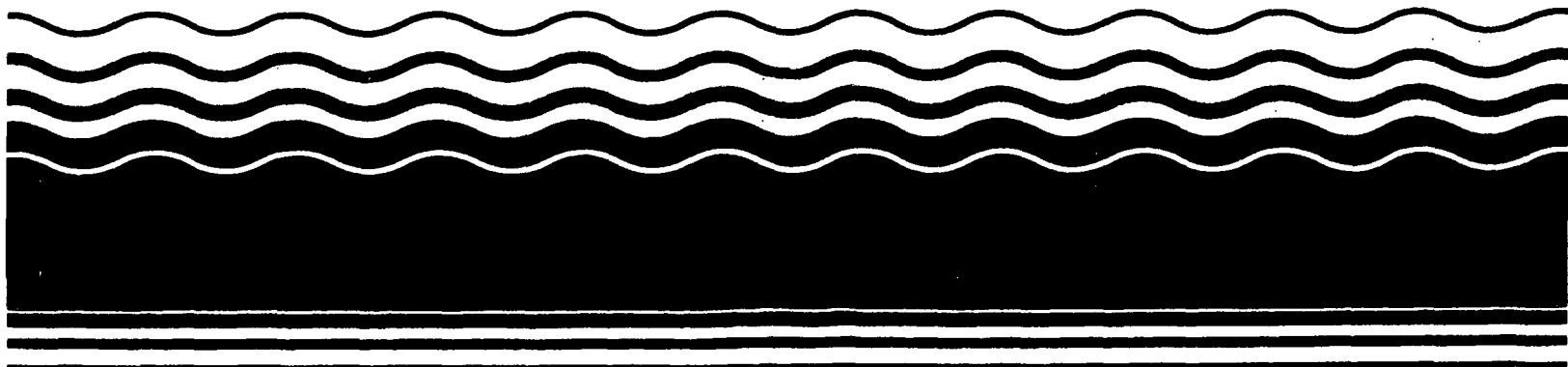


**PB98-963107  
EPA 541-R98-038  
September 1998**

**EPA Superfund  
Explanation of Significant Difference  
for the Record of Decision:**

**Pacific Hide and Fur Recycling Company  
Pocatello, ID  
5/14/1998**





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 Sixth Avenue  
Seattle, Washington 98101

May 13, 1998

Reply To  
Attn Of: ECL-113

**MEMORANDUM**

SUBJECT: Pacific Hide & Fur ESD Addendum

FROM: Neil E. Thompson  
Project Manager, Unit 4

A handwritten signature of Neil E. Thompson in black ink.

THROUGH: Ann Williamson, Unit Manager  
Site Cleanup Unit 4

A handwritten signature of Ann Williamson in black ink.

TO: Randall F. Smith, Director  
Office of Environmental Cleanup

The attached "Addendum #1" to the Pacific Hide and Fur Co., Explanation of Significant Differences (ESD), provides a legal description to the Restricted Area that was identified in the ESD. A land survey of the Restricted Area was done in cooperation with the Idaho Department of Environmental Quality to permanently locate the area. The surveyed Restricted Area lies within the general area described in the ESD. This addendum does not change any part of the ESD which was signed on April 20, 1998.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 Sixth Avenue  
Seattle, Washington 98101

April 15, 1998

Reply To  
Attn Of: ECL-113

MEMORANDUM

SUBJECT: ESD - Pacific Hide and Fur

FROM: James Oesterle  
ORC Attorney

Neil Thompson  
Project Manager

*Net 4/15/98*

TO: Randy Smith  
Office Director

Attached are two documents for your signature; the Explanation of Significant Difference (ESD), and the First Supplement to Administrative Order for Remedial Action. Both of these documents reflect the decision by the PRPs to clean up the Pacific Hide and Fur Superfund site to a more protective level than was required by the Record of Decision (ROD). The ROD called for clean up to industrial use criteria, but the PRPs chose to remove additional contamination so that the site can be classified as residential use under CERCLA. This change is more protective of human health and the environment.

# **EXPLANATION OF SIGNIFICANT DIFFERENCES (ESD)**

for the

## **PACIFIC HIDE & FUR RECYCLING CO. SUPERFUND SITE POCATELLO, IDAHO**

From the September 27, 1995,  
Final Operable Unit Record of Decision

### **1.0 INTRODUCTION**

#### **1.1 Site Name and Location**

Pacific Hide & Fur Recycling Company (Site)  
Pocatello, Idaho

#### **1.2 Lead and Support Agencies**

The U.S. Environmental Protection Agency (EPA) is the Lead Agency on this site. The Idaho Department of Health and Welfare, Division of Environmental Quality (DEQ) is the Support Agency for the site.

