REVISION 0

FEDERAL ON-SCENE COORDINATOR'S REPORT COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY ACT REMOVAL ACTION AT THE SOUTH BEND LATHE SITE SOUTH BEND, ST. JOSEPH COUNTY, INDIANA SITE ID: B5GB

Prepared for:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region V Emergency Response Branch 77 W. Jackson Boulevard Chicago, Illinois 60604

Prepared by:

WESTON SOLUTIONS, INC. 20 N. Wacker Drive Suite 1210 Chicago, Illinois 60606

Date Prepared:
TDD Number:
Document Control Number:
Contract Number:
WESTON START Project Manager:
Telephone Number:
U.S. EPA On-Scene Coordinator:

November 12, 2007 S05-0003-0706-011 216-2A-ABFB EP-S5-06-04 Sarah Meyer (312) 424-3300 Kenneth Theisen

REVISION 0 FEDERAL ON-SCENE COORDINATOR'S REPORT COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION AND LIABILITY ACT REMOVAL ACTION AT THE SOUTH BEND LATHE SITE SOUTH BEND, ST. JOSEPH COUNTY, INDIANA SITE ID: B5GB

Prepared for:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region V Emergency Response Branch 77 W. Jackson Boulevard Chicago, Illinois 60604

Prepared by:

WESTON SOLUTIONS, INC.

20 N. Wacker Drive Suite 1210 Chicago, Illinois 60606

Prepared by:

Jay Rauh, WESTON START Site Lead

Reviewed and Approved by:

nde Dayler

Date:

Date:

Pamela Bayles, WESTON START Program Manager

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION V

DATE: November 15, 2007

SUBJECT: ON-SCENE COORDINATOR'S REPORT – CERCLA Removal Action at the South Bend Lathe Site, South Bend, St. Joseph County, Indiana, Site ID# B5GB

- **FROM:** Kenneth Theisen, On Scene Coordinator Emergency Response Branch, SE-5J
- TO: Linda Nachowicz, Chief Emergency Response Branch, S-6J

THROUGH: Michael Harris, Chief Division Superfund Section 2, SE-5J

Please find attached the United States Environmental Protection Agency (U.S. EPA) Federal On-Scene Coordinator's (OSC) Report for the removal action conducted at the South Bend Lathe Site (Site), South Bend, St. Joseph County, Indiana. This report follows the format outlined in the National Oil and Hazardous Substances Pollution Contingency Plan, 40 Code of Federal Regulations (CFR) 300.165. The removal was initiated on June 25, 2007, and was completed on August 3, 2007. The OSC for this Site was Mr. Kenneth Theisen.

U.S. EPA took this action to mitigate the threats posed by the presence of high levels of polychlorinated biphenyls (PCB) in transformers and oily waste at the Site, damaged and friable asbestos-containing material (ACM) debris on the floor and piping inside the building, and reactive and ignitable wastes in unlabeled containers, which posed an immediate threat to public health, welfare, and the environment. Total project costs under the control of the OSC are estimated at \$380,739 of which \$344,449 was for the Emergency and Rapid Response Services contractor.

In this report, any indications of specific costs incurred at the Site are only an approximation, subject to audit and final definitization by U.S. EPA. The OSC report is not a final reconciliation of costs.

Portions of this report's appendices may contain confidential business or enforcement-sensitive information and must be reviewed by the Office of Regional Counsel prior to release to the public. The Site is not on the National Priorities List.

Attachment cc: Gail Stanuch – SE-5J Carl Norman – SE-5J

FEDERAL ON-SCENE COORDINATOR'S REPORT COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY ACT REMOVAL ACTION AT THE INGERSOLL SITE SITE ID: B5GB NPL STATUS: NON-NPL SOUTH BEND, ST. JOSEPH COUNTY, INDIANA

Removal Dates: June 25, 2007, to August 3, 2007

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY Region V Division of Superfund Emergency Response Branch

TABLE OF CONTENTS

Section

Page

EXEC	CUTIVE SUMMARY OF THE REMOVAL ACTIVITY	ES-1
I. S	SUMMARY OF EVENTS	1
A.	SITE CONDITIONS AND BACKGROUND	1
1	1. Initial Situation	1
2	2. Location of Hazardous Substance(s)	5
3	3. Cause of Release or Discharge	
4	4. Efforts to Obtain Response by Responsible Party	5
В.		
1	1. Content and Time of Notice to Natural Resource Trustees	
2	2. Trustee Damage Assessment and Restoration Activities	8
D.	CHRONOLOGICAL NARRATIVE OF RESPONSE ACTIONS	8
1	1. Threat Abatement Actions Taken	8
2	2. Treatment/Disposal/Alternative Technology Approaches Pursued	19
3	3. Public Information and Community Relations Activity	19
E.		
II. I	EFFECTIVENESS OF REMOVAL ACTIVITIES	20
А.	ACTIONS TAKEN BY PRPs	
В.	ACTIONS TAKEN BY STATE AND LOCAL FORCES	20
C.	ACTIONS TAKEN BY FEDERAL AGENCIES AND SPECIAL TEAMS	20
D.	ACTIONS TAKEN BY CONTRACTORS, PRIVATE GROUPS, AND VOLUNTE	ERS
III.	DIFFICULTIES ENCOUNTERED	21
A.	ITEMS THAT AFFECTED THE RESPONSE	
В.	ISSUES OF INTERGOVERNMENTAL COORDINATION	21
C.	DIFFICULTIES INTERPRETING, COMPLYING WITH, OR IMPLEMENTING	
PO	LICIES AND REGULATIONS	21
IV.	RECOMMENDATIONS	
A.	MEANS TO PREVENT RECURRENCE OF THE DISCHARGE OR RELEASE	21
В.	MEANS TO IMPROVE RESPONSE ACTIONS	
C.	PROPOSALS FOR CHANGES IN REGULATIONS AND RESPONSE PLANS	21

LIST OF FIGURES

Figure

Figure 1 – Site Location Map	3
Figure 2 – Aerial Site Map	
Figure 3 – Site Features Map	
Figure 4 – Sample Location Map	14

LIST OF TABLES

<u>Table</u>

Table 1 – Organization of the Response	7
Table 2 – Waste Materials and Disposal Summary	

LIST OF ATTACHMENTS

<u>Attachment</u>

Attachment A	Photog	phic Documentation					
Attachment B	Analyt	ical Results					
Attachme	nt B1	Asbestos Air Sampling Results					
Attachme	nt B2	Characteristics of Hazardous Waste and Miscellaneous Sampling					
		Results					
Attachme	nt B3	PCB Sampling Results for Soil Samples					
Attachme	nt B4	TCLP VOC Sampling Results					
Attachme	nt B5	TCLP SVOC Sampling Results					
Attachme	nt B6	TCLP Metals Sampling Results					
Attachme	nt B7	SVOC Sampling Results for Soil Samples					
Attachme	nt B8	VOC Sampling Results for Soil Samples					
Attachme	nt B9	PCB Sampling Results for Liquid Samples					
Attachme	nt B10	SVOC Sampling Results for Liquid Samples					
Attachme	nt B11	VOC Sampling Results for Liquid Samples					
Attachme	nt B12	Total Metals Sampling Results for Liquid Samples					

ii

Page

Page

Emergency and Enforcement Response Branch Office of Superfund, U.S. EPA, Region V

OSC REPORT STANDARD APPENDICES LIST *

ID#

Site Name: South Bend Lathe Site, South Bend, St. Joseph County, Indiana Site ID No.: B5GB Task Order No.: 0079

1. Operational Files

	- A	Action Memos/Additional Funding	1-A
	- F	POLREPs	1-B
	- 5	Site Entry/Exit Log	1-C
	- H	Hot Zone Entry/Exit Log	1-D
	- 5	Site Safety Plan	1-E
	- F	Equipment & Expendables Log	1-F
		Site Logs	1-G
	- 5	Site Computer Disks	1-H
		Daily Work Orders	1-I
	- 5	Site Monitoring Logs	1-J
	- 5	Site Maps	1-K
	- 5	Site Contacts/Business Cards	1-L
	- 5	Site Photos/Videos	1-M
	- (General Correspondence/Information	1-N
	- 1	Newspaper Articles	1-0
		Site Photos/Videos	1-P
	- I	Enforcement	1-Q
2.	Finar	ncial Files	ID#
	- I	Delivery Orders	2-A
		START Technical Direction Documents	2-B
	- I	Daily Cost Reporting US EPA Form 1900-55's	2-C
		ERCS Invoices	2-D
		RCMS Cost Estimates	2-E
		Subcontractor Bid Sheets	2-F
		START Cost Documentation	2-G

Emergency and Enforcement Response Branch Office of Superfund, U.S. EPA, Region V OSC Report Standard Appendices List (cont'd)

3.	Technic	cal Files	<u>ID#</u>
	-	START Site Assessment	3A1
	-	Analytical Results/QA/QC	3-В
	-	Manifests	3-C
	-	Disposal Information	3-D
	-	Drum/Vat/Sample Logs	3-Е
	-	Compatibility Results	3-F
	-	Chains of Custody	3-G
	-	Waste Profile Sheets	3-Н

- * All files are arranged in chronological order.
- * Portions of these OSC Report Appendices may contain confidential business information or enforcement-sensitive information and must be reviewed by the Office of Regional Counsel prior to release to the public.
- * Note that certain files for this Site are maintained elsewhere by the Emergency Response Branch; these appendices are those files maintained by the OSC during the removal action.

EXECUTIVE SUMMARY OF THE REMOVAL ACTIVITY

SITE: South Bend Lathe Site

LOCATION: South Bend, St. Joseph County, Indiana

PROJECT DATES: June 25, 2007, through August 3, 2007.

INCIDENT DESCRIPTION:

The Site, located at 400 West Sample Street, South Bend, St. Joseph County, Indiana (Figure 1), is in an industrial/commercial area (Figure 2). The Site is approximately 15 acres, and includes a 440,000 square-foot industrial building (Facility), old rail lines, and parking areas. The Facility, which is located at the northern property line, parallel to Sample Street, consists of warehouse/storage space; press-machining, grinding, and cutting equipment; and maintenance and office space. The Site is bounded to the north by Sample Street, to the east by Franklin Street, to the south by commercial/industrial properties, and to the west by Chapin Street.

The Site was originally part of the Studebaker Motor Company and housed an engine plant and machine shop until 1963. Until approximately 2002, the Site manufactured industrial lathes under a variety of owners. Other historical details concerning the Site include:

- From 1964 to 2002, the Site was used for industrial purposes including lathe manufacturing.
- CJ Wood purchased the property from Studebaker in 1964 and sold the property to South Bend Lathe in February 1965.
- The Site was conveyed from South Bend Lathe to Amsted Industries in September 1965.
- Amsted Industries sold the property to LWE in July 1975. LWE became South Bend Lathe.
- South Bend Lathe sold the property to Turnmaster Corporation in January 1993.
- Turnmaster Corporation sold the Site to the ARG Corporation in May 2000.
- On December 16, 2006, the City of South Bend purchased the Site from the ARG Corporation with the intention of clearing the Site for new development.
- The building is currently vacant.

The Site was initially investigated in 1993 by Environmental Engineers, Inc., (EIS), at the request of then owner Turnmaster Corporation of Carson, California. EIS conducted an environmental investigation to determine the presence of soil or groundwater contamination near five underground storage tanks (UST) and sampled roof material that may have been asbestos-containing material (ACM). The investigation included advancing eight soil borings for soil and groundwater sampling. Total petroleum hydrocarbons (TPH) were detected in the soil and groundwater. In addition, EIS collected samples of roof tiles and found trace amounts of ACM. In 2001, Hull and Associates, Inc., (Hull) conducted Phase I and initial Phase II Environmental Site Assessments (ESA) at the Site at the request of the City of South Bend. During the Phase I ESA, Hull identified thirteen recognized environmental concerns (REC) at the Site. Several of the identified RECs included uSTs containing gasoline, motor oil, fuel oil, waste oil, and unknown contents. Other RECs included oil staining, stressed vegetation, former rail lines, and potential polychlorinated biphenyl (PCB) releases from

transformers. Hull discovered that degreasing operations took place at the Site, which included the use of chlorinated solvents including tetrachloroethylene (PERC). During the initial Phase II ESA, Hull discovered the following constituents above Indiana Department of Environmental Management Risk Integrated System of Closure (RISC) default cleanup levels in soil: benzo(a)pyrene, lead, cadmium, chromium, benzo(b)fluoranthene, and indeno(1,2,3-cd)pyrene. Other constituents, including arsenic, lead, trichloroethylene, PERC, and vinyl chloride were detected in groundwater above RISC default cleanup levels.

Previous investigations have shown that the Site's geology consists of surficial fill over approximately 75 feet of sand and gravel. The water table is approximately 25 feet below ground surface in an unconfined aquifer. Groundwater flow is to the northeast toward the St. Joseph River, located one mile from the Site.

