

**EPA Superfund  
Record of Decision:**

**AUSTIN AVENUE RADIATION SITE  
EPA ID: PAD987341716  
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DELAWARE COUNTY, PA  
06/27/1994**

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PB94-963918  
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EPA Superfund  
Record of Decision:

Austin Avenue Radiation Site, PA,  
6/27/1994

RECORD OF DECISION  
AUSTIN AVENUE RADIATION SITE

DECLARATION

SITE NAME AND LOCATION

Austin Avenue Radiation Site  
Delaware County, Pennsylvania

STATEMENT OF BASIS AND PURPOSE

This Record of Decision (ROD) presents the selected remedial actions for twenty-two (22) properties included in the Austin Avenue Radiation Site, Delaware County, Pennsylvania (Site). The remedial actions were developed in accordance with the statutory requirements of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended (CERCLA), 42 U.S.C. [Para][Para] 9601 et. seq., and are consistent with the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 C.F.R. Part 300. These remedy selection decisions are based on an Administrative Record compiled for this Site (an index to this Administrative Record is attached). The Commonwealth of Pennsylvania concurs with these remedial actions. A copy of the concurrence letter is attached.

ASSESSMENT OF THE SITE

Actual or threatened releases of hazardous substances from properties covered by this ROD, if not addressed by implementing the response actions selected in this ROD, may present an imminent and substantial endangerment to public health, welfare, or the environment.

DESCRIPTION OF THE SELECTED REMEDY

The selected remedial actions identified in this ROD will mitigate and/or prevent human exposure to radiation-contaminated buildings and soil. These actions will affect twenty-two (22) properties, twenty-one of which are contaminated with radioactive hazardous substances.

The selected remedial actions include the following major components:

1. The removal of contaminated components from the residential structure located at 346 Owen Avenue and the repair of the structure.
2. The removal of contaminated structural components where practicable, or the complete dismantlement of residential structures on eighteen other properties followed by either repair of the structures, replacement of the structures on those properties, or relocation of the residents to an offsite location. The property owners will select repair (where practicable), structure replacement, or offsite relocation after this ROD is issued. The United States will acquire title to each property where offsite relocation has been selected by the residents. At the end of the remedial action, title to each such property will be transferred to the Commonwealth of Pennsylvania.
3. The dismantlement of an additional at the rear of 42 South Union Avenue and the repair of that building and the adjacent structure at 44 South Union Avenue, as necessary.
4. Temporary relocation of property residents during contamination removal and structural restoration or replacement. Building

tenants will be relocated.

5. Removal and offsite disposal of radiation-contaminated soils at permitted facilities.
6. Offsite disposal of radioactive and demolition wastes at permitted facilities.
7. Backfilling and revegetation of remediated properties.
8. Replacement of the storage building that at one time was 135 Austin Avenue.
9. Provision of an offsite structure or equivalent to replace the building formerly located at 133 Austin Avenue.
10. Provision of institutional controls in those instances where soils cannot be removed to a level where the property is available for unrestricted use and unlimited access.

#### STATUTORY DETERMINATIONS

The selected remedies are protective of human health and the environment, comply with Federal and State requirements that are legally applicable or relevant and appropriate to the remedial actions, and are cost-effective. These remedies utilize permanent solutions and alternative treatment technologies to the maximum extent practicable. However, because treatment of the principal threats at these properties was not found to be practicable, these remedies do not satisfy the statutory preference for treatment as a principal element.

For each property where hazardous substances remain onsite above health-based levels, the five-year review required by Section 121(c) of CERCLA, 42 U.S.C. [Para] 121(c), will apply.

Peter H. Kostmayer  
Regional Administrator, Region III

6-27-94  
Date

REMEDIAL ALTERNATIVE RECORD OF DECISION SUMMARY  
AUSTIN AVENUE RADIATION SITE

1. SITE LOCATION AND DESCRIPTION

The Austin Avenue Radiation Site ("Site") is located on and near approximately forty parcels in Lansdowne Borough, Aldan Borough, East Lansdowne Borough, Darby Borough and Upper Darby Township, Delaware County, Pennsylvania. These parcels, all within a two-mile radius of the former W.L. Cummings radium refining operation ("Cummings") which was located at the intersection of South Union Avenue and Austin Avenue in Lansdowne (see Figure 1), have been contaminated with radium and thorium-contaminated waste tailings from the defunct refining operation which were used in building construction and renovation during the early 1900s. Twenty-two (22) of the parcels that have been placed on the National Priorities List (NPL) promulgated pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended (CERCLA), and the National Oil and Hazardous Substances Pollution Contingency Plan, 40 C.F.R. Part 300, are subject to this Record of Decision. The remaining parcels are or will be addressed exclusively by removal actions performed pursuant to section 104 of CERCLA, 42 U.S.C. [Para] 9604.

The parcels included within the Austin Avenue Radiation Site which are subject to this Record of Decision are as follows:

Lansdowne Borough

- (1) 216 Wayne Avenue
  - (2) 218 Wayne Avenue
  - (3) 219 Wayne Avenue
  - (4) 237 North Lansdowne Avenue
  - (5) 6 East Plumstead Avenue
  - (6) 10 East Plumstead Avenue
  - (7) 16 East Plumstead Avenue
  - (8) 42 South Union Avenue
  - (9) 133 Austin Avenue
- (10) Site of the former radium refining facility at S. Union Ave. and Austin Avenue

Upper Darby Township

- (11) 500 Harper Avenue
- (12) 346 Owen Avenue
- (13) 310 Shadeland Avenue
- (14) 3723 Huey Avenue

Aldan Borough

- (15) 64 South Clifton Avenue

East Lansdowne Borough

- (16) 34 Lewis Avenue
- (17) 211 Penn Boulevard
- (18) 151 Lexington Avenue

Darby Borough

- (19) 617 Pine Street
- (20) 619 Pine Street
- (21) 621 Pine Street
- (22) 623 Pine Street

2. SITE HISTORY

The history of the Austin Avenue Radiation Site is intertwined with that of a former Superfund site, the Lansdowne Radiation Site, which was a twin house located at 105-107 East Stratford Avenue in Lansdowne, Pennsylvania. A now deceased professor, Dr. Dicran Hadjy Kabakjian, owned the house at 105 East Stratford Avenue, and also worked for Cummings while the company conducted its radium refining operation at the warehouse.

While a professor at the University of Pennsylvania, Dr. Kabakjian developed a crystallization process for the refining of radium, and then sold the process to Cummings. He worked as a consultant to Cummings until 1924, when he set up his own radium processing business in the basement of his home at 105 East Stratford Avenue. The major product of his home business was radium-filled implant needles which were sold to medical professionals for the treatment of cancer.

The radium refining process developed by Dr. Kabakjian and practiced at Cummings' warehouse used a yellowish, shale-like material known as carnotite ore. This ore was mined from deposits in Utah and Colorado. One ton of carnotite ore could produce approximately one-tenth of a grain of radium. During Cummings' years of operation at the Union Avenue warehouse, its radium output is estimated to have been three grams per year. The radium extraction process generated waste tailings. These tailings contained two residual radionuclides, radium 226 and thorium 230. The tailings, which were sand-like waste materials, were either given or sold to local building contractors and others. During the seven years that Cummings operated at the warehouse, those persons used the tailings in mortar, stucco, plaster, and concrete which were used to build or renovate houses in the area. The ore processing also produced waste liquids containing uranium 238. These liquids were apparently dumped into cesspool systems in the immediate vicinity of the Cummings facility.

In 1963, the Pennsylvania Department of Health inspected the 105 East Stratford Avenue house and found extremely high levels of radiation. In 1964, the U.S. Public Health Service and the Pennsylvania Department of Health, aided by the U.S. Air Force, attempted to decontaminate the house. In 1984, EPA and Pennsylvania Department of Environmental Resources (PADER) sampling and monitoring of the structure showed high residual radiation contamination levels. An extensive evaluation of the house was conducted by the U.S. Department of Energy's Argonne National Laboratory. In 1986, EPA issued a Record of Decision (ROD) which called for the dismantlement and offsite disposal of the house and contaminated soils. It was at this time that the location of other tailings from the operation became an issue as the government suspected that the tailings would contain residual radiation contamination. No records relating to the ultimate disposition of those tailings were available.

In May 1991, PADER visited the South Union Avenue/Austin Avenue location to monitor for radon because radiation contamination had previously been discovered in the back yard of 133 Austin Avenue, the property adjacent to the warehouse. During this visit, radiation survey instruments indicated the presence of significant levels of radioactive contamination within the house at that location. PADER obtained soil and wipe samples for further analysis.

On June 7, 1991, PADER notified EPA of its findings and requested assistance. A joint PADER-EPA site assessment confirmed the presence of radiological contamination at 133 Austin Avenue at levels that warranted immediate action. Based on the data provided by the PADER analyses and the results of the joint survey, the U.S. Agency for Toxic Substances and Disease Registry (ATSDR) recommended the relocation of the residents of the house at 133 Austin Avenue and the dismantlement of the warehouse.

On June 19, 1991, a team of radiation specialists from the EPA National Air and Radiation Environmental Laboratory (NAREL) in Montgomery, Alabama, arrived to conduct an assessment. The warehouse and the adjacent residential dwelling (133 Austin Avenue) were found to be heavily contaminated with radioactive materials. In November and December of 1991, EPA used a special radiation-detection van to conduct a 12.5 square mile search in Delaware County and a small portion of the adjacent City of Philadelphia. EPA also conducted radiological surveys of the properties which were suspected to be contaminated. The EPA testing has shown that approximately 40 properties within a two-mile radius of the site of the former Cummings radium processing facility have become contaminated with radium 226 and thorium 230.

EPA has conducted CERCLA Removal Actions at a number of the contaminated properties. Removal Actions were selected for those properties that posed an immediate endangerment and/or which could be addressed using Removal Action authorities within the constraints of available funding. These Removal Actions have included the temporary relocation of residents of several of the properties; complete dismantlement of the warehouse at South Union and Austin Avenues; dismantlement of the structure at 133 Austin Avenue; soil removals at a number of the properties; and removals of plaster, stucco, and concrete at selected properties. Additional Removal Actions are ongoing.

On July 1, 1993, EPA issued a Proposed Remedial Action Plan describing five alternatives considered as possible remedial actions for twenty-one of the parcels subject to this Record of Decision. The July 1, 1993 Plan also designated EPA's preferred alternative for each of the properties. EPA requested comments on the Plan and opened a public comment period. In response to that Plan, EPA received numerous letters from citizens and public officials requesting that EPA reconsider its preferred alternatives for several of the parcels. In addition, EPA gathered additional information useful in the evaluation of remedial alternatives for the properties. Following consideration of the responses to the first Proposed Remedial Action Plan, and of the above-described information, EPA issued, on March 2, 1994, a Revised Proposed Remedial Action Plan for the twenty-two parcels which are subject to this Record of Decision and

opened a public comment period on the new plan. Notice of a minor modification to the Revised Proposed Remedial Action Plan was published in local newspapers on March 30, 1994. A brief discussion of the differences between the July 1, 1993 Proposed Remedial Action Plan and the March 2, 1994 Revised Proposed Remedial Action Plan is found in Section 13 of this ROD.

### 3. COMMUNITY PARTICIPATION

The original Proposed Remedial Action Plan, together with documents supporting that plan (the administrative record file), were placed by EPA in a public information repository located near the Site at the Lansdowne Borough Public Library, Lansdowne, Pennsylvania and have been available for public review beginning on July 1, 1993. In addition, Site-related documents have been maintained at the Region III office. Notice of the availability of these documents and a brief description of EPA's Proposed Remedial Action Plan was published in the PHILADELPHIA INQUIRER on July 1, 1994, and in the NEWS OF DELAWARE COUNTY and the DELAWARE COUNTY DAILY TIMES on June 30, 1993. In both the Proposed Remedial Action Plan and the newspaper notifications, the public was advised of the opportunity for a public meeting. A public comment period was held from July 1, 1993 to August 31, 1993. A public meeting was held on July 19, 1993 at the Yeadon Borough Hall, Yeadon, Delaware County, Pennsylvania. Approximately 300 citizens attended that meeting.

EPA received more than 750 letters in response to the original Proposed Remedial Action Plan expressing dissatisfaction with that Plan. Following careful consideration of these letters and of additional information relating to the remedial alternatives described in the July 1993 plan, EPA issued a Revised Proposed Remedial Action Plan on March 2, 1994. Notification of the availability of the Revised Plan and the updated administrative record file was published in the three newspapers noted above. A public meeting was held on March 15, 1994 at the Beverly Hills Middle School, Upper Darby, Pennsylvania. On March 30, 1994, EPA published notice of a minor modification to the Revised Plan affecting four of the parcels. The notice made clear that comments submitted during the public comment period could address this modification. A response to the comments received during the March 2, 1994 through April 30, 1994 public comment period is included in the Responsiveness Summary which is part of this Record of Decision. Transcripts of both of the public meetings are included in the Administrative Record for the Site. A brief discussion of the differences between the July 1, 1993 Proposed Remedial Action Plan and the March 2, 1994 Revised Proposed Remedial Action Plan is found in Section 13 of this ROD.

The community participation procedures outlined above were conducted in compliance with sections 113(k) and 117 of CERCLA, 42 U.S.C. [Para] 9613(k) and 9617. EPA has had extensive contact with community members from the commencement of response actions at the Site through the present and has strived to be responsive to all community concerns.

### 4. SCOPE AND ROLE OF THE RESPONSE ACTION

This Record of Decision addresses the remedial actions selected for twenty-two properties within the Site that are presently on the NPL. The properties are in the municipalities of Lansdowne Borough, East Lansdowne Borough, Upper Darby Township, Aldan Borough, and Darby Borough in Delaware County, Pennsylvania and are identified in Section 1 of this Record of Decision. The remedial actions selected for these parcels are necessary in order to respond to environmental and public health threats presented by contamination at the properties (see Section 5). Eighteen (18) other properties have been, or are being, cleaned up under EPA's removal authorities.

EPA is considering appropriate measures to further characterize ground water contaminated with uranium recently discovered (June 1994) in the vicinity of the former Cummings facility. EPA does not expect that this ground water contamination affects any of the residential properties listed in this Record of Decision. Remedial actions, if any, deemed appropriate by EPA to address this ground water contamination would be announced in a subsequent Record of Decision.

### 5. SUMMARY OF SITE CHARACTERISTICS

The remedial actions selected in this Record of Decision are intended to address the principal environmental threat at the properties presented by the release, or the substantial threat of release, of hazardous substances from, among other things, contaminated soils and building materials at each location. Contamination at each property is summarized as follows:

#### Lansdowne Borough

- (1) 216 Wayne Avenue - This is a house which was used as a two-apartment rental property. The renters have been temporarily relocated by EPA. Contaminated areas include the basement walls, the porch foundation, the fireplace chimney, and stucco walls.

Mortar samples revealed radium contamination ranging to 637 pico-curies per gram (pCi/g). An estimated 104 cubic yards of soil are contaminated with radium up to 43 pCi/g.

- (2) 218 Wayne Avenue - This is an owner-occupied single-family house in which the owner operated a dental laboratory. The owner has been temporarily relocated by EPA. Radiation-contaminated areas include the foundation walls, support pillars, the chimney, and soil under the basement floor. Mortar samples revealed radium contamination ranging to 539 pCi/g. An estimated 320 cubic yards of soil are contaminated with radium and show specific activities ranging to 41.7 pCi/g.
- (3) 219 Wayne Avenue - This is a single-family house in which the owner still resides. Radium contamination is found in the basement walls, exterior stucco, the porch foundation, and the fireplace and chimney. Mortar samples revealed radium contamination ranging to 647 pCi/g. Approximately 119 cubic yards of soil are estimated to be contaminated with radium and display specific activities ranging to 234 pCi/g.
- (4) 42 South Union Avenue - The contaminated structure is an addition to a delicatessen used to store business supplies. The addition can be removed with minimal intrusion on the main portion of the building. The mortar in the brick foundation of the addition has radium contamination ranging to 240 pCi/g.
- (5) 6 East Plumstead Avenue - This is a large single-family house in which the owners still reside. Radium contamination exists in the basement walls and support pillars and in the porch foundation walls. Mortar samples display specific activities ranging to 460 pCi/g.

An estimated 197 cubic yards of soil are contaminated with radium and have specific activities ranging to 123 pCi/g.

- (6) 10 East Plumstead Avenue - This is a single-family house in which the owner still resides. The basement walls and the stone side walls of the front porch are contaminated with radium. Mortar between the stones has specific activities ranging to 249 pCi/g. An estimated 47 cubic yards of soil are contaminated with radium and have specific activities ranging to 277 pCi/g.
- (7) 16 East Plumstead Avenue - This is a single-family house in which the owner still resides. Radium contamination exists in all basement walls. Mortar samples have specific activities ranging to 1019 pCi/g. An estimated 53 cubic yards of soil are contaminated with radium with specific activities ranging to 28.4 pCi/g.
- (8) 237 North Lansdowne Avenue - The building at this parcel is a large single-family house in which the owner still resides. All basement walls, support columns, the concrete basement floor, fill material under the concrete floor, and rubble in a crawl space are contaminated with radium. Mortar samples have specific activities ranging to 683 pCi/g. Approximately 153 cubic yards of soil near the house are contaminated with radium. Specific activities of soils range to 107 pCi/g.
- (9) 133 Austin Avenue - This is a vacant lot measuring 21 feet x 100 feet. The property was cleaned of radioactive materials by EPA as part of the Removal Action conducted at the Site. A 3-story house had occupied the lot prior to EPA's Removal Action. That house was completely dismantled and disposed of as part of the cleanup of the property.
- (10) Austin Avenue at South Union Avenue - This is an area formerly occupied by the Cummings processing facility and includes a

portion of the adjacent railroad right-of-way used by the South Eastern Pennsylvania Transportation Authority (SEPTA), as well as adjacent portions of South Union and Austin Avenues. The total land area is approximately 150 feet x 150 feet. The soils in this area are contaminated with radium. Specific activities in the soil samples range to 1471 pCi/g. The contamination is not uniform over the area, but is found at depths to 24 feet. The contamination also extends under Austin Avenue and might extend under South Union Avenue. An estimated 12,000 cubic yards of soils are contaminated.

In addition, ground water in the immediate vicinity has recently been found to be contaminated with uranium at levels up to 1904 picocuries per liter (pCi/l).

#### East Lansdowne Borough

- (11) 34 Lewis Avenue - The building at this location is a single-family house from which the resident owners have been temporarily relocated by EPA. The property is extensively contaminated with radium. All basement walls, the soil under the basement floor, support pillars, the front sidewalk and the front steps are contaminated. Mortar in the basement walls has specific activities ranging to 1052 pCi/g. An estimated 257 cubic yards of soil are contaminated with radium. Specific activities of the soils range to 75 pCi/g.
- (12) 211 Penn Boulevard - This is a single family house. EPA has offered the resident owners temporary relocation, but they have chosen to remain in the house. The four basement walls and the porch support columns are contaminated with radium. Mortar in the basement has specific activities ranging to 1105 pCi/g. Approximately 128 cubic yards of soil are estimated to be contaminated with radium. Specific activities of the soils range to 180 pCi/g.
- (13) 151 Lexington Avenue - This is a single-family house in which the upper floor has been converted into an apartment. The owners still occupy the house. The basement walls and the plaster on the chimney and fireplace are contaminated with radium. Specific activities of the mortar in the basement walls ranges to 421 pCi/g. An estimated 198 cubic yards of soil are contaminated and the specific activities range to 118 pCi/g.

#### Upper Darby Township

- (14) 500 Harper Avenue - The building on the property is a single-family house and the owners have been temporarily relocated by EPA. The stone walls of the basement, first floor, and second floor are all contaminated with radium. Three support columns and the soil/gravel beneath the concrete basement floor are also contaminated with radium. Specific activities in mortar samples ranged to 958 pCi/g. An estimated 96 cubic yards of soil outside the house are contaminated with radium. The specific activities of the soils range to 88 pCi/g.
- (15) 346 Owen Avenue - This is a single-family house which is currently occupied by the owner. Portions of the structure contaminated with radium include the concrete footer of the porch, the stucco on the porch exterior wall, the west wall foundation footer, and the concrete slab and associated footers on the northwest corner of the house. The highest specific activity found during sampling was 479 pCi/g in the porch footer. An estimated 58 cubic yards of soil are contaminated with radium. The specific activities of the soils range to 127 pCi/g.
- (16) 310 Shadeland Avenue - The building at this property is a



multi-family rental dwelling with five apartments. The chimney, fireplaces, porch walls, basement, main entrance walls, soil under the basement, main entrance floor, and mortar in the north and south stone walls are contaminated with radium. Mortar samples revealed specific activities ranging to 1335 pCi/g. Approximately 6 cubic yards of soils outside the building are estimated to be contaminated with radium with specific activities ranging to 31 pCi/g.

- (17) 3723 Huey Avenue - This is a single-family house in which the owners still reside. Radium contamination is extensive and present in all basement walls, the chimney, the support columns, the east room foundation, the concrete pad on the south side of the first floor east room, all second floor stone walls, the

third floor west side stone wall, the front door step and concrete pad, and the soil under the garage floor. Specific activities in mortar samples range to 354 pCi/g. An estimated 58 cubic yards of soil are contaminated with radium with specific activities ranging to 82 pCi/g.

#### Aldan Borough

- (18) 64 South Clifton Avenue - The building on this parcel is a single-family dwelling in which the owner still resides. The stone foundation walls on the north, south, and west sides of the house, and the support columns on the east side are contaminated with radium. The soil under the porch and the mortar in the north wall chimney are also contaminated with radium. Specific activities of mortar samples range to 467 pCi/g. Approximately 17 cubic yards of soil are contaminated with radium with specific activities ranging to 89 pCi/g.

#### Darby Borough

- (19) 617/619 Pine Street - This structure is a duplex
- (20) currently occupied by the owners. Radium contamination exists throughout the entire south wall, the entire firewall which divides the duplex structure, and in a band (approximately 5-6 bricks wide) at approximately 6 feet above ground across the lengths of the north, east, and west faces of the duplex. Mortar samples have specific activities ranging to 671 pCi/g. An estimated 7 cubic yards of soil is contaminated with radium with specific activity of 19 pCi/g.
- (21) 621/623 Pine Street - Similar to 617/619 Pine Street, the
- (22) structure is a duplex occupied by the individual owners. Radium contamination is present throughout the entire south, west, and east walls and the south foundation wall. Specific activities in the mortar range to 567 pCi/g.

## 6. SUMMARY OF SITE RISKS

With the exception of the lot at 133 Austin Avenue, all of the properties listed previously are contaminated with radium 226 and thorium 230 (remedial action at 133 Austin Avenue is limited to offsite relocation of the business formerly occupying the structure dismantled on that parcel). In addition, the property at South Union Avenue and Austin Avenue (the site of the former Cummings facility) is contaminated with uranium 238. These substances are radioactive metallic elements and emit both alpha and gamma radiation. Radium 226 has a half-life of 1,600 years; thorium 230 has a half-life of 80,000 years and uranium 238 has a half-life of 4,500,000,000 years (this means that it will take this long for one-half of the mass of these contaminants to decay).

Gamma radiation is an external and internal radiation hazard. It is composed of high energy photons that penetrate through the skin and, often, through the human body, much like x-rays. Alpha radiation, comprised of large particles composed of two protons and two neutrons, is the same as the nucleus of a helium atom. These large particles are associated with a relatively large amount of energy, but this energy is readily dissipated when it passes through only a few centimeters of air. It may also be absorbed by a small amount of matter as thin as a piece of paper or the dead cell layer on the outer surface of human skin. For this reason, alpha radiation is an internal hazard to humans and is considered to be particularly dangerous to the lungs and bones. Both alpha and gamma radiation are considered to be carcinogenic to humans.

The radioactive decay of radium 226 results in the production of radon 222. Radon 222 is a colorless and odorless gas which has a half-life of 3.8 days. The radioactive decay of radon 222 results in the occurrence of several subsequent radioactive elements - the so-called "radon daughters." These radon daughters are also alpha and beta emitters and include polonium 218, lead 214, bismuth 214, and polonium 214. These radioactive elements are not gases but remain suspended in the air in atomic form. In doing so, they can become attached to dust and smoke particles which might potentially be inhaled by people. Upon inhalation, these radioactive elements lodge in the lung tissue, which has no dead cell layer to protect itself from the alpha emissions. These alpha emissions are believed to be a potential cause of

lung cancer to persons exposed to radium contamination.

