# SDMS US EPA REGION V -1

SOME IMAGES WITHIN THIS DOCUMENT MAY BE ILLEGIBLE DUE TO BAD SOURCE DOCUMENTS.

WPCLMB

EPA SPILLS WSH
27 MAY 1982 11:00AM

SUBJ: DEAD CREEK SITE, SAUGET ILLINOIS

FROM: H.D. VAN CLEAVE, ACTING DIRECTOR
EMERGENCY RESPONSE DIVISION

TO: MIKE O'TOOLE OSC
REGION V

THIS WILL CONFIRM APPROVAL OF IMMEDIATE REMOVAL ACTION AT DEAD CREEK SITE.
ACTION TO BE TAKEN UNDER SOLE SOURCE CONTRACT. SUBMIT 12 POINT DOCUMENT PER CHAPTER 3 OF CONTRACTS MANAGEMENT MANAUAL.

CEILING ESTABLISHED AT $70,000. APPROVED WORK INCLUDES FENCE INSTALLATION WITH LOCKING GATE, WARNING SIGNS.

PLEASE KEEP US INFORMED OF PROGRESS AT THE SITE.

ENDIT

EPA SPILLS WSH

ec'd
10/2/82
[illegible]

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EPA SPILLS WSH

RECEIVED
SEP 25 1984
IEPA-DLPC

ec'd
10/02/82
hand delivered by M O'Toole

FINAL

# APPENDIX E
# MODEL WORKSHEETS

Site Name: [illegible] / Dead Creek

Location: St. Clair County

EPA Region: FIVE

Person(s) in Charge of the Site: unknown

Name of Reviewer: Tim Greene

Site Overall Score: 9.37 (F&E = 5.83, D.C. = 81.00)

General Description of the Site:

(For example: landfill, surface impoundment, pile, container; types of wastes; location of the site; contamination route of major concern; types of information needed for rating, agency action, etc.)

[illegible] - unlined
[illegible] plastics, some solids.
[illegible] bed [illegible]
[illegible]
Groundwater [illegible]
[illegible]

## ROUTE - GROUND WATER

| Rating Factor | Basis of Information | Site Rating (Circle One) | Multiplier | Site Score | Maximum Possible Score |
|---|---|---|---|---|---|
| **1 OBSERVED RELEASE** (ref GW 1) | | | | | |
| Measured Level of Evidence of Release | | 0 45 | 1 | 45 | 45 |
| If the site score is zero, go to step 2 otherwise, go to step 5 | | | | | |
| **2 ROUTE CHARACTERISTICS[1]** (ref GW 2) | | | | | |
| Depth to Aquifer of Concern | | 0 1 2 3 | 2 | | 6 |
| Net Precipitation | | 0 1 2 3 | 1 | | 3 |
| Permeability of Unsaturated Zone | | 0 1 2 3 | 2 | | 6 |
| | | | Subtotal | | 15 |
| **3 CONTAINMENT[1,3]** (ref GW 3) | | | | | |
| Containment | | 0 1 2 3 | 1 | | 3 |
| **4 POTENTIAL FOR RELEASE** | | | | | |
| Multiply site score from 2 by site score from 3 The product is site rating for this route | | | 1 | | 45 |
| **5 RELEASE** | | | | | |
| Enter site score from 1 or 4 | | | | 45 | 45 |
| **6 WASTE CHARACTERISTICS[1,3]** (ref GW 4) | | | | | |
| Physical State | Powder | 0 1 2 3 | 1 | 3 | 3 |
| Persistence | [illegible] | 0 1 2 3 | 2 | 6 | 6 |
| Toxicity/ Infectiousness | [illegible] | 0 1 2 3 | 2 | 6 | 6 |
| | | | Subtotal | 15 | 15 |
| **7 HAZARDOUS WASTE QUANTITY[1]** (ref GW 5) | | | | | |
| Total Waste Quantity | [illegible] | 0 1 2 3 4 5 | 1 | 1 | 5 |
| (by Superfund definition; excluding waste that is totally contained) | | | | | |
| **8 TARGETS[1]** (ref GW 6) | | | | | |
| Ground Water Use | [illegible] | 0 1 (2) 3 | 3 | 6 | 9 |
| Distance to Nearest Well Downgradient | [illegible] | 0 1 2 (3) | 3 | 9 | 9 |
| Population Served by Ground Water Within 3 Mile Radius | [illegible] | 0 (1) 2 3 4 5 | 6 | 6 | 30 |
| | | | Subtotal | 21 | 48 |
| **9 GROUND WATER ROUTE SUBTOTAL** | | | | | |
| A. Multiply 5 x 6 x 7 x 8 | | | | 14175 | 162,000 |
| B. Multiply (A) by Normalization Factor of 0.6 and Divide by 1,000 | | | 0.6 | 8.51 (B) Route Subtotal | 97.2 |

