UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
5 POST OFFICE SQUARE – SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

MEMORANDUM

DATE: April 29, 2025

SUBJ: Request for a Removal Action at the Ballouville Mill Site
Killingly, Windham, Connecticut - **Action Memorandum**

FROM: Lina Takahashi, On-Scene Coordinator
Emergency Response and Removal Section II
LINA TAKAHASHI Digitally signed by LINA TAKAHASHI Date: 2025.04.28 17:28:25 -04'00'

THRU: Edward J. Bazenas, Section Manager
Emergency Response and Removal Section I
EDWARD BAZENAS Digitally signed by EDWARD BAZENAS Date: 2025.04.29 12:09:15 -04'00'

Meghan Cassidy, Acting Manager
Emergency Planning and Response Branch
MEGHAN CASSIDY Digitally signed by MEGHAN CASSIDY Date: 2025.04.29 16:57:05 -04'00'

Meghan Cassidy, Deputy
Superfund and Emergency Management Division
MEGHAN CASSIDY Digitally signed by MEGHAN CASSIDY Date: 2025.04.29 16:57:28 -04'00'

TO: Bryan Olson, Director
Superfund and Emergency Management Division

I. PURPOSE

The purpose of this Action Memorandum is to request and document approval of the proposed removal action at the Ballouville Mill Site (the site), which is located at 244 Ballouville Road in Killingly, Windham County, Connecticut. Hazardous substances present in debris, if not addressed by implementing the response actions selected in this Action Memorandum, will continue to pose a threat to human health and the environment. There are no nationally significant or precedent-setting issues associated with this site, and there has been no use of the On-Scene Coordinator's (OSC's) $200,000 warrant authority.

II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID# : CTN000153821
SITE ID# : 01TH
CATEGORY : Time-Critical

A. Site Description

1. Removal site evaluation

On November 16, 2023, the Attawaugan Fire Department and the Connecticut Department of Energy & Environmental Protection (CT DEEP) responded to a multi-alarm fire at the site, owned by Marjem Recovery, LLC, an inactive company disolved by the State of Massachusetts in 2018. As a safety precaution, immediately after the fire, the town of Killingly demolished the remaining standing structures leaving a pile of debris.

Prior to the fire, the EPA Region 1 Brownfields Program was involved in the site through its Targeted Brownfields Assessment program and had completed a Hazardous Building Materials Survey in June 2023. This survey indicated the presence of lead, mercury, and asbestos, as well as seven transformers for which it was unknown whether their oil contained PCBs.

After the fire, CT DEEP referred a 2.5-acre portion (herein "site") of property to EPA's Removal Program requesting a preliminary assessment/site investigation. EPA performed two rounds of sampling in February 2024 and July 2024. In the first round of sampling, surface debris was sampled for metals, asbestos, and PCBs. In the second round of sampling, an excavator was used to collect samples from within the debris piles, and the samples were analyzed for the same analytes. The site investigation found elevated levels of lead, above EPA's industrial and residential Removal Management Levels Cleanup Standards. Samples were taken from loose debris on and near the surface which could migrate off-site to nearby residential properties and a waterbody. Weather events could further release the exposed hazardous substances in loose building debris. In its referral, CT DEEP indicated it does not have the resources to address the site and nor does the town. Based on the results of the preliminary assessment and site investigation, and the lack of state or local resources, the November 4, 2024 Site Investigation Closure Memorandum concluded that a time critical removal action is warranted.

2. Physical location

The site is located at 244 Ballouville Road in Killingly, Windham County, Connecticut. The town of Killingly Assessor's Office identifies the property on Tax Map 40 as Block 8 and assigns it Property Identification number 2332. The geographical coordinates for the site are:

Latitude: 41.873509
Longitude: -71.862315

3. Site characteristics

The approximately 2.5-acre site is part of what historically was a 17-acre property. A textile mill operated there from 1825 until 1952 when it was used to produce industrial timing devices and small motors. In 1973, it reverted to textile manufacturing until 1988, when it was used for making plastics until 1998. The vacant multi-story building was known to be used by squatters and on November 16, 2023, a multi-alarm fire destroyed it. The town of Killingly demolished any remaining structures. A chain link fence surrounds the footprint of the former mill building to prevent trespassing.

