

March 24, 2000

Via Certified Mail No. Z 264 569 833

STID 3279

Mr. Robert M. Senga, Unit Chief California Environmental Protection Agency Department of Toxic Substances Control Southern California Region 5796 Corporate Avenue Cypress, California 90630

Re:

**Quarterly Progress Report** 

December 1999 through February 2000 Safety-Kleen Systems, Inc., Service Center 400 Market Street Oakland, California

Dear Mr. Senga:

Enclosed are three copies of the Quarterly Progress Report which summarizes the groundwater monitoring at the above-referenced facility. This report covers the period of December 1999 through February 2000. Safety-Kleen Systems, Inc. (Safety-Kleen) is following the modified groundwater sampling schedule as described in the letter submitted on October 8, 1998, and as modified and approved by Alameda County Environmental Health Services in a response letter dated November 17, 1998, with the exception that monitoring well MW-9 continue to be sampled quarterly. As requested by Alameda County, Safety-Kleen will sample monitoring well MW-9 quarterly as long as no sheen or measurable product is present in the well.

If you have any questions or require any additional information, please contact me at (505) 888-3952.

Sincerely,

Sara C. Brothers, CPG

Senior Project Manager - Remediation

Safety-Kleen Systems, Inc.

Enclosure

cc: Steven LuQuire, Safety-Kleen

Heather Collins, Safety-Kleen

Branch Environmental File (999)

Larry Seto, Alameda County Environmental Health Services

Loretta Barsamian, California Regional Water Quality Control Board

Greg Hoehn, SECOR International Incorporated

I:\SAFETY~1\OAKLAND\08\4Q99\OAKLAND8.L17 March 24, 2000 SECOR Job No. 007.50914



QUARTERLY PROGRESS REPORT
DECEMBER 1999 - FEBRUARY 2000
SAFETY-KLEEN SYSTEMS, INC. SERVICE CENTER
400 MARKET STREET
OAKLAND, CALIFORNIA
EPA ID NO. CAD053044053

SECOR Job No. 007.50914

3-28-00

Submitted By:

SECOR International Incorporated 1390 Willow Pass Road, Suite 360 Concord, CA 94520 925/ 686-9780

Prepared For:

Sara Brothers
Safety-Kleen Systems, Inc.
5219 Guadalupe Trail, NW
Albuquerque, New Mexico 87107
505/ 341-3866

March 28

Prepared by:

Nyree Melancon

Assistant Geologist

THOMAS W.

CROSBY NO. HG 257

CERTIFIED HYDROGEOLOGIST

5/31/01

Reviewed by:

Thomas W. Crosby C. Ha#

Thomas W. Crosby, C.Hg # 257 Principal Engineering Geologist

Greg D. Hoehn Principal Geologist

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#### 1.0 INTRODUCTION

This Quarterly Progress Report has been prepared in accordance with the Safety-Kleen Systems, Inc. (Safety-Kleen) Hazardous Waste Facility Permit's reporting requirements. This report presents the results of groundwater monitoring for the quarter of December through February 2000 at the Safety-Kleen Service Center located at 400 Market Street in Oakland, California (Figures 1 and 2).

Safety-Kleen received a comment letter from the Department of Toxic Substance Control (DTSC) dated January 24, 2000. The letter was prepared after review of Safety-Kleen's Corrective Measures report dated December 2, 1996. In the January 24, 2000 comment letter, the DTSC requested that Safety-Kleen prepare a Corrective Measures Work Plan. On February 22, 2000, Safety-Kleen submitted a letter to the DTSC requesting a 30 day extension for the work plan submittal. In a letter dated March 1, 2000, the DTSC approved the 30 day extension for the work plan to April 7, 2000. Copies of the correspondence are presented in Appendix A.

#### 2.0 PROJECT BACKGROUND INFORMATION

The Safety-Kleen Oakland Service Center is a local distribution center for Safety-Kleen products. Three single-walled underground storage tanks (USTs) were removed and replaced with two new 12,000-gallon double-walled tanks in June and July of 1990. Product and waste mineral spirits are currently stored in the two double-walled USTs at the site. One UST is used to consolidate waste mineral spirits prior to shipment to a Safety-Kleen Recycle Center and one UST is used for storage of product mineral spirits prior to distribution to Safety-Kleen customers.