The threat posed by the contamination at the properties is due to the significant possibility that radiological contamination may spread into the environment in an uncontrolled fashion in the future. The contaminants present within the structures and in soils outside will most certainly outlast the structures themselves. As indicated above, radium 226 has a half-life of 1,600 years and thorium 230 has a half-life of 80,000 years. Before these contaminants cease emitting harmful radiation, the soils, mortar, stucco, cement, plaster, and other contaminated materials will very likely be moved off the properties through renovation or demolition or through other means such as disintegration or fire. Uncontrolled movement of these materials creates the risk of further exposure by persons and animals to radiological contamination. This risk will continue until the contaminated materials decay completely or until such materials are removed and properly disposed.

For example, dusts created from repair and renovation work on contaminated structures could be ingested and inhaled by construction workers and by nearby residents and visitors in the surrounding neighborhood. Such repair and renovation work would probably result in persons being exposed to greater than the nonoccupational inhalation limit of one-tenth of a rem per year (this does not take into account any other whole body exposure from gamma radiation that would result from the presence of the radioactive materials). Contaminated materials removed from the structures during renovation or demolition and contaminated soils could be used as fill in other locations resulting in the contamination of those areas and of persons who may be exposed to them. The materials could also be disposed of at demolition waste or sanitary landfills which are not suitable for disposal of radiation-contaminated materials, resulting in the contamination of these locations and of persons who may operate such disposal facilities. A fire at a contaminated structure could result in the release of radiation-contaminated dusts and the disposal of contaminated materials in unsuitable locations.

Radium 226, thorium 230, uranium 238, radon 222 and the radon daughters are all radionuclides. Radionuclides are listed as hazardous substances in federal regulations promulgated at 40 C.F.R. [Para] 302.4 and, therefore, are hazardous substances for the purposes of the Superfund law.

Because of the significant possibility that these harmful contaminants may be moved in an uncontrolled fashion, and thereby create new risks to human health as a result of such movement well before the radioactive materials have completely decayed, EPA believes that actual or threatened releases of hazardous substances from this Site, if not addressed by proper response actions, present a current or potential threat to public health, welfare or the environment.

## 7. RISK ASSESSMENT CONCLUSION

Actual or threatened releases of radioactive hazardous substances at the Site, if not addressed by implementing the response actions selected in this Record of Decision, may present an imminent and substantial endangerment to public health, welfare, or the environment, based on the risks described in Section 6.

## 8. SUMMARY OF ALTERNATIVES

This section identifies remedial alternatives identified in the Revised Proposed Remedial Action Plan and considered for implementation at each of the twenty-two radiation-contaminated properties subject to this Record of Decision. With the exception of the "No Action" alternative, and excluding the remedial action to be implemented at 133 Austin Avenue, each remedial action alternative involves, at a minimum, removal, transportation, and disposal of all radiologically-contaminated building materials and soils from the property and relocation of persons residing on the property for at least the duration of the work to be performed at that location.

In summary, the No Action alternative, which EPA is required to consider under the NCP, would involve no further remedial action for that property. The "removal and repair" alternative (Alternative 2) would involve removal of all radiologically-contaminated material from the property, and measures to restore structures for continued occupancy. Alternative 3 would permit the parcel owner to choose either (a) demolition of the radiologically-contaminated structure and replacement of the structure on the existing lot, (b) demolition of the radiologically-contaminated structure and relocation to another parcel, or (c) removal of all radiologically-contaminated material from the property, and measures to restore structures for continued occupancy (Alternative 2).

The remedial action alternatives are discussed in greater detail in this section.

### 1. NO ACTION

This alternative would involve no further remedial action and would not require the expenditure of

additional funds for remedial action at the specific property. No applicable or relevant and appropriate requirements (ARARs) are associated with this alternative.

## 2. CONTAMINATION REMOVAL AND BUILDING REPAIR

This alternative includes temporary relocation of residents where required, removal of radiation-contaminated soils and structural components of buildings, offsite disposal of wastes, repair of the affected structure, and rehabilitation by the residents.

All soils in residential and potentially residential settings that have site-related radium 226 contamination in excess of 5 pico-curies per gram (pCi/g) will also be removed. Properties that EPA determines are unlikely to become residential will have soils removed to the 5 pCi/g level if those soils have radium 226 contamination exceeding 5 pCi/g (above background) in the top 15 centimeters and/or 15 pCi/g (above background) in soils below 15 centimeters, averaged over 100 square meters. Institutional controls to restrict the future construction of residential dwellings and/or the depth of building footings and foundations will be implemented if EPA is unable to reduce contamination to the 5 pCi/g level at these non-residential properties.

The costs of this alternative would be different for each of the properties.

Major federal ARARs for this alternative include 40 C.F.R. Part 192, Subpart B (Standards for Cleanup of Land and Buildings Contaminated with Residual Materials from Inactive Uranium Processing Sites) (relevant and appropriate); 10 C.F.R. Part 20, Subpart D (Radiation Dose Limits for Individual Members of the Public) (relevant and appropriate); and 40 C.F.R. [Para] 61.145 (National Emission Standards for Asbestos: Standard for Demolition and Renovation) (applicable). Major State ARARs include 25 Pa. Code Chapter 24 (National Emission Standards for Hazardous Air Pollutants) (limited to adoption of standards set forth in 40 C.F.R. [Para] 61.145) (applicable); 25 Pa. Code [Para][Para] 123.1 and 123.3 (Prohibition of Certain Fugitive Emissions) (Fugitive Particulate Matter) (applicable); 25 Pa. Code [Para] 123.31 (emission of malodorous air contaminants (applicable); 25 Pa. Code [Para] 123.41 (emission of visible air contaminants) (applicable); 25 Pa. Code 127.1 (air contaminant sources) (applicable); and 25 Pa. Code [Para] 219.21(a)(3) (Maximum Permissible Levels of Radiation from External Sources) (applicable).

## 3. CONTAMINATION REMOVAL AND DISPOSAL AND EITHER:

OPTION A: BUILDING DISMANTLEMENT, CONTAMINATION DISPOSAL, AND BUILDING REPLACEMENT;

OPTION B: BUILDING DISMANTLEMENT, CONTAMINATION DISPOSAL, AND OFFSITE RELOCATION; OR

OPTION C: BUILDING REPAIR (AS IN ALTERNATIVE 2)

For the purposes of this alternative, each property owner would choose to either have the contaminated structure replaced at the same location (Option A); have his/her family relocated to an offsite parcel containing an existing comparable replacement structure (Option B); or have the building repaired, where practicable, as noted above in Alternative 2 (Option C). This choice would be made by the property owner after issuance of this Record of Decision, except where EPA has determined that all but one of the options is impracticable or infeasible (see EPA's Selected Alternatives, below).

All soils in residential and potentially residential settings that have site-related radium 226 contamination in excess of 5 pico-curies per gram (pCi/g) will also be removed. Properties that EPA determines are unlikely to become residential will have soils removed to the 5 pCi/g level if those soils have radium 226 contamination exceeding 5 pCi/g (above background) in the top 15 centimeters and/or 15 pCi/g (above background) in soils below 15 centimeters, averaged over 100 square meters. Institutional controls to restrict the future construction of residential dwellings and/or the depth of building footings and foundations will be implemented if EPA is unable to reduce contamination to the 5 pCi/g level at these non-residential properties.

Under Option A and Option B of this alternative, contaminated structures would be completely dismantled and disposed of offsite. Radiologically-contaminated soil would also be removed and disposed of offsite.

Under Option A, the Federal Government will fund construction of a building to replace the structure dismantled by EPA. The new building will be constructed on the lot previously occupied by the razed building after all debris and contaminated soils have been removed from the parcel. The new building will have floor space approximately equivalent to the floor space of the building that was dismantled, and will be constructed on the same lot in accordance with current building codes. It is anticipated that the newly constructed buildings will retain the same architectural character and "curb appeal" as the existing structures, but will be constructed using modern materials and modern methodologies. Certain interior and

exterior changes might be necessary in order to meet existing codes, and to accommodate modern construction materials and methods. For example, current stone foundation walls will be replaced with alternate masonry construction.

The property owners selecting Option A will be presented with, by the Federal Government, building plans/designs/features which are as similar to the current structures as practicable. Each property owner will participate in the selection of a building design, materials, and features for his/her respective property. Each property owner's selections of designs, materials, and amenities will be formalized in writing. The Government will then fund construction of that building. Changes to the design, materials and features selected by the owner will not be permitted except to the extent that the owner agrees to pay all costs associated with such changes and such changes will not substantially delay construction of the building. Following completion of the structure, the owner will be relocated back to the original parcel. The schedule for construction of replacement buildings cannot be estimated at this time but will depend upon, among other things, the number of property owners that select Option A, the availability of qualified building contractors at the time the response action is performed, and the length of time required to completely dismantle the original structures and clean the lots. The Federal Government will cease payment for any temporary residence at the time the Federal Government determines that the replacement structure has been completed in accordance with the plans selected by the owner. The cost of Option A is different for each property.

Under Option B, EPA will dismantle the contaminated building, dispose of building and soil wastes offsite, and backfill soil excavations. No building replacement will take place at the affected parcel. The Government will acquire the property from the owner and, if desired by the owner, provide relocation benefits to which they may be entitled. These benefits include reimbursement of moving expenses and provision of purchase supplements to enable the owner to relocate to a comparable replacement property.

With respect to those structures occupied by the owners, a replacement property available under Option B will be a "comparable replacement dwelling" within the meaning of 49 C.F.R. [Para] 24.2(d), which means that the dwelling will be (1) decent, safe, and sanitary; (2) functionally equivalent to the razed structure; (3) adequate in size to accommodate the occupants of the razed structure; (4) in an area not subject to unreasonable adverse environmental conditions; (5) in a location not less desirable than the location of the razed structure with respect to public utilities and commercial and public facilities, and reasonably accessible to the owner's place of employment; (6) on a site typical in size for residential development; (7) on the market and available to the former occupants at the time the relocation must be performed; and (8) within the financial means of the relocated persons. The owners of properties not used as a residence for the owners will be provided with a comparable replacement property which meets the eight criteria described above. Offsite relocations under Option B will be performed using procedures and practices currently used in administering the Uniform Relocation Assistance and Real Property Acquisition Policies Act (42 U.S.C. Chapter 61) and its implementing regulations (49 C.F.R. Part 24) to the maximum extent practicable. Under those procedures, title to the original parcel will be acquired by the United States in order to perform the relocation. Pursuant to section 104(j) of CERCLA, 42 U.S.C. [Para] 9604(j), the Commonwealth of Pennsylvania must agree to accept transfer of the property following completion of the remedial action. The cost of implementing this option would vary according to the individual properties involved.

At those parcels where owners select Option C, EPA will implement all actions described in Alternative 2, above. The costs of this alternative would be different for each of the properties.

ARARs for Alternative 3 are the same as for Alternative 2.

## 9. SUMMARY OF THE COMPARATIVE ANALYSIS OF ALTERNATIVES

This section provides a description of the nine criteria EPA is required to consider under CERCLA and the NCP in evaluating remedial alternatives and an analysis of the alternatives considered by EPA for implementation at the properties covered by this Proposed Remedial Action Plan. The nine criteria are:

- (1) Overall Protection of Human Health and Environment. This criteria addresses whether the remedial alternative can adequately protect human health and the environment from unacceptable risks posed by the hazardous substances by eliminating, reducing, or controlling exposures to levels established during development of remediation standards.
- (2) Compliance with ARARs. This criteria addresses whether the remedial alternative can attain applicable or relevant and appropriate requirements under federal environmental laws and state environmental or facility siting laws or provide grounds for invoking a waiver established under CERCLA.

- (3) Long-Term Effectiveness and Permanence. This criteria refers to the ability of an alternative to maintain reliable protection of human health and the environment over time and considers, among other things, the magnitude of residual risk remaining from untreated waste or treatment residuals and the adequacy and reliability of containment or institutional controls.
- (4) Reduction of Toxicity, Mobility, or Volume Through Treatment. This criteria addresses the degree to which an alternative employs treatment methods to reduce the toxicity, mobility, or volume of hazardous substances at the site.
- (5) Short-Term Effectiveness. This criteria addresses short-term impacts of an alternative on, among others things, the community, workers, and the environment during implementation of the alternative until protection is achieved.
- (6) Implementability. This criteria refers to the ease or difficulty of implementing an alternative and includes, among other things, technical feasibility, administrative feasibility, and availability of services and materials.
- (7) Cost. This criteria requires evaluation of the capital costs, annual operation and maintenance costs, and net present value of such costs.
- (8) State Acceptance. This criteria requires consideration of the State's position and key concerns relating to EPA's preferred remedial alternative and other alternatives and the State's comments on ARARs or the proposed use of waivers.
- (9) Community Acceptance. This criteria requires consideration of the community's concerns on the proposed remedial action plan articulated during the comment period.

#### OVERALL PROTECTION OF HUMAN HEALTH AND THE ENVIRONMENT

Alternative 1 (No Action) provides no protection. The remaining two alternatives provide adequate protection of public health, welfare and the environment. In Alternatives 2 and 3, all radiation-contaminated structural components of the buildings will be removed offsite to a permitted radiation waste disposal facility. All soils in residential and potentially residential settings that have site-related radium 226 contamination in excess of 5 pico-curies per gram (pCi/g) will also be removed.

The cleanup of soils to 5 pCi/g will result in radon 222 concentrations, in future homes built on the affected properties, which are no greater than the radon 222 concentrations that would have resulted if the Site-related radium 226 contamination had not occurred.

Properties that are unlikely to become residential will have soils removed to the 5 pCi/g level as noted above if those soils have radium 226 contamination exceeding 5 pCi/g (above background) in the top 15 centimeters and/or 15 pCi/g (above background) in soils below 15 centimeters, averaged over 100 square meters. Properties in this category include streets, parks, and railroad rights-of-way.

Alternatives 2 and 3 will render the residential properties available for unlimited access and unrestricted use. Complete cleanup of the contamination at the former Cummings facility and the adjacent streets and railroad right-of-way to the 5 pCi/g level prescribed for residential properties might prove to be impracticable. Such properties where cleanup to the residential level is impracticable will require institutional controls to restrict the future construction of residential dwellings and/or the depth of building footings and foundations.

#### COMPLIANCE WITH ARARS

Alternative 1 (No Action) does not trigger ARARs. The other alternatives, including EPA's preferred alternative for each property, will comply with all Federal and State ARARs.

#### LONG-TERM EFFECTIVENESS AND PERMANENCE

The No Action alternative would have no effect on the existing contamination. Each of the other alternatives will result in the elimination of the site-related radiation contamination where such

contamination currently exists. Under Alternatives 2 and 3, the contaminated wastes will be removed offsite to a permitted radiation waste disposal facility; the properties which are currently residential will be available for unlimited access and unrestricted use. The former Cummings facility property and streets, parks, and railroad rights-of-way that have radium 226 contamination exceeding 5 pCi/g (above background) in the top 15 centimeters and/or 15 pCi/g (above background) in soils below 15 centimeters, averaged over 100 square meters, may require institutional controls to restrict the future construction of residential dwellings and/or the depth of building footings and foundations if EPA is unable to reduce contamination to the 5 pCi/g level.

#### REDUCTION OF TOXICITY, MOBILITY, OR VOLUME THROUGH TREATMENT

No reductions of toxicity, mobility, or volume through treatment of the wastes are anticipated at this time under any of the alternatives. Radiation-contaminated wastes will be shipped offsite for disposal at a permitted facility.

#### SHORT-TERM EFFECTIVENESS

The No Action alternative would have no short-term effectiveness. Under Alternatives 2 and 3, the resident owners and tenants of occupied structures will be relocated during implementation of the remedial action. The remedial activities will be conducted so as to prevent radiation exposure to the local residents and to site workers.

#### IMPLEMENTABILITY

The No Action alternative requires no further remedial action and implementation is therefore not relevant. The remaining two alternatives are implementable to varying degrees depending on structural design and integrity and the degree to which each affected structure is contaminated.

Alternative 2 (and Alternative 3, Option C), building decontamination and repair, is the least disruptive to the lives of the affected owners as it will leave the existing residence in place. However, this alternative is practicable only for 346 Owen Avenue, 211 Penn Boulevard, 6 and 10 East Plumstead Avenue, and 151 Lexington Avenue as these structures are less contaminated relative to the other affected structures and/or are more readily repairable given the extent and location of such contamination. At these locations, Alternative 2 (and Alternative 3, Option C) might require temporary relocation of residents for up to one year.

Alternative 3, Option A, demolition and rebuilding of the structures, is implementable for most of the existing structures, but with certain changes in design. Design changes would be necessary because of the unavailability of certain construction materials and the requirements of current construction codes. The houses at 500 Harper Avenue and 3723 Huey Avenue, for example, are stone structures from the basements to the rooflines; this type of construction is essentially unavailable today. In addition, the small size of certain lots (e.g., 133 Austin Avenue) will preclude the construction of replacement structures having equivalent floor space while complying with current building codes. Further, Alternative 3, Option A, is less implementable than Option B (permanent offsite relocation) and Option C (contamination removal and building repair) to the extent that Option A would require a significantly greater degree of management oversight for a longer period than would be required for the other options and because of the potential complications associated with housing construction. Note Options A and C will require two relocation events per structure (relocation off-site during contamination removal and building repair or construction and relocation back to the finished structure) for those resident owners who have not been relocated offsite. Option B would, in some cases, entail only one relocation event (relocation to the permanent replacement dwelling). Relocation to the temporary residence while the affected structure is demolished and rebuilt may be necessary for one year or longer.

Alternative 3, Option B (permanent off-site relocation) is readily implementable for all structures, except 42 South Union Avenue (the structure to be dismantled is a small addition to a delicatessen for which a comparable structure is not likely to be available offsite). Unlike Option A (demolition and rebuilding of the structures), Option B may in some cases involve only one relocation event where an offsite structure is found prior to remediation at the affected structure.

#### COST

The No Action alternative would involve no further costs for remedial action. Alternative 2 (and Alternative 3, Option C), building repair, was considered to be cost-effective only for 6 and 10 East Plumstead Avenue, 211 Penn Boulevard, 151 Lexington Avenue, and 346 Owen Avenue. Alternative 3, Option A, was considered for all of the properties except for 133 Austin Avenue (the lot at that location is too narrow to allow rebuilding under current ordinances) and the former Cummings warehouse building (the warehouse was structurally deficient for reasons unrelated to the contamination, and was in danger of

collapse). Option B was considered for all of the properties except 42 S. Union (an offsite structure would be an impracticable replacement of the delicatessen addition at 42 S. Union Avenue) and the former Cummings facility location (see above). Cost estimates to implement the various alternatives are expressed as present values and are shown in Table 1. In that table, EPA's selected remedies are indicated with asterisk (\*). All costs are estimates that may vary according to the accuracy of current contamination reports, lengths of time required to implement the remedial actions at the individual properties, actual bids received from remedial contractors and other factors.

The cost estimates listed include the costs of temporary relocation of residents, where applicable, for Alternatives 2 and 3. The temporary relocation costs are estimated at \$2000 per month for a period of one year. Therefore, the cost estimates for Alternatives 2 and 3 include an estimated \$24,000 temporary relocation cost per household for owner-occupied dwellings. Since 617/619 and 621/623 Pine Street are twin houses, each represents two households. In these instances, the cost estimates for Alternative 3, Options A and B (repair is not practicable), include an estimated \$48,000 temporary relocation cost to accommodate the two households in each twin house.

No cost estimates are given for any of the properties under Alternative 2 (or Alternative 3, Option C), except for 6 and 10 East Plumstead Avenue, 211 Penn Boulevard, 151 Lexington Avenue, and 346 Owen Avenue, because building repairs are not feasible.

The cost estimate shown under Alternative 3, Option A, for 42 South Union Avenue is for the demolition, removal, and reconstruction of an unoccupied addition to a delicatessen. Repairs would be made to the adjacent property, as required.

<Figure>

Most of the properties will require some removal of radiation-contaminated soil. Soil amounts vary with location. Cost estimates for soil remediation for the various properties are included in the estimates shown in Table 1.

Approximately 12,000 cubic yards of soil are contaminated at the former Cummings facility property at South Union and Austin Avenues. This soil will be removed and disposed at an estimated cost of \$1920 per cubic yard. Building replacement at this property (exclusive of the former Cummings warehouse which was structurally deficient for reasons unrelated to the contamination and was in danger of collapse) is estimated to cost approximately \$60,000, and soil cleanup is estimated to cost \$23,040,000, for a total of \$23,100,000.

The total estimated cost of EPA's selected alternatives ranges from approximately \$36,642,250 (assuming that Option A is chosen by all property owners to whom it is available) to approximately \$38,581,200 (assuming that Option B is chosen by all property owners to whom it is available).

#### STATE ACCEPTANCE

The Commonwealth of Pennsylvania has reviewed and commented on a draft of the Record of Decision. The Commonwealth concurs with the selected remedies. A copy of the concurrence letter is attached.

#### COMMUNITY ACCEPTANCE

The preferences for remediation which have been expressed by the individual property owners verbally and by letter to EPA have been carefully considered by EPA for the purposes of this Record of Decision. Numerous citizens and public officials commented on the Revised Proposed Remedial Action Plan.

#### 10. THE SELECTED REMEDIES

After careful evaluation of the remedial action alternatives, the nine criteria set forth in the NCP, and the public comments, EPA has selected remedial action alternatives for each of the respective properties subject to this Record of Decision. The remedial actions will be implemented in accordance with the Performance Standards identified in Section 11 of this Record of Decision. The remedial actions selected by EPA are as follows:

##### Lansdowne Borough

|                             |               |
|-----------------------------|---------------|
| 216 Wayne Avenue:           | Alternative 3 |
| 218 Wayne Avenue:           | Alternative 3 |
| 219 Wayne Avenue:           | Alternative 3 |
| 237 North Lansdowne Avenue: | Alternative 3 |
| 6 East Plumstead Avenue:    | Alternative 3 |
| 10 East Plumstead Avenue:   | Alternative 3 |



16 East Plumstead Avenue: Alternative 3  
42 South Union Avenue: Alternative 3A[1]  
133 Austin Avenue: Alternative 3B[2]

The site of the former  
Cummings facility at S.  
Union Ave. and Austin Avenue: Alternative 3A[3]

Upper Darby Township

500 Harper Avenue: Alternative 3  
346 Owen Avenue: Alternative 2  
310 Shadeland Avenue: Alternative 3  
3723 Huey Avenue: Alternative 3

Aldan Borough

64 South Clifton Avenue: Alternative 3

East Lansdowne Borough

34 Lewis Avenue: Alternative 3  
211 Penn Boulevard: Alternative 3  
151 Lexington Avenue: Alternative 3

<Footnote>

1 Replacement of the storage area addition to the delicatessen at this property with an offsite storage area would be impracticable.

2 EPA has determined that a replacement structure cannot be constructed on this parcel under current building codes.

3 The former Cummings facility building would be neither rebuilt nor replaced with an off-site structure since the building was structurally deficient for reasons unrelated to the contamination and was in danger of collapse prior to demolition by EPA. Replacement of the "wood shop" building with an off-site property would be impractical.

</footnote>

Darby Borough

617 Pine Street: Alternative 3[4]  
619 Pine Street: Alternative 3[4]  
621 Pine Street: Alternative 3[4]  
623 Pine Street: Alternative 3[4]

<Footnote>

4 Rebuilding on-site can occur only if the owner of each residence in the duplex chooses this option. A single-family house cannot be constructed on each lot under current building codes.

</footnote>

In summary, at this time the selected alternative for each property, as described above, is believed to provide the best balance of trade-offs among the alternatives with respect to the criteria used to evaluate remedies. Based on the information available at this time, therefore, EPA believes that the selected alternatives will be protective, will attain ARARs, will be cost-effective, and will utilize permanent solutions and alternative treatment technologies or resource recovery technologies to the maximum extent practicable. The selected alternatives do not satisfy the preference for treatment as a principal element since the radiation-contaminated materials will be landfilled at a permitted offsite disposal facility because the various radioactive elements cannot be destroyed.

EPA selected Alternative 2, contamination removal and building repair, for 346 Owen Avenue over Alternative 3 principally because the contamination within the structure at this property is found at levels and locations which permit complete remediation with minimal impact to the building itself. EPA cannot justify complete demolition of the structure nor permanent off-site relocation under these circumstances.

Factors which led EPA to select Alternative 3 (which offers, in most instances, either Government-

funded rebuilding of the structures (Option A); off-site relocation (Option B); or building repair in accordance with Alternative 2 (Option C)) for the remainder of the properties include implementability and public acceptance. While structures on several properties may be repaired without demolishing the entire structure, the work required to remove contamination in many of these cases involves, among other tasks, suspension of the structures and excavation of foundations. For these properties, the difference in implementability between complex repair work and complete demolition is insignificant. The added management oversight required to rebuild the structures over that required to provide off-site relocations was weighed against the almost universal desire by property owners to have a choice in deciding whether to remain on their property (once cleaned) and by neighboring residents and community officials concerned about empty lots in the affected neighborhoods (traditional relocation performed under the Uniform Relocation Assistance and Real Property Acquisition Policies Act (42 U.S.C. Chapter 61) would result in off-site relocations and clean, empty parcels which would be turned over to the Commonwealth of Pennsylvania). On balance, EPA determined that both sets of concerns could be best addressed by allowing each affected property owner to choose between the three options offered in Alternative 3.

