SEMS-RM DOCID # 1164177

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

MEMORANDUM

DATE: April 16, 1992

SUBJECT: Request for a Removal Action at the King Neptune Lead Site, City of Bell Gardens, Los Angeles County, California

FROM: Daniel M. Shane, OSC, Emergency Response Section

TO: Jeffrey Zelikson, Director, Hazardous Waste Management Division

THRU: Donald White, Chief, Field Operations Branch

THRU: Terry Brubaker, Chief, Emergency Response Section

I. PURPOSE

The purpose of this Action Memo is to request and document approval of the proposed removal action described herein for the King Neptune Lead Site located at 6612 Clara Street, City of Bell Gardens, California.

II. SITE CONDITIONS AND BACKGROUND

Site Status: Non-NPL
Category of Removal: Time-Critical
CERCLIS ID: CAD983623786
SITE ID: 3B

A. Site Description

1. Removal site evaluation

King Neptune Industries (the "Company") has operated a lead smelter at 6612 Clara Street in Bell Gardens, California (the "Property") since 1955. The lead smelting operations are conducted inside a large building in the backyard of a single

family residence. The Company has never obtained a permit to operate the lead smelter from the South Coast Air Quality Management District or used any air emission controls on the smelter.

The Company obtains most of its lead for smelting in the form of "lead pigs" from hospitals and medical centers. Lead pigs are used by hospitals and medical centers to store and transport radioactive isotopes for cancer treatment and radiation diagnosis. Additional sources of lead for smelting include automotive wheel weights and scrap batteries. Molten lead was used by the Company to make SCUBA diving weights and lead fishing weights.

As a result of the lead smelting activities, the large building and the Property's soils are heavily contaminated with lead. Lead contamination in the alley and parkway near the facility indicates that off-site migration is a problem. In December 1991, the County Fire Department condemned or "red-tagged" the smelter for violations of the Uniform Fire Code. In violation of the red-tag order, the Company continues to operate the smelter on a sporadic basis.

2. Physical location

The Property is located in a mixed commercial and residential area in the city of Bell Gardens, Los Angeles County, California . Bell Gardens is a very densely populated city. There is an estimated population of 42,000 within a 2.45 square mile area. There are single family residences and an apartment complex bordering the Property. A public school and park are located within 0.25 mile of the Property. An alley is located near the entrance to the Property. An apartment complex and a potato packing plant border the alley. A parkway borders Clara Street.

3. Site characteristics

The Site consists of the Property at 6612 Clara Street as well as off-site areas that have been affected by contaminant migration. The Property is approximately 0.25 acres of land within a residential neighborhood. On the Property there is a house, a large building (smelter building) and a smaller, detached garage. The smelter building, garage and a vacant yard are located behind the house. There is a concrete patio in front of the smelter building and an iron gate entrance that leads to the alley.

The King Neptune lead smelting operation occurs inside the smelter building. Surfaces inside of the building are covered with lead dust in concentrations exceeding 500,000 ppm. This lead concentration is well above the state regulatory level of

1,000 ppm for defining a waste as hazardous. The combination of fume emissions from the lead smelter and the grinding and polishing of the finished lead products are the primary sources of the contamination. The smelter consists of a melting pot, natural gas furnace and flue pipe. The building is extremely cluttered with drums containing lead dross, used sanding belts, furniture, large appliances, trash and debris.

The patio is also cluttered with remnants of smelting equipment and drums of trash and debris. Although the operator had recently hosed down and washed the patio, piles of lead dust on the patio remain under a plastic awning. High levels of lead (up to 11,000 ppm) were found on the patio, in the alley and along the street. This establishes a drainage pathway for off-site contaminant migration which ultimately discharges to the storm sewer.

The Property is surrounded by a four foot high metal fence. The Property does not appear directly accessable by the general public. However, children could easily climb the fence or come into contact with site soils near the fenceline. The four individuals who live at the Property are currently exposed to fugitive lead dust.

Although the Company's California Radioactive Materials License for receipt of the lead pigs used to store radioactive medicines was terminated in 1985, the Company continued to obtain the lead pigs from hospitals and medical centers. On December 19, 1991, the Los Angeles County Department of Health Services ("LACDHS") Radiologic Management Branch (RMB) conducted an extensive radiation survey. The results of the radiation survey revealed no radiation hazards.

