

ARM Group LLC

Engineers and Scientists

September 10, 2020

Ms. Barbara Brown Project Coordinator Maryland Department of the Environment 1800 Washington Boulevard Baltimore, MD 21230

> Re: Response Action Completion Report: PCB-Impacted Material Excavation Area B: Parcel B4 Tradepoint Atlantic Sparrows Point, MD 21219

Dear Ms. Brown:

ARM Group LLC (ARM), on behalf of Tradepoint Atlantic (TPA), has prepared this Response Action Completion Report for the Maryland Department of the Environment (MDE) and the United States Environmental Protection Agency (USEPA) to document the implementation of a remedial excavation to remove material containing elevated concentrations of polychlorinated biphenyls (PCBs) on a portion of the TPA property that is designated as Area B: Parcel B4 (the Site), which is shown on **Figure 1**. This Response Action Completion Report summarizes the excavation activities, confirmation sample results, excavated material handling and disposal, and backfilling.

Project Background

During the Phase II Investigation of Parcel B4, an elevated concentration of total PCBs was identified in the shallow soil sample collected from location B4-037-SB. Total PCBs were detected at 123.7 mg/kg, exceeding the Toxic Substances Control Act (TSCA) threshold of 50 mg/kg. Following this detection, a delineation investigation was completed surrounding B4-037-SB to define the horizontal and vertical limits of PCB impacts exceeding the 50 mg/kg threshold.

Following approval by the agencies, PCB delineation activities began on October 12, 2016. An initial delineation grid was established surrounding B4-037-SB with 25-foot grid spacing. Areas of concrete in the vicinity of the proposed locations were inspected for evidence of staining, and if possible, concrete samples were collected as concrete chips from within the 0 to 0.5 foot below ground surface (bgs) interval. At each delineation boring location, soil samples were collected from 1-foot intervals to depths of up to 5 feet bgs. Surface (0 to 1 foot bgs) and intermediate (4

to 5 feet bgs) soil samples were analyzed first, and the remaining intermediate sample intervals from 1 to 2, 2 to 3, and 3 to 4 feet bgs were analyzed only if total PCBs exceeded 50 mg/kg in the preceding samples. Total PCBs exceeded 50 mg/kg at several delineation locations; therefore, additional borings were added to the delineation grid to improve its resolution. A total of 49 delineation borings were completed, and delineation activities were completed by December 13, 2016.

The complete findings from the delineation investigation, as well as the implementation protocols for the proposed remedial excavation, were presented within a Work Plan entitled Delineation Activities and Proposed Excavation of PCB Impacted Soil for Parcel B4 (dated March 22, 2017). The Work Plan proposed that any material exceeding 50 mg/kg of total PCBs would be removed. A subsequent Comment Response Letter was also submitted dated April 5, 2017. The Work Plan and Comment Response Letter for the proposed excavation were collectively approved by the MDE via email on April 6, 2017.

Response Action Implementation

Following the receipt of analytical data from the delineation investigation, three excavation areas were proposed in the approved Work Plan dated March 22, 2017. As presented on **Figure 2**, the proposed excavation areas were centered around delineation borings B4-037B-SB and B4-037Y-SB, and the initial Phase II Investigation location B4-037-SB. Materials excavated from each area were stockpiled and characterized for disposal separately.

All response actions were conducted in accordance with the property-wide Health and Safety Plan (HASP) developed by EnviroAnalytics Group, LLC (EAG). The excavation work was performed by Erosion Control and Landscape Services (ECLS), with field oversight performed by an ARM Environmental Professional (EP).

Excavation B4-037Y-SB

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The excavation centered around B4-037Y-SB was completed to a depth of 2 feet, and an area of approximately 350 square feet. The excavation was completed as specified in the Work Plan, and confirmation samples were collected on January 15, 2020. All confirmation samples were analyzed for PCBs by Pace Analytical Services, Inc. (PACE). The final excavation boundary was restricted slightly by a rail line running from north to south along the eastern boundary of the excavation. Due to the presence of the rail line, the excavation was backfilled immediately (see designated Backfilling section below). A total of nine confirmation samples (one bottom and eight sidewall) were collected, and none had PCB concentrations above the 50 mg/kg threshold. Results of the confirmation samples associated with this excavation are presented in **Table 1**. The analytical laboratory reports are included as electronic attachments. The final excavation is included as **Attachment 1**.

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Excavations B4-037-SB and B4-037B-SB

Six total rounds of excavation and confirmation sampling were performed on the B4-037-SB and B4-037B-SB excavation areas. All confirmation samples (from all rounds of excavation) were analyzed for PCBs by PACE. B4-037-SB and B4-037B-SB were initially proposed as separate excavation areas (as shown in **Figure 2**) but were expanded and ultimately combined in the field. During each excavation period, a mini-excavator and an excavator-mounted hydraulic hammer were used to remove soil and concrete pads. Each round of excavation at B4-037-SB and B4-037B-SB is described in further detail below.

The preliminary extents of the excavations required to remove the PCB contaminated soil, as presented in the Work Plan, were based on the prior delineation completed in December 2016. Numerous confirmation samples exceeded the 50 mg/kg TSCA threshold. The exceedances caused the excavation to expand, both in area and depth, from the originally proposed areas. The six iterations of remedial excavation and their corresponding confirmation samples are presented on **Figure 3**. Results of the confirmation samples throughout the excavation are presented in **Table 1**. The analytical laboratory reports are included as electronic attachments. The final excavation boundaries are shown on **Figure 4**. A photograph log of the implementation is included as **Attachment 1**.

Excavation Round 1

Excavation areas B4-037-SB and B4-037B-SB were initially completed to the areas and depths specified in the Work Plan. Sidewall and bottom confirmation samples were collected on January 15 and January 21, 2020. One sidewall confirmation sample was collected as concrete dust in accordance with the USEPA's concrete dust sample collection Standard Operating Procedure (SOP) dated May 2011. Six sidewall samples (B4-10, B4-11, B4-12, B4-13, B4-15, and B4-17) exceeded 50 mg/kg.

Excavation Round 2

Excavations continued following the receipt of analytical data showing sidewall confirmation samples exceeding the 50 mg/kg threshold. Sidewalls were expanded in each excavation area where exceedances had been recorded. Sidewall and bottom confirmation samples were then collected on February 11, 2020. Four sidewall samples (B4-2.2, B4-2.4, B4-2.5, and B4-2.6) exceeded 50 mg/kg.