To the south, east, and west of the site there are residences and commercial buildings immediately adjacent to the debris pile. There is a large, wooded area to the northeast. The nearest surface water body, the Five Mile River, runs along the western border, and a man-made canal extends from Ballouville Pond to the south, running underneath the former mill. The site can be accessed from both Ballouville Road and Chestnut Hill Road.

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

A total of 44 bulk asbestos samples and 35 debris samples from multiple locations across the site were collected during EPA's 2024 site investigation. EPA sampled for metals, asbestos and polychlorinated biphenyls (PCBs), the analytes were informed by the Targeted Brownfields Assessment Hazardous Building Materials Survey (June 2023), which indicated the presence of asbestos, lead, and mercury in the building, prior to the November 2023 fire. The survey also indicated the presences of electrical transformers on site but could not determine whether they contained PCBs, because of the lack of certainty PCBs were included the sampling. All samples were taken from the debris inside the building footprint, samples were not taken from the soil around or underneath the building. Sampling analysis by EPA determined that one of the bulk asbestos samples contained 1% chrysotile asbestos (see Table 1 below). Sampling analysis also determined that lead and mercury, both hazardous substances as defined by Section 101(14) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. §9601(14), and 40 CFR §302.4, have been released or threatened to be released into the environment at the site (see Table 2 below). All results from sampling can be seen in the August 2024 Removal Program Preliminary Assessment and Site Investigation Report for the Ballouville Mill Site. EPA Removal Management Levels (RMLs, 2024) for residential areas are provided for comparison:

Table 1 – Asbestos

Sample ID	Analysis	Compound	Matrix	Concentration
SS-24	Bulk Asbestos Analysis by Polarized Light Microscopy	Chrysotile	Bulk	1%

Table 2 – Lead and Mercury

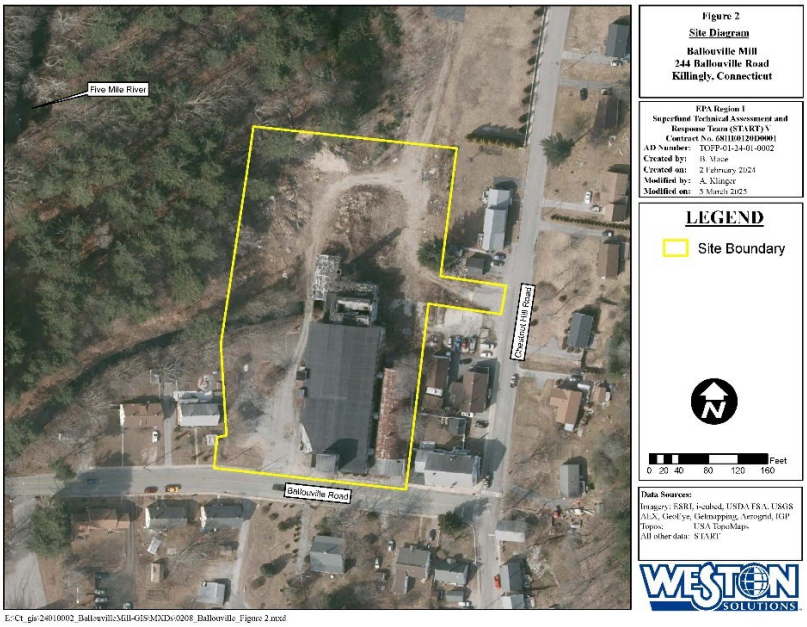
	Lead in Soil (mg/kg)	Mercury in Soil (mg/kg)
EPA RML, 2024 – Residential	200	33
EPA RML, 2024 – Industrial	800	140
Range in site soil/debris concentrations	ND – 11,000	ND – 87