#### 11. PERFORMANCE STANDARDS

Performance of the selected remedial actions will result in removal and disposal of all Site-related radiation contamination currently in the buildings at all of the properties subject to this Record of Decision. All Site-related soil contamination at residential and potentially residential properties will be removed so that no sample of soils remaining following the remedial action will contain radium 226 concentrations exceeding 5.0 pCi/g. Site-related contamination in soils on public-use properties that EPA determines are unlikely to become residential (e.g., streets and railroad rights-of-way) will be remediated if radium 226 concentrations in those soils exceed 5 pCi/g in the top 15 centimeters of soil and/or 15 pCi/g in subsoils, averaged over 100 square meters, per the requirements of 40 C.F.R. [Para] 192.12(a). In those public-use areas which are found to exceed the standards set forth at 40 C.F.R. [Para] 192(a), soil remediation will be accomplished such that no sample of soil remaining following the remediation will contain radium 226 concentrations exceeding the 5.0 pCi/g standard set in this ROD for residential soils. Institutional controls to restrict the future construction of residential dwellings and/or the depth of building footings and foundations will be implemented if EPA is unable to reduce contamination to the 5 pCi/g level at these non-residential properties.

The remediation of soil areas will include backfilling of excavations, where appropriate, with clean soil and revegetation to inhibit soil erosion. Public use areas such as streets, sidewalks, and railroads will be restored to the uses that those properties served prior to the remedial action.

#### 12. STATUTORY DETERMINATIONS

This remedy satisfies the remedy selection requirements of CERCLA and the NCP. The remedy is expected to be protective of public health and welfare and the environment, complies with ARARS, is cost-effective, and utilizes permanent solutions and alternative treatment technologies to the maximum extent practicable. Because contaminated materials will be transported offsite for landfilling at permitted facilities, the remedy does not meet the statutory preference for treatment as a principal element of the remedy. The following is a discussion of how the selected remedial actions address these statutory requirements:

##### Protection of Public Health and Welfare and the Environment

The selected remedial actions protect public health and welfare and the environment by cleaning the properties subject to this Record of Decision such that levels of radioactive substances will not exceed health-based criteria.

##### Compliance with Applicable or Relevant and Appropriate Requirements

These standards are considered applicable to the remedial actions:

All asbestos removal activities during the remedial actions will comply with 40 C.F.R. [Para] 61.145 (National Emission Standards for Asbestos; Standard for Demolition and Renovation) and 25 Pa. Code Chapter 24 (National Emission Standards for Hazardous Air Pollutants) (limited to adoption of standards set forth in 40 C.F.R. [Para] 61.145). In addition, all excavation, dismantlement, demolition, and construction activities will comply with 25 Pa. Code [Para][Para] 123.1 and 123.3 (Prohibition of Certain Fugitive Emissions) (Fugitive Particulate Matter); 25 Pa. Code [Para] 123.31 (emission of malodorous air contaminants); 25 Pa. Code [Para] 123.41 (emission of visible air contaminants); 25 Pa. Code [Para] 219.21(a)(3) (Maximum Permissible Levels of Radiation from External Sources).

These standards are considered relevant and appropriate to the remedial actions:

Contaminated soils on public use properties will be remediated if radium 226 contamination in those soils equals or exceeds the action levels set forth in 40 C.F.R. Part 192, Subpart B (Standards for Cleanup of Land and Buildings contaminated with Residual Materials from Inactive Uranium Processing Sites). Radiation exposures will comply with the provisions of 10 C.F.R. Part 20, Subpart D (Radiation Dose Limits for Individual Members of the Public).

#### Cost Effectiveness

Once protectiveness has been established, cost effectiveness is determined by comparing the costs of the alternatives being considered with the overall effectiveness of each alternative to determine whether an alternative represents a reasonable value for the money to be spent. The remedies selected are judged to afford overall effectiveness proportional to their costs such that the remedies represent good values. When the relationship between the costs and overall effectiveness of the selected remedies is compared to the costs and effectiveness of the other alternatives, the selected remedies are judged to be more cost effective.

#### Utilization of Permanent Solutions and Alternative Treatment Technologies to the Maximum Extent Practicable

EPA has determined that the selected remedial actions represent the maximum extent to which permanent solutions and alternative treatment technologies can be utilized while providing the best balance among the other evaluation criteria at this time. The remedies provide the best balance in terms of the nine evaluation criteria.

### 13. EXPLANATION OF SIGNIFICANT CHANGES

#### A. The Proposed Remedial Action Plan and Revised Proposed Remedial Action Plan.

On July 1, 1993, EPA issued a Proposed Remedial Action Plan describing five alternatives considered as possible remedial actions for twenty-one of the parcels subject to this Record of Decision. The July 1, 1993 Plan also designated EPA's preferred alternative for each of the properties. In the July 1, 1993 Plan, EPA expressed its preference to remove contamination and repair the affected structure at only one of the properties, dismantle contaminated structures and perform off-site relocations at sixteen properties, and dismantle an additional four contaminated structures without performing relocation or replacing the structures. Numerous comments from citizens and local officials requested that EPA consider remedial options that would permit affected residents to return to newly constructed homes on their original properties. Comments additionally sought relief for owners of contaminated commercial structures, who would not receive a replacement buildings under the URA. EPA also obtained information relating to repair options not previously considered. These options enabled the Agency to consider building repairs for a larger number of affected structures.

Following consideration of the responses to the July 1, 1993 Proposed Remedial Action Plan, and of the above-described information, EPA issued, on March 2, 1994, a Revised Proposed Remedial Action Plan for the twenty-two parcels which are subject to this Record of Decision. In the March 2, 1994 Revised Plan, EPA expanded the number of structures for which repair is practicable to five, offered most property owners the option of off-site relocation under the URA or "on-site" relocation into newly constructed homes to be built once the lots are cleaned, and provided for replacement of commercial structures that would be dismantled.

#### B. Changes Following Issuance of the Revised Proposed Remedial Action Plan.

In the March 2, 1994 Revised Proposed Remedial Action Plan, EPA expressed a preference for, among other things, the removal of contaminated portions of the structures located at 151 Lexington Avenue, 211 Penn Boulevard, 10 East Plumstead Avenue, and 6 East Plumstead Avenue, and the repair of those structures as described for Alternative 2. After further consideration, EPA announced at a public meeting on March 15, 1994 that it would offer the owners of those properties the choice of options available under Alternative 3. Subsequent to this announcement, EPA issued a letter, dated March 23, 1994, to the owner of each property proposed for remedial action, the municipalities, and the Commonwealth of Pennsylvania explaining the change. Additionally, an announcement of the change was published in the PHILADELPHIA INQUIRER, the NEWS OF DELAWARE COUNTY, and the DELAWARE COUNTY DAILY TIMES on March 30, 1994.

FIGURE 1

<Figure>

#### RESPONSIVENESS SUMMARY

On July 1, 1993, EPA issued a Proposed Remedial Action Plan describing five alternatives considered as possible remedial actions for twenty-one of the parcels subject to this Record of Decision. The July 1, 1993

Plan also designated EPA's preferred alternative for each of the properties. EPA requested comments on the Plan and opened a public comment period. In response to that Plan, EPA received numerous letters from citizens and public officials requesting that EPA reconsider its preferred alternatives for several of the parcels. In addition, EPA gathered additional information useful in the evaluation of remedial alternatives for the properties. Following consideration of the responses to the first Proposed Remedial Action Plan, and of the above-described information, EPA issued, on March 2, 1994, a Revised Proposed Remedial Action Plan (Revised PRAP) for the twenty-two parcels which are subject to this Record of Decision and opened a public comment period on the new plan. Notice of a minor modification to the Revised PRAP was published in local newspapers on March 30, 1994. A brief discussion of the differences between the July 1, 1993 Proposed Remedial Action Plan and the March 2, 1994 Revised PRAP is found in Section 13 of the ROD.

In compliance with Sections 113(k) and 117 of CERCLA, the Revised PRAP and the Administrative Record file were placed for public inspection at the Lansdowne Borough Library, Lansdowne, Delaware County, Pennsylvania. An announcement of the availability of these documents was placed in three locally-available newspapers on March 2, 1994 and a Public Comment Period was held from March 2, 1994 to April 30, 1994. Additionally, a Public Meeting was held on March 15, 1994 at the Beverly Hills Middle School, Upper Darby Township, Pennsylvania, and individual copies of the Revised PRAP were distributed to the individual property owners whose properties were the subject of the Revised PRAP, to the affected municipalities, and to the Pennsylvania Department of Environmental Resources.

EPA received ten letters responding to the Revised PRAP during the public comment period, and one set of tax revenue calculations was received by EPA from a citizen during the March 5, 1994 public meeting. The following is a summary of the significant comments to the Revised PRAP and EPA's responses to those comments:

Comment: A commentator suggested that the houses that are proposed for remedial action and that are currently unoccupied should be the first to be remediated.

Response: The chronology for remedial actions at the various properties will be determined by several factors including the actual endangerment to any residents still residing at the properties, the remedial action option selected by the individual property owners, the schedule designated by the selected remedial action contractor(s), and the manpower needed and available to perform the remedial action. The sequence of work will be set during pre-construction meetings among EPA, the U.S. Army Corps of Engineers and the remedial action contractor.

Comment: A request was made that EPA rebuild houses on all lots in the Borough of Lansdowne, even in those circumstances in which the property owner(s) have chosen off-site relocation.

Response: EPA will rebuild houses only in those instances in which the owner(s) chose onsite relocation. EPA cannot expend Superfund monies for purposes unrelated to the implementation of the remedial action. The Commonwealth of Pennsylvania will take title to those properties on which replacement structures will not be built under this remedial action.

Comment: A request was made that EPA rebuild houses which will closely duplicate the pre-existing structures on the decontaminated lots.

Response: EPA intends to rebuild the houses, in those instances where the owners choose onsite relocation, such that those houses will have, to the extent practicable, the same architectural design and "curb appeal" as the pre-existing structures.

Comment: A request was made that EPA conduct further testing for radiation-contaminated houses in the Borough of Lansdowne.

Response: EPA believes that all Site-related soil and structural contamination within a two-mile radius of the former Cummings facility (Austin Avenue at South Union Avenue) has been discovered by EPA. EPA believes that the assessment of the two-mile radius area (comprising approximately 12.5 square miles) was a very reasonable and practicable approach to identifying the extent of contamination. EPA is confident that all substantial soil and structural contamination from the former Cummings operation has been located. EPA has recently confirmed that groundwater in the vicinity of the former Cummings facility is radiologically contaminated and intends to investigate this contamination. Such investigation, and any response actions which may be performed following such investigation, are not part of the remedial actions selected in this ROD.

Comment: A request was made that EPA provide some form of certification to the owners of the properties specifying that the properties are free of radiation contamination following the remedial action.

Response: The remedial action contractor will submit a report for each of the properties. That report will

indicate that the remedial action requirements designated in the ROD have been accomplished. The report(s) will be available to the property owners.

Comment: A request was made that EPA provide monthly reports to the Borough of Lansdowne to inform the Borough of all actions that are being considered or being undertaken by EPA.

Response: EPA intends to keep municipal and state officials fully advised of Site-related activities.

Comment: A suggestion was made that a non-profit corporation headed by residents be funded by EPA to perform the rebuilding of those houses for which the owners choose the onsite relocation option.

Response: The on-Site replacement of structures will be performed by EPA through the U.S. Army Corps of Engineers as part of a remedial action for which EPA is responsible. Close coordination between EPA, the Corps, and the affected homeowners during the design phase will ensure that replacement structures preserve the original character of the structures and surrounding neighborhoods to the maximum extent practicable. Architects and building contractors will be selected through appropriate government procurement practices which will assure that EPA's remedial action requirements are achieved. Property owners will have ample opportunity to participate in decisions affecting replacement of their homes. While EPA may not, as the commentor points out, have expertise in home building, the Agency will secure that expertise through existing contracting mechanisms and will not delegate authority to execute any portion of the remedial action to a non-profit corporation.

Comment: A commentor requested that local ordinances, including municipal building codes, should be listed as applicable or relevant and appropriate requirements (ARARs).

Response: Municipal ordinances, including building codes, are not ARARs as defined under CERCLA because they are neither Federal nor State environmental requirements and, as such, are not listed as ARARs in the ROD. However, construction conducted by EPA will conform to municipal building codes to the maximum extent practicable.

Comment: A commentor expressed concern that residents who are temporarily relocated for the purposes of the remedial action will not be adequately provided for.

Response: All temporary relocations will be conducted pursuant to the provisions of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, 42 U.S.C. [Para] 4601 et seq., which provides for, among other things, temporary housing of displaced persons. The temporary relocations will be conducted through the U.S. Army Corps of Engineers.

Comment: A commentor suggested that, for any residential property for which the repair option is selected, EPA should repair not only those portions of the property that are remediated to remove radiation contamination, but also any uncontaminated areas of the house(s) on which maintenance was deferred by the owner(s).

Response: EPA will repair only those portions of each property that must be destroyed, under the repair option, to remediate the contaminated portions of each property. EPA may use Superfund monies to repair damage resulting from contamination but may not make other repairs to the properties.

Comment: A commentor expressed concern that the entire amount of a mortgage might become due and payable by the owner(s) in the event that a house is dismantled for the purposes of a remedial action.

Response: The U.S. Army Corps of Engineers has considered this matter and will work with the mortgagees to assure them that the loss of collateral (the houses) is temporary and that, in the cases of onsite relocation, new dwellings will be rebuilt to continue security for the mortgages.

Comment: A commentor expressed that, in those instances where onsite relocation is chosen, that EPA should state, at the completion of the remedial action for each property, that the property in question is no longer considered by EPA to be part of the Site.

Response: Each property which undergoes remedial action will remain on the Superfund National Priorities List (the "NPL") until deleted from that listing through the formal process required pursuant to the NCP.

Comment: A commentor requested that EPA state in the ROD that the remedial action selected for the Site is the only action contemplated to address contamination at the Site.

Response: The remedial actions selected in the ROD are the sole remedial actions that will be implemented at the residential properties identified in the ROD. EPA does not expect that uranium-contaminated ground water recently discovered in the immediate vicinity of the former Cummings facility affects any of these

residential properties. Remedial actions, if any, deemed appropriate by EPA to address this ground water contamination would be announced in a subsequent Record of Decision.

Comment: A commentor requested an explanation of how the present value shown in the Revised PRAP for 133 Austin Avenue was determined and also requested that EPA consider increasing that value.

Response: The present value of the property at 133 Austin Avenue was derived by adding the estimated market value of the property (uncontaminated) plus a reasonable contingency amount which might be necessary in order to provide a comparable replacement property. All real estate transactions relative to this property will be conducted by the U.S. Army Corps of Engineers using the provisions of the URA.

Comment: A commentor suggested that either the Agency for Toxic Substances and Disease Registry (ATSDR) or EPA should make health surveillance available to the residents of the Site.

Response: ATSDR is authorized to implement medical surveillances pursuant to section 104(i)(9) of CERCLA. Such programs are initiated where ATSDR determines that there is a significant increased risk of adverse health effects from exposure to hazardous substances released from a site. ATSDR has not made such a determination under section 104(i)(9) of CERCLA and, therefore, no surveillance is currently planned for this site.

Comment: A commentor commended EPA for its proposal to rebuild houses.

Response: EPA has endeavored to be responsive to the community's concerns throughout the remedy selection process. Onsite replacement structures will be provided in those instances in which the property owners choose onsite relocation. No structures will be rebuilt on those properties for which the owners choose offsite relocation.

Comment: Homeowners insisted that their houses not necessarily be repaired as provided in the March 2, 1994 Revised PRAP, but that they (the homeowners) be afforded a choice among repair of their dwelling, onsite relocation or offsite relocation.

Response: EPA made a change to the Revised PRAP such that the owners of four of the properties which had been proposed for repair in the original version of the Revised PRAP would be given the option of choosing either repair, onsite relocation, or offsite relocation.

Comment: A request was made for an extension of the 30-day public comment period for the Revised PRAP.

Response: EPA extended the public comment for an additional 30 days.

STATE CONCURRENCE LETTER

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL RESOURCES  
Lee Park, Suite 6010  
555 North Lane  
Conshohocken, PA 19428-2233  
June 27, 1994

(610) 832-6212

Southeast Regional Office

Mr. Peter H. Kostmayer  
Regional Administrator  
U.S. EPA - Region III  
841 Chestnut St Building  
Philadelphia, PA 19107

Re: Austin Ave NPL Site - Record of Decision Concurrence

Dear Mr. Kostmayer,

The Record of Decision received by the Department on June 15, 1994 has been reviewed.

The major components of the selected remedy include:

- @ Removal of contamination and repair of structures at 346 Owen Avenue and 42 and 44 South Union Avenue.
- @ Eighteen additional properties will have contaminated structural components removed or will be completely dismantled. Tenants will be relocated, owners will choose repair (if feasible), replacement of structure, or permanent relocation.
- @ Following remediation the Commonwealth of Pennsylvania will acquire title, or make arrangements for transfer of title to a third party, to those properties in which owners select permanent relocation.
- @ Removal and offsite disposal of radiation-contaminated soils to permitted facilities. Backfilling and revegetation of remediated properties.
- @ Replacement of storage building at 135 Austin Avenue and provision of offsite structure or equivalent to replace the former 133 Austin Avenue.

I hereby concur with the EPA's proposed actions, with the following conditions:

- @ With regard to soil contamination, the completed final remedial action must preclude any degradation of ground water through leaching or other infiltration of hazardous substances or contaminants addressed by the ROD. The Department understands that the cleanup standards for soils contained in the ROD will satisfy this condition.
- @ The Department will be given the opportunity to concur with decisions related to the Remedial Design and the Remedial Action to ensure compliance with DER cleanup ARARs and design specific ARARs.
- @ The Department's design standards are ARARs pursuant to CERCLA Section 121, 42 U.S.C. [Para]9621, and the Department maintains the right to enforce those design standards.
- @ This concurrence with the selected remedial action is not intended to provide any assurances pursuant to CERCLA Section 104(c)(3), 42 U.S.C. [Para]9604(c)(3).

Additionally, the Department understands that ground water contamination has been discovered at the site and that any plan to address this ground water would be developed in the future.

Thank you for the opportunity to concur with this EPA Record of Decision. If you have any questions regarding this matter, please do not hesitate to contact me.

Sincerely,

James W. Rue  
Regional Director

cc: Mr. Beitler  
Mr. Orwan  
Mr. Hartzell  
Mr. Becker  
Mr. Danyliw  
Mr. Sheehan  
Mr. Ung  
Ms. Tremont  
Mr. Hess  
File



ADMINISTRATIVE RECORD INDEX

AUSTIN AVENUE RADIATION

ADMINISTRATIVE RECORD FILE<Footnote>\* Administrative Record File available  
6/14/93, updated 6/29/93, 3/2/94, and 6/29/94.</footnote>  
INDEX OF DOCUMENTS

II. REMEDIAL ENFORCEMENT PLANNING

1. Excerpts from "Final Potentially Responsible Party Search Report/Austin Avenue Radiation Site," 7/92. P. 200001-200005.
2. Letter to Mr. Joseph M. Mince, Mince, Gold & Katcher, from Mr. Andrew J. Goldman, U.S. EPA, re: Whether or not fees for in-house consulting engineers would be covered by Technical Assistance Grant (TAG) funding, 11/25/92. P. 200006-200015.

III. REMEDIAL RESPONSE PLANNING

3723 Huey Avenue

1. 3723 Huey Avenue Basement and First Floor Plans, prepared by Roy F. Weston, Inc., 7/2/92. P. 300001-300006. The following are attached:
  - a) Second & Third Floor Plans;
  - b) North & South Cross Sections;
  - c) East & West Cross Sections;
  - d) North & South Exterior Elevations;
  - e) East & West Exterior Elevations.
2. Cost Development Study, 3723 Huey Avenue, 7/24/92. P. 300007-300021.
3. Report: EPA - Lansdowne Project, Phase II Soil Characterization Project for 3723 Huey Avenue, prepared by John O. Hamm, 8/10/92. P. 300022-300053.
4. Memorandum to Mr. Walter Lee, U.S. EPA, from Mr. John Hamm, re: Addendum to the Soil Characterization Report, 8/22/92. P. 300054-300057. The addendum is attached.
5. Report: EPA - Lansdowne Project, Characterization Report for 3723 Huey Avenue, prepared by Darrell J. Turner, (undated). P. 300058-300139.

42 South Union Avenue

6. Report: EPA - Lansdowne Project, Characterization Report for 42 S. Union Avenue, prepared by John O. Hamm, 6/3/92. P. 300140-300161.
7. 42 South Union Avenue, Basement and First Floor Plans, prepared by Roy F. Weston, Inc., 7/20/92. P. 300162-300165. The Bar, Garage and Apartment Addition Plan; North and East Elevations; and South and West Elevations are attached.
8. Cost Development Study, 42 S. Union Avenue, 9/4/92. P. 300166-300181.
9. Handwritten memorandum to file from Mr. V. Janosik, U.S. EPA, re: No soil around 42 S. Union Avenue constituting the reason why no Soil Characterization Report was compiled, 10/14/92. P. 300182-300182.
10. Memorandum to file from Mr. Victor J. Janosik, U.S. EPA, re: Contamination at 42 S. Union Avenue, 1/16/93. P. 300183-300183.

500 Harper Avenue

11. 500 Harper Avenue, Basement, First and Second Floor Plans, prepared by Roy F. Weston, Inc., 5/15/92. P. 300184-300187. The 3rd Floor Plan; North and East Elevations; and South and West Elevations are attached.

12. Report: EPA - Lansdowne Project, Phase II Soil Characterization Report for 500 Harper Avenue, prepared by John O. Hamm, 8/18/92. P. 300188-300222.
  13. Cost Development Study, 500 Harper Avenue, 8/31/92. P. 300223-300237.
  14. Report: EPA - Lansdowne Project, Characterization Report for 500 Harper Avenue, prepared by Darrell J. Turner, (undated). P. 300238-300302.
- 151 Lexington Avenue
15. 151 Lexington Avenue, Basement & 1st Floor Plans, prepared by Roy F. Weston, Inc., 5/18/92. P. 300303-300306. The 2nd Floor Plan & Sections; North and South Elevations; and East and West Elevations are attached.
  16. Cost Development Study, 151 Lexington Avenue, 6/26/92. P. 300307-300321.
  17. Report: EPA - Lansdowne Project, Phase II Soil Characterization Report for 151 Lexington Avenue, prepared by John O. Hamm, 8/31/92. P. 300322-300373.
  18. Memorandum to Mr. Walter Lee, U.S. EPA, from Mr. John Hamm, re: Addendum to the Soil Characterization Report, 9/10/92. P. 300374-300378. The addendum is attached.
  19. Memorandum to Mr. Walter Lee, U.S. EPA, from Mr. John Hamm, re: Addendum to the Soil Characterization Report, 9/10/92. P. 300379-300382. The addendum is attached.
  20. Report: EPA - Lansdowne Project, Characterization Report for 151 Lexington Avenue, prepared by Darrell J. Turner, (undated). P. 300383-300435.

6 Plumstead Avenue

21. Report: Draft EPA - Lansdowne Project, Characterization Report for 6 Plumstead Avenue, prepared by Darrell J. Turner, 5/7/92. P. 300436-300476.
22. 6 Plumstead Ave., Basement and Partial Site Plan, prepared by Roy F. Weston, Inc., 6/24/92. P. 300477-300481. The following are attached:
  - a) First and Second Floor Plans;
  - b) Third Floor Plan;
  - c) North and East Elevations;
  - d) South and West Elevations.
23. Cost Development Study, 6 Plumstead Avenue, 7/17/92. P. 300482-300496.
24. Report: EPA - Lansdowne Project, Phase II Soil Characterization Report for 6 E. Plumstead Avenue, prepared by John O. Hamm, 8/19/92. P. 300497-300538.

10 Plumstead Avenue

25. Report: EPA - Lansdowne Project, Characterization Report for 10 Plumstead Avenue, prepared by Darrell J. Turner, 5/20/92. P. 300539-300609.
26. 10 Plumstead Avenue, Basement and 1st Floor Plans, prepared by Roy F. Weston, Inc., 7/28/92. P. 300610-300613. The 2nd and 3rd Floor Plans; Basement Sections and Exterior Elevations; and North and South Exterior Elevations are attached.
27. Cost Development Study, 10 Plumstead Avenue, 8/7/92. P. 300614-300628.
28. Report: EPA - Lansdowne Project, Phase II, Soil Characterization

Report for 10 E. Plumstead Avenue, prepared by John O. Hamm, 9/1/92.  
P. 300629-300657.