Excavation Round 3

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Excavations continued following the receipt of analytical data showing sidewall confirmation samples exceeding the 50 mg/kg threshold. Sidewalls were expanded in each excavation area where exceedances had been recorded. Adjacent sidewalls on the B4-037-SB and B4-037B-SB

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excavations had exceeded the 50 mg/kg threshold, so the soil and concrete between the two areas were removed to create one single excavation area. Confirmation samples were then collected on March 13, 2020. Three sidewall samples (B4-EXC-1, B4-EXC-2, and B4-EXC-4) and one bottom sample (B4-EXC-5) exceeded 50 mg/kg.

Excavation Round 4

Excavations continued following the receipt of analytical data showing sidewall and bottom confirmation samples exceeding the 50 mg/kg threshold. Field PCB test kits manufactured by Dexsil with a detection limit of 50 mg/kg were obtained to better guide the excavations during subsequent rounds. Field kits provided a visual indicator of whether a sidewall or bottom area had a PCB concentration above or below 50 mg/kg. Prior to collecting sidewall and bottom samples for fixed laboratory analysis, a field kit sample was collected to help indicate that the sampled area did not exceed the 50 mg/kg threshold. The test kit results were used as a field aide and are not formally included in this Completion Report. Sidewall and bottom confirmation samples from the fourth round of excavating were collected on May 4, 2020. One sidewall sample (B4-EXC-W2) and one bottom sample (B4-EXC-B6) exceeded 50 mg/kg.

Excavation Round 5

Excavations continued following the receipt of analytical data showing sidewall and bottom samples exceeding the 50 mg/kg threshold. PCB field test kits were again used to guide the excavation. The main northern section (approximately 1,700 square feet) was excavated to an increased depth of 5 feet bgs. Sidewall and bottom confirmation samples from the fifth round of excavating were collected on May 29, 2020. One bottom sample (B4-EXC-B5) from the northwestern portion of the excavation exceeded 50 mg/kg.

Excavation Round 6

Excavations continued following the receipt of analytical data showing one bottom sample exceeding the 50 mg/kg threshold. The northwestern portion of the area was further excavated an additional 12 inches down to remove contaminated material. PCB field test kits were again used to guide the excavation. One bottom confirmation sample from the newly excavated portion was collected on June 24, 2020 for analysis. Confirmation sample B4-EXC-B1 was well below the 50 mg/kg threshold, and the excavation was deemed complete.

Excavated Material Handling and Disposal

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A total of approximately 380 cubic yards of potentially impacted material was removed. Each stockpile was characterized via a 10-part composite sample and analyzed by Caliber Analytical Services for PCBs and TCLP parameters (VOCs, SVOCs, and metals). Analytical data from the waste stockpiles were compared against the TCLP criteria and the TSCA threshold of 50 ppm for

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total PCBs. Stockpiled material below these thresholds was considered non-hazardous. Results of the waste characterization are presented in **Table 2**. The analytical laboratory reports from the waste characterization are included as electronic attachments.

Material from excavation area B4-037Y-SB was placed in covered stockpiles, sampled, determined to be non-hazardous, and disposed of on-site at Greys Landfill in February 2020. Material excavated from B4-037Y-SB corresponds to waste stockpiles B4 A, B4 B, and B4 C. Characterization results for these stockpiles are presented in **Table 2**.

Material from the B4-037-SB and B4-037B-SB excavation area(s) was stockpiled and covered throughout the various iterations of excavating. Although only two of the eight total stockpiles were determined to be hazardous based on the waste characterization sampling, the bulk of the excavated material was assumed to be hazardous based on the results of the field test kit and confirmation sampling. Material excavated from B4-037-SB and B4-037B-SB corresponds to waste stockpiles B4 D, B4 PCB Waste 1, B4 PCB Waste 2, B4 PCB Waste 3, and B4 PCB Waste 4. Hazardous material was disposed of off-site at a commercial landfill approved to accept TSCA regulated remediation waste. Waste manifests from the off-site material disposal are included as **Attachment 2**.

Backfilling

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Both excavation areas were backfilled by ECLS to the existing grade with clean fill aggregate (#57 stone sourced from Martin Marietta). Backfilling of B4-037Y-SB was conducted on January 15, 2020. Backfilling of the B4-037-SB and B4-037B-SB excavation was completed on July 27, 2020. In both excavation areas, the stone was placed in 6-inch lifts and compacted with a wheel-loader. Photographs of the completed backfilling are included in **Attachment 1**.

If you have any questions, or if we can provide any additional information at this time, please do not hesitate to contact ARM Group LLC at 410-290-7775.

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Respectfully Submitted, ARM Group LLC

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Ryan Clancy Staff Engineer

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Eric S. Magdar, P.G. Vice President

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FIGURES







Note: Locations are not survey accurate







Excavation Extent

Note: Locations are not survey accurate

ID	Area (ft ²)	Depth (ft)	Volume (yd ³)
1	328	2	24.3
2	1,198	5	222
3	303	1.5	16.8
4	540	6	120
	Bank Tota	383	





TABLES

Table 1 - Parcel B4 Summary of PCB Excavation Confirmation Samples

1/15	5/20 & 1/21/2	0		2/11/2020			3/13/2020			5/4/2020			5/29/2020			6/24/2020	
Sample ID	Excavation Area	Total PCB Concentration (mg/kg)															
B4-1	B4-037Y	14.1 J	B4-2.1	B4-037	32.7	B4-EXC-1	SW	4,020	B4-EXC-W1	SW	26.2	B4-EXC-S1	SW	17.5	B4-EXC-B1	SW	0.12 J
B4-2	B4-037Y	0.86 U	B4-2.2	B4-037	974 J	B4-EXC-2	SW	1,090	B4-EXC-W2	SW	59.6 J	B4-EXC-S2	SW	0.33			
B4-3	B4-037Y	0.91 U	B4-2.3	B4-037	11.2	B4-EXC-3	SW	41.1	B4-EXC-W3	SW	12.5	B4-EXC-S3	SW	0.19 U			
B4-4	B4-037Y	16.9 J	B4-2.4	B4-037	291	B4-EXC-4	SW	13,200 J	B4-EXC-W4	SW	0.84	B4-EXC-S4	SW	0.16 U			
B4-5	B4-037Y	1.5	B4-2.5	B4-037B	130	B4-EXC-5	SW	896	B4-EXC-B5	SW	22.5	B4-EXC-B5	SW	66.6 J			
B4-6	B4-037Y	6.9 J	B4-2.6	B4-037B	198				B4-EXC-B6	SW	4,930 J	B4-EXC-B6	SW	0.12 J			
B4-7	B4-037Y	7.3 J							B4-EXC-B7	SW	1.1	B4-EXC-B7	SW	3.1			
B4-8	B4-037Y	0.52 J							B4-EXC-B8	SW	9.6	B4-EXC-B8	SW	0.72			
B4-9	B4-037Y	14.7 J															
B4-10	B3-037	82.5															
B4-11	B3-037	58.1															
B4-12	B3-037	473															
B4-13	B3-037	124															
B4-14	B3-037	12.7															
B4-15	B4-037B	265															
B4-16	B4-037B	0.34															
B4-17	B4-037B	858 J															
B4-18^	B4-037B	8.4															
B4-19	B4-037B	38.2															

Detections in bold

Values in red indicate an exceedance of the 50 mg/kg threshold

^ Concrete Dust Sample

U: This analyte was not detected in the sample. The numeric value represents the sample quantitation/detection limit.