ACTIONS: The Site was unsecured and previous investigations indicated the presence of high levels of PCBs in transformers and oily waste, damaged and friable ACM debris on the floor and piping inside the building, and reactive and ignitable wastes in unlabeled containers, which posed an immediate threat to public health, welfare, and the environment. Therefore, the United States Environmental Protection Agency (U.S. EPA) approved an Action Memorandum for the Site on April 12, 2007. The Action Memorandum requested a Comprehensive Environmental Response, Compensation, and Liability Act time-critical removal action at the Site.

U.S. EPA; the Weston Solutions, Inc., (WESTON_®) Superfund Technical Assessment and Response Team (START); and Environmental Quality Management (EQM), the Emergency and Rapid Response Services (ERRS) contractor, mobilized to the Site on June 25, 2007, to begin removing ACM from the building PCB transformers from vaults and basements; oils, sludges, and associated USTs and containers; and PCB-contaminated soil and oil.

Removal activities were completed on August 3, 2007. ERRS arranged for the transportation and disposal of 75,846 kilograms of liquid PCBs, 1,155 gallons of PCB-contaminated liquid, 25 kilograms of PCB-contaminated debris, 30 cubic yards of ACM, 1,300 gallons of waste flammable liquid (D001), 1,105 gallons of waste paint-related material, 740 gallons of non-Department of Transportation/ non-Resource Conservation and Recovery Act hazardous liquid, 50 pounds of flammable aerosols, 75 cubic yards of oil-contaminated soil, and one gallon of elemental mercury.

Kenneth Theisen, On-Scene Coordinator U.S. EPA, Region V Chicago, Illinois

I. SUMMARY OF EVENTS

A. SITE CONDITIONS AND BACKGROUND

1. Initial Situation

South Bend Lathe, located at 400 West Sample Street, South Bend, St. Joseph County, Indiana, (Site) is in an industrial/commercial area (Figure 1, Figure 2). The Site is approximately 15 acres and includes a 440,000 square-foot industrial building (Facility), old rail lines, and parking areas. The Facility, which is located at the northern property line, parallel to Sample Street, consists of warehouse/storage space; press-machining, grinding, and cutting equipment; and maintenance and office space. The Site is bounded to the north by Sample Street, to the east by Franklin Street, to the south by commercial/industrial properties, and to the west by Chapin Street.

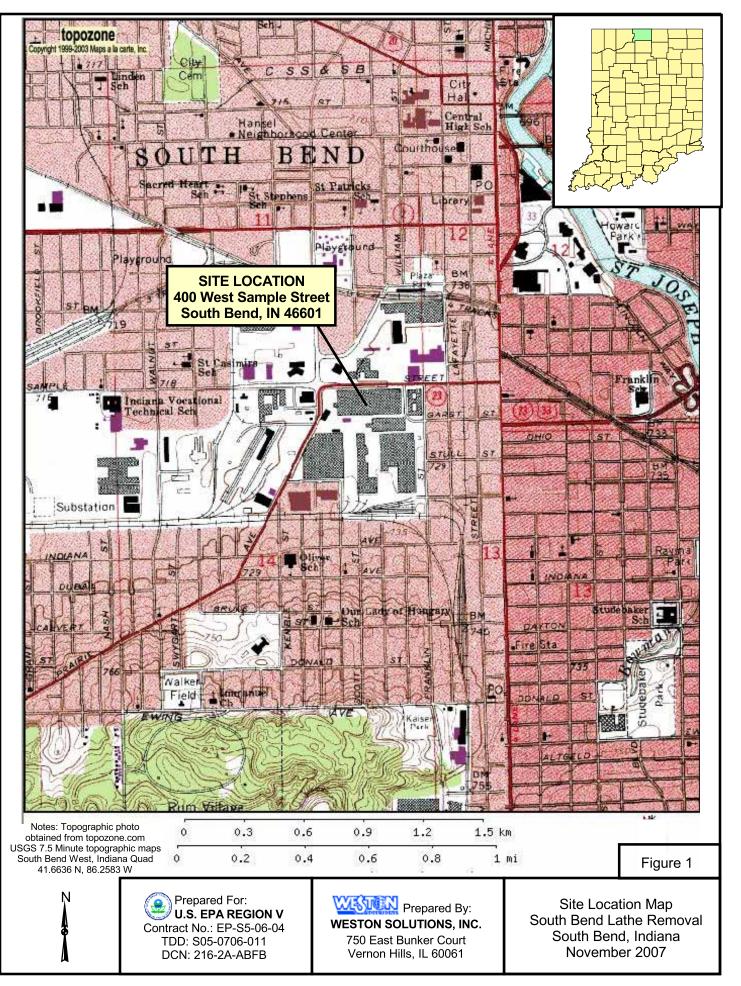
The Site was originally part of the Studebaker Motor Company and housed an engine plant and machine shop until 1963. Until approximately 2002, the Site manufactured industrial lathes under a variety of owners. Other historical details concerning the Site include:

- From 1964 to 2002, the Site was used for industrial purposes including lathe manufacturing.
- CJ Wood purchased the property from Studebaker in 1964 and sold the property to South Bend Lathe in February 1965.
- The property was conveyed from South Bend Lathe to Amsted Industries in September 1965.
- Amsted Industries sold the property to LWE in July 1975. LWE became South Bend Lathe.
- South Bend Lathe sold the property to Turnmaster Corporation in January 1993.
- Turnmaster Corporation sold the Site to the ARG Corporation in May 2000.
- On December 16, 2006, the City of South Bend purchased the Site from the ARG Corporation with the intention of clearing the Site for new development.
- The building is currently vacant.

The Site was initially investigated in 1993, by Environmental Engineers, Inc., (EIS), at the request of then owner Turnmaster Corporation of Carson, California. EIS conducted an environmental investigation to determine the presence of soil or groundwater contamination near five underground storage tanks (UST) and sampled roof material that may have been asbestos-containing material (ACM). The investigation included advancing eight soil borings for soil and groundwater sampling. Total petroleum hydrocarbons (TPH) were detected in the soil and groundwater. In addition, EIS collected samples of roof tiles and found trace amounts of ACM. In 2001, Hull and Associates, Inc., (Hull) conducted Phase I and initial Phase II Environmental Site Assessments (ESA) at the Site at the request of the City of South Bend. During the Phase I ESA, Hull identified 13 recognized environmental conditions (REC) at the Site. Several of the identified RECs included USTs containing gasoline, motor oil, fuel oil, waste oil, and unknown contents. Other RECs included oil staining, stressed vegetation, former rail lines, and potential polychlorinated biphenyl (PCB) releases from transformers. Hull discovered that degreasing operations took place at the Site, which included

the use of chlorinated solvents including tetrachloroethylene (PERC). During the initial Phase II ESA, Hull discovered the following constituents above Indiana Department of Environmental Management (IDEM) Risk Integrated System of Closure (RISC) default cleanup levels in soil: benzo(a)pyrene, lead, cadmium, chromium, benzo(b)fluoranthene, and indeno(1,2,3-cd)pyrene. Other constituents, including arsenic, lead, trichloroethylene, PERC, and vinyl chloride were detected in groundwater above RISC default cleanup levels.

Previous investigations have shown that the Site's geology consists of surficial fill overlaying approximately 75 feet of sand and gravel. The water table is approximately 25 feet below ground surface in an unconfined aquifer. Groundwater flow is to the northeast toward the St. Joseph River, located one mile from the Site.





2. Location of Hazardous Substance(s)

In January 2007, the United States Environmental Protection Agency (U.S. EPA) and the Weston Solutions, Inc., (WESTON_®) Superfund Technical Assessment and Response Team (START) conducted a Site Assessment: During this investigation, WESTON START collected 18 samples at the Site: six drum samples, two small-container samples, three UST samples, three potential ACM samples, one pit sample, two transformer samples, and one sample of floor sweepings.

Analytical results for the samples collected by WESTON START included:

- Asbestos samples contained up to 90 percent (%) chrysotile.
- Drum samples yielded heat contents of up to14,900 British thermal units (BTU), and flashpoints as low as 72.2 degrees Fahrenheit.
- Drum samples contained 2-Butanone, PERC, ethylbenzene, toluene, and total xylenes at concentrations up to 13,700 micrograms per kilogram (µg/kg); 2,130 µg/kg; 4,680 µg/kg;1,050 µg/kg; and 16,200 µg/kg, respectively.
- UST samples contained high concentrations of gasoline-range organics (372,000 milligrams per kilogram [mg/kg]) and diesel-range organics (1,040,000 mg/kg).
- Transformer samples contained total PCB concentrations up to 421,000 mg/kg.

In addition, mercury switches and switching gear were identified at the Site.

On April 12, 2007, based on the results of previous investigations, which indicated the presence of ACM, volatile organic compounds (VOC) in drum liquids, and PCBs in soil and/or groundwater at concentrations that exceeded human and environmental health and welfare risk criteria, U.S. EPA approved an Action Memorandum for the Site, and requested a Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) time-critical removal action to mitigate site hazards.

3. Cause of Release or Discharge

ACM, oil, and PCBs were commonly used at manufacturing facilities that were active during the same time that the Site was active. ACM was used as insulation on steam pipes and thermal system elements until 1989 when U.S. EPA issued a rule banning most ACM products. Likewise, PCBs were added to oils and paints used in and around heat-producing equipment, such as transformers, until 1979 when U.S. EPA banned the manufacture of PCBs and began to phase out PCBs in manufacturing. Spills and releases of these materials during and after Site operation could have led to the conditions at the Site at the time of the U.S. EPA site assessment.

4. Efforts to Obtain Response by Responsible Party

The following entities owned the South Bend Lathe Site, according to the Chain of Title:

- CJ Wood purchased the property from Studebaker in 1964 and sold the property to South Bend Lathe in February 1965.
- The property was conveyed from South Bend Lathe to Amsted Industries in September 1965.
- Amsted Industries sold the property to LWE in July 1975. LWE became South Bend

Lathe.

- South Bend Lathe sold the property to Turnmaster Corporation in January 1993.
- Turnmaster Corporation sold the Site to the ARG Corporation in May 2000.
- On December 16, 2006, the City of South Bend purchased the Site from the ARG Corporation with the intention of clearing the Site for new development.

EPA is seeking information to determine if ownership of any of the waste materials can be traced back to the previous owners. General notice letters were issued to several previous owners and officers, including Norbert Toubes, an officer for both ARG Corporation and Turnmaster Corporation. Information request letters were issued to identify any additional liability information and insurance coverage information.

If additional information is uncovered during the investigation of the former owners of the Site which shows that the potentially responsible parties (PRP) involved are both liable and viable, the appropriate administrative order will be issued. Since the removal action was conducted as Fundled, cost recovery will be pursued as well as potential recovery of government funds via the former owner's insurance coverage.

B. ORGANIZATION OF RESPONSE

U.S. EPA, WESTON START, and Environmental Quality Management (EQM), the Emergency and Rapid Response Services (ERRS) contractor, mobilized to the Site on June 25, 2007. Consistent with the U.S. EPA Action Memorandum, the team began removing ACM; oils, sludges, and PCB-contaminated oils from tanks; and excavating PCB- and oil-contaminated soil. Table 1 summarizes the organization of the response.

Table 1 Organization of the Response South Bend Lathe Removal Site South Bend, St. Joseph County, Indiana						
Agencies or Parties Involved	Contact	Description of Participation				
U.S. EPA – Region V Division of Superfund Emergency Response Branch 77 West Jackson Boulevard Chicago, Illinois 60604 (312) 886-7182	Kenneth Theisen	Federal OSC responsible for overall project oversight and success.				
Weston Solutions, Inc. 20 North Wacker Drive Suite 1210 Chicago, Illinois 60606 (312) 424-3300	Sarah Meyer	WESTON START project manager responsible for START direction and START-related project success.				
Weston Solutions, Inc. 20 North Wacker Drive Suite 1210 Chicago, Illinois 60606 (312) 424-3300	Jay Rauh	WESTON START on-site representative responsible for removal oversight support, documentation, air monitoring, sampling, and START-related cost- tracking.				
Environmental Quality Management, Inc. 1800 Carillon Boulevard Cincinnati, Ohio (800) 500-0575	Jeff Rhinefield	Response manager responsible for direction of daily ERRS activity. Provided personnel and equipment necessary for removal and coordinated transportation and disposal of waste streams. Also tracked ERRS-related costs.				
City of South Bend 227 W. Jefferson Boulevard Suite 1200 S South Bend, Indiana 46601 (574) 245-6112	Andy Laurent	Community and Economic Development: Project manager who has worked closely with U.S. EPA during all phases of the removal action.				

ERRS – Emergency and Rapid Response Services

OSC – On-Scene Coordinator

START – Superfund Technical Assessment and Response Team

U.S. EPA – United States Environmental Protection Agency

WESTON – Weston Solutions, Inc.