4. Release or threatened release into the environment of a hazardous substance, or pollutant or contaminant

On January 23, 1984, LACDHS conducted a site investigation and collected soil samples from the backyard (on-site) and along the fenceline in the alleyway (off-site). The sampling results revealed elevated levels of lead in the yard at 38,000 mg/kg and the alley at 1,250 mg/kg. The site was sampled again on April 05, 1985 and December 19, 1991. The sampling results confirmed lead contamination as high as 128,000 mg/kg in the smelter building and 48,000 mg/kg in the backyard.

On March 05 and 18, 1992, the EPA conducted a preliminary assessment (PA). A total of 26 samples were collected from on-site and off-site locations. The sampling results confirmed that the building was highly contaminated with lead (up to 547,000 mg/kg). Surface soil lead contamination was as high as 5,900 mg/kg in the backyard, 11,000 mg/kg in the alley and 6,000 mg/kg in the parkway alongside the street.

A total of 7 of 10 surface soil samples collected during the PA from the backyard exceeded the California Total Threshold Level Concentration (TTLC) for lead. The TTLC is a state standard used to designate when a substance containing lead is a hazardous waste. This TTLC for lead is set at 1,000 mg/kg.

The Federal On-Scene Coordinator ("FOSC") has notified the Agency for Toxic Substances and Disease Registry (ATSDR) of elevated lead levels in this residential community. The ATSDR will assist the FOSC in assessing the potential threats to public health posed by the lead contamination.

5. NPL status

This Site is not on the NPL. This Site should not require long-term remediation.

6. Maps, pictures and other graphic representations

In Attachment A, Figure 1 is a map of the location of the site and Figure 2 is a site map with sampling locations. Attachment B contains laboratory data from both the LACDHS (Table 1) and EPA preliminary assessments (Table 2).

B. Other Actions to Date

1. Previous Actions

All previous EPA actions have been discussed in Section A. The local agencies have indicated that the responsible parties have not taken any actions to mitigate the site hazards.

2. Current Actions

The TAT contractor is currently developing a Quality Assurance Sampling Plan for an expanded (phase II) assessment. This plan will address the extent of soil lead contamination on-site as well as off-site. In addition, several residences in the immediate area will be sampled to determine whether there are hazardous levels of lead dust in the houses.

C. State and Local Authorities's Roles

1. State and local actions to date

The LACDHS has documented a long history of hazardous waste violations and compliance problems first identified in 1984 and continued unabated up to the present.

During this 8 year period, the LACDHS conducted compliance inspections in 1984, 1985, 1988 and 1991. These inspections documented lead contamination on the site property as well as

outside the property fenceline.

The LACDHS issued the Company a Notice of Violation (NOV) in April 1985 and directed the operator to discontinue illegal discharges of lead to the environment and dumping lead wastes into the trash dumpster. LACDHS issued a second NOV in July 1985 and directed the operator to discontinue all operations and submit a clean-up plan for decontaminating the building and removing contaminated soils. The operator failed to comply with the directive to cease operations and clean-up the site. LACDHS issued a third NOV in December 1991. At that time, the County Fire Department "red-tagged" the smelter. There is no indication that the Company has responded in any way to the NOVs.

On January 29, 1992, the LACDHS Hazmat contacted the FOSC, Daniel Shane, and requested assistance from the EPA to conduct an assessment of the hazards posed by the lead contamination.

2. Potential for continued State/local response

Neither the State nor local agencies have sufficient funds to perform stabilization and cleanup activities. The cost of these actions is well beyond the capabilities of the State Emergency Reserve Account to fund such actions.

The LACDHS and City officials have a high level of concern about the site contamination. They support and will assist EPA, to the extent of their available resources, in mitigating the site hazards.

The City of Bell Gardens has begun the process of developing a demolition order which will authorize the City to condemn and destroy the smelter building and its contents.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

A. Threats to Public Health or Welfare

There is a direct hazard to the public due to the high concentrations of lead at this Site. Due to the close proximity of this Site to a residential neighborhood, there is a high potential for human exposure to hazardous levels of lead. Young children live in the house and apartment complex next door to the Property. The people living at and near this Site can be exposed to lead by inhaling lead dust particulates or ingesting dust or dirt that contains lead.

