

Weston Solutions, Inc.

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REMOVAL SUPPORT TEAM 3 EPA CONTRACT EP-S2-14-01

August 20, 2018

Mr. Terry Kish, On-Scene Coordinator U.S. Environmental Protection Agency, Region II Removal Action Branch 2890 Woodbridge Avenue Edison, NJ 08837

EPA CONTRACT No: EP-S2-14-01

TDD No: TO-0370-0064 DC No: RST3-05-D-0014

SUBJECT: REMOVAL ASSESSMENT REPORT

PIONEER METAL FINISHING SITE

FRANKLINVILLE, GLOUCESTER COUNTY, NEW JERSEY

Dear Mr. Kish,

Enclosed please find the Removal Assessment Report which summarizes the initial site investigation activities conducted as part of a Removal Action by the U.S. Environmental Agency (EPA) with the support of Weston Solutions, Inc., Removal Support Team 3 (RST 3) at the Pioneer Metal Finishing Site (the Site) located in Franklinville, Gloucester County, New Jersey. The site investigation activities was performed on July 24, 2018.

If you have any questions or comments, please contact me at (908) 565-2987.

Sincerely,

Weston Solutions, Inc.

Milal Bet

Michael Beuthe, CHMM RST 3 Site Project Manager

Enclosure

cc: TDD File: TO-0370-0064

REMOVAL ASSESSMENT REPORT

PIONEER METAL FINISHING SITE

Franklinville, Jefferson County, New York

SSID No.: A28J EPA ID No.: NJD002360188

DC No: RST3-05-D-0014 TDD No: TO-0370-0064 EPA Contract No: EP-S2-14-01

Prepared for:

U.S. Environmental Protection Agency Region II – Removal Action Branch 2890 Woodbridge Avenue Edison, New Jersey 08837

Prepared by:

Removal Support Team 3 Weston Solutions, Inc. Federal East Division Edison, New Jersey 08837

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1.0 Introduction

On July 24, 2018, the U.S. Environmental Protection Agency (EPA), Region II Removal Action Branch (RAB), with the support of Weston Solutions, Inc., Removal Support Team 3 (RST 3), conducted an initial site investigation as part of a Removal Assessment at the Pioneer Metal Finishing Site (the Site). Activities conducted during the site investigation included: air monitoring throughout the Pioneer Metal Finishing, Inc. facility (the Facility), sampling of select containers for field characterization testing, documentation of hazardous materials and container labels, and documentation of Site conditions. The objectives of this initial site investigation were to determine appropriate levels of personal protection equipment (PPE) required for subsequent and future entry into the Facility; verify the reported presence of hazardous substances in the Facility; and document the general conditions throughout the Site.

Site Location and Description

The Site is located at 2034 Coles Mill Road in Franklinville, Gloucester County, New Jersey, on three tax parcels (Block 1401, Lots 4, 5 and 6) which cover approximately 13 acres. The Facility and associated parking and storage areas are located on Lot 4 and on a small section of Lot 5, in the western portion of the Site. The approximately 18,000 square foot facility was previously used for plating operations, and is currently used for powder coating operations. The Facility consists of an office, a former laboratory, a storage area, a former blower exhaust room, the former plating and current powder coating operations room, a boiler room, a holding tank area, a settling and treatment tank area, and a former wastewater treatment room. The outside areas of the Facility include two storage trailers located immediately to the northeast of the Facility and an area of sand, gravel and sparse vegetation is located immediately to the east, southeast, south and southwest of the Facility. The remaining areas of the Site include, undeveloped deciduous forests and forested wetlands to the northeast and south of the Facility, and a distinct area of dead vegetation to the east and southeast of the Facility. The Site is bordered by Coles Mill Road to the north, undeveloped forested wetlands and Scotland Run to the east and southeast, undeveloped scrubshrub wetlands to the south, undeveloped deciduous forests and forested wetlands to the southwest, and undeveloped coniferous forests to the west.