J: The positive result for this analyte is a quantitative estimate.

SW: Southwest excavation area encompassing B4-037 and B4-037B

Sample ID	<u>Parameter</u>	<u>Result</u> (mg/L)	<u>Laboratory</u> <u>Flag</u>	TCLP Limit (mg/L)	<u>TCLP</u> Exceedance	<u>Laboratory</u> LOQ (mg/L)
	1,1-Dichloroethene	0.011	U	0.7	no	0.011
	1,2-Dichloroethane (EDC)	0.011	U	0.5	no	0.011
	1,4-Dichlorobenzene	0.011	U	7.5	no	0.011
	2,4,5-Trichlorophenol	0.1	U	400	no	0.1
	2,4,6-Trichlorophenol	0.1	U	2	no	0.1
	2,4-Dinitrotoluene	0.1	U	0.13	no	0.1
	2-Butanone (MEK)	0.023	U	200	no	0.023
	2-Methylphenol	0.1	U	200	no	0.1
	3+4-Methylphenol	0.2	U	200	no	0.2
	Arsenic	0.5	U	5	no	0.5
	Barium	10	U	100	no	10
	Benzene	0.011	U	0.5	no	0.011
	Cadmium	0.1	U	1	no	0.1
	Carbon Tetrachloride	0.011	U	0.5	no	0.011
	Chlorobenzene	0.011	U	100	no	0.011
	Chloroform	0.011	U	6	no	0.011
	Chromium	0.5	U	5	no	0.5
	Hexachlorobenzene	0.1	U	0.13	no	0.1
D4 A Wests	Hexachlorobutadiene`	0.1	U	0.5	no	0.1
<u>B4 A waste</u> Exception Area	Hexachloroethane	0.1	U	3	no	0.1
BA 037V	Lead	0.5	U	5	no	0.5
(1/15/2020)	Mercury	0.02	U	0.2	no	0.02
(1/15/2020)	Nitrobenzene	0.1	U	2	no	0.1
	Pentachlorophenol	0.5	U	100	no	0.5
	Pyridine	0.1	U	5	no	0.1
	Selenium	0.1	U	1	no	0.1
	Silver	0.5	U	5	no	0.5
	Tetrachloroethene	0.011	U	0.7	no	0.011
	Trichloroethene	0.011	U	0.5	no	0.011
	Vinyl Chloride	0.011	U	0.2	no	0.011
	DCB Parameter	<u>Result</u>	Laboratory	TSCA Limit	<u>TSCA</u>	Laboratory_
	<u>I CD I atallieter</u>	(mg/kg)	<u>Flag</u>	<u>(mg/kg)</u>	Exceedance	LOQ (mg/kg)
	Aroclor 1016	4.9	U	50	no	4.9
	Aroclor 1221	4.9	U	50	no	4.9
	Aroclor 1232	4.9	U	50	no	4.9
	Aroclor 1242	4.9	U	50	no	4.9
	Aroclor 1248	4.9	U	50	no	4.9
	Aroclor 1254	4.9	U	50	no	4.9
	Aroclor 1260	4.9	U	50	no	4.9
	Aroclor 1262	17		50	no	4.9

Sample ID	<u>Parameter</u>	<u>Result</u> (mg/L)	<u>Laboratory</u> <u>Flag</u>	TCLP Limit (mg/L)	<u>TCLP</u> <u>Exceedance</u>	<u>Laboratory</u> LOQ (mg/L)
	1,1-Dichloroethene	0.011	U	0.7	no	0.011
	1,2-Dichloroethane (EDC)	0.011	U	0.5	no	0.011
	1,4-Dichlorobenzene	0.011	U	7.5	no	0.011
	2,4,5-Trichlorophenol	0.1	U	400	no	0.1
	2,4,6-Trichlorophenol	0.1	U	2	no	0.1
	2,4-Dinitrotoluene	0.1	U	0.13	no	0.1
	2-Butanone (MEK)	0.022	U	200	no	0.022
	2-Methylphenol	0.1	U	200	no	0.1
	3+4-Methylphenol	0.2	U	200	no	0.2
	Arsenic	0.5	U	5	no	0.5
	Barium	10	U	100	no	10
	Benzene	0.011	U	0.5	no	0.011
	Cadmium	0.1	U	1	no	0.1
	Carbon Tetrachloride	0.011	U	0.5	no	0.011
	Chlorobenzene	0.011	U	100	no	0.011
	Chloroform	0.011	U	6	no	0.011
	Chromium	0.5	U	5	no	0.5
	Hexachlorobenzene	0.1	U	0.13	no	0.1
DAD Weste	Hexachlorobutadiene`	0.1	U	0.5	no	0.1
<u>B4 B waste</u>	Hexachloroethane	0.1	U	3	no	0.1
Excavation Area	Lead	0.5	U	5	no	0.5
B4-03 / Y	Mercury	0.02	U	0.2	no	0.02
(1/15/2020)	Nitrobenzene	0.1	U	2	no	0.1
	Pentachlorophenol	0.5	U	100	no	0.5
	Pyridine	0.1	U	5	no	0.1
	Selenium	0.1	U	1	no	0.1
	Silver	0.5	U	5	no	0.5
	Tetrachloroethene	0.011	U	0.7	no	0.011
	Trichloroethene	0.011	U	0.5	no	0.011
	Vinyl Chloride	0.011	U	0.2	no	0.011
	DCD Deverse stor	Result	Laboratory	TSCA Limit	TSCA	Laboratory
	<u>PCB Parameter</u>	(mg/kg)	<u>Flag</u>	<u>(mg/kg)</u>	Exceedance	LOQ (mg/kg)
	Aroclor 1016	4.5	U	50	no	4.5
	Aroclor 1221	4.5	U	50	no	4.5
	Aroclor 1232	4.5	U	50	no	4.5
	Aroclor 1242	4.5	U	50	no	4.5
	Aroclor 1248	4.5	U	50	no	4.5
	Aroclor 1254	4.5	U	50	no	4.5
	Aroclor 1260	4.5	U	50	no	4.5
	Aroclor 1262	27		50	no	4.5

