SITE ASSESSMENT REPORT
FOR THE
B&R CUSTOM CHROME SITE
TOLEDO, LUCAS COUNTY, OHIO

NPL STATUS: NON-NPL

Prepared for:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Emergency Response Branch
Region V
25089 Center Ridge Road
Westlake, OH 44145

Prepared by:

WESTON SOLUTIONS, INC.
6779 Engle Road
Suite I
Middleburg Heights, OH 44130

Date Prepared:	July 11, 2012
TDD No.:	S05-0001-1206-004
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START Project Manager:	Ryan Green
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U.S. EPA On-Scene Coordinator:	Jon Gulch

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Prepared by: _____ Date: July 11, 2012
Ryan Green
START Site Project Manager

Reviewed by: _____ Date: July 11, 2012
Frank Beodray
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TABLE OF CONTENTS

1. INTRODUCTION 1

2. SITE BACKGROUND 2

2.1 SITE DESCRIPTION 2

2.2 SITE HISTORY 2

3. SITE ASSESSMENT ACTIVITIES 3

3.1 CONTAINER INVENTORY 4

3.2 CONTAINER SAMPLING 6

4. ANALYTICAL RESULTS 6

4.1 DRUM SAMPLING ANALYTICAL RESULTS 7

4.2 VAT SAMPLING ANALYTICAL RESULTS 7

4.3 AST SAMPLING ANALYTICAL RESULTS 8

4.4 UST SAMPLING ANALYTICAL RESULTS 8

4.5 TRANSFORMER SAMPLING ANALYTICAL RESULTS 9

5. THREATS TO HUMAN HEALTH AND THE ENVIRONMENT 9

6. SUMMARY AND CONCLUSIONS 11

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LIST OF FIGURES

1 Site Location Map

2 Site Features Map

3 Inventory Areas Map

LIST OF TABLES

1 Container Inventory

2 Analytical Results

LIST OF APPENDICES

A Photographic Documentation

B Data Validation Report

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ABBREVIATIONS AND ACRONYMS

AST	Aboveground storage tank
CFR	*Code of Federal Regulations*
ERB	Emergency Response Branch
ERRS	Emergency and Rapid Response Services
H&A Realty	H&A Realty, Inc.
mg/kg	Milligram per kilogram
mg/L	Milligram per liter
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
OSC	On-Scene Coordinator
PCB	Polychlorinated biphenyl
PPE	Personal protective equipment
RCRA	Resource Conservation and Recovery Act
START	Superfund Technical Assessment and Response Team
SU	Standard unit
SVOC	Semivolatile organic compound
TCLP	Toxicity Characteristic Leaching Procedure
TDD	Technical Direction Document
TSCA	Toxic Substances and Control Act
U.S. EPA	United States Environmental Protection Agency
UST	Underground storage tank
VOC	Volatile organic compound
WESTON	Weston Solutions, Inc.

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1. INTRODUCTION

The United States Environmental Protection Agency (U.S. EPA) Region 5 Emergency Response Branch (ERB) tasked the Weston Solutions, Inc. (WESTON®), Superfund Technical Assessment and Response Team (START) to assist with a removal site assessment at the B&R Custom Chrome site in Toledo, Lucas County, Ohio (the Site). Under Technical Direction Document (TDD) No. S05-0001-1206-004, WESTON START was tasked to perform the following activities:

- Create an inventory of abandoned wastes in drums, tanks, and other containers
- Collect samples for laboratory analysis from a selection of drums, tanks, and other containers
- Procure a laboratory to analyze all samples
- Document and summarize the potential for imminent and substantial threats to the public health or welfare of the United States or the environment

WESTON START personnel mobilized to the Site and conducted site assessment tasks under the direction of On-Scene Coordinator (OSC) Jon Gulch. Site assessment activities were conducted on June 13, 2012.

This site assessment report is organized into the following sections:

- **Section 1, Introduction –**Briefly describes the objectives of the site assessment and the site assessment report organization
- **Section 2, Site Background –** Details the Site description and history
- **Section 3, Site Assessment Activities –** Discusses methods used and activities conducted during the site assessment
- **Section 4, Analytical Results –** Discusses analytical results for samples collected during the site assessment
- **Section 5, Threats to Human Health and the Environment –** Identifies conditions at the Site that warrant a removal action under the National Oil and Hazardous Substances Pollution Contingency Plan (NCP)
- **Section 6, Summary –** Lists potential removal action activities and conditions that may warrant additional evaluation

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2. SITE BACKGROUND

This section discusses the Site description and history.

2.1 SITE DESCRIPTION

The Site is located in an urban area (mixed industrial and residential) at 1820 Clinton Street in Toledo, Lucas County, Ohio (**Figure 1**). The Site coordinates are 41.6567 North latitude and 83.5833 West longitude. The Lucas County Auditor's Office identifies the Site as Parcel No. 1311694. The Site is occupied by a former manufacturing building approximately 71,470 square feet in area. The former manufacturing building is composed of approximately 10 interconnected structures of varying ages and conditions. The nearest residence is located approximately 125 feet southwest of the Site. **Figure 2** shows the Site features map.

H&A Realty, Inc. (H&A Realty) owns the Site. The owners of H&A Realty reportedly are deceased, and the Site is in foreclosure. Portions of the former manufacturing building were rented to multiple tenants that operated electrochemical plating businesses at the Site. The Site currently is not used for manufacturing activities by any former tenants, but a metal scrapping contractor is active at the Site.

The westernmost portion of the former manufacturing building is fire-damaged and partially demolished. The fire-damaged portion of the former manufacturing building is approximately 17,700 square feet in area and is secured by a temporary chain-link fence installed by U.S. EPA along the western perimeter.

According to a representative of the City of Toledo, multiple underground storage tanks (UST) used by former owners or tenants still are located at the Site. The number, volumes, contents, and locations of the suspected USTs are unknown.

2.2 SITE HISTORY

The Site parcel was first identified for industrial land use in 1897. The Meilink Manufacturing Company, later known as the Meilink Steel Safe Company and Meilink Industries, reportedly manufactured steel safes and files at the Site from approximately the 1920s until the 1960s or

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1970s. Meilink Industries was acquired by Fire King International, now known as FireKing Security Group, in 1990.

Title information for Site ownership prior to purchase by H&A Realty was not available at the time this report was prepared. A title search may be necessary to fill this data gap.

One former renter, B&R Custom Chrome, operated an electrochemical plating business in the western portion of the former manufacturing building. B&R Custom Chrome reportedly was owned and operated by Art Smith, who also owned the former L&L plating shop in Toledo, Ohio.

On May 16, 2012, the western portion of the building was damaged by fire. The Toledo Fire Department responded and extinguished the fire at the Site.

On May 18, 2012, U.S. EPA mobilized an Emergency and Rapid Response Services (ERRS) contractor to the Site to install a temporary chain-link fence along the western perimeter of the fire-damaged portion of the former manufacturing building.

On May 24, 2012, legal representatives for Lucas County began foreclosure proceedings against H&A Realty for unpaid taxes and penalties associated with the Site. The City of Toledo obtained a warrant to access the Site for inspection and sampling activities.

3. SITE ASSESSMENT ACTIVITIES

On June 13, 2012, three WESTON START members and OSC Jon Gulch mobilized to the Site to conduct a removal site assessment, including a Site inspection and sampling activities. Paul Ringlein from the City of Toledo Division of Code Enforcement participated in the Site inspection and provided some information regarding the Site history.

The site assessment tasks were designed to document the potential for imminent and substantial threats to the public health or welfare of the United States or the environment based on guidance in the NCP, Title 40 of the *Code of Federal Regulations* (CFR), Part 300.415(b)(2). Samples were collected in accordance with a Field Sampling Plan prepared on June 12, 2012.

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The following subsections describe container inventory and sampling activities. **Appendix A** provides photographic documentation of the site assessment activities and Site conditions.

3.1 CONTAINER INVENTORY

During the site assessment activities on June 13, 2012, on-site container labels, numbers, volumes, and types were recorded on a handwritten logsheet. Except for the containers opened for sampling activities, the volumes of containerized wastes were estimated or visually approximated when possible. **Table 1** provides the container inventory. The Site was divided into eight areas for the Site inventory, Areas A through H. **Figure 3** shows the inventory area designations.

A total of 66 drums were documented at the Site. Of these 66 drums, 52 contained labeled or unknown contents and 14 were Resource Conservation and Recovery Act (RCRA)-empty. At least five drums suspected to contain oil, corrosives, or unknown contents showed signs of leaking or staining on the surrounding floor surfaces. Eighteen drums were suspected to contain trash, debris, or floor sweeping waste solids. Many of the drums had damaged, cut tops or missing bungs.

A total of 95 totes were documented at the Site. Of these 95 totes, 15 contained labeled or unknown contents and 80 were RCRA-empty. Labeling on most of the totes indicated that the original manufactured contents were polishing agents produced circa 2007 by Planar Solutions, LLC, which was acquired by Fujifilm Electronic Materials U.S.A., Inc., in 2010. However, the contents of the totes displayed wide ranges of colors, including light green, reddish-orange, light-purple, and black, suggesting that the contents were not original.

Two former plating vats were observed at the Site, both located in Area G and approximately 8 feet long, 4 feet wide, and 3 feet tall. One former plating vat was turned upside down and partially cut up. The second plating vat was located along the northern exterior wall next to 10 drums of sulfuric acid and was approximately 80 percent full of unknown, dark-gray liquid.

Three aboveground storage tanks (AST) with unknown contents were documented at the Site. All of the ASTs were located in Area F, were unlabeled, and contained unknown brown liquids.

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One UST was documented near the southeastern perimeter of the Site outside the building in Area H. An uncovered vent or filling pipe for the UST was observed cut off at the ground surface. A 0.5-inch bailer was lowered into the cut off pipe, and a dark-brown oily liquid was recovered from the UST. The size of the UST was unknown and could not be estimated from observations at the surface. Additional cut off vertical pipe stems also were observed at ground level in Areas A and B, but the fire-damaged debris piles limited investigation and access to suspected USTs in these areas.