Refer to Attachment A, Figure 1: Site Location Map and Figure 2: Site Layout Map.

Site History and Background

The Site is owned by Pioneer Metal Finishing Inc. (Pioneer). Pioneer formerly operated a plating operation on-site from 1956 to or around 2005. Plating operations conducted at the Site included chrome plating and copper nickel plating for the automotive industry. The plating operations utilized three different plating solutions: alkaline cyanide-copper, acidic nickel, and trivalent chromium. Historical records from the New Jersey Department of Environmental Protection (NJDEP) indicate that from 1956 to 1975, processed sludge, rinse water, cleaning solutions, and plating wastes, were discharged from the Facility into an unlined trench leading to adjacent forested wetlands, prior to discharge to the forested wetlands. In 1981, a closed loop treatment system was installed. Following installation of the treatment system, only non-contact cooling water was discharged into the wetlands under a New Jersey Pollution Elimination Discharge System (NJPDES) permit.

In 1983, Pioneer was directed by the NJDEP to convert to abandoned production wells to groundwater monitoring wells for the purpose of conducting quarterly groundwater sampling. In addition, Pioneer was directed by the NJDEP to collect and analyze soil and sediment samples. Results of the soil, sediment, and groundwater samples, revealed contamination of soil, sediment, and groundwater, with chromium, nickel, copper (in soil and sediment), zinc (in soil), lead (in soil and groundwater), and cyanide (in groundwater). In 1993, the NJDEP issued an administrative consent order to Pioneer, which required Pioneer to conduct a remedial investigation and cleanup for the soil, sediment, and groundwater contamination identified by the 1983 sampling.

The current property owner and one part-time employee currently conduct a small powder coating operation at the Site. Upon closure of the chrome plating operation, it is believed that chrome plating bath solution, wastewater from the chrome plating process, and chrome plating residues, were transferred into 55-gallon drums, and have been haphazardly stored on-site for a period of approximately 13 years.

On June, 27, 2018, two NJDEP inspectors initiated an inspection at the Site; however, the inspectors encountered minor skin irritation and were forced to conclude their inspection prematurely. On July 5, 2018, a multi-media visit was conducted at the Site with the Franklin Township Fire Department, Franklin Township Fire Marshall's Office, Gloucester County Office of Emergency Management and the NJDEP-Bureau of Emergency Response (BER). During the course of the inspection, NJDEP representatives observed 55-gallon drums, approximately 150 in number, containing chrome plating bath solution, wastewater from the chrome plating process, and chrome plating residues. Additional smaller containers were scattered throughout the Facility; two of the containers are believed to contain sodium cyanide. The majority of the containers stored on the Site are unlabeled and in poor condition (disintegrated, rusted, saturated with rainwater, leaking, etc.). Additionally, several hundred containers of miscellaneous laboratory reagents and chemicals (corrosives, oxidizers, etc.) were discovered within a small laboratory which has not been operational since 2002. The NJDEP inspectors noted that the building has significant roof damage, poor lighting, poor housekeeping, and inadequate aisle spaces. This situation presents a serious and uncontrolled safety and environmental risk.

2.0 Scope of Work

RST 3 was tasked by EPA with conducting an initial site investigation which included: air monitoring throughout the Facility, collection of samples from select containers for field characterization testing to confirm the presence of corrosive and/or flammable materials, documentation of container labels describing hazardous materials, documentation of conditions throughout the Site, photographic documentation, and notation of all Site activities in the Site logbook.

