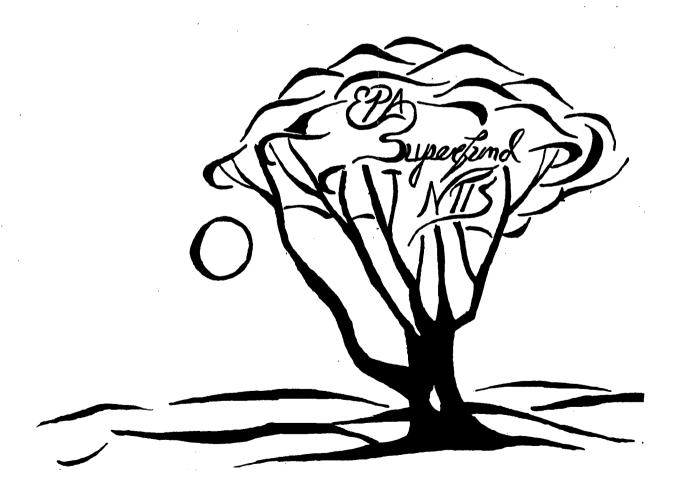
EPA Superfund Record of Decision:

Northwest Transformer South Harkness Street, Everson, WA, 9/29/94



Northwest Transformer South Harkness Street Superfund Site

Final Remedial Action Plan

RECORD OF DECISION

September 29, 1994

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 1200 SIXTH AVENUE SEATTLE, WASHINGTON 98101

Northwest Transformer South Harkness Street Superfund Site Final Remedial Action Plan Record of Decision

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Record of Decision Declaration for the Northwest Transformer South Harkness Street Site Everson, Washington

Statement of Basis and Purpose

This decision document presents the selected remedy for the Northwest Transformer South Harkness Street Site in Everson, Washington, developed in accordance with the Comprehensive Environmental Response, Compensation and Liability Act of 1980 ("CERCLA") as amended by the Superfund Amendments and Reauthorization Act of 1986, and to the extent practicable, the National Contingency Plan ("NCP"). This decision is based on the Administrative Record for this site, updated in August, 1994. The attached index identifies the items which comprise the Administrative Record upon which the selection of the Remedial Action is based.

The Washington Department of Ecology concurs with the selected remedy. A signed statement to that effect is included on page 3.

Description of the Selected Remedy

- The selected remedy under CERCLA authority is no further action.

In order to verify that groundwater in the vicinity of the site remains uncontaminated now that response activities are complete, groundwater monitoring must continue until the CERCLA five-year review is performed, at which point EPA will determine whether continued monitoring is necessary.

Notice of Additional State Requirements

Although not part of the EPA selected remedy, the State of Washington requires, pursuant to the Model Toxics Control Act (MTCA; WAC 173-340), filing of institutional controls in the form of deed notices that inform future property owners of the presence of Total Petroleum Hydrocarbons and Polychlorinated Biphenyls remaining on site above MTCA cleanup levels. The State will be responsible for enforcing this requirement, if necessary.

Declaration Statement

No further remedial action under CERCLA is necessary at this site to protect public health or the environment, because a

previous Removal Action eliminated the risks posed by the site, as measured by EPA's CERCLA guidance.

EPA has determined that its response at this site is now complete. Therefore, this site now qualifies for inclusion on the Construction Completion List.

While the Removal Action eliminated the need to take further action and the threat of direct contact exposure, some hazardous substances remain on site in soils. To ensure that these contaminated soils do not contaminate the groundwater, a review will be conducted within five years of this date to ensure that the remedy remains protective of groundwater.

<u>%|29/94</u>

Chuck Clarke

Regional Administrator

U.S. Environmental Protection Agency, Region 10

RECORD OF DECISION NORTHWEST TRANSFORMER SOUTH HARKNESS STREET SITE EVERSON, WASHINGTON

Signature and Support Agency Acceptance of the Remedy

The state of Washington concurs with the selected remedy under CERCLA, No Further Action.

Although not part of the EPA selected remedy, the state of Washington requires pursuant to the Model Toxics Control Act (MTCA; WAC 173-340) filing of institutional controls in the form of deed notices that inform future property owners of the presence of Total Petroleum Hydrocarbons and Polychlorinated Biphenyls remaining on site above MTCA cleanup levels. The state will be responsible for enforcing this requirement, if necessary.

[NAME]

Washington State Department of Ecology

Record of Decision Northwest Transformer South Harkness Street Site Decision Summary

Site Name, Location and Description

This Record of Decision describes the selected remedy for the Northwest Transformer South Harkness Street Site (the "Site"). The Site is located in the City of Everson, in Whatcom County, Washington.

The Northwest Transformer Service Company ("the Company") operated a transformer reclamation, storage, and manufacturing facility at 107 South Harkness St. from 1958 until 1987. The facility encompassed approximately 0.5 acres and consisted of a structure (three interconnected buildings) and a concrete parking lot. The Site was added to the National Priorities List ("NPL") on February 20, 1990.