During the single-walled tank removal, mineral spirits-impacted soil was excavated from the tank pit as allowable by site conditions. Additionally, a product recovery well and a vapor extraction system withdrawal network were installed in the tank pit area. Tank removal and excavation activities are documented in the Report of Underground Storage Tank Replacement Activities dated September 1990.

A product pumping system was installed in recovery well RW-1 to remove separate-phase product from the water table and began operation on January 19, 1993. The product pumping system was removed on November 20, 1995, and replaced with a passive hydrocarbon skimming device which is capable of removing product thickness within the well to a sheen. On August 5, 1998, the passive recovery skimmer was removed and oxygen releasing compound (ORC) was suspended in RW-1 in an effort to enhance site remediation by oxidizing residual impacts in the vicinity of the USTs. On October 5, 1999, the ORC was removed before an *in situ* chemical oxidation pilot study was implemented.

During the UST replacement program, underground piping was installed for use as a soil vapor extraction (SVE) network. The SVE system consists of seven horizontal vapor extraction perforated pipelines and a vapor extraction and treatment system. A system to extract and treat soil vapor utilizing regenerative polymer adsorption began full-scale operation on June 1, 1993. The SVE system was modified and restarted on November 28, 1995, utilizing a granular activated carbon (GAC) treatment system. Figure 3 depicts the layout of the vapor extraction pipelines and the vapor treatment system.

Data collected from initial start-up through October 19, 1999, indicate a total of approximately 5514 pounds of mineral spirits have been removed from the subsurface by the SVE system. After vapor sampling was completed on October 19, 1999, the SVE system operation was discontinued. The system will remain off throughout the duration of the chemical oxidation pilot study.

#### 2.1 Regulatory Status

The Safety-Kleen Oakland facility operates under a Hazardous Waste Facility Permit (Part B Permit; ID No. CAD0530 4053). A RCRA Facility Assessment (RFA) performed by the Department of Toxic Substances Control (DTSC) identified three solid waste management units (SWMUs) and one area of concern (AOC) at the facility. The results of the RFA were transmitted in the RFA Report dated June 1993. The Corrective Action Module of the Part B Permit (Section V) specified the need to submit a RCRA Facility Investigation (RFI) Work Plan to assess impacts related to the three SWMUs and the AOC. The RFI Work Plan was submitted on February 1, 1996. The DTSC approved the RFI Work Plan in correspondence dated February 23, 1996. The RFI Work Plan summarized site characterization work conducted at the site to February 1996 for the AOC and SWMUs identified in the RFA.

Subsequent to approval of the RFI Work Plan, an RFI Report was submitted to the DTSC on March 27, 1996, and was approved by that agency in correspondence dated May 20, 1996. The RFI Report states that the extent of total petroleum hydrocarbons as mineral spirits (TPHms) and volatile organic compound (VOC) impact at the facility is well defined and that the site characterization activities have adequately assessed the subsurface in the vicinity of the USTs and the return and fill shelter. The investigations have determined that soil impact is present immediately adjacent to the UST pit and has migrated along the capillary fringe as far as monitoring well MW-8 (see Figure 2).

In a letter dated September 20, 1996, the DTSC requested that Safety-Kleen prepare a Corrective Measures (CM) Report for the Oakland facility. Safety-Kleen submitted the CM Report on December 2, 1996. The purpose of the CM Report is to: (1) document the corrective measures which have been taken at the site to date, (2) evaluate the effectiveness of the corrective measures currently in use, and (3) provide an assessment of potential alternative methods. In a January 24, 2000 comment letter, the DTSC requested that Safety-Kleen prepare a Corrective Measures Work Plan (Appendix A). On February 22, 2000, Safety-Kleen submitted a letter to the DTSC requesting a 30 day extension for the work plan submittal (Appendix A). In a letter dated March 1, 2000, the DTSC approved the 30 day extension for the work plan to April 7, 2000 (Appendix A).

Safety-Kleen is following the modified groundwater sampling schedule as described in the letter submitted on October 8, 1998, and as modified and approved by Alameda County Environmental Health Services in a response letter dated November 17, 1998. With the exception that monitoring well MW-9 continue to be sampled quarterly if no sheen or product is present in the well, the modified groundwater sampling schedule is to sample six wells semi-annually, all wells annually, and continue to collect depth-to-groundwater data quarterly.

