



U.S. ENVIRONMENTAL PROTECTION AGENCY  
OFFICE OF INSPECTOR GENERAL

*Catalyst for Improving the Environment*

## Public Liaison Report

# Follow-up Review on Progress at Escambia Treating Company Superfund Site, Pensacola, Florida

Report No. 08-P-0200

July 14, 2008



**Report Contributors:** Paul McKechnie  
Dan Cox  
Tom Reilly  
John Coll

## **Abbreviations**

CATE	Citizens Against Toxic Exposure
CD	Compact Disk
EPA	U.S. Environmental Protection Agency
OIG	Office of Inspector General

**Cover photo:** The contaminated soil mound contained within a high density polyethylene cap at the Escambia Treating Company Superfund site. (Photo taken by OIG staff in October 2007)



# At a Glance

*Catalyst for Improving the Environment*

## Why We Did This Review

We conducted this review to determine whether U.S. Environmental Protection Agency (EPA) Region 4 implemented the recommendations in our September 2004 report on the Escambia Treating Company Superfund site, Pensacola, Florida. We also examined the current status of site clean-up and whether EPA was effectively communicating site clean-up plans and actions with residents, local businesses, and city and county governments.

## Background

The Escambia site is an abandoned wood preserving facility where various health risks were identified and from which about 358 households were permanently relocated. In September 2004, we reported on the status of EPA's clean-up planning for the site, relocation of home owners, and community relations activities. We had made several recommendations in that prior report.

**For further information, contact our Office of Congressional and Public Liaison at (202) 566-2391.**

**To view the full report, click on the following link:**  
[www.epa.gov/oig/reports/2008/20080714-08-P-0200.pdf](http://www.epa.gov/oig/reports/2008/20080714-08-P-0200.pdf)

## **Follow-up Review on Progress at Escambia Treating Company Superfund Site, Pensacola, Florida**

### **What We Found**

EPA Region 4 implemented all but one of our prior report recommendations. For example:

- EPA and the U.S. Army Corps of Engineers monitored the housing inspection process and implemented steps to reduce the likelihood of maintenance issues surfacing when relocating residents.
- Region 4 updated the Community Involvement Plan and provided to the site information repository copies of the plan as well as the community's technical advisor's comments.
- Region 4 conducted public availability sessions with the community.
- Region 4 provided the administrative record compact disks (CDs) to the site repository.

Although Region 4 indicated it had provided electronic files containing the site administrative record to Citizens Against Toxic Exposure (CATE), an environmental group, CATE's current president said the organization did not receive any CDs from the Region. Also, the Region was unable to locate any evidence (e.g., copy of transmittal letter) that it had submitted the CDs to CATE.

The remedial action for contaminated soils at the site began in October 2007 and is expected to be completed around April 2009. EPA completed the draft feasibility study for addressing contaminated groundwater at the site in December 2007. EPA plans to issue the Record of Decision in July or August 2008.

Overall, residents, local governments, and businesses indicated Region 4 openly communicated and provided timely information regarding the site.

### **What We Recommend**

We recommend that EPA Region 4 provide copies of the updated administrative record CDs to CATE. Further, although not warranting formal recommendations, we found several additional steps EPA could take. Steps included updating the administrative record index at the site repository, making CDs more readily available, and providing local officials with fact sheets on a regular basis.

Region 4 concurred with our recommendation and suggestions. The Region indicated it provided the CDs to CATE on May 8, 2008.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
INSPECTOR GENERAL

July 14, 2008

**MEMORANDUM**

**SUBJECT:** Follow-up Review on Progress at Escambia Treating Company  
Superfund Site, Pensacola, Florida  
Report No. 08-P-0200

**FROM:** Eileen McMahon   
Assistant Inspector General  
Office of Congressional and Public Liaison

**TO:** J. I. Palmer, Jr.  
Regional Administrator  
Region 4

This is our final report on the subject review conducted by the Office of Inspector General (OIG) of the U.S. Environmental Protection Agency (EPA). This report contains findings that describe the problems the OIG has identified and corrective actions the OIG recommends. This report represents the opinion of the OIG and the findings contained in this report do not necessarily represent the final EPA position. Final determinations on matters in this report will be made by EPA managers in accordance with established resolution procedures.