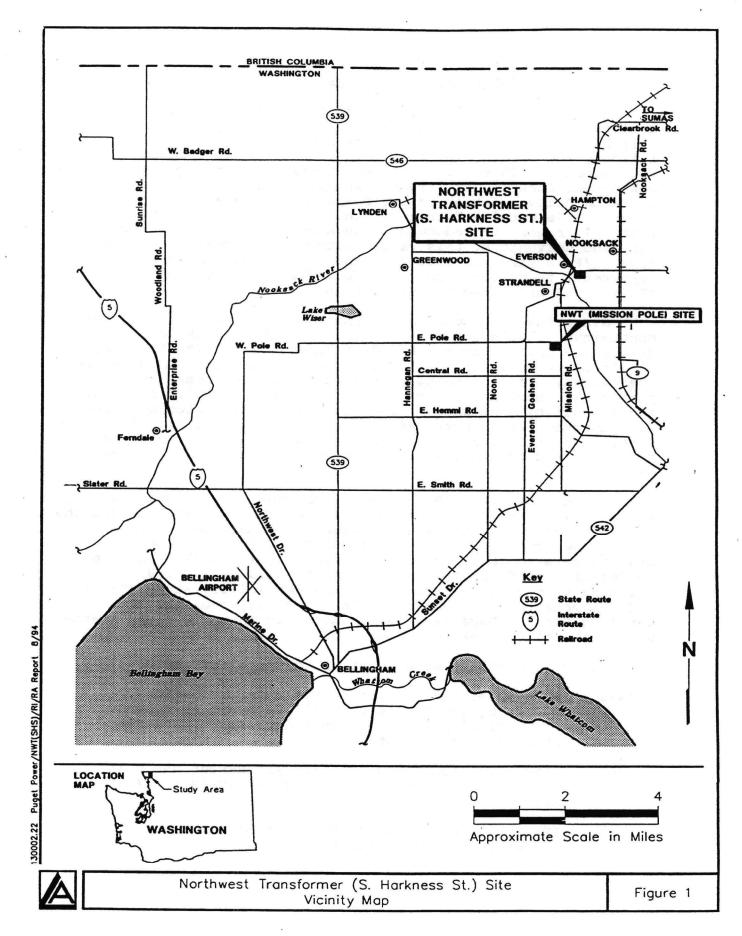
The Site is located in downtown Everson, Washington (see Figure 1, next page). A single-family residence is located south of the Site, which is also adjacent to a restaurant and a small office building. Beyond the residence is a city playground and park.

There are approximately 400 residents, two parks and one school within 1 mile from the Site. The town of Nooksack is approximately 0.75 miles to the northeast and the town of Lynden is approximately 5 miles northwest of the Site with rural farm land comprising most of the surrounding area.

The main Nooksack River channel is located approximately 1,000 ft southwest of the Site, and flows to the northwest in this area. The town and Site are within the 100-year floodplain of the river and have been flooded several times in recent years. The Site is generally level, with an average slope of less than 1 percent to the west. Ground surface elevations at the Site are about 75 to 80 ft above mean sea level.

Groundwater is very shallow in the vicinity of the Site, approximately four feet below the ground surface. The direction of flow is toward the river. The groundwater is not used as drinking water. The city water supply comes from groundwater wells located in a different aquifer across the river to the south.

No wetlands, endangered species, or national historic places were identified at or near the Site.



Site History and Enforcement Actions

Based on inspections conducted by the United States Environmental Protection Agency ("EPA") in 1977 and 1979, Polychlorinated Biphenyls ("PCBs") were discovered in the building and parking lot on-Site. EPA fined the Company for violations of PCB requirements set forth under the Toxic Substances Control Act ("TSCA") in 1981. In 1985, EPA conducted a CERCLA Removal Action at the Company's salvage yard, located about a mile outside Everson at the intersection of Mission and East Pole roads, to reduce hazards associated with high levels of PCBs and solvents at this yard. After the Removal Action, the Mission/Pole yard was shut down and all operations were reportedly transferred to the Site. The Site was proposed to the NPL in 1987 and added to the list on February 21, 1990.

Since the Site comprises a small area of property and the contaminant levels found in previous investigations were low, EPA determined that a focused Remedial Investigation ("RI") approach should be taken initially to characterize the Site and determine whether any off-Site pathways needed to be addressed. Of particular concern was the condition of the old building on-Site and the question of whether contaminants had migrated off-Site and impacted the Nooksack River (located about 3/4 mile SW of the Site), and/or if PCB-contaminated oil burned in the building for heat resulted in significant emissions or deposition of hazardous substances.

On December 26, 1991 EPA notified over 100 Potentially Responsible Parties ("PRPs") of their potential liability and the need for action at the Site. A steering committee representing sixteen generator PRPs (customers of the Company who sent transformers to the Site and the Mission/Pole yard) signed an Administrative Order on Consent ("AOC") on June 17, 1992, agreeing to perform a focussed RI and Feasibility Study ("FS") and, if necessary, a Removal Action. EPA approved the RI Sampling Plan in December, 1992, and field investigations started during the first week of January, 1993.

