



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590**

June 6, 2023

REPLY TO THE ATTENTION OF:

SE-5J

MEMORANDUM

SUBJECT: Action Memorandum (short version): Request for a Removal Action at the Pigeon Lake Drums Site (SSID # C5XB) located in Liberty, Manitowoc County, Wisconsin 54245.

FROM: Andrew Maguire, On-Scene Coordinator
Emergency Response Section 3

THRU: Samuel Borries, Manager
Emergency Response Branch 2

TO: Douglas Ballotti, Director
Superfund & Emergency Management Division

I. PURPOSE

The purpose of this Action Memorandum is to request and document your approval to expend up to \$48,300 to conduct a time-critical removal action at the Pigeon Lake Drums Site (Site) located in Liberty, Manitowoc County, Wisconsin 54245. The time-critical removal action proposed herein is necessary to mitigate threats to public health, welfare, and the environment posed by the presence of uncontrolled hazardous substances at the Site. There are no nationally significant or precedent-setting issues associated with the proposed response at this non-National Priority List (NPL) Site.

This Action Memorandum serves as approval for expenditures by the U.S. Environmental Protection Agency, as the lead technical agency, to take actions described herein to abate the imminent and substantial endangerment posed by the hazardous substances at the Site. The proposed removal of the hazardous substances will be taken pursuant to Section 104(a)(1) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 42 U.S.C. § 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

Site ID: C5XB

CERCLIS ID: N/A

Category: Time-Critical Removal Action

Site Location: Pigeon Lake, Liberty, Wisconsin 54245

The Pigeon Lake Drums Site consists of three submerged 55-gallon drums, containing unknown, potentially hazardous substances, pollutants, or contaminants in Pigeon Lake, Manitowoc County, Wisconsin. The Site also consists of one 55-gallon drum currently staged off-site that contains a substance with a concentration of lead above the residential direct contact Removal Management Level (RML) of 400 mg/kg that previously released a portion of its contents into Pigeon Lake. Pigeon Lake is a public recreational lake located in Liberty, Manitowoc County, Wisconsin. The lake is surrounded by residential properties and a summer camp property. No known prior environmental investigation has been done at the Site.

On July 23, 2022, Wisconsin Department of Natural Resources (WDNR) was notified of an abandoned 55-gallon drum discharging an unknown substance into Pigeon Lake. WDNR responded and hired a contractor to place boom around the drum and place a marker on it. On August 5, 2022, WDNR hired another contractor to have the drum removed from Pigeon Lake and temporarily staged at the Town of Liberty Garage (13812 English Lake Rd, Valders, WI). A sample was collected to determine contents of the drum and for waste characterization. After the initial drum notification, WDNR was made aware of three more drums submerged in the lake's shallow waters (AR #5). Local residents informed WDNR that they believe there to be many more drums submerged in the lake. The three additional drums appear to be old and in poor condition, the contents are unknown. Where the drums came from or what they contain is unknown (AR #2).

On August 8, 2022, Maizie Reif with WDNR sent a request for EPA removal program assistance with the Site. WDNR indicated that because of the unknown contents of the drums and the potential for more drums to exist under the Lake's surface, they believe the conditions at the Site are beyond the means of the WDNR to assess and remediate and are believed to meet the criteria for a removal response (AR #1).

A. Site Description

1. Removal Site Evaluation

On August 5, 2022, WDNR removed and sampled one of the four drums submerged in the lake. Sample results from the contents of the drum showed the concentration of lead to be 490 mg/kg (AR #3). The contents of the drum exceed the EPA's residential direct contact Removal Management Level (RML) criteria for lead.

On November 10, 2022, EPA along with the Superfund Technical Assessment and Response Team (START) and WDNR mobilized to the Site to investigate the three other known drums submerged in the lake, and to investigate other areas of the lake for more drums. Side Scan

Sonar and an underwater Remotely Operated Vehicle (ROV) were used to help with the investigation. The investigation did not identify any additional drums beyond the three visible submerged drums in shallow water, although the sonar scan did detect several unknown anomalies along the lake bottom.