1. Content and Time of Notice to Natural Resource Trustees

(Not Applicable)

2. Trustee Damage Assessment and Restoration Activities

(Not Applicable)

D. CHRONOLOGICAL NARRATIVE OF RESPONSE ACTIONS

1. Threat Abatement Actions Taken

U.S. EPA, WESTON START, and the ERRS contractor mobilized to the Site on June 25, 2007, and began setup activities, at which time security was established for the Site during non-working hours for the duration of the removal. Removal activities commenced on July 30, 2007.

From June 25, 2007, through June, 29, 2007, WESTON START performed the following removal activities at the Site:

- Conducted air monitoring at the Site perimeter near work areas using a MultiRAE fivegas photo-ionization detector (PID). MultiRAE readings for VOC vapor, carbon monoxide, hydrogen sulfide, and percent of the lower explosive limit were below the limits of detection and oxygen levels were 20.9%.
- Throughout the duration of the project, a total of one solid sample, 10 asbestos air samples, five soil samples, one liquid (aqueous) sample, and one flammable liquid sample were collected by WESTON START and ERRS. Sampling dates, locations, and results are presented in Attachments B1 through B12. Laboratory data reports and sample chains of custody are located in the site files.
- Collected eight-hour personnel and perimeter air samples for asbestos. Beginning on June 26, 2007, and continuing through July 5, 2007, WESTON START collected daily asbestos air samples during asbestos removal operations. WESTON START collected a total of five personnel air samples for asbestos and five perimeter air samples for asbestos. Throughout the removal, concentrations of asbestos in the air samples did not exceeded 0.1 fibers per cubic centimeter (f/cc), the Occupational Safety and Health Administration (OSHA) permissible exposure limit (PEL) for asbestos fibers, or 0.01 f/cc, the Asbestos Hazard Emergency Response Act criterion for protection against airborne asbestos fibers in public areas. Results for personnel and perimeter air sampling for asbestos are summarized in Attachment B1. Laboratory data reports and sample chains of custody are located in the Site files.
- Tested the pH of liquid in plating vats inside room 7241 (Figure 3) which had been previously uncharacterized by the removal team. On June 29, 2007, using field testing techniques, WESTON START member Jay Rauh determined that the liquids had pH readings up to 11.

From June 25, 2007, through June 29, 2007, ERRS performed the following removal activities:

- Setup asbestos work zone areas in high traffic areas. The goal was not to completely abate asbestos from the facility, but to remove it from high-traffic areas so that removal activity could commence safely.
- On June 25, 2007, ERRS Response Manager (RM) Jeff Rhinefield collected sample PCB VAULT-TILE from material near PCB transformers in the west transformer room

(Figure 3) that appeared to be ACM. Laboratory results confirmed that the sample was composed of 78% chrysotile. The tiles were disposed of with the other ACM abated from the Site.

- Abated asbestos tiles and pipe insulation in two transformer rooms.
- Excavated the soil and pavement above four USTs south of the site building and along the southern property line (three 20,000-gallon capacity and one 5,000-gallon capacity) and opened the manways for liquid removal.
- Explored anomalies in the east and northeast parking lots by trenching with a trackhoe. No additional USTs were discovered, although a sand-filled vault and tunnel complex were found. These were reported to be remnants of a former Studebaker underground steam tunnel complex.
- Began staging drums and small containers in preparation for hazard categorization (HAZCAT).
- Mobilized off-hour security.

Asbestos and lead air sampling results were reviewed and tabulated daily upon receipt from the laboratory. Although there were no exposure-limit exceedances, safe asbestos practices were discussed between the OSC, WESTON START, and ERRS. ERRS took steps to reduce the amount of fibers and particulates in the air using techniques such as wetting or installing additional work enclosures. At the direction of the U.S. EPA OSC, site work that included debris and asbestos removal continued in Level C personal protective equipment (PPE) for the duration of the removal despite personnel air sampling results that were within the OSHA PEL guidelines.

From July 5, 2007, through July 7, 2007, WESTON START performed the following removal activities at the Site:

- Continued air sampling and monitoring consistent with methods described previously.
- Detected an unknown VOC with the MultiRAE after dewatering the floor in the west transformer room. Dewatering was done after completion of asbestos abatement, but before transformer removal. WESTON START Rauh recorded a VOC reading of 5.0 parts per million (ppm). WESTON START recommended that all work stop in that room until appropriate PPE was mobilized. OSC Theisen and RM Rhinefield agreed that ERRS and ERRS subcontractors would don level C PPE while continuously venting the room any time work was performed. WESTON START continued to monitor the room before and during any work activity in that room. No readings above 0.5 ppm were recorded during work activity. There were no elevated VOC readings in the east transformer room.
- Tested the pH of a gold/brown powder found in the floor of room 7241 (the plating room). WESTON START member Rauh measured the pH of the powder by putting the powder in a solution of purified water. pH readings up to 11 were recorded.

EXIT 7249 7253 7223 7222 7221 REPAIR FINAL TEST UNIT ASSEMBLY UNIT ASSEMBLY UNIT ASSEMBLY 7282 OFFICES 7243 7215 7245 WAREHOUSE & CAST IRON TURNING SERVICE STORE & PKG PACKAGING STORES 7900 7230 IMPORTS RECEIVING FINAL ASSEMBLY 7244 7282 WAREHOUSE & STORES 7215 OFFICES 7214 CAST IRON 7720 PLANING, BED MILLING & GRINDING TURNING 7242 DECK 7265 PREPARATION ASSEMBLY West TOOL-CRIB & PAVED East TOOL GRINDING Transformer DOCK Transforme 7213 AREA Room Room 7244 7242 FINISH PAINT MILLING & DRILLING CRATING 7252 FLR Ш 7218 MACHINE CENTER INSPECTION 7320 7242 7216 STEEL 7271-7272 7242 JP FILL CASTING PAINTING MAINTENANCE & 7212 GRINDING, 7320 ROOM 7282 PREP MACHINE REPAIR TURNING 7282 PRESS WAREHOUSE EXIT WAREHOUSE ASSEMBLY TRACER. 7282 LATHES WAREHOUSE 7300 WAREHOUSE 7211 7310 PRESS 7211 7330 7282 MACHINES 7241 7264 MACHINE GEAR FABRICATION WAREHOUSE HEAT TOOL RM CUTTING 7235 TREATING 7282 CNC 7300 BOILER WAREHOUSE LATHES JP STORES ROOM EXIT UST JP FIN PAINT UST UST UST Figure 3 LEGEND N NOTE: Prepared For: ٩ Prepared By: Drawing not to scale Site Features Map **Building Layout** 🕖 U.S. EPA REGION V South Bend Lathe Removal WESTON SOLUTIONS, INC. Contract No.: EP-S5-06-04 UST= Underground South Bend, Indiana TDD: S05-0706-011 750 East Bunker Court **Transformer Basements** Storage Tanks November 2007 DCN: 216-2A-ABFB Vernon Hills, IL 60061

NJW D:\Location Maps\South Bend\southbend d.ap

From July 5, 2007, through July 7, 2007, ERRS performed the following removal activities at the Site:

- Continued abating asbestos from transformer rooms and high traffic areas.
- Removed steel plates above transformers for venting VOCs and for future transformer removal.
- Mobilized a carbon treatment system to treat aqueous wastes before discharge into the City of South Bend sewer system.
- Began excavating three 20,000 gallon USTs located on the southern portion of the property.
- Set up an exhaust fan through the roof of the west transformer room to vent VOC vapors.
- Staged drums and small containers in preparation for HAZCATting.

From July 9, 2007, through July 13, 2007, WESTON START performed the following removal activities at the Site:

- Continued air sampling and monitoring consistent with methods described previously.
- Collected one composite clearance soil sample beneath the north 20,000 gallon UST (SBL-S001-071207). Sample material was taken from the sidewalls and beneath the UST. The soil contained 120 mg/kg-dry of TPH and 0.046 mg/kg-dry of PCB Aroclor 1260. OSC Theisen instructed ERRS to backfill the excavation based on the results. Sampling locations are illustrated on Figure 4.

From July 9, 2007, through July 13, 2007, ERRS performed the following removal activities at the Site:

- Mobilized a roll-off container for ACM disposal.
- Appropriately labeled container and bags of ACM waste.
- Mobilized a tanker to take approximately 4,545 kilograms of low-level PCB-contaminated oily liquid from the north and east 20,000 gallon USTs.
- Excavated the north 20,000 gallon UST.
- Mobilized HAZCAT specialist Mark Douglas of EQM to begin HAZCAT ting previously staged and logged drums and containers.
- Completed HAZCATting and segregating wastes.
- Decontaminated a 20,000 gallon UST with power washers so that the tank could be sold as scrap. ERRS donned Level C PPE for this activity while WESTON START Rauh monitored the work area with a MultiRAE. ERRS used a confined space entry program and vented the work space by cutting large holes on either end of the tank.
- Removed apparent plating wastes and ACM from room 7241.

On July 12, 2007, U.S. EPA health and safety auditor Bill Boyett performed a health and safety audit at the Site.

Also on July 12, 2007, U.S. EPA and City of South Bend officials conducted a media event to convey future plans for the Site to the public.

From July 16, 2007, through July 20, 2007, WESTON START performed the following removal activities at the Site:

- Continued monitoring consistent with methods described previously.
- Collected two composite clearance soil samples (SBL-002-071607 and SBL-003-071607) from the soil beneath the southern and eastern 20,000-gallon USTs. The sampling results indicated that the soil contained 1,600 mg/kg-dry and 29 mg/kg-dry, respectively, of TPH. Based on sampling results, OSC Fredrick Micke instructed ERRS to backfill the 20,000 gallon UST excavation. OSC Micke was at the Site on several days throughout the removal action when OSC Theisen was not available.
- Collected one liquid (aqueous) sample (SBL-W001-071907). The sample was collected of wastewater that had been treated on site with the mobile water treatment unit. The wastewater was generated from dewatering the transformer rooms and rainwater accumulation in the 5,000 gallon UST. PCB Aroclor 1260 was detected at 0.038 milligrams per liter in the sample. At the direction of OSC Theisen, the water was discharged to the City of South Bend sewer system after sampling through the manhole located south of the southwest entrance to the building (see sample location on Figure 4).
- Collected a sample of hydrocarbon-stained soil (SBL-S004-072007) from the bottom and sidewalls of the 5,000-gallon UST excavation. The sample was analyzed for disposal parameters. The sampling results indicated that the soil contained 1,800 mg/kg-dry of TPH. OSC Micke instructed ERRS to excavate obvious petroleum staining before collecting a clearance sample.
- Conducted a health and safety audit. WESTON START project manager Sarah Meyer was at the Site on July 16, 2007, to perform the audit.

From July 16, 2006, through July 20, 2007, ERRS performed the following removal activities at the Site:

- Continued decontamination of 20,000-gallon USTs.
- Arranged for all three 20,000-gallon USTs to be sold as scrap and hauled off the Site.
- Treated wastewater that had been drained from transformer rooms and the 5,000 gallon UST by neutralizing and pumping it through a carbon treatment system before discharge.
- Continued segregating wastes in small containers and containerized high pH, apparent plating wastes.
- Removed the remaining 5,000-gallon UST.
- Began excavating the oil-contaminated soil around the 5,000-gallon UST.
- Disposed of approximately 36,908 kilograms of PCB-contaminated liquid (Table 2).
- Moved caustic powders (pH 11 in solution) and floor debris from room 7241 and consolidated them with appropriate waste streams.

From July 23, 2007, through July 27, 2007, WESTON START performed the following removal activities at the Site:

• Air sampling and monitoring consistent with methods described previously.

- Briefed transformer removal subcontractors, Clean Harbors, on health and safety practices and gained heath and safety plan sign-off from their four-member team.
- Screened both transformer rooms with a MultiRAE during all transformer removal activities. The highest recorded reading was 0.02 ppm of VOCs in the west transformer room. Clean Harbors donned Level C PPE during transformer removal activities.
- Collected one composite clearance soil sample beneath the west 5,000-gallon UST (SBL-S005-072407). Sample material was taken from the excavation sidewalls and beneath the UST. The soil contained 170 mg/kg-dry of TPH and 0.091 mg/kg-dry of PCB Aroclor 1260. OSC Theisen instructed ERRS to backfill the excavation based on these results.

