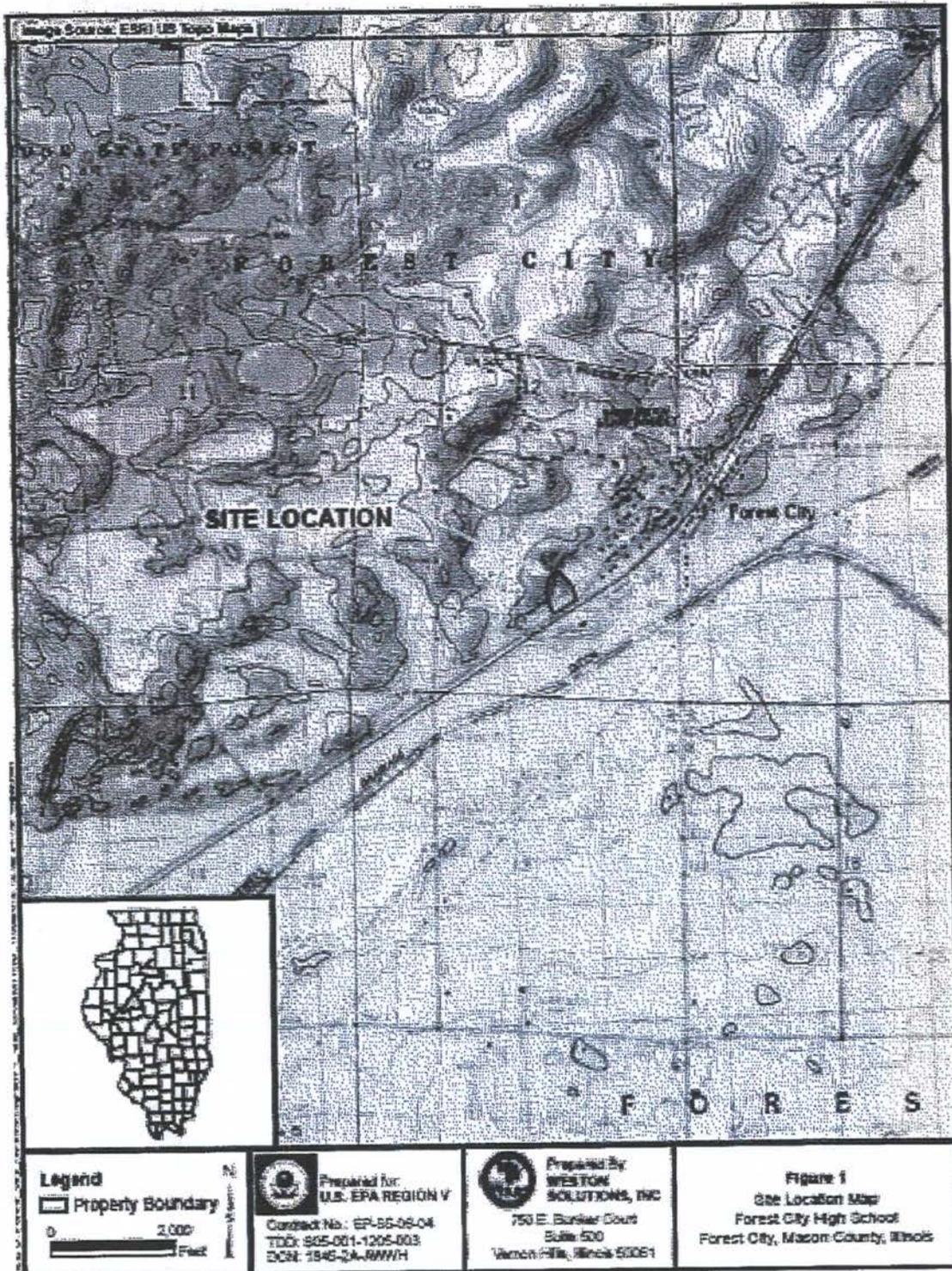