2. Physical location

The Site consists of three submerged drums in Pigeon Lake, Liberty, Manitowoc County, Wisconsin and one drum staged off-site at Town of Liberty Garage (13812 English Lake Rd, Valders, WI). Pigeon Lake is a recreational lake used for swimming, boating, and fishing. The Lake is not a known source of drinking water. The geographical coordinates to the center of the lake are 43.98709 north and -87.87406 west. The Site is surrounded by residential properties, a summer camp property, and a public boat launch.

An Environmental Justice (EJ) analysis for the Site is contained in Attachment 1. Screening of the surrounding area used Region 5's EJ Screen Tool. Region 5 has reviewed environmental and demographic data for the area surrounding the Site at Pigeon Lake (43.98709, -87.87406) and determined there is a low potential for EJ concerns at this location.

3. Site characteristics

The Site is a year-round recreational lake utilized for swimming, boating, and fishing in the spring/summer/fall and fishing in the winter. Four 55-gallon drums were discovered submerged in the lake, with one discharging an unknown substance that was found to contain lead above EPA's residential direct contact RML. The contents of the remaining three drums are unknown at this time.

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

The removal site evaluation of the Pigeon Lake Drum Site found uncontrolled hazardous substances abandoned or dumped on-site, including lead. One leaking drum was removed from the Site, however, three drums of unknown, potentially hazardous, contents remain submerged in the lake.

Recreational swimmers, boaters, and fishers were potentially exposed to lead during a previously release of contents from one of the drums. The three drums that remain in the lake may contain lead, or another hazardous substance, pollutant, or contaminant, that could release presenting another exposure hazard to people that use the lake for recreation.

Lead is present at the Site exceeding the EPA residential direct contact RML for lead as summarized in the Removal Site Evaluation section, above. Lead is a hazardous substance as defined by Section 101(14) of CERCLA, 42 U.S.C. § 9601(14). *See* 40 C.F.R. § 302.4. Exposure may occur from direct ingestion of material encountered while swimming, boating, or fishing in the Lake.

Lead exposure via inhalation and/or ingestion can have detrimental effects on almost every organ and system in the human body. Lead can cause a variety of health problems to people who are exposed to it. Potential human receptors include residents, including children six years of age and under, and pregnant or nursing women. Children are at greatest risk from the toxic effects of lead. Initially, lead travels in the blood to the soft tissues (heart, liver, kidney, brain, etc.). Then, it gradually redistributes to the bones and teeth where it tends to remain. Children exposed to high levels of lead have exhibited nerve damage, liver damage, colic, anemia, brain damage, and death. The most serious effects associated with markedly elevated blood lead levels include neurotoxic effects such as irreversible brain damage (AR #4).

5. NPL status

The Site is not on the NPL nor is there an expectation that the Site will be proposed for the NPL

6. Maps, pictures and other graphic representations



Location of drums on Pigeon Lake

B. Other Actions to Date

1. Previous actions

On July 23, 2022, WDNR was notified of an abandoned 55-gallon drum discharging an unknown substance into Pigeon Lake. WDNR responded and hired a contractor to place boom around the drum and place a marker on it. On August 5, 2022, WDNR hired another contractor to have the

drum removed from Pigeon Lake and temporarily staged at the Town of Liberty Garage (13812 English Lake Rd, Valders, WI). A sample was collected to determine contents of the drum and for waste characterization. After the initial drum notification, WDNR was made aware of three more drums submerged in the Lake's shallow waters (AR #5). Local residents informed WDNR that many more drums are submerged in the Lake. The three additional drums appear to be old and in poor condition, the contents are unknown. Where the drums came from or what they contain is unknown (AR #2).