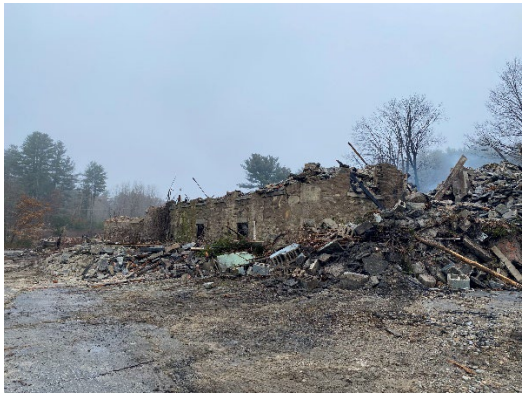
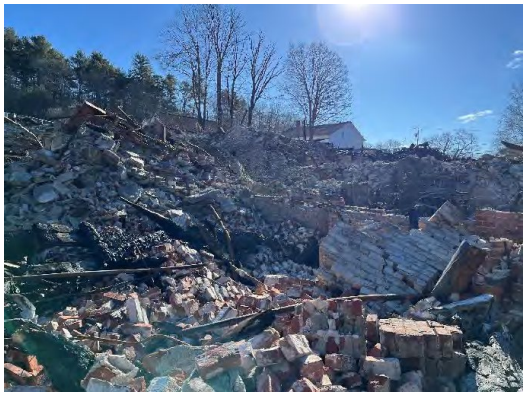
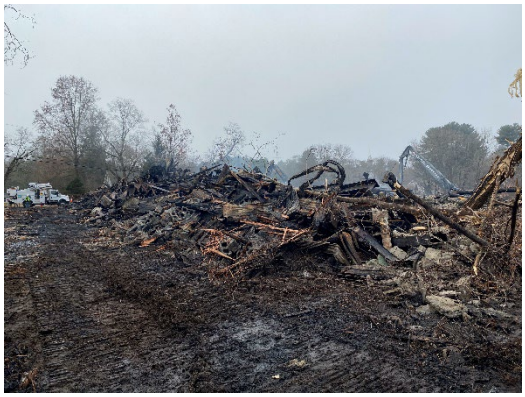
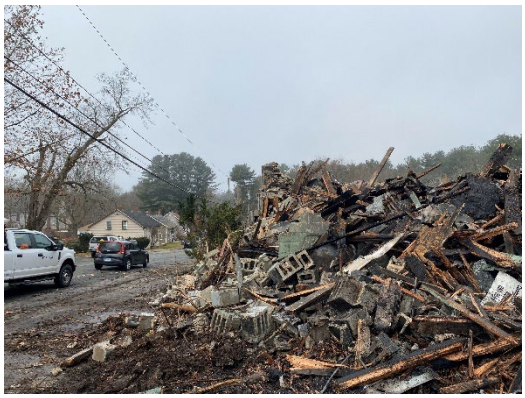
Notes: Regarding lead: 16 out 35 samples were above the EPA RML – residential. 7 samples were above the EPA RML – industrial.
Regarding mercury: one out of 35 samples was above the EPA RML – residential.

5. NPL status

The site is not currently on the National Priorities List and has not received a Hazardous Ranking System rating.

6. Maps, pictures and other graphic representations



 From southwest corner of site.	 View of the debris pile from northwest corner of site.
 View of mixed debris – edge of site where Quonset hut used to be.	 View of mixed debris next to Ballouville Road – fencing is in place between debris and the road now.

B. Other Actions to Date

1. Previous actions

In August 1995, an Environmental Site Investigation was performed on behalf of the owner at the time DSM Engineering Plastic Products, Inc. by a private contractor, on the historical mill property excluding the portion that constitutes the 2.5-acre site that is the focus for this removal action. The investigation included a historical solid waste landfill, a small, unregistered gasoline underground storage tank, and the canal tailrace.

Additional efforts focusing on the historical mill property, excluding the site boundary subject to this removal action, include the following work in 1997. In 1997, a Site Characterization Report, performed by a private contractor on behalf of DSM Engineering Plastic Products, delineated the extent of industrial fill. Also in 1997, a Remedial Action Plan outlined the strategy to address the contamination identified in the 1995 and 1997 reports. The work was conducted voluntarily under the guidance of Connecticut Department of Environmental Protection, now the Connecticut Department of Energy and Environmental Protection (CT DEEP). The Final Remedial Closure Report was completed in the same year and documented remediation activities that occurred between August and October 1997, which included excavation of industrial fill and scattered surface debris and total petroleum hydrocarbons (TPH) and polynuclear aromatic hydrocarbons contaminated soils (PAH). The TPH contaminated soil was removed from the vicinity of the property.