#### **1.3 Explanation of Significant Differences**

This document addresses a significant change to the Selected Remedy for the site-wide surface and subsurface soil excavation and off-site disposal of lead-contaminated soil described in the Final Operable Unit Record of Decision (ROD), dated September 25, 1995. The document provides an Explanation of Significant Differences (ESD) as required under Section 117(c) of CERCLA, and the National Contingency Plan (NCP), 40 C.F.R. Section 300.435(c)(2)(1).

#### **1.4 Circumstances Leading to the Changes to the ROD**

The ROD required the remediation of all lead (Pb) contaminated soils above an industrial land use scenario cleanup level of 1,000 mg/kg. During implementation of the selected remedy in 1996, the Potentially Responsible Parties (PRPs) performing the remedial actions proposed removing contaminated soils to levels at or below the more stringent residential

contamination criteria (400 mg/kg Pb). Confirmation sampling conducted by the PRPs following completion of the initial remedial action indicated that a minimal amount of lead contaminated soil remained above the residential land use level criteria. Given the low levels of remaining contamination, the PRPs proceeded in 1997 to develop and implement additional cleanup actions to remove all remaining soil with lead contamination above the 400 mg/kg level. The additional work reduced the risks to human health and the environment.

#### 1.5 Administrative Record

This Explanation of Significant Differences will become part of the Administrative Record File for the Site. The record is available in the EPA Region 10 Records Center located at 1200 6th Avenue, Seattle, Washington, and at the information repository located at the Pocatello Public Library in Pocatello, Idaho.

#### 1.6 Site Background

The Pacific Hide & Fur Recycling Company (Pacific) Superfund Site comprises an area of approximately 16.9 acres in the northwest region of Pocatello, Idaho, bounded on the north by State Highway 30, and on the south by the Union Pacific Railroad (UPRR) right-of-way. The Site is an aggregate of three contiguous properties, owned respectively by UPRR, Pacific, and the McCarty family (McCarty), Figure 1. The UPRR property comprises about 4.0 acres along the southern boundary of the Site; the Pacific property comprises approximately 4.6 acres in the northwestern region of the Site; and the McCarty property comprises approximately 8.3 acres in the eastern section of the Site and includes a former gravel pit approximately 20 feet deep and covering approximately 3 acres.

The historical and current use of the site is metal recycling. The operators buy metal scrap and sort, cut, and ship out for reprocessing. The recycling of lead-acid batteries and electrical transformers are believed to be the primary sources of the chemicals of concern (lead and PCB) that caused the soil contamination problems. The site is still operating as Pacific Steel and Recycling, Inc.

Polychlorinated biphenyls (PCBs) were detected in the Site soils in 1983 and EPA conducted an Emergency Response Action (ERA). During the 1983 ERA, EPA removed 593 capacitors, approximately 30 cubic yards of contaminated soils and 20 drums of miscellaneous hazardous wastes for off-site disposal. The Site was listed on the National Priorities List (NPL) on September 21, 1984. Various remedial activities, focusing on the PCB contamination in the Site soils, were conducted between 1983 and 1990, including issuance of a Record of Decision (ROD) in 1988 identifying solidification/stabilization as the preferred

remedy for PCB-contaminated soils. In August 1990, additional sampling conducted by EPA identified lead (Pb) contamination. In April 1992, an amended ROD was issued dividing the Site into two Operable Units (OUs). The focus of the first OU was soils contaminated with PCBs and soils contaminated with commingled PCBs and lead. Over 15,000 tons of contaminated soil and scrap were disposed of during the remedial action for the first OU in 1992.

In 1993, a Remedial Investigation/Feasibility Study (RI/FS) for the Final OU (lead-contaminated soils) was conducted by EPA's designated contractor, Ecology and Environment, Inc. (E&E), using x-ray fluorescence (XRF) equipment and confirmatory laboratory analysis. The RI/FS also incorporated data collected during the 1990 and 1991 field investigations, as well as information obtained during confirmation sampling for the first OU remedial action. Based on the findings of the RI/FS, an amended ROD was issued for the Final OU in September 1995. On July 12, 1996, EPA issued an Administrative Order to the PRPs to clean up additional lead-contaminated soils that remained after the initial remedial actions were completed to remove the PCB and lead contamination. The field work to complete this Final OU was completed on November 13, 1997.

