

#### **4.0 REMOVAL ACTION JUSTIFICATION**

The NCP states that an appropriate removal action may be conducted at a site when a threat to human health or welfare or the environment is identified.

- The removal action is undertaken to abate, prevent, minimize, stabilize, mitigate, or eliminate the release or the threat of a release at a site.
- Section 300.415(b)(2)(i-viii) of the NCP outlines eight factors to be considered when determining the appropriateness of a removal action.
- The applicable factors are outlined below and provide justification for completing the removal action, if required.

<b>Factor</b>	<b>Site Condition</b>	<b>Justification</b>
1) Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants	Arsenic, see Appendix A	Yes
2) Actual or potential contamination of drinking water supplies or sensitive ecosystems	Unnamed Tributary to Onion Creek	Yes
3) Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release.	None located at the site.	No
4) High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface that may migrate	Arsenic	Yes
5) Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released	Heavy rain or rain on snow events	Yes
6) Threat of fire or other explosion	None	No
7) The availability of other appropriate federal or state response mechanisms to respond to the release	N/A	No
8) Other situations or factors that may pose threats to public health or welfare of the United States or the environment	None	No