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#### FINAL CLOSURE REPORT of the CHROMEX PLATING FACILITY

5/17/94

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# FINAL CLOSURE REPORT OF THE CHROMEX PLATING FACILITY

Prepared for CHARLES LOWE COMPANY 1400 PARK AVENUE EMERYVILLE, CALIFORNIA 94608-0445

For submittal to
ALAMEDA COUNTY HEALTH AGENCY
DIVISION OF HAZARDOUS MATERIALS
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**NOVEMBER 1, 1992** 

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# FINAL CLOSURE REPORT OF THE CHROMEX PLATING FACILITY

1400 PARK AVENUE EMERYVILLE, CALIFORNIA 94608-0445 (510) 652-5900

#### 1 INTRODUCTION

The Chromex plating facility was a hard chrome plating shop located at 1400 Park Avenue, Emeryville, California. An area, vicinity, and site map of the Chromex facility are located in Appendix A. In January 1991 Chromex ceased all chrome plating operations and contracted Excel Trans. Inc. to perform a complete plant closure and facility decommissioning.

Excel Trans prepared and submitted to the Alameda County Health Agency (ACHA) on April 5, 1991 the "Technical Proposal and Workplan for Chromex" (hereafter called workplan) for the closure. Documented in the May 22, 1991 ACHA amendment, ACHA gave verbal approval of the workplan, and Excel Trans began closure activities on April 22, 1991. On April 17, 1992, Excel Trans submitted to ACHA a second amendment which outlined additional work at the site. The additional work commenced on June 19, 1992 and included demolition of the structure and vault. All closure activities at the site have been performed according to the ACHA approved workplan and amendments, and are documented in this report.

#### 2 PROJECT OVERVIEW

The Chromex closure was a complete facility decommissioning and closure. Closure included the following activities:

- removal and disposal of tank contents
- removal and decontamination of equipment
- removal and/or decontamination of structural surfaces
- removal of concrete vault
- sampling of decontaminated equipment and surfaces for residue levels

The removal and disposal of tank contents was performed according to all applicable local, state, and federal regulations. Tank contents were transferred to D.O.T. containers, loaded onto registered hazardous waste haulers, and disposed at an EPA permitted treatment facility. After disposal of tank contents, workers commenced decontaminating equipment.

Equipment was washed with high pressure water, field tested for contaminant residue levels, and sorted for proper disposal. Disposition of decontaminated equipment included both nonhazardous and hazardous disposal.

During equipment cleaning, workers began decontaminating the concrete vault, steel structure, and building surfaces. However, cleaning the structure did not bring contaminant residue levels below the specified target limits. As a result, Excel Trans submitted an amendment to ACHA on April 17, 1992 which outlined the necessary steps to demolish the building structure and concrete vault. ACHA approved the amendment, and demolition of the vault began on April 29, 1992.

At present, all Chromex equipment, piping, structural supports, siding, and roofing have been transported from the site and disposed of according to all applicable local, state, and federal regulations. Only two structural surfaces remain at the site: the southern brick wall and 2/3 of the grade-level concrete floor. Analysis of samples of the washed brick wall confirm that the wall was decontaminated to acceptable residue levels (Appendix G). Further, results of a subsurface soil investigation performed in October 1992 will be used to assess the status of the grade-level concrete flooring.

The following sections of this report present details and documentation of closure activities at the site.

#### 3 OVERVIEW OF SAMPLING, TESTING, AND DISPOSITION OF WASTE

Throughout the decontamination and dismantling process, waste was categorized as hazardous or nonhazardous and was accumulated and handled accordingly. Categorizing waste was accomplished by testing residue levels of representative samples to confirm that approved cleaning levels had been achieved.

Testing of samples included both field testing at the site and analyses at a California DHS certified laboratory. Field testing was limited to test strips for pH, chromium, and oxidizer characteristic. Certified chemical laboratory analysis of grab, rinse, and composite samples were tested for metals and pH using EPA test methods.

Testing of residue levels was used as a tool to categorize decontaminated equipment as either hazardous or nonhazardous waste. Both field and analytical tests results were used to classify waste. Residual levels for pH, chrome, and oxidizer characteristic and the corresponding waste category are outlined in Table I.

TABLE I
CRITERIA FOR CLASSIFICATION

TEST RESULTS		CLASSIFICATION
chrome: pH: oxidizer:	< 2ppm 5 - 10 negative	Target residue levels for cleaned structural surfaces. Acceptable to leave at the site.
chrome: ph; oxidizer:	< 5 ppm 5 - 10 negative	Nonhazardous waste for cleaned structural surfaces.
chrome:	≥ 5ppm	Hazardous waste for structural surfaces.

Once waste was classified, it was handled and disposed of according to all applicable local, state, and federal regulations. For example, structural surfaces that met the acceptable residue level of <2ppm chrome were left at the site. In addition, waste that was classified as nonhazardous was disposed of at Class III landfill, wood recycling, or metal reclamation facility. Waste that was classified as hazardous waste was sent to EPA permitted disposal facilities.

Moreover, the disposition of hazardous waste defined as organic and inorganic debris was disposed of at Envirosafe Services of Idaho under the EPA national capacity variance for Third Third debris (55 FR 22556, June 1, 1990 and 55 FR 22650, June 1, 1991).

Documentation of hazardous and nonhazardous waste disposal is located in Appendix C and D respectively. Documentation of the disposal of waste includes the following:

- manifests
- metal reclamation receipts
- wood recycling receipts
- scavenger receipts

A list of disposal facilities and their descriptions is outlined in Table II, page 4.

TABLE II

HAZARDOUS & NONHAZARDOUS DISPOSAL FACILITIES

DISPOSAL FACILITY	FACILITY DESCRIPTION
Norris Environmental Services 5215 So. Boyle Avenue	EPA permitted treatment facility for liquids
Los Angeles, CA 90058	EPA ID Number CAD097030993
US Ecology	EPA permitted Class I landfill
Highway 95 Beatty, NV 29003	EPA ID Number NVT330010000
Envirosafe Services of Idaho 10.5 miles Northwest of Grandview Missile Base Road	EPA permitted Class I landfill
Grandview, ID 83624	EPA ID Number IDD073114654
Aptus 11600 North Aptus Road	EPA permitted incinerator
Aragonite, UT 04029	EPA ID Number UTD981552177
Forward Landfill	California Permitted Class III landfill
9999 So. Austin Road Stockton, CA 95215	CAL EPA ID Number CAD990794133
Sharon Metal San Jose, CA	Scrap recycler for metal reclamation
Oakland Scavenger / Davis Street Transfer Station / Altamont Landfill 2000 Embarcadero, #101 Oakland, CA 94606	Local Class III landfill
Major Salvage Company 3237 Fernside Boulevard Alameda, CA 94501	Wood recyclers

#### SITE PREPARATION

Prior to the commencement of all work at the Chromex facility, the site was prepared for environmental remediation activities. Site preparation included training employees in project safety procedures, securing the site, and building a contamination reduction zone (CRZ) and temporary berm.

Employee training included hazardous waste worker training and site specific safety training. Excel Trans' employees received 40-hour OSHA training for hazardous waste workers (29 CFR 1910.120) and one hour of safety instructions specific to health and safety concerns at the Chromex facility. Site specific training included instruction in chemical and physical hazards, personal protective equipment, respirator training, hazard mitigation, and general safe work practices. In addition, the Site Safety Officer instructed employees on the routes to the nearest medical clinic and hospital.

After the site safety meeting was given, and before closure work activities began, Excel Trans' employees secured the Chromex site with a chain-link temporary fence. Installation of the fence restricted site access and served as a security measure for on-site storage of remediation equipment.

After the site was secured, an electrician locked-out the power supply, and Excel Trans workers constructed the CRZ and temporary berm. The CRZ was a temporary structure with separate personal protective equipment, shower/decontamination, and clean locker rooms. Site personnel were required to enter and exit through the CRZ.