3.0 On-Site Personnel

Name	Affiliation	Duties On-site
Terry Kish	EPA, Region II	On-Scene Coordinator
Michael Beuthe	Weston Solutions, Inc. RST 3, Region II	Site Project Manager, Site H&S, Site QA/QC, Sample Collection, and Sample Management
Michael Lang	Weston Solutions, Inc. RST 3, Region II	Air Monitoring and Sample Collection
Kathryn Donohue	Weston Solutions, Inc. RST 3, Region II	Air Monitoring, Sample Collection, and Field Characterization Testing

EPA: U.S. Environmental Protection Agency H&S: Health and Safety

RST 3: Removal Support Team 3 QA/QC: Quality Control/Quality Assurance

4.0 Summary of Site Activities and Observations

On July 24, 2018, EPA and RST 3 mobilized to the Site. An initial entry into the Facility was performed, and ambient air monitoring was conducted throughout the Facility buildings in order to determine the appropriate levels of PPE required for subsequent entries into the Facility. Utilizing a MultiRAE equipped with a photo ionization detector (PID) and hydrogen cyanide (HCN) sensor, ambient air was monitored for volatile organic compounds (VOCs) and HCN, and gamma radiation was measured using a Ludlum (Model 19) Micro-R meter in order to determine if radiation levels in the Facility were equal to or greater than three times background. Based on the initial ambient air monitoring results, it was determined that Level D and modified Level D PPE was appropriate for subsequent entries into the Facility.

Following the initial entry, RST 3 personnel and the EPA On Scene Coordinator (OSC) accessed the Facility to observe the overall conditions and identify containers for field characterization testing. The observations made during the site investigation began in the former plating and current powder coating operation room, which consists of the powder coating operations area in the western portion of the room and the former plating area located on the eastern portion of the room. The former plating area is poorly illuminated, and is occupied by two sections of plating vats and a structurally compromised walk-way which was formerly used to access the vats. The structural integrity of the walkway prevented access to a majority of the plating vats. However, the plating vats observed in the Facility appeared to be either empty or less than 10 percent (%) full, and the Hazardous Material Identification System (HMIS) labels placed on the vats had checkmarks which indicated health hazard. In addition, numerous containers, including 55 gallon drums and smaller containers (i.e. 5-gallons or less), were scattered throughout the former plating area. The majority of the containers observed in the former plating area were unlabeled and in poor condition, including several open containers filled with trash and liquids suspected to be rain water. Several 55-gallon fiber drums observed in the former plating area had labels indicating corrosive hazard

The majority of the storage area was empty, with discontinuous container accumulation areas, and poor illumination in the southeastern and southern portions of the room. Containers observed in the storage area included several 55-gallon polyethylene (poly) drums with ammonium hydroxide and corrosive hazard labels staged near the entrance to the powder coating operation area, numerous double stacked 55-gallon drums in the southeastern portion of the storage area, and several smaller containers staged outside of the former laboratory. The former blower exhaust room was poorly illuminated and appeared unused, and the former blower exhaust was situated in the center of the room. The office area consisted of an office, break room, and waiting room. The office area appeared unused, however, visible signs of deterioration, including cracked paint, and rusting, was observed. The former laboratory consisted of various laboratory apparatus, glassware, and numerous empty containers of miscellaneous laboratory agents and chemicals.

Concerns of structural integrity prevented EPA and RST 3 from accessing areas of the Facility were holding tanks and the settling and treatment tanks are located. Numerous containers, including 55-gallon drums and smaller containers, were observed throughout the boiler room and the former wastewater treatment room. Most of the containers were in poor conditions, and several containers had hazardous materials labels, including groups of 5-gallon poly containers with sodium hydroxide and corrosive hazard labels, which were staged in the boiler room near the

garage bay door. Additional observations in the boiler room and the former wastewater treatment room included yellowish-green sediment-like material on the floor of the boiler room, and several storage and treatment tanks in the former wastewater treatment room, which were used as part of the former wastewater treatment system.

Observations in exterior areas of the Site include two trailers and a drainage pipe located immediately northeast of the Facility. One of the trailers was open, and appeared to be filled with debris and numerous containers, including 55 gallon drums and smaller containers. A drainage pipe was observed, and it extended approximately 60 feet from the former wastewater treatment room to an area of sand and gravel with sparse vegetation.