Other significant milestones of this project included:

- 4/93 PRPs submitted results of Field Investigations, including the Preliminary Air Pathways Assessment, draft Pipeline and Sediments Assessment, and Site Structure Assessment;
- 6/93 PRPs submitted Removal Action Assessment and draft Engineering Evaluation and Cost Analysis ("EE/CA") of Removal Action Alternatives;
- 8/93 EPA published EE/CA and Proposed Plan for Removal Action for public comment;

- 9/93 Public Meeting held to discuss Proposed Plan for Removal Action;
- 10/93 EPA signs Removal Action Memorandum;
- 11/93 PRPs begin Removal Action field work;
- 6/94 Removal Action completed; validated sampling results provided to EPA;
- 6/94 EPA certified completion of Removal Action Tasks, completed draft Risk Assessment and determined that no FS was necessary;
- 8/94 RI Report submitted to EPA;
- 8/94 Proposed Plan for No Further Action under CERCLA issued for Public Comment;
- 9/94 No comments received; Record of Decision prepared.

Highlights of Community Participation

The public was notified of the placement of the Site on the NPL on February 21, 1990 by a fact sheet and public notice. A fact sheet and public notice were also provided when notice letters were sent by EPA to the PRPs in December 1991, when the Removal Action was proposed by EPA in August 1993, and several times during performance of the Removal Action.

A public comment period was held from August 16 to September 15, 1993 on the proposed Removal Action. The public was notified at that time that if the Removal Action was fully successful and no further contamination was detected, EPA may issue a Record of Decision requiring no further action. Public comments were considered and EPA addressed these comments in a responsiveness summary. Two fact sheets were issued during the Removal Action to inform the public of the results of the action and EPA's future plans for the Site.

During planning for and implementation of the Removal Action, the PRPs and EPA worked closely with the City of Everson to ensure that community concerns were addressed.

EPA issued the Proposed Plan for the Final Remedial Action Plan describing the decision to take no further action, on August 24, 1994. A public comment period on the RI Report and Proposed Plan was held from August 26, 1994 until September 26, 1994. A fact sheet and two public notices were issued by EPA and an

article about this matter was printed in the Bellingham Herald. No public comments were received by EPA.

Site Characteristics

A. Pre-Removal Action Site Condition

Results from the RI Field Investigations were provided to EPA in April, 1993. A full priority pollutant scan was done but no contaminants of concern were found in groundwater at the Site. However, the investigations confirmed the presence of hazardous substances, pollutants and contaminants in the building structure, the concrete floor slabs, and the soil underlying the building and the parking lot, at levels including:

- O PCBs up to 89 parts per million ("ppm") in soils and structural materials;
- O Xylenes up to 2,800 ppm in soils;
- O Carcinogenic Polyaromatic Hydrocarbons up to 62 ppm in soils;
- O Total Petroleum Hydrocarbons ("TPH") up to 250,000 ppm in the floor residue and up to 63,000 ppm in soils beneath the structures.

The possibility of significant contamination of the Nooksack River and/or sediments was determined to be unlikely due to the earlier sampling along the river and sampling at the Site and in/ the storm drains. The investigations also found that the drain lines from the building were connected to the storm drain (which directly discharges into the river) from 1958-1971, but that from 1972-1988 the drain lines were connected to the sanitary sewer and went to the City wastewater treatment plant. The air pathway was also ruled out as a pathway of significant concern since no evidence of dioxin and/or furan contamination was found at the Site or in samples taken from down-wind locations near the Site.

The building on-Site was examined by a structural engineer, who confirmed that the structure was unsound and deteriorating. Further deterioration of the building, particularly during winter, was determined to be a potential threat that could release hazardous substances to the environment.

Following initial RI field investigations, the PRPs performed a Removal Action Assessment and prepared an EE/CA of Removal Action Alternatives for the Site. The Removal Action Assessment concluded that removal of the building and parking lot would reduce the risk of building collapse and facilitate further Site investigations. As part of the EE/CA, the PRPs identified Applicable or Relevant and Appropriate Requirements ("ARARS") for Removal and Remedial Action at the site. The removal action goals and the preferred alternative in the EE/CA were designed to

meet remedial action cleanup requirements, if possible, by removing and disposing of all PCBs in excess of 10 ppm, and if practicable, all PCBs in excess of 1 ppm.

While EPA evaluated the preferred alternative proposed by the PRPs, EPA required the PRPs to remove and dispose of the contents and nonstructural components of the Site buildings, including certain drums of investigation-derived residual materials stored on-Site. Potentially hazardous debris was disposed of at the Chemical Waste Management Hazardous Waste Landfill in Arlington, Oregon during May of 1993. Drums containing other building contents and investigation-derived residual materials were sent to off-Site treatment, storage, and disposal ("TSD") facilities. The quantities, types and disposal location of wastes disposed during this action (and in the subsequent Removal Action) are described in Table 1 at the end of this document.