## 2.0 DESCRIPTION OF THE FINAL OU REMEDY IN THE ROD

The Record of Decision (ROD) for the Final Operable Unit for the lead-contaminated soil and scrap metal dated September 27, 1995, is the second of two operable units for this Site. The first operable unit involved remediation of soil and scrap material contaminated with polychlorinated biphenyls (PCBs) and commingled PCBs and lead. Groundwater monitoring was continued only to confirm that chemicals from the site were not contaminating local groundwater. The Final Operable Unit includes the proper removal of the groundwater wells and ending the groundwater monitoring.

This final operable unit addresses remediation of the remaining soil and scrap material contaminated with lead. The remedial action was selected to address threats associated with lead-contaminated soil and scrap material above lead health-based levels under a future industrial land use scenario. The specific components of the ROD which are being addressed by this ESD include:

1. Excavation, processing, transport, and disposal of all lead-contaminated soil above 1000 mg/kg.
2. Implementation of institutional controls including permanent fencing to restrict public access to the Site, and property restrictions limiting future

property usage to industrial operations [emphasis added] only on all properties that comprise the Site (the form of restrictions will be determined following issuance of this ROD).

The selected final operable unit remedial action was considered protective of human health and the environment, eliminating the risks above the 1000 mg/kg lead cleanup level posed through each pathway by removal, treatment to the extent practicable, and proper [sic] disposal of lead-contaminated soil. The selected remedial action was chosen to effectively and permanently remove on-Site lead-contaminated soils above levels protective of on-Site workers under a future industrial land use scenario. The selected remedy did, however, anticipate that lead and PCBs would remain above residential health-based levels, thereby prohibiting unrestricted future land use. Reviews were to have been conducted no less often than every five (5) years following initiation of the remedial action to ensure adequate protection of human health and the environment.

### 3.0 CHANGES IN THE SELECTED REMEDY REQUIREMENTS IN THE ROD

#### 3.1 Change in the Final Operable Unit ROD

The selected remedy at the Site is changed to remove Site-wide surface and subsurface soil, with proper off-Site disposal of lead-contaminated soil above 400 mg/kg, which leaves only lead-contaminated soils which have a level protective of future residential land use. The revised remedial action effectively and permanently removes on-Site lead-contaminated soils above levels protective of future residential health-based levels thereby allowing unrestricted (residential) future land use under CERLA criteria.

The institutional controls component of the ROD is deleted. A Deed notation will be placed on the property by the PRP to address State concerns regarding potential subsurface contamination. The Deed notation will contain a recorded notice to alert the environmental agencies of any pending excavation in an area of the Site known as the Restricted Area. The Restricted Area is identified as:

that portion of the site extending from the southeastern most property corner of the Site (known originally as McCarty's Property); northwesterly along the property line for 275 feet; southwesterly 90° from the property line for 350 feet; southeasterly parallel to the above referenced property line for 275 feet; northeasterly along the property line back to the original southeastern property corner. The Restricted Area approximates a rectangular shaped parcel (275 x 350 feet) in the southeastern most corner of the Site.

Because no known hazardous materials remain on-Site above health-based levels, no Five-Year reviews of the Site are needed to ensure adequate protection of human health and the environment.

### 3.2 Basis for the Change

The EPA is making this change in the remedy requirements as stated in the Final Operable Unit ROD because the Site was cleaned up to significantly lower concentrations of lead in the soil than was required in the ROD. During the course of implementing the selected remedy, the PRPs elected to remove lead-contaminated soil to less than 400 mg/kg to meet the residential and unrestricted land use criteria. All of the identified lead-contaminated soil on the Site above 400 mg/kg was removed by the PRPs. Additional sampling was done to confirm that all PCB-contaminated soil was removed to meet the residential use criteria concentration of less than 1.0 mg/kg. This is a significant change because it allows for unrestricted future use of the land.

The institutional controls component in the ROD has been deleted because it is no longer necessary to prohibit future residential land uses at the Site. There is, however, one limited area of concern identified by the State of Idaho in which future subsurface excavation may disclose some contamination. The area of concern has been identified as the Restricted Area and is described above. While surface sampling in the Restricted Area confirmed that the 400 mg/kg cleanup level had been met, the subsurface soils were not excavated. There is presently no information to suggest that there is contamination in the subsurface. A prohibition on future excavation in the Restricted Area, without EPA and State approval, will be imposed on the present landowner and all future landowners.

## 4.0 STATUTORY DETERMINATIONS

The EPA and DEQ believe that the remedial actions, which cleaned up the Site to lower concentrations of contamination than the ROD required, still remain protective of human health and the environment even when the Site has no land use restrictions under CERCLA. The changes in the remedy as described in this ESD comply with federal and state requirements that were identified in the ROD as applicable or relevant and appropriate to this remedial action at the time the original ROD was signed, and remains cost effective.