[1] A rating of zero should be entered when data is unavailable to rate an additive factor. A rating of 1 should be entered when data is unavailable to rate a multiplicative category such as the waste quantity or containment. A total of 5% missing data for the entire site is allowed when rating a site.

[2] If the site has more than one type of containment (e.g., surface impoundment, landfill, containment, container or tanks) separately and enter the score from the worst case.

[3] Rate the two most hazardous wastes. Select the one with the highest subtotal score and enter that score.

## ROUTE - SURFACE WATER

| Rating Factor | Basis of Information | Site Rating (Circle One) | Multiplier | Site Score | Maximum Possible Score |
|---|---|---|---|---|---|
| **1 OBSERVED RELEASE** (ref SW 1) | | | | | |
| Measured level of evidence of release | | 0 45 | 1 | 45 | 45 |
| If the site score is zero, go to step 2 otherwise, go to step 5 | | | | | |
| **2 ROUTE CHARACTERISTICS**[1] (ref SW 2) | | | | | |
| Site Slope and Terrain | | 0 1 2 3 | 1 | | 3 |
| 1 Year 24 Hour Rainfall | | 0 1 2 3 | 1 | | 3 |
| Distance to Surface Water | | 0 1 2 3 | 1 | | 3 |
| Flood Potential | | 0 1 2 3 | 2 | | 6 |
| | | | Subtotal | | 15 |
| **3 CONTAINMENT**[1,2] (ref SW 3) | | | | | |
| Containment | | 0 1 2 3 | 1 | | 3 |
| **4 POTENTIAL FOR RELEASE** | | | | | |
| Multiply site score from 2 by site score from 3 The product is site rating for this route | | | 1 | | 45 |
| **5 RELEASE** | | | | | |
| Enter site score from 1 or 4 | | | | 45 | 45 |
| **6 WASTE CHARACTERISTICS**[1,3] (ref SW 4) | | | | | |
| Physical State | | 0 1 2 3 | 1 | 3 | 3 |
| Toxicity/ Infectiousness | | 0 1 2 3 | 2 | 6 | 6 |
| Persistence | | 0 1 2 3 | 2 | 6 | 6 |
| | | | Subtotal | 15 | 15 |
| **7 HAZARDOUS WASTE QUANTITY**[1] (ref SW 5) | | | | | |
| Total Waste Quantity | | 0 1 2 3 4 5 | 1 | 1 | 5 |
| (by Superfund definition) excluding waste that is totally contained | | | | | |
| **8 TARGETS**[1] (ref SW 6) | | | | | |
| Surface Water Use | | 0 1 2 3 | 3 | 6 | 9 |
| Critical Habitats | [illegible] | 0 1 2 3 | 2 | 2 | 6 |
| Population Served by Surface Water With Water Intake Within 3 Miles Downstream From Site | 0 | 0 1 2 3 4 5 | 6 | 0 | 30 |
| | | | Subtotal | 8 | 45 |
| **9 SURFACE WATER ROUTE SUBTOTAL** | | | | | |
| A. Multiply 5 x 6 x 7 x 8 | | | | 1400 | 151,875 |
| B. Multiply [A] by normalization factor of 0.64 and divide by 1,000 | | | 0.64 | [illegible] (B) Route Subtotal | 97.2 |