On August 8, 2022, Maizie Reif with WDNR sent a request for EPA removal program assistance with the Site. WDNR indicated that because of the unknown contents of the drums and the potential for more drums to exist under the Lake's surface, they believe the conditions at the Site are beyond the means of the WDNR to assess and remediate and are believed to meet the criteria for a removal response (AR #1).

2. Current actions

There are no current actions on Site.

C. State and Local Authorities' Roles

1. State and local actions to date

On July 23, 2022, WDNR was notified of an abandoned 55-gallon drum discharging an unknown substance into Pigeon Lake. WDNR responded and hired a contractor to place boom around the drum and place a marker on it. On August 5, 2022, WDNR hired another contractor to have the drum removed from Pigeon Lake and temporarily staged at the Town of Liberty Garage (13812 English Lake Rd, Valders, WI). A sample was collected to determine contents of the drum and for waste characterization. After the initial drum notification, WDNR was made aware of three more drums submerged in the Lake's shallow waters (AR #5). Local residents informed WDNR that many more drums are submerged in the Lake. The three additional drums appear to be old and in poor condition, the contents are unknown. Where the drums came from or what they contain is unknown (AR #2).

2. Potential for continued State/local response

On August 8, 2022, Maizie Reif with WDNR sent a request for EPA removal program assistance with the Site. WDNR indicated that because of the unknown contents of the drums and the potential for more drums to exist under the Lake's surface, they believe the conditions at the Site are beyond the means of the WDNR to assess and remediate and are believed to meet the criteria for a removal response (AR #1).

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

The conditions remaining 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)(2). 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 [§ 300.415(b)(2)(i)].
- ☒ Actual or potential contamination of drinking water supplies or sensitive ecosystems [§ 300.415(b)(2)(ii)].
- ☒ Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that pose a threat of release [§ 300.415(b)(2)(iii)].
- ☐ High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface that may migrate [§ 300.415(b)(2)(iv)].
- ☒ Weather conditions that may cause hazardous substances or pollutants to migrate or to be released [§ 300.415(b)(2)(v)].
- ☐ Threat of fire or explosion [§ 300.415(b)(2)(vi)].
- ☒ The availability of other appropriate federal or state response mechanisms to respond to the release [§ 300.415(b)(2)(vii)].
- ☐ Other situations or factors that may pose threats to the public health or welfare of the United States or the environment [§ 300.415(b)(2)(viii)].

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, EPA determined that the actual releases and threatened releases of hazardous substances from this Site, if not addressed by implementing the response actions described in this Memorandum, presents an imminent and substantial endangerment to public health or welfare, or the environment

V. ACTIONS AND COSTS

A. Emergency Actions

1. Emergency action description

The response actions to be taken at the Site, and described in this memorandum, directly addresses actual or potential releases of hazardous substances on the Site, releases that pose an imminent and substantial endangerment to public health, or welfare, or the environment. Planned Removal activities on Site include the following:

- 1) Developing and implementing a Site Health and Safety Plan;
- 2) Securing all uncontrolled hazardous substances on-site; and
- 3) Removing, characterizing, and properly disposing of the hazardous substances, pollutants, or contaminants, located at the Site in accordance with EPA's Off-Site Rule (40 C.F.R. § 300.440).
- 4) Take any other response actions to address any release or threatened release of a hazardous substance, pollutant and contaminant that the EPA OSC determines may pose an imminent and substantial endangerment to the public health or the environment.

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. All hazardous substances, pollutants or contaminants removed off-site pursuant to this removal action for treatment, storage, and disposal will be treated, stored or disposed of at a facility in compliance 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.

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

Not Applicable

4. Applicable or relevant and appropriate requirements (ARARs)

Compliance with all applicable, relevant, and appropriate requirements (ARARs) of Federal and State law will be achieved to the extent practicable, considering the exigencies of the circumstances. On June 1, 2023, EPA sent an email request to Maizie Reif of WDNR requesting any State of Wisconsin ARARs that may apply. EPA will consider and implement the submitted ARARs, as appropriate.