## 5.0 SUPPORT AGENCY COMMENTS

This ESD is consistent with EPA guidance and has been reviewed by the Idaho Department of Environmental Quality (DEQ). DEQ supports this action and the implementation of the changes to the Record of Decision.

## 6.0 PUBLIC PARTICIPATION ACTIVITIES

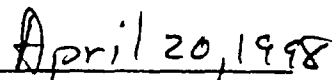
A public comment period is part of the final Consent Decree process which completes the cleanup of the Site. A Consent Decree is expected to be signed by the settling PRPs and the U.S. Government to complete the cleanup process. If there are any comments on the Consent Decree that would necessitate changes in the ROD, this ESD, or other aspects of the remedial actions, EPA would address those comments.

The public will be notified of the comment period for the Consent Decree as part of the Consent Decree process.

## 7.0 DECLARATION

This ESD change to the Final Operable Unit ROD continues to be protective of human health and the environment, complies with federal and state requirements that are legally applicable or relevant and appropriate to the remedial action, and is cost effective. This action utilizes permanent solutions and alternative treatment technologies to the maximum extent practicable and satisfies the statutory preference for remedies that employ treatment that reduces toxicity, mobility, or volume as a principal element.

  
\_\_\_\_\_  
Randall F. Smith, Director  
Office of Environmental Cleanup

  
\_\_\_\_\_  
Date

## 5.0 SUPPORT AGENCY COMMENTS

This ESD is consistent with EPA guidance and has been reviewed by the Idaho Department of Environmental Quality (DEQ). DEQ supports this action and the implementation of the changes to the Record of Decision.

## 6.0 PUBLIC PARTICIPATION ACTIVITIES

A public comment period is part of the final Consent Decree process which completes the cleanup of the Site. A Consent Decree is expected to be signed by the settling PRPs and the U.S. Government to complete the cleanup process. If there are any comments on the Consent Decree that would necessitate changes in the ROD, this ESD, or other aspects of the remedial actions, EPA would address those comments.

A public notice of the comment period for both the ESD and Consent Decree will be announced publicly as part of the Consent Decree process.

## 7.0 DECLARATION

This ESD change to the Final Operable Unit ROD continues to be protective of human health and the environment, complies with federal and state requirements that are legally applicable or relevant and appropriate to the remedial action, and is cost effective. This action utilizes permanent solutions and alternative treatment technologies to the maximum extent practicable and satisfies the statutory preference for remedies that employ treatment that reduces toxicity, mobility, or volume as a principal element.

\_\_\_\_\_  
Randall F. Smith, Director  
Office of Environmental Cleanup

\_\_\_\_\_  
Date

NAME	Thompson	Williamson	<del>Gearheard</del>	Oesterle	Kowalski	
DATE	4/15/98	aw 6 4/20/98	<del></del>	4-16-98	4/16/98	
INITIALS	Net		<del></del>	glo	g/k	

1 UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
2 REGION 10  
3

4 IN THE MATTER OF: )  
5 )

6 McCarty's/Pacific Hide and Fur )  
7 Superfund Site )

FIRST SUPPLEMENT TO  
ADMINISTRATIVE ORDER  
FOR REMEDIAL ACTION

8 Pacific Hide and Fur Depot, Inc., )  
9 a Montana Corporation, dba Pacific )  
10 Steel Hide Recycling Company; )  
11 McCarty's, Inc., an Idaho )  
12 Corporation; Lucent Technologies, a )  
13 Delaware Corporation; ANR Freight )  
14 System, Inc., a Delaware )  
15 Corporation; FMC, a Delaware )  
16 Corporation; Monsanto Company, a )  
17 Delaware Corporation; Pacific Fruit )  
18 Express Company, a Utah )  
19 Corporation; J.R. Simplot Company, )  
20 an Idaho Corporation; Terteling )  
21 Company, Inc., an Idaho )  
22 Corporation; and Union Pacific )  
23 Railroad Company, a Utah )  
24 Corporation, )

U.S. EPA DOCKET NO.  
10-96-0031 (CERCLA)

25 Respondents. )  
26 )

27 Proceeding Under Sections 106(a) )  
28 of the )  
Comprehensive Environmental )  
Response, Compensation, and )  
Liability Act of 1980, as amended, )  
42 U.S.C. § 9606(a). )

21 I. INTRODUCTION AND JURISDICTION  
22

23 1. This First Supplement to Administrative Order for  
24 Remedial Action (Supplement) modifies the Administrative Order on  
25 Remedial Action (Order) initially issued on July 12, 1996 to Pacific  
26 Hide and Fur Depot, Inc., a Montana Corporation, dba Pacific Steel &  
27 Recycling Company; McCarty's, Inc., an Idaho Corporation; Lucent