Approximately 500 containers were observed throughout the Facility. Of these 500 containers, a total of eight containers were selected by the EPA OSC for field characterization testing, including two 55-gallon poly drums respectively with ammonium hydroxide and corrosive hazard labels (Container Numbers [Nos.] 0001 and 0003) located in the storage area near the entrance to the powder coating operation area; a 1-gallon glass container with an ethyl acetate label and flammable hazard label (Container No. 0005) located in the storage area; a 5-gallon poly container with a hand-written "DI Water" label (Container No. 0002) located in the storage area near the former laboratory; a plating vat located in the northern plating vat area of the former plating and current powder operations room; an open 55-gallon poly drum with health hazard check-marked on the HMIS label and "Acid" hand-written next in the "special protection" area of the label (Container No. 0004) located in the former plating and current powder operations room near the entrance to the boiler room (Container No. 0006); a 5-gallon poly container with a sodium hydroxide and corrosive hazard label (Container No. 0008) located in the boiler room near the garage bay door; and a 55-gallon drum with health hazard warning label (Container No. 0007) located in the former wastewater treatment room.

Samples were collected from the eight containers for field characterization testing, including pH and flammability, and photographic documentation was performed for each container that was sampled. In addition, descriptions and information regarding container: type, size, condition, volume, location, sub location, top description, headspace readings for VOCs, and label information were recorded on container-specific data sheets for each of the eight containers.

Refer to Attachment A, Figure 3: Container Location, Description and Field Characterization Testing Results Map, Attachment B, Table 1: Container Description and Field Characterization Testing Results Table, and Attachment C: Photographic Documentation Log.

5.0 Sampling Methodology

All field work was performed in accordance with the RST 3 Site-Specific Health and Safety Plan (HASP) and EPA's Emergency Response Team (ERT)/Scientific, Engineering, Response & Analytical Services (SERAS) contractor's Standard Operating Procedures (SOPs) Number (No.) 2001: General Field Sampling Guidelines.

Container sampling was performed in accordance with guidelines outlined in EPA's ERT/SERAS contractor's SOP No. 2009: *Drum Sampling*. After inspecting a container to verify that there was no evidence of pressure build up, the container was opened, the contents were extracted using dedicated disposable coliwasas, drum thieves, bailers or plastic scoops, and then transferred into 4 ounce (oz.) glass sample jars. Subsequently, RST 3 performed field characterization testing of the samples on-site.

6.0 Field Characterization Testing Methodology

Utilizing Hazard Categorization (HazCat) field screening methodologies, field characterization testing, including pH and flammability, was conducted for each container sample. The results of each field characterization test, as well as the physical description of each sample, were recorded alongside the container descriptions on the same container specific log sheets.

7.0 Field Characterization Testing Results

Field characterization testing was conducted to identify containers in which hazardous materials were stored on-site. Hazardous materials categorized as flammables were determined based on the HazCat flammability tests and hazardous materials categorized as corrosives (i.e. a pH greater than or equal to (\ge) 12.5, or less than or equal (\le) to 2) were determined based on HazCat corrosivity tests, including pH paper tests.

Based on field characterization testing results, Container No. 0005 met the criteria for flammables, and Container Nos. 0002 and 0008 met the criteria or corrosives. Container No. 0005 is a 1-gallon glass container located in the storage room with a VOC headspace reading of 129 parts per million (ppm) and an ethyl acetate and flammable hazard label. The sample collected from Container No. 0005 was a clear, colorless liquid.

Container No. 0002 is a 5-gallon poly container located in the storage room near the former laboratory with a hand-written "DI Water" label. The sample collected from Container No. 0002 was a clear, colorless liquid, with a pH of 1, which meets the criteria for an acid.

Container No. 0008 is a 5-gallon poly container located in the boiler room near the garage bay door, with a sodium hydroxide and corrosive hazard label. The sample collected from Container No. 0008 was a clear, colorless liquid, with a pH of 13.

Container No. 0003 is a 55-gallon poly drum located in the storage room near the entrance to the powder coating operation area, with an ammonium hydroxide and corrosive hazard label. The sample collected from Container No. 0003 was a clear, dark-yellow liquid, with a pH of 12.