On March 8, 1999, an "In Situ Chemical Oxidation Pilot Study Work Plan (Work Plan)" was submitted to the California Regional Water Quality Control Board - San Francisco Bay Region (RWQCB) and to Alameda County. The injection of potassium permanganate (KMnO<sub>4</sub>) and subsequent monitoring was verbally approved by the RWQCB on September 30, 1999 and documented in a SECOR letter dated October 5, 1999. The *in situ* chemical oxidation pilot study was implemented on November 1, 1999, and is ongoing.

#### 3.0 SCOPE-OF-WORK

Groundwater monitoring conducted during this quarter consisted of measuring depth-to-water in 10 groundwater monitoring wells and 1 recovery well on February 23, 2000. The following sections provide a description of the activities conducted this reporting period.

#### 3.1 Groundwater Monitoring

On February 23, 2000, ten of the eleven monitoring wells and the one recovery well were monitored for depth-to-water. Well MW-12 was inaccessible due to a parked car over the well. All accessible monitoring wells were monitored for depth-to-water using a water-level indicator calibrated to 0.01-foot. The depth-to-water measurements were used with well survey data to prepare a groundwater potentiometric surface map (Figure 4). Field data sheets that include depth-to-water measurements are included in Appendix B. Prior to use and between each well, all non-single-use equipment was decontaminated by double-washing with a laboratory grade detergent in clean water and triple-rinsed using deionized water.

Groundwater elevations and depth-to-water measurements for the February 23, 2000, event are presented in Table 1. The average water-table elevation on February 23, 2000 was 3.26 feet above mean sea level (amsl), an increase of 1.55 feet since the October 1999 event. A groundwater potentiometric surface map prepared with this data is presented as Figure 4.

As shown in Figure 4, the on- and off-site groundwater flow direction remains to the south-southwest, consistent with historic site data. The hydraulic gradient was 0.0044 feet/foot (ft/ft) across the site as measured between monitoring wells MW-4 and MW-3. The hydraulic gradient is consistent with previous data for the site. A summary of groundwater elevations since January 1993 is provided as Table 2.

# 3.2 In-Situ Chemical Oxidation Pilot Study

The pilot study is being performed in accordance with the "In-Situ Chemical Oxidation Pilot Study Work Plan" dated March 8, 1999. On November 1, 1999, the in-situ chemical oxidation pilot study was implemented by injecting 440 pounds of KMnO<sub>4</sub> in solution (approximately 1000 gallons total) into recovery well RW-1. On January 12, 2000, 440 pounds of KMnO<sub>4</sub> in solution (approximately 900 gallons total) was injected into soil vapor collectors SV-1 and SV-5. Groundwater characteristics including oxidation reduction potential, dissolved oxygen, pH, and electrical conductivity will be monitored in the recovery well and nearby monitoring wells to evaluate the effectiveness of the pilot study.

On February 23, 2000, as part of the ongoing *in-situ* chemical oxidation pilot study, six of the groundwater monitoring wells were sampled for total petroleum hydrocarbons as mineral spirits (TPHms), volatile organic compounds (VOCs), manganese, and chloride. The initial results of the pilot study will be discussed in the Corrective Measures Work Plan and the pilot study data will be evaluated at the completion of the pilot study.

# 4.0 ACTIVITIES SCHEDULED FOR MARCH - MAY 2000

The following activities have been or are scheduled to be performed next quarter:

- Submit the Corrective Measures Work Plan to the DTSC on or before April 7, 2000.
- Perform semi-annual groundwater monitoring and sampling in April 2000.
- Prepare a quarterly progress report.