ROUTE - AIR

| Rating Factor | Basis of Information | Site Rating (Circle One) | Multiplier | Site Score | Maximum Possible Score |
|---|---|---|---|---|---|
| **1 OBSERVED RELEASE*** | | | | | |
| Evidence of Release | [illegible] | 0 45 | [illegible] | 45 | 45 |
| If the site score is zero, the route subtotal score is zero, otherwise go to Step 2 | | | | | |
| **2 RELEASE** | | | | | |
| Enter site score from 1 | | | | 45 | 45 |
| **3 WASTE CHARACTERISTICS** | | | | | |
| Physical State Volatility | | 0 1 2 3 | 1 | 2 | 3 |
| Reactivity | | 0 1 2 3 | 1 | 1 | 3 |
| Incompatibility | | 0 1 2 3 | 1 | 2 | 3 |
| Toxicity Infectiousness | | 0 1 2 3 | 2 | 6 | 6 |
| | | | Subtota | 11 | 15 |
| **4 HAZARDOUS WASTE QUANTITY** | | | | | |
| Total Waste Quantity | | 0 1 2 3 4 5 | [illegible] | 1 | 5 |
| (Its Superfund definition excluding waste that is totally contained) | | | | | |
| **5 TARGETS** | | | | | |
| Distance to Nearest Population | | 0 1 2 3 | 2 | 6 | 6 |
| Population Within 1 Mile Radius | | 0 1 2 3 4 5 | 5 | 25 | 25 |
| Critical Environments | [illegible] | 0 (1) 2 3 | 2 | 2 | 6 |
| Land Use | | 0 1 2 3 | 1 | 3 | 3 |
| | | | Subtota | 36 | 40 |
| **6 AIR ROUTE SUBTOTAL** | | | | | |
| A. Multiply 2 x 3 x 4 x 5 | | | | 17820 | 135,000 |
| B. Multiply (A) by normalization factor of 0.72 and divide by 1,000 | | | 0.72 | 12.83 (B = Route Subtotal) | 97.2 |

*Only air monitoring data will be considered as evidence of release.

## ROUTE - FIRE AND EXPLOSION

| Rating Factor | Basis of Information | Site Rating (Circle One) | Multiplier | Site Score | Maximum Possible Score |
|---|---|---|---|---|---|
| **1 ROUTE CHARACTERISTICS*** (ref FE 1) | | | | | |
| Ignition Source | | 0 15 | 1 | 15 | 15 |
| **2 CONTAINMENT[1,2]** (ref FE 2) | | | | | |
| Containment | | 0 3 | 1 | 3 | 3 |
| **3 POTENTIAL FOR RELEASE** | | | | | |
| Multiply site score from 1 by site score from 2. The product is site rating for this route | | | 1 | 45 | 45 |
| **4 RELEASE** | | | | | |
| Enter site score from 3 | | | | 45 | 45 |
| **5 WASTE CHARACTERISTICS[1,3]** (ref FE 3) | | | | | |
| Ignitability | [illegible] | 0 (1) 2 3 | 1 | 1 | 3 |
| Reactivity | [illegible] | 0 (1) 2 3 | 1 | 1 | 3 |
| Incompatibility | | 0 (1) 2 3 | 1 | 1 | 3 |
| | | | Subtotal | 3 | 9 |
| **6 HAZARDOUS WASTE QUANTITY[1]** (ref FE 4) | | | | | |
| Total Waste Quantity | [illegible] | 0 1 2 3 4 5 | 1 | 1 | 5 |
| (by Superfund definition) excluding waste that is totally contained | | | | | |
| **7 TARGETS[1,2]** (ref FE 5) | | | | | |
| Distance to Nearest Population | [illegible] | 0 1 2 3 4 (5) | 1 | 5 | 5 |
| Distance to Nearest Off Site Building | | 0 1 2 (3) | 1 | 3 | 3 |
| Distance to Environmentally Sensitive Area | | 0 1 2 3 | 1 | 0 | 3 |
| Land Use | [illegible] | 0 1 2 (3) | 1 | 3 | 3 |
| Population Within 2 Mile Radius | >10,000 | 0 1 2 3 4 (5) | 1 | 5 | 5 |
| Number of Buildings Within 2 Mile Radius | >2600 | 0 1 2 3 4 (5) | 1 | 5 | 5 |
| | | | Subtotal | 21 | 24 |
| **8 FIRE AND EXPLOSION ROUTE SUBTOTAL** | | | | | |
| A. Multiply 4 x 5 x 6 x 7 | | | | 7875 | 48,600 |
| B. Multiply [A] by normalization factor of 2.0 and divide by 1,000 | | | 2.0 | [illegible] (B) Route Subtotal | 97.2 |

*The fire and explosion route will be considered only if a state or local fire marshall has certified that the site represents a significant fire and explosion threat to the public and to sensitive environment. However, any demonstrated fire and explosion threat based on field observation (e.g., explosivity meter readings) will also be considered as sufficient evidence.