After review of the EE/CA, EPA agreed with the PRPs' evaluation that Removal Action would facilitate completion of the RI and that the preferred alternative could potentially achieve remedial action cleanup goals. EPA prepared and issued a Proposed Plan for a non-time critical Removal Action in August, 1993, and held a public comment period on this proposal. After the comment period, EPA prepared a Responsiveness Summary addressing the public comments.

During the comment period, the Washington State Department, of Ecology ("State") determined that the removal of additional soil beneath the parking lot, contaminated with TPH and PCB, would be necessary to meet state cleanup standards governing final remedial action for the Site. The PRPs agreed to remove the additional soil in an effort to meet CERCLA and Washington Model Toxics Control Act ("MTCA") requirements for the Site.

EPA signed and issued a Removal Action Memorandum October 8, 1993. This decision memorandum specified that the cleanup goal for the Site was to remove and dispose of all PCBs in excess of 1 ppm and all TPH in excess of 200 ppm, to the extent practicable, in an effort to make the Removal Action the final remedial action for the Site. Details of the cleanup action are provided below.

B. Scope and Role of the Removal Action

The goal of the Removal Action was to eliminate the risk of the on-Site building collapsing, to provide additional data for the RI and Risk Assessment, and to address cleanup of the Site in accordance with final remedial action requirements, if possible.

The Removal Action was performed from November, 1993, through June, 1994, and included the following actions (see

Figures 2 through 5 and Table 1 at the end of this document or the Remedial Investigation Report for more detailed information):

- The building and floor slab were demolished and disposed of at permitted TSCA, Resource Conservation and Recovery Act ("RCRA"), and/or demolition debris facilities (as appropriate).
- Soil below the buildings and the parking lot containing greater than or equal to 1 ppm PCBs was excavated, removed and disposed of to the extent practicable. Over 98% of PCBs were removed.
- Soil containing 1 or more ppm but less than 100 ppm PCBs was disposed of at the Chemical Waste Management Hazardous Waste Landfill in Arlington Oregon.
- Soils shown to contain greater than or equal to 100 ppm PCBs were incinerated and disposed of at the Aptus hazardous waste incinerator in Aptus, Utah.
- Over 95% of the TPH found at the Site was removed. TPH-contaminated soils were disposed of in accordance with the PCB concentrations in the soil. Soils that contained TPH but no PCBs above the cleanup level were also taken to the Chemical Waste Management Landfill in Arlington Oregon;
- Demolition debris that was shown not to contain hazardous substances was disposed of at the Columbia Ridge Solid Waste Landfill.
- Soil sampling was performed at the base of the soil excavations to determine whether the Removal Action was successful and to obtain soil data for EPA's subsequent baseline Risk Assessment.
- Following completion of soil excavation and confirmation sampling activities, the excavations with back-filled with clean soil and gravel and then covered with an asphalt cap. The cap was designed to allow the Site to be used for local parking and/or storage.

Based on the confirmation samples, the Removal Action was successful and met ARARs and Removal Action goals to the extent practicable.

C. Current (Post-Removal Action) Condition

The confirmation samples collected after the Removal Action were used in conjunction with existing data to complete the Risk Assessment and RI. The Risk Assessment showed that current and

future potential risks posed by residual contamination at the Site are within the acceptable risk range of 10^{-5} or less.

The Site now consists of two asphalt parking lots and an alley covering about four feet of clean soil. In the deeper soils at most locations PCB concentrations are less than 1 ppm. Two locations show evidence of low-level PCB contamination at depth beneath the clean soil and cap (7 ppm at 6 feet below ground surface and 28 ppm at 12.5 feet below ground surface).

Samples taken from soils outside the area of the Removal Action in the yard of the adjacent residence and park contained one PCB value at 1.2 ppm and one TPH value of 330 ppm. The other samples were below the cleanup action levels and most samples were non-detect for PCBs. Some samples also contained levels of arsenic which appear to be slightly elevated (8 ppm). However, since those results were isolated and well below the State's background cleanup level of 20 ppm, EPA determined that no further action was necessary.

Summary of Site Risks

The Baseline Human Health and Environmental Risk Assessments were completed subsequent to the Removal Action. Due to the success of the Removal Action, the assessments support the conclusion that no further action is necessary at the Site to protect public health or the environment. The baseline Risk , Assessment is included in the RI Report.

There is no risk of long-term direct contact exposure from materials on-Site, since all contaminated soil was removed down to a depth of at least four feet, covered with clean soil and paved with asphalt. No risk was found from ingestion of groundwater, since no constituents of concern were detected in the groundwater. In addition, there are no known uses of the groundwater in this vicinity for drinking water.