According to the Agency for Toxic Substances and Disease Registry (ATSDR), Draft "Toxicological Profile For Lead" U.S. Public Health Service,

"Exposure to lead is particularly dangerous for the fetus, because of its great sensitivity during development. Exposure to lead is also dangerous for young children, because they ingest more lead through normal mouthing activity, absorb more of the lead they ingest, and are more sensitive to its effects. Exposure of a mother to lead results in the transfer of lead to the fetus and may cause preterm birth, reduced birth weight, and decreased intelligence quotient (IQ) scores and reduce the growth of young children".

"Lead exposure may increase blood pressure in middle-aged men. At high levels of exposure, lead can severely damage the brain and kidneys in adults or children. In addition, high levels of exposure to lead will cause abortion and damage the male reproductive system. The effects of lead are the same regardless of whether it enters the body through breathing or ingestion".

Lead is a hazardous substance as defined in CERCLA Section 101(14). Pursuant to Section 300.415 (b)(2) of the National Contingency Plan (NCP) the following conditions necessary for initiating a removal action exist:

1. Actual or potential exposure to hazardous substances or pollutants or contaminants by nearby populations or the food chain

There presently exists a direct contact threat to the family living in the house as well as an off-site threat to the people living nearby. Lead-contaminated soils can be carried off the immediate property by wind and surface water runoff. Lead can be absorbed by inhaling lead dust particulates, or by eating contaminated soil. The young children who live nearby have a greater potential for exposure to lead since they ingest more soil than adults through normal mouthing activities.

2. High levels of hazardous substances or pollutants or contaminants in soils at or near the surface, that may migrate

Soil sampling at and near the Site has revealed lead concentrations that greatly exceed the State of California's definition of a hazardous waste. Presently, the soils are subject to movement through windy and rainy weather. There is evidence that highly contaminated lead dust and dirt from inside the smelter building has been tracked, dumped or otherwise dispersed outside the building.

The potential for migration is evident from the high levels of lead detected in the patio area, the alley and parkway adjoining the street. This drainage pathway directs surface water runoff to the street and storm sewer. The storm sewer empties into the Rio Hondo River which flows into the Los Angeles River and, ultimately, into the Pacific Ocean.

The facility operator continues to disregard orders to cease operations. There are no air pollution control devices on the smelter to control releases of lead-contaminated smoke and ash.

3. Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released

The exterior yard has barren soils and sparse vegetation. High winds could disperse contamination into neighboring residential properties. Heavy rainfall could cause localized flooding resulting in contaminated runoff onto adjacent properties, the streets and into storm sewers.

4. Availability of other appropriate Federal or State response mechanisms to respond to the release

The State has informed the OSC that they are unable to conduct site stabilization or other responses for the foreseeable future.

B. Threats to the Environment

The primary threat is to public health. The threat that could most adversely affect the environment is the release of contaminants to drainage pathways that lead to the Rio Hondo River via the storm sewer. This represents a potential for degradation of surface water resources.

IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances from this Site, if not addressed by implementing the response action selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, or welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed action description

The objective of the action is to abate the imminent public health and environmental threat by stabilizing and removing hazardous levels of lead from on-site soils and structures. In addition, lead contamination will be removed from off-site areas that were contaminated as a result of the lead smelting activities. It is anticipated that the removal action will achieve the cleanup goal of 500 ppm lead in soils.

The removal action will be conducted in five phases and will address: (1) the lead contamination within the smelter building;

(2) the lead-contaminated soils on the facility property; (3) lead-contaminated soil "hot-spot" areas beyond the property line; (4) lead contamination in houses near the facility; and (5) transportation and disposal of hazardous wastes.

The following removal activities are planned:

Phase 1 - Smelter Building

- Construct a containment to protect people from dust emissions.

- Remove equipment and other materials from the building to provide access to areas of contamination. This task may require the decontamination of materials prior to removal. Due to the limited space to conduct removal activities, unsalvageable materials may have to be disposed of as hazardous or solid waste.

- Remove and containerize dust and dirt on the surfaces of the building. This can be accomplished by using a HEPA vaccum, misting debris with water and sweeping it up, and washing with a high phosphate detergent.

- Decontaminate the building. If, in the judgement of the OSC, decontamination is not feasible, the smelter building may have to be demolished. If demolition is required, there is an estimated 500 cubic yards of building construction debris and 100 cubic yards of indoor debris.

Phase 2 - Lead-contaminated soils on the Property

- Excavate and remove soils that contain hazardous levels of lead exceeding the cleanup standard. The extent of the soil cleanup on the Property depends on the results of the phase II assessment. It is estimated that 100 to 200 cubic yards of soil will be removed.