The findings in this report are not binding in any enforcement proceeding brought by EPA or the Department of Justice under the Comprehensive Environmental Response, Compensation, and Liability Act to recover costs incurred not inconsistent with the National Contingency Plan.

The estimated cost of this report – calculated by multiplying the project's staff days by the applicable daily full cost billing rates in effect at the time – is \$162,970.

**Action Required**

Based on Region 4's concurrence with the findings, acceptance of the recommendation and suggestions, and completion of the recommended actions, the OIG is closing out this report upon issuance. We have no objections to the further release of this report to the public. This report will be available at <http://www.epa.gov/oig>.

If you or your staff has any questions, please contact me at 202-566-2546, or Eric Lewis at 202-566-2664 or [lewis.eric@epa.gov](mailto:lewis.eric@epa.gov).

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## Purpose

The purpose for conducting this follow-up review was to answer the following questions:

- Did U.S. Environmental Protection Agency (EPA) Region 4 implement the prior Office of Inspector General (OIG) report recommendations?
- What is the current status of the Escambia Treating Company Superfund site clean-up?
- Is EPA communicating effectively with community residents, local businesses, and city and county governments regarding current EPA clean-up plans and actions?

## Background

On September 30, 2004, the OIG issued a report on its review of the Escambia Treating Company Superfund site in Pensacola, Florida (*Review of Actions at Escambia Treating Company Site, Pensacola, Florida*, Report No. 2004-P-00032). The Escambia site is an abandoned wood preserving facility where various health risks were identified and from which about 358 households were permanently relocated.

We had reported that EPA Region 4 took appropriate clean-up planning actions at the Escambia site. The Region had planned to clean up the site to address a contaminated soil mound and contaminated groundwater. However, we could not evaluate the clean-up remedy, since the Agency was still completing feasibility studies at the time of our review. We also reported that the U.S. Army Corps of Engineers effectively implemented a very large and complex residential relocation project at the site. The relocation removed residents from potential health risks and re-situated them in replacement homes away from the site. We also noted that Region 4 made efforts to inform the community and apprise them of activities at the Escambia site. We had made several recommendations to Region 4 for further improvements in clean-up planning, residential relocation, and community relations.

## Scope and Methodology

We performed our field work from September through December 2007. As part of our work, we interviewed EPA employees in Region 4's Superfund Division, an official of the U.S. Army Corps of Engineers, officials of Escambia County and the City of Pensacola, representatives of the Clarinda Triangle Neighborhood Association and Citizens Against Toxic Exposure (CATE) environmental group, and a representative of the local business community. We visited the Escambia Treating Company site and attended the groundbreaking ceremony for the beginning of the site's clean-up on October 30, 2007. We visited the site repository at the West Florida Regional Library in Pensacola, Florida, and reviewed the site administrative records, including clean-up planning and community relations files.

We performed this review in accordance with generally accepted government auditing standards, issued by the Comptroller General of the United States. We limited our review of internal controls during this follow-up review to those specifically relating to the recommendations made in our September 2004 report.

## Results of Review

### **Did EPA Region 4 implement the prior OIG report recommendations?**

With the exception of one recommendation (Recommendation 4.3), Region 4 effectively implemented our September 2004 report recommendations. We specifically found the following regarding each prior recommendation.

***Recommendation 2.1: Include State, local government, and community comments and EPA responses in future Sampling and Analysis Plans.***

- Although we did not locate subsequent Sampling and Analysis Plans during our visit to the site repository, the Florida Department of Environmental Protection Project Manager for the Escambia site noted that Region 4 has been responsive to the State's comments on EPA clean-up planning documents.

***Recommendation 3.1: More closely monitor the housing inspection process and implement the necessary steps to reduce the likelihood of maintenance issues surfacing after relocated residents move into replacement houses.***

- During the relocation of the Clarinda Triangle neighborhood, EPA and the U.S. Army Corps of Engineers monitored the housing inspection process and implemented steps to reduce the likelihood of maintenance issues surfacing. They accomplished this by EPA covering the costs of inspections of replacement homes for owner-occupants. In addition, the U.S. Army Corps of Engineers still conducts "walk-throughs" after inspections to ensure houses are decent, safe, and sanitary.

***Recommendation 3.2: Amend existing relocation policy to allow a period of time during which relocated residents can report maintenance issues on their replacement housing and seek reimbursement from the government for appropriate repair costs.***

- EPA planned to cover the costs of 1-year homeowner's warranty policies for the Clarinda Triangle residents being relocated.