28 FIRST SUPPLEMENT TO  
ADMINISTRATIVE ORDER FOR REMEDIAL ACTION

1 Technologies, a Delaware Corporation; ANR Freight System, Inc., a  
2 Delaware Corporation; FMC, a Delaware Corporation; Monsanto Company,  
3 a Delaware Corporation; Pacific Fruit Express Company, a Utah  
4 Corporation; J.R. Simplot Company, an Idaho Corporation; Terteling  
5 Company, Inc., an Idaho Corporation; and Union Pacific Railroad  
6 Company, a Utah Corporation, directing that each of the listed parties  
7 implement the remedial design by performing the remedial action for  
8 the remedy described in the Final Operable Unit Record of Decision  
9 (ROD), dated September 27, 1995.

10           2.     Subsequent to issuance of the Order, Pacific Hide & Fur  
11 Depot, Inc., McCarty's, Inc., and Union Pacific Railroad Company  
12 (Respondents) notified EPA of their collective intent to comply with  
13 the terms of the Order. Respondents proceeded to implement the  
14 remedial action for the remedy described in the ROD.

15           3.     The ROD required the remediation of all lead (Pb)  
16 contaminated soils above an industrial land use scenario cleanup level  
17 of 1,000 mg/kg. During implementation of the remedial action required  
18 by the Order, Respondents proposed removing additional contaminated  
19 soils to levels at or below the more stringent residential land use  
20 scenario cleanup level of 400 mg/kg. The additional remedial work  
21 proposed and subsequently undertaken by Respondents would reduce the  
22 risks to human health and the environment.

23           4.     The additional remedial work proposed by Respondents  
24 represents a significant change to the selected remedy as described  
25 in the ROD. EPA has issued an "Explanation of Significant Differences  
26 (ESD) memorializing the additional remedial work proposed and  
27

28 FIRST SUPPLEMENT TO  
ADMINISTRATIVE ORDER FOR REMEDIAL ACTION

1 undertaken by Respondents. The ESD, as required by Section 117(c) of  
2 the Comprehensive Environmental Response, Compensation, and Liability  
3 Act of 1980, as amended (CERCLA), 42 U.S.C. § 9617(c), and the  
4 National Contingency Plan (NCP), 40 C.F.R. § 300.435(c)(2)(1),  
5 documents that Respondents removed lead-contaminated soil to levels  
6 at or below the more stringent residential land use scenario cleanup  
7 level of 400 mg/kg.

8 5. This Supplement to the Order is issued under the  
9 authority vested in the President of the United States by Sections  
10 104, 122(a), and 122(d)(3) of CERCLA, 42 U.S.C. §§ 9604, 9622(a), and  
11 9622(d)(3). This authority was delegated to the Administrator of EPA  
12 on January 23, 1987, by Executive Order 12580 (52 Fed. Reg. 2926,  
13 January 29, 1987), and was further delegated to EPA Regional  
14 Administrators on September 13, 1987, by EPA Delegation No. 14-14-C.  
15 Under Regional Order Number R10 1290.3, this authority was further  
16 delegated to the Environmental Cleanup Office Director for EPA, Region  
17 10.

## 18 II. SUPPLEMENTATION OF PRIOR ORDER

19 6. The intent of this Supplement is to modify the scope  
20 of paragraph 25 of the July 12, 1996 Order to read as follows:

21 Based on the foregoing, Respondents are hereby ordered to  
22 comply with all provisions of this Order, including, but  
23 not limited to, implementing all actions and performing in  
24 accordance with the requirements of the (a) ROD, as  
25 modified by the ESD; (b) SOW; (c) attachments to this  
26 Order; (d) documents incorporated by reference into this  
27

28 FIRST SUPPLEMENT TO  
ADMINISTRATIVE ORDER FOR REMEDIAL ACTION

1 Order; (e) the Remedial Design documents; and (f) schedules  
2 and deadlines in this Order, attached to this Order, or  
3 incorporated by reference into this Order.

4 All remaining terms and conditions of the July 12, 1996 Order remain  
5 in effect.

6  
7 III. EFFECTIVE DATE AND SUBSEQUENT MODIFICATION

8 7. This Supplement shall be effective on the date it is  
9 signed by the EPA.

10  
11 BY: Randall F. Smith  
12 RANDALL F. SMITH, Director  
13 Office of Environmental Cleanup  
14 U.S. Environmental Protection Agency  
15  
16  
17  
18  
19  
20  
21  
22  
23  
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25  
26  
27

DATE: April 20, 1998

Order; (e) the Remedial Design documents; and (f) schedules and deadlines in this Order, attached to this Order, or incorporated by reference into this Order.