Federal

Federal ARARs for this Site primarily include 40 C.F.R. § 300.415(b)(2), 40 C.F.R. Part 260, and 40 C.F.R. § 300.440

5. Project Schedule

This action is expected to take 5 working days to complete.

B. Estimated Costs

REMOVAL ACTION PROJECT CEILING COSTS	
<u>Extramural Costs:</u> <u>Regional Removal Allowance Costs (Includes 5% contingency for trailing costs):</u> Cleanup Contractor Costs	\$ 42,000
<u>Other Extramural Costs Not Funded from the Regional Allowance (Includes 5% contingency for trailing costs):</u> START	\$ 0
Subtotal	\$ 42,000
Contingency costs (15%)	\$ 6,300
Total Removal Project Ceiling	\$ 48,300

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, as well as the actual or threatened release of hazardous substances and pollutants or contaminants from the site, EPA determined that the failure to take action, or a delay in taking action, may present an imminent and substantial endangerment to public health, welfare or the environment, increasing the potential that hazardous substances will be released and thereby threatening the adjacent population and the environment.

VII. OUTSTANDING POLICY ISSUES

None

VIII. ENFORCEMENT

For administrative purposes, information concerning the enforcement strategy for this Site is contained in the Enforcement Confidential Addendum. Based on full-cost accounting practices,

EPA determined that the total EPA costs for this removal action at this time that are eligible for cost recovery are \$86,063.¹

Direct Costs (48,300+ 2000)	+ (Indirect Costs) [(71.10%) x (50,300)]	= Estimated EPA Costs for a Removal Action \$ 86,063
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IX. RECOMMENDATION

This decision document recommends approval of the selected removal action described above for the Pigeon Lake Drum Site located in Liberty, Manitowoc County, Wisconsin. This 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 (Attachment 4). Conditions at the Site meet the NCP Section 300.415(b)(2) 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 \$48,300, of which an estimated \$48,300 may be used for cleanup contractor costs. You may indicate your approval by signing below.

APPROVE:

X

 for

DATE: 06/06/23

Douglas Ballotti, Director
Superfund & Emergency Management Division
Signed by: Environmental Protection Agency

DISAPPROVE:

X

DATE: _____

Douglas Ballotti, Director
Superfund & Emergency Management Division

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.

Enforcement Addendum

- Attachments
1. Administrative Record Index
 2. Region 5 EJ Analysis
 3. Independent Government Cost Estimate
 4. Photo Log

cc: S. Ridenour, U.S. EPA, 5104A/B517F (Ridenour.Steve@epa.gov)
John Nelson, U.S. DOI, w/o Enf. Addendum (John_Nelson@ios.doi.gov)
D. Valencia, U.S. DOI, w/o Enf. Addendum (Darby_Valencia@ios.doi.gov)
M. Reif, WDNR w/o Enf. Addendum (Maizie.Reif@wisconsin.gov)

BCC PAGE HAS BEEN REDACTED

NOT RELEVANT TO SELECTION

OF REMOVAL ACTION

ENFORCEMENT ADDENDUM

HAS BEEN REDACTED

TWO PAGES

ENFORCEMENT CONFIDENTIAL

NOT SUBJECT TO DISCOVERY FOIA

EXEMPT

NOT RELEVANT TO SELECTION

OF REMOVAL ACTION

**U.S. ENVIRONMENTAL PROTECTION AGENCY
REMOVAL ACTION**

**ADMINISTRATIVE RECORD
FOR THE
PIGEON LAKE DRUMS SITE
LIBERTY, MANITOWOC COUNTY, WISCONSIN**

**ORIGINAL
MAY, 2023
SEMS ID:**

<u>NO.</u>	<u>SEMS ID</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
1		8/5/2022	Reif, M., WI DNR	Ribordy, M., U.S. EPA	Site Referral Email	1
2		8/5/2023	Reif, M., WI DNR	Ribordy, M., U.S. EPA	USEPA Removal Request	2
3	_____	8/18/2022_	Eurofins Chicago	North Shore Environmental Constr Inc._ _	Level II Data Report	_ 28
4		8/2007_	ATSDR		Toxicological Profile for lead	582_
5		7/23/2022	WDNR		SERTS File	59_ _ _
6			Maguire, A., U.S. EPA		Action Memorandum Re: (Pending)	