#### 5.0 CERTIFICATION STATEMENT

Quarterly Progress Report
Safety-Kleen Systems, Inc., Service Center
400 Market Street
Oakland, California
CAD 053044053

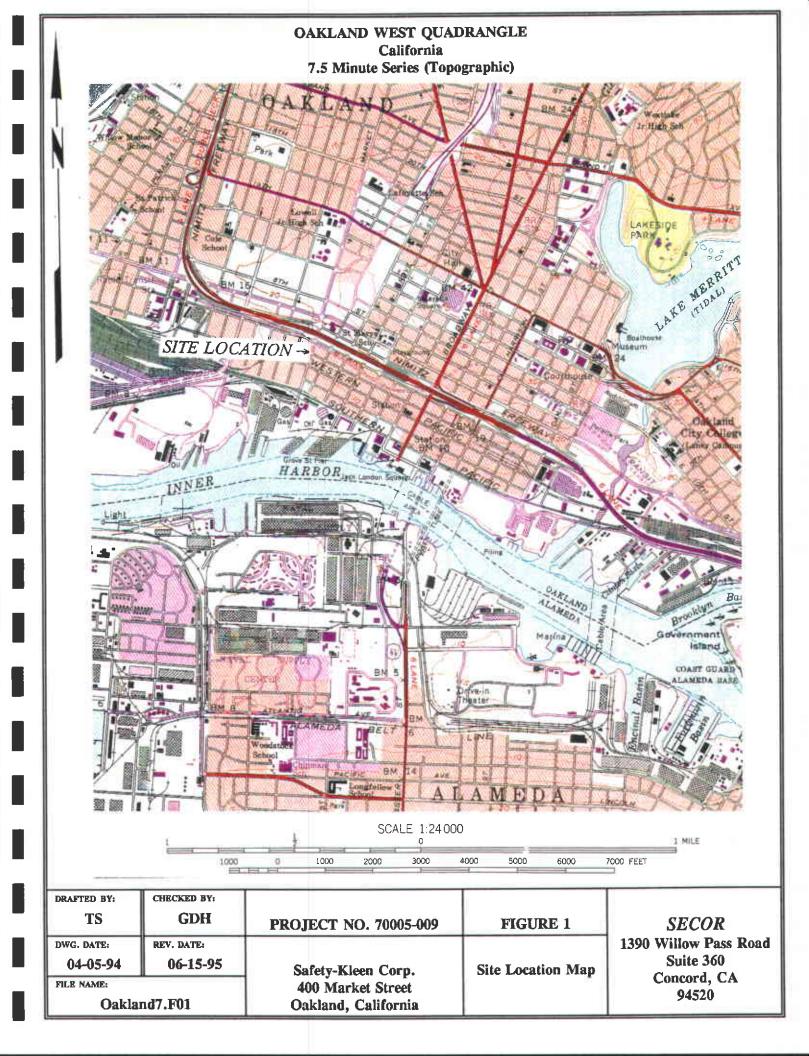
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