***Recommendation 4.1: Review the existing Community Involvement Plan for the site and revise and/or update the plan every 3 years, at a minimum, as required by the National Contingency Plan. Provide a copy of the updated plan to the site repository for community access.***

- Region 4 updated the Escambia site Community Involvement Plan as of April 2005 and provided a copy to the site repository. The Community Involvement Coordinator indicated that the Region expects to update the plan again during 2008.

**Recommendation 4.2:** Continue to hold public meetings at important phases of site remediation (e.g., major sampling events, demolition). The Region should plan to conduct a public meeting within the next 3 months, since it has been more than a year since the last meeting was held.

- On February 23, 2005, the Region conducted two public availability sessions regarding the Escambia site at the New Hope Missionary Baptist Church in Pensacola, Florida. Region 4 held subsequent availability sessions with the local community, including sessions in September 2005, November 2005, June 2006, August 2007, and September 2007.

**Recommendation 4.3:** Provide a courtesy copy of administrative record documents added to the site repository to the Citizens Against Toxic Exposure (CATE) community group through printed copies, electronic files, or web site access.

- In its January 26, 2005, response to our prior report, Region 4 indicated it had sent an electronic copy of the site administrative record to the CATE community group on January 11, 2005. However, the current president of CATE said that her organization did not receive any electronic files, such as compact disks (CDs), from Region 4. In addition, the Region was unable to locate any evidence (e.g., copy of transmittal letter) that it had submitted the CDs to the CATE organization.

**Recommendation 4.4:** Provide a copy of the CDs containing the site administrative record files, already available in the Region, to the site repository.

- In November 2004, the Region mailed the CDs containing the site administrative record files to the information repository.

**Recommendation 4.5:** Provide a copy of the community's technical assistance grant technical advisor's comments to the site repository as required by EPA regulations.

- Region 4 submitted comments from CATE's technical advisor to the information repository in January 2005.

**Recommendation 4.6:** Submit a response to the City of Pensacola, as promised, on the resolution the City adopted in June 2002 on Escambia clean-up plans and in the future follow through on responses to stakeholders when a promise to respond is made.

- EPA is remediating the site to Florida clean-up standards and the City officials we met with agree with the clean-up plan now. This eliminated the need for Region 4 to respond to the City's initial resolution.

**What is the current status of the Escambia Treating Company Superfund site clean-up?**

The remedial action for contaminated soils at the site (Operable Unit 1) began in October 2007. The remedial action is expected to be completed around April 2009 and will involve:

- permanently relocating the Clarinda Triangle neighborhood residents;
- expanding and lining existing excavations above the water table;
- placing all waste soil below grade and solidifying and stabilizing the principal threat material;
- capping the waste compatible with planned commercial reuse;
- conducting operations and maintenance and monitoring;
- implementing institutional controls to restrict future land use; and
- conducting 5-year reviews.

EPA completed the draft feasibility study for addressing contaminated groundwater (Operable Unit 2) in October 2007 according to the Remedial Project Manager. The Agency expects to issue the Record of Decision in July or August 2008 according to the Remedial Project Manager.

**Is EPA communicating effectively with community residents, local businesses, and city and county governments regarding current EPA clean-up plans and actions?**

Overall, local community members, government, and businesses indicated Region 4 has openly communicated and provided timely information regarding clean-up plans and actions on the Escambia site. As mentioned above, the Region conducted several public availability sessions with the community and also periodically distributed site fact sheets.

**Recommendation**

We recommend that the EPA Regional Administrator, Region 4:

1. Provide copies of the CDs containing the site administrative record for the Escambia Treating Company Superfund site to the CATE environmental organization.

**Agency Response and OIG Comments**

In the response to the OIG draft report, the Regional Administrator indicated that Region 4 provided the CDs containing the administrative record to CATE on May 8, 2008. The OIG concurs with the actions taken by Region 4 to address this recommendation.

## Suggestions

Although they did not warrant formal recommendations, we found several additional steps EPA could take. Those issues and the accompanying suggestions are as follows.

1. It has been 2 years since the site administrative record index at the information repository located at the West Florida Regional Library was last updated (March 7, 2006).