Attachment II

U.S. Environmental Protection Agency Removal Action

Environmental Justice (EJ) Screen for Pigeon Lake Drums Site Liberty, Manitowoc County, Wisconsin

Original- May 2023



EJScreen Report (Version 2.11)



1 mile Ring Centered at 43.987421,-87.873666, WISCONSIN, EPA Region 5

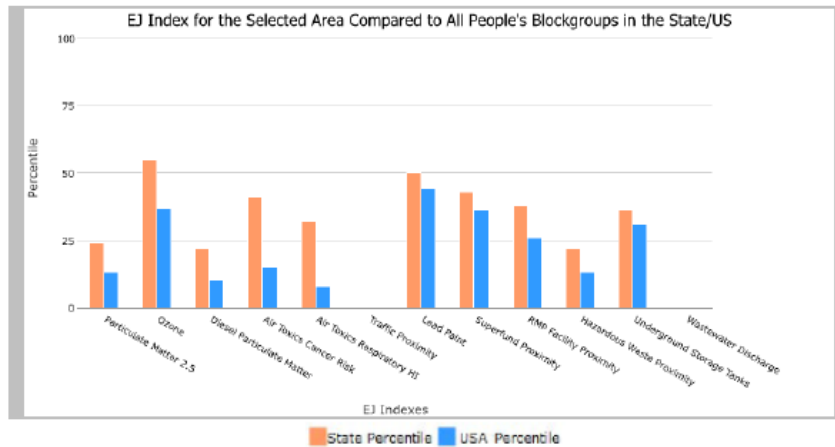
Approximate Population: 236

Input Area (sq. miles): 3.14

Pigeon Lake Drum Site

Selected Variables	State Percentile	USA Percentile
Environmental Justice Indexes		
Particulate Matter 2.5 EJ index	24	13
Ozone EJ index	55	37
Diesel Particulate Matter EJ index*	22	10
Air Toxics Cancer Risk EJ index*	41	15
Air Toxics Respiratory HI EJ index*	32	8
Traffic Proximity EJ index	N/A	N/A
Lead Paint EJ index	50	44
Superfund Proximity EJ index	43	36
RMP Facility Proximity EJ index	38	26
Hazardous Waste Proximity EJ index	22	13
Underground Storage Tanks EJ index	36	31
Wastewater Discharge EJ index	N/A	N/A

EJ Indexes - The EJ indexes help users screen for potential EJ concerns. To do this, the EJ index combines data on low income and people of color populations with a single environmental indicator.



*Diesel particulate matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: <https://www.epa.gov/haps/air-toxics-data-update>.