## ROUTE - DIRECT CONTACT

| Rating Factor | Basis of Information | Site Rating (Circle One) | | | | Multiplier | Site Score | Maximum Possible Score |
|---|---|---|---|---|---|---|---|---|
| **1 OBSERVED RELEASE*** ref DC 1 | | | | | | | | |
| Evidence of Contact | | 0 | | 45 | | | 45 | 45 |
| If the site score is zero, go to step 2. Otherwise, go to step 5 | | | | | | | | |
| **2 ROUTE CHARACTERISTICS** ref DC 2 | | | | | | | | |
| Accessibility of Waste | | 0 | 15 | | | | | 15 |
| **3 CONTAINMENT[1,2]** ref DC 3 | | | | | | | | |
| Containment | | 0 | 1 | 2 | 3 | | | 3 |
| **4 POTENTIAL FOR RELEASE** | | | | | | | | |
| Multiply site score from 2 by site score from 3. The product is site rating for this route. | | | | | | | | 45 |
| **5 RELEASE** | | | | | | | | |
| Enter site score from 1 or 4 | | | | | | | 45 | 45 |
| **6 WASTE CHARACTERISTICS[1,3]** ref DC 4 | | | | | | | | |
| Toxicity/ Infectiousness | P.P. | 0 | 1 | 2 | (3) | 5 | 15 | 15 |
| **7 TARGETS[1]** ref DC 5 | | | | | | | | |
| Population Within 1 Mile Radius | >10,000 | 0 | 1 | 2 | 3 | 4 (5) | 20 | 20 |
| Critical Habitat | within 5 miles | 0 | (1) | 2 | 3 | 2 | 2 | 6 |
| Land Use | Agricultural | 0 | 1 | 2 | (3) | 2 | 6 | 6 |
| | | | | | | Subtotal | 28 | 32 |
| **8 DIRECT CONTACT ROUTE SUBTOTAL** | | | | | | | | |
| A. Multiply 5 x 6 x 7 | | | | | | | 18,900 | 21,600 |
| B. Multiply [A] by normalization Factor of 4.5 and divide by 1,000 | | | | | | 4.5 | 85.05 B. Route Subtotal | 97.2 |

*Health report certified by a physician will be considered as sufficient evidence

| Route | Route Subtotal from 6 or 9 | Route Subtotal Squared | Maximum Possible Score |
|---|---|---|---|
| Ground Water | 8.51 | 72.42 | $(97.2)^2 = 9447.84$ |
| Surface Water | 3.46 | 11.97 | $(97.2)^2 = 9447.84$ |
| Air | 12.83 | 164.61 | $(97.2)^2 = 9447.84$ |
| Sum | | 249.00 | 28343.52 |
| Square Root of Sum | | 15.78 | 168.36 |
| Overall Score* = $\frac{\text{sum} \times 100}{168.36}$ | | 9.37 | 100 |

| FIRE AND EXPLOSION | |
|---|---|
| Route Subtotal from 8 | Maximum Possible Score |
| 5.67 | 97.2 |
| Adjusted Score = $\frac{\text{Route Subtotal} \times 100}{97.2}$ | 5.83 |

| DIRECT CONTACT | |
|---|---|
| Route Subtotal from 8 | Maximum Possible Score |
| 85.05 | 97.2 |
| Adjusted Score = $\frac{\text{Route Subtotal} \times 100}{97.2}$ | 87.50 |

*The overall and adjusted scores will be between 0 and 100. The maximum overall score for a site with only one exposure route is 57.7.

DRAFT SUBMITTED
CHANGE

WORKSHEET FOR HAZARDOUS WASTE
SITE RANKING MODEL

FIT QUALITY ASSURANCE TEAM

GENERAL

Site name and location: CAHOKIA / DEAD CREEK
ST CLAIR CO

Date(s) of site scoring: 12/14/81 & 4/29/82

Primary source(s) of information (e.g., EPA region, state, FIT, etc.):
-- IEPA FILES -
-- "Preliminary Hydrogeologic Investigation in the Northern Portion of Dead Creek & Vicinity" → 4/81 R. St. Johns.