In November 2020, a Phase I Environmental Site Assessment was completed by a private contractor on behalf of the town of Killingly. The assessment identified 14 areas of concern in the full 17-acre historical mill property. Areas of Concern 4 – 13 are within the 2.5 acre-site boundary subject to this removal action.

In June 2023, a Targeted Brownfields Assessment was commissioned by the EPA Brownfields Program on behalf of the town of Killingly. The study assessed soil, debris, concrete, surface water, and groundwater conditions on the site. As part of the assessment, a Hazardous Building Materials Survey was completed in May 2023. The survey included the identification, quantification, and locations of accessible asbestos containing material, lead, PCBs, and regulated/universal wastes.

2. Current actions

The EPA removal program's preliminary assessment and site investigation has been completed and there are no other ongoing EPA activities.

C. State and Local Authorities' Roles

1. State and local actions to date

On November 16, 2023, in the early morning, the Attawaugan Fire Department and Killingly Fire Marshall were the first to respond to the multi-alarm fire which engulfed the mill. CT DEEP was on site during the fire and performed perimeter air monitoring. The Killingly Town Manager notified the EPA Brownfields Program of the fire, due to its ongoing Targeted Brownfields Assessment work. As a result of the fire, CT DEEP subsequently referred the site to the EPA Emergency Planning and Response Branch. CT DEEP requested that EPA assess the site as a potential emergency response; an OSC went to the site November 17, after the demolition, and determined that it did not warrant an emergency response.

On November 28, 2023, CT DEEP requested EPA perform a preliminary assessment and site investigation at the Site.

2. Potential for continued State/local response

CT DEEP and the town lack the resources to undertake the removal action proposed in this action memorandum.

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

Site conditions meet the general criteria[1] for a removal action, as set forth in 40 C.F.R. §300.415(b)(1) in that "There is a threat to public health or welfare of the United States or the environment," and in consideration of the factors set forth in 40 C.F.R. §300.415(b)(2) as described below. Lead, mercury and asbestos are hazardous substances as defined by Section 101(14) of CERCLA, 42 U.S.C. §9601(14) and 40 C.F.R. § 302.4.

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)];

As stated previously, lead, mercury, and asbestos have been detected in the debris pile, which is uncovered and exposed, from the former mill building. During the preliminary assessment and site investigation, 45% of the metal samples had detections above the Lead, Residential Removal Management Level. Weather conditions may cause a release into the environment or migrate offsite to adjacent properties, creating an inhalation threat to the surrounding community. Potential health effects are found in the Agency for Toxic Substances and Disease Registry's Toxicological Profiles or ToxFAQs.

Lead

[1] *CERCLA section 104(a) authorizes removal responses "whenever (A) any hazardous substance is released or there is a substantial threat of such a release into the environment, or (B) there is a release or substantial threat of release into the environment of any pollutant or contaminant which may present an imminent and substantial danger to the public health or welfare." Note that EPA's response authority is limited under section 104(a)(3) of CERCLA when there is a release or threat of release: of a naturally occurring substance in its unaltered form, or altered solely through naturally occurring processes or phenomena, from a location where it is naturally found; from products which are part of the structure of, and result in exposure within, residential buildings or business or community structures; or into public or private drinking water supplies due to deterioration of the system through ordinary use. EPA may not respond to these situations unless a public health or environmental emergency exists and no other authority can respond in a timely manner.*

The effects of lead are the same whether it enters the body through inhalation or ingestion. 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.