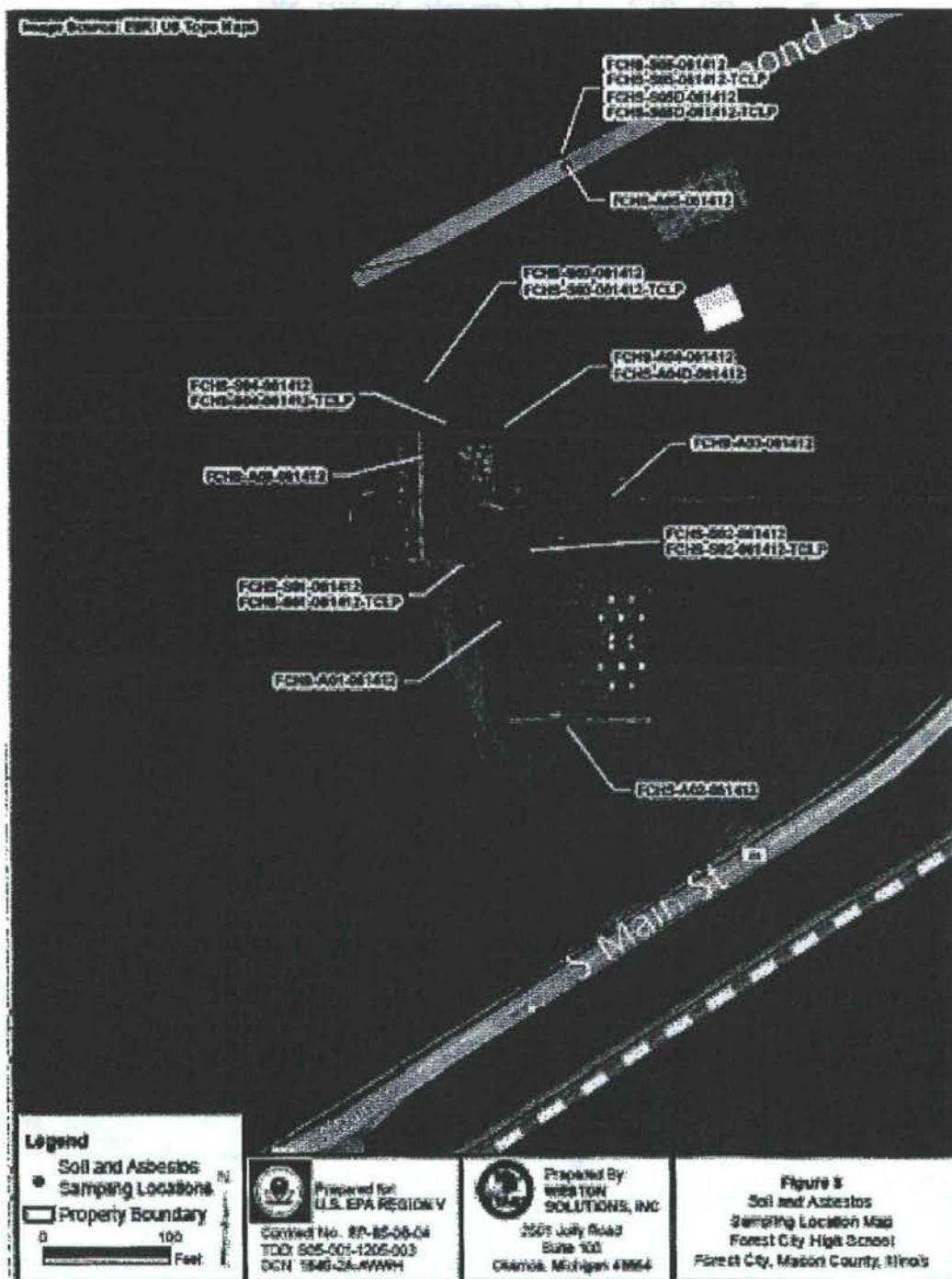