Sample ID	<u>Parameter</u>	<u>Result</u> (mg/L)	<u>Laboratory</u> <u>Flag</u>	TCLP Limit (mg/L)	<u>TCLP</u> Exceedance	<u>Laboratory</u> LOQ (mg/L)	
	1,1-Dichloroethene	0.016	U	0.7	no	0.016	
	1,2-Dichloroethane (EDC)	0.016	U	0.5	no	0.016	
	1,4-Dichlorobenzene	0.016	U	7.5	no	0.016	
	2,4,5-Trichlorophenol	0.1	U	400	no	0.1	
	2,4,6-Trichlorophenol	0.1	U	2	no	0.1	
	2,4-Dinitrotoluene	0.1	U	0.13	no	0.1	
	2-Butanone (MEK)	0.031	U	200	no	0.031	
	2-Methylphenol	0.1	U	200	no	0.1	
	3+4-Methylphenol	0.2	U	200	no	0.2	
	Arsenic	0.5	U	5	no	0.5	
	Barium	10	U	100	no	10	
	Benzene	0.016	U	0.5	no	0.016	
	Cadmium	0.1	U	1	no	0.1	
	Carbon Tetrachloride	0.016	U	0.5	no	0.016	
	Chlorobenzene	0.016	U	100	no	0.016	
	Chloroform	0.016	U	6	no	0.016	
	Chromium	0.5	U	5	no	0.5	
	Hexachlorobenzene	0.1	U	0.13	no	0.1	
D4 C Weste	Hexachlorobutadiene`	0.1	U	0.5	no	0.1	
<u>B4 C waste</u>	Hexachloroethane	0.1	U	3	no	0.1	
Excavation Area	Lead	0.5	U	5	no	0.5	
B4-03/Y	Mercury	0.02	U	0.2	no	0.02	
(1/13/2020)	Nitrobenzene	0.1	U	2	no	0.1	
	Pentachlorophenol	0.5	U	100	no	0.5	
	Pyridine	0.1	U	5	no	0.1	
	Selenium	0.1	U	1	no	0.1	
	Silver	0.5	U	5	no	0.5	
	Tetrachloroethene	0.016	U	0.7	no	0.016	
	Trichloroethene	0.016	U	0.5	no	0.016	
	Vinyl Chloride	0.016	U	0.2	no	0.016	
	DCD Barrow stor	Result	Laboratory	TSCA Limit	<u>TSCA</u>	Laboratory_	
	<u>FCB Farameter</u>	(mg/kg)	<u>Flag</u>	<u>(mg/kg)</u>	Exceedance	LOQ (mg/kg)	
	Aroclor 1016	4.9	U	50	no	4.9	
	Aroclor 1221	4.9	U	50	no	4.9	
	Aroclor 1232	4.9	U	50	no	4.9	
	Aroclor 1242	4.9	U	50	no	4.9	
	Aroclor 1248	4.9	U	50	no	4.9	
	Aroclor 1254	4.9	U	50	no	4.9	
	Aroclor 1260	4.9	U	50	no	4.9	
	Aroclor 1262	19		50	no	4.9	

Sample ID	<u>Parameter</u>	<u>Result</u> (mg/L)	<u>Laboratory</u> <u>Flag</u>	TCLP Limit (mg/L)	<u>TCLP</u> Exceedance	<u>Laboratory</u> LOQ (mg/L)
	1,1-Dichloroethene	0.02	U	0.7	no	0.02
	1,2-Dichloroethane (EDC)	0.02	U	0.5	no	0.02
	1,4-Dichlorobenzene	0.02	U	7.5	no	0.02
	2,4,5-Trichlorophenol	0.1	U	400	no	0.1
	2,4,6-Trichlorophenol	0.1	U	2	no	0.1
	2,4-Dinitrotoluene	0.1	U	0.13	no	0.1
	2-Butanone (MEK)	0.041	U	200	no	0.041
	2-Methylphenol	0.1	U	200	no	0.1
	3+4-Methylphenol	0.2	U	200	no	0.2
	Arsenic	0.5	U	5	no	0.5
	Barium	10	U	100	no	10
	Benzene	0.02	U	0.5	no	0.02
	Cadmium	0.1	U	1	no	0.1
	Carbon Tetrachloride	0.02	U	0.5	no	0.02
	Chlorobenzene	0.02	U	100	no	0.02
	Chloroform	0.02	U	6	no	0.02
	Chromium	0.5	U	5	no	0.5
	Hexachlorobenzene	0.1	U	0.13	no	0.1
B4 D Waste	Hexachlorobutadiene`	0.1	U	0.5	no	0.1
Excavation Area	Hexachloroethane	0.1	U	3	no	0.1
B4-037/037B	Lead	0.5	U	5	no	0.5
(1/21/2020)	Mercury	0.02	U	0.2	no	0.02
	Nitrobenzene	0.1	U	2	no	0.1
	Pentachlorophenol	0.5	U	100	no	0.5
	Pyridine	0.1	U	5	no	0.1
	Selenium	0.1	U	1	no	0.1
	Silver	0.5	U	5	no	0.5
	Tetrachloroethene	0.02	U	0.7	no	0.02
	Trichloroethene	0.02	U	0.5	no	0.02
	Vinyl Chloride	0.02	U	0.2	no	0.02
	DCB Parameter	Result	Laboratory	TSCA Limit	<u>TSCA</u>	Laboratory
	<u>ICBT arameter</u>	(mg/kg)	<u>Flag</u>	<u>(mg/kg)</u>	Exceedance	LOQ (mg/kg)
	Aroclor 1016	10	U	50	no	10
	Aroclor 1221	10	U	50	no	10
	Aroclor 1232	10	U	50	no	10
	Aroclor 1242	10	U	50	no	10
	Aroclor 1248	10	U	50	no	10
	Aroclor 1254	130		50	yes	10
	Aroclor 1260	10	U	50	no	10