May 05, 2023

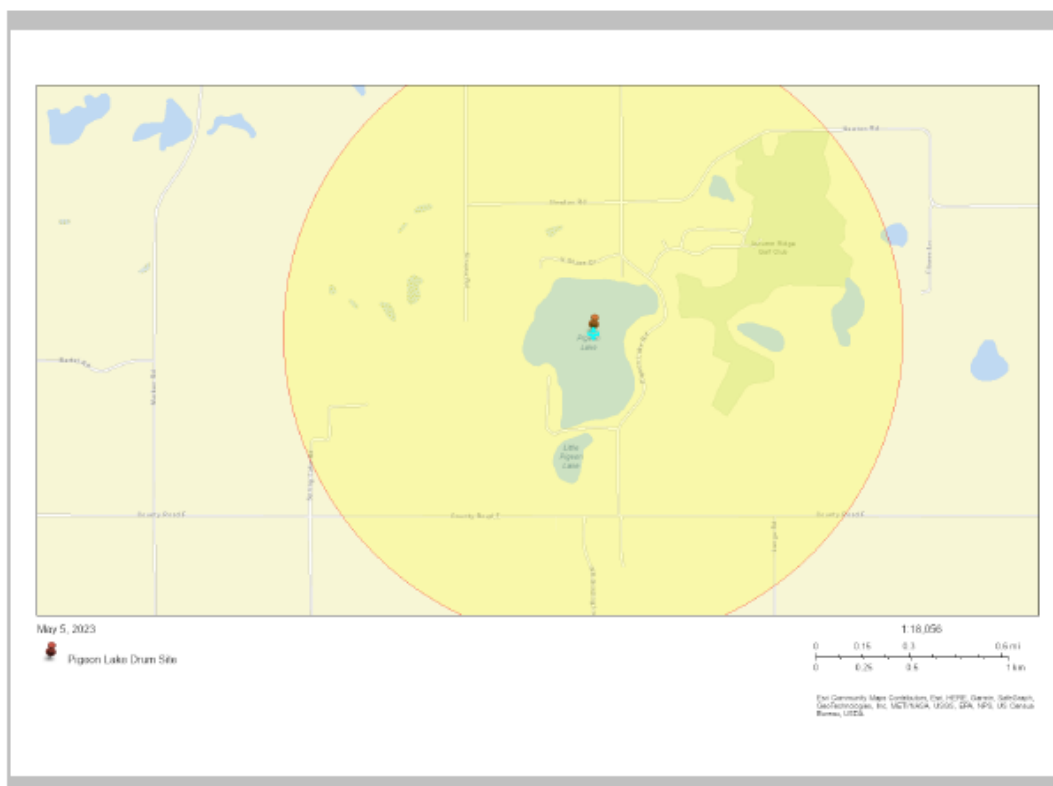
1/4

1 mile Ring Centered at 43.987421,-87.873666, WISCONSIN, EPA Region 5

Approximate Population: 236

Input Area (sq. miles): 3.14

Pigeon Lake Drum Site



Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	0

EJScreen Report (Version 2.11)



1 mile Ring Centered at 43.987421, -87.873666, WISCONSIN, EPA Region 5

Approximate Population: 236

Input Area (sq. miles): 3.14

Pigeon Lake Drum Site

Selected Variables	Value	State Avg.	%ile in State	USA Avg.	%ile in USA
Pollution and Sources					
Particulate Matter 2.5 ($\mu\text{g}/\text{m}^3$)	7.01	7.79	21	8.67	13
Ozone (ppb)	42.1	41.5	53	42.5	48
Diesel Particulate Matter* ($\mu\text{g}/\text{m}^3$)	0.0858	0.188	16	0.294	<50th
Air Toxics Cancer Risk* (lifetime risk per million)	20	20	97	28	<50th
Air Toxics Respiratory HI*	0.2	0.25	55	0.36	<50th
Traffic Proximity (daily traffic count/distance to road)	N/A	620	N/A	760	N/A
Lead Paint (% Pre-1960 Housing)	0.36	0.35	51	0.27	63
Superfund Proximity (site count/km distance)	0.054	0.12	38	0.13	46
RMP Facility Proximity (facility count/km distance)	0.16	0.95	31	0.77	30
Hazardous Waste Proximity (facility count/km distance)	0.068	1.7	15	2.2	13
Underground Storage Tanks (count/km ²)	0.15	3.3	29	3.9	30
Wastewater Discharge (toxicity-weighted concentration/m distance)	N/A	0.41	N/A	12	N/A
Socioeconomic Indicators					
Demographic Index	15%	24%	40	35%	22
Supplemental Demographic Index	10%	12%	44	15%	34
People of Color	4%	19%	20	40%	11
Low Income	27%	27%	55	30%	49
Unemployment Rate	3%	4%	54	5%	42
Limited English Speaking Households	1%	1%	70	5%	57
Less Than High School Education	5%	7%	41	12%	34
Under Age 5	7%	6%	74	6%	70
Over Age 64	22%	17%	72	16%	73
Low Life Expectancy	15%	19%	11	20%	9

EJScreen is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJScreen documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJScreen outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.