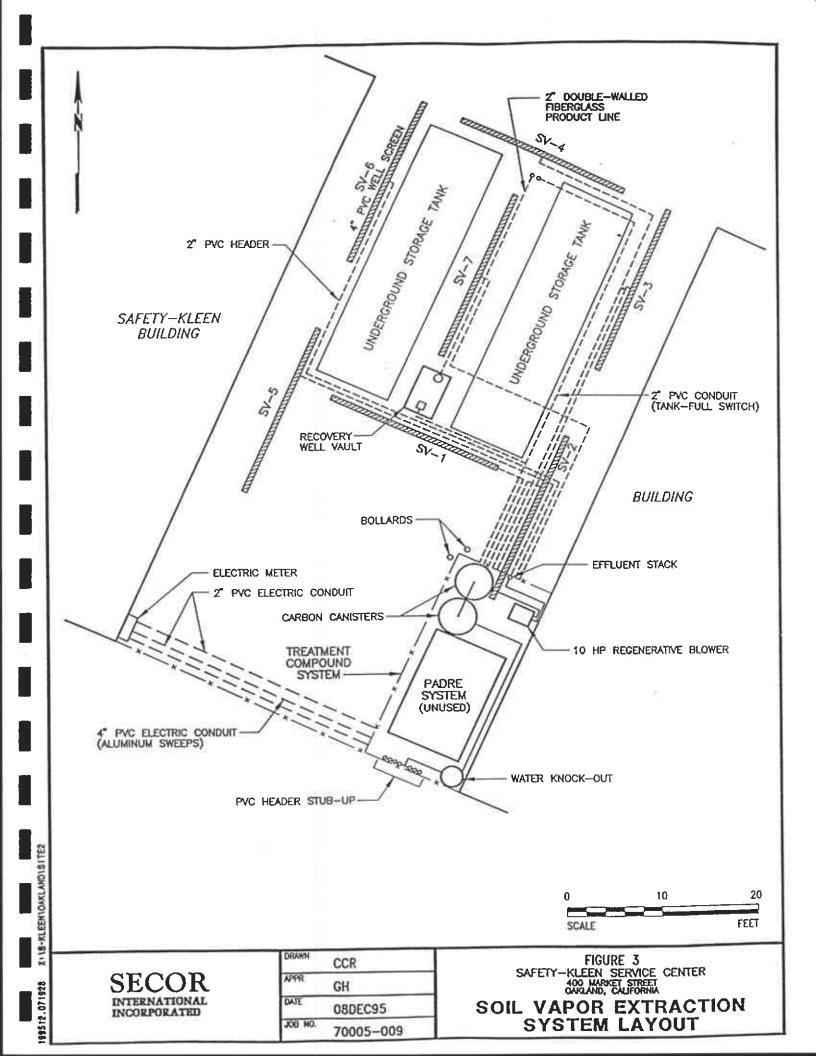
Sara C. Brothers, CPG

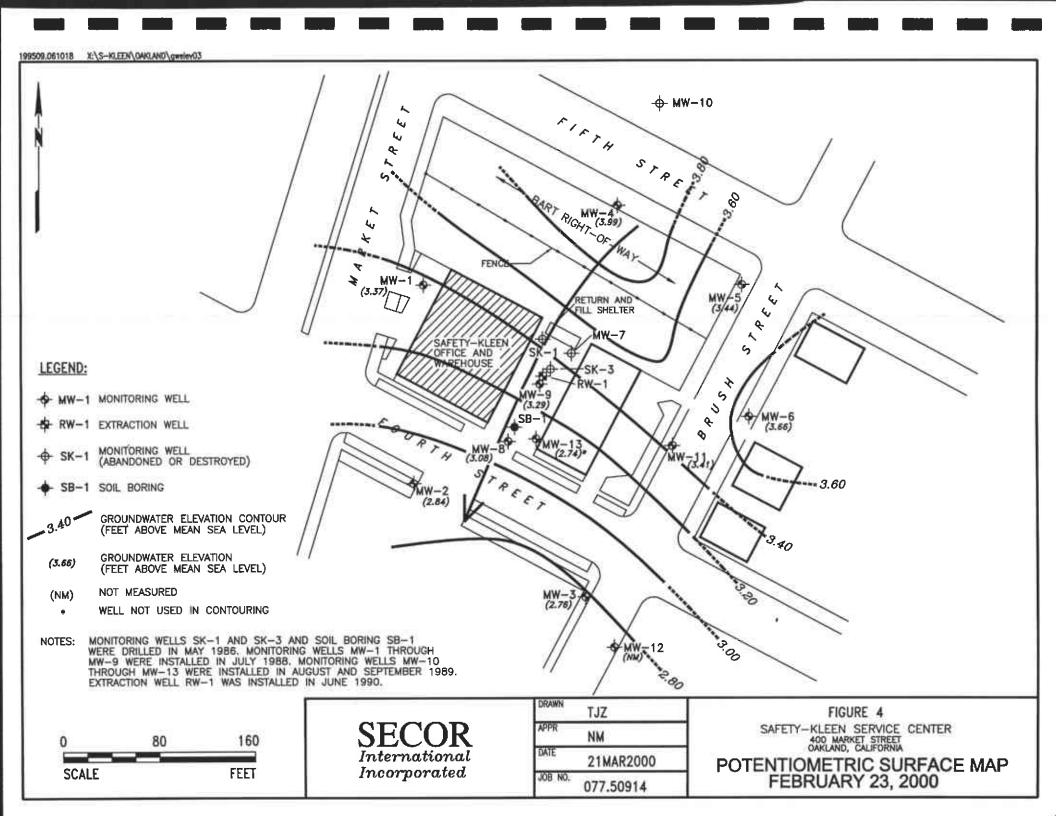
Safety-Kleen Systems, Inc.