A total of 19 small containers were documented at the Site. Of these 19 small containers, 13 contained labeled or unknown contents and 6 were RCRA-empty. One 1-gallon small container suspected to contain paint thinner and three 1-gallon small containers suspected to contain latex-based paint were documented.

A total of four former transformers containing residual transformer oil were documented in Area H at the Site. The top of each transformer was open and all of the internal electrical components had been removed, presumably for metal scrapping. The surrounding floor and walls were stained, suggesting the transformer oil may have been drained onto the floor. No more than approximately 1 gallon of yellowish-brown oil was observed in the bottom of each transformer.

A total of 18 fluorescent light ballasts were documented at the Site. Of these 18 ballasts, 13 appeared intact and 5 were damaged or broken. All the fluorescent ballasts had green tips, indicating models with reduced mercury content. However, green-tipped fluorescent ballasts often contain mercury at concentrations exceeding the Toxicity Characteristic Leaching Procedure (TCLP) limit of 0.2 milligram per liter (mg/L) and therefore are still considered universal wastes by the U.S. EPA.

A total of five cylinders were observed in Area F at the Site. All cylinders appeared to contain oxygen gas for use with an acetylene cutting torch. Some or all cylinders may belong to the scrapping contractor active at the Site and may not require disposal.

One nylon super-sack was observed in Area C at the Site. The super-sack was full and unlabeled. The super-sack appeared to contain an unknown particulate solid, but the super-sack was not opened.

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One non-functional boiler was documented in Area H at the Site. No mercury switches were visible on the former boiler. However, mercury switches may have been hidden behind panels or instrument dials mounted on the exterior of the boiler.

3.2 CONTAINER SAMPLING

Based on a review of the container inventory, five containers were selected for sampling activities. On June 13, 2012, WESTON START personnel collected drum, vat, and AST samples in Level B personal protective equipment (PPE) and transformer and UST samples in Level D PPE. The table below lists the inventory areas, container types, matrices, sample identification numbers, and notes for the samples collected.

CONTAINER SAMPLES COLLECTED JUNE 13, 2012

Inventory Area	Container Type	Matrix	Sample ID No.	Notes
G	Poly drum	Liquid	BR-D-H2SO4	Labeled sulfuric acid; missing bung
G	Steel vat	Liquid	BR-VAT1	Suspected plating waste
F	Poly AST	Liquid	BR-AST1	Unknown brown liquid
H	Steel UST	Liquid	BR-UST1	Dark-brown oily liquid
H	Transformer	Liquid	BR-TRANS1	Yellowish-brown oily liquid

Notes:
AST = Aboveground storage tank
ID = Identification
Poly = Polyethylene
UST = Underground storage tank

Each sample was transferred from the source container into labeled, 16-ounce glass sample jars using a dedicated, disposable drum thief, coliwasa tube, or bailer. Samples were stored in a cooler on ice for delivery to the designated laboratory.

4. ANALYTICAL RESULTS

On June 14, 2012, all samples were delivered under chain of custody to the designated analytical laboratory, EA Group, Inc., in Mentor, Ohio. Preliminary analytical results were transmitted electronically by the laboratory and forwarded to the OSC on June 26, 2012. A WESTON START chemist reviewed the laboratory analytical data and produced a data validation report (**Appendix B**). All laboratory results were deemed suitable for use after review.

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Table 2 lists the analytical results and applicable regulatory limits to which the results were compared. Analytical results for flashpoint, corrosivity, TCLP metals, TCLP volatile organic compounds (VOC), and TCLP semivolatile organic compounds (SVOC) were compared to the Characteristics of Hazardous Waste limits at 40 CFR Part 261, Subpart C. Analytical results for polychlorinated biphenyls (PCB) were compared to the Toxic Substances Control Act (TSCA) disposal limit of 50 milligrams per kilogram (mg/kg) at 40 CFR Part 761. The following sections discuss the analytical results for each type of container sampled.

4.1 DRUM SAMPLING ANALYTICAL RESULTS

Liquid sample BR-D-H2SO4 collected from the drum in Area G labeled sulfuric acid was analyzed for corrosivity (pH) using U.S. EPA SW846 Method 9041A. The pH result for this sample was reported as 0 standard unit (SU). According to 40 CFR 261.22(a)(1), the waste exhibits the characteristic of corrosivity.

4.2 VAT SAMPLING ANALYTICAL RESULTS

Unknown liquid sample BR-VAT1 collected from the vat in Area G was analyzed for the following:

- Flashpoint using U.S. EPA SW846 Method 1010
- Corrosivity (pH) using U.S. EPA SW846 Method 9041A
- TCLP metals using U.S. EPA SW846 Methods 6010B and 7470A
- TCLP VOCs using U.S. EPA SW846 Method 8260A
- TCLP SVOCs using U.S. EPA SW846 Method 8270C

The pH result for this sample was reported as 0 SU. According to 40 CFR 261.22(a)(1), the waste exhibits the characteristic of corrosivity.

TCLP barium was detected in the sample at a concentration of 3.04 mg/L, which does not exceed the toxicity characteristic limit for barium of 100.0 mg/L. TCLP cadmium was detected at 10.5 mg/L, which exceeds the toxicity characteristic limit for cadmium of 1.0 mg/L. TCLP chromium was detected at 535 mg/L, which exceeds the toxicity characteristic limit for cadmium of 5.0

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mg/L. TCLP lead was detected at 71.9 mg/L, which exceeds the toxicity characteristic limit for lead of 5.0 mg/L.

None of the other analytes for this sample were detected above the respective reporting limits.

4.3 AST SAMPLING ANALYTICAL RESULTS

Unknown liquid sample BR-AST1 collected from the AST in Area F was analyzed for the following:

- Flashpoint using U.S. EPA SW846 Method 1010
- Corrosivity (pH) using U.S. EPA SW846 Method 9041A
- TCLP metals using U.S. EPA SW846 Methods 6010B and 7470A
- TCLP VOCs using U.S. EPA SW846 Method 8260A
- TCLP SVOCs using U.S. EPA SW846 Method 8270C
- PCBs using U.S. EPA SW846 Method 8082A

None of the analytes for this sample were detected above the respective reporting limits.

4.4 UST SAMPLING ANALYTICAL RESULTS

Unknown liquid sample BR-UST1 collected from the UST in Area H was analyzed for the following:

- Flashpoint using U.S. EPA SW846 Method 1010
- TCLP metals using U.S. EPA SW846 Methods 6010B and 7470A
- TCLP VOCs using U.S. EPA SW846 Method 8260A
- PCBs using U.S. EPA SW846 Method 8082A

TCLP benzene was detected in the sample at a concentration of 0.89 mg/L, which exceeds the toxicity characteristic limit for benzene of 0.5 mg/L. TCLP tetrachloroethene was detected at 4.7 mg/L, which exceeds the toxicity characteristic limit for tetrachloroethene of 0.7 mg/L. TCLP trichloroethene was detected at 0.85 mg/L, which exceeds the toxicity characteristic limit for trichloroethene of 0.5 mg/L.

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None of the other analytes for this sample were detected above the respective reporting limits. However, due to the sample matrix the reporting limit for Aroclors 1254, 1260, and 1268 was 100 mg/kg. The results for these Aroclors cannot be used for determination of hazardous waste because this reporting limit exceeds the regulatory limit of 50 mg/kg for total PCBs.

4.5 TRANSFORMER SAMPLING ANALYTICAL RESULTS

Oily liquid sample BR-TRANS1 collected from the open transformer in Area H was analyzed for PCBs using U.S. EPA SW846 Method 8082A. Aroclor 1260 was detected in the sample at a concentration of 7.2 mg/kg, which does not exceed the TSCA regulatory limit for total PCBs of 50 mg/kg. None of the other Aroclors were detected above the reporting limit of 1.0 mg/kg. Based on these results, the concentration of total PCBs in the transformer oil is less than 50 parts per million.

5. THREATS TO HUMAN HEALTH AND THE ENVIRONMENT

Factors to be considered in determining the appropriateness of a potential removal action at a site are delineated in the NCP at 40 CFR 300.415(b)(2). A summary of the factors applicable to the Site is presented below.

- **Actual or potential exposure of nearby human populations, animals, or the food chain to hazardous substances or pollutants or contaminants**

  There is high risk of accidental release of uncontrolled hazardous or unknown wastes from the Site due to the deteriorated condition of the containers and the former manufacturing building, unrestricted Site access, and threat of fire as demonstrated by the fire damage to the western portion of the former manufacturing building on May 16, 2012. Uncontrolled wastes at the Site could be released to nearby soil and groundwater, the atmosphere, and the City of Toledo public storm water sewer system.

  Within a 0.5-mile radius of the Site are 2,320 residential parcels, 510 commercial and industrial parcels, one day care center, and two elementary schools. The University of Toledo also is located approximately 1.3 miles west of the Site.

  Despite the chain-link fence erected on May 18, 2012, access to the former manufacturing building is unrestricted because of an unlocked door at the southeastern corner of the Site. The U.S. EPA attempted to padlock the door during the site assessment activities on June 13, 2012, but the door no longer fits within its frame and could not be completely closed.

  On June 13, 2012, three employees of a metal scrapping contractor were observed working near unknown wastes and corrosive hazardous wastes inside the former

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manufacturing building. The metal scrapping contractors did not have PPE sufficient to protect them from all physical and chemical hazards documented at the Site. If metal scrapping activities continue at the Site, the workers may be at risk of exposure to hazardous wastes.

- **Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers that may pose a threat of release**

  During the site assessment, hazardous or unknown wastes were documented in 52 drums, 3 ASTs, 1 UST, 1 vat, and numerous small containers inside the former manufacturing building. Many containers were in poor or damaged condition and exposed to the elements from the damaged and deteriorating condition of the former manufacturing building.