**Suggestion:** Update the administrative record index at the information repository.

**Agency Response and OIG Comments:** Region 4 indicated that another review and update of the administrative record index was scheduled for the week of June 9, 2008. The OIG concurs with the Region's action to address this suggestion.

2. The only fact sheets available at the information repository and cited in the administrative record file index were dated June 1996, December 1997, and August 2005.

**Suggestion:** Provide copies of all fact sheets to the repository that are currently unavailable, and include them in an easily accessible, separate binder.

**Agency Response and OIG Comments:** Region 4 indicated that a copy of all recent fact sheets had been placed in a binder at the information repository. Also, all fact sheets were saved on a CD and sent to the repository on May 7, 2008. The OIG concurs with the actions taken by Region 4 to address this suggestion.

3. There are eight CDs that contain the administrative record at the information repository. However, three of the eight CDs were missing at the library (CDs 1, 7, and 8).

**Suggestion:** Provide additional copies of the three missing CDs (CDs 1, 7, and 8) to the information repository.

**Agency Response and OIG Comments:** Region 4 indicated that on February 13, 2008, it provided a complete set of five CDs containing all public records to date to the information repository. The OIG concurs with the actions taken by Region 4 to address this suggestion.

4. CD 6 of the administrative record CDs available at the information repository contains the site inspection reports, but only includes reports through July 2000.

**Suggestion:** Update CD 6 or provide another CD to the information repository that includes reports of site inspections conducted after July 2000.

**Agency Response and OIG Comments:** Region 4 indicated that on February 13, 2008, it provided a complete set of five CDs containing all public records to date to the information repository. The OIG concurs with the actions taken by the Region to address this suggestion.

5. Most visitors to the West Florida Regional Library would be unaware of the availability of the Escambia site administrative record CDs because there is no sign or notice that the CDs are available at the library.

**Suggestion:** The Region should request that the library place a sign or some other type of notice to indicate the availability of the administrative record CDs through the reference librarian.

**Agency Response and OIG Comments:** Region 4 indicated it had worked with the West Florida Regional Library and that signs were placed in the information repository areas to clearly identify the repository areas and the availability of documents and CDs. The OIG concurs with the actions taken by Region 4 to address this suggestion.

6. The administrative record CDs available at the information repository were not very easy to use. It was difficult to determine how some of the files were organized on the CDs and time-consuming to locate and retrieve specific documents.

**Suggestion:** Make current and future administrative record CDs more user-friendly by including instructions on how to find documents on the CDs.

**Agency Response and OIG Comments:** Region 4 addressed using the CDs in its May 8, 2008, letter to the West Florida Regional Library that accompanied the administrative record CDs. The Region indicated that the CDs will automatically load Adobe Acrobat and users will be able to navigate to specific PDF documents with a web-like interface. The OIG concurs with the actions taken by Region 4 to address this suggestion.

7. Local government and business representatives have several concerns regarding:
  - windfall profits or windfall liens on cleaned up property at the site;
  - assumption of liability at the site and the possibility for liability relief; and
  - lengthy process for clearing and transferring title for property at the site and how this may delay redevelopment plans.

**Suggestion:** Meet with city, county, and local businesses to discuss their concerns and consider solutions.

**Agency Response and OIG Comments:** Region 4 indicated it met with county and city officials many times during the last several years to discuss site redevelopment. Local officials were not completely satisfied with the protections provided through applicable portions of the bona fide prospective purchaser process. They prefer a blanket waiver of liability. The Region indicated it is working to address local officials' concerns within the bona fide prospective purchaser process while also addressing its obligations to Florida through the State Superfund contract. Region 4 noted that potential solutions were discussed and believes the issues will be addressed during the remedial action. The OIG concurs with the actions taken by the Region to address this suggestion.

8. During a meeting with city and county officials in October 2007, several officials said they would like to stay informed of EPA activities at the Escambia site and would appreciate receiving summary information regarding Agency activities and progress at the site. They specifically requested copies of recent site fact sheets, which they would like to distribute to their staff who are involved with the Escambia site.

**Suggestion:** Work with officials of the City of Pensacola and Escambia County to provide them with fact sheets on a regular basis.