Senior Project Manager - Remediation

3 27 00







### Table 1 Groundwater Monitoring Data February 23, 2000

### Safety-Kleen Systems, Inc. Service Center 400 Market Street Oakland, California

Well I.D.	TOC Elevation (ft msl)	DTW (ft)	DTP (ft)	PT (ft)	Adjusted Elevation (ft msl)
MW-1	7.99	4.62			3.37
MW-2	8.20	5.36		NOTE OF STREET	2.84
MW-3	6,66	3.90			2.76
MW-4	10.32	6.33			3.99
MW-5	10.28	6.84			3.44
MW-6	8.97	5.31			3.66
MW-7*		-	-		
MW-8	7.80	4.72			3.08
MW-9	8.21	4.92			3.29
MW-10**					
MW-11	7.91	4.50			3.41
MW-12	6.74				
MW-13	8.08	5.34		•	2.74
RW-I		4.20			

#### Notes

\* Well destroyed in May 1990.

\*\* Well destroyed in July 1995.

TOC = Top-of-casing
DTW = Depth-to-water
DTP = Depth-to-product
PT = Product thickness

ft msl = Feet relative to mean sea level

= Well covered by a car.

Table 2 Historical Summary of Groundwater Elevations (in feet relative to mean sea level)

#### Safety-Kleen Systems, Inc. Service Center 400 Market Street Oakland, California

Date				0.00.90.00.0	**********	Well Idea	ntification					
22000	MW-1	MW-2	MW-3	MW-4	MW-5	MW-6	MW-8	MW-9	MW-10	MW-11	MW-12	MW-13
01/20/93	1.29	1.00	0,86	1.57	1.48	1.27	1.08	1.15	1.73	1,16	0.44	0.58
04/20/93	1.09	0.51	0.38	1.52	1.42	1.08	0.74	0.95	1.85	0.90	0.10	0.40
07/20/93	0.27	-0.23	-0.27	0.68	0.62	0.37	-0.01	-0.68	0.99	0.20	-0.72	-0.15
10/20/93	-0.02	-0.51	-0.66	0.32	0.17	-0.12	-0.35	0.14	0.62	-0.22	-0.91	-0.57
01/19/94	-0.01	-0.52	-0.77	0.33	0.48	-0.10	-0.37	-0.49	0.60	-0.14	-1.05	-0.65
04/20/94	0.55	0.05	-0.09	0.85	0.74	0.46	0.22	0.33		0.34	-0.76	-0.09
07/19/94	0.25	-0.20	-0.31	0.62	0.55	0.23	-0.03	0.08	0.90	0.09	-0.70	-0.22
10/19/94	0.08	-0.33	-0.44	0.41	0.38	0.12	-0.15	0.01		0.01	-0.59	-0.33
01/04/95	1.95	1.53	1.64	2.41	2.49	2.24	1.79	1.85		2.06	1.44	1.33
04/10/95	3.09	2.46	2.49	3.71	3.73	3.42	2.79	2.95		3.18	2.22	1.98
07/11/95	2.04	1.53	1.53	2.54	2.50	2.26	1.76	1.93		2.01	1,33	1.53
10/12/95	1.38	0.94	1.01	1.81	1.27	1.56	1.15	1.32		1.42	0.94	1.06
01/09/96	1.82	1.40	0.64	2.21	2.21	2.04	1.61	1.54		1.85		1.51
04/02/96	2.81	2.40	2.46	3.33	3,36	3.17	2.58	2.51		2.91	2.24	2.38
07/01/96	2.16	1.70	1.75	2.67	2.63	2.35	1.90	1.93		2.18		1.84
11/01/96	1.09	0.70	0.75	1.47	1.47	1.18	0.90	0.86				0.78