  Estimated totals of containerized wastes include 150 gallons of corrosive (D002) hazardous wastes in drums; at least 560 gallons of corrosive (D002) plating solution in a former electroplating vat containing hazardous concentrations of cadmium (D006), chromium (D007), and lead (D008); 473 gallons of used oil in drums and small containers; 1 cubic yard of suspected baghouse dust or other particulate solid waste in a super-sack; an unknown quantity of oily liquid in at least one UST containing hazardous concentrations of benzene (D018), tetrachloroethene (D039), and trichloroethene (D040); and approximately 7,400 gallons of other unregulated or unknown wastes.

- **Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released**

  Several sections of roof and outer walls of the former manufacturing building are damaged. Weather conditions such as heavy rainfall, high winds, snow melt, and flooding may infiltrate the former manufacturing building and potentially further degrade waste containers or increase the likelihood of off-site migration of hazardous wastes.

- **Threat of fire or explosion**

  The western portion of the former manufacturing building was damaged by fire on May 16, 2012. The local fire department extinguished the fire. The cause of the fire was not determined but was suspected to be arson. Additional fire damage to the former manufacturing building could result in a release of hazardous wastes at or from the Site.

- **The availability of other appropriate federal or state response mechanisms to respond to the release**

  The Site is owned by H&A Realty. The owners of H&A Realty reportedly are deceased, and the City of Toledo has initiated foreclosure of the Site property due to unpaid taxes and fines.

  The City of Toledo referred the Site to the U.S. EPA ERB due to the lack of a responsive potentially responsible party and lack of funds sufficient to properly characterize and dispose of wastes at the Site.

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6. SUMMARY

The tasks completed as part of this site assessment were designed to document the potential for imminent and substantial threats to the public health or welfare of the United States or the environment posed by uncontrolled, abandoned wastes at the former B&R Custom Chrome Site in Toledo, Lucas County, Ohio. Based on an inspection of the Site and container sampling results, the removal activities summarized below may be applicable. Further evaluation may be needed in some cases to determine the actual waste quantities or to generate complete waste profile information for the designated disposal facility.

- Improve Site security measures by repairing or modifying the door at the southeastern corner of the former manufacturing building so that it can be closed and padlocked.
- Remove and dispose of approximately 150 gallons of corrosive D002 hazardous wastes in drums.
- Remove and dispose of 473 gallons of used oil in drums.
- Remove and dispose of approximately 560 gallons of D002, D006, D007, and D008 hazardous waste in an open-top vat formerly used for electroplating activities.
- Remove and dispose of an unknown quantity of D018, D039, and D040 hazardous waste from one UST, and search for any additional USTs at the Site.
- Conduct waste profile sampling of approximately 4,320 gallons of waste liquids in totes to confirm if the tote labels are accurate or if these wastes are used plating or polishing solutions.
- Remove and dispose of household hazardous wastes in small containers.
- Remove and dispose of all wastewater and non-regulated wastes in damaged open-top drums, tanks, and totes.
- Remove and dispose of fluorescent light ballasts as universal waste.
- Search all boilers and thermostats in the building for potential elemental mercury in switches and gauges.

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FIGURES

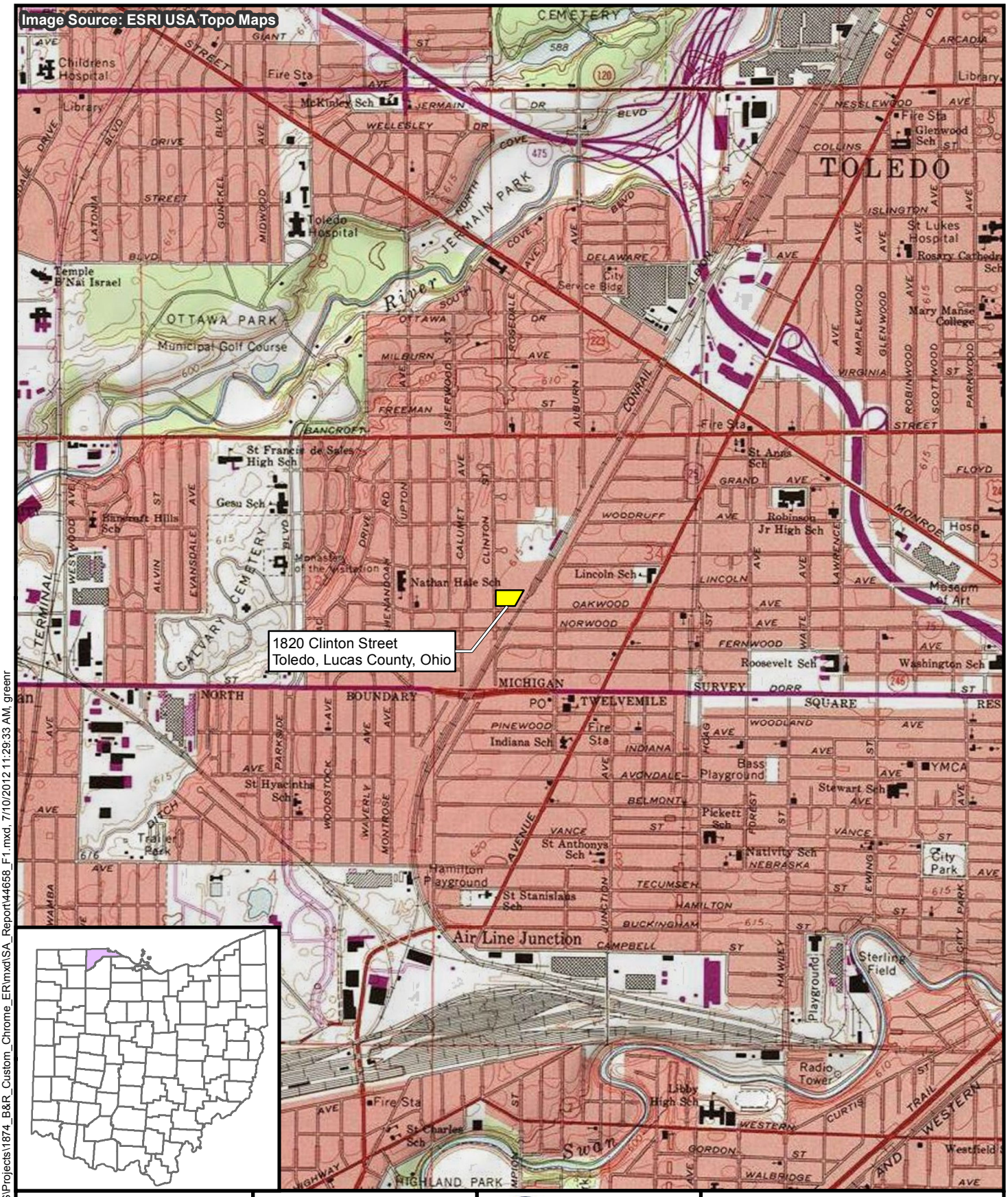

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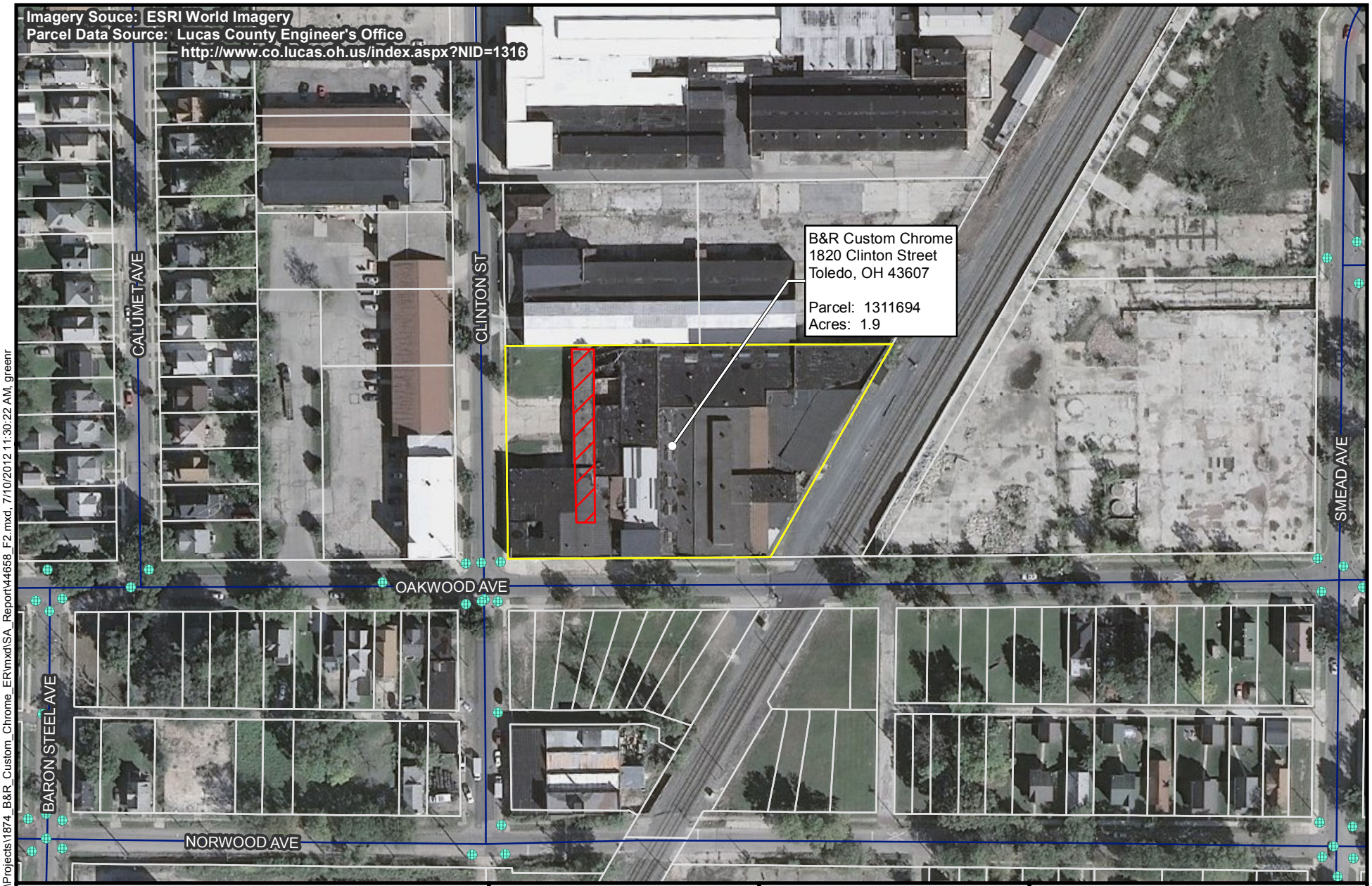
Figure 1
Site Location Map
B&R Custom Chrome Site
Toledo, Lucas County, Ohio