The temporary berm was constructed simultaneously with the construction of the CRZ. The temporary leak proof berm enclosed the entire inside perimeter of the plating shop. The purpose of the berm was to collect and contain excess rinsate from decontamination of the equipment, piping, and surfaces.

Once the site was prepared for work activities, the workers mobilized equipment and began work activities as described in the workplan and amendments.

#### 5 REMOVAL AND DISPOSAL OF TANK CONTENTS

Prior to closure, the Chromex facility contained eight aboveground tanks which contained plating, etching, and stripping solutions. Table III lists the volume, construction material, and contents of all eight tanks.

TABLE III

VOLUME, CONSTRUCTION MATERIAL, & CONTENTS OF TANKS

VOLUME (Gallons)	CONSTRUCTION MATERIAL	CONTENTS
3600 Gallons	Steel	Chrome Plating Solution
3200	Steel	Chrome Plating Solution
3200	Steel	Chrome Plating Solution
2800	Steel	Chrome Plating Solution
750	Polyethylene	20% Sodium Hydroxide
120	Polyethylene	20% Hydrochloric Acid
100	Polyethylene	20% Sulfuric Acid
60	Polyethylene	20% Hydrochloric Acid

TABLE IV

MANIFESTS AND SHIPPING DATES FOR TRANSPORT OF TANK CONTENTS

AND RINSATE

SHIPPING DATE	MANIFEST No.	DESCRIPTION	QUANTITY (GALLONS)
April 1, 1991	89887237	Rinsate	3,800
April 5, 1991	89887229	Chrome plating solution	4,200
April 8, 1991	89924867	Chrome plating solution	4,000
April 24, 1991	89924866	Chrome plating solution	1,000
May 29, 1991	90328817	Stripping solution	880
June 9, 1991	90328916	Chrome plating solution	330
July 12, 1991	90328987	Rinsate	4000
May 5, 1992	91716485	Rinsate	550

Beginning in April 1991, all plating, etching, and stripping solutions were pumped from the above listed tanks into vacuum trucks and were transported to Norris Environmental Services. In addition to the tank contents, rinsate contaminated with chromium which was generated during decontamination of equipment was also sent to Norris for disposal. Prior to transport, all containers were packaged, labeled, and handled according to all applicable local, state, and federal regulations. In addition, all loads were shipped on a California hazardous waste manifest as required by federal and state regulations. A registered hazardous waste hauler, Excel Trans, transported the tank contents to Norris. Table IV lists the manifests and shipping dates for shipment of tank contents and rinsate to Norris. Copies of all manifests are located in Appendix C.

# 6 REMOVAL AND DECONTAMINATION OF PROCESS AND RELATED EQUIPMENT

Process and related equipment at the site was removed and decontaminated prior to disposal. Equipment at the site consisted of the following:

- process and electrical piping
- fume scrubber

- rectifiers, boilers, heat exchanger, overhead crane
- polyethylene tanks
- steel tanks with rubber liners

Disposal methods for decontaminated equipment included metal reclamation, Class III landfill, and Class I landfill. Except for the rectifiers, equipment was not remarketed.

Metal piping and other metal equipment that was amenable to decontamination was cut into sections and cleaned with a high pressure steam washer. As discussed in Section 5, all wash water from metal decontamination was collected and stored on site for disposal at Norris Environmental Services. Final rinse water from decontamination was field tested for pH, chromium, and oxidizer characteristic. After field tests were performed on the final rinse water, decontaminated metallic items that met acceptable residue levels (Table I, page 3) were sent to metal reclamation for disposal. Typically, copper piping was cleaned to less than 5 ppm (Appendix E) by pressure washing, and was sent to metal reclamation. Items that were decontaminated but exceeded 5 ppm chrome (e.g.: the fume scrubber and heat exchanger) were placed in a bin for disposal at Envirosafe Services of Idaho. Nonmetallic equipment, such as polyethylene tanks and rubber tank liners, were placed directly in bins for transportation and disposal at Envirosafe Services of Idaho. Manifests documenting hazardous waste disposal are located in Appendix C.

# DECONTAMINATION AND REMOVAL OF STRUCTURAL SURFACES

The plating room was a steel frame structure with wood siding and roofing. The north, east, and west sides of the structure were wood. The south side of the structure was a brick and glass

wall. In order to preserve the structure for later use, attempts were made to decontaminate structural surfaces in-place. Except for the southern brick wall, decontamination proved ineffective.

A pilot study for in-place decontamination confirmed that washing wood surfaces would be ineffective in reducing the chrome concentration to acceptable residue levels. For example, analysis (EPA method 1311 and 6010) of unwashed and washed wood from a pilot study showed a chrome concentration of 1,740 ppm and 121 ppm respectively (Appendix F). Thus, the siding was disposed of as hazardous waste at Envirosafe Services of Idaho.

Roofing material was removed from the structure and representative samples were field tested for residue levels (Appendix E). Roofing was found to meet acceptable residue levels and was categorized as nonhazardous. Roofing material was placed in bins for disposal to a Class III landfill and wood recycling facility. Documentation for disposal of roofing material by Oakland Scavenger is located in Appendix D.

The steel I-beams, crane, cross beams, and channel iron were removed to complete the demolition of the structure. Once removed, steel and iron pieces were decontaminated with high pressure water and sorted for disposal. Steel and iron that was below 5ppm chrome was sent to Sharon Metals for metal reclamation. Metal that field tested at 5ppm chrome or higher (Appendix E) was placed in the hazardous waste bin for disposal at Envirosafe Services of Idaho.

The southern brick and glass wall which adjoined the Charles Lowe manufacturing area was successfully decontaminated with high pressure water and was left in place. All rinsate was collected on site and disposed of according to regulations. Certificates of analysis documenting that the wall was cleaned to less than 2 ppm chrome are located in Appendix G.

#### 8 INSPECTION OF FLOORS AND VAULT FOR CRACKS

After equipment was removed, the concrete floor and vault were inspected for cracks. The inspection revealed shallow surface cracks in the grade level and vault floors. Subsequently, surficial soil samples were taken at grade level. Complete results of the analysis, borehole locations, and chain-of-custody have been submitted to ACHA in the "Workplan for Initial Subsurface Investigation", July 24, 1992.

As a result of the surficial soil sampling and analysis, a subsurface investigation was completed in November of 1992 (see "Workplan for Initial Subsurface Investigation" submitted to ACHA on July 24, 1992). A final report documenting the results of the subsurface soil investigation was prepared for Charles Lowe for submittal to ACHA on November 4, 1992.

#### 9 REMOVAL OF CONCRETE SURFACES AND THE CONCRETE VAULT

The closure workplan submitted to ACHA specified decontamination of the concrete floor and vault. However, attempts to decontaminate the concrete surfaces proved ineffective. Excel Trans submitted an amendment to remove the vault and concrete surfaces.

Concrete surfaces were not amenable to chemical cleaning. For example, analysis performed after chemical cleaning showed a chrome concentration of 7,200 mg/kg in a concrete vault wall sample (Appendix H). This analysis confirmed that chemical washing was inappropriate, and the original workplan was amended and submitted to ACHA on April 17, 1992.

After approval of the amendment by ACHA, Tank Excavators, Inc. was subcontracted to shore and excavate the vault. Tank Excavators applied for and received City of Emeryville excavation permit number B4301-492 on April 14, 1992. Prior to demolition, Tank Excavator shored the vault with sheetpile. During shoring, approximately 40 yd³ of soil was excavated. The soil pile was tested for California 17 metals and Volatile Organics by approved EPA methods at a DHS certified laboratory. Analysis of the soil, which was submitted to ACHA in the subsurface investigation workplan, indicated that the soil was neither a state or federally regulated waste. At present, soil has been accepted and assigned approval number 92-245 at Forward Landfill, a Class III landfill. A bill of lading documenting disposal will be submitted to ACHA as soon as the soil is transported to Forward.