SECOR Job No. 70005-009-08 1q00/Table 2

Page 1 of 2 3/28/00

# Table 2 Historical Summary of Groundwater Elevations (in feet relative to mean sea level)

#### Safety-Kleen Systems, Inc. Service Center 400 Market Street Oakland, California

Date						Well Idea	dentification					Contractor (
Same.	MW-1	MW-2	MW-3	MW-4	MW-5	MW-6	MW-8	MW-9	MW-10	MW-11	MW-12	MW-13
01/17/97	2.89	2.39	2.58	3.48	3,52	3.34	2.70	2.57			.*	2.50
04/10/97	2.43	1.89	1.99	2.92	2.86	2.53	2.18	2.19		2.45	1.71	1.99
07/17/97	1.70	1.19	1.25	2.15	2.12	1.86	1.44	1.29	-	-	1.12	1.35
10/08/97	1.40	0.94	0.97	1.79	1.76	1.51	1.16	1.35	-	-	0.84	1.06
01/12/98	3.02	2.99	3.12	3.45	3.49	3.34	2.89	2.63		3.15	2.50	2.48
04/13/98	3.92	3,20	3.43	4.77	4.50	4.17	3.63	3.91		3.91	3.08	3.37
07/21/98	2.79	2.15	2.13	3.37	3.37	3.05	2.50	2.71		2.85	2.21	2.35
10/12/98	2.28	1.68	1.79	2.97	2.90	2.55	2.04	1.47		2.33	1.72	1.93
01/22/99	2.30	1,78	2.06	2.81	2,82	2.51	2,10	1.88		2.41	1.71	1.76
04/14/99	3.15	2.49	2.78	3.75	3.75	3.49	2.86	3.01		3.24	2.33	2.59
07/06/99	2.21	1.64	1.76	2.72	2.72	2.40	1.94	1.41		2.24	1.71	1.81
10/08/99	1.81	1.27	1.35	2.35	2.26	1.98	1.57	1.75		1.80	1.21	1.44
02/23/00	3.37	2.84	2.76	3.99	3.44	3.66	3.08	3.29		3.41		2.74

#### Notes:

Groundwater elevations are in feet relative to mean sea-level datum.

<sup>- =</sup> Not measured

<sup>-- =</sup> Not measured because the well was covered.

APPENDIX A
CORRESPONDENCE



# Department of Toxic Substances Control

Gray Davis Governor

inston H. Hickox Secretary for Environmental Obtection January 24, 2000 Edwin F. Lowry, Director 5796 Corporate Avenue Cypress, California 90630

Ms. Sara Brothers
Senior Project Manager - Remediation
Safety-Kleen Corp.
2720 Girard Boulevard, NE
Albuquerque, New Mexico 87107

CORRECTIVE MEASURES REPORT: SAFETY-KLEEN CORP. SERVICE CENTER, 400 MARKET STREET, OAKLAND, CALIFORNIA (EPA ID NO. CAD053044053)

Dear Ms. Brothers:

The Department of Toxic Substances Control (DTSC) has completed our review of the corrective measures report, dated December 2, 1996, for the Safety-Kleen Corporation, Oakland facility. Based on our review, we find that the report is inadequate in scope and in content. DTSC must satisfy the requirement to complete a proper evaluation of the remedial alternative and selection process in order for us to certify that Safety-Kleen, Oakland has completed the necessary corrective action as prescribed under the California Health and Safety Code and the Resources Conservation and Recovery Action (RCRA) for corrective action.

Currently, DTSC is requiring that all Corrective Measure Studies to be conducted in accordance with Chapter 7 of DTSC's Draft Corrective Action Orientation Manual, dated June 1994. A copy of Chapter 7 is enclosed for your information.

DTSC requests, by this letter, that Safety-Kleen, Oakland completes a Corrective Measure Workplan in accordance with our guidance and submit it to DTSC within 30 days of receipt of this letter. The new project manager for the Safety-Kleen, Oakland, facility - Mr. Aaron Yue, is open to meeting with you to discuss the scope of this project if necessary.

ent By: ;

Feb-7-00 3:29PM;

Page 2/2

Ms. Sara Brothers January 24, 2000 Page 2

If you have any questions regarding this matter, you may contact Mr. Yue at (714) 484-5439.