Refer to Attachment A, Figure 3: Container Location, Description and Field Characterization Testing Results Map, Attachment B, Table 1: Container Description and Field Characterization Testing Results Table, and Attachment D: Container Data Sheets

8.0 Conclusion

On July 24, 2018 RST 3 conducted an initial site investigation as part of a Removal Assessment at the Site. Overall conditions of the Facility were documented throughout the Site, and samples were collected from select containers for field characterization testing, including pH and flammability tests.

The observations made by EPA and RST 3 during the site investigation corroborates the findings of the multi-media visit conducted at the Site on July 5, 2018, by the Franklin Township Fire Department, Franklin Township Fire Marshall's Office, Gloucester County Office of Emergency Management and NJDEP-BER

determine the next steps and future actions, which may include the collection of additional samples anticipated that EPA will utilize the results and observations from this Removal Assessment to including flammables, acids, and corrosive materials, are present on-site in the Facility. It is for disposal analysis in order to determine receiving facilities in the event of a potential Removal Results of the field characterization testing indicate that containers of hazardous substances, Action at the Site.

Report prepared by:

Michael Beuthe, CHMM

RST 3 Site Project Manager

8/20/2018 Date

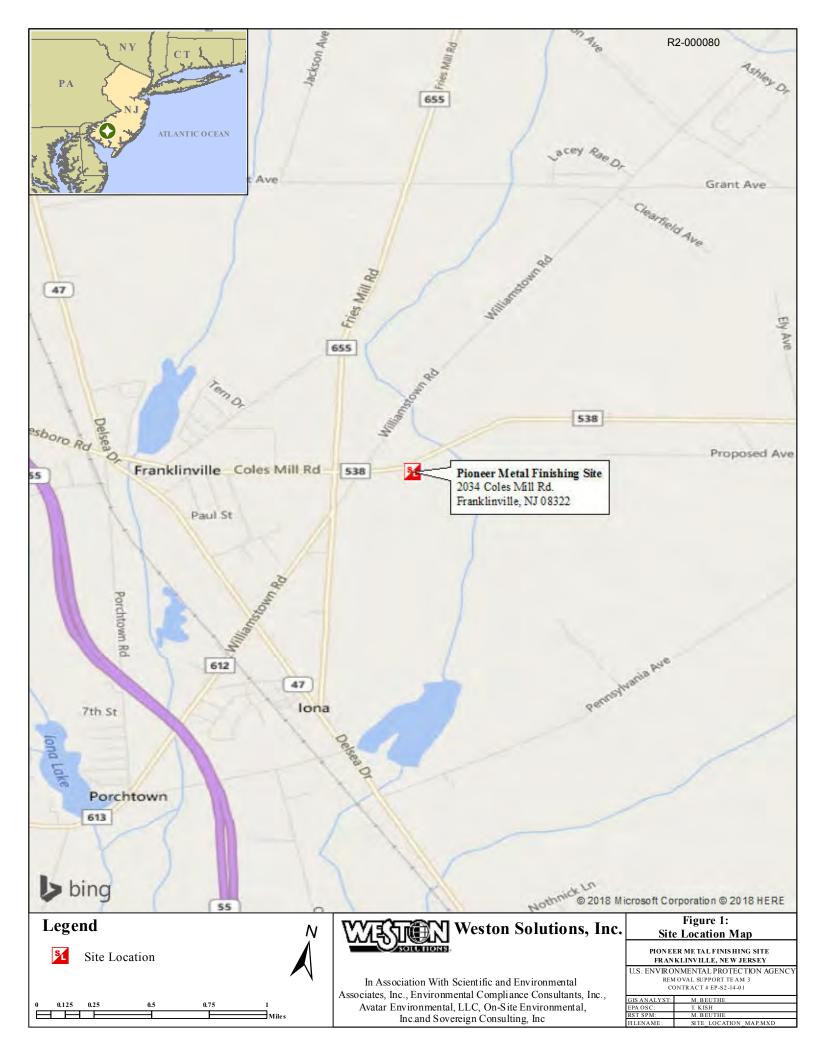
Report reviewed by: Bernard Nwosu

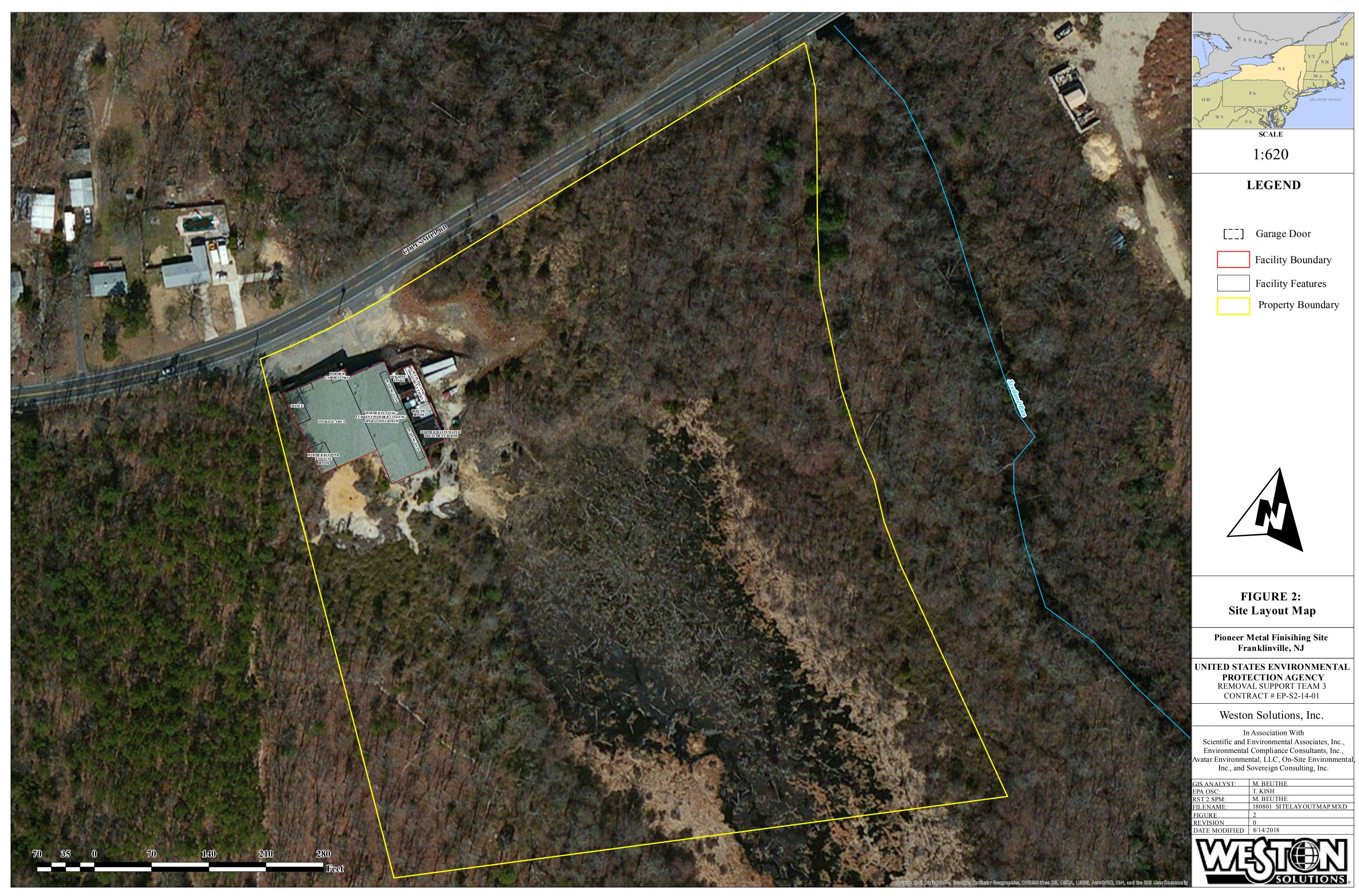
Bernard Nwosu RST 3 Group Leader

> 8/20/2018 Date

Attachment A

Figure 1: Site Location Map
Figure 2: Site Layout Map
Figure 3: Container Location, Description and Field Characterization
Testing Results Map