All remaining terms and conditions of the July 12, 1996 Order remain in effect.

III. EFFECTIVE DATE AND SUBSEQUENT MODIFICATION

7. This Supplement shall be effective on the date it is signed by the EPA.

BY: \_\_\_\_\_ DATE: \_\_\_\_\_  
RANDALL F. SMITH, Director  
Office of Environmental Cleanup  
U.S. Environmental Protection Agency

NAME	Thompson	Williamson	Gearheard	Oesterle	Kowalski	
DATE	8/15/98	6/15		QAD	2/1	
INITIAL	h/s	4/20/98		4-16-98	4/16/98	

FIRST SUPPLEMENT TO  
ADMINISTRATIVE ORDER FOR REMEDIAL ACTION

**ADDENDUM #1**  
to  
**EXPLANATION OF SIGNIFICANT DIFFERENCES (ESD)**  
for the  
**PACIFIC HIDE & FUR RECYCLING CO. SUPERFUND SITE**  
**POCATELLO, IDAHO**

From the September 27, 1995,  
Final Operable Unit Record of Decision

**PURPOSE**

The purpose of this Addendum #1 (Addendum) to the Explanation of Significant Differences (ESD) for the Pacific Hide and Fur Recycling Co., Superfund site is to further describe the location of the Restricted Area within the site boundary.

**BACKGROUND**

The ESD was signed by EPA on April 20, 1998, and contains the description of a Restricted Area. The Restricted Area was defined in general terms in the ESD and has been subsequently surveyed. A legal description of the Restricted Area, identified as Parcel "C," is being added to the ESD to provide a precise boundary for the Restricted Area. A copy of the Survey Plat is also attached to this Addendum.



## LEGAL DESCRIPTION OF RESTRICTED AREA

Restricted Area, also known as, Parcel "C"

A parcel of land located in the SW 1/4 of the SE 1/4 of Section 16, T 6 S, R 34 E, B.M., Bannock County, Idaho, more particularly described as follows:

Commencing at the South 1/4 corner of said Section 16, said corner being marked by an 8-inch diameter iron fence post as described in Corner Perpetuation and Filing Record, Instrument #782026;  
thence N 0°08'07"E, along the meridional centerline of Section 16, 1202.68 feet to a point on the Southerly line of Quit Claim deed instrument #93009586;  
thence S 56°30'28" E, along said Southerly line, 762.21 feet to a found 1/2-inch diameter rebar with a red plastic cap stamped "Jacobsen LS 4430";  
thence N 37°50'14" W, 143.61 feet to a set 1/2-inch diameter rebar with a red plastic cap stamped "PLS 8075", said rebar marking the true point of beginning;  
thence the following eight courses, the end point of each course being marked by a set 1/2-inch diameter rebar with a red plastic cap stamped "PLS 8075";  
N 61°38'00" W, 151.63 feet;  
thence N 30°14'39" E, 49.66 feet;  
thence N 86°45'12" E, 46.84 feet;  
thence N 53°35'14" E, 36.62 feet;  
thence N 14°32'40" E, 90.26 feet;  
thence N 27°43'16" W, 46.56 feet;  
thence N 35°33'00" E, 24.14 feet;  
thence S 62°19'00" E, 154.93 feet;  
thence S 29°06'56" W, 246.76 feet to the true point of beginning.

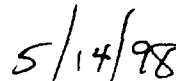
Said parcel containing 0.71 acres, more or less.

## ADDENDUM EFFECTIVE DATE

This Addendum shall be effective on the date it is signed by EPA.



Randall F. Smith, Director  
Office of Environmental Cleanup  
U.S. Environmental Protection Agency



Date

## NOTES

City of Pocatello grid bearing of S 31°19'48" W between the found brass disc monuments set in concrete marking Irrigation Stations "TODD" and "PROLIMA" as per grid coordinates obtained from the City of Pocatello survey office. This baseline bearing is equivalent to a grid bearing of S 00°08'07" W between the calculated position for the Center H corner and the found #1 disc fence post marking the South W corner of Section 18.