Sincerely,

Robert M. Senga

**Unit Chief** 

Geology and Corrective Action Branch

Enclosure



February 22, 2000

Mr. Robert Senga California Environmental Protection Agency Department of Toxic Substances Control Southern California Branch 5796 Corporate Avenue Cypress, California 90630

Corrective Measures Work Plan Extension RE: Safety-Kleen Systems, Inc. Facility 400 Market Street, Oakland, California EPA ID No. CAD 053044053

Dear Mr. Senga:

Safety-Kleen Systems, Inc. (Safety-Kleen) has prepared this letter in response to the January 24, 2000, letter from the Department of Toxic Substances Control (DTSC) regarding the 1996 Corrective Measures Report for the Safety-Kleen facility located at 400 Market Street in Oakland, California. Safety-Kleen received the letter on February 7, 2000. Safety-Kleen agrees to comply with the DTSC request to prepare a Corrective Measures Work Plan (the Work Plan). However, Safety-Kleen requests a 30-day extension for the Work Plan submittal. As you are aware, Safety-Kleen initiated a groundwter remediation pilot study at the site in 1999, as part of the ongoing voluntary interim measures being conducted at the facility. Initial groundwater monitoring results will be available in March 2000. The initial results of the pilot study will guide the course of future corrective actions at the site. Therefore, Safety-Kleen requests that the Corrective Action Work Plan be submitted to the DTSC no later than April 7, 2000.

If you have any questions or require additional information, please contact Greg Hoehn with SECOR at (925) 686-9780 or myself at (505) 341-3866.

Phone 505/341-3866

Sincerely,

Sara C. Brothers, CPG Senior Project Manager Safety-Kleen Systems, Inc.

Aaron Yue, DTSC Cc:

Steven LuQuire, Safety-Kleen Heather Collins, Safety-Kleen

Greg Hoehn, SECOR

I:\Safety-Kleen\Oakland\CMWP Letter Response.doc February 22, 2000

**&** 

Ms. Sara Brothers March 1, 2000 Page 2

cc: Mr. Greg Hoehn SECOR 1390 Willow Pass Road, Suite 360 Concord, California 94520-5250



# Department of Toxic Substances Control

Edwin F. Lowry, Director 5796 Corporate Avenue Cypress, California 90630

Gray Davis Governor

Winston H. Hickox Secretary for Environmental Protection

March 1, 2000

Ms. Sara Brothers Safety-Kleen Corp. 2720 Girard Boulevard, NE Albuquerque, New Mexico 87107

Senior Project Manager - Remediation

EXTENSION APPROVAL FOR THE SUBMITTAL OF A CORRECTIVE MEASURES WORKPLAN: SAFETY-KLEEN CORP. SERVICE CENTER, 400 MARKET STREET, OAKLAND, CALIFORNIA (EPA ID NO. CAD053044053)

Dear Ms. Brothers:

The Department of Toxic Substances Control (DTSC) is in receipt of your letter requesting an extension for the submittal of a corrective measure workplan for the Safety-Kleen Corporation, Oakland facility. By this letter, DTSC grants the extension for the submittal of the workplan until April 7, 2000, so that the initial groundwater monitoring results can be utilized and incorporated into the corrective action at the facility.

If you have any questions regarding this matter, you may contact Mr. Aaron Yue at (714) 484-5439.

Sincerely,

Robert M.

**Unit Chief** 

Geology and Corrective Action Branch

California Environmental Protection Agency Printed on Recycled Paper



APPENDIX B FIELD DATA SHEETS

# HYDROLOGIC DATA SHEET

SAFETY-KLEEN SYSTEMS, INC 400 MARKET STREET OAKLAND, CALIFORNIA

PROJECT NO.: 007.

DATE:

END TIME: 14:00

V	VELL ID	Well Diameter (inches)	Top Of Casing Elevation (ft msl)	Depth To Water (feet)	Depth To Product (feet)	Product Thickness (feet)	Total Depth (feet)	Adjusted Groundwater Elevation (ft msl)
*	MW-1	2	7.99	4.62				
X	MW-2	2	8.20	5.36				
	MW-3	2	6,66	3.40				
	MW-4	2	10.32	6.33				
	MW-5	2	10.28	684	<u> </u>			
	MW-6	2	8.97	5.31_		-		
*	MW-8	2	7.80	4.72				
Ŕ	MW-9	4	8.21	4.42		_		<u> </u>
	MW-11	2	7.91	4.50				
_	MW-12	2	6.74	CAL over				
₩.	MW-13	4	8.08	5.34				
X	RW-1	10	-	4.20			<u> </u>	<u> </u>

Notes:

Dup- On 9 8615, 8260, Mang. Chlor.

Equp. Blank 8015, 8260

Sample wells 8015, 8260 Mang. Chlor.