Path: C:\Users\greenr\GIS\Projects\1874_B&R_Custom_Chrome_ER\mxd\SA_Report\44658_F1.mxd, 7/10/2012 11:29:33 AM, greenr



Legend

- Site Boundary
- Parcels
- Fire Damage
- Road Centerlines
- Storm Sewer Grates

N

0 150 Feet

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Figure 2
Site Features Map
B&R Custom Chrome Site
Toledo, Lucas County, Ohio

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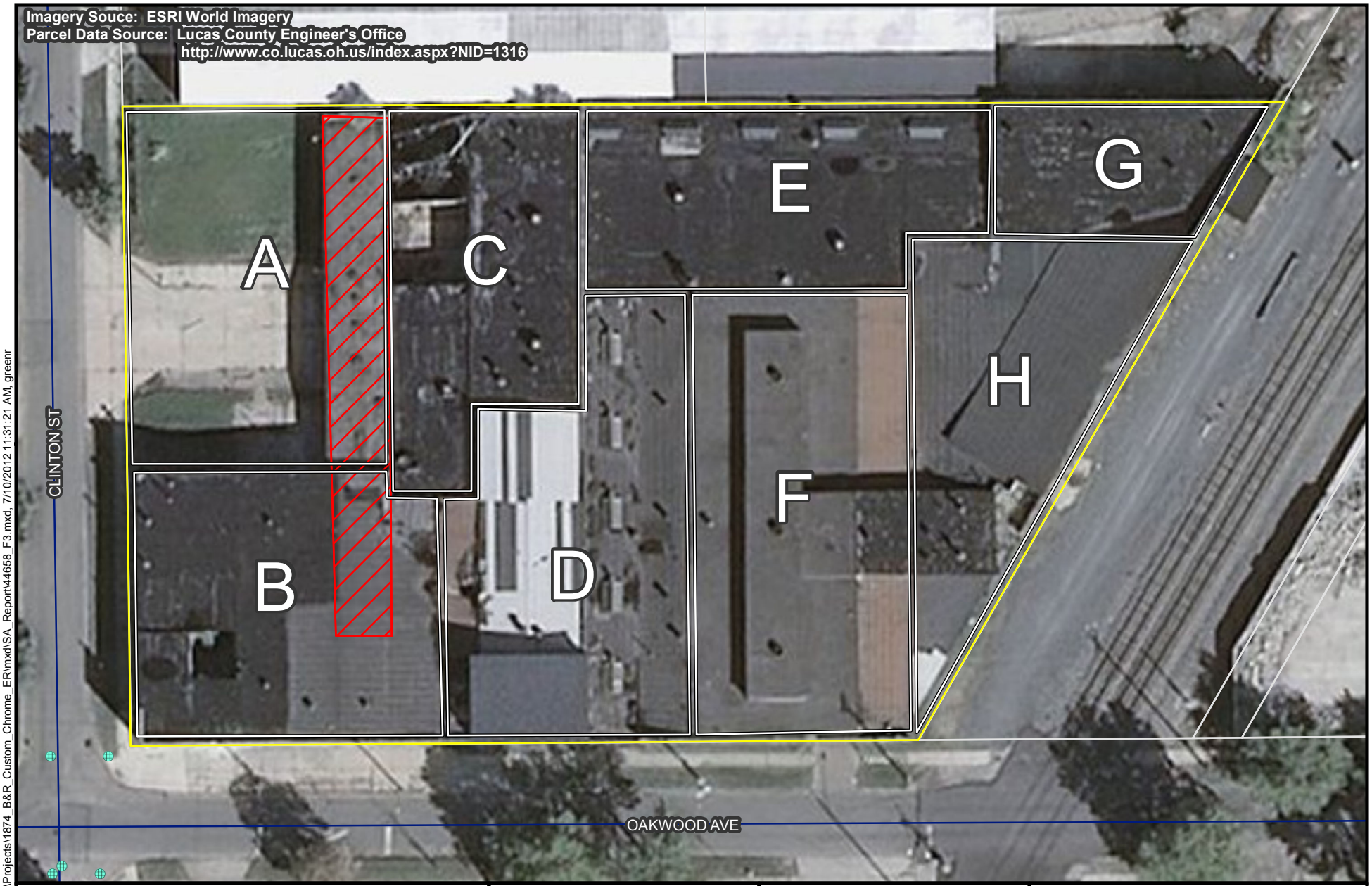

Legend

- Inventory Areas
- Fire Damage
- Site Boundary
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N

0 50 Feet

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Figure 3
Inventory Areas Map
B&R Custom Chrome Site
Toledo, Lucas County, Ohio

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TABLES

Table 1
Container Inventory
B&R Custom Chrome Site
Toledo, Lucas County, Ohio

Inventory Area [1]	No. of Containers	Container Type	Size (Gallons)	Condition	Percent Full	Total Volume (Gallons)	Labeling or Markings	Suspected Contents and Other Comments
Drums								
A	1	Poly	55	Damaged	50	27.5	None	Cut top; debris
	1	Steel	55	Poor	100	55	Electrolytic Nickle	Open top; rainwater and debris
	1	Poly	10	Damaged	0	0	None	On top of fire-damaged debris pile
B	1	Poly	55	Poor	50	27.5	None	Open top; debris
	1	Steel	55	Poor	50	27.5	None	Open top; debris
	1	Poly	30	Poor	100	30	Nickel chloride solution	Open top; debris
C	1	Poly	55	Damaged	50	27.5	Zodiac ZD-100	Cut top; debris
	2	Poly	55	Damaged	50	55	None	Cut top; debris
	9	Poly	55	Damaged	10	49.5	None	Cut top; debris
	8	Poly	55	Fair	0	0	None	Stacked on pallets
D	1	Poly	55	Damaged	50	27.5	Zodiac Mix 35/35/35	Under a makeshift table; debris
	1	Poly	55	Damaged	10	5.5	None	Rainwater or wastewater
E	1	Poly	55	Poor	0	0	None	Black drum on pallet, wet floor stain underneath
	1	Fiber	55	Damaged	50	27.5	Allied Foam Tech AFT-510B	Concrete foam; dissolved solids leaked onto floor
	1	Steel	55	Fair	100	55	Shell Tellus Oil 32	Red drum; used or unused oil
	1	Poly	15	Good	50	7.5	Muriatic Acid	pH test strip = 0 SU
	1	Steel	55	Fair	100	55	None	Open top; blue drum on pallet; used oil
	2	Poly	55	Poor	0	0	Corrosive labels	White drums; stacked
F	1	Poly	55	Poor	10	5.5	Hydrochloric Acid	In trash pile next to 2,000-gallon poly tanks
	1	Poly	30	Poor	50	15	Hydrochloric Acid 20 Be	In trash pile next to 2,000-gallon poly tanks
	2	Poly	55	Damaged	50	55	None	Blue drums wrapped in plastic, staining on floor
G	3	Poly	55	Fair	100	165	None	Closed tops; located next to plating vat
	6	Steel	55	Fair	100	330	Shell Tellus Oil 32	Red drums; used or unused oil
	10	Poly	15	Poor	100	150	Sulfuric Acid 66 Be	Two open bungs; floor stain; pH test strip = 0 SU
H	1	Poly	55	Poor	60	33	None	Used oil; in boiler room
	1	Poly	15	Poor	0	0	None	In boiler room
	1	Steel	15	Poor	0	0	None	Open bung
	5	Steel	55	Poor	10	27.5	None	Supporting a makeshift shelf

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Table 1
Container Inventory
B&R Custom Chrome Site
Toledo, Lucas County, Ohio