EXIT 7249 7253 7223 7222 7221 REPAIR FINAL TEST UNIT ASSEMBLY UNIT ASSEMBLY UNIT ASSEMBLY 7282 OFFICES 7243 7215 7245 WAREHOUSE & CAST IRON TURNING SERVICE STORE & PKG PACKAGING STORES 7900 7230 IMPORTS RECEIVING FINAL ASSEMBLY 7244 7282 WAREHOUSE & STORES 7215 OFFICES 7214 CAST IRON 7720 PLANING, BED MILLING & GRINDING TURNING 7242 DECK 7265 PREPARATION ASSEMBLY **TOOL-CRIB &** PCB VAULT-TILE PAVED TOOL GRINDING DOCK 7213 AREA 7244 7242 FINISH PAINT MILLING & DRILLING CRATING 7252 FLR \Box \land 7218 MACHINE CENTER INSPECTION 7320 7242 7216 STEEL 7271-7272 7242 JP FILL CASTING PAINTING MAINTENANCE & 7212 GRINDING, 7320 ROOM 7282 PREP MACHINE REPAIR TURNING 7282 PRESS WAREHOUSE EXIT WAREHOUSE ASSEMBLY TRACER. 7282 LATHES WAREHOUSE 7300 WAREHOUSE 7211 7310 PRESS 7211 7330 7282 MACHINES 7241 7264 MACHINE GEAR FABRICATION WAREHOUSE HEAT TOOL RM CUTTING 7235 TREATING 7282 CNC 7300 BOILER WAREHOUSE LATHES JP STORES ROOM EXIT UST JP 2 FIN West 5,000 gallon UST PAINT SBL-S004-072007 UST SBL-S005-072407 • East 20,000 gallon UST UST SBL-W001-071907 SBL-S003-071607 • North 20,000 gallon UST SBL-S001-071207 UST South 20,000 gallon UST • SBL-S002-071607 LEGEND **Building Layout** Figure 4 **Transformer Basements** Prepared For: Prepared By: \bigcirc ٩ Sample Location Map Soil Sampling Location U.S. EPA REGION V South Bend Lathe Removal WESTON SOLUTIONS, INC. **Aqueous Sampling Location** Contract No.: EP-S5-06-04 NOTE: South Bend, Indiana TDD: S05-0706-011 750 East Bunker Court Asbestos Sampling Location \wedge Drawing not to scale November 2007 DCN: 216-2A-ABFB Vernon Hills, IL 60061

South Bend Lathe Removal Table 2 - Waste Materials and Disposal Summary June 25, 2007 to August 3, 2007

Waste Description	Quantity	Date Shipped	Manifest Number/ Waste Shipment Number	Transporter Name and Location	Disposal Method	Disposal Facility Name and Location
RQ, Polychlorinated Biphenyls, Liquid, 9, UN2315, PG II	4,545 KG	7/10/07	000051319VES	Triad Transport, Inc.	Incineration	Veolia Technical Solutions Highway 73 3.5 miles west of Taylor's Bayou Port, Arthur, Texas 77640
RQ, Polychlorinated Biphenyls, Liquid, 9, UN2315, PG II	19,636 KG	7/16/07	000051320VES	Triad Transport, Inc.	Incineration	Veolia Technical Solutions Highway 73 3.5 miles west of Taylor's Bayou Port, Arthur, Texas 77640
RQ, Polychlorinated Biphenyls, Liquid, 9, UN2315, PG II	17,272 KG	7/16/07	000051320VES	Triad Transport, Inc.	Incineration	Veolia Technical Solutions Highway 73 3.5 miles west of Taylor's Bayou Port, Arthur, Texas 77640
RQ, Polychlorinated Biphenyls, Liquid, 9, UN2315, PG III	(8 totes, 1,920 KG each) 15,363 KG	7/24/07	000994550FLE	Clean Harbors Environmental Service	Incineration	Clean Harbors LLC 1302 West 38 th Street Ashtabula, Ohio 44004
RQ, Polychlorinated Biphenyls, Liquid, 9, UN2315, PG III	2 Transformers, 5,909 KG	7/26/07	000994570FLE	Clean Harbors Environmental Service	Incineration	Clean Harbors LLC 1302 West 38 th Street Ashtabula, Ohio 44004
RQ, Polychlorinated Biphenyls, Liquid, 9, UN2315, PG III	3 Transformers, 13,121 KG	7/26/07	000994571FLE	Clean Harbors Environmental Service	Incineration	Clean Harbors LLC 1302 West 38 th Street Ashtabula, Ohio 44004

South Bend Lathe Removal Table 2 - Waste Materials and Disposal Summary (Continued) June 25, 2007 to August 3, 2007

Waste Description	Quantity	Date Shipped	Manifest Number/ Waste Shipment Number	Transporter Name and Location	Disposal Method	Disposal Facility Name and Location
RQ, Polychlorinated Biphenyls, Solid, 9, UN3432, PG III	25 KG	7/26/07	000994571FLE	Clean Harbors Environmental Service	Incineration	Clean Harbors LLC 1302 West 38 th Street Ashtabula, Ohio 44004
Glass, Plastic, Paper, Wood, PPE Containing Asbestos	30 CY	7/27/07	051906-1	Allied Waste Services 57820 Charlotte Ave. Elkhart, IN	Landfill	County Line Landfill OS 31 Argos, Indiana 46501
RQ, Waste Flammable Liquid, N.O.S., 3, UN1993, PG II, (Mineral Spirits, Oil), (D001)	1,300 GAL	7/27/07	003369129JJK	Nortru Transportation	Treatment	Petro-Chem Processing 421 Lycaste Detroit, Michigan 48214
RQ Waste Paint Related Material, 3, UN1263, PG II, (D001)	1,050 GAL	7/27/07	003369133JJK	Nortru Transportation	Treatment	Petro-Chem Processing 421 Lycaste Detroit, Michigan 48214
RQ Waste Paint Related Material, 3, UN1263, PG II	55 GAL	7/27/07	003369133JJK	Nortru Transportation	Treatment	Petro-Chem Processing 421 Lycaste Detroit, Michigan 48214
Waste Aerosols, Flammable, 2.1 UN 1950, PG II	50 LBS	7/27/07	003369133JJK	Nortru Transportation	Treatment	Petro-Chem Processing 421 Lycaste Detroit, Michigan 48214
Universal Waste – Mercury Containing Devices, Not DOT Regulated, (Mercury Switches)	1 GAL	7/27/07	003369133JJK	Nortru Transportation	Recycled	Petro-Chem Processing 421 Lycaste Detroit, Michigan 48214

South Bend Lathe Removal Table 2 - Waste Materials and Disposal Summary (Continued) June 25, 2007 to August 3, 2007

Waste Description	Quantity	Date Shipped	Manifest Number/ Waste Shipment Number	Transporter Name and Location	Disposal Method	Disposal Facility Name and Location
Non-DOT/Non-RCRA Hazardous Liquid	300 GAL	7/27/07	003369133JJK	Nortru Transportation	Treatment	Petro-Chem Processing 421 Lycaste Detroit, Michigan 48214
Non-DOT/Non-RCRA Hazardous Liquid	300 GAL	7/27/07	003369133JJK	Nortru Transportation	Treatment	Petro-Chem Processing 421 Lycaste Detroit, Michigan 48214
Non-DOT/Non-RCRA Hazardous Liquid	140 GAL	7/27/07	003369133JJK	Nortru Transportation	Treatment	Petro-Chem Processing 421 Lycaste Detroit, Michigan 48214
RQ Hazardous Waste, Liquid, N.O.S. (Polychlorinated biphenyls, benzene), 9, NA3082, PG III (Polychlorinated biphenyls)	1,155 GAL	7/30/07	000538589FLE	DART Trucking Company, Inc.	Incineration	Spring Grove Resource Recovery, Inc. 4897 Spring Grove Avenue Cincinnati, Ohio 45232
Motor Oil and Hydraulic Oil Impacted Soil	5 loads, 75 CY	8/1/07	0160698 0018- 0022	Klink Trucking	Landfill	County Line Landfill OS 31 Argos, Indiana 46501

South Bend Lathe Removal Table 2 - Waste Materials and Disposal Summary (Continued) June 25, 2007 to August 3, 2007

Notes:	
CY – Cubic yards	N.O.S. – Not Otherwise Specified
DOT – Department of Transportation	PCB – Polychlorinated biphenyl
GAL – Gallons	PG – Packing Group
K – Kilograms	RCRA - Resource Conservation and Recovery Act
LBS – Pounds	RQ – Reportable Quantity
N/A – Not applicable	UN – United Nations

From July 23, 2007, through July 27, 2007, ERRS performed the following removal activities at the Site:

- Backfilled excavations where the three 20,000-gallon USTs and one 5,000-gallon UST had been with clean, sandy fill.
- After heavy rains fell during the weekend, ERRS dewatered the transformer rooms before the transformer removal subcontractor arrived at the Site.
- Selected and mobilized the PCB transformer removal subcontractor, Clean Harbors, to remove PCB transformers and the oil inside them.
- Demolished a steel structure on the south part of the Site to allow for continuing excavation of hydrocarbon contaminated soil near the 5,000-gallon UST. Andy Laurent of the City of South Bend agreed that this was necessary.
- Clean harbors removed PCB-containing oil and five PCB transformers from the two onsite transformer rooms.

OSC Theisen requested that WESTON START member Rauh be demobilized from the site on July 27, 2007, since the goals of the removal action had been met. ERRS remained on site to complete the remaining site tasks.

From July 30, 2007, through August 3, 2007, ERRS performed the following removal activities at the Site:

- Arranged for transportation and disposal of hydrocarbon-contaminated soil excavated from the area near the 5,000-gallon UST.
- Decontaminated equipment used for removal activities.
- Demobilized heavy equipment, temporary offices, security, and personnel.

2. Treatment/Disposal/Alternative Technology Approaches Pursued

Ten waste streams were identified at the Site for disposal or recycling. The shipping dates, volumes shipped, transporter names, and disposal facilities are summarized in Table 2. The following methods were used to dispose of the waste streams:

- ACM debris was landfilled.
- Liquid PCBs and PCB-contaminated liquids were incinerated.
- Low-level PCB-contaminated debris was landfilled.
- Waste flammable liquids, waste paint-related material, and non-Department of Transportation/ non-Resource Conservation and Recovery Act hazardous liquids were treated.
- Flammable aerosols were treated.
- Mercury was recycled.
- Oil-contaminated soil was landfilled.

3. Public Information and Community Relations Activity

On July 12, 2007, City of South Bend officials and U.S. EPA conducted a media event to convey future plans for Site use to the public. Media representatives from local newspapers, television

stations, and radio stations were at the Site. The event was covered on local, evening newscasts and in the local newspaper on July 13, 2007. Andy Laurent conducted the event while reporters interviewed OSC Ken Theisen and ERRS representative Mark Douglas.

E. RESOURCES COMMITTED

Extramural Costs:

Total ERRS Contractor Costs: Total WESTON START Costs: Extramural Subtotal	\$344,449 \$36,290 \$380,739
Estimated Total Project Costs	\$380,739
Project Ceiling	\$380,739

II. EFFECTIVENESS OF REMOVAL ACTIVITIES

A. ACTIONS TAKEN BY PRPs

U.S. EPA is seeking information to determine if ownership of any of the waste materials can be traced back to the previous owners.

General notice letters were issued to several previous owners and officers, including Norbert Toubes, who was an officer for both ARG Corporation and Turnmaster Corporation. Information request letters were issued to identify any additional liability information and insurance coverage information.

If additional information is uncovered during the investigation of the former owners of the Site which shows that the PRPs involved are both liable and viable, the appropriate administrative order will be issued. Since the removal action was conducted as Fund-led, cost recovery will be pursued as well as potential recovery of government funds via the former owner's insurance coverage.

B. ACTIONS TAKEN BY STATE AND LOCAL FORCES

The City of South Bend requested the assistance of U.S EPA in performing the removal because it lacked the technical expertise and funds to conduct the cleanup.

C. ACTIONS TAKEN BY FEDERAL AGENCIES AND SPECIAL TEAMS

On July 12, 2007, U.S. EPA health and safety auditor Bill Boyett performed a health and safety audit at the Site.

D. ACTIONS TAKEN BY CONTRACTORS, PRIVATE GROUPS, AND VOLUNTEERS

The U.S. EPA ERRS contractor, EQM, removed ACM, oil and oil-contaminated soil, PCBcontaminated oil, wastes, and soil, PCB transformers, various caustic and flammable solids and wastes, and treated wastewater. ERRS coordinated the transportation and disposal of all waste streams and arranged for Site security, utilities, and the use of necessary equipment, such as an excavator, loader, Bobcat®, pumps, and a tanker truck to perform the removal action, and procured all subcontractors.

The U.S. EPA START contractor, WESTON, provided technical support for the U.S. EPA. In addition, WESTON START performed general and health and safety oversight, documentation of Site activities, air monitoring, multi-media sampling, and START-related cost tracking.

Two contracted laboratories were used to perform all analyses required during removal activities. ACM Engineering & Environmental Services located at 26598 U.S. 20 West, South Bend, Indiana, performed the analyses of all asbestos in air samples. Microbac Laboratories, located at 250 West 84th Drive, Merrillville, Indiana, performed all additional analytical work for the Site.

III. DIFFICULTIES ENCOUNTERED

A. ITEMS THAT AFFECTED THE RESPONSE

(Not Applicable)

B. ISSUES OF INTERGOVERNMENTAL COORDINATION

(Not Applicable)

C. DIFFICULTIES INTERPRETING, COMPLYING WITH, OR IMPLEMENTING POLICIES AND REGULATIONS

(Not Applicable)

IV. RECOMMENDATIONS

A. MEANS TO PREVENT RECURRENCE OF THE DISCHARGE OR RELEASE

Since asbestos was only abated by U.S. EPA in areas where removal activities occurred, the City of South Bend should be aware that this issue should be addressed prior to demolition activities. The OSC has not identified any other additional tasks to be completed before the City of South Bend takes possession of the Site.