After shoring was completed, the entire concrete vault was excavated and sent to Envirosafe Services of Idaho for disposal. In addition to the excavation of the vault, a portion of the concrete floor surrounding the vault was also excavated and sent to Class I landfill. Manifests documenting disposal are located in Appendix C.

#### 10 PRESENT STATE AND FUTURE USE OF SITE

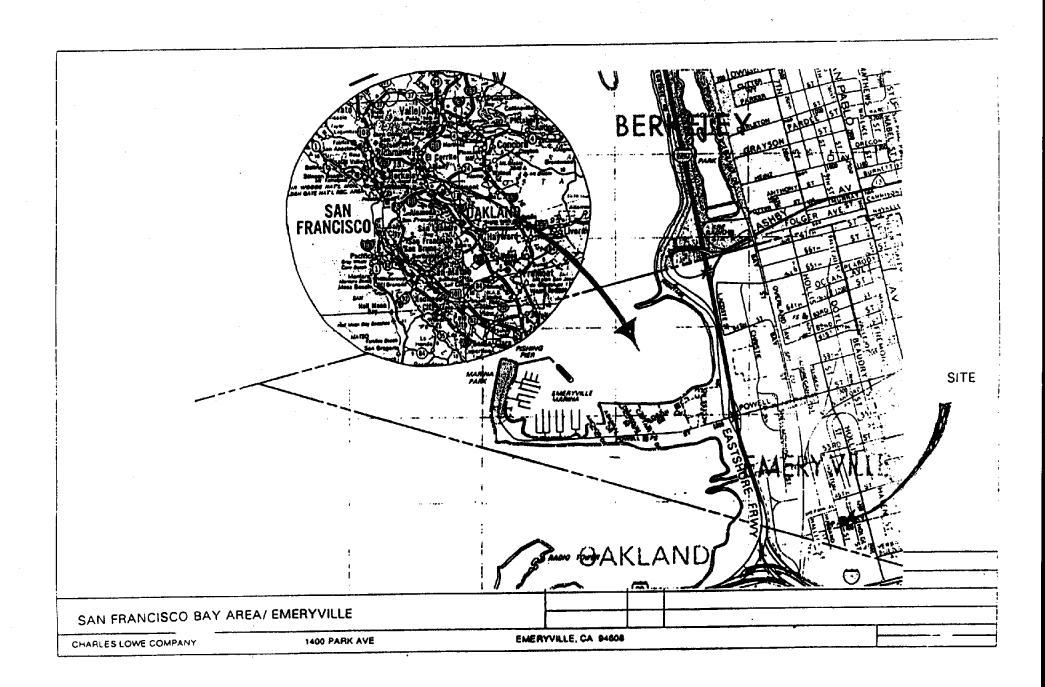
At the present time, the entire building structure has been demolished and approximately 30% of the concrete floor has been removed to expose native soil. In addition, a 10 ft deep excavation exists in the location of the former vault. The vault and soil were sampled in October 1992.

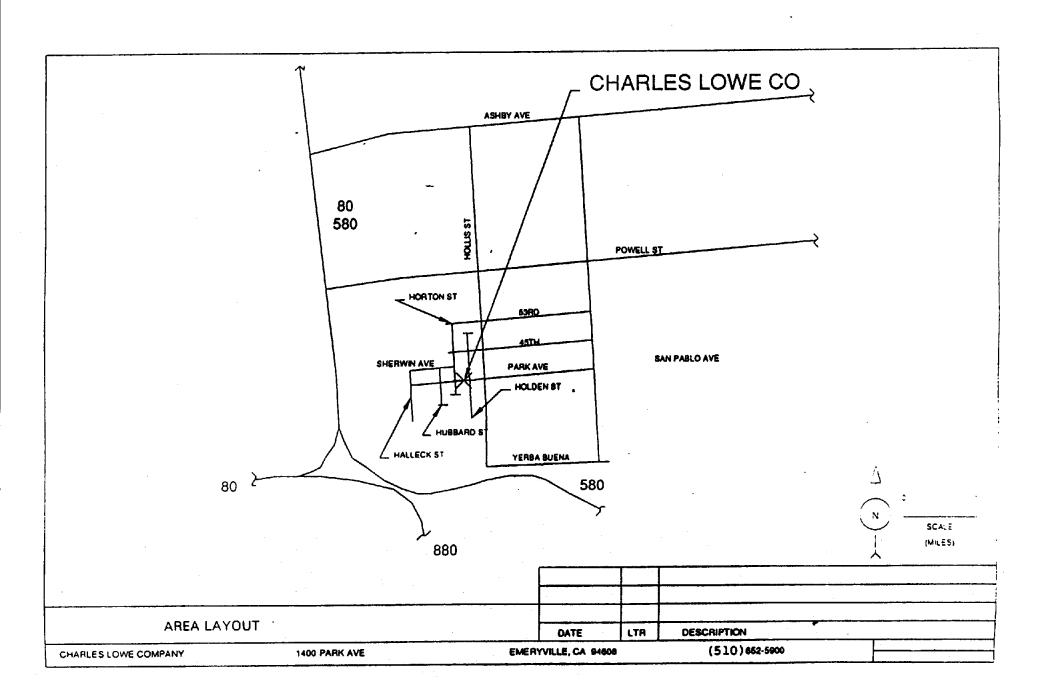
A preliminary subsurface investigation of the vault, soil, and groundwater was undertaken at the site on October 1, 1992. A summary of the findings were submitted to ACHA on November 4, 1992. As part of the summary, Excel Trans recommended that the soil in the vault be immediately excavated below the water, and that the excavated hole be refilled with gravel after analysis shows that soil chrome concentrations have dropped below a level of regulatory concern. ACHA has given verbal approval to the recommendations. Work will begin as soon as possible.

Once the pit has been filled, Charles Lowe intends to use the former Chromex site as an outdoor uncovered storage area for large equipment.