Sample ID	<u>Parameter</u>	<u>Result</u> (mg/L)	<u>Laboratory</u> <u>Flag</u>	TCLP Limit (mg/L)	<u>TCLP</u> Exceedance	<u>Laboratory</u> LOQ (mg/L)	
	1,1-Dichloroethene	0.018	U	0.7	no	0.018	
	1,2-Dichloroethane (EDC)	0.018	U	0.5	no	0.018	
	1,4-Dichlorobenzene	0.018	U	7.5	no	0.018	
	2,4,5-Trichlorophenol	0.1	U	400	no	0.1	
	2,4,6-Trichlorophenol	0.1	U	2	no	0.1	
	2,4-Dinitrotoluene	0.1	U	0.13	no	0.1	
	2-Butanone (MEK)	0.036	U	200	no	0.036	
	2-Methylphenol	0.1	U	200	no	0.1	
	3+4-Methylphenol	0.2	U	200	no	0.2	
	Arsenic	0.5	U	5	no	0.5	
	Barium	10	U	100	no	10	
	Benzene	0.018	U	0.5	no	0.018	
	Cadmium	0.1	U	1	no	0.1	
	Carbon Tetrachloride	0.018	U	0.5	no	0.018	
	Chlorobenzene	0.018	U	100	no	0.018	
	Chloroform	0.018	U	6	no	0.018	
	Chromium	0.5	U	5	no	0.5	
	Hexachlorobenzene	0.1	U	0.13	no	0.1	
	Hexachlorobutadiene`	0.1	U	0.5	no	0.1	
B4 PCB Waste 1	Hexachloroethane	0.1	U	3	no	0.1	
Excavation Area	Lead	0.5	U	5	no	0.5	
B4-037/037B	Mercury	0.02	U	0.2	no	0.02	
(6/3/2020)	Nitrobenzene	0.1	U	2	no	0.1	
	Pentachlorophenol	0.5	U	100	no	0.5	
	Pyridine	0.1	U	5	no	0.1	
	Selenium	0.1	U	1	no	0.1	
	Silver	0.5	U	5	no	0.5	
	Tetrachloroethene	0.018	U	0.7	no	0.018	
	Trichloroethene	0.018	U	0.5	no	0.018	
	Vinyl Chloride	0.018	U	0.2	no	0.018	
	DCB Doromater	Result	Laboratory	TSCA Limit	<u>TSCA</u>	Laboratory	
	<u>I CB I araineter</u>	(mg/kg)	<u>Flag</u>	<u>(mg/kg)</u>	Exceedance	LOQ (mg/kg)	
	Aroclor 1016	0.067	U	50	no	0.067	
	Aroclor 1221	0.067	U	50	no	0.067	
	Aroclor 1232	0.067	U	50	no	0.067	
	Aroclor 1242	0.067	U	50	no	0.067	
	Aroclor 1248	0.067	U	50	no	0.067	
	Aroclor 1254	0.067	U	50	no	0.067	
	Aroclor 1260	0.067	U	50	no	0.067	
	Aroclor 1262	8.9		50	no	0.067	
	Aroclor 1268	0.067	U	50	no	0.067	

Sample ID	Parameter_	<u>Result</u> (mg/L)	<u>Laboratory</u> <u>Flag</u>	TCLP Limit (mg/L)	<u>TCLP</u> Exceedance	<u>Laboratory</u> LOQ (mg/L)	
	1,1-Dichloroethene	0.014	U	0.7	no	0.014	
	1,2-Dichloroethane (EDC)	0.014	U	0.5	no	0.014	
	1,4-Dichlorobenzene	0.014	U	7.5	no	0.014	
	2,4,5-Trichlorophenol	0.1	U	400	no	0.1	
	2,4,6-Trichlorophenol	0.1	U	2	no	0.1	
	2,4-Dinitrotoluene	0.1	U	0.13	no	0.1	
	2-Butanone (MEK)	0.029	U	200	no	0.029	
	2-Methylphenol	0.1	U	200	no	0.1	
	3+4-Methylphenol	0.2	U	200	no	0.2	
	Arsenic	0.5	U	5	no	0.5	
	Barium	10	U	100	no	10	
	Benzene	0.014	U	0.5	no	0.014	
	Cadmium	0.1	U	1	no	0.1	
	Carbon Tetrachloride	0.014	U	0.5	no	0.014	
	Chlorobenzene	0.014	U	100	no	0.014	
	Chloroform	0.014	U	6	no	0.014	
	Chromium	0.5	U	5	no	0.5	
	Hexachlorobenzene	0.1	U	0.13	no	0.1	
	Hexachlorobutadiene`	0.1	U	0.5	no	0.1	
B4 PCB Waste 2	Hexachloroethane	0.1	U	3	no	0.1	
Excavation Area	Lead	0.5	U	5	no	0.5	
B4-037/037B	Mercury	0.02	U	0.2	no	0.02	
(6/3/2020)	Nitrobenzene	0.1	U	2	no	0.1	
	Pentachlorophenol	0.5	U	100	no	0.5	
	Pyridine	0.1	U	5	no	0.1	
	Selenium	0.1	U	1	no	0.1	
	Silver	0.5	U	5	no	0.5	
	Tetrachloroethene	0.014	U	0.7	no	0.014	
	Trichloroethene	0.014	U	0.5	no	0.014	
	Vinyl Chloride	0.014	U	0.2	no	0.014	
	PCB Parameter	Result	Laboratory	TSCA Limit	<u>TSCA</u>	Laboratory_	
	<u>I CB I araineter</u>	(mg/kg)	<u>Flag</u>	<u>(mg/kg)</u>	Exceedance	LOQ (mg/kg)	
	Aroclor 1016	0.067	U	50	no	0.067	
	Aroclor 1221	0.067	U	50	no	0.067	
	Aroclor 1232	0.067	U	50	no	0.067	
	Aroclor 1242	0.067	U	50	no	0.067	
	Aroclor 1248	0.067	U	50	no	0.067	
	Aroclor 1254	0.067	U	50	no	0.067	
	Aroclor 1260	0.067	U	50	no	0.067	
	Aroclor 1262	6.2		50	no	0.067	
	Aroclor 1268	0.067	U	50	no	0.067	