The Department of Health and Human Services has determined that lead and lead compounds are reasonably anticipated to be human carcinogens, and EPA has determined that lead is probably a human carcinogen. The International Agency for Research and Cancer has determined that inorganic lead is probably carcinogenic to humans and that there is insufficient information to determine whether organic lead compounds will cause cancer in humans.[2]

Mercury

All forms of mercury can affect the nervous system and kidneys. The main routes of exposure are through inhalation of vapors and ingestion. Symptoms of exposure include tremors, incoordination, impaired vision, impaired learning and memory, mood changes, high blood pressure, and alterations to the immune system. Exposure to high levels of mercury may also cause birth defects. In animals, inhalation of elemental mercury vapors or ingestion of organic or inorganic mercury compounds showed nervous system effects and/or kidney damage. Animals that ingested high levels of mercury compounds showed decreased fertility and/or birth defects.[3]

Asbestos

Exposure to asbestos occurs when asbestos-containing material is disturbed or damaged in some way to release particles and fibers into the air. Asbestos exposure can cause lung cancer; mesothelioma, a rare form of cancer that is found in the thin lining of the lung, chest and the abdomen and heart; and asbestosis, a serious progressive, long-term, non-cancer disease of the lungs.[4]

[2] Agency for Toxic Substances and Disease Registry (ATSDR), U.S. Department of Health and Human Services, Public Health Service, *Toxicological Profile for Lead*, August 2020.
[3] Agency for Toxic Substances and Disease Registry (ATSDR), U.S. Department of Health and Human Services, Public Health Service, *Toxicological Profile for Mercury*, October 2024.
[4] Agency for Toxic Substances and Disease Registry (ATSDR), U.S. Department of Health and Human Services, Public Health Service, *Toxicological Profile for Asbestos*, September 2001.

Actual or potential contamination of drinking water supplies or sensitive ecosystems [§300.415(b)(2)(ii)];

A man-made canal runs beneath the Site and run into Five-Mile River. Runoff from the contaminated site could impact these surface waters.

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)];

The preliminary assessment and site investigation characterized the site thoroughly and found the presence of hazardous substances, specifically lead and mercury, contaminating the debris of the former mill building. EPA sampling found concentrations of lead as high as 11,000 mg/kg, exceeding EPA's Residential and Industrial Removal Management Levels. EPA sampling also found concentrations of mercury as high as 87mg/kg, exceeding EPA's Residential Removal Management Level. (Refer to Table 2)

Asbestos-containing material was identified in the mill building prior to the fire and its presence was confirmed during the preliminary assessment and site investigation. The asbestos-containing material is exposed to the elements and during high winds will likely migrate from the Site and onto nearby residential and commercial properties.

The footprint of the demolished building is secured with fencing, however, that does not prevent the release of hazardous substances or asbestos-containing material off-site.

Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released [§300.415(b)(2)(v)];

There is lead, mercury, and asbestos-containing material in surface debris, and the potential for migration is high. During times of heavy precipitation or snow-melt runoff, surface water may carry debris containing asbestos fibers, lead, and mercury. Under dry conditions, contaminated dust and asbestos fibers may be blown from the site and spread to nearby residential properties. During windy conditions, there is also a higher chance of inhalation of these particles and fibers.

The availability of other appropriate Federal or State response mechanisms to respond to the release [§300.415(b)(2)(vii)];

CT DEEP has indicated that it currently does not possess the resources to address this potential imminent hazard.

IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances or pollutants or contaminants from this site, if not addressed by implementing the response action selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, welfare, or the environment. In accordance with OSWER Directive 9360.0-34 (August 19, 1993), an endangerment determination is made based on "appropriate Superfund policy or guidance, or on collaboration with a trained risk assessor," which is outlined and discussed in Section III above. "Appropriate sources include, but are not limited to, relevant action level or clean-up standards, Agency for Toxic Substances and Disease Registry documents or personnel, or staff toxicologists." In this case, EPA relied on EPA's National Emissions Standards for Hazardous Air Pollutants (NESHAP)[5] and EPA's published Removal Management Levels, for determining risk at the site.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed action description

The action required to mitigate the threats outlined herein is given below. The proposed action will protect public health, welfare, and the environment by removing the hazardous substances from accessible areas of the site. As outlined below, the proposed action will involve the removal of asbestos and other hazardous wastes in debris.

Regarding the level of certainty related to the extent of contamination at the site, there is lead contamination throughout, however there is a high level of uncertainty regarding the asbestos contamination. The Hazardous Building Materials Survey preformed before the fire and demolition found asbestos in various materials throughout the building, however the 2024 site investigation found one sample of 1% chrysotile asbestos out of 44 total samples. This unknown could result in increased disposal costs.