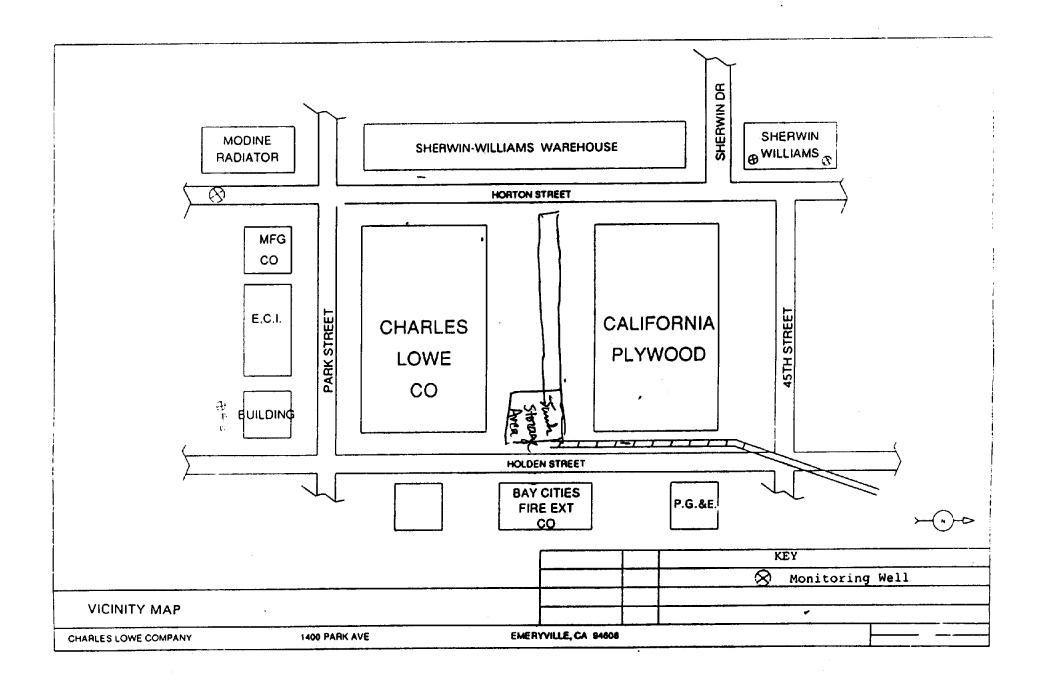
# APPENDIX A

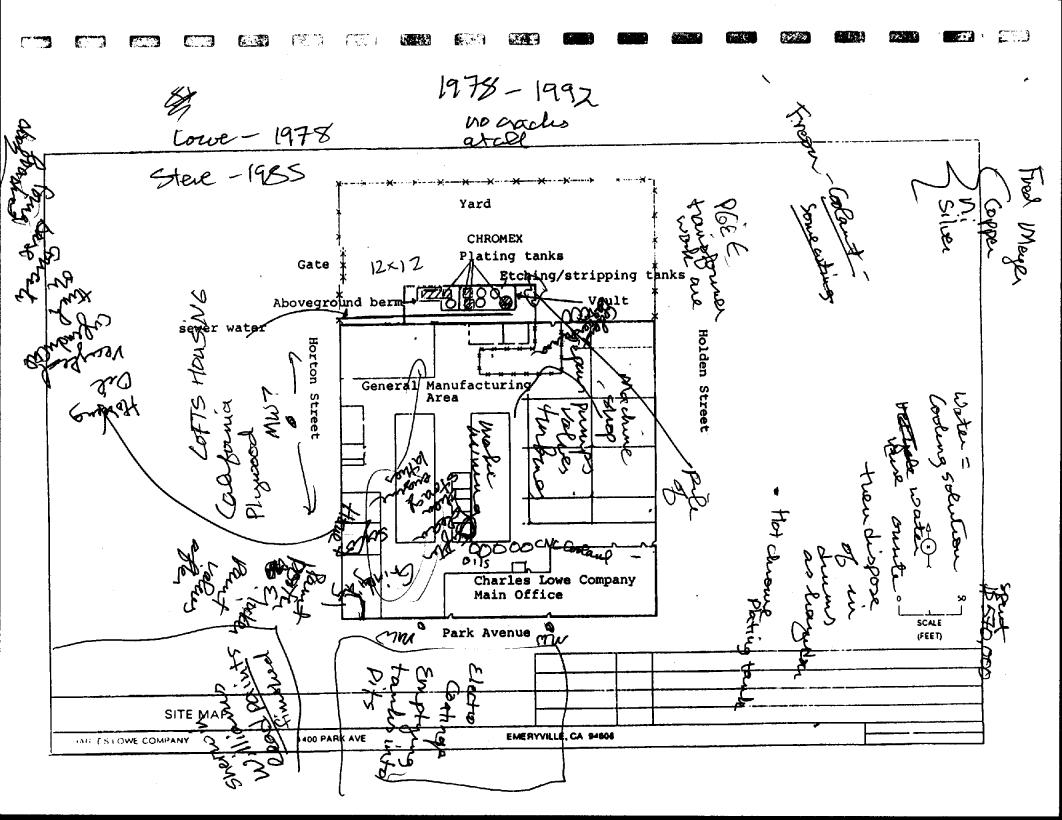
Area, Vicinity, and Site Maps





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ALAMEDA COUNTY HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director

MAY 22, 1991

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DEPARTMENT OF ENVIRONMENTAL HEALTH Hazardous Materials Program 80 Swan Way, Rm. 200 Celdend, CA 94621 (416)

Mr. Fred Schappert Charles Love Company 1400 Park Avenue Emeryville, CA 94608

Workplan For Chromez, Closure of Flating Facility RE: 1400 Park Avenue, Emeryville, Ch \$4608

Dear Mr. Schappert:

The Alameda County Department of Environmental Health, Hazardous Materials Division has received and reviewed the workplan for the closure of the plating facility at the referenced site, as submitted by Excel Trans under cover letter dated April 5, 1991. Through telephone conversation with Mr. David Mielsen of Excel Trans, the closure plan was given a verbal approval and is acceptable subject to the following conditions:

- \* All other rederal, state or local statutes, regulations, ordinances, requirements or limitations which are applicable to your project must be followed.
- \* The Health and Safety Plan consistent with applicable requirements of 29 CFR 1910.120 must be followed and a complete copy must be available at the site during the closure operation.
- \* The on-site storage of any hazardous waste generated by the decontamination activities must not exceed 90 days.
- \* Disposal of waste generated in the closure operation must be supported by analysis by a state certified lab.
- \* Field tests are acceptable as a screening tool but laboratory analysis by a state certified lab are required for verification of the extent of decontamination.
- \* A time schedule for the entire closure activities must be submitted to this department.
- \* A written notification for any changes or deviation in the closure workplan must be submitted and approved by this department.

Mr. Fred Schappert May 22, 1991 Page 2 of 2

- \* Encapsulation of contaminated structures using a physical barrier such as plaster, epoxy resine, or paint is not acceptable.
- \* A final report of the results of the decontamination and closure process, including all the data from all measurements, the results of all analytical procedures and copies of manifest for disposal must be submitted to this office within one month after the conclusion of closure activities.
- \* After the closure operation has been completed, a final inspection by this department will be conducted.
- Investigation for soil and/or groundwater contamination must be executed before final closure can be recommended.

Issuance of a final closure for the facility will depend on the extent to which the clean-up work done meets the requirements of this letter.

If you have any questions regarding this letter, please contact me at (415) 271-4220.

sincerely.

Susan L. Hugo

Susan L. Hugo Hazardous Materials Specialist

co: Rafat A. Shehid, Asst. Agency Director, Environmental Health Gil Jensen, District Attorney, Alameda County Consumer and Environmental Protection Agency

Lester Feldman, San Francisco Bay MWQCB Howard Hatayana, State Department of Health Services David Hielsen, Swoel Trans Files

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# APPENDIX C

Manifests

# SUMMARY OF MANIFESTS DOCUMENTING DISPOSAL

DATE SHIPPED	DISPOSAL FACILITY	MANIFEST NUMBER	DATE RECEIVED
04/01/91	Norris Environmental	89887237	04/03/91
04/05/91	Norris Environmental	89887229	04/06/91
04/08/91	Norris Environmental	89924867	04/09/91
04/24/91	Norris Environmental	89924866	04/25/91
05/29/91	Norris Environemental	90328817	05/30/91
06/20/91	Norris Environmental	90328916	06/24/91
06/26/91	Envirosafe Services of Idaho	90328909	06/27/91
07/09/91	Envirosafe Services of Idaho	90328931	07/10/91
07/12/91	Norris Environmental Services	90328987	07/13/91
07/29/91	US Ecology	89887200	08/01/91
08/27/91	Envirosafe Services of Idaho	90329052	08/28/91
03/18/92/	Aptus, Inc.	91717669	03/24/92
03/26/92	Norris Environmental Services	91718071	03/26/92
03/31/92	Envirosafe Services of Idaho	91718022	04/02/92
04/29/92	Envirosafe Services of Idaho	91718026	04/30/92
05/01/92	Norris Environmental Services	91716488	05/05/92
05/04/92	Envirosafe Services of Idaho	91718094	05/05/92
05/05/92	Envirosafe Services of Idaho	91718029	05/06/92
05/05/92	Envirosafe Services of Idaho	91718092	05/07/92
05/05/92	Envirosafe Services of Idaho	91718030	05/06/92
05/07/92	Envirosafe Services of Idaho	91716474	05/07/92
05/06/92	Envirosafe Services of Idaho	91718086	05/07/92
05/06/92	Envirosafe Services of Idaho	91716475	05/07/92
05/06/92	Envirosafe Services of Idaho	91718089	05/07/92
05/06/92	Envirosafe Services of Idaho	91718090	05/07/92
05/05/92	Envirosafe Services of Idaho	91716473	05/07/92