Inventory Area [1]	No. of Containers	Container Type	Size (Gallons)	Condition	Percent Full	Total Volume (Gallons)	Labeling or Markings	Suspected Contents and Other Comments
Totes								
A	2	Poly	300	Damaged	0	0	None	In outdoor fire-damaged area
	1	Poly	300	Damaged	0	0	None	
B	9	Poly	300	Damaged	0	0	Planar Solutions CU10K-64	Under fire-damaged roof
	1	Poly	300	Damaged	100	300	None	Rainwater or wastewater
	1	Poly	300	Damaged	0	0	None	Under fire-damaged roof
	1	Poly	300	Damaged	0	0	Planar Solutions CU10K-64	
C	61	Poly	300	Damaged	0	0	None or Planar Solutions	Stacked next to fire-damaged Area A
D	1	Poly	300	Fair	100	300	Planar Solutions CU10K-64	Used polishing or electrochemical plating solution
E	1	Poly	300	Damaged	100	300	Planar Solutions CU10K-3V	Used polishing or electrochemical plating solution
	1	Poly	300	Damaged	100	300	Planar Solutions CU10K-3V	Used polishing or electrochemical plating solution
	3	Poly	300	Poor	0	0	Planar Solutions CU10K-64	
F	1	Poly	300	Fair	80	240	Planar Solutions CU10K-3V	Used polishing or electrochemical plating solution
	2	Poly	300	Damaged	100	600	Planar Solutions CU10K-3V	Used polishing or electrochemical plating solution
	6	Poly	300	Damaged	100	1,800	Planar Solutions CU10K-3V	Used polishing or electrochemical plating solution
	2	Poly	300	Damaged	0	0	None	
G	2	Poly	300	Fair	80	480	Wacker Silicone Fluid	Usedelectrochemical plating solution
Vats								
G	1	Steel	700	Poor	80	560	None	Used electrochemical plating solution; possible sludge layer under liquid layer
	1	Steel	700	Damaged	0	0	None	Former plating vat; partially cut up
Aboveground Storage Tanks								
F	1	Poly	2,000	Poor	80	1,600	None	Unknown; brown liquid
	1	Poly	2,000	Poor	30	600	None	Unknown; brown liquid
	1	Poly	2,000	Poor	10	200	None	Unknown; brown liquid
Underground Storage Tank								
H	1	Steel	Unknown	Unknown	Unknown	Unknown	None	Used oil mixed with degreasing solvents
Small Containers								
A	6	Poly	5	Poor	0	0	None	Empty, stained buckets
F	1	Steel	1	Poor	10	0.1	None	Oil or other liquid waste
H	1	Steel	1	Poor	100	1	Paint thinner	Paint thinner
	1	Steel	5	Poor	100	5	None	Unknown
	3	Steel	1	Poor	100	3	Paint	Latex-based paint
	3	Steel	5	Poor	100	15	None	Unknown
	4	Steel	5	Poor	100	20	None	Unknown

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Table 1
Container Inventory
B&R Custom Chrome Site
Toledo, Lucas County, Ohio

Inventory Area [1]	No. of Containers	Container Type	Size (Gallons)	Condition	Percent Full	Total Volume (Gallons)	Labeling or Markings	Suspected Contents and Other Comments
Transformers								
H	4	Steel	35	Poor	2	2.8	None	Surrounding floor and walls stained with dark liquids, suggesting transformer oil may have drained onto floor; yellowish-brown oil in bottom of each transformer
Fluorescent Light Ballasts								
C	8	Glass	-	Fair	-	-	Green end caps	Fluorescent ballasts; 10 feet long
	1	Glass	-	Damaged	-	-	Green end caps	Broken fluorescent ballast; 10 feet long
F	4	Glass	-	Damaged	-	-	Green end caps	Broken fluorescent ballasts; 10 feet long
H	5	Glass	-	Fair	-	-	Green end caps	Fluorescent ballasts; 10 feet long
Cylinders								
F	1	Steel	300 CF	Poor	Unknown	Unknown	Oxygen gas	Oxygen gas
	1	Steel	280 CF	Fair	Unknown	Unknown	Oxygen gas	Oxygen gas
	1	Steel	280 CF	Fair	Unknown	Unknown	Oxygen gas	Oxygen gas
	1	Steel	80 CF	Good	Unknown	Unknown	Oxygen gas	Oxygen gas
	1	Steel	80 CF	Good	Unknown	Unknown	Oxygen gas	Oxygen gas
Super-Sack								
C	1	Nylon	1 CY	Fair	100	1 CY	None	Unknown particulate solid

Notes:

CF = Cubic foot

CY = Cubic yard

Poly = Polyethylene

SU = Standard unit

1 Figure 3 shows the inventory area locations.

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Table 2
Analytical Results
B&R Custom Chrome Site
Toledo, Lucas County, Ohio

Parameter	Analytical Method	Unit	TCLP Regulatory Limit	Sample Identification No.				
				BR-D-H2SO4	BR-VAT1	BR-AST1	BR-UST1	BR-TRANS1
Characteristic								
Flashpoint	SW846-1010	°F	<140	-	>200	>200	>200	-
Corrosivity (pH)	SW846-9041A	pH SUs	<2 or >12.5	**0**	**0**	7	-	-
TCLP Metals								
Arsenic	SW846-6010B	mg/L	5.0	-	<1.0	<0.50	<0.50	-
Barium	SW846-6010B	mg/L	100.0	-	**3.04**	<0.50	<0.50	-
Cadmium	SW846-6010B	mg/L	1.0	-	**10.5**	<0.50	<0.50	-
Chromium	SW846-6010B	mg/L	5.0	-	**535**	<0.50	<0.50	-
Lead	SW846-6010B	mg/L	5.0	-	**71.9**	<0.50	<0.50	-
Mercury	SW846-7470A	mg/L	0.2	-	<0.0050	<0.0050	<0.0050	-
Selenium	SW846-6010B	mg/L	1.0	-	<1.0	<0.50	<0.50	-
Silver	SW846-6010B	mg/L	5.0	-	<10	<0.50	<0.50	-
TCLP VOCs								
Benzene	SW846-8260A	mg/L	0.5	-	<0.10	<0.10	**0.89**	-
Carbon tetrachloride	SW846-8260A	mg/L	0.5	-	<0.10	<0.10	<0.78	-
Chlorobenzene	SW846-8260A	mg/L	100.0	-	<0.10	<0.10	<0.78	-
Chloroform	SW846-8260A	mg/L	6.0	-	<0.10	<0.10	<0.78	-
1,2-Dichloroethane	SW846-8260A	mg/L	0.5	-	<0.10	<0.10	<0.78	-
1,1-Dichloroethene	SW846-8260A	mg/L	0.7	-	<0.10	<0.10	<0.78	-
Methyl ethyl ketone	SW846-8260A	mg/L	200.0	-	<1.0	<1.0	<5.9	-
Tetrachloroethene	SW846-8260A	mg/L	0.7	-	<0.10	<0.10	**4.7**	-
Trichloroethene	SW846-8260A	mg/L	0.5	-	<0.10	<0.10	**0.85**	-
Vinyl chloride	SW846-8260A	mg/L	0.2	-	<0.10	<0.10	<0.78	-
TCLP SVOCs								
1,4 Dichlorobenzene	SW846-8270C	mg/L	7.5	-	<0.050	<0.050	-	-
2,4-Dinitrotoluene	SW846-8270C	mg/L	0.1	-	<0.050	<0.050	-	-
Hexachlorobenzene	SW846-8270C	mg/L	0.1	-	<0.050	<0.050	-	-
Hexachlorobutadiene	SW846-8270C	mg/L	0.5	-	<0.050	<0.050	-	-
Hexachloroethane	SW846-8270C	mg/L	3.0	-	<0.050	<0.050	-	-
Nitrobenzene	SW846-8270C	mg/L	2.0	-	<0.050	<0.050	-	-
Pentachlorophenol	SW846-8270C	mg/L	100.0	-	<0.25	<0.25	-	-
Pyridine	SW846-8270C	mg/L	5.0	-	<0.050	<0.050	-	-
2,4,5-Trichlorophenol	SW846-8270C	mg/L	400.0	-	<0.050	<0.050	-	-
2,4,6-Trichlorophenol	SW846-8270C	mg/L	2.0	-	<0.050	<0.050	-	-

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Table 2
Analytical Results
B&R Custom Chrome Site
Toledo, Lucas County, Ohio

Parameter	Analytical Method	Unit	TCLP Regulatory Limit	Sample Identification No.				
				BR-D-H2SO4	BR-VAT1	BR-AST1	BR-UST1	BR-TRANS1
PCBs								
Aroclor 1016	SW846-8082A	mg/kg	50	-	-	-	<50	<1.0
Aroclor 1221	SW846-8082A	mg/kg	50	-	-	-	<50	<1.0
Aroclor 1232	SW846-8082A	mg/kg	50	-	-	-	<50	<1.0
Aroclor 1242	SW846-8082A	mg/kg	50	-	-	-	<50	<1.0
Aroclor 1248	SW846-8082A	mg/kg	50	-	-	-	<50	<1.0
Aroclor 1254	SW846-8082A	mg/kg	50	-	-	-	<100	<1.0
Aroclor 1260	SW846-8082A	mg/kg	50	-	-	-	<100	**7.2**
Aroclor 1268	SW846-8082A	mg/kg	50	-	-	-	<100	<1.0

Notes:

Bold results indicate detected compounds.

Highlighted results exceed regulatory limits.

- = Not analyzed

°F = Degree Fahrenheit

< = Less than

> = Greater than

mg/kg = Milligram per kilogram

mg/L = Milligram per liter

PCB = Polychlorinated biphenyl

SU = Standard unit

SVOC = Semivolatile organic compound

TCLP = Toxicity Characteristic Leaching Procedure

VOC = Volatile organic compound

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APPENDIX A
PHOTOGRAPHIC DOCUMENTATION

Site: B&R Custom Chrome
Photograph No.: 1 **Date:** 6/13/12
Direction: North **Photographer:** Ryan Green
Subject: B&R Custom Chrome sign on southern side of the former manufacturing building

Site: B&R Custom Chrome
Photograph No.: 2 **Date:** 6/13/12
Direction: East **Photographer:** Ryan Green
Subject: Drum labeled nickel chloride solution in Area B

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Site: B&R Custom Chrome
Photograph No.: 3 **Date:** 6/13/12
Direction: North **Photographer:** Ryan Green
Subject: Fire-damaged and collapsed roof in Area B; open-top tote underneath

Site: B&R Custom Chrome
Photograph No.: 4 **Date:** 6/13/12
Direction: West **Photographer:** Ryan Green
Subject: Open-top totes in fire-damaged Area B

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Site: B&R Custom Chrome
Photograph No.: 5 **Date:** 6/13/12
Direction: East **Photographer:** Ryan Green
Subject: Collapsed section of Area A; containers mixed in the debris

Site: B&R Custom Chrome
Photograph No.: 6 **Date:** 6/13/12
Direction: East **Photographer:** Ryan Green
Subject: Drum marked electrolytic nickel containing rainwater and building debris in Area A