Factors not scored (assigned 0 for additive and 1 for multiplicative) due to insufficient information:

Waste quantity

Comments or qualifications:

less score probable

DRAFT PROCEDURE CHANGE

GROUND WATER PATHWAY

1 Measured Level or Evidence of Release

Describe substance(s) and nature of release:

PCB's
Dichlorobenzene
Chloroform

Describe method of measurement or observation:

Lab Analysis in report "A Preliminary Hydrogeologic Investigation in the Northern Portion of Dead Creek and Vicinity" by Ron St. John - 4/81
Pages 31-39

2 Depth to Aquifer of Concern

Describe/name aquifer of concern:

Why is above aquifer of concern?

Depth and how determined, including sources:

Net Precipitation

Net precipitation and how determined, including source(s):

Premeability of Unsaturated Zone

Soil type(s) in unsaturated zone:

Permeability and how determined, including source(s):

CHANGE

[3] Containment

Method of waste management (e.g., surface impoundment, landfill, etc) of extreme case:

Describe basis for selecting extreme case:

Describe method(s) of waste or leachate containment for above extreme case:

Cite source(s) of information:

[6] Physical State

Physical state of waste and source of information:
[illegible] per [illegible] report previously cited.

Persistence

Most persistent compound subject to transport via ground water:

PCB

Basis for selecting compound, including source(s):
Analysis of water & soil samples showing PCB in [illegible] previously cited.

Basis for selecting persistence rating score:

Mobile PCB based rating

Toxicity/Infectiousness

Toxic materials subject to transport via ground water and Sax or NFPA level for each:

PCB -- [illegible] level [illegible]

CHANGE

Cite source(s) of information indicating toxics present on site:

Report by EPA 1981 previously cited.
and lab analysis reports.

Infectious materials present on site and source(s) of information:

—

Basis for selecting CDC classification of infectious materials:

—

## 7 Total Waste Quantity

Total waste quantity present, including unit of measurement (e.g., tons, cubic yards drums):

UNKNOWN?

Basis for estimating or computing quantity, including source(s) of information:

## 8 Ground Water Use

Use(s) of aquifer of concern and source(s) of information:

INDUSTRIAL USE — ILLINOIS WATER SURVEY

### Distance to Nearest Well Downgradient

Distance to nearest well downgradient:

Adjacent. [illegible] BUT CAUSES [illegible] CONTAMINATED WELL.

How was downgradient direction(s) established, including source(s) of information:

PGGC [illegible] to SW.

How was distance determined?:

Is nearest building known to be using ground water? Source of information:

[illegible] nearest [illegible]

CHANGE

Is nearest well known to be drawing from aquifer of concern? Source of information: YES, ILLINOIS WATER SURVEY

Population Served by Ground Water Within 3-Mile Radius

Population served with 3-mile radius: ~14

How was population counted or computed, including source(s) of information: DRINKING WELL WAS DRILLED FOR INDUSTRIAL TRAC SUPPLY E ST. LOUIS 1980 PER ILLINOIS WATER SURVEY

Is population known to be served by aquifer of concern? Source of information:

YES. ILLINOIS WATER SURVEY

CHANGE

SURFACE WATER PATHWAY

[1] Measured Level or Evidence of Release

Describe substances and nature of release:

Contaminants deposited directly into creek waters - Lab analysis of creek downstream and certain company holding ponds show contamination

Describe method of measurement or observation:

Documented in report of 4/81 previously cited.

[2] Site Slope and Terrain

Computation of slope and description of points of measurement:

Cite source(s) of information (topo maps, etc.):

1-Year 24-Hour Rainfall

Amount of rainfall and source of information:

Distance to Surface Water

Distance and description of points of measurement:

Cite source(s) of information:

Flood Potential

In what flood plain, if any, is the site located?:

Cite source(s) of information:

CHANGE

[3] Containment

Describe basis for selecting extreme waste management case:

Describe method(s) of waste or leachate containment for extreme case:

Cite source(s) of information:

[8] Surface Water Use

Use(s) of downstream surface water and sources of information:

(2) RECREATION

Critical Habitats

Location and descritpion of downstream critical habitat, if any:

Between 100 yr. & 500 yr. floodplain

Distance and description of points of measurement:

Cite source(s) of information:

USGS -

topo maps

Population Served By Surface Water with Water Intake Within 3 Miles Downstream from Site

Population served by water intake(s): 0

Is surface water within 3 miles in a tidal estuary?: No

CHANGE

Description(s) and location(s) of intake(s) and corresponding population served by each:

How was population counted or computed?:

Cite source(s) of water-intake and population information:

Lambs Public Water Supply

CHANGE

AIR PATHWAY

[1] Evidence of Release

Describe contaminant and monitoring which reveal that background levels have been exceeded?:

Wonderling Creek EED.