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9. Designated Facility Name and Site Address 10.	US EPA ID Number			e Facility's IO		
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Los Angeles, CA 10058 CAP	व हाण हा मेल	12. Cont		13. Total	14.	l.
11. US DOT Description (Including Proper Shipping Name, Hezard Class, a		No.	Туре	Quantity	Unit Wt/Vol	
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<b>d.</b>						EPA/Other
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15. Special Handling Instructions and Additional Information	cts in proper condition  Lee to reduce the volut  Sie method of treatmen  f I am a small quantity	me and toxic t, storage, o generator, i	accuratel by high	iste generated to t	d.	per shipping name le international ar ee I have determi which minimizes ninimize my waste
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Department of Health Services

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19

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D.C.S., OF M-E, MATHER  A. Additional Descriptions for Materiale Listed Above DEUM PLC RX-3+  WAS DEUBHHFE A, PLE ENCLOSE A 3LBS SACH  EN PERMIT # 2-1251  WEVERLY COME OF SEED 128 MM1-2-78	Criptions for Materials Listed Above  DRUM FLC RX - 3 + K. Handling Codes for Wastes List  EPA/S  State  Criptions for Materials Listed Above  DRUM FLC RX - 3 + K. Handling Codes for Wastes List  EPA/S  State  Ling Instructions and Additional Information  UNION R R CRYSTERCATION: I heraby declare that the contents of this consignment are fully and accurately described above by proper shipp instited, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable interms ermment regulations.  R S CERTIFICATION: I heraby declare that the contents of this consignment are fully and accurately described above by proper shipp instited, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable interms ermment regulations.  R S CERTIFICATION: I heraby declare that the contents of this consignment are fully and accurately described above by proper shipp institude, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable interms ermment regulations.  R S CERTIFICATION: I heraby declare that the contents of this consignment are fully and accurately described above by proper shipp institude, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable interms ermment regulations.  R S CERTIFICATION: I heraby declare that the contents of this consignment are fully and accurately described above by proper shipp institute.	1	1. US DOT Description (Including Proper	Shipping Name, He	szard Class, and	ID Number)		No.	Туре	Quar	ility		
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Department of Health Sen-Toxic Substances Control Prog Sociamento, Cattle

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	WASTE MANIFEST  3. Generator's Name and Malling Address	<u>ខ្លាត់ ខេត្ត</u>	<u> </u>	1 15 14 1	A State	of 3 Manifest Document	Number	
	Conumex	4:	<b>.</b>	te <b>v</b> e		Senerator's ID	• <b>•</b>	<u> </u>
	4 Generalors Prome (\$10) 532-590	ville, GA 94	nos contacti <sup>S</sup>	Lade	Ħ	A # 1 21 31 6	4 O1 11	2:6:1:7
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	7, Transporter 2 Company Name	7.3	EPAID Number			orter's Phone		
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	11. US DOT Description (including Proper Shipping	Name, Hazard Class, and it	D Number)	No.	Type	13. Total Quantity	14. Unit W/Vol	L Waste Manager
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ال	15. Special Handling Instructions and Additional Billing Excel Trans	Asometica	ar gloyes	ogqles wh	an ha	ndling mat	erial	
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	Benicia, CA	14510 Box	rris profil	e no.: 2	1803C	R3		1
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1 L	WASTE MANIFEST PLAIDIGE	811151713121213	18 10 1	9 14		
3	i, Generator's Name and Mailing Address			A. Stone	or 1 Monifest Documen	Number Q 4 77
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1 L	510 852=5900 PROTEST	IGA CONTERCE! SERVE	Slade	73	A 4 b 4 k	
5	i. Transporter I Company Name	6. US EPA ID Number		C 37 Cife	Transporters ID	STATE
▍├	Transporter 2 Company Name	8. US EPA ID Number	2663		posters Phone / y	(L) (1/4 (S) 4/5)
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9	Designated Facility Name and Site Address	10. US EPA ID Number			orters Phone Footbys D	
	nvirosafe Services of Idaho, Inc Ob miles NW of Grandview	74			11111	Luci
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Gi	randy lew IDaho 83624 US DOI Description (including Proper Supping Name, Hazard C	lass, and ID Number	12 Conto	rea	15. Total	14. Unit
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	i. Special Handing Instructions and Additional Information					
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WASTE MANIFEST C A D 9 6 1 5 7 3 2 2 3 Monifest Document No. 1,6,4,7,5 WASTE MANIFEST 3. Generator's Name and Mailing Addres
CD YORKS. B. Stote Generators D 1400 Park Avenue, Emeryville CA 94608 N. A. B. (2) 3 (8) (2) 12 (8) (8) 4 Generators Phone 510 ) 552-5900 Emergency contact: Steve Slade ADDE 3547 5. Transporter 1 Company Name D. Brancoskopinose (Co. A LIS EPA ID Number 7. Transporter 2 Company Name A MANUAL CONTRACTOR 10. US EPA ID Number O Desproted Facilty Name and Sie Address
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10-, mileshw of Grandview I,D,D,O,7,3,1,1,4,6,5,4 Missile Base Road 83624 13. Total GERACOLOW, (LEASURE AND A AMERICA GOVERN HOME, HOSAID Class, and ID Number) Wt/Val Quantity 3 "RO" Hazardous Waste Solid, M.O.S., ORM-H (Chrome contaminated debris) 00.1 NA9189 N E R A MITIN Ò R CENTER.1-800-424-8802: ₫ Actes (Control Control Control (Control Control Control (Absort) - 7/300 year diases on constets Special Handling Instructions and Adaltional Information Wear gloves/goggles when handling RESPONSE ESII PCM No.: 12247-001 16. GENERATOR'S CERTIFICATION: I hereby decisive that the contents of this consignment are fully and accurately described above by proper shipping name and are classified NATIONAL packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; CR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford. Printed/Typed Name 0,510,614i6 17. Transporter 1 Acknowledgement of Receipt of Materials hinted/Typed Name ろんけんじ O Month Signature Printed/Typed Nor ö CASE 19. Discrepancy indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