In an effort to be conservative and provide useful estimates of the reasonable maximum exposure ("RME"), the risk estimates were done in two ways. One assumed lifetime exposure to the maximum detected concentration in the remaining surface samples taken from outside the area of the Removal Action, from the yard of the residence adjoining the Site, and from the adjacent park. A second estimate was done by combining the values from all samples remaining from the surface down to 3 feet below ground surface, using multiple samples from a single location in order to better represent lifetime exposure. Using both methods, the lifetime excess risk from exposure to arsenic and/or PCBs in the event of no further action was found to be 10⁻⁵ or less.

Human health hazards and risks for the Site were evaluated for residential land use in the Risk Assessment. The RME assumptions included ingestion and dermal exposure to the 95% Upper Confidence Limit concentration of a chemical of potential concern for 350 days/year for 30 years. An excess lifetime carcinogenic risk of 2 in 1,000,000 was estimated from the PCBs (Aroclor-1254 and Aroclor-1260). The RME scenario for exposure to the 8 ppm arsenic resulted in a carcinogenic risk estimate of 3 in 100,000. Using the same exposure parameters, risks from background arsenic concentrations in soil would also result in a risk of 3 in 100,000. No Site related non-carcinogenic chemical hazards were identified.

TPH was present in soils at the Site at elevated concentrations, however, the TPH was characterized as heavy transformer or mineral oil and did not contain benzene, ethylbenzene, toluene, xylenes or other contaminants at levels which are considered of concern in the Risk Assessment. Since those compounds were all below health-based levels of concern and since no TPH or related constituents have been found in groundwater samples, TPH is not considered a contaminant of potential concern to human health at the Site.

Based on the conservative nature of the exposure point concentrations for PCBs and arsenic, as well as conservative estimates of exposure and carcinogenicity, actual Site risks are likely to be considerably less than the calculated values.

No significant ecological impacts were identified during the RI. Since contaminants have been removed and/or capped at the Site, there is no significant pathway for ecological exposures at the Site.

When the Site was listed, the other main area of potential environmental concern was the Nooksack River in the vicinity of the sewer outfall. The highest detected PCB concentration in sediments at that location (0.16 ppm) was evaluated using the August 1990 EPA Guidance on Remedial Actions for Superfund Sites with PCB Contamination. The guidance states that the Department of Interior has concluded that PCB concentrations of 1-2 ppm will be generally be protective of wildlife such as migratory birds. Since the highest detected concentration at the outfall was below that value and because the Site itself is now paved, exposures to ecological receptors to contaminated areas are considered very low and quantification of potential risks from the sediments was not considered necessary.

OSWER Directive 9355.0-30 (April 22, 1991) states that at sites where the cumulative site risk is less than 10⁻⁴, response action is generally not warranted unless there are adverse environmental impacts, exceedences of Maximum Contaminant Limits

("MCLs"), or for other site-specific reasons. Because there are no adverse environmental impacts, exceedences of MCLs, or other site-specific reasons which would dictate otherwise, there was no need to perform a FS or satisfy ARARs, and no further action is necessary at the Site.

Description of the Selected Remedy

The selected remedy under CERCLA authority is no further action.

In order to verify that groundwater in the vicinity of the Site remains uncontaminated now that response activities are complete, groundwater monitoring must continue until the CERCLA five-year review is performed, at which point EPA will determine whether continued monitoring is necessary.

Notice of Additional State Requirements

Although not part of the EPA selected remedy, the State of Washington requires, pursuant to the Model Toxics Control Act (MTCA; WAC 173-340), filing of institutional controls in the form of deed notices that inform future property owners of the presence of Total Petroleum Hydrocarbons and Polychlorinated Biphenyls remaining on Site above MTCA cleanup levels. The State will be responsible for enforcing this requirement, if necessary.

Groundwater Monitoring

As stated above, in order to verify that groundwater in the vicinity of the Site remains uncontaminated, groundwater monitoring using the wells on and near the Site will continue until a five-year review is performed by EPA, at which time EPA will determine whether continued monitoring or other action is necessary.

Five-Year Review

Section 121 of CERCLA requires a five-year review of any remedy that results in hazardous substances, pollutants or contaminants remaining at the Site. Since hazardous substances, pollutants or contaminants will remain at the Site, at least one five-year review will be conducted by EPA. The purpose of the five year review will be to determine if there is any evidence of groundwater contamination at the Site. If no evidence of contamination is found in the period between this Record of Decision and the first five-year review, EPA will evaluate at

that time whether additional monitoring and/or reviews are necessary.