B. MEANS TO IMPROVE RESPONSE ACTIONS

(Not Applicable)

C. PROPOSALS FOR CHANGES IN REGULATIONS AND RESPONSE PLANS

(Not Applicable)

ATTACHMENT A PHOTOGRAPHIC DOCUMENTATION



Site: South Bend Lathe RemovalPhoto Number: 1Date: June 27, 2007Direction: WestPhotographer: Jay RauhSubject: Asbestos tiles and other debris in the west transformer room



Site: South Bend Lathe Removal Photo Number: 2 Direction: East Subject: Asbestos insulation on a PCB transformer

Date: June 27, 2007 **Photographer:** Jay Rauh



Site: South Bend Lathe Removal Photo Number: 3 Direction: East Subject: PCB transformer after asbestos abatement

Date: June 27, 2007 **Photographer:** Jay Rauh



Site: South Bend Lathe RemovalPhoto Number: 4Date: June 30, 2007Direction: SouthwestPhotographer: Jay RauhSubject: Vats of liquid in the "plating room" (Note: The dates on some photos are incorrect due to the camera's date having been reset.)



Site: South Bend Lathe Removal Photo Number: 5 Direction: Southwest Subject: Vat of caustic liquid, pH 11

Date: June 30, 2007 **Photographer:** Jay Rauh



Site: South Bend Lathe RemovalPhoto Number: 6DDirection: NorthwestPSubject: Small containers staged for hazard categorization

Date: July 7, 2007 **Photographer:** Jay Rauh



Site: South Bend Lathe Removal Photo Number: 7 Direction: North Subject: Exhaust vent for west transformer room

Date: July 7, 2007 **Photographer:** Jay Rauh



Site: South Bend Lathe RemovalPhoto Number: 8Date: July 10, 2007Direction: West-NorthwestPhotographer: Jay RauhSubject: Contents of the south 20,000-gallon USTs being transferred to a tanker for transport



Site: South Bend Lathe RemovalPhoto Number: 9Date: July 11, 2007Direction: NortheastPhotographer: Jay RauhSubject: ERRS member Mark Douglas performing hazard categorization on wastes



Site: South Bend Lathe RemovalPhoto Number: 10Date: July 12, 2007Direction: SouthPhotographer: Jay RauhSubject: OSC Ken Theisen being interviewed by local media



Site: South Bend Lathe Removal Photo Number: 11 Direction: South-Southeast Subject: ERRS removing the north 20,000-gallon UST

Date: July 12, 2007 **Photographer:** Jay Rauh



Site: South Bend Lathe Removal Photo Number: 12 Direction: Northeast Subject: Carbon treatment system for aqueous waste

Date: July 13, 2007 **Photographer:** Jay Rauh



Site: South Bend Lathe Removal Photo Number: 13 Date: July 13, 2007 Photographer: Jay Rauh **Direction:** East Subject: Hydrocarbon-contaminated soil in the excavation of the 5,000-gallon UST



Site: South Bend Lathe Removal Photo Number: 14 **Direction:** East Subject: Clean fill where the 20,000-gallon USTs were buried

Date: July 23, 2007 Photographer: Jay Rauh



Site: South Bend Lathe RemovalPhoto Number: 15Date: July 25, 2007Direction: WestPhotographer: Jay RauhSubject: ERRS subcontractor Clean Harbors removing a PCB transformer from the east
transformer room



Site: South Bend Lathe RemovalPhoto Number: 16Date: July 26, 2007Direction: EastPhotographer: Jay RauhSubject: Three PCB transformers loaded for transportation and disposal



Site: South Bend Lathe RemovalPhoto Number: 17Date: July 27, 2007Direction: South-SoutheastPhotographer: Jay RauhSubject: ERRS loading waste into a trailer for transportation and disposal

ATTACHMENT B ANALYTICAL RESULTS

ATTACHMENT B1 ASBESTOS AIR SAMPLING RESULTS

Table B1 - Asbestos Air Sampling Results South Bend Lathe Removal South Bend, Indiana June 26 - July 5, 2007

	Sampling	Asbestos	
Sample Name	Date	(Fibers/cc)	Action Level*
SBL-PER01-062607	6/26/2007	< 0.01	0.1
SBL-OPR01-062607	6/26/2007	< 0.01	0.1
SBL-PER02-062707	6/27/2007	< 0.01	0.1
SBL-OPR02-062707	6/27/2007	< 0.01	0.1
SBL-PER03-062807	6/28/2007	< 0.01	0.1
SBL-OPR03-062807	6/28/2007	< 0.01	0.1
SBL-PER04-062907	6/29/2007	< 0.01	0.1
SBL-OPR04-062907	6/29/2007	< 0.01	0.1
SBL-PER04-070507	7/5/2007	N/A ¹	0.1
SBL-OPR04-070507	7/5/2007	N/A ¹	0.1

NOTES:

Analysis done by polarized light microscopy, U.S. EPA Method 600/R-93/116

¹ - Filter overloaded - work was conducted in dusty conditions. Lab technician verbally reported that there were less than 0.01 fibers/cc in sample.

* - Occupational Safety and Health Administration Permissible Exposure Limit for asbestos

< - less than

U.S. EPA - United States Environmental Protection Agency

Fibers/cc - fibers per cubic centimeter of sample

N/A - Not applicable

ATTACHMENT B2 CHARACTERISTICS OF HAZARDOUS WASTE AND MISCELLANEOUS SAMPLING RESULTS

Table B2 – Characteristics of Hazardous Waste and Miscellaneous Sampling Results South Bend Lathe Removal South Bend, Indiana July 12 - 20, 2007

		Sample Name	SBL-S001-071207	SBL-S002-071607	SBL-S003-071607
		Sampling Date	7/12/07	7/17/07	7/17/07
		Sample Matrix	Soil	Soil	Soil
	Regulatory	Location	North UST	South UST	East UST
Parameter	Criteria ¹	Units	Results	Result	Results
Characteristics of Hazardous W	aste				
Flashpoint	140	°F	NA	NA	NA
pH	$\leq 2 \text{ or } \geq 12.5$	SU	NA	NA	NA
Reactive Cyanide	Narrative	mg/kg	NA	NA	NA
Reactive Sulfide	Narrative	mg/kg	NA	NA	NA
Other Analyses					
Percent Moisture	Napp	WT%	7.5	4.7	6.6
Total Petroleum Hydrocarbons	Napp	mg/kg - dry	120	1600	29
Heat Content	Napp	BTU/lb	NA	NA	NA
Chlorine	Napp	mg/kg	NA	NA	NA
Chlorine	Napp	mg/kg	NA	NA	NA

NOTES:

Results in shaded boxes exceed the regulatory level.

¹ - 40 Code of Federal Regulations 261.24

> - Greater than

 \geq - Greater than or equal to

 \leq - Less than or equal to

°F - Degrees Fahrenheit

BTU/lb - British thermal units per pound

mg/kg - Milligrams per kilogram

mg/kg -dry - Milligrams per kilogram dry weight

NA - Not analyzed

Napp - Not applicable

ND - Not detected

SU - Standard units

WT% - weight percent

Table B2 – Characteristics of Hazardous Waste and Miscellaneous Sampling Results South Bend Lathe Removal South Bend, Indiana July 12 - 20, 2007

		Sample Name	PCB-VAULT-TILE	7241 Liquid	Flammable Liquid
		Sampling Date	6/25/2007	6/29/2007	7/19/2007
		Sample Matrix	Solid	Liquid	Flammable Liquid
	Regulatory	Location	West Transformer Room	Room 7241	Various
Parameter	Criteria ¹	Units	Result	Result	Result
Characteristics of Hazardous W	aste				
Flashpoint	140	°F	NA	NA	90
pH	≤2 or ≥12.5	SU	NA	11	NA
Reactive Cyanide	Narrative	mg/kg	NA	NA	NA
Reactive Sulfide	Narrative	mg/kg	NA	NA	NA
Other Analyses					
Percent Moisture	Napp	WT%	NA	NA	NA
Total Petroleum Hydrocarbons	Napp	mg/kg - dry	NA	NA	NA
Heat Content	Napp	BTU/lb	NA	NA	16,100
Chlorine	Napp	mg/kg	NA	NA	3,200
Asbestos Content	Napp	Chrysotile %	78	NA	NA

NOTES:

Results in shaded boxes exceed the regulatory level.

¹ - 40 Code of Federal Regulations 261.24

> - Greater than

 \geq - Greater than or equal to

 \leq - Less than or equal to

°F - Degrees Fahrenheit

BTU/lb - British thermal units per pound

mg/kg - Milligrams per kilogram

mg/kg -dry - Milligrams per kilogram dry weight

NA - Not analyzed

Napp - Not applicable

ND - Not detected

SU - Standard units

WT% - weight percent

Table B2 – Characteristics of Hazardous Waste and Miscellaneous Sampling Results South Bend Lathe Removal South Bend, Indiana July 12 - 20, 2007

		Sample Name	SBL-S004-072007	SBL-W001-071907	SBL-S005-072407
		Sampling Date	7/20/07	7/20/07	7/24/07
		Sample Matrix	Soil	Aqueous	Soil
	Regulatory	Location	West UST	Southwest Sewer	West UST
Parameter	Criteria ¹	Units	Result	Results	Results
Characteristics of Hazardous W	aste				
Flashpoint	140	°F	>170	NA	NA
pH	≤2 or ≥12.5	SU	7.4	9.52	NA
Reactive Cyanide	Narrative	mg/kg	ND	NA	NA
Reactive Sulfide	Narrative	mg/kg	ND	NA	NA
Other Analyses					
Percent Moisture	Napp	WT%	11	NA	5.6
Total Petroleum Hydrocarbons	Napp	mg/kg - dry	1,800	NA	170
Heat Content	Napp	BTU/lb	NA	NA	NA
Chlorine	Napp	mg/kg	NA	NA	NA
Asbestos Content	Napp	Chrysotile %	NA	NA	NA

NOTES:

Results in shaded boxes exceed the regulatory level.

¹ - 40 Code of Federal Regulations 261.24

> - Greater than

 \geq - Greater than or equal to

 \leq - Less than or equal to

°F - Degrees Fahrenheit

BTU/lb - British thermal units per pound

mg/kg - Milligrams per kilogram

mg/kg -dry - Milligrams per kilogram dry weight

NA - Not analyzed

Napp - Not applicable

ND - Not detected

SU - Standard units

WT% - weight percent

ATTACHMENT B3 PCB SAMPLING RESULTS FOR SOIL SAMPLES

	Sample Name	SBL-S001-071207	SBL-S002-071607	SBL-S003-071607	Solids	SBL-S004-072007	SBL-S005-072407
	Sampling Date	7/12/07	7/17/07	7/17/07	7/19/07	7/20/07	7/24/07
	Sample Matrix	Soil	Soil	Soil	Solids	Soil	Soil
	Location	North UST	South UST	East UST	Various	West UST	West UST
Parameter	Units	Results	Results	Results	Results	Results	Results
PCBs							
Aroclor 1016	mg/kg - dry	ND	ND	ND	ND	ND	ND
Aroclor 1221	mg/kg - dry	ND	ND	ND	ND	ND	ND
Aroclor 1232	mg/kg - dry	ND	ND	ND	ND	ND	ND
Aroclor 1242	mg/kg - dry	ND	ND	ND	ND	ND	ND
Aroclor 1248	mg/kg - dry	ND	ND	ND	ND	ND	ND
Aroclor 1254	mg/kg - dry	ND	ND	ND	ND	ND	ND
Aroclor 1260	mg/kg - dry	0.046	ND	ND	ND	0.2	0.091
Aroclor 1262	mg/kg - dry	ND	ND	ND	ND	ND	ND
Aroclor 1268	mg/kg - dry	ND	ND	ND	ND	ND	ND
Total PCBs	mg/kg - dry	0.046	ND	ND	ND	0.2	0.091

NOTES:

mg/kg - dry - Milligrams per kilogram dry weight

ND - Not detected

PCB - Polychlorinated biphenyl

ATTACHMENT B4 TCLP VOC SAMPLING RESULTS

Table B4 – TCLP VOC Sampling Results South Bend Lathe Removal South Bend, Indiana July 19 - 20, 2007