Cite source(s) of information:

Photographs by J. DeSelm (IEPA - FOS) on 5/2/80 & 5/6/80

[3] Physical State/Volatility

Physical state of waste and source(s) of information:

LIQUID - report previously cited.

Vapor pressure of waste and source(s) of information:

Reactivity

Reactive substances and source(s) of information:

DICHLOROBENZENE UNDER ELEVATED TEMP. & PRESSURE (SAX)

NFPA level for each and basis of selection:

(1) - FLASH POINT OF DICHLOROBENZENE IS 150°F (SAX)

Incompatability

Incompatible substances which are present and source(s) of information:

1,4-DICHLOROBENZENE COULD REACT VIGOROUSLY WITH OXIDIZING MATERIALS.

Basis for selecting incompatibility score:

MITRE MODEL TABLE (p 87)

CHANGE

[5] Distance to Nearest Population

Distance and description of points of measurement:

WITHIN 1/4 MILE - HOUSES ADJACENT TO CREEK ON THE SOUTHEAST

Cite source(s) of information:

TOPOGRAPHIC MAP (CAHOKIA QUAD).

Population Within 1-Mile Radius

Population and how counted or computed:

>10,000 -- TOWNS OF CAHOKIA, CENTREVILLE & JARGET IN CLOSE PROXIMITY

Cite source(s) of information:

TOPOGRAPHIC MAP & POPULATION CHART.

Land Use

Location and type of determining land use:

AGRICULTURAL - ADJACENT WEST
INDUSTRIAL ADJACENT NORTH
RESIDENTIAL ADJACENT SOUTHEAST

Distance to determining land use: <1/4 MILE

Cite source(s) of information:

VISUAL OBSERVANCE, IEPA FILES.

CUPPINS
8-9/81

# CAHOKIA / DEAD CREEK

## GW PATHWAY

[8] GW USE (PAGE 4)
- NOT USED - PER REGIONAL MANAGER OR WHAT?
- SOURCE OF INFO. FOR "IS NEAREST BLDG. KNOWN TO BE USING GW?" TO JUSTIFY ASSIGNED RANKING
- SOURCE OF INFO FOR "IS NEAREST WELL KNOWN TO BE DRAWING FROM AQUIFER OF CONCERN?" TO JUSTIFY ASSIGNED RANKING.

[8] POPULATION SERVED BY GW WITHIN 3-MILE RADIUS (PAGE 5)
- "HOW WAS POPULATION COMPUTED - INCLUDING SOURCE OF INFO." TO JUSTIFY ASSINGED RANKING
- SOURCE OF INFO. FOR "IS POPULATION KNOWN TO BE SERVED BY AQUIFER OF CONCERN?" TO JUSTIFY RANKING.

## SW PATHWAY

[8] SW USE (PAGE 7)
- INDICATE USE OF DOWNSTREAM SW TO JUSTIFY "2" RANKING
- INDICATE CRITICAL HABITAT, etc. USE IN ASSIGNING THE "2" RANKING.
- POPULATION SERVED ... (PAGE 8)

  INDICATE SOURCE OF WATER INTAKE & POPULATION INFORMATION, ie- WHO TOLD YOU THAT NO POPULATION IS SERVED BY GROUNDWATER

  NOTE: REMEMBER THAT IF SW IS USED AS IRRIGATION WATER, THE ACRES OF LAND IRRIGATED OR GRAZED CAN BE CONVERTED TO POPULATION SERVED (P. 81 OF THE MODEL)

CAHOKIA / DEAD CREEK

NOTES - ① WHERE A PARTICULAR STUDY IS CITED, NOTE PAGE #'S WHERE INFO. IS FOUND

② REMEMBER THAT "PYSICAL STATE" REFERS TO STATE OF THE WASTE AT THE TIME OF DISPOSAL. SO... SHOULD "PHYSICAL STATE" RANKING OF "3" - LIQUID FOR PCB'S BE CHANGED TO A "2" - SLUDGE? CITE WHERE INFO FOUND

③ CHECK IF WASE QUANITY VALUE REALLY UNKNOWN

④ CHECK → ATTNY. GENERAL OFFICE STATES "PRIOR HISTORY OF SOME AIR POLLUTION IMPACTS (fuming & smoldering)".