**Agency Response and OIG Comments:** Region 4 indicated it had added relevant city and county staff to the mailing list for the site. The Region noted that it informs the city and county when fact sheets are prepared for community meetings through the Technical Assistance Grant recipients – the Clarinda Triangle Association. Region 4 also noted that it established a public Website to present the most recent fact sheets, photographs of site work, and air monitoring data. The OIG concurs with the actions taken by Region 4 to address this suggestion.

## ***Status of Recommendations and Potential Monetary Benefits***

RECOMMENDATIONS					POTENTIAL MONETARY BENEFITS (in \$000s)		
Rec. No.	Page No.	Subject	Status <sup>1</sup>	Action Official	Planned Completion Date	Claimed Amount	Agreed To Amount
1	4	Provide copies of the CDs containing the site administrative record for the Escambia Treating Company Superfund site to the CATE environmental organization.	C	Regional Administrator, Region 4	05/08/08		

<sup>1</sup> O = recommendation is open with agreed-to corrective actions pending  
 C = recommendation is closed with all agreed-to actions completed  
 U = recommendation is undecided with resolution efforts in progress

## ***Agency Response to Draft Report***

June 5, 2008

### **MEMORANDUM**

**SUBJECT:** Region 4 Response to the OIG Draft Public Liaison Report:  
Follow-up Review on Progress at Escambia Treating Company  
Superfund Site, Pensacola, Florida  
Assignment No. OCPL-FY07-0005

**FROM:** J. I. Palmer, Jr.  
Regional Administrator

**TO:** Paul D. McKechnie  
Director of Public Liaison  
Office of Congressional and Public Liaison

The U.S. Environmental Protection Agency, Region 4 (the Region), is providing responses to the one recommendation and eight suggestions identified in the April 30, 2008, draft report from the Office of Inspector General (OIG) entitled, *Follow-up Review on Progress at Escambia Treating Company Superfund Site, Pensacola, Florida*. We have carefully reviewed the draft report and discussed the recommendations and suggestions provided in the report. Based on our review, we believe the report is factually accurate and we generally concur with its recommendations and suggestions. We have prepared the following specific responses:

**Recommendation 1: *Provide a courtesy copy of administrative record documents added to the site repository to the Citizens Against Toxic Exposure (CATE) community group through printed copies, electronic files, or web site access.***

Region 4 Response: On May 8, 2008, the CDs containing the Administrative Record were sent to the Citizens Against Toxic Exposure (CATE), the former Technical Assistance Grantee. Please find this letter included as Attachment A.

#### **Suggestions:**

- 1. It has been 2 years since the site administrative record index at the information repository located at the West Florida Regional library was last updated (March 7, 2006).**

***Suggestion: Update the administrative record index at the information repository.***

Region 4 Response: The administrative record index at the information repository is periodically reviewed and updated to provide new information and replace items that have been lost or stolen. Another review and update is scheduled during the week of June 9, 2008.

- 2. The only fact sheets available at the information repository and cited in the administrative record file index were dated June 1996, December 1997, and August 2005.**

**Suggestion:** *Provide copies of all fact sheets to the repository that are currently unavailable, and include them in an easily accessible, separate binder.*

Region 4 Response: A copy of all recent fact sheets has been placed in a binder at the Information Repository for easy use and access. In addition, all of the fact sheets were saved in Acrobat (.pdf) format on a CD and sent to the West Florida Regional Library on May 7, 2008. Please find this letter included as Attachment B.

- 3. There are eight CDs that contain the administrative record at the information repository. However, three of the eight CDs were missing at the Library (CDs 1, 7, 8)**

**Suggestion:** *Provide additional copies of the 3 missing CDS (CDs 1, 7, and 8)*

Region 4 Response: Region 4 contacted the West Florida Regional Library and received the information regarding the missing CDs. Region 4 found that the CDs contained information from a combination of Escambia and other sites. On February 13, 2008, Region 4 sent a complete set of 5 CDs containing all public records available to date. The West Florida Regional Library responded in a February 22, 2008, letter. Please find these letters included as Attachment C. In addition, please find a photograph included as Attachment D that documents the CDs provided by the librarian to EPA staff on May 20, 2008.