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packed, maked, and labeled, and are in all respects in propi if i gm a large quantity generator, i certify that I have a pre- economically practicable and that I have selected the prac- titude to human health and the environment; OR, if I am a sm	er condition for incretont by highway regram in place to reduce the volu- ficable method of teatment, storag roll quantity generator, I have made	raccording to o me and toxicity e, or disposal o	applicable y of wash usersily o	international and ( ), generated to the validate to me which	xational govi degree 1 ha n minimises 1	emment regulati we determined t he present and t
ted/lyped Name	Sprake	1,		<del>-</del>	Month	Day
Steve A Slade	Stast	ade			015	5101619
ntect/Typed Name	Signature			<del></del>	Month	Day
DAN ROSE	Dan Por	م	· · · · · · · · · · · · · · · · · · ·		0.5	10/61
Transporter 2 Actinowledgement of Receipt of Materials inted/typed Name	Signature	. <u>-</u>			Month	Day
						1 , 1
Discrepancy Indication Space				· ·		
		except as note	d in Item	19.	Mon#	) Day
Donna Puller		-Pc	LLL	in		507
	Special Handling Instructions and Additional Information  Weer gloves / gaggles with a  ESSE PEN No.: 12247-04  GENERATOR'S CERTIFICATION: I hereby decising that the compacted, marked, and labeled, and are in all respects in property of a large quantity generator, I certify that I have a preconstructly practicable and that I have selected the practitive to human health and the environment: QR. II am a simulation to human health and the environment: QR. II am a simulation not investigated that I can investigated Name  Steve A Sig &  Transporter 1 Acknowledgement of Receipt of Materials inted/Typed Name  DAN ROSE  Transporter 2 Acknowledgement of Receipt of Materials inted/Typed Name  Discrepancy indication space	Special Honding Instructions and Additional Information  Weer gloves/goggles select Levelling  ESIE P(N No.: 12247-001  SENERATORS CERTIFICATION: I hereby decising tool the contents of this consignment are fully a goodled, marked, and tabeled, and are in all respecting proper condition for increaping by highway if I gan a large quantity generator, I certify that I have a program in placy to reduce the volus economically practicable and that I have selected the practicable method of readment, storage thread to human health and the environment OR. If I am a small quantity generator, I have made management method that is available to me and that I can affect to the management method that is available to me and that I can affect the management method that is available to me and that I can affect the practicable method.  Structure  Structure  Structure  Structure  Structure  Structure  Structure  Structure  Discrepancy indication space  I receipt of Materials  Structure  Discrepancy Indication space  Space Indication Spac	SPECIAL PCN No.: 12247-001  SENERATORS CREATERATION: I have by decise that the contents of this consignment are fully and accurately packed, making and indeeds, and are in all respects in proper condition for increasing to the packed making and indeeds, and are in all respects in proper condition for increasing the highway according to the second making packed, and that I have related the program in pilotop to reduce the volume and indefine construction in the contents of the contents. I storage or disposal of threat to human health and the environment: OR. If I am a small quantity generator, I have made a good faith element method that is available to me and that I can affect to a small quantity generator. I have made a good faith element method that is available to me and that I can affect.  Strake  Strake  Strake  DAN ROSS  Transporter 1 Acknowledgement of Receipt of Materials  Transporter 2 Acknowledgement of Receipt of Materials  Transporter 2 Acknowledgement of Receipt of Materials  Transporter 2 Acknowledgement of Receipt of Materials  Transporter 3 Acknowledgement of Receipt of Materials  Transporter 4 Acknowledgement of Receipt of Materials  Transporter 5 Acknowledgement of Receipt of Materials  Transporter 6 Acknowledgement of Receipt of Materials  Transporter 7 Acknowledgement of Receipt of Materials  Transporter 8 Acknowledgement of Receipt of Materials  Transporter 9 Acknowledgement of Receipt of Materials  Transporter 9 Acknowledgement of Receipt of Materials  Transporter 9 Acknowledgement of Receipt of Material	Special forceting instructions and Additional Information  Weer gloves goggles when Levelling  ESSE PCN No.: 12247-001  SettleBATORS CERTIFICATION: I havely disclare fitted the constants of this constants are fully and accountly described packing maked, and are in all empecials in proper concilion for learning the volume and toxicity of waste economically protectable and that I have an program in place to reduce the volume and toxicity of waste economically protectable and that I have selected the production method of textiment, alongo, or disposal currently on the economically protectable and that I have selected the production method of textiment, alongo, or disposal currently on the economically protected, if have made a good fath effort to mis management method that is available to me and that I can asked upon the management method that is available to me and that I can asked.  Stransporter I Actinovivedgement of Receipt of Materials  Transporter I Actinovivedgement of Receipt of Materials  Transporter I Actinovivedgement of Receipt of Materials  Transporter I Actinovivedgement of Receipt of Materials  Signature  Dan Ross E  Transporter I Actinovivedgement of Receipt of Materials  Signature  Donna Pull L  Donna Pull L  Donna Pull L	Special Handing Instructions and Additional Information Weer gloves / gagges seeken Leading  ESSIE PCN No.: 12247-001  September 1 September 1 Instruction and inspecial to the contents of this configuration are fully and accounted described above by proper species, maked, and intellege, and are in all impects in proper condition for transport by highway accounting to applicable international and in a large quantity generated, a certify that I have a program in places to reduce the volume and lookably of works, generated to the economicably productable and that I have excellented the productable international and instruction and intellectual method of transporter intellectual method that is now excellented the productable to the what economical intellectual method in the investment. OR, II can a small quantity generated, I have made a good faith effort to minimum my wrate gen management method that is now excellented to the condition.  Structure  Structure  Structure  DAN ROSE  Transporter 7 Actinovitedgement of Receipt of Materials  Transporter 7 Actinovitedgem	Special Handing instructions and Additional Information  Weer gloves / goggles with a leasting  ESSE PCN No: 12247-001  September 2 to your service of the contents of this consignment are fully and accurately described above by proper shipping nan packed, marked, and labeled, and are in all supperty in proper gondlion for leasing by highway according to applicable international and international and increase in the service of the service in the service of the contents of the service in the service of the service in the servic

	Steve A. Slade	At aslado	0,510,617,2
Ŧ	17. Transporter 1 Acknowledgement of Receipt of Materials		
R	Printed/Typed Name	Signature	Month Day Year
N S P	- RANDAIL BEATKY	Randall Bently	0151016112
Ō.	16. Transporter 2 Acknowledgement of Receipt of Malertals Printed/Typed Name	Sgnatue	Month Day Year
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Ē			11111
$\overline{}$	19 Disconcer Indication Space		

19. Decrepancy indication space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

Month Day Year

DO NOT WRITE BELOW THIS LINE.

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T

112 661 1 Department of Health Service State of California—Health and Welfare Agency See Instructions on back of page 6. Toxic Substances Control Progra Form Abproved OMB No. 2050--0039 (Expires 9-30-91) Please print or type. Form designed for use on eithe (12-pitch lypewriter). Sacramento, Cattlat 1. Generator's US EPA ID No. information in the shaded areas Monifest Document No. 2. Page 1 UNIFORM HAZARDOUS of ] is not required by Federal tow.  $C_1 X_1 C_1 9_1 G_1 1_1 5_1 7_1 3_1 2_1 2_1 3_1 1_1 6_1 4_1 7_1 3_1$ **WASTE MANIFEST** A. State Manifest Document Number Q 3. Generator's Name and Mailing Address 1400 Fark Avenue, Charyville CA 34600 B. State Generator's D 4 Generalors Phone (510 ) 652-3900 Engargency congenut: Steve Slade H ( & B) () () (6) () (1/2/6/1) C. State Transporter's ID 💰 🛴 🐧 🐧 6. US EPA ID Number 5. Transporter 1 Company Name ANGEN982663 EXCEL TEAN D. Ironsporter's Phone //) / -- // 8. US EPA ID Number E. State Transporter's ID 7. Transporter 2 Company Name F. Iransporter's Phone 9. Designated Facility Name and She Address Envirogate Services of Idaho, Inc 105 miles aw of Grandview 10. US EPA ID Number G. State Facility's D . . . . . 1-800-652-H. Footly's Phone (208) 384-1506 Alesile Base Road 37317CV1.0W, 1.1d1.0 33C.24

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) 14. Uni 13. Total 12 Contoines Quantity Wt/Val Туре N V "Rt" Hazardous Waste Solid, H.O.S., ORCHE G RA9189 (Chrome contaminated debris) E T 0 PAJOR K. Handing Codes for Warter Listed Above. Ackillional Descriptions for Materials Listers Above 4) 9 - 7200 ppm chrows on concrete & wood CENTER 15. Special Hondling Instructions and Additional Information, wear groves/gogyles when Randling RESPONSE TAVE A SEACE 415255-8433 ESII PCR Ho.: 12247-301 16. GENERATOR'S CERTIFICATION: I hereby deciare that the contents of this consignment are fully and accurately described above by proper shipping name and are absolited, NATIONAL packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and inational government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; QR, If I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste 置 management method that is available to me and that I can afford. CALL DOV Printed/Typed Name F- 1 - 1 - 1 - 1 - 1 - 1 マランテン 17. Transporter 1 Acknowledgement of Receipt of Material õ Signature Printed/Typed Name ANSP EMERGENCY 10% 1 1 11 18. Transporter 2 Acknowledgement of Receipt of Malerials O Signature Ř Printed/Typed Name E ö 19. Discrepancy Indication Space A C 20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. ı DOV Printed/Typed Name T 2116 F

DO NOT WRITE BELOW THIS LINE.