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Site: B&R Custom Chrome
Photograph No.: 7 **Date:** 6/13/12
Direction: East **Photographer:** Ryan Green
Subject: Two 2,000-gallon ASTs containing brown unknown liquid in Area F

Site: B&R Custom Chrome
Photograph No.: 8 **Date:** 6/13/12
Direction: North **Photographer:** Ryan Green
Subject: Drum labeled hydrochloric acid beside ASTs in Area F

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Site: B&R Custom Chrome
Photograph No.: 9 **Date:** 6/13/12
Direction: East **Photographer:** Ryan Green
Subject: Two open-top electrical transformers containing residual oil in Area H

Site: B&R Custom Chrome
Photograph No.: 10 **Date:** 6/13/12
Direction: West **Photographer:** Ryan Green
Subject: Two full 300-gallon totes containing potential polishing or electroplating solutions

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Site: B&R Custom Chrome
Photograph No.: 11 **Date:** 6/13/12
Direction: Southeast **Photographer:** Ryan Green
Subject: A third 2,000-gallon AST located in Area F

Site: B&R Custom Chrome
Photograph No.: 12 **Date:** 6/13/12
Direction: Northeast **Photographer:** Ryan Green
Subject: Unknown liquid staining near cut-top 55-gallon drums in Area F

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Site: B&R Custom Chrome
Photograph No.: 13 **Date:** 6/13/12
Direction: East **Photographer:** Ryan Green
Subject: Unknown liquid staining near 55-gallon drum in Area E

Site: B&R Custom Chrome
Photograph No.: 14 **Date:** 6/13/12
Direction: East **Photographer:** Ryan Green
Subject: Dissolved "concrete foam" leaked from a damaged 55-gallon fiber drum in Area E

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Site: B&R Custom Chrome
Photograph No.: 15 **Date:** 6/13/12
Direction: North **Photographer:** Ryan Green
Subject: Drum labeled muriatic acid in Area E; pH = 0 SU

Site: B&R Custom Chrome
Photograph No.: 16 **Date:** 6/13/12
Direction: East **Photographer:** Ryan Green
Subject: Six 55-gallon drums labeled Shell Tellus Oil 32 in Area G

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Site: B&R Custom Chrome
Photograph No.: 17 **Date:** 6/13/12
Direction: South **Photographer:** Ryan Green
Subject: Two drums labeled sulfuric acid in Area G

Site: B&R Custom Chrome
Photograph No.: 18 **Date:** 6/13/12
Direction: East **Photographer:** Ryan Green
Subject: Eight drums labeled sulfuric acid on pallets in Area G

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Site: B&R Custom Chrome
Photograph No.: 19 **Date:** 6/13/12
Direction: Down **Photographer:** Ryan Green
Subject: Missing bung on a drum labeled sulfuric acid in Area G; pH = 0 SU

Site: B&R Custom Chrome
Photograph No.: 20 **Date:** 6/13/12
Direction: North **Photographer:** Ryan Green
Subject: Vat containing liquid waste; D002, D006, D007, and D008 hazardous waste

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APPENDIX B
DATA VALIDATION REPORT

B&R CUSTOM CHROME
TOLEDO, LUCAS COUNTY, OHIO
DATA VALIDATION REPORT

Date: July 10, 2012
Laboratory: EA Group, Mentor, Ohio
Laboratory Project #: 1206-00216
Data Validation Performed By: Lisa Graczyk, Weston Solutions, Inc. (WESTON) Superfund Technical Assessment and Response Team (START)
Weston Analytical Work Order #/TDD #: 20405.016.001.1875.00/S05-0001-1206-005

This data validation report has been prepared by WESTON START under the START III Region V contract. This report documents the data validation for 5 liquid waste samples collected for the B&R Custom Chrome Site that were analyzed for the following parameters and U.S. Environmental Protection Agency (U.S. EPA) methods:

- Toxicity Characteristic Leaching Procedure (TCLP) Volatile Organic Compounds (VOC) by SW-846 Methods 1311 and 8260A
- TCLP Semivolatile Organic Carbons (SVOC) by SW-846 Methods 1311 and 8270C
- Polychlorinated Biphenyls (PCB) by SW-846 Method 8082
- TCLP Metals by SW-846 Methods 1311, 6010B, and 7470A
- Ignitability by ASTM D93
- Corrosivity by SW-846 Method 9041A

A level II data package was requested from EA Group. The data validation was conducted in general accordance with the U.S. EPA "Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review" dated June 2008 and "Contract Laboratory Program National Functional Guidelines for Inorganic Superfund Data Review" dated January 2010. The Attachment contains the results summary sheets with the hand-written qualifiers applied during data validation.

Data Validation Report
B&R Custom Chrome Site
EA Group
Laboratory Project #: 1206-00216

TCLP VOCs by SW-846 METHODS 1311 AND 8260A

1. Samples

The following table summarizes the samples for which this data validation is being conducted.

Samples	Lab ID	Matrix	Date Collected	Date Analyzed
BR-VAT1	120600216-002	Liquid	6/13/2012	6/20/2012
BR-AST1	120600216-003	Liquid	6/13/2012	6/20/2012
BR-UST1	120600216-004	Liquid	6/13/2012	6/21/2012

2. Holding Times

The samples were analyzed within the required holding time limit of 14 days from sample collection.

3. Blanks

Method blanks were analyzed with the TCLP VOC analyses. The method blanks were free of target compound contamination above the reporting limit.

4. Surrogate Results

The surrogate recovery results were within the laboratory-established quality control (QC) limits.

5. Laboratory Control Sample (LCS) Results

The LCS and LCS duplicate (LCSD) recoveries and relative percent differences (RPD) were within laboratory QC limits.

6. Overall Assessment

The TCLP VOC data are acceptable for use based on the information received.

Data Validation Report
B&R Custom Chrome Site
EA Group
Laboratory Project #: 1206-00216

TCLP SVOCs BY SW-846 METHODS 1311 AND 8270C

1. Samples

The following table summarizes the samples for which this data validation is being conducted.

Samples	Lab ID	Matrix	Date Collected	Date Prepared	Date Analyzed
BR-VAT1	120600216-002	Liquid	6/13/2012	6/20/2012	6/20/2012
BR-AST1	120600216-003	Liquid	6/13/2012	6/20/2012	6/20/2012

2. Holding Times

The samples were analyzed within the required holding time limit of 14 days from sample collection to extraction and 40 days from extraction to analysis for soil samples.

3. Blanks

A method blank was analyzed with the TCLP SVOC analysis. The method blank was free of target compound contamination above the reporting limit.

4. Surrogate Results

The surrogate recoveries were within the laboratory-established QC limits except for as follows.

In one sample, one of the six surrogates was outside QC limits due to potential matrix interference and was not quantitated. No qualifications are required in this instance.

5. LCS Results

The percent recoveries and RPDs for the LCS and LCSD results were within the laboratory-established QC limits for target compounds.

6. Overall Assessment

The TCLP SVOC data are acceptable for use based on the information received.

Data Validation Report
B&R Custom Chrome Site
EA Group
Laboratory Project #: 1206-00216

PCBs BY U.S. EPA SW-846 METHOD 8082

1. Samples

The following table summarizes the samples for which this data validation was conducted.

Samples	Lab ID	Matrix	Date Collected	Date Prepared	Date Analyzed
BR-UST1	120600216-004	Liquid	6/13/2012	6/19/2012	6/20/2012
BR-TRANS1	120600216-005	Liquid	6/13/2012	6/19/2012	6/20/2012

2. Holding Times

The samples were analyzed within the required holding time limit of 14 days from sample collection to extraction and 40 days from extraction to analysis.

3. Blanks

A method blank was analyzed with the PCB analyses. The method blank was free of target compound contamination above the reporting limit.

4. Surrogates

The surrogate recoveries were within QC limits.

5. LCS Results

The LCS and LCSD recoveries and RPDs were within the laboratory-established QC limits.

6. Overall Assessment

The PCB data are acceptable for use based on the information received.

Data Validation Report
B&R Custom Chrome Site
EA Group
Laboratory Project #: 1206-00216

TCLP METALS BY SW-846 METHODS 1311, 6010B, AND 7470A

1. Samples

The following table summarizes the samples for which this data validation is being conducted.

Samples	Lab ID	Matrix	Date Collected	Date Analyzed
BR-VAT1	120600216-002	Liquid	6/13/2012	6/21/2012 – 6/22/2012
BR-AST1	120600216-003	Liquid	6/13/2012	6/21/2012
BR-UST1	120600216-004	Liquid	6/13/2012	6/21/2012

2. Holding Times

The samples were analyzed within the required holding time limit of 28 days from sample collection to analysis for mercury and 180 days from sample collection to analysis for all other metals.

3. Blank Results

Method blanks were analyzed with the TCLP metals analysis. The blanks were free of target analyte contamination above the reporting limits.

4. LCS Results

The LCS recoveries were within the laboratory-established QC limits for target analytes.

5. MS and MSD Results

EA Group analyzed an MS and MSD using a sample from another site; therefore, matrix interferences could not be evaluated using the MD/MSD. For the MS/MSD that was analyzed, the percent recoveries and RPDs were within QC limits.

6. Overall Assessment

The TCLP metals data are acceptable for use based on the information received.

Data Validation Report
B&R Custom Chrome Site
EA Group
Laboratory Project #: 1206-00216

GENERAL CHEMISTRY PARAMETERS (Ignitability by ASTM D93 and Corrosivity by SW-846 Method 9041A)

1. Samples

The following table summarizes the samples for which this data validation is being conducted.