## 1. REFERENCE DOCUMENTS

- Dood Instrument numbers recorded in the Bonnach Copyist Recorder's office: 82554, 82557, 82556, 271191, 315375, 548664, 353796, 631152, 832645, 815370, 90007197 & 93009584.
- Record of Survey by McCarthy's Inc. by Bailey & Blaby, Engineers-Surveyors, Inc. #815190 (P-18)
- Record of survey for Great Western Mailing by Richard Green, Inc. #789042 (P-10)
- Record of Survey by McCarthy's Inc. by Shurtliff Engineering, Inc. #894332 (P-20)
- Record of Survey by Blithell Eng. Inc. #86008935
- Record of Survey by Blithell Eng. Inc. #87004823
- Department of Transportation Right-of-Way maps
- UPRR R/W maps on file in the Peacelife Engineer's office
2. All bearings and distances are measured unless otherwise noted.
3. The Highway right-of-way monument used on the Bailey-Blaby survey to determine the westerly end of the right-of-way of U.S. 30 has been disturbed. This R.O.W. monument is shown on A-8-Built plans of May 30 of the IOT office, but no station is given. It is assumed that the monument was undisturbed at the time of Blaby's survey and that monuments set during this survey were placed on the right-of-way. Accordingly, I accept the found monuments as shown.
4. This survey was performed in order to delineate the boundaries of a parcel of land to which U.S. E.P.A. deed restrictions will apply.

COUNTY RECORDER

Instrument No. \_\_\_\_\_ Time \_\_\_\_\_ Date \_\_\_\_\_

Book \_\_\_\_\_ Page \_\_\_\_\_ Fee \_\_\_\_\_

**County Recorder**

Record of Survey prepared at the request of Pacific Recycling,  
located in the SW 1/4 Sec. 16, T 6 S, R 34 E, B.M.