Phase 3 - Lead-contaminated soil "hotspots" beyond the Property

- Excavate and remove soils that contain hazardous levels of lead. Hotspot areas have been identified along the borders of the alley and in the parkway. It is estimated that 10 to 20 cubic yards will be removed from these areas. The extent of cleanup on adjacent properties depends on the results of the phase II assessment. The data from the initial assessment suggests that off-site contamination is not extensive.

Phase 4 - Lead contamination inside houses

- Conduct lead abatement activities to clean-up hazardous lead dust inside the houses. The extent of cleanup inside the houses depends on the results of the phase II assessment. Initially, six houses located near the Site will be tested for lead

contamination. Additional houses will be tested, if necessary.

Phase 5 - Transportation and disposal

- Research all available recycling options. The high concentration of lead dust from the smelter building, lead pigs, lead bricks, etc can be recycled to an EPA-approved secondary lead smelter.

- Evaluate several potential stabilization and clean-up technologies for lead-contaminated soils. These will include innovative technologies such as cement fixation and soil washing and conventional methods such as capping and landfilling. Based on several factors (small size of the site, low volume of waste, proximity to residents), off-site stabilization and land disposal appears to be the most practical option. Lead-contaminated soils would be loaded into bins and transported in bulk to a permitted hazardous waste landfill. The landfill facility would stabilize the soils prior to burial. Usually a cement-based fixation process is used by the landfill facility to meet the treatment standards for lead-contaminated soils. The soil must pass the TCLP or EP Toxicity in accordance with the RCRA Land Ban Restrictions.

Additional site activities:

- Provide 24-hr security during removal operations.
- Perform air monitoring activities in accordance with OSHA requirements during all phases of the removal action, especially when there is a potential for airborne release of lead contaminants.
- Perform dust suppression activities to control the airborne release of lead-contaminated dust beyond the property boundaries.
- Utilize x-ray fluorescence (XRF) spectrometry for field analysis of lead levels in soils. This use of this instrument to quantify lead concentrations in soil samples will substantially reduce analytical costs. Other matrices may be tested using the XRF (i.e., contaminated wood, concrete, etc.)
- Consult with the EPA toxicologist on the adequacy of cleanup during phases 1-4.
- Develop a community/media relations plan

2. Contribution to remedial performance

There is currently no federal, state or local long-term remediation plan for this site. The proposed removal action should result in a permanent remedy. Therefore, long-term remedial action should not be necessary. It is anticipated that all hazardous materials and contaminated soils will be removed from the Site.

3. Description of alternative technologies

The use of innovative in-situ stabilization technologies may not be feasible at this site. The limitations associated with applying these technologies are:

(1) the areas of contamination are too small and constrictive to conduct efficient stabilization activities;
(2) the quantity of waste is too low for stabilization technology to be cost effective;
(3) Stabilization technologies can create hazards and disturbances that may not be justifiable in a residential setting;
(4) the future integrity of the stabilized mass on a residential lot cannot be reasonably guaranteed.

5. Applicable or Relevant and Appropriate Requirements (ARARs) or To Be Considered Criteria (TBCs)

On-site removal actions are required to attain ARARs to the extent practicable, considering the exigencies of the situation. In addition, EPA may consider federal and state advisories, guidance or non-promulgated criteria in selecting a cleanup standard if there is no ARAR or if the ARAR is not sufficiently protective of human health or the environment.

Clean-up Standard

Under State regulations, lead-contaminated soils are defined hazardous wastes if the TTLC is 1,000 ppm or greater as set forth in the Title 22 Regulations implementing the Hazardous Waste Control Law. This is not a State clean-up standard. Although there is not a federal ARAR which sets a clean-up standard for lead-contaminated soils, EPA considered the following federal TBCs in selecting the appropriate clean-up standard:

1) Interim Guidance On Establishing Soil Lead Cleanup Levels At Superfund Sites, OSWER Directive #9355.4-02, 09/01/89. Sets forth an interim soil cleanup level for total lead at 500 to 1,000 ppm; and
(2) Center for Disease Control Preventing Lead Poisoning in Young Children, October 1991. This guidance document sets forth procedures for testing and abating lead contamination in homes.

Based on EPA's consideration of these TBCs, EPA has selected the most protective standard of 500 ppm as the cleanup standard for the lead-contaminated soils at the Site because the Site is in a residential neighborhood. The removal action will attain this cleanup standard and therefore will meet the less stringent State ARAR.