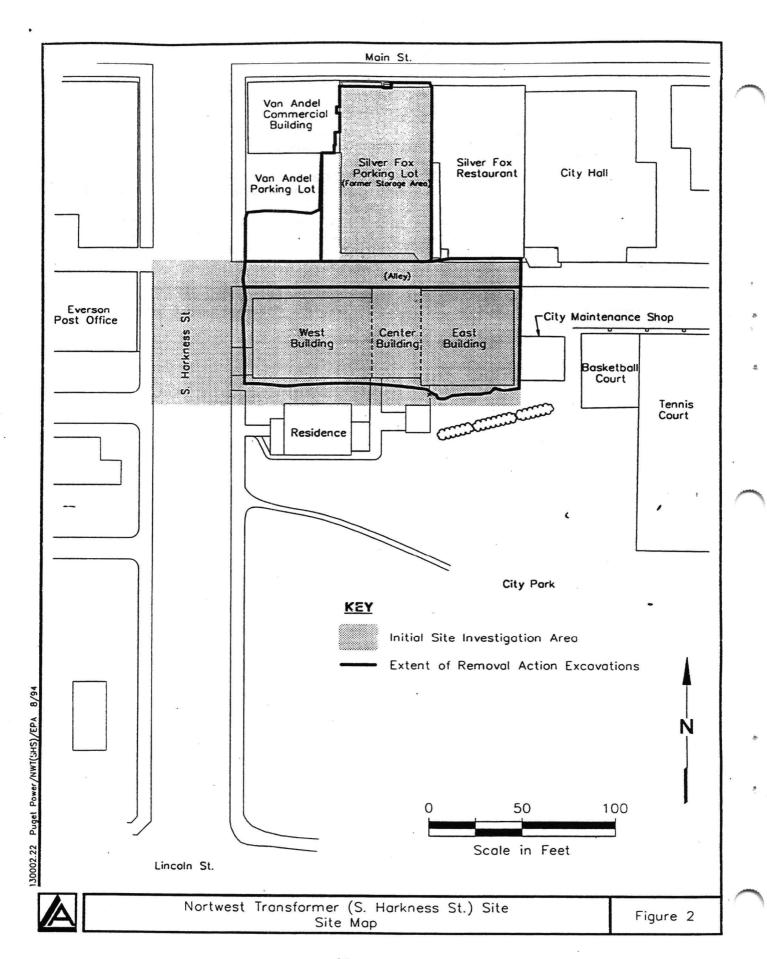
Documentation of Significant Changes

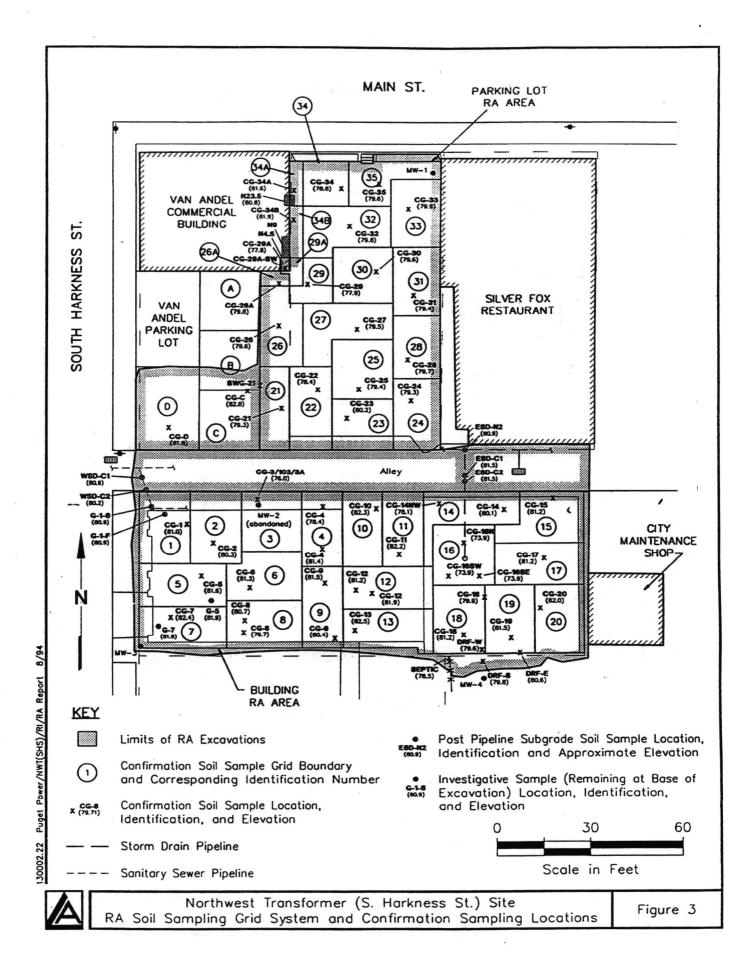
No changes were made from the Proposed Plan.