Attachment B

Table 1: Container Description and Field Characterization Testing Results Table

Table 1: Container Description and Field Characterzation Testing Results Table Pioneer Metal Finishing Site Franklinville, Gloucester County, New Jersey July 24, 2018

Container Number	Location	Sublocation	Container Description	Hazard labels	Company Labels	Product Description Labels	VOC Headspace (ppm)	Content Description	pН	Flammability
0001	Storage Area	Northeast corner by doorway	55 -Gal Poly Drum	Corrosive Label	Mckesson Chemical Company	Ammonium Hydroxide	0	Cloudy,dark green liquid	9	Non-Flammable
0002	Storage Area	Adjacent to Former Laboratory	5-Gal Poly Container	None	None	"DI Water" written on container	0	Clear, colorless lquid	1	Non-Flammable
0003	Storage Area	Northeast corner by doorway	55-Gal Poly Drum	Corrosive Label	Mckesson Chemical Company	Ammonium Hydroxide	0	Clear, dark-yellow liquid	12	Non-Flammable
0004	Former Plating/Current Powder Coating Operations Room	Northern Plating Vat Area (4th Vat from doorway)	Plating Vat	HMIS Label (Heath Hazard Selected; Special Protection - "Acid")	None	Hand-Written Description is not-legible	0	Dark gray, cloudy liquid	6	Combustible
0005	Storage Area	Northeast corner by doorway	1-Gal Glass Container	Flammable Label	EM Science	Ethyl Acetate (UN1173; CAS # 141-78-6)	129	Clear, colorless liquid	6	Extremely-Flammable
0006	Former Plating/Current Powder Coating Operations Room	Near entrance to Boiler Room	55-Gal Poly Drum	None	None	None	0	Solid with two inches of clear green liquied on top	7	Non-Flammable
0007	Former Wastewater Treatment Room	Northeast corner	55-Gal Poly Drum	Health Caution Label	M&T Chemical Inc.	M&T Settling Aid-A	0	Brown, cloudy liquid with suspended particulates	8	Non-Flammable
0008	Boiler Room	Southeast corner near entrance to Boiler Room	5-Gal Poly Container	Corrosive Label	Hibrett Puratex	Sodium Hydroxide (CAS # 1310-73-2)	0	Clear, colorless liquid	13	Non-Flammable

Notes:

VOC - Volatile Organic Compounds

Gal - Gallon

HMIS - Hazardous Material Identification System

ppm - parts per million

Attachment C

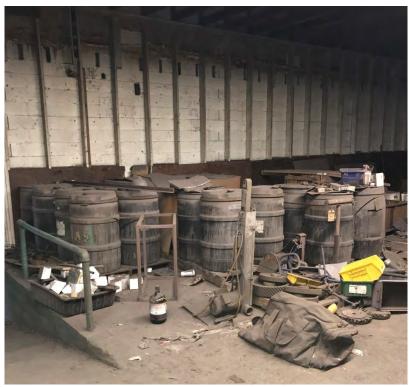
Photographic Documentation Log



Photograph 1: The U.S. Environmental Protection Agency (EPA) and its Removal Support Team 3 (RST 3) contractor, Weston Solutions, Inc., conducted a Removal Assessment at the Pioneer Metal Finishing Site (the Site). The photograph above is a view of the parking area at the Pioneer Metal Finishing Facility (the Facility).



Photograph 2: A view of the plating vats in the former plating area, facing southeast.



Photograph 3: A view of several 55-gallon polyethylene (poly) drums with ammonium hydroxide and corrosive hazard labels staged in the storage area near the entrance to the powder coating operation area, facing east.