Disharge of Decontamination Water

In addition, the removal action shall comply with the State and Federal ARARs for any discharge of decontamination water to the sanitary sewer located on-site. The ARARs for such discharge are the Pretreatment Standards set forth in 40 CFR Part 403 and the local POTW limitations which implement the federal Pretreatment Standards.

Land Disposal Requirements

Lead-contaminated substances at this site are hazardous wastes under the Resource Conservation and Recovery Act because they exhibit the characteristic of toxicity under 40 CFR 261.24. The EPA hazardous waste number for this category of waste is D008. Under 40 CFR 268.40 and 268.41, the treatment standard prior to land disposal for D008 waste is 5.0 mg/l based on the TCLP or EP Toxicity methods. The treatment standard of 5.0 mg/l is the ARAR for lead-contaminated wastes that are placed on-site and is an applicable requirement for D008 wastes that are sent to an off-site disposal facility. The removal action will comply with this applicable requirement unless a treatability variance is obtained.

6. Project schedule

The phase II assessment will require 4 weeks to complete. The schedule for the phase II assessment is as follows:

April 6-10, develop an XRF model for site-specific analysis.
April 6-15, develop a Quality Assurance Sampling Plan.
April 16-22, conduct the sampling work
April 23-30, perform the laboratory analysis
May 4, conduct a pre-removal site visit with ERCS

The removal action is scheduled to commence on May 11, 1992. The removal action is expected to take 4 weeks to complete.

B. Estimated Costs

Continued on the following page.

B. Estimated Costs

Cost Projection Scenario

Projection ID No.: 3B
Cleanup Contractor: CET

Date: 4-9-92
TAT Contractor: E&E

Cost Projection Summary

Contractor Personnel	$ 162,000.00
Contractor Equipment	$ 16,000.00
At Cost Materials	$ 28,000.00
Subcontractors	$ 39,000.00
Waste Transportation	$ 27,000.00
Waste Disposal	$ 60,000.00
Cleanup Contractor Subtotal	$ 332,000.00
Federal and State Agencies	$ 25,000.00
Extramural Subtotal	$ 357,000.00
Extramural Contingency (20%)	$ 72,000.00
Extramural Subtotal	$ 429,000.00
TAT Personnel	$ 88,000.00
Extramural Subtotal	$ 517,000.00
Project Contingency (15%)	$ 78,000.00
Total Extramural Cost	$ 595,000.00
EPA Regional Personnel	$ 33,000.00
EPA Indirect	$ 17,000.00
EPA Total	$ 50,000.00
Project Total	$ 645,000.00

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

If the removal action is not performed, lead contamination will continue to migrate to adjacent properties. The families living in close proximity to the site contamination are presently at risk of exposure to high levels of lead, especially the children.

VII. OUTSTANDING POLICY ISSUES

Selection of a residential soil cleanup level for lead, for a CERCLA removal site, that is greater than or less than EPA's recommended interim range of 500-1,000 ppm is considered a nationally significant or precedent-setting issue for the Superfund program. Selection of a cleanup goal outside this range would require approval from EPA Headquarters. Since the cleanup standard selected for this site is 500 ppm, there are no precedent-setting issues to resolve.

VIII. ENFORCEMENT

The Enforcement Addendum to this Action Memo contains confidential enforcement information.

IX. RECOMMENDATION

This decision document represents the selected removal action for the King Neptune Lead site, in the City of Bell Gardens, developed in accordance with CERCLA as amended, and is not inconsistent with the NCP. This decision is based on the administrative record for the site.

Conditions at the site meet the NCP section 300.415(b)(2) criteria for a removal and I recommend your approval of the proposed removal action. The total project ceiling if approved will be $645,000.00. Of this, an estimated $429,000.00 comes from the Regional removal allowance.