#### 16 Plumstead Avenue

29. Report: EPA - Lansdowne Project, Characterization Report for 16 Plumstead Avenue, prepared by Darrell J. Turner, 5/12/92. P. 300658-300682.
30. 16 Plumstead Avenue, Basement and First Floor Plans, prepared by Roy F. Weston, Inc., 7/15/92. P. 300683-300686. The Second and Third Floor Plans; North and South Elevations; and South and West Elevations are attached.
31. Cost Development Study, 16 Plumstead Avenue, 7/24/92. P. 300687-300703.
32. Report: EPA - Lansdowne Project, Phase II Soil Characterization Report for 16 E. Plumstead Avenue, prepared by John O. Hamm, 8/19/92. P. 300704-300733.

#### 237 North Lansdowne Avenue

33. Report: Draft EPA - Lansdowne Project, Characterization Report for 237 N. Lansdowne Avenue, prepared by Darrell J. Turner, 5/8/92. P. 300734-300768.
34. 237 N. Lansdowne Ave., Site and Basement Plans, prepared by Roy F. Weston, Inc., 7/9/92. P. 300769-300775. The following are attached:
  - a) 1st and 2nd Floor Plans;
  - b) 3rd Floor Plan & Cross Sections;
  - c) Exterior Elevation, North;
  - d) Exterior Elevation, South;
  - e) Exterior Elevation, East;
  - f) Exterior Elevation, West;

35. Cost Development Study, 237 North Lansdowne Avenue, 7/24/92. P. 300776-300792.
36. Report: EPA - Lansdowne Project, Phase II Soil Characterization Report for 237 N. Lansdowne Avenue, prepared by John O. Hamm, 9/11/92. P. 300793-300839.

#### 216 Wayne Avenue

37. Report: Draft EPA - Lansdowne Project, Characterization Report for 216 Wayne Avenue, prepared by Darrell J. Turner, 5/12/92. P. 300840-300893.
38. Report: EPA - Lansdowne Project, Phase II Soil Characterization Report for 216 Wayne Avenue, prepared by John O. Hamm, 7/22/92. P. 300894-300929.
39. Memorandum to Mr. Walter Lee, U.S. EPA, from Mr. John Hamm, re: Addendum to the Soil Characterization Report, 7/23/92. P. 300930-300933. The addendum is attached.
40. 216 Wayne Avenue, Basement and First Floor Plans, prepared by Roy F. Weston, Inc., 7/27/92. P. 300934-300937. The Second Floor Plan and Plot Plan; North and East Elevations; and South and West Elevations are attached.
41. Cost Development Study, 216 Wayne Avenue, 8/3/92. P. 300938-300954.

#### 218 Wayne Avenue

42. 218 Wayne Avenue, Basement and First Floor Plans, prepared by Roy F. Weston, Inc., 6/16/92. P. 300955-300958. The Second Floor Plan; North & South Elevations; and East & West Elevations are attached.
43. Cost Development Study, 218 Wayne Avenue, 7/2/92. P. 300959-300975.

44. Report: Draft EPA - Lansdowne Project, Phase II Soil Characterization Report for 218 Wayne Avenue, prepared by John O. Hamm, 7/21/92. P. 300976-301020.

45. Report: EPA Lansdowne Project, Characterization Report for 218 Wayne Avenue, prepared by Darrell J. Turner, (undated). P. 301021-301071.

#### 219 Wayne Avenue

46. Report: Draft EPA - Lansdowne Project, Characterization Report for 219 Wayne Avenue, prepared by Darrell J. Turner, 5/8/92. P. 301072-301127.

47. 219 Wayne Avenue, Basement and First Floor Plans, prepared by Roy F. Weston, Inc., 7/2/92. P. 301128-301132. The following are attached:

- a) Second & Third Floor Plans;
- b) North & South Cross Sections;
- c) North & South Exterior Elevations;
- d) East & West Exterior Elevations.

48. Cost Development Study, 219 Wayne Avenue, 7/2/92. P. 301133-301149.

49. Report: EPA - Lansdowne Project, Phase II Soil Characterization Report for 219 Wayne Avenue, prepared by John O. Hamm, 8/4/92. P. 301150-301190.

#### 310 Shadeland Avenue

50. Report: Draft EPA - Lansdowne Project, Phase II Soil Characterization Report for 310 Shadeland Avenue, prepared by John O. Hamm, 7/29/92. P. 301191-301215.

51. 310 Shadeland Avenue, Basement and First Floor Plans, prepared by Roy F. Weston, Inc., 8/14/92. P. 301216-301220. The following are attached:

- a) Second and Third Floor Plans;
- b) East and West Elevations;
- c) Exterior Elevation North;
- d) Exterior Elevation South.

52. Memorandum to Mr. Walter Lee, U.S. EPA, from Mr. John Hamm, re: Addendum to the Soil Characterization Report, 9/10/92. P. 301221-301224. The addendum is attached.

53. Cost Development Study, 310 Shadeland Avenue, 10/5/92. P. 301225-301241.

54. Report: EPA - Lansdowne Project Characterization Report for 310 Shadeland, prepared by Darrell J. Turner, (undated). P. 301242-301324.

#### 346 Owen Avenue

55. 346 Owen Avenue, Basement and First Floor Plans, prepared by Roy F. Weston, Inc., 6/16/92. P. 301325-301328. The Second Floor and Attic Plans; North and South Elevations; and South and West Elevations are attached.

56. Report: Draft EPA - Lansdowne Project, Phase II Soil Characterization Report for 346 Owen Avenue, prepared by John O. Hamm, 7/8/92. P. 301329-301365.

57. Cost Development Study, 346 Owen Avenue, 7/26/92. P. 301366-301380.

58. Report: EPA - Lansdowne Project, Characterization Report for 346 Owen Avenue, prepared by Darrell J. Turner, (undated). P. 301381-301431.

#### 617, 619, 621 and 623 Pine Street

59. Report: Draft EPA-Lansdowne Project, Phase II Soil Characterization Report for 617, 619, 621, and 623 Pine Street, prepared by John O.

60. 617 Pine Street, Basement, First Floor and Second Floor IV Plans, prepared by Roy F. Weston, Inc., 8/3/92. P. 301454-301456. The North and East Elevations and South and West Elevations are attached.
61. 619 Pine Street, Basement, First Floor and Second Floor Plans, prepared by Roy F. Weston, Inc., 8/5/92. P. 301457-301459. The North and East Elevations and South and West Elevations are attached.
62. 621 Pine Street, Basement, First Floor and Second Floor Plans, prepared by Roy F. Weston, Inc., 8/6/92. P. 301460-301462. The North and East Elevations and South and West Elevations are attached.
63. Cost Development Study, 617 Pine Street, 8/7/92. P. 301463-301477.
64. 623 Pine Street, Basement, First Floor and Second Floor Plans, prepared by Roy F. Weston, Inc., 8/13/92. P. 301478-301480. The North and East Elevations and South and West Elevations are attached.
65. Cost Development Study, 619, Pine Street, 8/14/92. P. 301481-301495.
66. Cost Development Study, 621, Pine Street, 8/14/92. P. 301496-301510.
67. Cost Development Study, 623, Pine Street, 1/21/92. P. 301511-301525.
68. Report: EPA - Lansdowne Project, Characterization Report for 617, 619, 621, 623 Pine Street, prepared by Darrell J. Turner, (undated). P. 301526-301621.

34 Lewis Avenue

69. 34 Lewis Avenue, Basement and First Floor Plans, prepared by Roy F. Weston, Inc., 6/19/92. P. 301622-301625. The Second Floor Plan; North & South Elevations; and West & East Elevations are attached.
70. Cost Development Study, 34 Lewis Avenue, 7/2/92. P. 301626-301640.
71. Report: EPA - Lansdowne Project, Phase II Soil Characterization Report for 34 Lewis Avenue, prepared by John O. Hamm, 9/10/92. P. 301641-301698.
72. Memorandum to Mr. Walter Lee, U.S. EPA, from Mr. John Hamm, re: Addendum to the Soil Characterization Report, 9/11/92. P. 301699-301707. The addendum is attached.
73. Report: EPA - Lansdowne Project, Characterization Report for 34 Lewis Avenue, prepared by Darrell J. Turner, (undated). P. 301708-301744.

64 South Clifton Avenue

74. 64 South Clifton Avenue, Basement Plan and Elevations, prepared by Roy F. Weston, Inc., 5/4/92. P. 301745-301746. The Wall Elevations are attached.
75. Memorandum to Mr. Walter Lee, U.S. EPA, from Mr. James S. Turkel, U.S. Department of the Army, re: Value of the house at 64 South Clifton Avenue, 6/11/92. P. 301747-301747.
76. Cost Development Study, 64 South Clifton Avenue, 7/9/92. P. 301748-301764.
77. Report: Draft EPA - Lansdowne Project, Phase II Soil Characterization Report for 64 S. Clifton Avenue, prepared by John O. Hamm, 7/15/92. P. 301765-301794.
78. Memorandum to Mr. Walter Lee, U.S. EPA, from Mr. John Hamm, re: Addendum to the Soil Characterization Report, 9/11/92. P. 301795-301799. The addendum is attached.

79. Report: EPA- Lansdowne Project, Characterization Report for 64 South Clifton Avenue, prepared by Darrell J. Turner, (undated). P. 301800-301842.

211 Penn Boulevard

80. 211 Penn Boulevard, 1st & 2nd Floor Plans, prepared by Roy F. Weston, Inc., 5/4/92. P. 301843-301845. The 2nd Fl. Plan & Sections and Exterior Elevations are attached.

81. Cost Development Study, 211 Penn Boulevard, 6/12/92. P. 301846-301860.

82. Report: EPA-Lansdowne Project, Phase II Soil Characterization Report for 211 Penn Boulevard, prepared by John O. Hamm, 8/4/92. P. 301861-301900.

83. Report: EPA-Lansdowne Project, Characterization Report for 211 Penn Boulevard, prepared by Darrell J. Turner, (undated). P. 301901-301942.

#### Additional Information

84. Memorandum to Mr. Walter Graham, U.S. EPA. from Mr. Victor J. Janosik, U.S. EPA, re: Soil cleanup criteria, 11/8/89. P. 301943-301944.

85. EPA Lansdowne Project, Lansdowne, Pennsylvania, Property Descriptions, prepared by Mr. William Belanger, U.S. EPA, 1/7/92. P. 301945-301951.

86. Public endangerment summary entitled "Inhalation Limit for Radium Tailings at the Austin Avenue Radiation Site to Achieve 100 MREM Annual Dose to Members of the General Population," prepared by Mr. Bill Belanger, 5/13/92. P. 301952-301957.

87. Memorandum to Mr. Walter Lee, U.S. EPA, from Mr. G.R. Boggs, re: Value estimates for properties at the site, 7/2/92. P. 301958-301959. A table of land and structure values and total relocation costs for properties at the site is attached.

88. Report: EPA-Lansdowne Project, Phase II Soil Characterization, Background Determination for Lansdowne and Vicinity, prepared by John O. Hamm, 6/19/92. P. 301960-301983.

89. Memorandum to Ms. Leanne Nurse, U.S. EPA, from Ms. Felicia F. Dailey, Agency for Toxic Substances and Disease Registry, (ATSDR), re: A professional health education presentation entitled "Health Effects of Low-Level Radiation," 9/28/92. P. 301984-302024. The manual given to each participant of the presentation is attached.

90. Memorandum to Mr. Abe Ferdas, U.S. EPA, from Mr. Walter Lee, U.S. EPA, re: Recommendations for future treatment of the properties comprising the site, 10/6/92. P. 302025-302031.

91. Letter to Ms. Donna McCartney, U.S. EPA, from Mr. Clyde H. Sellers, U.S. Department of the Army, re: Property value information, 10/9/92. P. 302032-302081. The following are attached:

- a) a memorandum regarding transmittal of the real estate planning report and the estimated fee value for properties at the site, dated September 9, 1992;
- b) a memorandum regarding submittal of the Real Estate Planning Report for review and approval, dated June 2, 1992;
- c) a report entitled "Real Estate Planning Report, Austin Avenue Radiation Site, Lansdowne Borough, East Lansdowne Borough, Upper Darby Township, Aldan Borough, and Darby Borough, Delaware County, Pennsylvania;"
- d) a memorandum regarding the fee and easement estate wording to be used in determining fee acquisition, dated September 28, 1992;

- e) the wording for fee estates and easement estates;
  - f) an excerpt from the Gross Appraisal which includes the estimate of each property and separates the value of the land and improvements.
92. Handwritten memorandum to file from Mr. Vic Janosik, U.S. EPA, re: Radionuclides of concern, 10/21/92. P. 302082-302083.
93. Letter to Mr. Donald Becker, PADER, from Mr. Victor J. Janosik, U.S. EPA, re: Possible property acquisitions, 11/2/92. P. 302084-302084.
94. Memorandum to Mr. Vic Janosik, U.S. EPA, from Ms. Dawn A. Ioven, U.S. EPA, re: Quantitative risk assessment, 11/5/92. P. 302085-302088. Table 1, Average Radon Levels and Gamma-Radiation Doses, and Table 2, Elevated Carcinogenic Risks Related to Exposure, are attached.
95. Letter to Mr. Kevin Hess, Pennsylvania Department of Environmental Resources (PADER), from Mr. Victor J. Janosik, U.S. EPA, re: Request for Applicable or Relevant and Appropriate Requirements (ARARs) for the site, 12/11/92. P. 302089-302089.
96. Letter to Mr. Kevin Hess, PADER, from Mr. Victor J. Janosik, U.S. EPA, re: Request for review and comments on the draft Proposed Plan, 1/13/93. P. 302090-302090.
97. Letter to Mr. Victor Janosik, U.S. EPA, from Mr. Kevin J. Hess, PADER, re: Receipt of the draft Proposed Plan and transmittal of the state ARARs for the site, 1/21/93. P. 302091-302113. The following are attached:
- a) potential state ARAR's;
  - b) Attachment 1, Chemical-Specific Requirements;
  - c) Attachment 2, Location-Specific Requirements;
  - d) Attachment 3, Action-Specific Requirements;
  - e) a list of Facilities Approved for the Disposal of Asbestos Containing Waste.
98. Letter to Mr. Victor Janosik, U.S. EPA, from Mr. Kevin J. Hess, PADER, re: Comments on the draft Proposed Plan, 2/12/93. P. 302114-302115.
99. Table, Radiochemistry Results, 2/17/93. P. 302116-302116.
100. Memorandum to Mr. Anthony Dappalone, U.S. EPA, from Mr. Victor J. Janosik, U.S. EPA, re: Soils contaminated with uranium, 2/24/93. P. 302117-302117.
101. Lansdowne Underground Uranium Analysis, prepared by Mr. William Belanger, U.S. EPA, 2/26/93. P. 302118-302127.
102. Sampling location map, 2/26/93. P. 302128-302132. Sampling results are attached.
103. Memorandum to Dr. Walter Lee, U.S. EPA, from Mr. Nathan Glen Adams, Roy F. Weston, Inc., re: Transmittal of general description, contamination extent, zoning compliance, and reconstruction cost information, 3/19/93. P. 302133-302190. The above information for the following properties are attached:
- a) 216 Wayne Avenue;
  - b) 218 Wayne Avenue;
  - c) 219 Wayne Avenue;

- d) 237 North Lansdowne Avenue;
- e) 6 Plumstead Avenue;
- f) 10 Plumstead Avenue;
- g) 16 Plumstead Avenue;
- h) 42 South Union Avenue;
- i) 500 Harper Avenue;
- j) 346 Owen Avenue;
- k) 310 Shadeland Avenue;
- l) 3723 Huey Avenue;
- m) 64 South Clifton Avenue;
- n) 34 Lewis Avenue;
- o) 211 Penn Boulevard;
- p) 151 Lexington Avenue;
- q) 617 and 619 Pine Street;
- r) 621 and 623 Pine Street;
- s) a Summary of initial Replacement Reconstruction and Duplicate Reconstruction Cost(s);
- t) review comments on the supporting data and project requirements;
- u) a Cost Development Study for all properties.

104. Memorandum to Mr. Vic Janosik, U.S. EPA, from Ms. Dawn A. Ioven, U.S. EPA, re: Risk-based radium 226 levels, 4/16/93. P. 302191-302203. The following are attached:

- a) Background Soil Sampling Results;
- b) Determination of Average Background [226]Ra Soil Concentration;
- c) Radiological Characterizations for Parks in the Lansdowne Area;
- d) a memorandum regarding risk-based radon levels, dated March 22, 1993;
- e) a memorandum regarding risk-based radium 226 levels, dated April 14, 1993;
- f) a memorandum regarding indoor radon levels, dated March 18, 1993;
- g) Table 1, Elevated Carcinogenic Risks Related to Theoretical Inhalation Exposure.

105. Letter to Mr. Kevin J. Hess, PADER, from Victor J. Janosik, U.S. EPA, re: Responses to PADER's comments on the draft Proposed Plan, 4/20/93. P. 302204-302208. A letter dated February 12, 1993 regarding PADER's comments on the draft Proposed Plan is attached.

106. Memorandum to file from Mr. Victor J. Janosik, U.S. EPA, re: Radiation contaminated soil at the former W.L. Cummings Chemical Company, 4/20/93. P. 302209-302209.

107. Memorandum to file from Mr. Victor J. Janosik, U.S. EPA, re: Costs for the disposal of contaminated soil, 4/21/93. P. 302210-302210.



108. Memorandum to file from Mr. Victor J. Janosik, U.S. EPA, re: Clean up of soils, 4/26/93. P. 302211-302216.
109. Letter to Mr. Victor J. Janosik, U.S. EPA, from Mr. Kevin J. Hess, PADER, re: Comments and questions on the revised draft Proposed Plan, 5/4/93. P. 302217-302217.
110. Table, Decay Chain of Uranium to Lead, prepared by Dr. Bruce Molholt, (undated). P. 302218-302218.
111. Letter to Mr. Kevin J. Hess, PADER, from Mr. Victor J. Janosik, U.S. EPA, re: Review of the second draft of the Proposed Plan, 6/10/93. P. 202219-302219.
112. Memorandum to file from Mr. Victor J. Janosik, U.S. EPA, re: Summary of a May 12, 1993 meeting to discuss cleanup levels for radium 226 in soils, 6/21/93. P. 302220-302220.
113. Letter to Mr. Kevin Hess, PADER, from Mr. Victor J. Janosik, U.S. EPA, re: The final Proposed Plan, 6/23/93. P. 302221-302221.
114. Proposed Remedial Action Plan, Austin Avenue Radiation Site, Lansdowne Borough, Aldan Borough, East Lansdowne Borough, Darby Borough, and Upper Darby Township, Delaware County, Pennsylvania, (undated). P. 302222-302243.
115. Memorandum to Mr. Victor J. Janosik, U.S. EPA, from Mr. John Sykes, III, Austin Avenue Radiation Site Health & Safety/Radiation Safety Office, re: Results of off-site sample cores taken to detect potential off-site migration of radioactive material, 6/23/93. P. 302244-302247. Sample results are attached.
116. Memorandum to file from Mr. Victor J. Janosik, U.S. EPA, re: Summary of a June 28, 1993 meeting with the owners of affected properties, 7/6/93. P. 302248-302248.
117. List of properties affected by the site with a cost estimate assessment for remedial action, 7/19/93. P. 302249-302249.
118. Memorandum to Mr. Vic Janosik, U.S. EPA, from Mr. Bill Bellanger, U.S. EPA, re: Background information on soil radium activity, 7/21/93. P. 302250-302253. Two tables showing soil activity are attached.
119. Memorandum to file from Mr. Victor J. Janosik, U.S. EPA, re: Summary of a trip to the Montclair/Glenridge Radiation Site near Newark, New Jersey to compare remedial action work at that site with the Austin Avenue Radiation Site, 8/19/93. P. 302254-302255.
120. Letter to Mr. Michael Pfarr, U.S. Army Corps of Engineers, from Mr. Gregory Daloisio, Roy F. Weston, Inc., re: The revised Rehabilitation Evaluation, 9/3/93. P. 302256-302314. The evaluation is attached.
121. Memorandum to Mr. Anthony Dappolone, U.S. EPA, from Mr. Victor J. Janosik, U.S. EPA, re: Reevaluation of the "repair" alternative for affected properties, 9/17/93. P. 302315-302317.
122. Memorandum to file from Mr. Victor J. Janosik, U.S. EPA, re: Summary of a September 9, 1993 meeting with owners of affected properties, 9/28/93. P. 302318-302319.
123. Memorandum to file from Mr. Victor J. Janosik, U.S. EPA, re: Status of the NPL listing of several site properties, 9/29/93. P. 302320-302321.
124. Memorandum to Mr. Stanley Laskowski, U.S. EPA, from Mr. Elliott P. Laws, U.S. EPA, re: Request for policy guidance for the proposed remedial action at the site, 12/17/93. P. 302322-302327. A memorandum dated December 16, 1993 regarding the legal authority to

replace demolished buildings at Superfund sites is attached.