JOB No. 98-033	DATE 10/15/98	DWG. No. 190
BY 10/15/98	DATE 10/15/98	
BY 10/15/98	DATE 10/15/98	

**A & E ENGINEERING INC.**

P O BOX 1327  
POCAHELLO, IDAHO 83204

1949 1950 1951 1952 1953 1954 1955 1956 1957 1958 1959 1960 1961 1962 1963 1964 1965 1966 1967 1968 1969 1970 1971 1972 1973 1974 1975 1976 1977 1978 1979 1980 1981 1982 1983 1984 1985 1986 1987 1988 1989 1990 1991 1992 1993 1994 1995 1996 1997 1998 1999 2000 2001 2002 2003 2004 2005 2006 2007 2008 2009 2010 2011 2012 2013 2014 2015 2016 2017 2018 2019 2020 2021 2022 2023 2024 2025 2026 2027 2028 2029 2030 2031 2032 2033 2034 2035 2036 2037 2038 2039 2040 2041 2042 2043 2044 2045 2046 2047 2048 2049 2050 2051 2052 2053 2054 2055 2056 2057 2058 2059 2060 2061 2062 2063 2064 2065 2066 2067 2068 2069 2070 2071 2072 2073 2074 2075 2076 2077 2078 2079 2080 2081 2082 2083 2084 2085 2086 2087 2088 2089 2090 2091 2092 2093 2094 2095 2096 2097 2098 2099 2100 2101 2102 2103 2104 2105 2106 2107 2108 2109 2110 2111 2112 2113 2114 2115 2116 2117 2118 2119 2120 2121 2122 2123 2124 2125 2126 2127 2128 2129 2130 2131 2132 2133 2134 2135 2136 2137 2138 2139 2140 2141 2142 2143 2144 2145 2146 2147 2148 2149 2150 2151 2152 2153 2154 2155 2156 2157 2158 2159 2160 2161 2162 2163 2164 2165 2166 2167 2168 2169 2170 2171 2172 2173 2174 2175 2176 2177 2178 2179 2180 2181 2182 2183 2184 2185 2186 2187 2188 2189 2190 2191 2192 2193 2194 2195 2196 2197 2198 2199 2200 2201 2202 2203 2204 2205 2206 2207 2208 2209 2210 2211 2212 2213 2214 2215 2216 2217 2218 2219 2220 2221 2222 2223 2224 2225 2226 2227 2228 2229 2230 2231 2232 2233 2234 2235 2236 2237 2238 2239 2240 2241 2242 2243 2244 2245 2246 2247 2248 2249 2250 2251 2252 2253 2254 2255 2256 2257 2258 2259 2260 2261 2262 2263 2264 2265 2266 2267 2268 2269 2270 2271 2272 2273 2274 2275 2276 2277 2278 2279 2280 2281 2282 2283 2284 2285 2286 2287 2288 2289 2290 2291 2292 2293 2294 2295 2296 2297 2298 2299 2300 2301 2302 2303 2304 2305 2306 2307 2308 2309 2310 2311 2312 2313 2314 2315 2316 2317 2318 2319 2320 2321 2322 2323 2324 2325 2326 2327 2328 2329 2330 2331 2332 2333 2334 2335 2336 2337 2338 2339 2340 2341 2342 2343 2344 2345 2346 2347 2348 2349 2350 2351 2352 2353 2354 2355 2356 2357 2358 2359 2360 2361 2362 2363 2364 2365 2366 2367 2368 2369 2370 2371 2372 2373 2374 2375 2376 2377 2378 2379 2380 2381 2382 2383 2384 2385 2386 2387 2388 2389 2390 2391 2392 2393 2394 2395 2396 2397 2398 2399 2400 2401 2402 2403 2404 2405 2406 2407 2408 2409 2410 2411 2412 2413 2414 2415 2416 2417 2418 2419 2420 2421 2422 2423 2424 2425 2426 2427 2428 2429 2430 2431 2432 2433 2434 2435 2436 2437 2438 2439 2440 2441 2442 2443 2444 2445 2446 2447 2448 2449 2450 2451 2452 2453 2454 2455 2456 2457 2458 2459 2460 2461 2462 2463 2464 2465 2466 2467 2468 2469 2470 2471 2472 2473 2474 2475 2476 2477 2478 2479 2480 2481 2482 2483 2484 2485 2486 2487 2488 2489 2490 2491 2492 2493 2494 2495 2496 2497 2498 2499 2500 2501 2502 2503 2504 2505 2506 2507 2508 2509 2510 2511 2512 2513 2514 2515 2516 2517 2518 2519 2520 2521 2522 2523 2524 2525 2526 2527 2528 2529 2530 2531 2532 2533 2534 2535 2536 2537 2538 2539 2540 2541 2542 2543 2544 2545 2546 2547 2548 2549 2550 2551 2552 2553 2554 2555 2556 2557 2558 2559 2560 2561 2562 2563 2564 2565 2566 2567 2568 2569 2570 2571 2572 2573 2574 2575 2576 2577 2578 2579 2580 2581 2582 2583 2584 2585 2586 2587 2588 2589 2590 2591 2592 2593 2594 2595 2596 2597 2598 2599 2600 2601 2602 2603 2604 2605 2606 2607 2608 2609 2610 2611 2612 2613 2614 2615 2616 2617 2618 2619 2620 2621 2622 2623 2624 2625 2626 2627 2628 2629 2630 2631 2632 2633 2634 2635 2636 2637 2638 2639 2640 2641 2642 2643 2644 2645 2646 2647 2648 2649 2650 2651 2652 2653 2654 2655 2656 2657 2658 2659 2660 2661 2662 2663 2664 2665 2666 2667 2668 2669 2670 2671 2672 2673 2674 2675 2676 2677 2678 2679 2680 2681 2682 2683 2684 2685 2686 2687 2688 2689 2690 2691 2692 2693 2694 2695 2696 2697 2698 2699 2700 2701 2702 2703 2704 2705 2706 2707 2708 2709 2710 2711 2712 2713 2714 2715 2716 2717 2718 2719 2720 2721 2722 2723 2724 2725 2726 2727 2728 2729 2730 2731 2732 2733 2734 2735 2736 2737 2738 2739 2740 2741 2742 2743 2744 2745 2746 2747 2748 2749 2750 2751 2752 2753 2754 2755 2756 2757 2758 2759 2760 2761 2762 2763 2764 2765 2766 2767

TANGENT	DIRECTION	DISTANCE
11	N 05 14 39 E	48.64
12	N 08 45 19 E	48.84
13	N 11 36 19 E	48.92
14	N 14 32 40 E	49.00
15	N 17 44 16 W	49.08
16	N 19 11 00 E	49.14

### LEGEND

- Found State of Idaho, Department of Public Works brass cap in concrete Right-of-Way monument
- Found Bonanza County brass cap monument
- ① Found M's ruler with a red plastic cap stamped "Jacobson LS 4630"
- Found M's ruler with yellow plastic cap stamped "LS 771"
- Found M's ruler with yellow plastic cap stamped "LS 977"
- ① Found M's ruler, no markings, bent, presumed set by Vic Buley during trial #631590
- ④ Found M's ruler with red plastic cap stamped "MS 8075"
- Set M's ruler with red plastic cap stamped "PLS NU75"
- Found 8' iron fence post
- △ Calculated position, nothing set
- Existing fence lines, various types
- Boundary lines surveyed for U.S. E.P.A. David Hestrichs
- Warrenty deed lines
- (H ) Hazard bearing/distance from reference documents listed in note 1

### SURVEYOR'S CERTIFICATE

I, Michael L. Dowell, M/S 8073 Idaho, hereby certify that this plot correctly represents a survey made by me in conformance with law(s), Chapter 19, Title 33, Idaho Code, at the request of Pacific Recycling.