Photograph 4: A view of the former laboratory.



Photograph 5: A view of numerous double stacked 55-gallon drums in the southeastern portion of the storage area, facing southeast.



Photograph 6: A view inside one of the two storage trailers which are located immediately northeast of the Facility.



Photograph 7: A view of several 5-gallon poly containers with sodium hydroxide and corrosive hazard labels staged in the boiler room near the garage bay door, facing west.



Photograph 8: A view inside of the boiler room, facing north northwest.



Photograph 9: A view inside of the boiler room where a yellowish-green sediment-like material was observed on the floor.



Photograph 10: A view inside of the former wastewater treatment room, facing south.



Photograph 11: A view of an area with sparse and dead vegetation located to the east and southeast of the facility, facing southeast.



Photograph 12: A view of the drainage pipe extending approximately 60 feet from the former wastewater treatment room to an area of sand and gravel with sparse vegetation, facing northwest.

Attachment D

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Number	0001						
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Size:	275 - Gal	55 Gal	30 - Ga	5- Gal	Other		
Container Type	Drūm	Tote	Paint Can	Plating Tank	Vat	AST	
Туре:	Fiber	Steel	Aluminum	Poly			
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Тор:	Bolt-Ring	Latch Ring	Bung	Closed-Top	Open		
Date:	~ 7/2	4/18					
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Container Type	Drum	Tote	Paint Can	Plating Tank		AST	T
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Date:	7/24/1	8					
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R2-000097 Number Location: Sublocation: 55- Gal Size: 275 - Gal Other 30 - Gal 8- Gal Container Type Drum Tote Paint Can Plating Tank Vat AST Type: Fiber Aluminum Steel Poly Bolt-Ring Top: Latch Ring Bung Closed-Top Open Date: Condition: Good Fair Poor Note: VOC amm Flammability pН Markings Markings / Remarks: Manufacturer: Generator: Chemical Name: % Container Full Notes

						R2-000098	!
Number	0006						
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Container Type	Drum	Tote	Paint Can	Plating Tank	Vat	AST	
Туре:	Fiber	Steel	Aluminum	Poly			
Тор:	Bolt-Ring	Latch Ring	Bung	Closed-Top	OBen		
Date:	,	7/29/18	•				
Condition:	Good	Fair	Roor.	Note:			
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Number	0007						
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Sublocation:	Nw c	POLINE					
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Container Type	Dram	Tote	Paint Can	Plating Tank	Vat	AST	
Туре:	Fiber	Steel	Aluminum	Poly			
Тор:	Bolt-Ring	Latel Ring	Bung	Closed-Top	Open	1,	
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Condition:		Enip	Poor	Note:			
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Flammability	nonfl	ann					
pН	Ż						
Markings							
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	Manufacturer:	4.	Chen	ricals . I	Enc.		
	Generator:						
	Chemical Name:						
	% Container Full	A	7. 3	11	4/5		
	% Container Fun) ey	12			
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and be	mg 13 90	en					
			186				

						R2-0001	100
Number	1008	,					
Location:		wask was	V Tach	ent Areg			
Sublocation:	NW come	er next to	boiler	אונט אין			
Size:	275 - Gal	55- Gal	30 - Gal	5-Gal	Other		
Container Type	Drum	Tote	Paint Can	Plating Tank	Vat	AST	Contare
Туре:	Fiber	Steel	Aluminum	Pory			
Тор:	Bolt-Ring	Latch Ring	Bung	Closed-Top	Open		
Date:	7/0	9/18				1	
Condition:	Good	Fair	Poor	Note:			
voc							
Flammability	non f	Hann					
pH	1 1 1						
Markings					- Wegan		
N	Markings / Remarks:	Coms Ne	- Mazer	12			
	Manufacturer:		77	2 urate	0		
	Generator:		,	7-7			
	Chemical Name:	Salium	hudox	in CrA	5 [3/0-	-73 -	22
	% Container Full	7=0141	9/10	12	, DIA	•)
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