Sample ID	<u>Parameter</u>	<u>Result</u> (mg/L)	<u>Laboratory</u> <u>Flag</u>	TCLP Limit (mg/L)	<u>TCLP</u> Exceedance	<u>Laboratory</u> LOQ (mg/L)
	1,1-Dichloroethene	0.014	U	0.7	no	0.014
	1.2-Dichloroethane (EDC)	0.014	U	0.5	no	0.014
	1,4-Dichlorobenzene	0.014	U	7.5	no	0.014
	2,4,5-Trichlorophenol	0.1	U	400	no	0.1
	2,4,6-Trichlorophenol	0.1	U	2	no	0.1
	2,4-Dinitrotoluene	0.1	U	0.13	no	0.1
	2-Butanone (MEK)	0.028	U	200	no	0.028
	2-Methylphenol	0.1	U	200	no	0.1
	3+4-Methylphenol	0.2	U	200	no	0.2
	Arsenic	0.5	U	5	no	0.5
	Barium	10	U	100	no	10
	Benzene	0.014	U	0.5	no	0.014
	Cadmium	0.1	U	1	no	0.1
	Carbon Tetrachloride	0.014	U	0.5	no	0.014
	Chlorobenzene	0.014	U	100	no	0.014
	Chloroform	0.014	U	6	no	0.014
	Chromium	0.5	U	5	no	0.5
	Hexachlorobenzene	0.1	U	0.13	no	0.1
	Hexachlorobutadiene`	0.1	U	0.5	no	0.1
B4 PCB Waste 3	Hexachloroethane	0.1	U	3	no	0.1
Excavation Area	Lead	0.5	U	5	no	0.5
B4-037/037B	Mercury	0.02	U	0.2	no	0.02
(6/3/2020)	Nitrobenzene	0.1	U	2	no	0.1
	Pentachlorophenol	0.5	U	100	no	0.5
	Pyridine	0.1	U	5	no	0.1
	Selenium	0.1	U	1	no	0.1
	Silver	0.5	U	5	no	0.5
	Tetrachloroethene	0.014	U	0.7	no	0.014
	Trichloroethene	0.014	U	0.5	no	0.014
	Vinyl Chloride	0.014	U	0.2	no	0.014
	DCP Deremeter	Result	Laboratory	TSCA Limit	<u>TSCA</u>	Laboratory_
	<u>FCB Parameter</u>	(mg/kg)	<u>Flag</u>	<u>(mg/kg)</u>	Exceedance	LOQ (mg/kg)
	Aroclor 1016	0.066	U	50	no	0.066
	Aroclor 1221	0.066	U	50	no	0.066
	Aroclor 1232	0.066	U	50	no	0.066
	Aroclor 1242	0.066	U	50	no	0.066
	Aroclor 1248	0.066	U	50	no	0.066
	Aroclor 1254	0.066	U	50	no	0.066
	Aroclor 1260	0.066	U	50	no	0.066
	Aroclor 1262	14		50	no	0.066
	Aroclor 1268	0.066	U	50	no	0.066

Table 2 - Parcel B4 Stockpile Waste Characterization Results

Sample ID	<u>Parameter</u>	<u>Result</u> (mg/L)	<u>Laboratory</u> <u>Flag</u>	TCLP Limit (mg/L)	<u>TCLP</u> Exceedance	<u>Laboratory</u> LOQ (mg/L)
	1.1-Dichloroethene	0.021	U	0.7	no	0.021
	1.2-Dichloroethane (EDC)	0.021	U	0.5	no	0.021
	1.4-Dichlorobenzene	0.021	U	7.5	no	0.021
	2,4,5-Trichlorophenol	0.1	U	400	no	0.1
	2,4,6-Trichlorophenol	0.1	U	2	no	0.1
	2,4-Dinitrotoluene	0.1	U	0.13	no	0.1
	2-Butanone (MEK)	0.042	U	200	no	0.042
	2-Methylphenol	0.1	U	200	no	0.1
	3+4-Methylphenol	0.2	U	200	no	0.2
	Arsenic	0.5	U	5	no	0.5
	Barium	10	U	100	no	10
	Benzene	0.021	U	0.5	no	0.021
	Cadmium	0.1	U	1	no	0.1
	Carbon Tetrachloride	0.021	U	0.5	no	0.021
	Chlorobenzene	0.021	U	100	no	0.021
	Chloroform	0.021	U	6	no	0.021
	Chromium	0.5	U	5	no	0.5
	Hexachlorobenzene	0.1	U	0.13	no	0.1
	Hexachlorobutadiene`	0.1	U	0.5	no	0.1
B4 PCB Waste 4	Hexachloroethane	0.1	U	3	no	0.1
Excavation Area	Lead	0.5	U	5	no	0.5
B4-037/037B	Mercury	0.02	U	0.2	no	0.02
(6/3/2020)	Nitrobenzene	0.1	U	2	no	0.1
	Pentachlorophenol	0.5	U	100	no	0.5
	Pyridine	0.1	U	5	no	0.1
	Selenium	0.1	U	1	no	0.1
	Silver	0.5	U	5	no	0.5
	Tetrachloroethene	0.021	U	0.7	no	0.021
	Trichloroethene	0.021	U	0.5	no	0.021
	Vinyl Chloride	0.021	U	0.2	no	0.021
	DCB Parameter	Result	Laboratory	TSCA Limit	<u>TSCA</u>	Laboratory
	<u>I CB I araineter</u>	(mg/kg)	<u>Flag</u>	<u>(mg/kg)</u>	Exceedance	LOQ (mg/kg)
	Aroclor 1016	6.5	U	50	no	6.5
	Aroclor 1221	6.5	U	50	no	6.5
	Aroclor 1232	6.5	U	50	no	6.5
	Aroclor 1242	6.5	U	50	no	6.5
	Aroclor 1248	6.5	U	50	no	6.5
	Aroclor 1254	6.5	U	50	no	6.5
	Aroclor 1260	6.5	U	50	no	6.5
	Aroclor 1262	180		50	yes	6.5
	Aroclor 1268	6.5	U	50	no	6.5

U: The analyte was not detected in the sample. The numeric value represents the sample LOQ.

TCLP: Toxicity Characteristic Leaching Procedure

TSCA: Toxic Substances Control Act

LOQ: Limit of Quantitation

Values in red indicate an exceedance of the TSCA threshold

ATTACHMENT 1



011720-1: B4-037Y excavation area was excavated to approximately 2 ft bgs. The excavation was located directly west of an active railroad line.



011720-2: B4-037 excavation area excavated to approximately 2 ft bgs.



011720-3: B4-037B excavation area excavated to approximately 1 ft bgs, where a concrete structure was revealed.



011720-4: Waste material stockpiled and covered after the first round of excavating.



030920-1: Expanded B4-037B excavation area. Various layers of concrete were observed throughout the excavation.



030920-2: Hydraulic hammer being used to remove the concrete area around the B4-037 excavation area.



030920-3: Connecting the B4-037 and B4-037B excavation areas by removing soil and concrete located between the two areas.



030920-4: Sub-surface material observed during the B4-037 and B4-037B excavation included concrete, slag, brick, and sand.



041620-1: The expanded excavation area, with a majority of the excavated area dug to approximately 3 ft bgs.