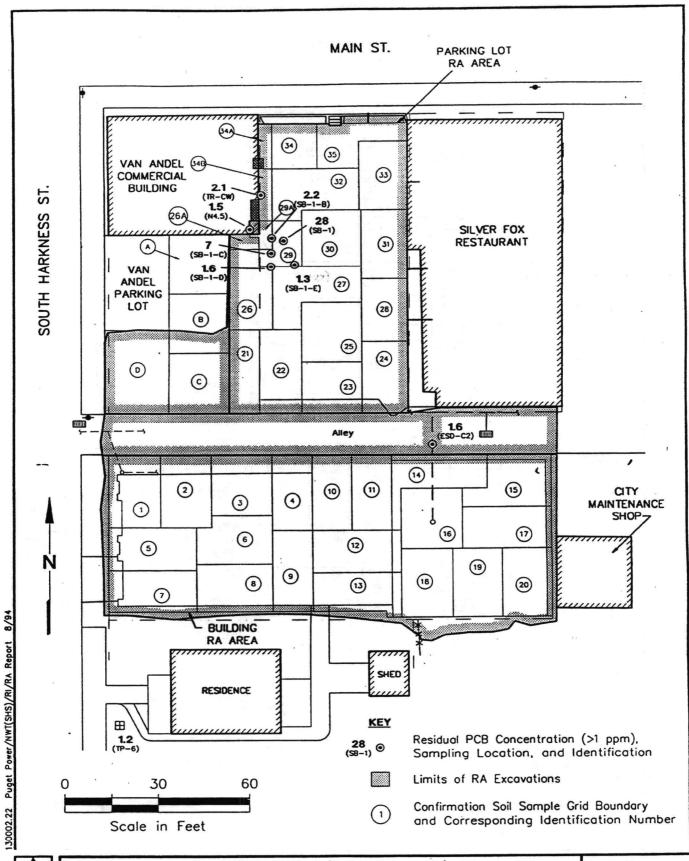
Record of Decision Northwest Transformer South Harkness Street Site Responsiveness Summary

A public comment period regarding the Proposed Plan for No Further Action and the deed notices to necessary to satisfy state MTCA requirements, was held from August 26, 1994 through September 26, 1994. A fact sheet and two public notices were issued by EPA and an article was published in the Bellingham Herald describing the Proposed Plan and how and when to submit comments to EPA.

No public comments were received by EPA. Therefore, no Responsiveness Summary addressing public comments has been prepared by EPA.