Samples	Lab ID	Matrix	Date Collected	Date Analyzed
BR-D-H2SO4	120600216-001	Liquid	6/13/2012	6/15/2012
BR-VAT1	120600216-002	Liquid	6/13/2012	6/15/2012 – 6/25/2012
BR-AST1	120600216-003	Liquid	6/13/2012	6/15/2012 – 6/25/2012
BR-UST1	120600216-004	Liquid	6/13/2012	6/25/2012

2. Holding Times

There is no specific holding time limit for pH and ignitability. The methods state that the samples should be analyzed as soon as possible. Because these samples were wastes, the holding times were acceptable.

3. Laboratory Duplicate Results

A laboratory duplicate was analyzed with the pH analyses. The duplicate RPD was within QC limits.

4. Overall Assessment

The ignitability and pH data are acceptable for use based on the information received.

ATTACHMENT

EA GROUP
RESULTS SUMMARY WITH QUALIFIERS

EA GROUP

Environmental Analysis and Management

Project Narrative
1206-00216

Data Flag Table

B	The method blank contained a standard laboratory contaminant (Methylene Chloride, Acetone, Hexane, Phthalates, etc.) above the standard laboratory method detection limit. If the analyte is present in the sample at a concentration up to ten times the blank level, the result is reported with a "B" indicating method blank contamination. Samples will be reported without a "B" if the analyte concentration in the sample is greater than ten times the blank level.
E	An analytical result marked with an "E" indicates the result reported is above the high end limit of the calibration curve and should be considered an estimated concentration.
DIL	Due to matrix interference or high analyte concentration, a dilution was required. The spikes and/or surrogates results could not be quantitated and therefore marked "DIL".
J	An analytical result marked with a "J" indicates the result reported was below the standard reporting limit and above the method detection limit. As the observed level approaches the MDL there is an increasing probability of a false positive response.
MI	Analytical results marked as "MI" indicate that due to inherent matrix interference, the result could not be quantitated.
#	Results flagged "#" indicate the reported result may be outside allowable permit levels as provided by the client, when applicable.
NA	A result or field marked as "NA" indicates that it was not applicable for this project.
Q	A quality control result flagged with a "Q" indicates the percent recovery was outside the acceptable range as determined by the laboratory.

** Positive results for this analyte represent a probable combination of 3-Methylphenol (m-Cresol) and 4-Methylphenol (p-Cresol).

EA GROUP
Environmental Analysis and Management

EAG Workorder: 1206-00216

Client Project: BR Custom Chrome

Client ID: BR-D-H2S04 **Date/Time Sampled:** 6/13/2012 / 1540 **Received:** 6/14/2012
EAG ID: 1206-00216-1

Parameter	CAS #	Result	Reporting Limit	Units	Prep Date	Analysis Date	Time	Analyst
pH:SW846-9041A		0		pH units	6/15/2012	6/15/2012		MEF

Client ID: BR-VAT 1 **Date/Time Sampled:** 6/13/2012 / 1525 **Received:** 6/14/2012
EAG ID: 1206-00216-2

Parameter	CAS #	Result	Reporting Limit	Units	Prep Date	Analysis Date	Time	Analyst
Arsenic, TCLP: SW846-6010B	7440-38-2	<1.0	1.0	mg/liter	6/19/2012	6/22/2012		CMB
Barium, TCLP: SW846-6010B	7440-39-3	**3.04**	1.0	mg/liter	6/19/2012	6/22/2012		CMB
Cadmium, TCLP: SW846-6010B	7440-43-9	**10.5**	10	mg/liter	6/19/2012	6/22/2012		CMB
Chromium, TCLP: SW846-6010B	7440-47-3	**535**	100	mg/liter	6/19/2012	6/22/2012		CMB
Lead, TCLP: SW846-6010B	7439-92-1	**71.9**	10	mg/liter	6/19/2012	6/22/2012		CMB
Mercury, TCLP: SW846-7470A	7439-97-6	<0.0050	0.0050	mg/liter	6/21/2012	6/21/2012		CMB
Selenium, TCLP: SW846-6010B	7782-49-2	<1.0	1.0	mg/liter	6/19/2012	6/22/2012		CMB
Silver, TCLP: SW846-6010B	7440-22-4	<10	10	mg/liter	6/19/2012	6/22/2012		CMB
SW846 1311: TCLP Extraction		Complete				6/18/2012		CMB
Flashpoint: ASTM D93		**>200**		degrees F		6/25/2012		REF
pH:SW846-9041A		0		pH units	6/15/2012	6/15/2012		MEF

Client ID: BR-AST 1 **Date/Time Sampled:** 6/13/2012 / 1510 **Received:** 6/14/2012
EAG ID: 1206-00216-3

Parameter	CAS #	Result	Reporting Limit	Units	Prep Date	Analysis Date	Time	Analyst
Arsenic, TCLP: SW846-6010B	7440-38-2	<0.50	0.50	mg/liter	6/19/2012	6/21/2012		CMB
Barium, TCLP: SW846-6010B	7440-39-3	<0.50	0.50	mg/liter	6/19/2012	6/21/2012		CMB
Cadmium, TCLP: SW846-6010B	7440-43-9	<0.50	0.50	mg/liter	6/19/2012	6/21/2012		CMB
Chromium, TCLP: SW846-6010B	7440-47-3	<0.50	0.50	mg/liter	6/19/2012	6/21/2012		CMB
Lead, TCLP: SW846-6010B	7439-92-1	<0.50	0.50	mg/liter	6/19/2012	6/21/2012		CMB
Mercury, TCLP: SW846-7470A	7439-97-6	<0.0050	0.0050	mg/liter	6/21/2012	6/21/2012		CMB
Selenium, TCLP: SW846-6010B	7782-49-2	<0.50	0.50	mg/liter	6/19/2012	6/21/2012		CMB
Silver, TCLP: SW846-6010B	7440-22-4	<0.50	0.50	mg/liter	6/19/2012	6/21/2012		CMB
SW846 1311: TCLP Extraction		Complete				6/18/2012		CMB
Flashpoint: ASTM D93		**>200**		degrees F		6/25/2012		REF
pH:SW846-9041A		7		pH units	6/15/2012	6/15/2012		MEF

EA GROUP
Environmental Analysis and Management

EAG Workorder: 1206-00216

Client Project: BR Custom Chrome

Client ID: BR-UST 1 **Date/Time Sampled:** 6/13/2012 / 1610 **Received:** 6/14/2012

EAG ID: 1206-00216-4

Parameter	CAS #	Result	Reporting Limit	Units	Prep Date	Analysis Date	Time	Analyst
Arsenic, TCLP: SW846-6010B	7440-38-2	<0.50	0.50	mg/liter	6/19/2012	6/21/2012		CMB
Barium, TCLP: SW846-6010B	7440-39-3	<0.50	0.50	mg/liter	6/19/2012	6/21/2012		CMB
Cadmium, TCLP: SW846-6010B	7440-43-9	<0.50	0.50	mg/liter	6/19/2012	6/21/2012		CMB
Chromium, TCLP: SW846-6010B	7440-47-3	<0.50	0.50	mg/liter	6/19/2012	6/21/2012		CMB
Lead, TCLP: SW846-6010B	7439-92-1	<0.50	0.50	mg/liter	6/19/2012	6/21/2012		CMB
Mercury, TCLP: SW846-7470A	7439-97-6	<0.0050	0.0050	mg/liter	6/21/2012	6/21/2012		CMB
Selenium, TCLP: SW846-6010B	7782-49-2	<0.50	0.50	mg/liter	6/19/2012	6/21/2012		CMB
Silver, TCLP: SW846-6010B	7440-22-4	<0.50	0.50	mg/liter	6/19/2012	6/21/2012		CMB
SW846 1311: TCLP Extraction		Complete				6/18/2012		CMB
Flashpoint: ASTM D93		**>200**		degrees F		6/25/2012		REF

EA GROUP
Environmental Analysis and Management

EAG Workorder 1206-00216
EAG ID: 1206-00216-002
Client ID: BR-VAT 1
Client Project: BR Custom Chrome

Matrix: Liquid
Analyst: DFM

Date Sampled: 06/13/2012
Time Sampled: 1525
Date Received: 06/14/2012

Parameter	CAS #	Result	Reporting Limit	Units	Date Analyzed
Semi-volatile Organic TCLP: SW846-8270C					
o-Cresol	95-48-7	<0.050	0.050	mg/liter	6/20/2012
m & p-Cresol	1319-77-3	<0.050	0.050	mg/liter	6/20/2012
1,4-Dichlorobenzene	106-46-7	<0.050	0.050	mg/liter	6/20/2012
2,4-Dinitrotoluene	121-14-2	<0.050	0.050	mg/liter	6/20/2012
Hexachlorobenzene	118-74-1	<0.050	0.050	mg/liter	6/20/2012
Hexachlorobutadiene	87-68-3	<0.050	0.050	mg/liter	6/20/2012
Hexachloroethane	67-72-1	<0.050	0.050	mg/liter	6/20/2012
Nitrobenzene	98-95-3	<0.050	0.050	mg/liter	6/20/2012
Pentachlorophenol	87-86-5	<0.25	0.25	mg/liter	6/20/2012
Pyridine	110-86-1	<0.050	0.050	mg/liter	6/20/2012
2,4,5-Trichlorophenol	95-95-4	<0.050	0.050	mg/liter	6/20/2012
2,4,6-Trichlorophenol	88-06-2	<0.050	0.050	mg/liter	6/20/2012
Extraction: SW846-3510C		Complete			6/20/2012
TCLP Extraction: SW846-1311		Complete			6/18/2012

Surrogate	Percent Recovery	Recovery Limits
Nitrobenzene-d5	65.1	(35 - 114)
2-Fluorobiphenyl	64.3	(43 - 116)
p-Terphenyl-d14	74.3	(33 - 141)
2-Fluorophenol	31.1	(21 - 100)
Phenol-d6	29.5	(10 - 94)
2,4,6-Tribromophenol	106	(10 - 123)

EA GROUP
Environmental Analysis and Management

EAG Workorder 1206-00216
EAG ID: 1206-00216-002
Client ID: BR-VAT 1
Client Project: BR Custom Chrome