125. Memorandum to Mr. Anthony Dappolone, U.S. EPA, from Mr. Victor Janosik, U.S. EPA, re: Zoning ordinances within Lansdowne Borough, 1/4/94. P. 302328-302328.
126. Letter to Mr. Kevin Hess, PADER, from Mr. Victor J. Janosik, U.S. EPA, re: Review of the draft Proposed Plan, 1/21/94. P. 302329-302329.
127. Report: Technical Specifications for the Dismantlement, Excavation, Remediation, and Restoration of Properties at the Austin Avenue Radiation Site, Delaware County, Pennsylvania, Volume 1, General Requirements, prepared by Roy F. Weston, Inc., 2/94. P. 302330-302613.
128. Report: Technical Specifications for the Dismantlement, Excavation, Remediation, and Restoration of Properties at the Austin Avenue Radiation Site, Delaware County, Pennsylvania, Volume 2, Divisions 2 Through 16, prepared by Roy F. Weston, Inc., 2/94. P. 302614-303005.
129. Drawings Report: Austin Avenue Radiation Site, Delaware County, Pennsylvania, prepared by U.S. EPA, PADER, U.S. Army Corps of Engineers, and Roy F. Weston, Inc., 2/94. P. 303006-303140.
130. Ordinance No. 1049, Lansdowne Zoning Ordinance of 1985, Borough of Lansdowne, Delaware County, Pennsylvania, (undated). P. 303141-303222.
131. Letter to Mr. Victor Janosik, U.S. EPA, from Mr. Kevin J. Hess, PADER, re: Comments to the Draft Revised Proposed Plan, 1/26/94. P. 303223-303224.
132. U.S. EPA Superfund Program Fact Sheet, Revised Proposed Remedial Action Plan, Austin Avenue Radiation Superfund Site, (undated). P. 303225-303249.
133. Letter to Mr. Kevin Hess, PADER, from Mr. Victor J. Janosik, U.S. EPA, re: Transmittal letter for the revised Proposed Remedial Action Plan and request for review, 1/21/94. P. 303250-303250.
134. Letter to Mr. Kevin Hess, PADER, from Mr. Victor J. Janosik, U.S. EPA, re: Transmittal letter for the revised Proposed Remedial Action Plan and request for review and notification of the public comment period, 2/24/94. P. 303251-303251.
135. Letter to Mr. Kevin Hess, PADER, from Mr. Victor J. Janosik, U.S. EPA, re: Notification of the meetings with the public and the issues to be discussed, 2/24/94. P. 303252-303252.
136. Memorandum to Mr. Anthony Dappolone, U.S. EPA, from Mr. Victor Janosik, U.S. EPA, re: Information on the Austin Avenue meetings, 3/2/94. P. 303253-303253.
137. Letter to Ms. Leanne Nurse, U.S. EPA, from 6 East Plumstead Avenue, re: Request for an extension to the comment period, 3/3/94. P. 303254-303254.
138. Letter to Mr. Stanley Laskowski, U.S. EPA, from 10 East Plumstead Avenue, re: Disapproval of change in the Proposed Remedial Action Plan to the homeowner's house, 3/7/94. P. 303255-303256.
139. Letter to Mayor Jack Edmonson, Aldan Borough Municipal Building, from Mr. Victor J. Janosik, U.S. EPA, re: Clarification of the alternatives for onsite replacement of the structures and offsite relocation, 3/8/94. P. 303257-303257.
140. Letter to Mayor Robert Dimond, East Lansdowne Borough Hall, from Mr. Victor J. Janosik, U.S. EPA, re: Clarification of the alternatives for onsite replacement of the structures and offsite relocation, 3/8/94. P. 303258-303258.
141. Letter to Mayor Daniel Devlin, Darby Borough Building, from Mr. Victor

- J. Janosik, U.S. EPA, re: Clarification of the alternatives for onsite replacement of the structures and offsite relocation, 3/8/94. P. 303259-303259.
142. Letter to Mr. John E. Clark, Upper Darby Township Council, from Mr. Victor J. Janosik, U.S. EPA, re: Clarification of the alternatives for onsite replacement of the structures and offsite relocation, 3/8/94. P. 303260-303260.
143. Letter to Mr. George Bochanski, Lansdowne Borough Council, from Mr. Victor J. Janosik, U.S. EPA, re: Clarification of the alternatives for onsite replacement of the structures and offsite relocation, 3/8/94. P. 303261-303261.
144. Letter to Mr. George Bobnak, East Lansdowne Borough Council, from Mr. Victor J. Janosik, U.S. EPA, re: Clarification of the alternatives for onsite replacement of the structures and offsite relocation, 3/8/94. P. 303262-303262.
145. Letter to Mr. John D. Bellopede, Aldan Borough Council, from Mr. Victor J. Janosik, U.S. EPA, re: Clarification of the alternatives for onsite replacement of the structures and offsite relocation, 3/8/94. P. 303263-303263.
146. Letter to Mr. George Danyliw, PADER, from Mr. Victor J. Janosik, U.S. EPA, re: Clarification of the alternatives for onsite replacement of the structures and offsite relocation, 3/8/94. P. 303264-303264.
147. Letter to The Honorable Nicholas A. Micozzie, State Representative, from Mr. Victor J. Janosik, U.S. EPA, re: Clarification of the alternatives for onsite replacement of the structures and offsite relocation, 3/8/94. P. 303265-303265.
148. Letter to The Honorable Joseph Loeper, State Senator, from Mr. Victor J. Janosik, U.S. EPA, re: Clarification of the alternatives for onsite replacement of the structures and offsite relocation, 3/8/94. P. 303266-303266.
149. Letter to The Honorable Mario J. Civera, Jr., State Representative, from Mr. Victor J. Janosik, U.S. EPA, re: Clarification of the alternatives for onsite replacement of the structures and offsite relocation, 3/8/94. P. 303267-303267.
150. Letter to Mr. Wilbur Smith, Darby Borough Council, from Mr. Victor J. Janosik, U.S. EPA, re: Clarification of the alternatives for onsite replacement of the structures and offsite relocation, 3/8/94. P. 303268-303268.
151. Letter to Mayor John J. Rankin, Jr., Lansdowne Borough Hall, from Mr. Victor J. Janosik, U.S. EPA, re: Clarification of the alternatives for onsite replacement of the structures and offsite relocation, 3/8/94. P. 303269-303269.
152. Letter to Mayor Margaret Murdoch, Upper Darby Township Municipal Building, from Mr. Victor J. Janosik, U.S. EPA, re: Clarification of the alternatives for onsite replacement of the structures and offsite relocation, 3/8/94. P. 303270-303270.
153. Letter to 151 Lexington Avenue, from Mr. Victor J. Janosik, U.S. EPA, re: Clarification of the alternatives for onsite replacement of the structures and offsite relocation, 3/8/94. P. 303271-303271.
154. Letter to 136 Owen Avenue, from Mr. Victor J. Janosik, U.S. EPA, re: Clarification of the alternatives for onsite replacement of the structures and offsite relocation, 3/8/94. P. 303272-303272.
155. Letter to 6740 Baltimore Pike, from Mr. Victor J. Janosik, U.S. EPA,

- re: Clarification of the alternatives for onsite replacement of the structures and offsite relocation, 3/8/94. P. 303273-303273.
156. Letter to 3726 Rosemont Avenue, from Mr. Victor J. Janosik, U.S. EPA, re: Clarification of the alternatives for onsite replacement of the structures and offsite relocation, 3/8/94. P. 303274-303274.
157. Letter to 10 East Plumstead Avenue, from Mr. Victor J. Janosik, U.S. EPA, re: Clarification of the alternatives for onsite replacement of the structures and offsite relocation, 3/8/94. P. 303275-303275.
158. Letter to 534 San Diego Avenue, from Mr. Victor J. Janosik, U.S. EPA, re: Clarification of the alternatives for onsite replacement of the structures and offsite relocation, 3/8/94. P. 303276-303276.
159. Letter to 6 East Plumstead Avenue, from Mr. Victor J. Janosik, U.S. EPA, re: Clarification of the alternatives for onsite replacement of the structures and offsite relocation, 3/8/94. P. 303277-303277.
160. Letter to 151 Lexington Avenue, from Mr. Victor J. Janosik, U.S. EPA, re: Clarification of the alternatives for onsite replacement of the structures and offsite relocation, 3/8/94. P. 303278-303278.
161. Letter to 623 Pine Street, from Mr. Victor J. Janosik, U.S. EPA, re: Clarification of the alternatives for onsite replacement of the structures and offsite relocation, 3/8/94. P. 303279-303279.
162. Letter to 1264 Country Club Drive, from Mr. Victor J. Janosik, U.S. EPA, re: Clarification of the alternatives for onsite replacement of the structures and offsite relocation, 3/8/94. P. 303280-303280.
163. Letter to 216 Haddon Avenue, from Mr. Victor J. Janosik, U.S. EPA, re: Clarification of the alternatives for onsite replacement of the structures and offsite relocation, 3/8/94. P. 303281-303281.
164. Letter to 911 Greenbriar Road, from Mr. Victor J. Janosik, U.S. EPA, re: Clarification of the alternatives for onsite replacement of the structures and offsite relocation, 3/8/94. P. 303282-303282.
165. Letter to 310 Shadeland Avenue, from Mr. Victor J. Janosik, U.S. EPA, re: Clarification of the alternatives for onsite replacement of the structures and offsite relocation, 3/8/94. P. 303283-303283.
166. Letter to 16 East Plumstead Avenue, from Mr. Victor J. Janosik, U.S. EPA, re: Clarification of the alternatives for onsite replacement of the structures and offsite relocation, 3/8/94. P. 303284-303284.
167. Letter to 211 Penn Boulevard, from Mr. Victor J. Janosik, U.S. EPA, re: Clarification of the alternatives for onsite replacement of the structures and offsite relocation, 3/8/94. P. 303285-303285.
168. Letter to 140 Hilldale Road, from Mr. Victor J. Janosik, U.S. EPA, re: Clarification of the alternatives for onsite replacement of the structures and offsite relocation, 3/8/94. P. 303286-303286.
169. Letter to 219 Wayne Avenue, from Mr. Victor J. Janosik, U.S. EPA, re: Clarification of the alternatives for onsite replacement of the structures and offsite relocation, 3/8/94. P. 303287-303287.
170. Letter to 237 North Lansdowne Avenue, from Mr. Victor J. Janosik, U.S. EPA, re: Clarification of the alternatives for onsite replacement of the structures and offsite relocation, 3/8/94. P. 303288-303288.
171. Letter to 215 Ridley Avenue, from Mr. Victor J. Janosik, U.S. EPA, re: Clarification of the alternatives for onsite replacement of the structures and offsite relocation, 3/8/94. P. 303289-303289.

172. Letter to 64 South Clifton Avenue, from Mr. Victor J. Janosik, U.S. EPA, re: Clarification of the alternatives for onsite replacement of the structures and offsite relocation, 3/8/94. P. 303290-303290.
173. Letter to 621 Pine Street, from Mr. Victor J. Janosik, U.S. EPA, re: Clarification of the alternatives for onsite replacement of the structures and offsite relocation, 3/8/94. P. 303291-303291.
174. Letter to 64 South Union Street, from Mr. Victor J. Janosik, U.S. EPA, re: Clarification of the alternatives for onsite replacement of the structures and offsite relocation, 3/8/94. P. 303292-303292.
175. Letter to 3723 Huey Avenue, from Mr. Victor J. Janosik, U.S. EPA, re: Clarification of the alternatives for onsite replacement of the structures and offsite relocation, 3/8/94. P. 303293-303293.
176. Letter to 201 Buck Road, from Mr. Victor J. Janosik, U.S. EPA, re: Clarification of the alternatives for onsite replacement of the structures and offsite relocation, 3/8/94. P. 303294-303294.
177. Letter to Mr. Stanley L. Laskowski, U.S. EPA, from 151 Lexington Avenue, re: Comments on the meeting with EPA concerning the Revised Proposed Remedial Action Plan, 3/10/94. P. 303295-303299.
178. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Matthew Schultz, Greater Lansdowne Civic Association, re: Comments on the decision to rebuild the radium contaminated homes in eastern Delaware County, 3/13/94. P. 303300-303300.
179. Information on assessments, submitted by Richard J. Daisley, 3/15/94. P. 303301-303301.
180. Letter to Ms. Leanne Nurse, U.S. EPA, from Mayor John J. Rankin, Jr., re: Comments on the Revised Proposed Remedial Action Plan, 3/15/94. P. 303302-303303.
181. Handwritten letter to Ms. Leanne Nurse, U.S. EPA, from 211 Penn Boulevard, re: Preferred remedy for cleanup, 3/16/94. P. 303304-303304.
182. Memorandum to file from Mr. Victor J. Janosik, U.S. EPA, re: Public meeting on the Revised Proposed Remedial Action Plan, 3/16/94. P. 303305-303305.
183. Letter to 3723 Huey Avenue, from Mr. Victor J. Janosik, U.S. EPA, re: Modification to the Revised Proposed Remedial Action Plan, 3/23/94. P. 303306-303307.
184. Letter to 64 South Union Street, from Mr. Victor J. Janosik, U.S. EPA, re: Modification to the Revised Proposed Remedial Action Plan, 3/23/94. P. 303308-303309.
185. Letter to 6740 Baltimore Pike, from Mr. Victor J. Janosik, U.S. EPA, re: Modification to the Revised Proposed Remedial Action Plan, 3/23/94. P. 303310-303311.
186. Letter to 3726 Rosemont Avenue, from Mr. Victor J. Janosik, U.S. EPA, re: Modification to the Revised Proposed Remedial Action Plan, 3/23/94. P. 303312-303313.
187. Letter to 10 East Plumstead Avenue, from Mr. Victor J. Janosik, U.S. EPA, re: Modification to the Revised Proposed Remedial Action Plan, 3/23/94. P. 303314-303315.
188. Letter to 534 San Diego Avenue, from Mr. Victor J. Janosik, U.S. EPA, re: Modification to the Revised Proposed Remedial Action Plan, 3/23/94. P. 303316-303317.

189. Letter to 6 East Plumstead Avenue, from Mr. Victor J. Janosik, U.S. EPA, re: Modification to the Revised Proposed Remedial Action Plan, 3/23/94. P. 303318-303319.
190. Letter to 151 Lexington Avenue, from Mr. Victor J. Janosik, U.S. EPA, re: Modification to the Revised Proposed Remedial Action Plan, 3/23/94. P. 303320-303321.
191. Letter to 201 Buck Road, from Mr. Victor J. Janosik, U.S. EPA, re: Modification to the Revised Proposed Remedial Actin Plan, 3/23/94. P. 303322-303323.
192. Letter to 216 Haddon Avenue, from Mr. Victor J. Janosik, U.S. EPA, re: Modification to the Revised Proposed Remedial Action Plan, 3/23/94. P. 303324-303325.
193. Letter to 911 Greenbriar Road, from Mr. Victor J. Janosik, U.S. EPA, re: Modification to the Revised Proposed Remedial Action Plan, 3/23/94. P. 303326-303327.
194. Letter to 310 Shadeland Avenue, from Mr. Victor J. Janosik, U.S. EPA, re: Modification to the Revised Proposed Remedial Action Plan, 3/23/94. P. 303328-303329.
195. Letter to 16 East Plumstead Avenue, from Mr. Victor J. Janosik, U.S. EPA, re: Modification to the Revised Proposed Remedial Action Plan, 3/23/94. P. 303330-303331.
196. Letter to 211 Penn Boulevard, from Mr. Victor J. Janosik, U.S. EPA, re: Modification to the Revised Proposed Remedial Action Plan, 3/23/94. P. 303332-303333.
197. Letter to 140 Hilldale Road, from Mr. Victor J. Janosik, U.S. EPA, re: Modification to the Revised Proposed Remedial Action Plan, 3/23/94. P. 303334-303335.
198. Letter to 219 Wayne Avenue, from Mr. Victor J. Janosik, U.S. EPA, re: Modification to the Revised Proposed Remedial Action Plan, 3/23/94. P. 303336-303337.
199. Letter to 237 North Lansdowne Avenue, from Mr. Victor J. Janosik, U.S. EPA, re: Modification to the Revised Proposed Remedial Action Plan, 3/23/94. P. 303338-303339.
200. Letter to 621 Pine Street, from Mr. Victor J. Janosik, U.S. EPA, re: Modification to the Revised Proposed Remedial Action Plan, 3/23/94. P. 303340-303341.
201. Letter to 64 South Clifton Avenue, from Mr. Victor J. Janosik, U.S. EPA, re: Modification to the Revised Proposed Remedial Action Plan, 3/23/94. P. 303342-303343.
202. Letter to 215 Ridley Avenue, from Mr. Victor J. Janosik, U.S. EPA, re: Modification to the Revised Proposed Remedial Action Plan, 3/23/94. P. 303342-303345.
203. Letter to 1264 Country Club Drive, from Mr. Victor J. Janosik, U.S. EPA, re: Modification to the Revised Proposed Remedial Action Plan, 3/23/94. P. 303346-303347.
204. Letter to 623 Pine Street, from Mr. Victor J. Janosik, U.S. EPA, re: Modification to the Revised Proposed Remedial Action Plan, 3/23/94. P. 303348-303349.
205. Letter to 136 Owen Avenue, from Mr. Victor J. Janosik, U.S. EPA, re: Modification to the Revised Proposed Remedial Action Plan, 3/23/94. P. 303350-303351.

206. Letter to 151 Lexington Avenue, from Mr. Victor J. Janosik, U.S. EPA, re: Modification to the Revised Proposed Remedial Action Plan, 3/23/94. P. 303352-303353.
207. Letter to The Honorable Nicholas A. Micozzie, State Representative, from Mr. Victor J. Janosik, U.S. EPA, re: Modification to the Revised Proposed Remedial Action Plan, 3/23/94. P. 303354-303355.
208. Letter to The Honorable Joseph Loeper from Mr. Victor J. Janosik, U.S. EPA, re: Modification to the Revised Proposed Remedial Action Plan, 3/23/94. P. 303356-303357.
209. Letter to The Honorable Mario J. Civera, Jr. from Mr. Victor J. Janosik, U.S. EPA, re: Modification to the Revised Proposed Remedial Action Plan, 3/23/94. P. 303358-303359.
210. Letter to Mr. George Danyliw, PADER, from Mr. Victor J. Janosik, U.S. EPA, re: Modification to the Revised Proposed Remedial Action Plan, 3/23/94. P. 303360-303361.
211. Letter to Mr. Wilbur Smith, Darby Borough Council, from Mr. Victor J. Janosik, U.S. EPA, re: Modification to the Revised Proposed Remedial Action Plan, 3/23/94. P. 303362-303363.
212. Letter to Mr. John J. Rankin, Lansdowne Borough Hall, from Mr. Victor J. Janosik, U.S. EPA, re: Modification to the Revised Proposed Remedial Action Plan, 3/23/94. P. 303364-303365.
213. Letter to Mayor Margaret Murdoch, Upper Darby Township Municipal Building, from Mr. Victor J. Janosik, U.S. EPA, re: Modification to the Revised Proposed Remedial Action Plan, 3/23/94. P. 303366-303367.
214. Letter to Mayor Jack Edmonson, Aldan Borough Municipal Building, from Mr. Victor J. Janosik, U.S. EPA, re: Modification to the Revised Proposed Remedial Action Plan, 3/23/94. P. 303368-303369.
215. Letter to Mayor Robert Dimond, East Lansdowne Borough Hall, from Mr. Victor J. Janosik, U.S. EPA, re: Modification to the Revised Proposed Remedial Action Plan, 3/23/94. P. 303370-303371.
216. Letter to Mayor Daniel Devlin, Darby Borough Building, from Mr. Victor J. Janosik, U.S. EPA, re: Modification to the Revised Proposed Remedial Action Plan, 3/23/94. P. 303372-303373.
217. Letter to Mr. John E. Clark, Upper Darby Township Council, from Mr. Victor J. Janosik, U.S. EPA, re: Modification to the Revised Proposed Remedial Action Plan, 3/23/94. P. 303374-303375.
218. Letter to Mr. George Bochanski, Lansdowne Borough Council, from Mr. Victor J. Janosik, U.S. EPA, re: Modification to the Revised Proposed Remedial Action Plan, 3/23/94. P. 303376-303377.
219. Letter to Mr. George Bobnak, East Lansdowne Borough Council, from Mr. Victor J. Janosik, U.S. EPA, re: Modification to the Revised Proposed Remedial Action Plan, 3/23/94. P. 303378-303379.
220. Letter to Mr. John D. Bellopede, Aldan Borough Council, from Mr. Victor J. Janosik, U.S. EPA, re: Modification to the Revised Proposed Remedial Action Plan, 3/23/94. P. 303380-303381.
221. Letter to Mr. Peter Kostmayer, U.S. EPA, from 623 Pine Street, re: Request for property to be placed on the top of the list for preference to relocate, 3/25/94. P. 303382-303382.
222. Letter to Ms. Leanne Nurse, U.S. EPA, from 214 Wayne Avenue, re: Concerns of property owners living adjacent to the condemned sites, 4/24/94. P. 303383-303383.

223. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Robert P. Frank, Reed, Smith, Shaw, & McClay, re: Comments on the Revised Proposed Remedial Action Plan, 4/29/94. P. 303384-303394.
224. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Michael F.X. Coll, re: Comments on the Revised Proposed Remedial Action Plan, 4/29/94. P. 303395-303398.
225. Letter to Mr. Kevin Hess, PADER, from Mr. Victor J. Janosik, U.S. EPA, re: Transmittal letter for the draft Record of Decision and request for its review and comments, 5/12/94. P. 303399-303399.
226. Letter to Mr. Kevin Hess, PADER, from Mr. Victor J. Janosik, U.S. EPA, re: Transmittal letter for the draft Responsiveness summary and request for its review and comments, 5/25/94. P. 303400-303400.
227. Letter to Mr. Victor Janosik, U.S. EPA, from Mr. Kevin J. Hess, PADER, re: Review of the draft Record of Decision, 5/27/94. P. 303401-303402.
228. Memorandum to Austin Group from Ms. Lorie Baker, U.S. EPA, re: Final NPL listing, 6/8/94. P. 303403-303403.
229. Letter to Mr. Kevin Hess, PADER, from Mr. Victor J. Janosik, U.S. EPA, re: Uranium contamination of groundwater, 6/14/94. P. 303404-303408. A facsimile cover sheet and a Preliminary Report of Analysis dated June 3, 1994 are attached.
230. Letter to Mr. Kevin Hess, PADER, from Mr. Victor J. Janosik, U.S. EPA, re: Request for review of the Final Draft of the Record of Decision, 6/15/94. P. 303409-303410.
231. Letter to Mr. Peter H. Kostmayer, U.S. EPA, from Mr. James W. Rue, PADER, re: Concurrence with the Record of Decision, 6/27/94. P. 303411-303412.
232. Record of Decision, Austin Avenue Radiation Site, Declaration, 6/27/94. P. 303413-303559.

#### IV. REMEDIAL RESPONSE PLANNING

1. Memorandum to file from Mr. Walter Lee, U.S. EPA, re: Pollution Report #3 and an Action Memorandum to document the approval of a \$50,000 removal activation, 6/18/91. P. 400001-400004.
2. Memorandum to Mr. Donald R. Clay, U.S. EPA, from Mr. Edwin B. Erickson, U.S. EPA, re: Approval of a request for additional funds for a removal action, 7/23/91. P. 400005-400028. The following are attached:
  - a) a memorandum regarding the request for additional funds for a removal action, dated July 23, 1991;
  - b) a memorandum regarding Pollution Report #3 and an Action Memorandum documenting a \$50,000 removal activation, dated June 19, 1991;
  - c) a site location map;
  - d) a diagram of the site;
  - e) a memorandum regarding the revised cost estimate for survey and site assessment, dated June 26, 1991;
  - f) a memorandum regarding the cost estimate for survey and site assessment, dated June 25, 1991;
  - g) the Scope of Work for Lansdowne, PA Survey and Site Assessment;



- h) an Agency for Toxic Substances and Disease Registry (ATSDR) Record of Activity, dated November 13, 1991.
3. Memorandum to Mr. Donald R. Clay, U.S. EPA, from Mr. Edwin B. Erickson, U.S. EPA, re: Approval of a request for a change in the Scope of Response for the Removal Action, 11/21/91. P. 400029-400037. A memorandum dated November 21, 1991 regarding the request for a change in the Scope of Work for Removal Action is attached.
  4. Memorandum to Mr. Donald R. Clay, U.S. EPA, from Mr. Edwin B. Erickson, U.S. EPA, re: Approval of a request for additional funds for the removal action, 11/21/91. P. 400038-400066. The following are attached:
    - a) a memorandum regarding a request for additional funds for the removal action, dated November 21, 1991;
    - b) a site location map;
    - c) a diagram of the site;
    - d) a U.S. EPA fact sheet regarding the issuance of a Federal Public Health Advisory, dated September 30, 1991;
    - e) a letter regarding the Public Health Advisory, dated September 6, 1991;
    - f) the Public Health Advisory;
    - g) a memorandum regarding a health consultation June 28, 1991;
  5. Memorandum to Mr. Don R. Clay, U.S. EPA, from Mr. Henry L. Longest, II, U.S. EPA, re: Request for a ceiling increase and exemption from the \$2 million and 12 month statutory limits, 3/10/92. P. 400067-400108. The following are attached:
    - a) a memorandum regarding a request for a ceiling increase and exemption from the \$2 million and 12 month statutory limits, (undated), with portions underlined;
    - b) a memorandum regarding a request for a ceiling increase and exemption from the \$2 million and 12 month statutory limits, dated February 14, 1992;
    - c) a memorandum regarding a request for a ceiling increase and exemption from the \$2 million and 12 month statutory limits, (undated);
    - d) a letter regarding EPA's activities at the site, dated February 5, 1992;
    - e) a memorandum regarding a health consultation, dated January 10, 1992;
    - f) Radiation Risks among Relocated and Non-Relocated Persons at the Austin Avenue Site, dated January 28, 1992;
    - g) Basis for Relocation Decisions at the Austin Avenue Superfund Site, dated January 6, 1992.
  6. Memorandum to Mr. Donald R. Clay, U.S. EPA, from Mr. Edwin B. Erickson, U.S. EPA, re: Approval of a request for a change in the Scope of Response for additional funds, 7/9/92. P. 400109-400117. A memorandum dated July 9, 1992 regarding a request for a change in the Scope of Work and additional funds over the \$2 million statutory limit is attached.

7. Memorandum to Mr. Donald R. Clay, U.S. EPA, from Mr. Edwin B. Erickson, U.S. EPA, re: Approval of a request for additional funds over the \$2 million statutory limit for removal actions, 10/20/92. P. 400118-400129. A memorandum dated October 20, 1992 regarding the request for additional funds over the \$2 million statutory limit for removal actions is attached.