		Sample Name	Solids	SBL-S004-072007
		Sampling Date	7/19/2007	7/20/07
		Sample Matrix	Solids	Soil
	Regulatory	Location	Various	West UST
Parameter	Criteria ¹	Units	Results	Results
TCLP VOCs				
1,1-Dichloroethene	0.7	mg/L	ND	ND
1,2-Dichloroethane	0.5	mg/L	ND	ND
1,4-Dichlorobenzene	7.5	mg/L	ND	ND
2-Butanone	200.0	mg/L	ND	ND
Benzene	0.5	mg/L	ND	ND
Carbon tetrachloride	0.5	mg/L	ND	ND
Chlorobenzene	100.0	mg/L	ND	ND
Chloroform	6.0	mg/L	ND	ND
Tetrachloroethene	0.7	mg/L	ND	ND
Trichloroethene	0.5	mg/L	ND	ND
Vinyl chloride	0.2	mg/L	ND	ND

NOTES:

¹ - 40 Code of Federal Regulations 261.24

mg/L - Milligrams per liter

ND - Not detected

TCLP - Toxicity characteristic leaching procedure

VOC - Volatile organic compound

ATTACHMENT B5 TCLP SVOC SAMPLING RESULTS

Table B5 – TCLP SVOC Sampling Results South Bend Lathe Removal South Bend, Indiana July 19 - 20, 2007

		Sample Name	Solids	SBL-S004-072007
		Sampling Date	7/19/2007	7/20/07
		Sample Matrix	Solids	Soil
	Regulatory	Location	Various	West UST
Parameter	Criteria ¹	Units	Results	Results
TCLP SVOCs				
1,4-Dichlorobenzene	7.5	mg/L	ND	ND
2,4,5-Trichlorophenol	400.0	mg/L	ND	ND
2,4,6-Trichlorophenol	2.0	mg/L	ND	ND
2,4-Dinitrotoluene	0.13	mg/L	ND	ND
2-Methylphenol	200.0	mg/L	ND	ND
3/4-Methylphenol	200.0	mg/L	ND	ND
Hexachlorobenzene	0.13	mg/L	ND	ND
Hexachlorobutadiene	0.5	mg/L	ND	ND
Hexachloroethane	3.0	mg/L	ND	ND
Nitrobenzene	2.0	mg/L	ND	ND
Pentachlorophenol	100.0	mg/L	ND	ND
Pyridine	5.0	mg/L	ND	ND
Total Cresol	200.0	mg/L	ND	ND

NOTES:

¹ - 40 Code of Federal Regulations 261.24

mg/L - Milligrams per liter

ND - Not detected

SVOC - Semivolatile organic compound

TCLP - Toxicity characteristic leaching procedure

ATTACHMENT B6 TCLP METALS SAMPLING RESULTS

Table B6 – TCLP Metals Sampling Results South Bend Lathe Removal South Bend, Indiana July 19 - 20, 2007

		Sample Name	Solids	SBL-S004-072007
		Sampling Date	7/19/2007	7/20/07
		Sample Matrix	Solids	Soil
	Regulatory	Location	Various	West UST
Parameter	Criteria ¹	Units	Results	Results
TCLP Metals				
Arsenic	5.0	mg/L	0.013	ND
Barium	100.0	mg/L	160	1.3
Cadmium	1.0	mg/L	0.01	0.008
Chromium	5.0	mg/L	0.0086	ND
Lead	5.0	mg/L	0.0087	0.29
Selenium	1.0	mg/L	0.031	ND
Silver	5.0	mg/L	ND	ND
Mercury	0.2	mg/L	ND	ND

NOTES:

¹ - 40 Code of Federal Regulations 261.24

mg/L - Milligrams per liter

ND - Not detected

TCLP - Toxicity characteristic leaching procedure

ATTACHMENT B7 SVOC SAMPLING RESULTS FOR SOIL SAMPLES

	Sample Name	SBL-S001-071207	SBL-S002-071607
	Sampling Date	7/12/07	7/17/07
	Sample Matrix	Soil	Soil
	Location	North UST	South UST
Parameter	Units	Results	Result
Total SVOCs		•	
1,2,4-Trichlorobenzene	mg/kg - dry	ND	ND
1,2-Dichlorobenzene	mg/kg - dry	ND	ND
1,2-Diphenyl-hydrazine	mg/kg - dry	ND	ND
1,3-Dichlorobenzene	mg/kg - dry	ND	ND
1,4-Dichlorobenzene	mg/kg - dry	ND	ND
2,4,5-Trichlorophenol	mg/kg - dry	ND	ND
2,4,6-Trichlorophenol	mg/kg - dry	ND	ND
2,4-Dichlorophenol	mg/kg - dry	ND	ND
2,4-Dimethylphenol	mg/kg - dry	ND	ND
2,4-Dinitrophenol	mg/kg - dry	ND	ND
2,4-Dinitrotoluene	mg/kg - dry	ND	ND
2,6-Dichlorophenol	mg/kg - dry	ND	ND
2,6-Dinitrotoluene	mg/kg - dry	ND	ND
2-Chloronaphthalene	mg/kg - dry	ND	ND
2-Chlorophenol	mg/kg - dry	ND	ND
2-Methylnaphthalene	mg/kg - dry	ND	ND
2-Methylphenol	mg/kg - dry	ND	ND
2-Nitroaniline	mg/kg - dry	ND	ND
2-Nitrophenol	mg/kg - dry	ND	ND
3,3´-Dichlorobenzidine	mg/kg - dry	ND	ND
3-Nitroaniline	mg/kg - dry	ND	ND
3/4-Methylphenol	mg/kg - dry	ND	ND
4,6-Dinitro-2-methylphenol	mg/kg - dry	ND	ND
4-Bromophenyl phenyl ether	mg/kg - dry	ND	ND
4-Chloro-3-methylphenol	mg/kg - dry	ND	ND
4-Chloroaniline	mg/kg - dry	ND	ND
4-Chlorophenyl phenyl ether	mg/kg - dry	ND	ND
4-Nitroaniline	mg/kg - dry	ND	ND
4-Nitrophenol	mg/kg - dry	ND	ND
Acenaphthene	mg/kg - dry	ND	ND
Acenaphthylene	mg/kg - dry	ND	ND
Acetophenone	mg/kg - dry	ND	ND
Aniline	mg/kg - dry	ND	ND
Anthracene	mg/kg - dry	ND	ND
Benzidine	mg/kg - dry	ND	ND

	Sample Name	SBL-S001-071207	SBL-S002-071607
	Sampling Date	7/12/07	7/17/07
	Sample Matrix	Soil	Soil
	Location	North UST	South UST
Parameter	Units	Results	Result
Total SVOCs			
Benzo[a]anthracene	mg/kg - dry	0.52	ND
Benzo[a]pyrene	mg/kg - dry	0.37	ND
Benzo[b]fluoranthene	mg/kg - dry	ND	ND
Benzo[g,h,i]perylene	mg/kg - dry	0.51	ND
Benzo[k]fluoranthene	mg/kg - dry	ND	ND
Benzoic acid	mg/kg - dry	ND	ND
Benzyl alcohol	mg/kg - dry	ND	ND
Bis(2-chloroethoxy)methane	mg/kg - dry	ND	ND
Bis(2-chloroethyl)ether	mg/kg - dry	ND	ND
Bis(2-chloroisopropyl)ether	mg/kg - dry	ND	ND
Bis(2-ethylhexyl)phthalate	mg/kg - dry	ND	ND
Butyl benzyl phthalate	mg/kg - dry	ND	ND
Carbazole	mg/kg - dry	ND	ND
Chrysene	mg/kg - dry	0.56	ND
Di-n-butyl phthalate	mg/kg - dry	ND	ND
Di-n-octyl phthalate	mg/kg - dry	ND	ND
Dibenz[a,h]anthracene	mg/kg - dry	ND	ND
Dibenzofuran	mg/kg - dry	ND	ND
Diethyl phthalate	mg/kg - dry	ND	ND
Dimethyl phthalate	mg/kg - dry	ND	ND
Fluoranthene	mg/kg - dry	1.3	ND
Fluorene	mg/kg - dry	ND	ND
Hexachlorobenzene	mg/kg - dry	ND	ND
Hexachlorobutadiene	mg/kg - dry	ND	ND
Hexachlorocyclopentadiene	mg/kg - dry	ND	ND
Hexachloroethane	mg/kg - dry	ND	ND
Indeno[1,2,3cd]pyrene	mg/kg - dry	ND	ND
Isophorone	mg/kg - dry	ND	ND
N-Nitrosodi-n-propylamine	mg/kg - dry	ND	ND
N-Nitrosodimethylamine	mg/kg - dry	ND	ND
N-Nitrosodiphenylamine	mg/kg - dry	ND	ND
Naphthalene	mg/kg - dry	ND	ND
Nitrobenzene	mg/kg - dry	ND	ND
Pentachlorophenol	mg/kg - dry	ND	ND
Phenanthrene	mg/kg - dry	0.62	ND

	Sample Name	SBL-S001-071207	SBL-S002-071607
	Sampling Date	7/12/07	7/17/07
	Sample Matrix	Soil	Soil
	Location	North UST	South UST
Parameter	Units	Results	Result
Total SVOCs			
Phenol	mg/kg - dry	ND	ND
Pyrene	mg/kg - dry	0.92	ND
Pyridine	mg/kg - dry	ND	ND
Total Cresol	mg/kg - dry	ND	ND

NOTES:

mg/kg - dry - Milligrams per kilogram dry weight

ND - Not detected

SVOC - Semivolatile organic compound

	Sample Name	SBL-S003-071607	SBL-S004-072007
	Sampling Date	7/17/07	7/20/07
	Sample Matrix	Soil	Soil
	Location	East UST	West UST
Parameter	Units	Results	Result
Total SVOCs			
1,2,4-Trichlorobenzene	mg/kg - dry	ND	ND
1,2-Dichlorobenzene	mg/kg - dry	ND	ND
1,2-Diphenyl-hydrazine	mg/kg - dry	ND	ND
1,3-Dichlorobenzene	mg/kg - dry	ND	ND
1,4-Dichlorobenzene	mg/kg - dry	ND	ND
2,4,5-Trichlorophenol	mg/kg - dry	ND	ND
2,4,6-Trichlorophenol	mg/kg - dry	ND	ND
2,4-Dichlorophenol	mg/kg - dry	ND	ND
2,4-Dimethylphenol	mg/kg - dry	ND	ND
2,4-Dinitrophenol	mg/kg - dry	ND	ND
2,4-Dinitrotoluene	mg/kg - dry	ND	ND
2,6-Dichlorophenol	mg/kg - dry	ND	ND
2,6-Dinitrotoluene	mg/kg - dry	ND	ND
2-Chloronaphthalene	mg/kg - dry	ND	ND
2-Chlorophenol	mg/kg - dry	ND	ND
2-Methylnaphthalene	mg/kg - dry	ND	ND
2-Methylphenol	mg/kg - dry	ND	ND
2-Nitroaniline	mg/kg - dry	ND	ND
2-Nitrophenol	mg/kg - dry	ND	ND
3,3´-Dichlorobenzidine	mg/kg - dry	ND	ND
3-Nitroaniline	mg/kg - dry	ND	ND
3/4-Methylphenol	mg/kg - dry	ND	ND
4,6-Dinitro-2-methylphenol	mg/kg - dry	ND	ND
4-Bromophenyl phenyl ether	mg/kg - dry	ND	ND
4-Chloro-3-methylphenol	mg/kg - dry	ND	ND
4-Chloroaniline	mg/kg - dry	ND	ND
4-Chlorophenyl phenyl ether	mg/kg - dry	ND	ND
4-Nitroaniline	mg/kg - dry	ND	ND
4-Nitrophenol	mg/kg - dry	ND	ND
Acenaphthene	mg/kg - dry	ND	ND
Acenaphthylene	mg/kg - dry	ND	ND
Acetophenone	mg/kg - dry	ND	ND
Aniline	mg/kg - dry	ND	ND
Anthracene	mg/kg - dry	ND	ND
Benzidine	mg/kg - dry	ND	ND