050520-1: The further expanded excavation area.



061820-1: Digging in the area of the final bottom sample exceedance. Soil below 4 feet bgs was lighter colored than the material above.



061820-2: Digging a portion of the excavation area to a depth of approximately 6 ft bgs. A majority of the excavation was dug to approximately 5 ft bgs, while the B4-037B area remained at approximately 1.5 ft bgs.



072420-1: Placing #57 stone fill in the deepest portion of the excavation.



072720-1: End dump placing #57 stone during backfilling. A 38-ton wheel loader was used to spread and compact the stone.



072420-3: B4-037Y excavation after completion of backfilling with #57 stone.



072720-4: Additional view of the backfilled B4-037Y excavation facing west.

ATTACHMENT 2

Ple	ase pri	nt or type.						Form	Approved.	OMB No.	2050-0039
1	UNIF W	ORM HAZARDOUS	1. Generator ID Number METED CED \$455 432	2. Page 1 of 1	3. Emergency Respons	se Phone	4. Manifest	Tracking Nu 057	474	5 J.	JK
11	5. Ge	nerator's Name and Mailin	g Address		Generator's Site Addres	s (if different t	nan mailing addres	ss)			
		Enviro Analytics	Group, LLC		Enviro Anal	viics Grou	a ilc				
		1600 Spamows F	Point Road. Ballimore, MD 21219		Sana						
	Gene	rator's Phone: 31	4-620-3056 Aitn: James Calenda								
11	6, Tra	nsporter 1 Company Nam	ė				U.S. EPA ID N	Number			
	7.7	US BONC (TRITIS)	port, inic					PAD 987	347 515	_	
	7. Ira	nsporter 2 Company Nam	e				U.S. EPAID N	Number			
	8. Des	signated Facility Name and	d Site Address				U.S. EPA ID N	Number			
		49350 N. 1-94 1	Service Dr., Belleville, MI 48113								S
			800-592-5489						090 633		
	Facilit	y's Phone:						10112 G 10			
	9a.	9b. U.S. DOT Description	on (including Proper Shipping Name, Hazard Class, ID Numbe	r,	10. Conta	ainers	11. Total	12. Unit	13.	Waste Code	s
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	14 Sr	ecial Handling Instruction	s and Additional Information								
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	15. 0	SENERATOR'S/OFFEROI	R'S CERTIFICATION: I hereby declare that the contents of the	is consignment a	re fully and accurately de	escribed above	e by the proper sh	ipping name	, and are clas	sified, packa	aged,
	E	xporter, I certify that the c	ontents of this consignment conform to the terms of the attach	ed EPA Acknowl	edgment of Consent.	uona governi	ientai regulationa,	il export sill	phient and h		ary
	Gener	ator's/Offeror's Printed/Tvo	mization statement identified in 40 CFR 262.27(a) (if I am a lai	rge quantity gene	erator) or (b) (iff am a sm nature	iall quantity ge	nerator) is true.	alter and	Mon	th Day	Vear
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	20. De:	signated Facility Owner or	Operator: Certification of receipt of hazardous materials cove	red by the manife	est except as noted in Ite	m 18a					
	Printed	/Typed Name		Sign	ature		_		Mon	th Day	Year
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EPA	Form	8700-22 (Rev. 12-17)	Previous editions are obsolete.					GENE	RATOR'S	S INITIAI	COPY