- 4. CD #6 of the administrative record CDs available at the information repository contains the site inspection reports, but only includes reports through July 2008.**

**Suggestion:** *Update CD #6 or provide another CD to the information repository that includes reports of site inspection conducted after July 2000.*

Region 4 Response: Region 4 contacted the West Florida Regional Library and received the information regarding the missing CDs. Region 4 found that the CDs contained information from a combination of Escambia and other sites. Region 4 has addressed this suggestion by sending a complete set of 5 CDs containing all public records available to date. Please refer to Attachment C.

- 5. Most visitors to the West Florida Regional Library would be unaware of the availability of the Escambia site administrative record CDs because there is no sign or notice that the CDs are available at the library.**

***Suggestion: The Region should request that the library place a sign or some other type of notice to indicate the availability of the administrative record CDs through the reference librarian.***

**Region 4 Response:** Region 4 has worked with the West Florida Regional Library and signs now have been placed in the information repository areas to clearly identify the site repository areas and indicate the availability of documents and CDs.

6. **The administrative record CDs available at the information repository were not very easy to use. It was difficult to determine how some of the files were organized on the CDs and time-consuming to locate and retrieve specific documents.**

***Suggestion: Make current and future administrative record CDs more user-friendly by including instruction on how to find documents on the CDs.***

**Region 4 Response:** Region 4 addressed the use of the CDs in the May 8, 2008, letter that accompanied the complete set of the administrative record CDs. The CDs will automatically load Adobe Acrobat and users may navigate to specific PDF documents in a more intuitive web-like interface.

7. **Local government and business representatives have several concerns regarding:**
  - a. **windfall profits or windfall liens on cleaned up property at the site;**
  - b. **assumption of liability at the site and the possibility for liability relief; and**
  - c. **lengthy process for clearing and transferring title for property at the site and how this may delay redevelopment plans.**

***Suggestion: Meet with the city, county, and local businesses to discuss their concerns and consider solutions.***

**Region 4 Response:** Region 4 has met with county and city officials numerous times over the past several years to discuss redevelopment of the site. The referenced issues have been identified, and Region 4 has hosted three separate teleconferences involving environmental attorneys from regional, state, and local governments. Local government officials were not completely satisfied with the protections provided through applicable portions of the bona fide prospective purchaser process, and would prefer a blanket waiver of liability. Region 4 is working to address their concerns within the bona fide prospective purchaser process while also addressing our obligations to the State of Florida through the State Superfund Contract. A range of solutions have been discussed, and the Region is confident these issues will be fully addressed during the Remedial Action.

8. **During a meeting with city and county officials in October 2007, several officials said they would like to stay informed of EPA activities at the Escambia site and would appreciate receiving summary information regarding Agency activities and progress at the site. They specifically requested copies of the recent site fact sheets, which they would like to distribute to their staff who are involved with the Escambia site.**

***Suggestion: Work with officials of the City of Pensacola and Escambia County to provide them with fact sheets on a regular basis.***

**Region 4 Response:** Region 4 has added the city and county staff involved with the activities at the Escambia site to the mailing list for the Site. In addition, the city and county staff are informed when fact sheets are prepared for community meetings through the Technical Assistance Grant recipients, Clarinda Triangle Association. Region 4 has also established a public website, [www.etccleanup.org](http://www.etccleanup.org), which presents the most recent fact sheets, photographs of site work, and air monitoring data. The City of Pensacola has recently had significant turnover in its environmental staff, and Escambia County has been designated as EPA's contact for local government.

In summary, the information contained in this memorandum and in the attached exhibits constitutes the Region's initial response to the OIG report. Suggestions 1, 7, and 8 are ongoing items that are part of the Region's communication strategy with the community and the updated 2005 Community Involvement Plan. As noted during the debriefing from this follow-up review, the Region's renewed efforts towards community involvement over the past several years have produced a tremendous increase in community support for the cleanup of the Escambia Wood Treating Company Superfund Site. EPA Region 4 will continue these efforts throughout the remaining cleanup of this Site.

Thank you for the opportunity to respond to the recommendations and suggestions contained in this report. If you have any questions regarding these responses, please contact Franklin Hill, Director of the Superfund Division, at (404) 562-8583.

#### Attachments

cc: Terry Dempsey, Audit Liaison, Region 4  
Carol Monell, Branch Chief, Superfund Remedial Branch  
David Keefer, Section Chief, Superfund Remedial Branch  
Erik Spalvins, Remedial Project Manager  
L'Tonya Spencer, Community Involvement Coordinator

## ***Distribution***

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