1 mile Ring Centered at 43.987421,-87.873666, WISCONSIN, EPA Region 5

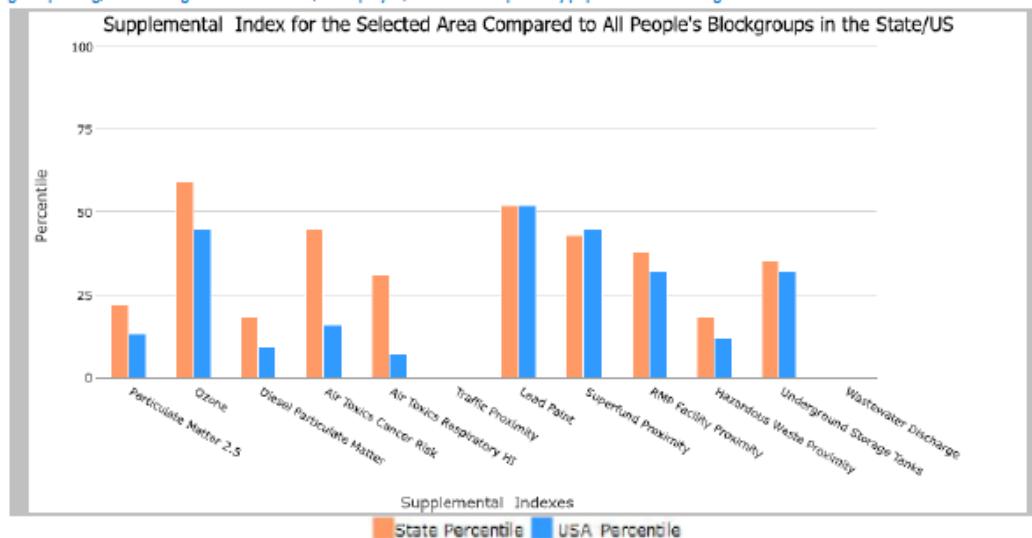
Approximate Population: 236

Input Area (sq. miles): 3.14

Pigeon Lake Drum Site

Selected Variables	State Percentile	USA Percentile
Supplemental Indexes		
Particulate Matter 2.5 Supplemental Index	22	13
Ozone Supplemental Index	59	45
Diesel Particulate Matter Supplemental Index*	18	9
Air Toxics Cancer Risk Supplemental Index*	45	16
Air Toxics Respiratory HI Supplemental Index*	31	7
Traffic Proximity Supplemental Index	N/A	N/A
Lead Paint Supplemental Index	52	52
Superfund Proximity Supplemental Index	43	45
RMP Facility Proximity Supplemental Index	38	32
Hazardous Waste Proximity Supplemental Index	18	12
Underground Storage Tanks Supplemental Index	35	32
Wastewater Discharge Supplemental Index	N/A	N/A

Supplemental Indexes - The supplemental indexes offer a different perspective on community-level vulnerability. They combine data on low-income, limited English speaking, less than high school education, unemployed, and low life expectancy populations with a single environmental indicator.



This report shows the values for environmental and demographic indicators, EIScreen indexes, and supplemental indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EIScreen documentation for discussion of these issues before using reports. For additional information, see: www.epa.gov/environmentaljustice.

ATTACHMENT III

**INDEPENDENT GOVERNMENT COST
ESTIMATE HAS BEEN REDACTED**

ONE PAGE

**NOT RELEVANT TO SELECTION
OF REMOVAL ACTION**

ATTACHMENT IV
PHOTO LOG
FOR
PIGEON LAKE DRUMS SITE
LIBERTY, MANITOWOC COUNTY, WISCONSIN

MAY 2023



Leaking drum containing lead



Submerged 55-gallon drum #1



Submerged 55-gallon drum #2



Submerged 55-gallon drum #3