## APPENDIX D

Non-hazardous Disposal Receipts

JAKLAND SCAVENGER CONTAINER DIV A WASTE MANAGEMENT COMPANY 7,77 OAKPORT ST #350 OKLAND, CA. 94621

ACCOUNT NUMBER 70-0 351545 70-0 5/01592

THE CHARLES LOWE CO P O BOX 8445 EMERYVILLE, CA 94608

**51 OF** 

PAGE

**10)430-8194** 

SERVICE AT: 1400 PARK AV EMERYVILLE, CA 94608

BILL NUMBER	DATE	DESCRIPTION	AMOUNT
25)		REMINDER-PAST DUE	
		PREVIOUS BALANCE	868.95
	4/13/92	PAYMENT-THANK YOU	289.65C
	4/13/92	PAYMENT-THANK YOU	289.65C
1454359	5/01/92	APR 1992	275.75
1454359	5/01/92	LOCAL AND STATE MANDATED FEES	13.90
1707000	0, 01, 02		

PAYMENT COPY
INVOICE RECEIVED

MAY 1 4 1992

Approved 5551-Date 85-14-90

P.O. No. 1

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TOTAL DUE

*579.30* 

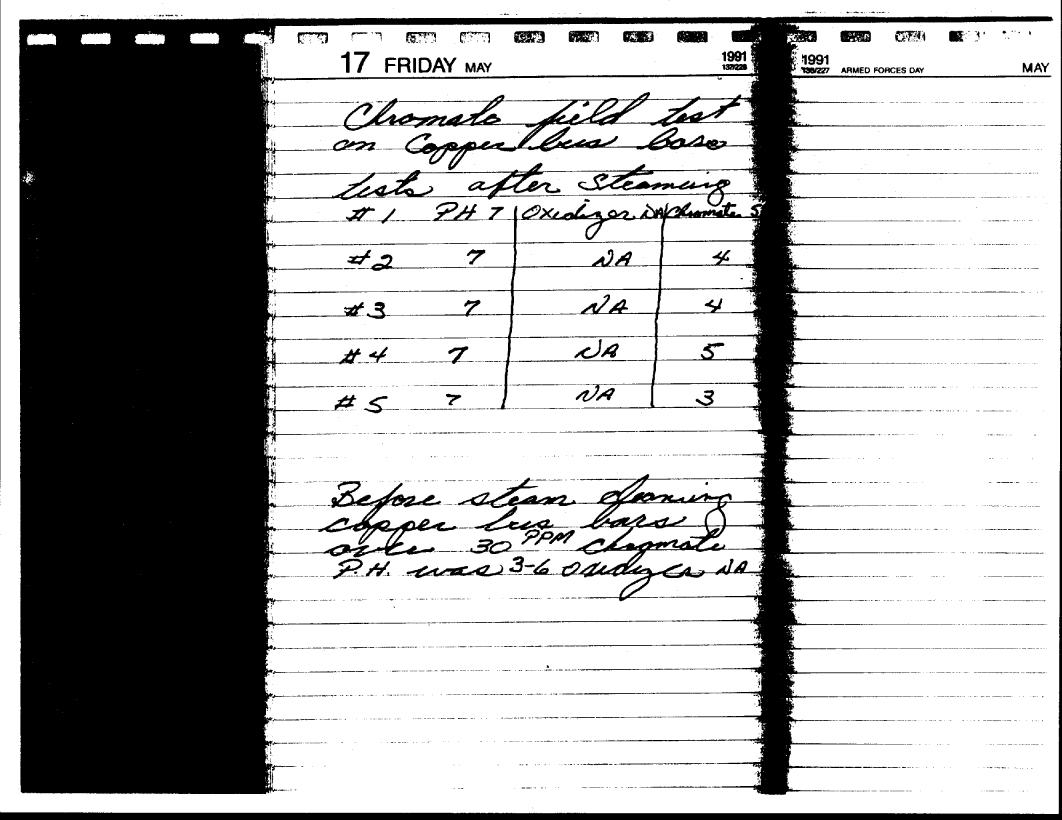
JUST A FRIENDLY REMINDER THAT AS OF 04/24/92, WE HAD NOT RECEIVED YOUR PAYMENT IF YOU HAVE ALREADY MAILED YOUR PAYMENT, KINDLY DISREGARD THIS MESSAGE. WE WILL NOT BE HELD RESPONSIBLE FOR ARTICLES PLACED IN OR NEAR THE RECEPTACLES.

AMOUNT

	DELIVERY	RECEIPT		
DATE /5/1	977	KECEIFI	NO.	0577
FROM MC	Jor Salvage 1	0.		3
TO Cho	cles Lowe co.		YOUR ORDER	3
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## APPENDIX E

Field Test Results



JUNE WEDNESDAY 19 18 TUESDAY JUNE PRESSURE WASHED TANK SECTIONS Thesoure aboled Sanks section field tests 'AMPLE, (FIGLD, TESTS) #1 Chomate 379M Gangles # 1 Chronate 579M Assiger Ma Molyer ds. # 2 chonates Oppm #2 Chamte 379M oridager NA oudyse NA + 3 chromate 5 PPM #3 Chant 33pm Oriologes NA Openlage, DA +4 Chanata 57pm #4 Chante 3ppm Madyer NA Odishor NA 15 Chandle 39pm Drager ais sampling in breaking of Greenburge wanting of land sesting ong. olielger ils Drager ais compling in crea of Cements removed from Bit 0.1 mg.

23 THURSDAY MAY 3 ppm Oxidges PH 7

JUNE TUESDAY 25 24 MONDAY JUNE Drager air sample Scrap melal loaded into grenue washing Chromate field tests tank stands #1 chromate trace oxidge NA 112 chromate there orideger NA #3 Chomal 3PPM oustigen da chomate 599M Onedeger In. Droger air sample from comment removal area 0.1 mg

10 MONDAY JUNE 100+ PPM GOT PPM PH 7 oxidaes 947 dielyer 747 Opidages Not

28 TER ERT 1992 200136	210/155 MARCH 3 TUF 1992
28 FEB. ERI 1992 200138	LODDED ROOF DECKING
LOODED FOOT DECKING	INTO CLASS 3 BIN/WITH
INTO CLASS 3 8 in	ROOFIND PAPER & GRADEL
AROUND 35 SHEETS	AROUND 40 SHEETS
	CHROMATE FIELD TESTS
CHROMATE FIELD TESTS	ILI CHROMATE O
	OXIDIZER NA
#1 CHAMATE O	PH 7
OXIDIZER NA	+ 2 0 1 0
PH 7	#2 CAROMATE 3
	OXIDIZER NA
#2 CHROMATE O	P# 8
OKIDIZER NA	#3 CHROMATE 3
. <del>PH</del> 7	OXIDIZER DA
	P# 7
43 CHROMATE 3 PPM	
OX DA	#4 CHROMOTE O
P#	OKIDIZER NA
that aller matter a	I PH 7
#4 CHROMATE O	
9H $7$	#5 CHROMATEO
	OXIDIZER NA
#5 CHROMATE O	PH 7
OX NA	
24	#6 CHROMATEO
	OXIDIZER DA
#6 CHROMATE O	+ PA
OX NA PH 7	
PH 7	
	<b>■</b>

