



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7  
901 NORTH 5TH STREET  
KANSAS CITY, KANSAS 66101

MAY 17 2010

**ACTION MEMORANDUM AMENDMENT**

**SUBJECT:** Request for an Increase in Project Ceiling at the West Highway 6 & Highway 281 Site (a.k.a. Dana Corp), Adams County, Hastings, Nebraska

**FROM:** Randy Schademann, On-Scene Coordinator  
Planning and Preparedness North Section

**THRU:** Don Lininger, Chief  
Planning and Preparedness North Section

**TO:** Cecilia Tapia, Director  
Superfund Division



Site ID#: A76N  
CERCLIS ID#: NEN000704738  
Nationally Significant/  
Precedent Setting: No  
Category of Removal: Time-critical

**I. PURPOSE**

The purpose of this Action Memorandum Amendment is to request approval for an increase in the project ceiling for a fund-lead, time-critical removal action at the West Highway 6 & Highway 281 Site (a.k.a. Dana Corp or the Site), Adams County, Hastings, Nebraska. The scope has not changed for the Site from the Action Memorandum approved on July 6, 2006, which proposed the U.S. Environmental Protection Agency's (EPA's) assumption of operation of existing soil vapor extraction (SVE) and groundwater extraction systems. Activities in this action will include enhancements or system modifications, scheduled sampling to determine system efficiency, the operational costs of the systems (i.e., electricity, gas, water), and daily systems checks.

The aforementioned systems will be operated under this Action Memorandum Amendment until such time as the Remedial Investigation/Feasibility Study (RI/FS) is completed, a Record of Decision (ROD) is finalized, and on-site construction is begun. It is anticipated that construction of the selected remedy will be in early 2011.

## **II. SITE CONDITIONS AND BACKGROUND**

### **A. Site Description**

#### **1. Removal Site Evaluation**

See previously approved Action Memorandum dated July 6, 2006.

#### **2. Physical Location**

See previously approved Action Memorandum dated July 6, 2006.

#### **3. Site Characteristic**

See previously approved Action Memorandum dated July 6, 2006.

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

See previously approved Action Memorandum dated July 6, 2006.

#### **5. NPL Status**

See previously approved Action Memorandum dated July 6, 2006.

#### **6. Maps, Pictures and other Graphic Representations**

See previously approved Action Memorandum dated July 6, 2006.

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

#### **1. Previous Actions**

See previously approved Action Memorandum dated July 6, 2006.

Also, since July 2006, the following actions have been taken:

- An air stripper was installed to treat the groundwater (previously, the water was being discharged to Hastings sewer for treatment at the utilities plant). Treated water is now being discharged to an on-site pond via an underground pipe that was installed as part of this action.
- The aforementioned pond was excavated to allow for additional storage capacity and facilitate groundwater infiltration.
- Sampling of the monitoring well network (42 wells) roughly three times a year. Sampling of the SVE and groundwater extraction wells (8 wells total) roughly quarterly.

- Almost continuous operation of the the SVE and groundwater extraction system. Several pumps and motors were replaced in the groundwater extraction network and a hydrant was added to one well to facilitate sampling.
- Almost daily system checks by a local engineer.

## **2. Current Actions**

This Action Memorandum Amendment will allow for the continued operation and monitoring of the SVE and groundwater extraction systems.

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

### **1. State and Local Actions to Date**

See previously approved Action Memorandum dated July 6, 2006.

### **2. Potential for Continued State/Local Response**

See previously approved Action Memorandum dated July 6, 2006.

## **D. Community Involvement Activities**

See previously approved Action Memorandum dated July 6, 2006.

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

See previously approved Action Memorandum dated July 6, 2006.

## **IV. PROPOSED ACTIONS AND ESTIMATED COSTS**

### **A. Proposed Actions**

#### **1. Proposed Action Description**

This Action Memorandum Amendment will allow for the continued operation and monitoring of the SVE and groundwater extraction systems.

#### **2. Contribution to Remedial Performance**

See previously approved Action Memorandum dated July 6, 2006.

#### **3. Description of Alternative Technologies**

See previously approved Action Memorandum dated July 6, 2006.

**4. Applicable or Relevant and Appropriate Requirements (ARARs)**

Federal

See previously approved Action Memorandum dated July 6, 2006.

State

See previously approved Action Memorandum dated July 6, 2006.

**5. Project Schedule**

Approval of this Action Memorandum Amendment will allow for uninterrupted operation and maintenance of the systems.

**B. Estimated Costs**

	<u>Current Ceiling</u>	<u>Proposed Increase</u>	<u>Amended Ceiling</u>
Extramural Costs	\$ 410,000	\$ 150,000	\$ 560,000
Extramural Cost Contingency	<u>82,000</u>	<u>20,000</u>	<u>102,000</u>
Subtotal, Extramural Cost	\$ 492,000	\$ 170,000	\$ 662,000

EPA direct and indirect costs, although cost recoverable, do not count toward the Removal Ceiling for this removal action. Refer to the enforcement section for a breakout of these costs.

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

See previously approved Action Memorandum dated July 6, 2006.

**VI. EXEMPTION FROM STATUTORY LIMITS**

**12-Month Exemption**

See previously approved Action Memorandum dated July 6, 2006.

**VII. OUTSTANDING POLICY ISSUES**

None.

## VIII. ENFORCEMENT

See attached Confidential Enforcement Addendum for this site in the previously approved Action Memorandum dated July 6, 2006. For NCP consistency purposes, it is not part of this Action Memorandum Amendment.

The total EPA costs for this removal action based on full cost-accounting practices are estimated to be:

	<u>Current</u> <u>Project Costs</u>	<u>Proposed</u> <u>Increase</u>	<u>Amended</u> <u>Project Costs</u>
EPA Intramural Costs	\$ 50,000	\$ 27,000	\$ 77,000
EPA Extramural Costs	492,000	170,000	662,000
EPA Indirect *	<u>274,740</u>	<u>57,588</u>	<u>332,328</u>
Total Project Costs	\$816,740	\$254,588	\$1,071,328


\* Indirect rate changed from 50.60 percent to 44.97 percent since the previously approved Action Memorandum dated July 6, 2006; 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 prejudgment interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of the 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 costs from this estimate will affect the United States' right to cost recovery.

## IX. RECOMMENDATION

This decision document represents the selected removal action for addressing the hazardous substances, pollutants, or contaminants present at the site. The removal action was 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.

The conditions at the site meet NCP section 300.415(b) criteria for a removal action. If this increase is approved, the removal action ceiling will be \$662,000. These funds will come from the regional removal allowance.

Approved:

  
Cecilia Tapia, Director  
Superfund Division  
Region VII

5/17/10  
Date