Northwest Transformer (S. Harkness St.) Site Post RA Residual PCB Concentrations

Figure 4

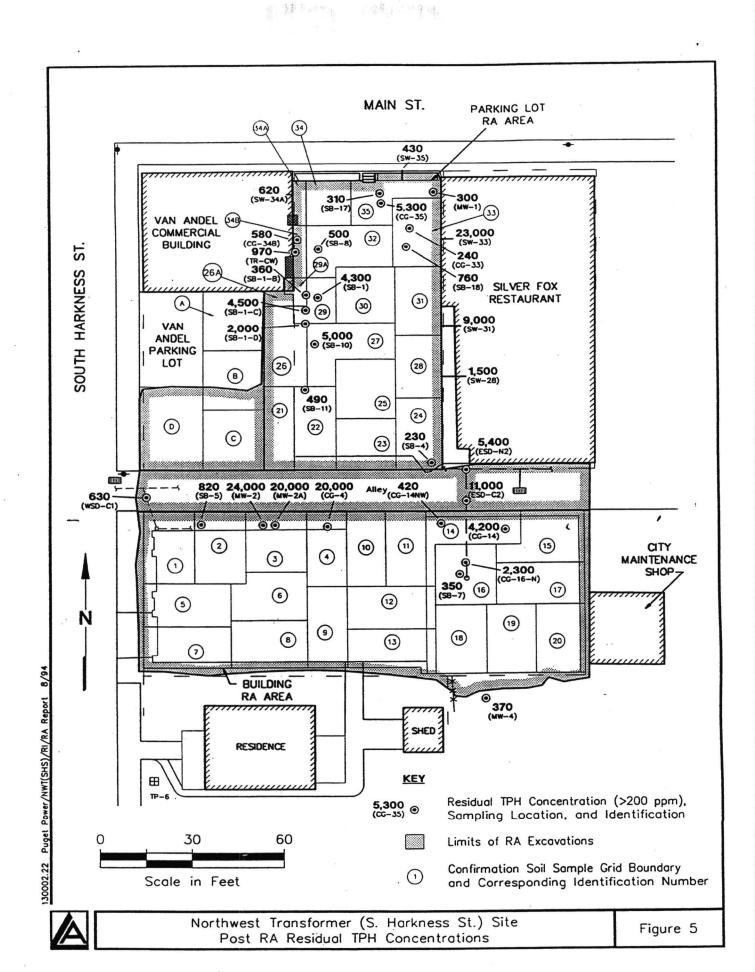


TABLE 1

NORTHWEST TRANSFORMER (S. HARKNESS ST.) SITE SUMMARY OF WASTE DISPOSAL QUANTITIES⁽⁴⁾

Material Description	Quantity	Waste Manifest Nos.
Soil Soil with <100 ppm PCBs disposed in TSCA/RCRA cell (L-13) at the Chemical Waste Management of the Northwest landfill near Arlington, Oregon (Arlington	3,075.72 tons ^(b)	26-117 119-125
laħdfill) Soil with ≥100 ppm PCBs disposed at the Aptus, Inc. incineration facility in Aragonite, Utah	14.4 tons ^{co}	118
Soil with <1 ppm PCBs disposed at the Columbia Ridge Subtitle D solid waste landfill near Arlington, Oregon (Columbia Ridge landfill)	-32.5 tons	109534-109536 ^{(d)(e)}
Demolition Debris Building demolition debris disposed in TSCA/RCRA cell (L-13) Arlington landfill ⁽⁹⁾	428.63 tons ^(g)	1-25 93074-93077
Parking lot pavement demolition debris disposed at the Columbia Ridge landfill	173.44 tons ^(h)	103182-103184 ^(a) 103186-103188 ^(a) 109534-109536 ^{(d)(e)}
Liquids Excavation water with <5 ppb PCBs disposed at the City of Bellingham wastewater treatment facility	31,160 gal ^ω	18974 ^(d) , 18990 ^(d) , 18987 ^(d) , 19000 ^(d) , 19004 ^(d) , 19635 ^(dX))
Treated excavation water disposed at the City of	700 gal	19636 ^{(d)(1)}
Bellingham wastewater treatment facility th Investigation-derived residual water with <5 ppb PCBs disposed at the City of Bellingham wastewater treatment facility	~1,300 gal	19064 ^(4Xm)
Decontamination water with <5 ppb PCBs disposed at the City of Bellingham wastewater treatment facility	3,981 gal	19064 ^{(d(m)} , 19635 ^{(d(l))} 19636 ^{(d(l)}
Decontamination water containing hexane/dilute nitric acid/PCBs disposed at the Osco Henderson treatment facility in Colorado	110 gal	94348
Lab Packs (Building Contents Removal) Flushate containing kerosene/naphtha/ PCBs disposed at the Rollins Environmental Services, Inc. incineration	~60 gal ⁽ⁿ⁾	93064
facility in Deer Park, Texas Soil and ash residue containing ≥100 ppb PCBs disposed at the Rollins Environmental Services, Inc. incineration	~0.44 tons ⁽ⁿ⁾	93064
facility in Deer Park, Texas Light ballasts containing PCBs disposed at the Chemical Waste Management of the Northwest landfill in Arlington,	0.1 tons	09303
Oregon Acid liquid containing methylene chloride, formic acid, methanol, and phenol disposed at the Aptus, Inc. incineration facility in Aragonite, Utah	~1.5 gal ⁽ⁿ⁾	93062

NORTHWEST TRANSFORMER (S. HARKNESS ST.) SITE SUMMARY OF WASTE DISPOSAL QUANTITIES^(a)

Material Description	Quantity	Waste Manifest Nos.
Wood finish containing petroleum distillates, and a grease and water liquid disposed at the Aptus, Inc. incineration	~3 gal ⁽ⁿ⁾	93062
facility in Aragonite, Utah Solid paint disposed at the Aptus, Inc. incineration facility in Aragonite, Utah	~9 gal ⁽ⁿ⁾	93062

- (a) The quantities presented in this table are based on the final certified weight and volumes as reported by the respective disposal facilities, unless otherwise noted.
- (b) This quantity includes investigation-derived residual soil, approximately 227 tons of soil disposed with the building floor slab and foundation debris (see manifest Nos. 1-25), and approximately 157.7 tons of soil and asphalt pavement removed from the alley (manifest Nos. 119-123).
- (c) This quantity includes residual hot spot investigation-derived soil.
- (d) Load number (not a hazardous waste; therefore, no manifest number required).
- (e) Load Nos. 109534-109536 consist of approximately 32.5 tons of soil excavated from Grid D in the Van Andel parking lot and approximately 33 tons of asphalt pavement removed from the Van Andel parking lot.
- (f) Building demolition debris includes 14.63 tons (78.96 yd³) of building contents and components removed in May 1993 (e.g., furnace, oven, transformer casings, work benches/tables, wood/metal/paper debris, etc).
- (g) This quantity includes approximately 41 tons of building foundation debris disposed with soil containing <100 ppm PCBs (see manifest Nos. 26-117).
- (h) This quantity consists of concrete parking lot pavement and asphalt pavement from the Van Andel parking lot.
- (i) Excavation water includes water removed from the excavations at Grid Nos. 2-4, 8-10, and 14-19, and the old septic tank.
- (j) Load No. 19635 included approximately 1,050 gal of water removed from the old septic tank, 110 gal of excavation water with <5 ppb PCBs removed from grid 29/29A, and approximately 2,580 gal of investigation-derived residual decontamination water and decontamination water resulting from the RA tasks.
- (k) The excavation water containing 7 ppb PCBs was treated with an activated carbon filter system prior to disposal.
- (1) Load No. 1936 included approximately 700 gal of treated excavation water and approximately 200 gal of treated decontamination water.
- (m) Load No. 19064 included approximately 1,300 gal of investigation-derived residual water and 1,200 gal of decontamination/excavation water. The decontamination/excavation water consisted of City of Everson tap water used to rinse the inside of two 6,000-gal storage tanks that previously contained Grid 3 excavation water.
- (n) Receipt of final certified quantity pending.