Matrix: Liquid
Analyst: REC

Date Sampled: 06/13/2012
Time Sampled: 1525
Date Received: 06/14/2012

Parameter	CAS #	Result	Reporting Limit	Units	Date Analyzed
Volatile Organic TCLP: SW846-8260A					
Benzene	71-43-2	<0.10	0.10	mg/liter	6/20/2012
Carbon tetrachloride	56-23-5	<0.10	0.10	mg/liter	6/20/2012
Chlorobenzene	108-90-7	<0.10	0.10	mg/liter	6/20/2012
Chloroform	67-66-3	<0.10	0.10	mg/liter	6/20/2012
1,2-Dichloroethane	107-06-2	<0.10	0.10	mg/liter	6/20/2012
1,1-Dichloroethene	75-35-4	<0.10	0.10	mg/liter	6/20/2012
Methyl ethyl ketone	78-93-3	<1.0	1.0	mg/liter	6/20/2012
Tetrachloroethene	127-18-4	<0.10	0.10	mg/liter	6/20/2012
Trichloroethylene	79-01-6	<0.10	0.10	mg/liter	6/20/2012
Vinyl chloride	75-01-4	<0.10	0.10	mg/liter	6/20/2012
ZHE TCLP Extraction:SW846-1311		Complete			6/19/2012

Surrogate	Percent Recovery	Recovery Limits
1,2-Dichloroethane-d4	135	(62 - 137)
Toluene-d8	106	(81 - 126)
4-Bromofluorobenzene	126	(80 - 128)

EA GROUP
Environmental Analysis and Management

EAG Workorder 1206-00216
EAG ID: 1206-00216-003
Client ID: BR-AST 1
Client Project: BR Custom Chrome

Matrix: Liquid
Analyst: DFM

Date Sampled: 06/13/2012
Time Sampled: 1510
Date Received: 06/14/2012

Parameter	CAS #	Result	Reporting Limit	Units	Date Analyzed
Semi-volatile Organic TCLP: SW846-8270C					
o-Cresol	95-48-7	<0.050	0.050	mg/liter	6/20/2012
m & p-Cresol	1319-77-3	<0.050	0.050	mg/liter	6/20/2012
1,4-Dichlorobenzene	106-46-7	<0.050	0.050	mg/liter	6/20/2012
2,4-Dinitrotoluene	121-14-2	<0.050	0.050	mg/liter	6/20/2012
Hexachlorobenzene	118-74-1	<0.050	0.050	mg/liter	6/20/2012
Hexachlorobutadiene	87-68-3	<0.050	0.050	mg/liter	6/20/2012
Hexachloroethane	67-72-1	<0.050	0.050	mg/liter	6/20/2012
Nitrobenzene	98-95-3	<0.050	0.050	mg/liter	6/20/2012
Pentachlorophenol	87-86-5	<0.25	0.25	mg/liter	6/20/2012
Pyridine	110-86-1	<0.050	0.050	mg/liter	6/20/2012
2,4,5-Trichlorophenol	95-95-4	<0.050	0.050	mg/liter	6/20/2012
2,4,6-Trichlorophenol	88-06-2	<0.050	0.050	mg/liter	6/20/2012
Extraction: SW846-3510C		Complete			6/20/2012
TCLP Extraction: SW846-1311		Complete			6/18/2012

Surrogate	Percent Recovery	Recovery Limits
Nitrobenzene-d5	48.5	(35 - 114)
2-Fluorobiphenyl	42.8	(43 - 116)
p-Terphenyl-d14	40.9	(33 - 141)
2-Fluorophenol	MI	(21 - 100)
Phenol-d6	11.8	(10 - 94)
2,4,6-Tribromophenol	71.2	(10 - 123)

EA GROUP
Environmental Analysis and Management

EAG Workorder 1206-00216
EAG ID: 1206-00216-003
Client ID: BR-AST 1
Client Project: BR Custom Chrome

Matrix: Liquid
Analyst: REC

Date Sampled: 06/13/2012
Time Sampled: 1510
Date Received: 06/14/2012

Parameter	CAS #	Result	Reporting Limit	Units	Date Analyzed
Volatile Organic TCLP: SW846-8260A					
Benzene	71-43-2	<0.10	0.10	mg/liter	6/20/2012
Carbon tetrachloride	56-23-5	<0.10	0.10	mg/liter	6/20/2012
Chlorobenzene	108-90-7	<0.10	0.10	mg/liter	6/20/2012
Chloroform	67-66-3	<0.10	0.10	mg/liter	6/20/2012
1,2-Dichloroethane	107-06-2	<0.10	0.10	mg/liter	6/20/2012
1,1-Dichloroethene	75-35-4	<0.10	0.10	mg/liter	6/20/2012
Methyl ethyl ketone	78-93-3	<1.0	1.0	mg/liter	6/20/2012
Tetrachloroethene	127-18-4	<0.10	0.10	mg/liter	6/20/2012
Trichloroethylene	79-01-6	<0.10	0.10	mg/liter	6/20/2012
Vinyl chloride	75-01-4	<0.10	0.10	mg/liter	6/20/2012
ZHE TCLP Extraction:SW846-1311		Complete			6/19/2012

Surrogate	Percent Recovery	Recovery Limits
1,2-Dichloroethane-d4	135	(62 - 137)
Toluene-d8	104	(81 - 126)
4-Bromofluorobenzene	127	(80 - 128)

EA GROUP
Environmental Analysis and Management

EAG Workorder 1206-00216
EAG ID: 1206-00216-004
Client ID: BR-UST 1
Client Project: BR Custom Chrome

Matrix: Liquid
Analyst: JAH

Date Sampled: 06/13/2012
Time Sampled: 1610
Date Received: 06/14/2012

Parameter	CAS #	Result	Reporting Limit	Units	Date Analyzed
Polychlorinated Biphenyls: SW846-8082A					
Aroclor 1016	12674-11-2	<50	50	mg/kg	6/20/2012
Aroclor 1221	11104-28-2	<50	50	mg/kg	6/20/2012
Aroclor 1232	11141-16-5	<50	50	mg/kg	6/20/2012
Aroclor 1242	53469-21-9	<50	50	mg/kg	6/20/2012
Aroclor 1248	12672-29-6	<50	50	mg/kg	6/20/2012
Aroclor 1254	11097-69-1	<100	100	mg/kg	6/20/2012
Aroclor 1260	11096-82-5	<100	100	mg/kg	6/20/2012
Aroclor 1268	11100-14-4	<100	100	mg/kg	6/20/2012
Extraction: SW846-3580		Complete			6/19/2012

Surrogate	Percent Recovery	Recovery Limits
Tetrachloro-m-xylene	92.1	(59 - 127)
Decachlorobiphenyl	70.8	(64 - 134)

EA GROUP
Environmental Analysis and Management

EAG Workorder 1206-00216
EAG ID: 1206-00216-004
Client ID: BR-UST 1
Client Project: BR Custom Chrome

Matrix: Liquid
Analyst: REC

Date Sampled: 06/13/2012
Time Sampled: 1610
Date Received: 06/14/2012

Parameter	CAS #	Result	Reporting Limit	Units	Date Analyzed
Volatile Organic TCLP: SW846-8260A					
Benzene	71-43-2	**0.89**	0.78	mg/liter	6/21/2012
Carbon tetrachloride	56-23-5	<0.78	0.78	mg/liter	6/21/2012
Chlorobenzene	108-90-7	<0.78	0.78	mg/liter	6/21/2012
Chloroform	67-66-3	<0.78	0.78	mg/liter	6/21/2012
1,2-Dichloroethane	107-06-2	<0.78	0.78	mg/liter	6/21/2012
1,1-Dichloroethene	75-35-4	<0.78	0.78	mg/liter	6/21/2012
Methyl ethyl ketone	78-93-3	<5.9	5.9	mg/liter	6/21/2012
Tetrachloroethene	127-18-4	**4.7**	0.78	mg/liter	6/21/2012
Trichloroethylene	79-01-6	**0.85**	0.78	mg/liter	6/21/2012
Vinyl chloride	75-01-4	<0.78	0.78	mg/liter	6/21/2012
ZHE TCLP Extraction:SW846-1311		Complete			6/19/2012

Surrogate	Percent Recovery	Recovery Limits
1,2-Dichloroethane-d4	129	(62 - 137)
Toluene-d8	105	(81 - 126)
4-Bromofluorobenzene	117	(80 - 128)

EA GROUP
Environmental Analysis and Management

EAG Workorder 1206-00216
EAG ID: 1206-00216-005
Client ID: BR-TRANS 1
Client Project: BR Custom Chrome

Matrix: Liquid
Analyst: JAH

Date Sampled: 06/13/2012
Time Sampled: 1558
Date Received: 06/14/2012

Parameter	CAS #	Result	Reporting Limit	Units	Date Analyzed
Polychlorinated Biphenyls: SW846-8082A					
Aroclor 1016	12674-11-2	<1.0	1.0	mg/kg	6/20/2012
Aroclor 1221	11104-28-2	<1.0	1.0	mg/kg	6/20/2012
Aroclor 1232	11141-16-5	<1.0	1.0	mg/kg	6/20/2012
Aroclor 1242	53469-21-9	<1.0	1.0	mg/kg	6/20/2012
Aroclor 1248	12672-29-6	<1.0	1.0	mg/kg	6/20/2012
Aroclor 1254	11097-69-1	<1.0	1.0	mg/kg	6/20/2012
Aroclor 1260	11096-82-5	**7.2**	1.0	mg/kg	6/20/2012
Aroclor 1268	11100-14-4	<1.0	1.0	mg/kg	6/20/2012
Extraction: SW846-3580		Complete			6/19/2012

Surrogate	Percent Recovery	Recovery Limits
Tetrachloro-m-xylene	87.1	(59 - 127)
Decachlorobiphenyl	86.8	(64 - 134)