	Sample Name	SBL-S003-071607	SBL-S004-072007
	Sampling Date	7/17/07	7/20/07
	Sample Matrix	Soil	Soil
	Location	East UST	West UST
Parameter	Units	Results	Result
Total SVOCs			
Benzo[a]anthracene	mg/kg - dry	ND	ND
Benzo[a]pyrene	mg/kg - dry	ND	ND
Benzo[b]fluoranthene	mg/kg - dry	ND	ND
Benzo[g,h,i]perylene	mg/kg - dry	ND	ND
Benzo[k]fluoranthene	mg/kg - dry	ND	ND
Benzoic acid	mg/kg - dry	ND	ND
Benzyl alcohol	mg/kg - dry	ND	ND
Bis(2-chloroethoxy)methane	mg/kg - dry	ND	ND
Bis(2-chloroethyl)ether	mg/kg - dry	ND	ND
Bis(2-chloroisopropyl)ether	mg/kg - dry	ND	ND
Bis(2-ethylhexyl)phthalate	mg/kg - dry	ND	ND
Butyl benzyl phthalate	mg/kg - dry	ND	ND
Carbazole	mg/kg - dry	ND	ND
Chrysene	mg/kg - dry	ND	ND
Di-n-butyl phthalate	mg/kg - dry	ND	ND
Di-n-octyl phthalate	mg/kg - dry	ND	ND
Dibenz[a,h]anthracene	mg/kg - dry	ND	ND
Dibenzofuran	mg/kg - dry	ND	ND
Diethyl phthalate	mg/kg - dry	ND	ND
Dimethyl phthalate	mg/kg - dry	ND	ND
Fluoranthene	mg/kg - dry	0.42	0.74
Fluorene	mg/kg - dry	ND	ND
Hexachlorobenzene	mg/kg - dry	ND	ND
Hexachlorobutadiene	mg/kg - dry	ND	ND
Hexachlorocyclopentadiene	mg/kg - dry	ND	ND
Hexachloroethane	mg/kg - dry	ND	ND
Indeno[1,2,3cd]pyrene	mg/kg - dry	ND	ND
Isophorone	mg/kg - dry	ND	ND
N-Nitrosodi-n-propylamine	mg/kg - dry	ND	ND
N-Nitrosodimethylamine	mg/kg - dry	ND	ND
N-Nitrosodiphenylamine	mg/kg - dry	ND	ND
Naphthalene	mg/kg - dry	ND	0.6
Nitrobenzene	mg/kg - dry	ND	ND
Pentachlorophenol	mg/kg - dry	ND	ND
Phenanthrene	mg/kg - dry	ND	0.59

	Sample Name	SBL-S003-071607	SBL-S004-072007
	Sampling Date	7/17/07	7/20/07
	Sample Matrix	Soil	Soil
	Location	East UST	West UST
Parameter	Units	Results	Result
Total SVOCs			
Phenol	mg/kg - dry	ND	ND
Pyrene	mg/kg - dry	0.39	0.86
Pyridine	mg/kg - dry	ND	ND
Total Cresol	mg/kg - dry	ND	ND

NOTES:

mg/kg - dry - Milligrams per kilogram dry weight

ND - Not detected

SVOC - Semivolatile organic compound

	Sample Name	SBL-S005-072407
	Sampling Date	7/24/07
	Sample Matrix	Soil
	Location	West UST
Parameter	Units	Result
Total SVOCs		
1,2,4-Trichlorobenzene	mg/kg - dry	ND
1,2-Dichlorobenzene	mg/kg - dry	ND
1,2-Diphenyl-hydrazine	mg/kg - dry	ND
1,3-Dichlorobenzene	mg/kg - dry	ND
1,4-Dichlorobenzene	mg/kg - dry	ND
2,4,5-Trichlorophenol	mg/kg - dry	ND
2,4,6-Trichlorophenol	mg/kg - dry	ND
2,4-Dichlorophenol	mg/kg - dry	ND
2,4-Dimethylphenol	mg/kg - dry	ND
2,4-Dinitrophenol	mg/kg - dry	ND
2,4-Dinitrotoluene	mg/kg - dry	ND
2,6-Dichlorophenol	mg/kg - dry	ND
2,6-Dinitrotoluene	mg/kg - dry	ND
2-Chloronaphthalene	mg/kg - dry	ND
2-Chlorophenol	mg/kg - dry	ND
2-Methylnaphthalene	mg/kg - dry	ND
2-Methylphenol	mg/kg - dry	ND
2-Nitroaniline	mg/kg - dry	ND
2-Nitrophenol	mg/kg - dry	ND
3,3'-Dichlorobenzidine	mg/kg - dry	ND
3-Nitroaniline	mg/kg - dry	ND
3/4-Methylphenol	mg/kg - dry	ND
4,6-Dinitro-2-methylphenol	mg/kg - dry	ND
4-Bromophenyl phenyl ether	mg/kg - dry	ND
4-Chloro-3-methylphenol	mg/kg - dry	ND
4-Chloroaniline	mg/kg - dry	ND
4-Chlorophenyl phenyl ether	mg/kg - dry	ND
4-Nitroaniline	mg/kg - dry	ND
4-Nitrophenol	mg/kg - dry	ND
Acenaphthene	mg/kg - dry	ND
Acenaphthylene	mg/kg - dry	ND
Acetophenone	mg/kg - dry	ND
Aniline	mg/kg - dry	ND
Anthracene	mg/kg - dry	ND
Benzidine	mg/kg - dry	ND

	Sample Name	SBL-S005-072407
	Sampling Date	7/24/07
	Sample Matrix	Soil
	Location	West UST
Parameter	Units	Result
Total SVOCs		,
Benzo[a]anthracene	mg/kg - dry	ND
Benzo[a]pyrene	mg/kg - dry	ND
Benzo[b]fluoranthene	mg/kg - dry	ND
Benzo[g,h,i]perylene	mg/kg - dry	ND
Benzo[k]fluoranthene	mg/kg - dry	ND
Benzoic acid	mg/kg - dry	ND
Benzyl alcohol	mg/kg - dry	ND
Bis(2-chloroethoxy)methane	mg/kg - dry	ND
Bis(2-chloroethyl)ether	mg/kg - dry	ND
Bis(2-chloroisopropyl)ether	mg/kg - dry	ND
Bis(2-ethylhexyl)phthalate	mg/kg - dry	ND
Butyl benzyl phthalate	mg/kg - dry	ND
Carbazole	mg/kg - dry	ND
Chrysene	mg/kg - dry	ND
Di-n-butyl phthalate	mg/kg - dry	ND
Di-n-octyl phthalate	mg/kg - dry	ND
Dibenz[a,h]anthracene	mg/kg - dry	ND
Dibenzofuran	mg/kg - dry	ND
Diethyl phthalate	mg/kg - dry	ND
Dimethyl phthalate	mg/kg - dry	ND
Fluoranthene	mg/kg - dry	ND
Fluorene	mg/kg - dry	ND
Hexachlorobenzene	mg/kg - dry	ND
Hexachlorobutadiene	mg/kg - dry	ND
Hexachlorocyclopentadiene	mg/kg - dry	ND
Hexachloroethane	mg/kg - dry	ND
Indeno[1,2,3cd]pyrene	mg/kg - dry	ND
Isophorone	mg/kg - dry	ND
N-Nitrosodi-n-propylamine	mg/kg - dry	ND
N-Nitrosodimethylamine	mg/kg - dry	ND
N-Nitrosodiphenylamine	mg/kg - dry	ND
Naphthalene	mg/kg - dry	ND
Nitrobenzene	mg/kg - dry	ND
Pentachlorophenol	mg/kg - dry	ND
Phenanthrene	mg/kg - dry	ND

	Sample Name	SBL-S005-072407
	Sampling Date	7/24/07
	Sample Matrix	Soil
	Location	West UST
Parameter	Units	Result
Total SVOCs		
Phenol	mg/kg - dry	ND
Pyrene	mg/kg - dry	ND
Pyridine	mg/kg - dry	ND
Total Cresol	mg/kg - dry	ND

NOTES:

mg/kg - dry - Milligrams per kilogram dry weight

ND - Not detected

SVOC - Semivolatile organic compound

ATTACHMENT B8 VOC SAMPLING RESULTS FOR SOIL SAMPLES

	Sample Name	SBL-S001-071207	SBL-S002-071607	SBL-S003-071607
	Sampling Date	7/12/07	7/17/07	7/17/07
	Sample Matrix	Soil	Soil	Soil
	Location	North UST	South UST	East UST
Parameter	Units	Results	Result	Results
Total VOCs				
1,1,1,2-Tetrachloroethane	mg/kg - dry	ND	ND	ND
1,1,1-Trichloroethane	mg/kg - dry	ND	ND	ND
1,1,2,2-Tetrachloroethane	mg/kg - dry	ND	ND	ND
1,1,2-Trichloroethane	mg/kg - dry	ND	ND	ND
1,1-Dichloroethane	mg/kg - dry	ND	ND	ND
1,1-Dichloroethene	mg/kg - dry	ND	ND	ND
1,2-Dichloroethane	mg/kg - dry	ND	ND	ND
1,2-Dichloropropane	mg/kg - dry	ND	ND	ND
2-Butanone	mg/kg - dry	ND	ND	ND
2-Hexanone	mg/kg - dry	ND	ND	ND
4-Methyl-2-Pentanone	mg/kg - dry	ND	ND	ND
Acetone	mg/kg - dry	ND	ND	ND
Acrolein	mg/kg - dry	ND	ND	ND
Acrylonitrile	mg/kg - dry	ND	ND	ND
Benzene	mg/kg - dry	ND	ND	ND
Bromodichloromethane	mg/kg - dry	ND	ND	ND
Bromoform	mg/kg - dry	ND	ND	ND
Bromomethane	mg/kg - dry	ND	ND	ND
Carbon Disulfide	mg/kg - dry	ND	ND	ND
Carbon tetrachloride	mg/kg - dry	ND	ND	ND
Chlorobenzene	mg/kg - dry	ND	ND	ND
Chloroethane	mg/kg - dry	ND	ND	ND
Chloroform	mg/kg - dry	ND	ND	ND
Chloromethane	mg/kg - dry	ND	ND	ND
cis-1,2-Dichloroethene	mg/kg - dry	ND	0.0075	ND
cis-1,3-Dichloropropene	mg/kg - dry	ND	ND	ND
Dibromochloromethane	mg/kg - dry	ND	ND	ND
Ethylbenzene	mg/kg - dry	ND	ND	ND
m,p-Xylene	mg/kg - dry	ND	ND	ND
Methyl-t-Butyl Ether	mg/kg - dry	ND	ND	ND
Methylene chloride	mg/kg - dry	ND	ND	ND
o-Xylene	mg/kg - dry	ND	ND	ND
Styrene	mg/kg - dry	ND	ND	ND
Tetrachloroethene	mg/kg - dry	ND	0.056	ND
Toluene	mg/kg - dry	ND	ND	ND

	Sample Name	SBL-S001-071207	SBL-S002-071607	SBL-S003-071607
	Sampling Date	7/12/07	7/17/07	7/17/07
	Sample Matrix	Soil	Soil	Soil
	Location	North UST	South UST	East UST
Parameter	Units	Results	Result	Results
Total VOCs				
Total Xylenes	mg/kg - dry	ND	ND	ND
trans-1,2-Dichloroethene	mg/kg - dry	ND	ND	ND
trans-1,3-Dichloropropene	mg/kg - dry	ND	ND	ND
Trichloroethene	mg/kg - dry	ND	0.02	ND
Trichlorofluoromethane	mg/kg - dry	ND	ND	ND
Vinyl Acetate	mg/kg - dry	ND	ND	ND
Vinyl chloride	mg/kg - dry	ND	ND	ND

NOTES:

mg/kg - dry - Milligrams per kilogram dry weight

ND - Not detected

VOC - Volatile organic compound

	Sample Name	SBL-S004-072007	SBL-S005-072407
	Sampling Date	7/20/07	7/24/07
	Sample Matrix	Soil	Soil
	Location	West UST	West UST
Parameter	Units	Result	Result
Total VOCs			
1,1,1,2-Tetrachloroethane	mg/kg - dry	ND	ND
1,1,1-Trichloroethane	mg/kg - dry	ND	ND
1,1,2,2-Tetrachloroethane	mg/kg - dry	ND	ND
1,1,2-Trichloroethane	mg/kg - dry	ND	ND
1,1-Dichloroethane	mg/kg - dry	ND	ND
1,1-Dichloroethene	mg/kg - dry	ND	ND
1,2-Dichloroethane	mg/kg - dry	ND	ND
1,2-Dichloropropane	mg/kg - dry	ND	ND
2-Butanone	mg/kg - dry	ND	ND
2-Hexanone	mg/kg - dry	ND	ND
4-Methyl-2-Pentanone	mg/kg - dry	ND	ND
Acetone	mg/kg - dry	ND	ND
Acrolein	mg/kg - dry	ND	ND
Acrylonitrile	mg/kg - dry	ND	ND
Benzene	mg/kg - dry	ND	ND
Bromodichloromethane	mg/kg - dry	ND	ND
Bromoform	mg/kg - dry	ND	ND
Bromomethane	mg/kg - dry	ND	ND
Carbon Disulfide	mg/kg - dry	ND	ND
Carbon tetrachloride	mg/kg - dry	ND	ND
Chlorobenzene	mg/kg - dry	ND	ND
Chloroethane	mg/kg - dry	ND	ND
Chloroform	mg/kg - dry	ND	ND
Chloromethane	mg/kg - dry	ND	ND
cis-1,2-Dichloroethene	mg/kg - dry	ND	ND
cis-1,3-Dichloropropene	mg/kg - dry	ND	ND
Dibromochloromethane	mg/kg - dry	ND	ND
Ethylbenzene	mg/kg - dry	ND	ND
m,p-Xylene	mg/kg - dry	0.3	ND
Methyl-t-Butyl Ether	mg/kg - dry	ND	ND
Methylene chloride	mg/kg - dry	ND	ND
o-Xylene	mg/kg - dry	0.54	ND
Styrene	mg/kg - dry	ND	ND
Tetrachloroethene	mg/kg - dry	ND	ND
Toluene	mg/kg - dry	ND	ND