Plea	ase pr	int or type.						Form	Approved.	OMB No.	2050-0039
Î		FORM HAZARDOUS ASTE MANIFEST	1. Generator ID Number	3. Emergency Respo	onse Phone	4. Manifest	Tracking Nu	^{mber} 483	0 J.	JK	
	5, Ge	enerator's Name and Mailir	ng Address		Generator's Site Addr	ess (if different th	an mailing addres	ss)			
		Enviro Analytics	Group, LLC		Enviro An	alytics Group	D, LLC				
		1600 Spearane I	Point Noord, Bellincea, MD 21219		Same						
	Gene	erator's Phone:	14-820-3098 Altr. James Calenda								
	6. Tra	ansporter 1 Company Nam	ne				U.S. EPA ID I	Number			
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	8. Ue	signated Facility Name an	na Site Address Sett, 1960:				U.S. EPAID I	Number			
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	Facili	ty's Phone:						<u>т т</u>			
	9a.	9b. U.S. DOT Description and Packing Group (if a	ion (including Proper Shipping Name, Hazard Class, ID Number, anv))		10. Co	ntainers Type	11. Totał Quantity	12. Unit Wt Mol	13.	Waste Code	s
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	15.	GENERATOR'S/OFFERO	R'S CERTIFICATION: I hereby declare that the contents of this	s consignment :	are fully and accurately	y described above	e by the proper sh	ipping name.	, and are clas	ssified, pack	aged,
		marked and labeled/placar Exporter. I certify that the c	rded, and are in all respects in proper condition for transport acc contents of this consignment conform to the terms of the attache	cording to applic d EPA Acknow	able international and edgment of Consent.	national governm	ental regulations.	. If export ship	pment and I	am the Prima	агу
		I certify that the waste min	imization statement identified in 40 CFR 262.27(a) (if I am a larg	ge quantity gen	erator) or (b) (if I am a	small quantity ger	nerator) is true.				
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	20. D	esignated Facility Owner o	pr Operator: Certification of receipt of hazardous materials cover	red by the manif	est excent as noted in	Item 18a					_
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		certify that the waste mini	contents of this consignr imization statement ider	nent conform to the tified in 40 CFR 26	e terms of the attache 62.27(a) (if 1 am a larg	ed EPA Acknowle ge quantity gene	edgment of Co erator) or (b) (i	onsent. fl am a sma	II quantity gen	erator) is true.				
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	I certify that the waste mir	imization statement identified in 40 C	CFR 262.27(a) (if I am a la	arge quantity gene	erator) or (b) (ifI am a sm	all quantity ge	enerator) is true.				
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Bc.	Signature of Alternate Fac	lity (or Generator)							Mo	onth Day	Ye
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Generator's Name and Mailing Address Generator's Site Address (if different than mailing address) Enviro Analytics Group, LLC Enviro Analytics Group, LLC 1600 Sparrows Point Road Baltimore, MD 21219 terator's Phone: 314-620-3056			Jľ
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nerator's Phone: 314-620-3056 Attn: Jermas Calenda			
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9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, 10. Containers 11. Total 12. Unit	13.	Waste Code	es
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Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.			
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Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)			
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	1900 Sparrows P	Point Road. Baltimore, MD 21219			Same						
enei	ator's Phone:	4-620-3056 Altr: James Calonda							_	noñ	
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	E	invino Analytics Gro	oup, LLC		Enviro Anal	lytics Group, L	LC				
	1	800 Sparrows Poin	nt Road. Baltimone, MD 21219		Samo						
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5, Ge E 1 Gene	enerator's Name and Mailing Address Erwing Analytics Group, LLC 600 Sperrows Point Road. Baltimone, erator's Phone: 314-620-3059 Attn: James	MD 21219 Calende	G	enerator's Site Addres Enviro Analytic Same	is (if different t Group, L	han mailing addre: LC	ss)			
6. Tra	ansporter 1 Company Name					U.S. EPA ID	Number	07 515		
7. Tra	ansporter 2 Company Name					U.S. EPA ID N	Number	1 010		
8. De	esignated Facility Name and Site Address					U,S. EPA ID I	Number			~
.4 Facili	19350 N. 1-94 Service Dr., Belleville, Mi 800-592-548	48111				I MAT	0 048 09	0 633		
9a. HM	9b. U.S. DOT Description (including Proper Shippin and Packing Group (if any))	ng Name, Hazard Class, ID Number,		10. Cont	ainers Type	11. Total Quantity	12, Unit Wt./Vol.	13.	. Waste Cod	es
X	1. UN3432, Polychlorinated Biphonyl	s, Solid, 9, PGIt			זיכו	I ac	к	MX01	PCB1	
	2.									
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15.	Emergency responses: GENERATOR'S/OFFEROR'S CERTIFICATION: 1 he marked and labeled/placarded, and are in all respect	b c ereby declare that the contents of this o in proper condition for transport acco t conform to the terms of the attached	consignment ar rding to applica EPA Acknowle	e fully and accurately of ble international and na	escribed abovernational governme	ve by the proper sh mental regulations	hipping nam	I-SSCH ne, and are cla hipment and	assified, pac I am the Prin	kaged
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11	5. Ge	nerator's Name and Mailin	g Address			Generato	r's Site Address (if different lh	nan mailing addres	s)			
Н		Enviro Analytics Onu	up, LLC			Envin	o Analytics (Broup, Ll	C.				
	1 1	SUU Sparrows Poin	KHORIGE Alter Inners Colored	16	1	SRIT	3						
	Gene 6. Tra	ansporter 1 Company Name	e alaan iyyaa ayyaa kaleenka e	8					U.S. EPA ID N	lumber		_	
	U	S Bulk Transport, Ir	т. 1С.						PAG	997 34	17 515		
	7. Tra	ansporter 2 Company Name	e						U.S. EPA ID N	umber			
	8. De	signated Facility Name and	d Site Address C.						U.S. EPA ID N	lumber			
Ш		19350 N. 1-94 Servic	os Dr., Bolievillo, MI 48111										
11	Eacili	ive Phone:	800-592-5489						I MIC	048 09	0 633		
Ш	1 dom	9b. U.S. DOT Descriptio	on (including Proper Shipping Name, Hi	azard Class, ID Number,			10, Contain	ers	11. Total	12. Unit			
	HM	and Packing Group (if a	ny))				No.	Туре	Quantity	Wt,/Vol.	13.	Waste Code	IS
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Ш	15.	GENERATOR'S/OFFEROI marked and labeled/placard	R'S CERTIFICATION: I hereby declar ded, and are in all respects in proper c	e that the contents of this ondition for transport acc	s consignment ording to appli	are fully ar cable inter	nd accurately des national and natio	cnbed abov mal governn	e by the proper shi nental regulations.	pping nam If export sh	e, and are cla hipment and l	ssified, pack am the Prim	aged, ary
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	18c. 5	Signature of Alternate Facili	ity (or Generator)						1		M	onth Day	y Year
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ESI(19 H	azardous Waste Report Ma	anagement wethod Codes (i.e., codes	or nazardous waste trea	urnent, disposa	ii, and recy	roling systems)		4.				
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	20. D	esignated Facility Owner or	r Operator: Certification of receipt of ha	zardous materials cover	ed by the mani	fest excep	t as noted in Item	18a					
	Printe	ed/Typed Name			Sig	nature					Mo	nth Day	Year
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Ш	5. Ge	enerator's Name and Mailin	g Address		Generator's Site Addre	ss (if different t	han mailing addre	SS)							
П		Enviro Analy	Aics Group, LLC		Enviro	Analytics	Group, LLC								
Ш		1600 Sparre	wes Point Road. Baltimore, MD 21219		Same										
Ш	Gen	erator's Phone	314-620-3056 Alth: James Calanda	- I											
Ш	6. Tr	ansporter 1 Company Name	8				U.S. EPA ID	Number		_					
П		US Bulk Trai	neoort Inc.				1	PA	0 987 347	515					
Ш	7 Tr	ansporter 2 Company Nam	8				U.S. EPAID	Number							
Ш	7. 10	anoportor z ouriparij riam													
	8. De	esignated Facility Name and	1 Sile Address				U.S. EPA ID	Number							
Ш		49050 N. 1-8	34 Service Dr., Bellaville, MI 46111												
Ш			800-592-5489				1	ME	048 090	633					
Ш	Facil	ity's Phone:						1	-						
Ш	9a.	9b. U.S. DOT Descriptio	n (including Proper Shipping Name, Hazard Class, ID Number, المعالية)	X	10. Con	tainers	11. Total	12, Unit	13.1	Waste Code:	s				
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Ш		arantes Mo	ing requirises.					SUL	86 FW. <i>8</i> 7114-	OSIGIT					
Ш	15.	GENERATOR'S/OFFERO	R'S CERTIFICATION: I hereby declare that the contents of this	s consignment	are fully and accurately	described abov	e by the proper sl	hipping name	e, and are clas	sified, packa	aged,				
Ш	1.1	marked and labeled/placar	ded, and are in all respects in proper condition for transport acc	ording to applie	cable international and r	iational governi	mental regulations	. If export sh	ipment and I a	am the Prima	згу				
Ш		I certify that the waste mini	mization statement identified in 40 CFR 262.27(a) (if I am a large	ge quantity gen	erator) or (b) (if I am a s	mall quantity g	enerator) is true.								
Ш	Gene	ator's/Offeror's Printed/Typ	ped Name	Sig	nature At-		- mark		Mon	th Day	Year				
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ΙĂ	Facili	ity's Phone:					1								
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	20. D	esignated Facility Owner or	r Operator: Certification of receipt of hazardous materials cover	ed by the mani	test except as noted in I	tem 18a		_		all De	Vera				
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