Figure 2
Site Aerial/Sample Location Map

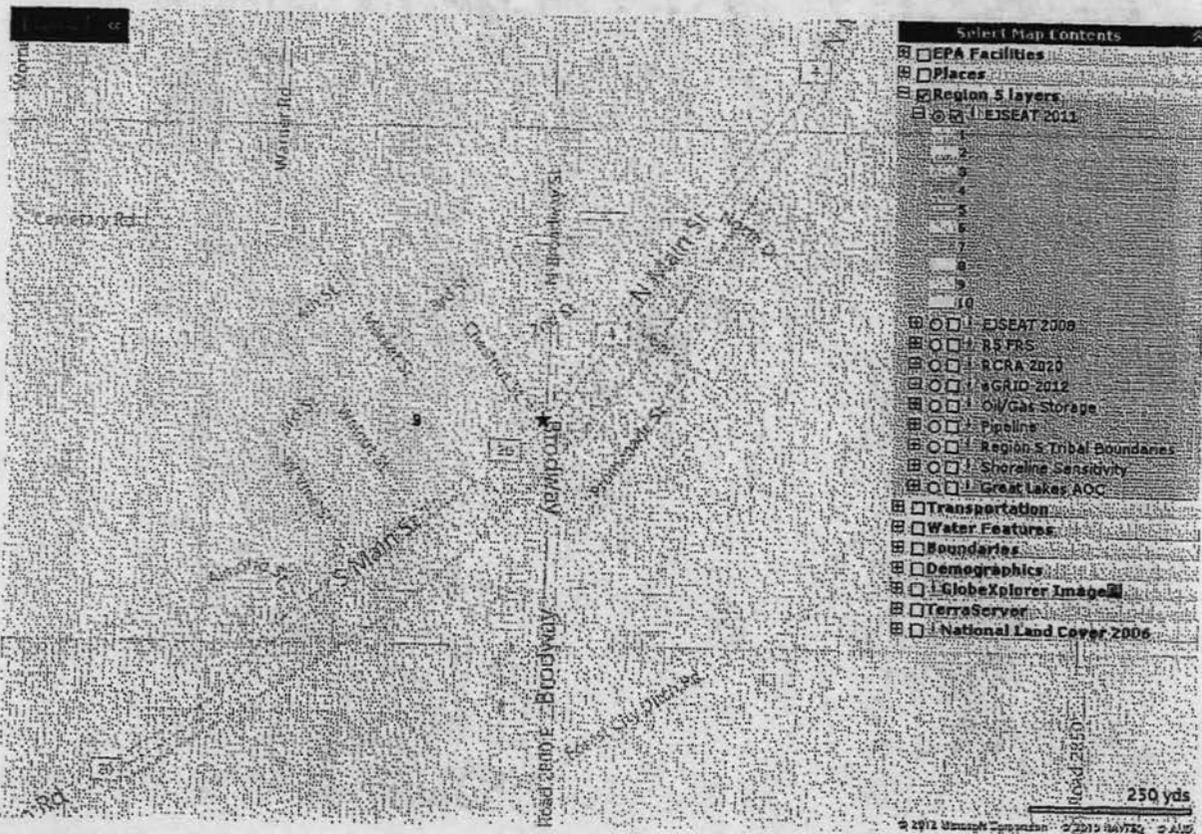


ATTACHMENT 1

Environmental Justice Analysis Forest City High School Ceramics Factory Site Forest City, IL, August 2012

The area surrounding the Forrest City High School Ceramics Factory Site was screened for Environmental Justice (EJ) concerns using Region 5's EJ Assist Tool (which applies the interim version of the national EJ Strategic Enforcement Assessment Tool (EJSEAT)). Census tracts with a score of 1, 2 or 3 are considered to be high-priority potential EJ areas of concern according to EPA Region 5. The Site is in a census tract with a score of 9. Therefore, Region 5 does not consider this Site to be a high-priority potential EJ area of concern.

Forest City High School Ceramics Factory Site Map Showing EJ SEAT Values for Surrounding Area



ATTACHMENT 2

DETAILED CLEANUP CONTRACTOR AND START ESTIMATE

**FOREST CITY HIGH SCHOOL CERAMICS FACTORY SITE
FOREST CITY, MASON COUNTY, ILLINOIS**

(REDACTED 1 PAGE)

NOT RELEVANT TO THE SELECTION OF THE REMOVAL ACTION

ATTACHMENT 3

INDEPENDENT GOVERNMENT COST ESTIMATE

**FOREST CITY HIGH SCHOOL CERAMICS FACTORY SITE
FOREST CITY, MASON COUNTY, ILLINOIS
AUGUST 2012**

(REDACTED 2 PAGES)

NOT RELEVANT TO THE SELECTION OF THE REMOVAL ACTION

ATTACHMENT 4

**U.S. Environmental Protection Agency
Removal Action
Administrative Record
For Forest City High School Ceramics Factory Site
Forest City, Mason County, Illinois**

**Original
August 2012**

No.	Date	Author	Recipient	Title/Description	Pages
1	7/30/12	WESTON SOLUTIONS	U.S.EPA	Site Assessment Report For The Forest City High School Site	123
2	5/4/12	WESTON SOLUTIONS	U.S. EPA	Draft Phase 1 Environmental Site Assessment Report for Forest City High School Site 409 Southwest Main St. Forest City, Mason County, IL (Brownfields)	235
3	00/00/00	Mendoza.R., U.S. EPA	Karl, R., U.S. EPA	Action Memorandum: Request for Approval and Funding for a Time-Critical Removal Action at the Forest City High Shool Ceramics Factory Site (PENDING)	