V. COMMUNITY INVOLVEMENT/CONGRESSIONAL CORRESPONDENCE/IMAGERY

1. Map, Eastern Delaware County showing the two-mile radius where EPA's scanner van measured for radium, 1990. P. 500001-500001.
2. Newspaper article entitled "Radium: Yesterday's marvel, today's mess," The Philadelphia Inquirer, 1991 P. 500002-500003.
3. Newspaper article entitled "Private testing triggers 'hot' tip," Daily Times, 6/20/91. P. 500004-500007.
4. Newspaper article entitled "EPA preliminary reports: Homes near radioactive house safe," News of Delaware County, 6/26/91. P. 500008-500008.
5. Newspaper article entitled "EPA investigates house for high radiation levels," The Philadelphia Inquirer, 6/30/91. P. 500009-500009.
6. U.S. EPA Fact Sheet, re: Background and EPA activity information, 7/91. P. 500010-500010.
7. U.S. EPA Fact Sheet, re: Offering of household radiation surveys, 7/17/91. P. 500011-500011.
8. U.S. EPA Fact Sheet, re: Availability of EPA staff to discuss the site, 7/19/91. P. 500012-500012.
9. U.S. EPA Public Notice, re: Announcement of a public meeting, 7/27/91. P. 500013-500013.
10. Newspaper article entitled "EPA: Radiation no 'substantial health risk' to neighbors," News of Delaware County, 7/31/91. P. 500014-500014.
11. Newspaper article entitled "EPA rechecks 'hot' house," Delaware County Daily Times, 9/18/91. P. 500015-500015.
12. Newspaper article entitled "Early tests indicate high radiation level in Lansdowne house," The Philadelphia Inquirer, 9/26/91. P. 500016-500016.
13. U.S. EPA Fact Sheet, re: Issuance of a Federal Public Health Advisory, 9/30/91. P. 500017-500018.
14. Newspaper article entitled "Feds ticket 'hot' house for cleanup," Delaware County Daily Times, 10/1/91. P. 500019-500019.
15. Newspaper article entitled "EPA declares another Superfund site in Lansdowne," News of Delaware County, 10/2/91. P. 500020-500021.
16. U.S. EPA Fact Sheet, re: The radiation scanner van, 11/5/91. P. 500022-500023. A description of the scanner van is attached.
17. Newspaper article entitled "'Hot house' owner rips feds," Delaware County Daily Times, 11/5/91. P. 500024-500024.
18. Newspaper article entitled "'Hot' warehouse to turn orange before demolition," Delaware County Daily Times, 11/8/91. P. 500025-500025.
19. Newspaper article entitled "EPA urged to buy Superfund house," The

- Philadelphia Inquirer, 11/10/91. P. 500026-500026.
20. Newspaper article entitled "EPA searches 4 towns for missing radium," News of Delaware County, 11/13/91. P. 500027-500027. A newspaper article entitled "Landlord faces foreclosure" is attached.
  21. U.S. EPA Environmental News, re: Three new contaminated locations found by the scanner van, 11/14/91. P. 500028-500029.
  22. Newspaper article entitled "EPA detects tainting," The Philadelphia Inquirer, 11/14/91. P. 500030-500030.
  23. Newspaper headline entitled "Evacuated, EPA takes family from 'hot' house," Daily Times, 11/15/91. P. 500031-500031.
  24. Newspaper article entitled "EPA orders 2 to evacuate house in E. Lansdowne over radiation," The Philadelphia Inquirer, 11/15/91. P. 500032-500033. Two newspaper articles entitled "EPA finds radiation at another site" and "Senator Spector plans to visit radium site in Lansdowne" are attached.
  25. Newspaper article entitled "Owners must leave radioactive home in E. Lansdowne," News of Delaware County, 11/20/91. P. 500034-500035.
  26. Newspaper article entitled "Family moved out," Daily Times, 11/21/91. P. 500036-500037. A title page entitled "Another 'hot' house" is attached.
  27. U.S. EPA Fact Sheet, re: Site background and present activities, 11/22/91. P. 500038-500039.
  28. Newspaper article entitled "Radiation forces 2nd E. Lansdowne evacuation," The Philadelphia Inquirer, 11/22/91. P. 500040-500040. Two newspaper articles entitled "3rd radon evacuation" and "More radon tests near warehouse" are attached.
  29. Newspaper article entitled "EPA broadens search for radiation in area buildings," The Philadelphia Inquirer, 11/23/91. P. 500041-500041.
  30. Newspaper article entitled "'Hot' scan expands," Sunday Times, 11/24/91. P. 500042-500043.
  31. Newspaper article entitled "5 homes in borough contaminated," The Philadelphia Inquirer, 11/24/91. P. 500044-500046.
  32. Newspaper article entitled "EPA to delay Delco search for radiation," The Philadelphia Inquirer, 11/26/91. P. 500047-500047.
  33. Newspaper article entitled "EPA targets 3 more homes," News of Delaware County, 12/4/91. P. 500048-500048.
  34. Newspaper article entitled "Feds ID low-risk find," Delaware County Daily Times, 12/4/91. P. 500049-500049.
  35. U.S. EPA Fact Sheet, re: Health information about radium and radon, 12/5/91. P. 500050-500051.
  36. Newspaper article entitled "EPA fields questions on radiation problem," Delaware County Daily Times, 12/6/91. P. 500052-500052.
  37. Newspaper article entitled "Her obsession is radiation," The Philadelphia Inquirer, 12/6/91. P. 500053-500055. A partial newspaper article entitled "In E. Lansdowne, lives changed overnight" is attached.
  38. Newspaper article entitled "Feds expand radiation scan into South West Philly," Delaware County Daily Times, 12/10/91. P. 500056-500056. A partial untitled newspaper article, and two newspaper articles

entitled "More radiation checks" and "EPA expands radiation tests in Upper Darby, Clifton Heights" are attached.

39. Newspaper article entitled "Why radiation wasn't found in Lansdowne seven years ago," News of Delaware County, 12/11/91. P. 500057-500058. Two newspaper articles entitled "Two video tapes about radiation available" and "People tense about radiation, health concerns" are attached.
40. Newspaper article entitled "Families invisible threat: Radium," USA Today, 12/12/91. P. 500059-500059.
41. U.S. EPA Fact Sheet, re: Site history, 12/13/91. P. 500060-500061.
42. Newspaper article entitled "Irradiated Sand Imperils Pennsylvania Houses," The New York Times, 12/15/91. P. 500062-500062.
43. Newspaper article entitled "West Phila. homes rated safe from radioactivity," The Philadelphia Daily News, 12/18/91. P. 500063-500063.
44. Newspaper article entitled "EPA says West Phila. is free of radiation," The Philadelphia Inquirer, 12/18/91. P. 500064-500064.
45. Newspaper article entitled "'Hot' property to be razed," Delaware County Daily Times, 12/18/91. P. 500065-500065.
46. Sierra Watch Fact Sheet, prepared by Sierra Club Centennial, 1992. P. 500066-500066.
47. U.S. EPA Fact Sheet, re: Site activities, 1/3/92. P. 500067-500070.
48. Newspaper article entitled "Survey Finds 25 Homes Tainted by Radium," The New York Times, 1/5/92. P. 500071-500072.
49. Newspaper article entitled "'Hot' building will be razed," Daily Times, 1/7/92. P. 500073-500074.
50. Newspaper article entitled "Feds field 'hot' quires," Delaware County Daily Times, 1/8/92. P. 500075-500075.
51. Newspaper article entitled "4 more radioactive homes found: EPA's testing is complete," News of Delaware County, 1/8/92. P. 500076-500077.
52. Letter to residents from Ms. Leanne Nurse, U.S. EPA, re: Site activities and parking restrictions, 1/20/92. P. 500078-500078.
53. Newspaper article entitled "'Hot' houses," Delaware County Sunday Times, 1/26/92. P. 500079-500080.
54. U.S. EPA Fact Sheet, re: Radon testing information, 1/30/92. P. 500081-500082.
55. Newspaper article entitled "Follow-up testing IDs two more 'hot' homes," Delaware County Daily Times, 1/31/92. P. 500083-500083. A newspaper article entitled "Radiation cleanup begins" is attached.
56. Newspaper article entitled "Two more houses in Delco found to be contaminated," The Philadelphia Inquirer, 1/31/92. P. 500084-500084.
57. Newspaper article entitled "'Hot' residents want state aid," Daily Times, 2/3/92. P. 500085-500085.
58. U.S. EPA Fact Sheet, re: A media briefing about the site, 2/7/92. P. 500086-500086.
59. Newspaper article entitled "Another hot house found," News of Delaware County, 2/19/92. P. 500087-500087. Two newspaper articles entitled "EPA finds high radiation in another home in Delco" and "Another toxic

house" are attached.

60. Newspaper article entitled "'Hot' spots in the park," Delaware County Daily Times, 2/25/92. P. 500088-500088.
61. Newspaper article entitled "Radioactive soil found in and near Yeadon Park," The Philadelphia Inquirer, 2/25/92. P. 500089-500089.
62. Yeadon swim club," The Philadelphia Inquirer, 3/3/92. P.N 500090-500090.
63. Newspaper photograph entitled "'Hot' warehouse dismantled," Delaware County Daily Times, 3/6/92. P. 500091-500091.
64. Newspaper photograph entitled "Radium site cleanup continues," The Philadelphia Inquirer, 3/12/92. P. 500092-500092.
65. Newspaper article entitled "Tax break sought for tainted homes," The Philadelphia Inquirer, 3/14/92. P. 500093-500093.
66. Article entitled "The Mobile Scanner Van Reports for Duty," (no source cited), 6/92. P. 500094-500095.
67. U.S. EPA Fact Sheet, re: Site activities, 6/92. P 500096-500096.
68. Newspaper article entitled "Is soil at Bartol Tract contaminated?," News of Delaware County, 6/17/92. P. 500097-500097.
69. Letter to Dr. Walter F. Lee, U.S. EPA, from a resident, re: Confirmation of the residents preference for EPA to furnish them with a new home pending demolition 8/3/92. P. 500098-500098.
70. Letter to resident from Mr. Walter F. Lee, U.S. EPA, re: Clarification of options for remediation, 8/28/92. P. 500099-500104. A letter dated September 11, 1992 regarding a resident's preference for the demolition option and a letter dated September 19, 1992 regarding clarification of why EPA can not purchase property are attached.
71. Letter to Dr. Walter F. Lee, U.S. EPA, from a resident, re: Clarification of the three options for remediation and preference for the demolition option, 8/28/92. P. 500105-500107. A memorandum dated August 14, 1992 regarding removal of mortar and samples taken from a house is attached.
72. Letter to Dr. Lee, U.S. EPA, from a resident, re: Response to review of the Characterization Report for the residents house and preference for relocation, 9/3/92. P. 500108-500109.
73. Handwritten letter Mr. Walter Lee, U.S. EPA, from a resident, re: Remediation option preferences, 9/8/92. P. 500110-500110.
74. Newspaper article entitled "Deadly radon threatens area," The Philadelphia Daily News, 9/29/92. P. 500111-500111.
75. Newspaper article entitled "'Hot houses' under review," Delaware County Daily Times, 10/5/92. P. 500112-500112.
76. Newspaper article entitled "EPA, owner duel over 133 Austin Ave.," The Philadelphia Inquirer, 10/8/92. P. 500113-500113.
77. U.S. EPA Environmental News entitled "EPA Adds Austin Avenue Radiation Site To Its National Priorities List," 10/14/92. P. 500114-500117.
78. Newspaper article entitled "29 contaminated homes in Delco added to Superfund cleanup list," The Philadelphia Inquirer, 10/15/92. P. 500118-500118.
79. Handwritten letter to Walter from a resident, re: Concerns about

- radiation in the residents' home, 10/21/92. P. 500119-500120.
80. Memorandum to file from Mr. Victor J. Janosik, U.S. EPA, re: Summary of an October 22, 1992 public meeting, 10/28/92. P. 500121-500122.
  81. Memorandum to residents from Mr. Thomas C. Voltaggio, U.S. EPA, re: Invitation to attend a meeting with EPA, 11/9/92. P. 500123-500125. A Superfund Remedial Process table and the proposed agenda for the meeting are attached.
  82. Memorandum to file from Mr. Victor J. Janosik, U.S. EPA, re: Summary of a meeting with property owners, 12/9/92. P. 500126-500127.
  83. Letter to Mr. Victor Janosik, U.S. EPA, from a resident, re: Choice of remedial option "C" for demolition and reconstruction, 1/29/93. P. 500128-500130. A letter dated August 27, 1992 regarding selection of remedial option B for relocation is attached.
  84. Letter to resident from Mr. Victor J. Janosik, U.S. EPA, re: Explanation of the relocation option, 2/12/93. P. 500131-500133. A letter dated January 29, 1993 regarding a choice of remedial option C is attached.
  85. Memorandum to file from Mr. Victor J. Janosik, U.S. EPA, re: Health consultation session sponsored by ATSDR, 2/17/93. P. 500134-500134.
  86. Six graphs of radiation dosages theoretically possible from radiation contaminated soils at the former W.L. Cummings warehouse, prepared by U.S. EPA, 3/1/93. P. 500135-500140.
  87. Diagram of 135 Austin Avenue, 3/24/93. P. 500141-500141.
  88. Letter to Mr. Victor Janosik, U.S. EPA, from a resident, re: Request for information on site activities, 4/9/93. P. 500142-500142.
  89. Letter to neighbor from Ms. Leanne Nurse, U.S. EPA, re: Site activity update, 5/14/93. P. 500143-500144. A table of remedial and removal activities is attached.
  90. Map showing the location of the former W.L. Cummings facility, (undated). P. 500145-500146.
  92. Newspaper article entitled "'Hotter' house," (no source cited), (undated). P. 500147-500147.
  91. Newspaper article entitled "EPA Evacuates home," (no source cited), (undated). P. 500148-500148.
  92. Newspaper article entitled "EPA: No fire hazard," (no source cited), (undated). P. 500149-500149. A newspaper article entitled "Feds expand health risk radius" is attached.
  93. Newspaper article entitled "More 'hot' houses ID'd," Daily Times, (undated). P. 500150-500150.
  94. Newspaper article entitled "Another Lansdowne home shows high radiation; evacuation urged," The Philadelphia Inquirer, (undated). P. 500151-500151.
  95. Newspaper article entitled "More 'hot' houses (no source cited), (undated). P. 500152-500152.
  96. Newspaper article entitled "3 more 'hot' homes," (no source cited), (undated). P. 500153-500153.
  97. Newspaper article entitled "Channel 31 tackles 'hothouse' issue," (no source cited), (undated). P. 500154-500154.

98. Newspaper article entitled "EPA starts cleanup at two sites," The Philadelphia Inquirer, (undated). P. 500155-500156.
99. Newspaper article entitled "Radium plant yielded more sand than believed," The Philadelphia Inquirer, (undated). P. 500157-500158.
100. Newspaper article entitled "3 'hot' houses found," (no source cited), (undated). P. 500159-500159.
101. Newspaper article entitled "EPA IDs 'hot houses'," (no source cited), (undated). P. 500160-500160.
102. Newspaper article entitled "Council urged to bar traffic from street," The Philadelphia Inquirer, (undated). P. 500161-500161.
103. Newspaper article entitled "EPA will delay search in Delco for radiation," The Philadelphia Inquirer, (undated). P. 500162-500162.
104. Newspaper article entitled "Daly blasts GOP for cleanup chaos," (no source cited), (undated). P. 500163-500163.
105. Journal article entitled "Radon Contamination Detected In 25 Philadelphia Area Homes," Nuclear Waste News (undated). P. 500164-500165.
106. Newspaper article entitled "Radium meeting set," (no source cited), (undated). P. 500166-500166.
107. Newspaper article entitled "EPA forums on radiation set in Delaware County," (no source cited), (undated). P. 500167-500167.
108. U.S. EPA Fact Sheet, re: Announcement of an information repository, (undated). P. 500168-500168.
109. NPL site description summary, Austin Avenue Radiation Site, (undated). P. 500169-500169.
110. Fact Sheet, re: Listing of the site on the NPL, (undated). P. 500170-500171. A list of property addresses is attached.
111. U.S. EPA Environmental Advisory, re: EPA Cleans Up Five Austin Avenue Site Houses, (undated). P. 500172-500173.
112. Handwritten note to Walter [Lee], re: Decision to relocate, (undated). P. 500174-500174.
113. Handwritten letter to Walter, re: Decision to relocate, (undated). P. 500175-500178. A handwritten letter regarding a resident's concerns about contamination at their home and a Family Day Care Home Certification of Registration are attached.
114. Newspaper article entitled "Man Has New ... In Radium," (no source cited), (undated). P. 500179-500180.
115. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Robert & Ms. Sarah Cocciardi, re: Comments and questions on EPA's proposed recommendations and recommended solution for remedial action at the effected property, 6/29/93. P. 500181-500181.
116. Letter to Mr. Stanley Laskowski, U.S. EPA, from Ms. Joanne Kammer and Harry, Julia, and Barbara Kammer, re: Concern about the radiation contamination problem, 6/29/93. P. 500182-500182.
117. Letter to Mr. Stanley Laskowski, U.S. EPA, from The Giovannucci Family, re: Concern about the radiation contamination problem, 6/30/93. P. 500183-500183.

118. Letter to Mr. Stanley Laskowski, U.S. EPA, from Ms. Cathleen C. Daly, re: Concern about the radiation contamination problem, 6/30/93. P. 500184-500184.
119. Letter to The Honorable Robert P. Casey, State of Pennsylvania, from Mr. Robert and Ms. Susan Hart, re: Concern about the radiation contamination problem, 6/30/93. P. 500185-500185.
120. Letter to Mr. Stanley Laskowski, U.S. EPA, from Ms. Rosemarie Richardson, re: Concern about the radiation contamination problem, 6/30/93. P. 500186-500186.
121. Letter to Mr. Stanley Laskowski, U.S. EPA, from Ms. Karen McNamara, re: Concern about the radiation contamination problem, 6/30/93. P. 500187-500187.
122. Letter to The Honorable Robert P. Casey, State of Pennsylvania, from The Clark Family, re: Concern about the radiation contamination problem, 6/30/93. P. 500188-500188.
123. Letter to Mr. Stanley Laskowski, U.S. EPA, from Mr. & Mrs. Ashton L. Townsley, re: Concern about the radiation contamination problem, 6/30/93. P. 500189-500189.
124. Letter to The Honorable Robert P. Casey, State of Pennsylvania, from Ms. Virginia Cullen and Mr. David T. Cullen, re: Concern about the radiation contamination problem, 7/1/93. P. 500190-500190.
125. Letter to The Honorable Robert P. Casey, State of Pennsylvania, from Mr. Charles & Ms. Joan Lobb, re: Concern about the radiation contamination problem, 7/1/93. P. 500191-500191.
126. Letter to Mr. Laskowski, U.S. EPA, from Mr. Kenneth & Ms. Patricia Wright, re: Concern about the radiation contamination problem, 7/1/93. P.500192-500192.
127. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Craig W. Mann, Sharon Savings Bank, re: Comments on the June 30, 1993 EPA Public Notice and request for response, 7/1/93. P. 500193-500193.
128. Letter to Mr. Stanley Laskowski, U.S. EPA, from Mr. Robert and Mrs. Mary Jane DiChiacchio, re: Concern about unsafe homes in the Lansdowne neighborhood, 7/1/93. P. 500194-500194.
129. Letter to Mr. Stanley Laskowski, U.S. EPA, from Ms. Patriciann E. Lord, re: Concern about the radiation contamination problem, 7/2/93. P. 500195-500195.
130. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Peter B. Hill and Ms. Helen N. Hill, re: Disapproval of EPA's preferred alternative for cleaning up the radium-contaminated properties, 7/2/93. P. 500196-500196.
131. Letter to Mr. Stanley Laskowski, U.S. EPA, from Mr. Nicholas J. Arone and Ms. Patricia L. Arone, re: Concern about the radiation contamination problem, 7/4/93. P. 500197-500197.
132. Letter to Mr. Stanley Laskowski, U.S. EPA, from Ms. Lucille and Mr. Ryland Hanger, re: Concern about the radiation contamination problem, 7/4/93. P. 500198-500198.
133. Letter to Mr. Stanley Laskowski, U.S. EPA, from Mr. & Mrs. Carmen Pratico, re: Concern about the radiation contamination problem, 7/6/93. P. 500199-500199.
134. Letter to Mr. Stanley Laskowski, U.S. EPA, from Ms. Jane and Ms. Wendy C. Sheeran, re: Concern about the radiation contamination problem, 7/6/93. P. 500200-500200.



135. Letter to The Honorable Robert P. Casey, State of Pennsylvania, from Mr. George P. Butts and Ms. Grace Butts, re: Concern about the radiation contamination problem, 7/6/93. P. 500201-500201.
136. Letter to Mr. Stanley Laskowski, U.S. EPA, from Mr. William J. Baratta and Ms. Mary Lou Baratta, re: Concern about the radiation contamination problem, 7/6/93. P. 500202-500202.
137. Letter to Mr. Stanley Laskowski, U.S. EPA, from Mr. Richard E. Morrell, re: Concern about the radiation contamination problem, 7/6/93. P. 500203-500203.
138. Letter to Mr. Stanley Laskowski, U.S. EPA, from Mr. Patrick J. Butler and Ms. Susan W. Butler, re: Concern about the radiation contamination problem, 7/6/93. P. 500204-500204.
139. Letter to Mr. Laskowski, U.S. EPA, from Ms. Stephanie Mouzakitis, re: Concern about the radiation contamination problem, 7/6/93. P. 500205-500205.
140. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Robert A. Merieau, re: Disapproval of EPA's preferred alternative, 7/6/93. P. 500206-500206.
141. Letter to Mr. Stanley Laskowski, U.S. EPA, from Mr. Michael Markowicz, Catch America, Inc., re: Concern about the clean up of commercial properties, 7/7/93. P. 500207-500207.
142. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Mamie McCanney, re: Disapproval of EPA's preferred alternative, 7/7/93. P. 500208-500208.
143. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Susan L. McGram, re: Disapproval of EPA's preferred alternative, 7/7/93. P. 500209-500209.
144. Letter to Mr. Stanley Laskowski, U.S. EPA, from Mr. Randal L. Mattern and Ms. Monica Mattern, re: Concern about the radiation contamination problem, 7/8/93. P. 500210-500210.
145. Letter to Mr. Stanley Laskowski, U.S. EPA, from Ms. Karen E. Roper, re: Concern about the radiation contamination problem, 7/8/93. P. 500211-500211.
146. Letter to The Honorable Robert P. Casey, State of Pennsylvania, from Ms. Anna H. Piselli, re: Concern about the radiation contamination problem, 7/8/93. P. 500212-500212.
147. Letter to Mr. Stanley Laskowski, U.S. EPA, from Torpey J. White, re: Concern about the radiation contamination problem, 7/8/93. P. 500213-500213.
148. Letter to Mr. Stanley Laskowski, U.S. EPA, from Ms. Darla A. Pinte, re: Concern about the radiation contamination problem, 7/8/93. P. 500214-500214.
149. Letter to Mr. Stanley Laskowski, U.S. EPA, from Ms. Amy & Mr. Al Tielemans, Tielemans, re: Concern about the radiation contamination problem, 7/8/93. P. 500215-500215.
150. Letter to The Honorable Robert P. Casey, State of Pennsylvania, from Ms. Carol A. Plichter, re: Concern about the radiation contamination problem, 7/8/93. P. 500216-500216.
151. Letter to The Honorable Robert P. Casey, State of Pennsylvania, from Ms. Ann M. Boyd, re: Concern about the radiation contamination problem, 7/8/93. P. 500217-500217.
152. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Daniel Coladonato, re: Concern about thoroughness of the radium test and request for an inside radiation test to be performed on the Coladonato property,

153. Letter to Mr. Stanley Laskowski, U.S. EPA, from Ms. Nancy S. Bendon, re: Concern about the radiation contamination problem, 7/9/93. P. 500219-500219.
154. Letter to The Honorable Robert P. Casey, State of Pennsylvania, from Mr. Robert G. Faulkner, re: Concern about the radiation contamination problem, 7/9/93. P. 500220-500220.
155. Letter to The Honorable Robert P. Casey, State of Pennsylvania, from Mr. Armand & Ms. Jean Di Rienzie, re: Concern about the radiation contamination problem, 7/9/93. P. 500221-500221.
156. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Yvonne H. Adams, re: Disapproval of EPA's preferred alternative, 7/9/93. P. 500222-500222.
157. Memorandum to Mr. Frank Coyle, Mr. Lew Felleisen, and Mr. Bill Belanger, U.S. EPA from Mr. Mike Pyles, PADER, re: Letters received from Lansdowne residents, 7/9/93. P. 500223-500226. A facsimile cover sheet, a letter concerning the radiation contamination problem, and a letter concerning EPA's preferred alternative are attached.
158. Letter to Mr. Stanley Laskowki [sic], U.S. EPA, from Mr. Matthew R. Zarkos, re: Concern about the radiation contamination problem, 7/11/93. P. 500227-500227.
159. Letter to Mr. Stanley Laskowski, U.S. EPA, from Ms. Ann Marie and Ms. Winifred Finn and families, re: Concern about the radiation contamination problem, 7/11/93. P. 500228-500228.
160. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Werner and Ms. Susanna Koethe, re: Disapproval of EPA's preferred alternative, 7/12/93. P. 500229-500229.
161. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Catherine F. Murray, re: Disapproval of EPA's preferred alternative, 7/12/93. P. 500230-500230.
162. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Barbara DiPietro, re: Disapproval of EPA's preferred alternative, 7/12/93. P. 500231-500231.
163. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. John Hetherington, re: Disapproval of EPA's preferred alternative, 7/12/93. P. 500232-500232.
164. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Helen R. Bowes, re: Disapproval of EPA's preferred alternative, 7/12/93. P. 500233-500233.
165. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Ana Fong, re: Disapproval of EPA's preferred alternative, 7/12/93. P. 500234-500234.
166. Letter to Mr. Stanley Laskowski, U.S. EPA, from Mrs. Alice C. Borowik, re: Concern about the radiation contamination problem, 7/12/93. P. 500235-500235.
167. Letter to Mr. Stanley Laskowski, U.S. EPA, from Mr. Keith B. McLennan, re: Concern about the radiation contamination problem, 7/12/93. P. 500236-500236.
168. Letter to Ms. Leanne Nurse, U.S. EPA, from Dr. Wilma Mitchell, re: Disapproval of EPA's preferred alternative, 7/12/93. P. 500237-500237.
169. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Joseph McMurray, re: Disapproval of EPA's preferred alternative, 7/12/93. P. 500238-500238.
170. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Gail K. Wheatley, re: Disapproval of EPA's preferred alternative, 7/12/93. P. 500239-500239.
171. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Thomas A. Wheatley, re: Disapproval of EPA's preferred alternative, 7/12/93. P. 500240-500240.

172. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. William A. Eberle, Jr., re: Disapproval of EPA's preferred alternative, 7/12/93. P. 500241-500241.
173. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Maureen C. Eberle, re: Disapproval of EPA's preferred alternative, 7/12/93. P. 500242-500242.
174. Letter to Mayor Rankin, Borough of Lansdowne, from Mr. James & Ms. Linda McElroy, re: Concern about housing values and relocating, 7/12/93. P.500243-500243.
175. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Ruth F. Rosser, re: Concern about residence destruction and no compensation, 7/12/93. P. 500244-500244.
176. Letter to Ms. Leanne Nurse, U.S. EPA, from The Reverend & Mrs. Paul Guthweebt [sic], re: Disapproval of EPA's preferred alternative, 7/13/93. P. 500245-500245.
177. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Linda R. Kauthe [sic], re: Disapproval of EPA's preferred alternative, 7/13/93. P. 500246-500246.
178. Letter to Mr. Stanley Laskowski, U.S. EPA, from Ms. Elayne Smith, re: Concern about the radiation contamination problem, 7/13/93. P. 500247-500247.
179. Letter to Mr. Stanley Laskowski, U.S. EPA, from Ms. Elayne Smith, re: Disapproval of EPA's preferred alternative, 7/13/93. P. 500248-500248.
180. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Elayne Smith, re: Concern about the radiation contamination problem, 7/13/93. P. 500249-500249.
181. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Elayne Smith, re: Disapproval of EPA's preferred alternative, 7/13/93. P. 500250-200250.
182. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. George Stom [sic], re: Disapproval of EPA's preferred alternative, 7/13/93. P. 500251-500251.
183. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Thomas J. O'Brien and Ms. Joan O'Brien, re: Disapproval of EPA's preferred alternative, 7/13/93. P. 500252-500252.
184. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Mark J. Du Frayne and Ms. Rosemary Du Frayne, re: Request for an extension of the official comment period to prepare a reasonable response to the proposed plan, 7/13/93. P. 500253-500253.
185. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Ed and Ms. Mary Beth Sherrier, re: Disapproval of EPA's preferred alternative, 7/13/93. P. 500254-500254.
186. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. William McGregor, re: Disapproval of EPA's preferred alternative, 7/14/93. P. 500255-500255.
187. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Glen Toll, re: Disapproval of EPA's preferred alternative, 7/14/93. P. 500256-500256.
188. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. William and Ms. Karen Koski, re: Disapproval of EPA's preferred alternative, 7/14/93. P. 500257-500257.
189. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. John F. Hughes, re: Disapproval of EPA's preferred alternative, 7/14/93. P. 500258-500258.
190. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Thomas McHugh and Family, re: Disapproval of EPA's preferred alternative, 7/14/93. P. 500259-500259.
191. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Eleanor S. MacMullen, re: Disapproval of EPA's preferred alternative, 7/14/93. P. 500260-500260.
192. Letter to Mr. Laskowski, U.S. EPA, from Mr. Robert M. Melendez [sic],

- re: Concern about the radiation contamination problem, 7/14/93. P. 500261-500261.
193. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Charles Kotze, re: Disapproval of EPA's preferred alternative, 7/14/93. P. 500262-500262.
  194. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. William Vanderbilt, re: Disapproval of EPA's preferred alternative, 7/14/93. P. 500263-500263.
  195. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Charles & Ms. Elizabeth Kotze, re: Disapproval of EPA's preferred alternative, 7/14/93. P. 500264-500264.
  196. Letter to Ms. Leanne Nurse, U.S. EPA, from Dr. and Mrs. Walter Engle, re: Disapproval of EPA's preferred alternative, 7/14/93. P. 500265-500265.
  197. Letter to Mr. Stanley Laskowski, U.S. EPA, from Dr. Lenwood B. Wert, re: List of concerns as to EPA's handling of the contamination problem, 7/14/93. P. 500266-500271. A letter regarding disapproval of EPA's handling of site actions and an article entitled "Case Crumbles in Weaver Trial" are attached.
  198. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. & Mrs. Michael Foschi, re: Disapproval of EPA's preferred alternative, 7/14/93. P. 500272-500273. A list of people who have received copies of the letter are attached.
  199. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Karen Dyslishi, re: Disapproval of EPA's preferred alternative, 7/15/93. P. 500274-500274.
  200. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Christine T. Burns, re: Disapproval of EPA's preferred alternative, 7/15/93. P. 500275-500275.
  201. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Joseph L. Vetter, re: Disapproval of EPA's preferred alternative, 7/15/93. P. 500276-500276.
  202. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Hollie and Mr. John Palo, re: Disapproval of EPA's preferred alternative, 7/15/93. P. 500277-500277.
  203. Letter to Ms. Leanne Nurse, U.S. EPA, from Mrs. Hilda M. Christman, re: Concern about the radiation contamination problem, 7/15/93. P. 500278-500278.
  204. Letter to Ms. Leanne Nurse, U.S. EPA, from Mrs. Hilda M. Christman, re: Disapproval of EPA's preferred alternative, 7/15/93. P. 500279-500279.
  205. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Carolyn Mooney, re: Disapproval of EPA's preferred alternative, 7/15/93. P. 500280-500280.
  206. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. John H. Bloom and Ms. Margery S. Bloom, re: Disapproval of EPA's preferred alternative, 7/15/93. P. 500281-500281.
  207. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Dorothea D. Cathill, re: Disapproval of EPA's preferred alternative, 7/15/93. P. 500282-500282.
  208. Letter to Mr. Stanley Laskowski, U.S. EPA, from Ms. Marie A. McCloskey, re: Concern about the radiation contamination problem, 7/15/93. P. 500283-500283.
  209. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Rodney F. Rafetto, Jr. and Family, re: Disappointment with the proposal concerning the remediation plan and response and comments to the proposed relocation action and remediation, 7/15/93. P. 500284-500288. A cover letter is attached.
  210. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Edward J. Niezgodka and Dannel J. Niezgodka, re: Disapproval of the remedy for the radiation contamination problem, 7/15/93. P. 500289-500289.
  211. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Gerard F. Dillon, re:

- Disapproval of EPA's preferred alternative, 7/15/93. P. 500290-500290.
212. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Richard and Ms. Virginia Goerlach, re: Disapproval of EPA's preferred alternative, 7/16/93. P. 500291-500291.
  213. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. & Mrs. Stephen Love, re: Disapproval of EPA's preferred alternative, 7/16/93. P. 500292-500292.
  214. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. William G. Ralston Jr. and Wife, re: Disapproval of EPA's preferred alternative, 7/16/93. P. 500293-500293.
  215. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. John A. O'Connor, re: Disapproval of EPA's preferred alternative, 7/16/93. P. 500294-500294.
  216. Letter to Ms. Leanne Nurse, U.S. EPA, from Mrs. Dawn Hogan, re: Disapproval of EPA's preferred alternative, 7/16/93. P. 500295-500295.
  217. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Michael P. Hogan, re: Disapproval of EPA's preferred alternative, 7/16/93. P. 500296-500296.
  218. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Michael and Ms. Kathleen Lion, re: Disapproval of EPA's preferred alternative, 7/16/93. P. 500297-500297.
  219. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Wayne W. Staulor [sic], re: Disapproval of EPA's preferred alternative, 7/16/93. P. 500298-500298.
  220. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Ray Sharrole [sic], re: Disapproval of EPA's preferred alternative, 7/16/93. P. 500299-500299.
  221. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Fred Travers, re: Disapproval of EPA's preferred alternative, 7/16/93. P. 500300-500300.
  222. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Thomas S. Bannon Jr., re: Disapproval of EPA's preferred alternative, 7/16/93. P. 500301-500301.
  223. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Mary Beth Kingston, re: Disapproval of EPA's preferred alternative, 7/16/93. P. 500302-500302.
  224. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. George and Ms. Joan March, re: Disapproval of EPA's preferred alternative, 7/16/93. P. 500303-500303.
  225. Letter to Ms. Leanne Nurse, U.S. EPA, from Mrs. Anne Thomas, re: Disapproval of EPA's preferred alternative, 7/16/93. P. 500304-500304.
  226. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Evelyn Robertson, re: Disapproval of EPA's preferred alternative, 7/16/93. P. 500305-500305.
  227. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. & Mrs. Boris Longin, re: Disapproval of EPA's preferred alternative, 7/16/93. P. 500306-500306.
  228. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Cindy and Mr. Frank Kirkman, re: Disapproval of EPA's preferred alternative, 7/16/93. P. 500307-500307.
  229. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Ellsworth and Ms. Elizabeth Van Arsdale, re: Disapproval of EPA's preferred alternative, 7/16/93. P. 500308-500308.
  230. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Katherine Chronaker and Mr. George Chronaker, re: Disapproval of EPA's preferred alternative, 7/16/93. P. 500309-500309.
  231. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Katherine Chronaker and Mr. George Chronaker, re: Concern about the radiation contamination problem, 7/16/93. P. 500310-500310.

232. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Frances Schultz, re:  
Disapproval of EPA's preferred alternative, 7/16/93. P. 500311-500311.
233. Letter to Ms. Leanne Nurse, U.S. EPA, from Mrs. Elizabeth H. Mullin,  
re: Disapproval of EPA's preferred alternative, 7/16/93. P. 500312-500312.
234. Letter to Ms. Leanne Nurse, U.S. EPA, from Mrs. D.S. Daley, re:  
Disapproval of EPA's preferred alternative, 7/16/93. P. 500313-500313.
235. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Brett Loper [sic], re:  
Disapproval of EPA's preferred alternative, 7/16/93. P. 500314-500314.
236. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. James M. Donovan, Jr.,  
re: Disapproval of EPA's preferred alternative, 7/16/93. P. 500315-500315.
237. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Walter S. Shultz [sic],  
Jr., re: Disapproval of EPA's preferred alternative, 7/16/93. P. 500316-500316.
238. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Ruth M. Palm, re:  
Disapproval of EPA's preferred alternative, 7/16/93. P. 500317-500317.
239. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Ruth T. Schwarz, re:  
Disapproval of EPA's preferred alternative, 7/16/93. P. 500318-500318.
240. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Joe & Ms. Shirlee  
Kelly, re: Disapproval of EPA's preferred alternative, 7/16/93. P. 500319-500319.
241. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Robert M. Boucher, re:  
Disapproval of EPA's preferred alternative, 7/16/93. P. 500320-500320.
242. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Patricia D. Dougherty,  
re: Disapproval of EPA's preferred alternative, 7/16/93. P. 500321-500321.
243. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Robert M. Boucher, re:  
Concern about the radiation contamination problem, 7/16/93. P. 500322-500322.
244. Letter to Ms. Leanne Nurse, U.S. EPA, from Neriv D'Andrea and Mr.  
Richard D'Andrea, re: Disapproval of EPA's preferred alternative,  
7/16/93. P. 500323-500323.
245. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. William and Ms. Barbara  
Hare, re: Disapproval of EPA's preferred alternative, 7/16/93. P. 500324-500324.
246. Letter to Ms. Leanne Nurse, U.S. EPA, from Mrs. Rose Trabocco, re:  
Disapproval of EPA's preferred alternative, 7/16/93. P. 500325-500325.
247. Letter to Ms. Leanne Nurse, U.S. EPA, from Pat Deeseey, re:  
Disapproval of EPA's preferred alternative, 7/16/93. P. 500326-500326.
248. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. William Stone, re:  
Disapproval of EPA's preferred alternative, 7/16/93. P. 500327-500327.
249. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Glen Luskzart, re:  
Disapproval of EPA's preferred alternative, 7/16/93. P. 500328-500328.
250. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. John A. Connor, re:  
Disapproval of EPA's preferred alternative, 7/16/93. P. 500329-500329.
251. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Charles H. Walter, re:  
Disapproval of EPA's preferred alternative, 7/16/93. P. 500330-500330.
252. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Gerald W. Zell [sic],  
re: Disapproval of EPA's preferred alternative, 7/16/93. P. 500331-500331.
253. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. & Mrs. James J.  
McElroy, re: Disapproval of EPA's preferred alternative, 7/16/93. P. 500332-500332.

254. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Sarah Gowan Sapsis, re: Disapproval of EPA's preferred alternative, 7/16/93. P. 500333-500333.
255. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. John J. Connell, re: Disapproval of EPA's preferred alternative, 7/16/93. P. 500334-500334.
256. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Stephen Putnelli [sic], re: Disapproval of EPA's preferred alternative, 7/16/93. P. 500335-500335.
257. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Michael Bradley, re: Disapproval of EPA's preferred alternative, 7/16/93. P. 500336-500336.
258. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Helena V. Stanley, re: Disapproval of EPA's preferred alternative, 7/16/93. P. 500337-500337.
259. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. & Mrs. Richard J. Hogg, re: Disapproval of EPA's preferred alternative, 7/16/93. P. 500338-500338.
260. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Nicholas J. Arone and Ms. Patricia L. Arone, re: Disapproval of EPA's preferred alternative, 7/16/93. P. 500339-500339.
261. Handwritten letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Maria George, re: Opposition to EPA's proposed plan Option #4, 7/16/93. P. 500340-500340.
262. Letter to Ms. Leanne Nurse, U.S. EPA, from I. David, re: Disapproval of EPA's preferred alternative, 7/17/93. P. 500341-500341.
263. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Janice Affonse Ellrich, re: Disapproval of EPA's preferred alternative, 7/17/93. P. 500342-500342.
264. Letter to Mr. Stanley Laskowski, U.S. EPA, from Ms. Karen A. Ulisniewski, re: Concern about the radiation contamination problem, 7/17/93. P. 500343-500343.
265. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Karen A. Ulisniewski, re: Concern about the radiation contamination problem, 7/17/93. P. 500344-500344.
266. Handwritten note to Ms. Leanne Nurse, U.S. EPA, from Mr. Jack & Ms. Theresa Morris, re: Disapproval of EPA's proposed plan for the cleanup of radium contaminated properties, 7/17/93. P. 500345-500345.
267. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Carol B. Blanning, re: Disapproval of EPA's preferred alternative, 7/18/93. P. 500346-500346.
268. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Inez C. Di Fabio, re: Disapproval of EPA's preferred alternative, 7/19/93. P. 500347-500347.
269. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Dorothy A. Dysleski, re: Disapproval of EPA's preferred alternative, 7/19/93. P. 500348-500348.
270. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. & Mrs. Eugene H. Finn, re: Disapproval of EPA's preferred alternative, 7/19/93. P. 500349-500349.
271. Public Hearing Transcript, Austin Avenue Radiation Superfund Site, 7/19/93. P. 500350-500602. A transmittal letter is attached.
272. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. & Mrs. Gerald Giannattasio, re: Disapproval of EPA's preferred alternative, 7/19/93. P. 500603-500603.
273. Letter to Mr. Stanley Laskowski, U.S. EPA, from Mr. John Connelly, re: Disapproval of EPA's preferred alternative, 7/19/93. P. 500604-500605.
274. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Douglas Z. Hall, re: Disapproval of EPA's preferred alternative, 7/19/93. P. 500606-500606.

275. Letter to Ms. Leanne Nurse, U.S. EPA, from Mrs. Dolores B. Ward, re: Disapproval of EPA's preferred alternative, 7/19/93. P. 500607-500607.
276. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Samuel D. & Ms. Winifred F. Mitchell, re: Disapproval of EPA's preferred alternative, 7/19/93. P. 500608-500608.
277. Letter to Ms. Leanne Nurse, U.S. EPA, from R. Greenleaf, re: Disapproval of EPA's preferred alternative, 7/19/93. P. 500609-500609.
278. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Julia McDevitt, re: Disapproval of EPA's preferred alternative, 7/19/93. P. 500610-500610.
279. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Rhonda McJett, re: Disapproval of EPA's preferred alternative, 7/19/93. P. 500611-500611.
280. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Mark W. Goster, re: Disapproval of EPA's preferred alternative, 7/19/93. P. 500612-500612.
281. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. John Connelly, re: Disapproval of EPA's preferred alternative, 7/19/93. P. 500613-500614.
282. Letter to Mr. Stanley L. Laskowski, U.S. EPA, from Senator F. Joseph Loeper, Senate of Pennsylvania, re: Concern about EPA's preferred alternative of demolition and permanent relocation, 7/19/93. P. 500615-500615.
283. Letter to Ms. Leanne Nurse, U.S. EPA, from Mayor John J. Rankin, Jr., Borough of Lansdowne, re: Comments on the public meeting and the proposed remedial action alternative plans, 7/19/93. P. 500616-500620.
284. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Georgeanna Julianao, Greater Lansdowne Civic Association, re: Disapproval of EPA's preferred alternative, 7/19/93. P. 500621-500621.
285. Letter to The Honorable Nicholas A. Micozzie from Ms. Georgianna Grentzenberg, re: The radioactivity problem, disapproval of EPA's activities, and the poor quality of education in Lansdowne, 7/19/93. P. 500622-500622.
286. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Robert E. Bellwoar, re: Disapproval of EPA's preferred alternative, 7/20/93. P. 500623-500623.
287. Letter to Mr. Stanley Laskowski, U.S. EPA, from Mr. Samuel D. & Ms. Winifred F. Mitchell, re: Concern about the radiation contamination problem, 7/20/93. P. 500624-500624.
288. Letter to Mr. Stanley Laskowski, U.S. EPA, from Mr. Robert M. Boucher, re: Concern about the radiation contamination problem, 7/20/93. P. 500625-500625.
289. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Patricia Bellwoar, re: Disapproval of EPA's preferred alternative, 7/20/93. P. 500626-500626.
290. Letter to Mr. Victor Janosik, U.S. EPA, from Dr. Lenwood B. Wert, re: Disapproval of EPA's activities, 7/20/93. P. 500627-500635. A copy of the letter, a letter regarding the crisis situation in Lansdowne, and an article entitled "Shifting Dirt" are attached.
291. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Patricia A. Baltadonis and Mr. John V. Baltadonis, re: Disapproval of EPA's preferred alternative, 7/20/93. P. 500636-500636.
292. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. & Mrs. Thomas Colella, re: Disapproval of EPA's preferred alternative, 7/21/93. P. 500637-500637.
293. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Anne E. Moran, re: Disapproval of EPA's preferred alternative, 7/21/93. P. 500638-500638.



294. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Gloria J. Gicking, re: Disapproval of EPA's preferred alternative, 7/21/93. P. 500639-500639.
295. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Carolyn McKinney-Croix, re: Disapproval of EPA's preferred alternative, 7/21/93. P. 500640-500640.
296. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. & Mrs. Matthew DeMaria, re: Disapproval of EPA's preferred alternative, 7/21/93. P. 500641-500641.
297. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Sarah Rossi, re: Disapproval of EPA's preferred alternative, 7/21/93. P. 500642-500642.
298. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Rosemary West, re: Disapproval of EPA's preferred alternative, 7/21/93. P. 500643-500643.
299. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Joan H. Graham, re: Disapproval of EPA's preferred alternative, 7/21/93. P. 500644-500644.
300. Letter to Ms. Leanne Nurse, U.S. EPA, from Dr. Blair Holl, re: Disapproval of EPA's preferred alternative, 7/21/93. P. 500645-500645.
301. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Christopher J. Harin, re: Disapproval of EPA's preferred alternative, 7/21/93. P. 500646-500646.
302. Letter to Ms. Leanne Nurse, U.S. EPA, from Mrs. Edith Bootner, re: Disapproval of EPA's preferred alternative, 7/21/93. P. 500647-500647.
303. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Donna & Mr. Kenneth O'Brien, re: Disapproval of EPA's preferred alternative, 7/21/93. P. 500648-500648.
304. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. William P. Lewis, Vacuums Reconditioned, re: Disapproval of EPA's preferred alternative, 7/21/93. P. 500649-500649.
305. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. James R. Achuff, re: Disapproval of EPA's preferred alternative, 7/22/93. P. 500650-500650.
306. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Robert J. Jones and Ms. Michele J. Pressley-Jones, re: Disapproval of EPA's preferred alternative, 7/22/93. P. 500651-500651.
307. Letter to President Bill Clinton from Mr. Jim and Ms. Linda McElroy, re: Concerns surrounding EPA's decision to demolish homes because of radiation contamination, 7/22/93. P. 500652-500653.
308. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Lucille T. Fisher, re: Disapproval of EPA's preferred alternative, 7/23/93. P. 500654-500654.
309. Letter to Ms. Leanne Nurse, U.S. EPA, from Shankar P. Barua, re: Disapproval of EPA's preferred alternative, 7/23/93. P. 500655-500655.
310. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. & Mrs. Edward C. Wonell, re: Disapproval of EPA's preferred alternative, 7/23/93. P. 500656-500656.
311. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Ken & Ms. Edith Sielsch, re: Disapproval of EPA's preferred alternative, 7/23/93. P. 500657-500657.
312. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. & Mrs. James Bernstein, re: Disapproval of EPA's preferred alternative, 7/23/93. P. 500658-500658.
313. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Stephen & Ms. Colleen McKenna, re: Disapproval of EPA's preferred alternative, 7/23/93. P. 500659-500659.
314. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Richard L. Ziegler, re: Disapproval of EPA's preferred alternative, 7/23/93. P. 500660-500660.

315. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Anne Cranmer [sic], re: Disapproval of EPA's preferred alternative, 7/23/93. P. 500661-500661.
316. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Florence [sic] Thomas, re: Disapproval of EPA's preferred alternative, 7/23/93. P. 500662-500662.
317. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Dorothy Morgan, re: Disapproval of EPA's preferred alternative, 7/23/93. P. 500663-500663.
318. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Stephen J. Scalia, re: Disapproval of EPA's preferred alternative, 7/23/93. P. 500664-500664.
319. Letter to Ms. Leanne Nurse, U.S. EPA, from A. Noble and D. Noble, re: Disapproval of EPA's preferred alternative, 7/23/93. P. 500665-500665.
320. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Catherine M. Foley, re: Disapproval of EPA's preferred alternative, 7/23/93. P. 500666-500666.
321. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Claire & Mr. Sam Schmick, re: Disapproval of EPA's preferred alternative, 7/23/93. P. 500667-500667.
322. Letter to Ms. Leanne Nurse, U.S. EPA, from (sender's signature illegible), re: Disapproval of EPA's preferred alternative, 7/23/93. P. 500668-500668.
323. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Donald J. DiPaslo, re: Disapproval of EPA's preferred alternative, 7/23/93. P. 500669-500669.
324. Letter to Ms. Leanne Nurse, U.S. EPA, from Dr. Thomas W. Murphy and Dr. Norman M. Shanfeld, Murphy-Shanfeld P.C., re: Disapproval of EPA's preferred alternative, 7/23/93. P. 500670-500670.
325. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Charles Berner, re: Disapproval of EPA's preferred alternative, 7/23/93. P. 500671-500671.
326. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. & Mrs. Poorman, re: Disapproval of EPA's preferred alternative, 7/23/93. P. 500672-500672.
327. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. John Graham, re: Disapproval of EPA's preferred alternative, 7/23/93. P. 500673-500673.
328. Letter to Ms. Leanne Nurse, U.S. EPA, from Mrs. Betty Zilius, re: Disapproval of EPA's preferred alternative, 7/23/93. P. 500674-500674.
329. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Carolyn D. Loeliger, re: Disapproval of EPA's preferred alternative, 7/23/93. P. 500675-500675.
330. Letter to Ms. Leanne Nurse, U.S. EPA, from (sender's signature illegible), re: Disapproval of EPA's preferred alternative, 7/23/93. P. 500676-500676.
331. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Christina Tabbert, re: Disapproval of EPA's preferred alternative, 7/23/93. P. 500677-500677.
332. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. John & Ms. Marge Rossi, re: Disapproval of EPA's preferred alternative, 7/23/93. P. 500678-500678.
333. Letter to Mr. Stanley Laskowski, U.S. EPA, from Shankar P. Barua and Ms. Lucille T. Fisher, re: Concern about the radiation contamination problem, 7/23/93. P. 500679-500679.
334. Letter to Mr. Stanley Laskowski, U.S. EPA, from Ms. Florence K. Noll, re: Concern about the radiation contamination problem, 7/23/93. P. 500680-500680.
335. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. George W. Snyder and Ms. Catherine M. Snyder, re: Disapproval of EPA's preferred alternative, 7/23/93. P. 500681-500681.

336. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Walter and Ms. Florence Batog, re: Disapproval of EPA's preferred alternative, 7/23/93. P. 500682-500682.
337. Letter to Mr. Stanley Laskowski, U.S. EPA, from Mr. David D. and Ms. E. Susan Pollock, re: Concern about the radiation contamination problem, 7/23/93. P. 500683-500683.
338. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Susan Hill, re: Disapproval of EPA's preferred alternative, 7/23/93. P. 500684-500684.
339. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Margaret M. Devaney, re: Disapproval of EPA's preferred alternative, 7/23/93. P. 500685-500685.
340. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Scott & Ms. Mary Beth Olens, re: Disapproval of EPA's preferred alternative, 7/23/93. P. 500686-500686.
341. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Gladys M. Griffis, re: Disapproval of EPA's preferred alternative, 7/23/93. P. 500687-500687.
342. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Alicia Lee Scott, re: Disapproval of EPA's preferred alternative, 7/23/93. P. 500688-500688.
343. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. John G. Kowalski, re: Disapproval of EPA's preferred alternative, 7/23/93. P. 500689-500689.
344. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Jane D. Sheeran, re: Disapproval of EPA's preferred alternative, 7/23/93. P. 500690-500690.
345. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Wendy C. Sheeran, re: Disapproval of EPA's preferred alternative, 7/23/93. P. 500691-500691.
346. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Sarah M. Gilronan and Mr. James J. Gilronan, re: Disapproval of EPA's preferred alternative, 7/23/93. P. 500692-500692.
347. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Emily M. Leonard and Mr. Matthew B. Leonard, re: Disapproval of EPA's preferred alternative, 7/23/93. P. 500693-500693.
348. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Ellen Marie Cassidy, re: Disapproval of EPA's preferred alternative, 7/23/93. P. 500694-500694.
349. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Diane Dibeli, re: Disapproval of EPA's preferred alternative, 7/23/93. P. 500695-500695.
350. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Norman E. Kleinberg and Ms. Margaret S. Kleinberg, re: Disapproval of EPA's preferred alternative, 7/23/93. P. 500696-500696.
351. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. David D. Pollock and Ms. E. Susan Pollock, re: Disapproval of EPA's preferred alternative, 7/23/93. P. 500697-500697.
352. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Mary S. Forrest, re: Disapproval of EPA's preferred alternative, 7/23/93. P. 500698-500698.
353. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Nicholas F. Meloni and Ms. Kathleen A. Meloni, re: Disapproval of EPA's preferred alternative, 7/23/93. P. 500699-500699.
354. Handwritten letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Lucille K. Stickler, re: Comments on the issues discussed at the public meeting, 7/23/93. P. 500700-500701.
355. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Chris P. Felten, re: Disapproval of EPA's preferred alternative, 7/23/93. P. 500702-500702.

356. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Dorothy A. Rice, re: Disapproval of EPA's preferred alternative, 7/26/93. P. 500703-500703.
357. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Ann M. Boyd,- re: Disapproval of EPA's preferred alternative, 7/26/93. P. 500704-500704.
358. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Carol Underwood, re: Disapproval of EPA's preferred alternative, 7/26/93. P. 500705-500705.
359. Letter to Ms. Leanne Nurse, U.S. EPA, from Mrs. Alice C. Borowik, re: Disapproval of EPA's preferred alternative, 7/26/96. P. 500706-500706.
360. Letter to Mr. Stanley Laskowski, U.S. EPA, from Ms. Dorothy A. Rice, re: Concern about the radiation contamination problem, 7/26/93. P. 500707-500707.
361. Handwritten letter to The Honorable Robert P. Casey, State of Pennsylvania, from Mr. Yousuf A. Haq, re: Request for assistance with the cleanup of radium contaminated properties and the reconstruction of homes, 7/26/93. P. 500708-500709.
362. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Carol Spelkoman, re: Disapproval of EPA's preferred alternative, 7/26/93. P. 500710-500710.
363. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Patricia E. Kirlin and Mr. George G. Kirlin, re: Disapproval of EPA's preferred alternative, 7/27/93. P. 500711-500711.
364. Letter to Mr. Stanley Laskowski, U.S. EPA, from Mr. George P. Kirlin and Ms. Patricia E. Kirlin, re: Disapproval of EPA's preferred alternative, 7/27/93. P. 500712-500712.
365. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Florence Piazza, re: Disapproval of EPA's preferred alternative, 7/27/93. P. 500713-500713.
366. Letter to Mr. Stanley Laskowski, U.S. EPA, from Mr. & Mrs. Fred Canale, re: Concern about the radiation contamination problem, 7/27/93. P. 500714-500714.
367. Letter to Mr. Stanley Laskowski, U.S. EPA, from Mr. & Mrs. G.A. Mossley, re: Disapproval of EPA's preferred alternative, 7/27/93. P. 500715-500715.
368. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Chris P. Felten, re: Disapproval of EPA's preferred alternative, 7/27/93. P. 500716-500717.
369. Letter to Ms. Leann [sic] Nurse, U.S. EPA, from Mr. Nashid Ali and The Collins-Ali Family, re: Concerns about the value of life around the Austin Avenue Radiation Site, 7/27/93. P. 500718-500720. A letter to President Clinton regarding setting standards for global cleanup and environmental protection is attached.
370. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Geraldine C. Laws, re: Disapproval of EPA's preferred alternative, 7/28/93. P. 500721-500721.
371. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Howard L. Haines, re: Disapproval of EPA's preferred alternative, 7/28/93. P. 500722-500722.
372. Letter to Mr. Stanley Laskowski, U.S. EPA, from Mr. Howard L. Haines, re: Disapproval of EPA's preferred alternative, 7/28/93. P. 500723-500723.
373. Letter to Mr. Stanley Laskowski, U.S. EPA, from Ms. Geraldine C. Laws, re: Disapproval of EPA's preferred alternative, 7/28/93. P. 500724-500724.
374. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Nashid Ali, re: Request for Superfund help to safely relocate Mr. Ali and his family away from the site, 7/28/93. P. 500725-500726.
375. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Dorothy B. Ziegler, re:

- Request to be relocated as soon as possible, 7/28/93. P. 500727-500727.
376. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Richard and Ms. Marie Harbaugh, re: Disapproval of EPA's preferred alternative, 7/29/93. P. 500728-500728.
  377. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Thomas & Ms. Susan Gross, re: Disapproval of EPA's preferred alternative, 7/29/93. P. 500729-500729.
  378. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. & Mrs. James J. Doyle, re: Disapproval of EPA's preferred alternative, 7/30/93. P. 500730-500730.
  379. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Nashid Ali, re: Comments on the proposed plan, 7/30/93. P. 500731-500732.
  380. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Audrey Blue, re: Disapproval of EPA's preferred alternative, 8/2/93. P. 500733-500733.
  381. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Emeraldal DiRenzo, re: Disapproval of EPA's preferred alternative, 8/4/93. P. 500734-500734.
  382. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Emeraldal DiRenzo, re: Concern about the radiation contamination problem, 8/4/93. P. 500735-500736.
  383. Letter to The Honorable W. Curtis Weldon, House of Representatives, from Mr. Michael F.X. Coll, re: Issues surrounding the Lansdowne community, 8/5/93. P. 500737-500738.
  384. Letter to Mr. Stanley Loskowski [sic], U.S. EPA, from Mr. Stephen E. Andrien, re: Questions concerning the proposal for temporary housing, 8/6/93. P. 500739-500745. A signed petition regarding the objection to any and all expansion and/or addition to the business currently operating and known as "Nova Gardens Inc." is attached.
  385. Letter to Ms. Leanne Nurse, U.S. EPA, from Dr. Lenwood B. Wert, re: Proof of health threats to the public contained in the properties in Lansdowne, 8/6/93. P. 500746-500746.
  386. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Thomas F. Wynne, Jr., re: Disapproval of EPA's preferred alternative, 8/7/93. P. 500747-500748.
  387. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Susan Keller, re: Concern about the radiation contamination and EPA cleanup taking place, 8/9/93. P. 500749-500749.
  388. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Barbara Vinnacombe, re: Request for Option #3 to be made available to all houses, 8/10/93. P. 500750-500750.
  389. Meeting Minutes, 8/11/93. P. 500751-500756. An Attendance Register is attached.
  390. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Nancy Powell and Mr. Gerald E. Connelly, re: Request to have EPA reconstruct new homes, 8/20/93. P. 500757-500757.
  391. Handwritten letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Charles & Ms. Irene Rovane, re: Disapproval of EPA's preferred alternative, 8/23/93. P. 500758-500759.
  392. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. & Mrs. J. Warren Bullen, Jr., re: Disapproval of EPA's preferred alternative, 8/24/93. P. 500760-500760.
  393. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Ann Marie Finn, Mr. Michael F. Finn, Ms. Winifred P. Finn, and Ms. Kathleen Finn, re: Disapproval of EPA's preferred alternative, 8/24/93. P. 500761-500761.
  394. Letter to Ms. Nurse, U.S. EPA, from Mr. Joseph, Mr. Kevin, and Ms.

Barbara Quinn, re: Disapproval of EPA's preferred alternative,  
8/24/93. P. 500762-500762.

395. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Harrison W. App, re: Opposition to EPA's preferred alternative, 8/24/93. P. 500763-500763.
396. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Jeffrey Miller, re: Request for Option #3 as an overall solution to Lansdowne's radiation problem, 8/24/93. P. 500764-500764.
397. Handwritten letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Eileen Rudisill, re: Request for Option #3 as the only viable option, 8/24/93. P. 500765-500765.
398. Letter to Mr. Stanley Laskowski, U.S. EPA, from Mr. Curt Weldon, Senator Arlen Specter, Senator Harris Wofford, Mr. Thomas Foglietta, and Mr. Lucien Blackwell, Congress of the United States, re: Comments on the preferred options, 8/24/93. P. 500766-500768. A letter regarding EPA's consideration of all comments received is attached.
399. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Mark J. Du Frayne and Ms. Rosemary Du Frayne, re: Disapproval of EPA's preferred alternative, 8/25/93. P. 500769-500770.
400. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Joanne and Mr. John Covert, re: Disapproval of EPA's preferred alternative, 8/25/93. P. 500771-500771.
401. Letter to Ms. Leanne Nurse, U.S. EPA, from F.D. Hennessy, Jr., re: Disapproval of EPA's preferred alternative, 8/26/93. P. 500772-500772.
402. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Eileen A. Rudisill, re: Disapproval of EPA's preferred alternative, 8/26/93. P. 500773-500773.
403. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Martin J. Malone, Ms. Isabel-Lee Malone, and Ms. Isabel M. Malone, re: Disapproval of EPA's preferred alternative, 8/26/93. P. 500774-500774.
404. Handwritten letter to Ms. Leanne Nurse, U.S. EPA, from Mr. John & Ms. Gloria Carpenter, re: Request for homes to be rebuilt after the EPA cleanup is performed, 8/26/93. P. 500775-500775.
405. Letter to Ms. Leanne Nurse, U.S. EPA, from The Committee for a Radium Free Delaware Valley, re: Petitions gathered to support Option #3 for rebuilding homes, 8/26/93. P. 500776-500957. The petitions are attached.
406. Letter to Mr. Victor Janosik, U.S. EPA, from Mr. Lewin B. Barringer, re: Rejection of the proposal to demolish houses without compensation, 8/27/93. P. 500958-500958.
407. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. George N. Barton, re: Disapproval of EPA's preferred alternative, 8/27/93. P. 500959-500959.
408. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Mildred M. Missanelli, re: Disapproval of EPA's preferred alternative, 8/27/93. P. 500960-500960.
409. Letter to Ms. Leanne Nurse, U.S. EPA, from Mrs. Patricia Bellwoar and Mr. Robert E. Bellwoar, re: List of events in the Bellwoar's lives relating to the radiation contamination, 8/29/93. P. 500961-500966.
410. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Maureen J. Davis, re: Disapproval of EPA's preferred alternative, 9/2/93. P. 500967-500967.
411. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Joseph & Ms. Diane Bartley, re: Disapproval of EPA's preferred alternative, 9/8/93. P. 500968-500968.
412. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. & Mrs. Kenneth M. Delcamp, re: Disapproval of EPA's preferred alternative, 9/8/93. P. 500969-500969.

413. Letter to Mr. Stanley Laskowski, U.S. EPA, from Ms. Kristin Yoerg, re: Concern about the radiation contamination problem, 9/8/93. P. 500970-500970.
414. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Suzanne G. Marti, re: Disapproval of EPA's preferred alternative, 9/8/93. P. 500971-500971.
415. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. William J. Soomio [sic], re: Disapproval of EPA's preferred alternative, 9/9/93. P. 500972-500972.
416. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Patricia Dean, re: Disapproval of EPA's preferred alternative, 9/9/93. P. 500973-500973.
417. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Bette Lord, re: Disapproval of EPA's preferred alternative, 9/9/93. P. 500974-500974.
418. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Mildred Rogel, re: Disapproval of EPA's preferred alternative, 9/9/93. P. 500975-500975.
419. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Jessica Weir, re: Disapproval of EPA's preferred alternative, 9/20/93. P. 500976-500976.
420. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Kathleen L. Hammond, re: Disapproval of EPA's preferred alternative, 9/20/93. P. 500977-500977.
421. Letter to Ms. Leanne Nurse, U.S. EPA, from Ene L. Marzano, re: Disapproval of EPA's preferred alternative, 9/20/93. P. 500978-500978.
422. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. John Hammond, re: Disapproval of EPA's preferred alternative, 9/20/93. P. 500979-500979.
423. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Mildred Greenwood, William Penn School District, re: Support for Option #3, 9/21/93. P. 500980-500980.
424. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Kimberly A. DeHaven, re: Disapproval of EPA's preferred alternative, 9/28/93. P. 500981-500981.
425. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. John J. Kelly, Sr., re: Disapproval of EPA's preferred alternative, 9/28/93. P. 500982-500982.
426. Letter to Ms. Leanne Nurse, U.S. EPA, from Mrs. John Kelly, re: Disapproval of EPA's preferred alternative, 9/28/93. P. 500983-500983.
427. Letter to Mr. Stanley L. Laskowski, U.S. EPA, from Mr. Robert P. Frank, Buchanan Ingersoll, re: Recommendation of Option #3, 10/22/93. P. 500984-500987. A letter regarding choosing Option #3 is attached.
428. Letter to Mr. Stanley L. Laskowski, U.S. EPA, from Mr. Leon E. Kleckner and Ms. Agnes Kleckner, re: Opposition to demolishing homes, (undated). P. 500988-500988.
429. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Edward J. Stanislow and Ms. Jacqueline Stanislow, re: Disapproval to EPA's preferred alternative, (undated). P. 500989-500990.
430. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Judith R. Pearsall, re: Request to implement Option #3, (undated). P. 500991-500991.
431. Handwritten letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Barbara Lord, re: Questions on funding for Lansdowne, (undated). P. 500992-500992.
432. Handwritten letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Barbara J. Monroe, re: Disapproval of EPA's preferred alternative, (undated). P. 500993-500994.
433. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Catherine A. Vitti, re: Disapproval of EPA's preferred alternative, (undated). P. 500995-500996. A handwritten letter regarding EPA's job of

decontaminating the site is attached.

434. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Marianne Mercughano Glanzman, re: Disapproval of EPA's preferred alternative, (undated). P. 500997-500998. Handwritten comments regarding EPA's handling of the cleanup are attached.
435. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Joseph P. McGuire, re: Disapproval of EPA's preferred alternative, (undated). P. 500999-501000.
436. Letter to Ms. Leanne Nurse, U.S. EPA, from Mrs. Julie R. Gardenir, re: Disapproval of EPA's preferred alternative, (undated). P. 501001-501001.
437. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Stephen McManus, re: Disapproval of EPA's preferred alternative, (undated). P. 501002-501002.
438. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Joseph and Ms. Regina Milano, re: Disapproval of EPA's preferred alternative, (undated). P. 501003-501003.
439. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Charlie and Ms. Joan Lobb, re: Disapproval of EPA's preferred alternative, (undated). P. 501004-501004.
440. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. and Mrs. Joseph Woolten, re: Disapproval of EPA's preferred alternative, (undated). P. 501005-501005.
441. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Eric Mark Roger, re: Disapproval of EPA's preferred alternative, (undated). P. 501006-501006.
442. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Charles and Ms. Diane Vallaw, re: Disapproval of EPA's preferred alternative, (undated). P. 501007-501007.
443. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Paul and Ms. Debra Murtaugh, re: Disapproval of EPA's preferred alternative, (undated). P. 501008-501008.
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768. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Karen Aulianiewski, re: Disapproval of EPA's preferred alternative, (undated). P. 501334-501334.
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786. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. David A. Biche, Custom Construction, re: Disapproval of EPA's preferred alternative, (undated). P. 501352-501352.
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788. Letter to Ms. Leanne Nurse, U.S. EPA, from Mrs. Lora McEvoy, re: Disapproval of EPA's preferred alternative, (undated). P. 501354-501354.
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790. Letter to Mr. Stanley Laskowski, U.S. EPA, from Mr. Charles Procal, re: Concern about the radiation contamination problem, (undated). P. 501356-501356.
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811. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. John Schiller, re:  
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812. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Barbara Edwards, re:  
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813. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Virginia S. Huntsinger,  
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821. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. John and Ms. Maryrae  
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833. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Lou and Ms. Katharine Farese, re: Disapproval of EPA's preferred alternative, (undated). P. 501399-501399.
834. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Walter and Ms. Mary Merrill, re: Disapproval of EPA's preferred alternative, (undated). P. 501400-501400.
835. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Yvonne H. Adams, re: Disapproval of EPA's preferred alternative, (undated). P. 501401-501401.
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837. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Edward W. and Ms. Viola M. Cox, re: Disapproval of EPA's preferred alternative, (undated). P. 501403-501403.
838. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Holland M. Cerbs, re: Disapproval of EPA's preferred alternative, (undated). P. 501404-501404.
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840. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Suzanne L. Pinto, re: Disapproval of EPA's preferred alternative, (undated). P. 501406-501406.
841. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Stephen and Ms. Colleen McKenna, re: Disapproval of EPA's preferred alternative, (undated). P. 501407-501407.
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851. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Ruth H. Flannery, re:

- Disapproval of EPA's preferred alternative, (undated). P. 501417-501417.
852. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Ruth H. Flannery, re:  
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853. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Nancy Catallo, re:  
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854. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Tom and Ms. Ann  
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855. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Suzanne H. Smart, re:  
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856. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. and Mrs. Fred Canale,  
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857. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Lindsay S. Crosby, re:  
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858. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Denise T. Jones, re:  
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859. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. William Davis, re:  
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861. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Rachel Evans, re:  
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862. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Dorothy S. Carberry,  
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863. Letter to Ms. Leanne Nurse, U.S. EPA, from (sender's signature  
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864. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Anna R. Warren, re:  
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865. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Frank Glorard, re:  
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866. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. John Slatheny, re:  
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867. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. George and Ms. Ruth  
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868. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Robert and Ms.  
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871. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. John R. Schiller, re:  
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872. Letter to Ms. Leanne Nurse, U.S. EPA, from Michael G. O'Mossey, re:  
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873. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Joseph J. and Ms.

- Catherine A. Lawless, re: Disapproval of EPA's preferred alternative, (undated). P. 501439-501439.
874. Letter to Ms. Leanne Nurse, U.S. EPA, from Mrs. Frances K. Spence, re: Disapproval of EPA's preferred alternative, (undated). P. 501440-501440.
875. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Al and Ms. Amy Tielmans, re: Disapproval of EPA's preferred alternative, (undated). P. 501441-501441.
876. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Charles W. Glotfelty, re: Disapproval of EPA's preferred alternative, (undated). P. 501442-501442.
877. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Margaret Mullery, re: Disapproval of EPA's preferred alternative, (undated). P. 501443-501443.
878. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Robert E. and Ms. Elizabeth L. Brumbaugh, re: Disapproval of EPA's preferred alternative, (undated). P. 501444-501444.
879. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Mary Gouse, re: Disapproval of EPA's preferred alternative, (undated). P. 501445-501445.
880. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. William J. Dyle, re: Disapproval of EPA's preferred alternative, (undated). P. 501446-501446.
881. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Josephine Caulfield, re: Disapproval of EPA's preferred alternative, (undated). P. 501447-501447.
882. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Dolores Benner, re: Disapproval of EPA's preferred alternative, (undated). P. 501448-501448.
883. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. Antonio S. and Ms. Janet Vitello and Children, re: Disapproval of EPA's preferred alternative, (undated). P. 501449-501449.
884. Letter to Ms. Leanne Nurse, U.S. EPA, from Mr. John and Ms. Anita Anderson, re: Disapproval of EPA's preferred alternative, (undated). P. 501450-501450.
885. Letter to Ms. Leanne Nurse, U.S. EPA, from Ms. Betty Jane Schaeffer, re: Disapproval of EPA's preferred alternative, (undated). P. 501451-501451.
886. Article entitled "Off-the-shelf bugs hungrily gobble our nastiest pollutants," written by Mr. James D. Snyder, (undated). P. 501452-501453.
887. U.S. EPA Public Notice entitled "EPA Releases the Revised Proposed Remedial Action Plan for the Austin Avenue Radiation Superfund Site," 2/28/94. P. 501454-501454.
888. Transcript of public meeting, Austin Avenue Radiation Site, 3/15/94. P. 501455-501489. A cover letter is attached.
889. U.S. EPA Public Notice entitled "EPA Modifies the Revised Proposed Plan for the Austin Avenue Radiation Superfund Site," (undated). P. 301490-301490.

#### SITE SPECIFIC GUIDANCE DOCUMENTS INCLUDED

1. Memorandum to Region I, IV, V, VII, and VIII Waste Management Division Directors; Region II Emergency and Remedial Response Division Director; Region III, VI, and IX Hazardous Waste Management Division Directors; and Region X Hazardous Waste Division Director, U.S. EPA, from Mr. Don R. Clay, U.S. EPA, re: The role of Baseline Risk Assessments in Superfund remedy selection decisions, 4/22/91. OSWER 9355.0-30
2. Memorandum to Radiation Program Managers from Mr. William J. Gunter, U.S. EPA, re: Radium cleanup guidance, 4/16/92. A report entitled "Relationship Between Radium Concentration Levels in Soil and Radon Transport Through Soils into Homes" and a report entitled "Cleanup Standards for Radium Contaminated Soils" are attached.
3. Technical Support Document for the 1992 Citizen's Guide to Radon, prepared by U.S. EPA, 5/92. EPA 400-R-92-001
4. A Citizen's Guide to Radon (Second Edition), The Guide to Protecting Yourself and Your Family from Radon, prepared by U.S. EPA, U.S. Department of Health, and U.S. Public Health Service, 5/92.
5. Federal Register, Part II, Standards for Remedial Action at Inactive Uranium Processing Sites, 1/5/93.
6. Letter to Interested Party from Mr. Gerald P. Nichols and Mr. Henry Powsner, New Jersey Department of Environmental Protection and Energy, re: Subchapter II of the Radiation Protection Code, N.J.A.C. 7:28, 1/20/93. The subchapter is attached.

#### BIBLIOGRAPHY OF SITE SPECIFIC GUIDANCE DOCUMENTS

1. Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA, prepared by OSWER/OERR, 10/1/88. OSWER #9355.3-01
2. CERCLA Compliance With Other Environmental Statutes, prepared by J.W. Porter/OSWER, 10/2/85. OSWER #9234.0-2
3. CERCLA Compliance With Other Laws Manual (Draft), prepared by OERR, 8/8/88. OSWER #9234.1-01
4. CERCLA Compliance With Other Laws Manual Part II: Clean Air Act and Other Environmental Statutes and State Requirements, prepared by OERR, 8/1/89. OSWER #9234.1-02
5. Superfund Exposure Assessment Manual, prepared by OERR, 4/1/88. OSWER #9285.5-1
6. Superfund Public Health Evaluation Manual, prepared by OERR and OSWER, 10/1/86. OSWER #9285.4-1
7. Toxicology Handbook, prepared by Life Systems, Inc., T.E. Tyburski, and OWPE, 8/1/85. OSWER #9850.2
8. Community Relations in Superfund: A Handbook (Interim Version, prepared by OERR, 6/1/88. OSWER #9230.0-03B
9. A Guide to Selecting Superfund Remedial Actions, prepared by OERR/HSCD, 4/1/90. OSWER #9355.0-27FS