Specific removal activities will include, but are not necessarily limited to the following:

- Conducting a site walk;
- Developing and implementing a site-specific safety plan;
- Mobilizing necessary resources (equipment and personnel) required to support activities described in this section, including securing work trailer(s), and sanitary facilities;

[5] U.S. Environmental Protection Agency. https://www.epa.gov/asbestos/overview-asbestos-national-emission-standards-hazardous-air-pollutants-neshap

- Installing security fencing;
- Clearing vegetation and debris, as needed;
- Conducting additional sampling and site characterization to further delineate extent of contamination and/or assist in supporting response and disposal actions;
- Performing public communication and outreach activities;
- Inventorying and documenting existing property conditions prior to commencing excavation activities;
- Clearing vegetation or debris as needed to provide proper clearance and space for removal activities;
- Removing any debris contaminated with hazardous materials;
- Removing any ACM and ACM contaminated debris form the site;
- Performing debris sampling during excavation to determine extent of contamination, as necessary;
- Segregating contaminated debris from non-contaminated debris, as appropriate;
- Excavating surficial soil contaminated with lead, mercury or asbestos at concentrations of concern, as necessary;
- Backfilling areas of excavation with clean fill, as necessary;
- Conducting dust-control and air monitoring activities, as necessary to prevent off-site migration of dust during removal action;
- Establishing a temporary staging area for debris awaiting disposal;
- Disposing of hazardous substances at EPA-approved off-site disposal facilities;
- Recycling material, as possible;
- Repairing or replacing response related damages;
- Notifying EPA Brownfields Program of the completion of the removal for continued coordination with the town of Killingly; and
- Referring the site to CT DEEP for any long-term measures that may be required to address remaining risks, including post-removal site controls.

2. Community relations

EPA will remain involved with the local community during the removal action through press releases, fact sheets, and public meetings, as necessary. The OSC will receive assistance from a EPA Community Involvement Coordinator to assist with all public relations activities. EPA will work closely with the community, state, town, and local businesses.

3. Contribution to remedial performance

The cleanup proposed in this Action Memorandum is designed to mitigate the threats to human health and the environment posed by the Site. The actions taken would be consistent with and will not impede any future responses.

4. Applicable or relevant and appropriate requirements (ARARs)

Pursuant to 40 C.F.R. 300.415(j), removal actions shall, to the extent practicable, considering the exigencies of the situation, attain ARARs. EPA has been working in coordination with CT DEEP to determine the applicable state ARARs for the site. Current ARARs identified, but not limited to, are listed below:

Federal ARARs:

Clean Water Act, National Pollutant Discharge Elimination System (NPDES), 40 C.F.R. Parts 122 – 125; 122.26: Establishes the specifications for discharging pollutants from any point source into the waters of the U.S. Also, includes storm water standards for construction sites over one acre. Removal activities will be managed to prevent stormwater discharge from the site. To the extent water generated from the removal action needs to be discharged to the river, applicable discharge standards will be met.

Clean Water Act, 40 C.F.R. Sections 122.26(c)(ii)(C) and 122.44(k): NPDES regulations for storm water control and management.

Clean Water Act Federal Water Quality Criteria, Section 304(a), 40 C.F.R. 131.11: National Recommended Water Quality Criteria for chemicals for both the protection of human health and the protection of aquatic life; to be used as water quality monitoring standards for any work in or adjacent to wetlands or water bodies. If the removal action's work is adjacent to any aquatic life these standards will be met.

Clean Air Act, 40 C.F.R. Part 61, 42 U.S.C. Section 112(b)(1): standards for controlling dust. The regulations establish emissions standards for 187 hazardous air pollutants. Standards set for dust and release sources. If the removal of contaminated soils generates regulated air pollutants, then measures will be implemented to meet these standards.

Clean Air Act, National Emission Standards for Hazardous Air Pollutants (NESHAPS: 40 C.F.R. § 61.151): Standards for inactive waste disposal sites that apply to asbestos mills and manufacturing and fabricating. NESHAPS standards for preventing air releases from inactive asbestos disposal sites, including cover standards, dust suppression, and land use controls. Asbestos contaminated materials will be consolidated and shipped off-site for disposal at EPA-approved facility.