	Sample Name	SBL-S004-072007	SBL-S005-072407
	Sampling Date	7/20/07	7/24/07
	Sample Matrix	Soil	Soil
	Location	West UST	West UST
Parameter	Units	Result	Result
Total VOCs			
Total Xylenes	mg/kg - dry	0.84	ND
trans-1,2-Dichloroethene	mg/kg - dry	ND	ND
trans-1,3-Dichloropropene	mg/kg - dry	ND	ND
Trichloroethene	mg/kg - dry	ND	ND
Trichlorofluoromethane	mg/kg - dry	ND	ND
Vinyl Acetate	mg/kg - dry	ND	ND
Vinyl chloride	mg/kg - dry	ND	ND

NOTES:

mg/kg - dry - Milligrams per kilogram dry weight

ND - Not detected

VOC - Volatile organic compound

ATTACHMENT B9 PCB SAMPLING RESULTS FOR LIQUID SAMPLES

Sample Name	Flammab	le Liquid	SBL-W001-071907	
Sampling Date	7/19	9/07	7/2	0/07
Sample Matrix	Flammab	le Liquid	Lic	quid
Location	Var	ious	Southwe	est Sewer
Parameter	Results	Units	Results	Units
PCBs				
Aroclor 1016	ND	mg/kg	ND	mg/L
Aroclor 1221	ND	mg/kg	ND	mg/L
Aroclor 1232	ND	mg/kg	ND	mg/L
Aroclor 1242	ND	mg/kg	ND	mg/L
Aroclor 1248	ND	mg/kg	ND	mg/L
Aroclor 1254	ND	mg/kg	ND	mg/L
Aroclor 1260	ND	mg/kg	0.038	mg/L
Aroclor 1262	ND	mg/kg	ND	mg/L
Aroclor 1268	ND	mg/kg	ND	mg/L
Total PCBs	ND	mg/kg	0.038	mg/L

NOTES:

mg/kg - Milligrams per kilogram

mg/L - Milligrams per liter

ND - Not detected

PCB - Polychlorinated biphenyl

ATTACHMENT B10 SVOC SAMPLING RESULTS FOR LIQUID SAMPLES

Sample Name	Flammable Liquid SBL-			01-071907
Sampling Date	7/19	7/19/2007		0/07
Sample Matrix	Flammable Liquid		Liquid	
Location	Var	Various		est Sewer
Parameter	Result	Units	Results	Units
SVOCs				
1,2,4-Trichlorobenzene	ND	mg/kg	ND	mg/L
1,2-Dichlorobenzene	ND	mg/kg	ND	mg/L
1,2-Diphenyl-hydrazine	ND	mg/kg	ND	mg/L
1,3-Dichlorobenzene	ND	mg/kg	ND	mg/L
1,4-Dichlorobenzene	ND	mg/kg	ND	mg/L
2,4,5-Trichlorophenol	ND	mg/kg	ND	mg/L
2,4,6-Trichlorophenol	ND	mg/kg	ND	mg/L
2,4-Dichlorophenol	ND	mg/kg	ND	mg/L
2,4-Dimethylphenol	ND	mg/kg	ND	mg/L
2,4-Dinitrophenol	ND	mg/kg	ND	mg/L
2,4-Dinitrotoluene	ND	mg/kg	ND	mg/L
2,6-Dichlorophenol	ND	mg/kg	ND	mg/L
2,6-Dinitrotoluene	ND	mg/kg	ND	mg/L
2-Chloronaphthalene	ND	mg/kg	ND	mg/L
2-Chlorophenol	ND	mg/kg	0.019	mg/L
2-Methylnaphthalene	410	mg/kg	ND	mg/L
2-Methylphenol	ND	mg/kg	ND	mg/L
2-Nitroaniline	ND	mg/kg	ND	mg/L
2-Nitrophenol	ND	mg/kg	ND	mg/L
3,3´-Dichlorobenzidine	ND	mg/kg	ND	mg/L
3-Nitroaniline	ND	mg/kg	ND	mg/L
3/4-Methylphenol	ND	mg/kg	ND	mg/L
4,6-Dinitro-2-methylphenol	ND	mg/kg	ND	mg/L
4-Bromophenyl phenyl ether	ND	mg/kg	ND	mg/L
4-Chloro-3-methylphenol	ND	mg/kg	ND	mg/L
4-Chloroaniline	ND	mg/kg	ND	mg/L
4-Chlorophenyl phenyl ether	ND	mg/kg	ND	mg/L
4-Nitroaniline	ND	mg/kg	ND	mg/L
4-Nitrophenol	ND	mg/kg	ND	mg/L
Acenaphthene	ND	mg/kg	ND	mg/L
Acenaphthylene	ND	mg/kg	ND	mg/L
Acetophenone	ND	mg/kg	ND	mg/L
Aniline	ND	mg/kg	ND	mg/L
Anthracene	ND	mg/kg	ND	mg/L

Sample Name	Flammable Liquid SBL-W001-07190			01-071907
Sampling Date		7/19/2007		0/07
Sample Matrix	Flammable Liquid		Liquid	
Location	Va	Various		est Sewer
Parameter	Result	Units	Results	Units
SVOCs				
Benzidine	ND	mg/kg	ND	mg/L
Benzo[a]anthracene	ND	mg/kg	ND	mg/L
Benzo[a]pyrene	ND	mg/kg	0.013	mg/L
Benzo[b]fluoranthene	ND	mg/kg	0.013	mg/L
Benzo[g,h,i]perylene	ND	mg/kg	ND	mg/L
Benzo[k]fluoranthene	ND	mg/kg	0.012	mg/L
Benzoic acid	ND	mg/kg	ND	mg/L
Benzyl alcohol	ND	mg/kg	ND	mg/L
Bis(2-chloroethoxy)methane	ND	mg/kg	ND	mg/L
Bis(2-chloroethyl)ether	ND	mg/kg	ND	mg/L
Bis(2-chloroisopropyl)ether	ND	mg/kg	ND	mg/L
Bis(2-ethylhexyl)phthalate	87	mg/kg	0.063	mg/L
Butyl benzyl phthalate	ND	mg/kg	ND	mg/L
Carbazole	ND	mg/kg	ND	mg/L
Chrysene	ND	mg/kg	ND	mg/L
Di-n-butyl phthalate	ND	mg/kg	ND	mg/L
Di-n-octyl phthalate	ND	mg/kg	0.052	mg/L
Dibenz[a,h]anthracene	ND	mg/kg	ND	mg/L
Dibenzofuran	ND	mg/kg	ND	mg/L
Diethyl phthalate	ND	mg/kg	ND	mg/L
Dimethyl phthalate	ND	mg/kg	ND	mg/L
Fluoranthene	ND	mg/kg	ND	mg/L
Fluorene	ND	mg/kg	ND	mg/L
Hexachlorobenzene	ND	mg/kg	ND	mg/L
Hexachlorobutadiene	ND	mg/kg	ND	mg/L
Hexachlorocyclopentadiene	ND	mg/kg	ND	mg/L
Hexachloroethane	ND	mg/kg	ND	mg/L
Indeno[1,2,3cd]pyrene	ND	mg/kg	ND	mg/L
Isophorone	ND	mg/kg	ND	mg/L
N-Nitrosodi-n-propylamine	ND	mg/kg	ND	mg/L
N-Nitrosodimethylamine	ND	mg/kg	ND	mg/L
N-Nitrosodiphenylamine	42	mg/kg	ND	mg/L
Naphthalene	320	mg/kg	ND	mg/L

Sample Name	Flammable Liquid		SBL-W001-071907		
Sampling Date	7/19/2007		7/20/07		
Sample Matrix	Flammable Liquid		Liquid		
Location	Various		Southwest Sewer		
Parameter	Result	Units	Results	Units	
SVOCs					
Nitrobenzene	ND	mg/kg	ND	mg/L	
Pentachlorophenol	ND	mg/kg	ND	mg/L	
Phenanthrene	49	mg/kg	ND	mg/L	
Phenol	ND	mg/kg	ND	mg/L	
Pyrene	ND	mg/kg	ND	mg/L	
Pyridine	ND	mg/kg	ND	mg/L	
Total Cresol	ND	mg/kg	ND	mg/L	

NOTES:

mg/kg - Milligrams per kilogram

mg/L - Milligrams per liter

ND - Not detected

SVOC - Semivolatile organic compound

ATTACHMENT B11 VOC SAMPLING RESULTS FOR LIQUID SAMPLES

Sample Name	Flammable Liquid SBL-W001-071907					
Sampling Date	7/19/2007		7/20/07			
Sample Matrix	Flammable Liquid		Liquid			
Location	Various		Southwest Sewer			
Parameter	Result Units		Results Units			
VOCs						
1,1,1,2-Tetrachloroethane	ND	mg/kg	ND	mg/L		
1,1,1-Trichloroethane	ND	mg/kg	ND	mg/L		
1,1,2,2-Tetrachloroethane	ND	mg/kg	ND	mg/L		
1,1,2-Trichloroethane	ND	mg/kg	ND	mg/L		
1,1-Dichloroethane	ND	mg/kg	ND	mg/L		
1,1-Dichloroethene	ND	mg/kg	ND	mg/L		
1,2-Dichloroethane	ND	mg/kg	ND	mg/L		
1,2-Dichloropropane	ND	mg/kg	ND	mg/L		
2-Hexanone	ND	mg/kg	ND	mg/L		
4-Methyl-2-Pentanone	7,100	mg/kg	ND	mg/L		
Acetone	ND	mg/kg	ND	mg/L		
Acrolein	ND	mg/kg	ND	mg/L		
Acrylonitrile	ND	mg/kg	ND	mg/L		
Benzene	23	mg/kg	ND	mg/L		
Bromodichloromethane	ND	mg/kg	ND	mg/L		
Bromoform	ND	mg/kg	ND	mg/L		
Bromomethane	ND	mg/kg	ND	mg/L		
Carbon Disulfide	ND	mg/kg	ND	mg/L		
Carbon tetrachloride	ND	mg/kg	ND	mg/L		
Chlorobenzene	ND	mg/kg	ND	mg/L		
Chloroethane	ND	mg/kg	ND	mg/L		
Chloroform	ND	mg/kg	ND	mg/L		
Chloromethane	ND	mg/kg	ND	mg/L		
cis-1,2-Dichloroethene	ND	mg/kg	ND	mg/L		
cis-1,3-Dichloropropene	ND	mg/kg	ND	mg/L		
Dibromochloromethane	ND	mg/kg	ND	mg/L		
Ethylbenzene	1,800	mg/kg	ND	mg/L		
m,p-Xylene	4,400	mg/kg	ND	mg/L		
Methyl-t-Butyl Ether	4.7	mg/kg	ND	mg/L		
Methylene chloride	ND	mg/kg	ND	mg/L		
o-Xylene	1,500	mg/kg	ND	mg/L		
Styrene	ND	mg/kg	ND	mg/L		
Tetrachloroethene	ND	mg/kg	ND	mg/L		
Toluene	940	mg/kg	ND	mg/L		

Sample Name	Flammable Liquid		SBL-W001-071907		
Sampling Date	7/19/2007		7/20/07		
Sample Matrix	Flammable Liquid		Liquid		
Location	Various		Southwest Sewer		
Parameter	Result	Units	Results	Units	
VOCs					
Total Xylenes	5,900	mg/kg	ND	mg/L	
trans-1,2-Dichloroethene	ND	mg/kg	ND	mg/L	
trans-1,3-Dichloropropene	ND	mg/kg	ND	mg/L	
Trichloroethene	ND	mg/kg	ND	mg/L	
Trichlorofluoromethane	ND	mg/kg	ND	mg/L	
Vinyl Acetate	ND	mg/kg	ND	mg/L	
Vinyl chloride	ND	mg/kg	ND	mg/L	
2-Butanone	ND	mg/kg	0.32	mg/L	

NOTES:

mg/kg - Milligrams per kilogram

mg/L - Milligrams per liter

ND - Not detected

VOC - Volatile organic compound

ATTACHMENT B12 TOTAL METALS SAMPLING RESULTS FOR LIQUID SAMPLES

TOTAL WETALS SAWI LING RESOLTS FOR EIGOID SAWI LES

Table B12 – Total Metals Sampling Results for Liquid Samples South Bend Lathe Removal South Bend, Indiana July 20, 2007

	Sample Name	SBL-W001-071907
	Sampling Date	7/20/07
	Sample Matrix	Liquid
	Location	Southwest Sewer
Parameter	Units	Results
Total Metals	8	
Arsenic	mg/L	1.4
Barium	mg/L	0.31
Cadmium	mg/L	ND
Chromium	mg/L	0.015
Lead	mg/L	ND
Selenium	mg/L	ND
Silver	mg/L	ND
Mercury	mg/L	ND

NOTES:

mg/L - Milligrams per liter

ND - Not detected