JULY WEDNESDAY 31 1991 MARCH 4 WED 1992 LODDED ROOF DECKING INTO CLASS 3 Bin with BORNE PAPERY GRADEL AROUND 40 SHEETS OF DECKING CHEOMATE FIELD TEST IT I CHROMATE 3, OXIDIZER #2 CHROMATE 3 OXIDIZER NA #3 CHROMATE O OXIDIZER NA #4 CHEOMATE 3. OXIDIZER NA #5 CHROMATE OXIDIZER NA #4 CHROMATE OXIDIZER PH #7 CHROMATE OXIDITER NA PH. #8 CHROMATE 3 OXIDIZER NA

# APPENDIX F

Analysis of Wood Siding



#### **ERICKSON**

3033 Richmond Parkway, Suite 300, Richmond, CA 94806 (415) 262-1500 + FAX (415) 758-8643

#### **ERICKSON Analytical**

## Certificate of Analysis

Toxicity Characteristic Leaching Procedure Chromium EPA Method # 6010

Erickson W.O. : 80500

Matrix : Wood/ Debris

Date Sampled : 05/21/91

Project Number: N/A Date Prepared : 05/21/91

Date Analyzed : Date Reported : 05/22/91 05/24/91

Instrument I.D.: TCP1

Reporting Sample

EPA MEthod# ( mg/L)

Limit ID # ( mg/L) Siding

Chromium (Cr) 6010 1.00

Element

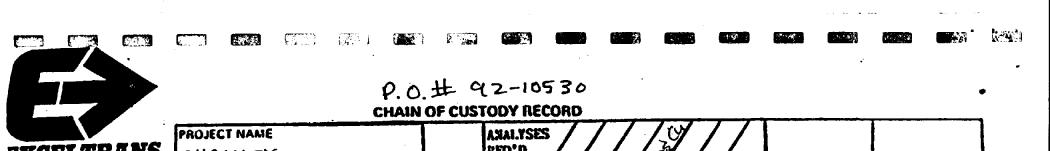
Sample and Blank Extracted by EPA Method 1311 (TCLP).

Analyst

Sarg Dhillon

## APPENDIX G

Analysis of Brick Wall and Windows



0 n H 92-10530

								O. JE CUS										•
EXC	181	TRA	NS	6	PROJECT NAME				AMAI	'D				/	3//			
aface to the										R	Sel.							
MUE	DATE	TIKE	8	GRAB	SAMP	E I.	OCATION	HEDIA		3/	Ž		<u>Y</u>	$\angle$	DETECTION LIMIT .	<b></b>	-AROUND TIME	SUSPECTED CONTAMINANT
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ह्य			M		GLASS	K	LINSE		<u>  ~   </u>	X						<u> </u>	<u> </u>	
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September 24, 1992

Ms. Mary Boyd Excel Trans, Inc. P.O. Box 866 Benicia, California 94510-0866

Dear Ms. Boyd:

Trace Analysis Laboratory received one solid sample and two water samples on September 10, 1992 for your project, Chromex (our custody log number 2475).

These samples were analyzed according to your chain of custody. Our analytical report and the completed chain of custody form are enclosed for your review.

Trace Analysis Laboratory is certified under the California Environmental Laboratory Accreditation Program. Our certification number is 1199.

If you should have any questions or require additional information, please call me.

Sincerely yours.

Jernifer Rekol Project Specialist

**Enclosures** 

...

LOG NUMBER:

2475 09/10/92

DATE SAMPLED: DATE RECEIVED:

09/10/92

DATE EXTRACTED:

09/15/92 and 09/17/92

DATE ANALYZED:

09/17/92

DATE REPORTED:

09/24/92

**CUSTOMER:** 

Excel Trans, Inc.

**REQUESTER:** 

Mary Boyd

**PROJECT:** 

Chromex

Toxicity Characteristic Leaching Procedure

Sample Type: Extract of Solid

		<u>East</u>	and West	Metho	d Blank	OC Summary		
Method and Constituent:	<u>Units</u>	Concen- tration	Reporting <u>Limit</u>	Concen- tration	Reporting <u>Limit</u>	% Recovery	% RPD	
EPA Method 7190:								
Chromium	ug/1	1,800	50	ND	50	105	*	
Chromium Recovery Correct	ug/1	1,700						
EPA Method 7210:								
Copper	ug/1	ND	200	ND	200	102	0.0	

Concentrations reported as ND were not detected at or above the reporting limit.

The RPD is not reportable since the sample prepared in duplicate was not detectable.

## Trace Analysis Laboratory, Inc.

LOG NUMBER: 2475
DATE SAMPLED: 09/10/92
DATE RECEIVED: 09/10/92
DATE EXTRACTED: 09/16/92

DATE ANALYZED: 09/17/92 DATE REPORTED: 09/24/92

PAGE:

Two

	Sample Type: Water									
		Ea	st	We	st	Method Blank				
Method and Constituent:	Units	Concen- tration	Reporting Limit	Concen- tration	Reporting <u>Limit</u>	Concen- tration	Reporting Limit			
EPA Method 7190: Chromium	ug/1	500	50	160	50	ND	50			
EPA Method 7210: Copper	ug/1	ND	200	ND	200	ND	200			
Method and Constituent:	<u>Units</u>	OC S % Recovery	ummary % RPD			•				
EPA Method 7190: Chromium EPA Method 7210:	ug/1	104	*							

Concentrations reported as ND were not detected at or above the reporting limit.

107

ug/1

Copper

\* The RPD is not reportable since the sample prepared in duplicate was not detectable.

Louis W. DuPuis

Quality Assurance/Quality Control Manager

## APPENDIX H

Analysis of Concrete Vaults

# TZI

#### CHAIN OF CUSTODY RECORD

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Company Name and Address:								/ 1	$o'_{l,\lambda}$	/	/ /	/ /	
EXCEL TRANS 290 W CHANNEL								/ W	<b>)</b> //	/	/ /		
RO. BENICIA						ļ	1	' <b>()</b> }'	- /	<i>'</i> /	′ /		
Project N	P.O. BENICIA Project Manager PAT KELLY						Analyses: REMARKS						
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Rese ived	by: (s	ignatur	e )	Date/Tir	me Relinquished by: (signatore) Date/Tim						Date/Time		
Smith Sluft (AL) 4/3/923													
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April 7, 1992

Mr. Patrick Kelly Excel Trans, Inc. P.O. Box 866 Benicia, California 94510-0866

Dear Mr. Kelly:

Trace Analysis Laboratory received one solid sample on April 3, 1992 for your Project No. 022011, Charles Lowe/Chromex (our custody log number 1965).

This sample was analyzed for Chromium. Our analytical report and the completed chain of custody form are enclosed for your review.

Trace Analysis Laboratory is certified under the California Environmental Laboratory Accreditation Program. Our certification number is 1199.

If you should have any questions or require additional information, please call me.

Sincerely yours

Jennifer (Pekol

Project Specialist

Enclosures

Trace Analysis Laboratory, Inc.

3423 Investment Boulevard, #8 • Hayward, California 94545

Telephone (510) 783-6960 Facsimile (510) 783-1512

72

LOG NUMBER:

1965

DATE SAMPLED: DATE RECEIVED: 04/03/92

DATE EXTRACTED:

04/03/92 04/06/92

DATE ANALYZED:

04/07/92

DATE REPORTED:

04/07/92

**CUSTOMER:** 

Excel Trans, Inc.

REQUESTER:

Patrick Kelly

PROJECT:

No. 022011, Charles Lowe/Chromex

Sample Type: Solid

022011 #1

Method Blank Concen- Reporting

OC Summary % %

Method and Constituent:

Concen- Reporting Units tration Limit

tration

\_\_Limit Recovery \_\_R

EPA Method 7190:

Chromium

ug/kg 7,200,000

1,200

ND

1,200

82

0.8

Concentrations reported as ND were not detected at or above the reporting limit.

Louis W. DuPuis

Quality Assurance/Quality Control Manager