Toxic Substances Control Act (Transport and Disposal of Asbestos Waste), 40 C.F.R. Subpart E, Appendix D: Provides standards for transport and disposal of materials that contain asbestos. Requires proper wetting and containerization. Asbestos will be managed in compliance with these standards.

To be Considered: Framework for Investigating Asbestos-Contaminated Superfund Sites, OSWER Directive #9200.0-68 (Sept. 2008): Guidance on investigating and characterizing the potential human exposure from asbestos contamination in outdoor soil at Superfund sites.

State ARARs:

Resource Conservation and Recovery Act, Subtitle C 40 C.F.R. Parts 260-262 and 264: Hazardous Waste Identification and Listing Regulations; Generator and Handler Requirements, Closure and Post-Closure. Connecticut has been delegated the authority to administer these RCRA standards through its state Hazardous Waste Management regulations (RCSA 22a-449(c) 100-101). Waste generated will be tested to determine whether it exceeds hazardous waste thresholds and, if so, the hazardous waste will be managed on-site and until such time as it is shipped to an EPA-approved off-site disposal location.

Disposition of PCBs Regulation (CGS 22a-354 through 354bb): this regulation establishes prohibitions of, and requirements for the disposal, storage, and marking of PCBs and PCB waste. The standard requires the handling of PCB waste to be consistent with the Toxic Substance Control Act (TSCA), 40, CFR 761. If sampling data of PCBs trigger these requirements, then PCBs will be managed in accordance with these requirements.

The OSC will coordinate with state officials to identify additional state ARARs, if any. In accordance with the National Contingency Plan and EPA Guidance Documents, the OSC will determine the applicability and practicability of complying with each ARAR that is identified in a timely manner.

6. Project schedule

The duration of the removal action will be approximately 4 months from the day EPA mobilizes its contractor.

B. Estimated Costs

COST CATEGORY		CEILING
REGIONAL REMOVAL ALLOWANCE COSTS:		
ERRS Contractor		$1,000,000.00
Interagency Agreement		$ 0.00
OTHER EXTRAMURAL COSTS NOT FUNDED FROM THE REGIONAL ALLOWANCE:		
START Contractor		$300,000.00
Extramural Subtotal		$1,300,000.00
Extramural Contingency	15%	$195,000.00
TOTAL, REMOVAL ACTION CEILING		**$1,495,000.00**

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

Delayed action or the absence of a removal action described herein will leave the threats associated with the presence of hazardous substances and asbestos-containing material.

VII. OUTSTANDING POLICY ISSUES

There are no precedent-setting policy issues associated with this site.

VIII. ENFORCEMENT ... For Internal Distribution Only

See attached Confidential Enforcement Strategy.

The total EPA costs for this removal action that will be eligible for cost recovery are estimated to be $1,495,000.00 (extramural costs) + $200,000 (EPA intramural costs) = $1,695,000.00 X 1.3393 (regional indirect rate) = **$2,270,113.50** [6].

[6]Direct Costs include direct extramural costs $1,495,000.00 and direct intramural costs $200,000.00. Indirect costs are calculated by using regional indirect rate in effect at time cost estimate is prepared and is expressed as a percentage of the 33.93% (effective January 6, 2025) x $2,270.113.50, consistent with EPA's full cost accounting methodology. 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 Ballouville Mill Site in Killingly, CT developed in accordance with CERCLA, as amended, and is not inconsistent with the National Contingency Plan. The basis for this decision will be documented in the administrative record to be established for the site.

Conditions at the site meet the National Contingency Plan Section 300.415 (b) (2) criteria for a removal action due 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)];

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 or contaminants to migrate or be released [§300.415(b)(2)(v)]

The availability of other appropriate Federal or State response mechanisms to respond to the release [§300.415(b)(2)(vii)]; and

Other situations or factors that may pose threats to public health or welfare of the United States or the environment [§300.415(b)(2)(viii)].

I recommend that you approve the proposed removal action. The total extramural removal action project ceiling if approved will be $2,495,000.00.

APPROVAL: BRYAN OLSON Digitally signed by BRYAN OLSON Date: 2025.04.30 11:29:30 -04'00' DATE:_____