Keith Takata for JZ — 4-21-92

Approval Signature — Date

Disapproval Signature — Date

FX-5 Agency Communications

[redacted]

FX-5 Agency Communications

[redacted]

FX-5 Agency Communications

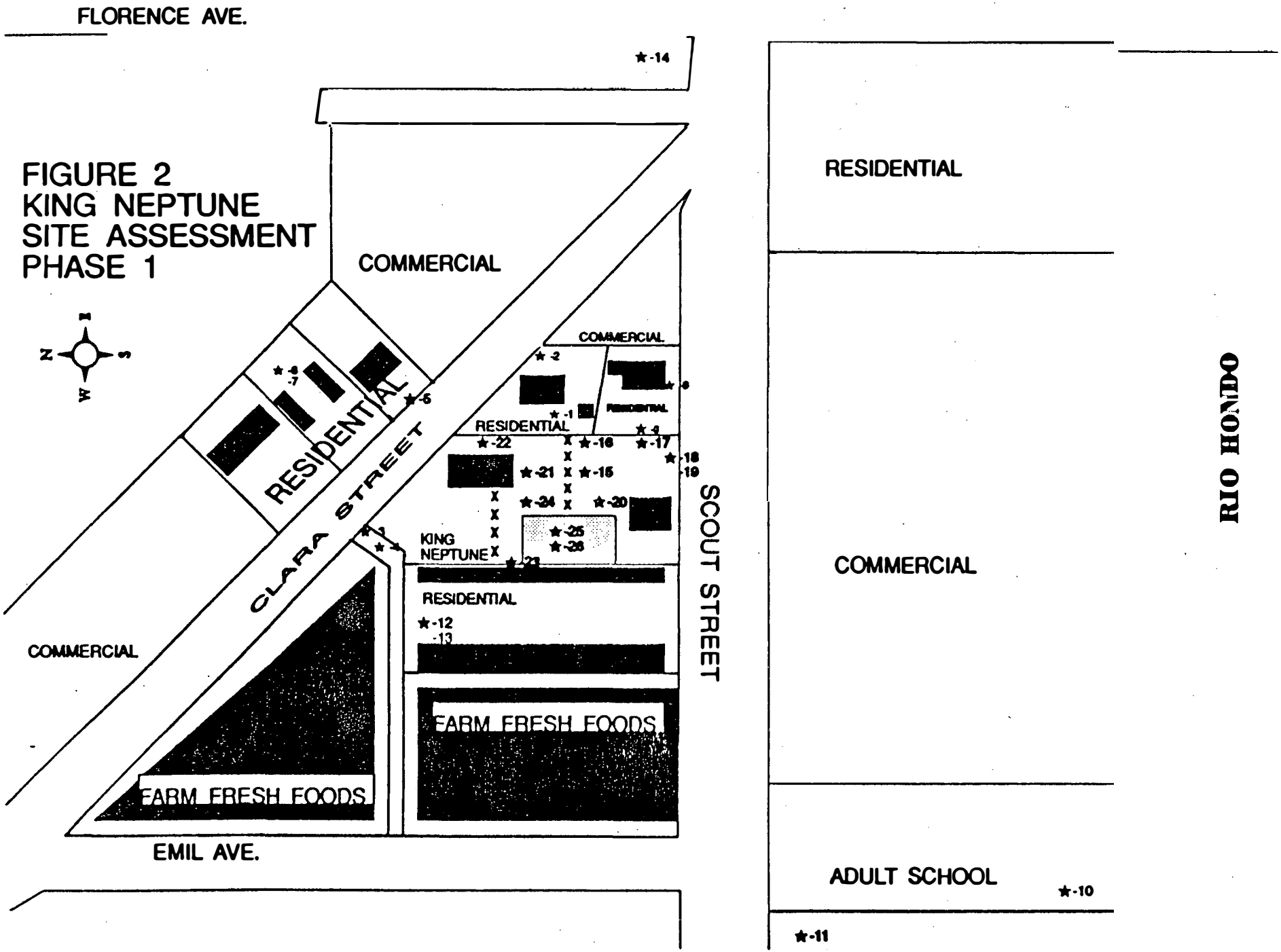
[redacted]

ATTACHMENT A

FIGURES

FIGURE 1
SITE LOCATION
KING NEPTUNE MANUFACTURERS

FIGURE 2
KING NEPTUNE SITE ASSESSMENT PHASE 1



ATTACHMENT B

TABLES

TABLE 1
LOS ANGELES COUNTY SAMPLING RESULTS

DATE	LOCATION/SAMPLE#	TOTAL LEAD CONCENTRATION
01-23-84	Soil outside property line fence / #1-MG	38,020.80 mg/kg
01-23-84	Soil in backyard / #2-MG	1,249.99 mg/kg
01-30-84	Northeast corner of alleyway on Emil St. / 1-30-84MG #1	213.50 mg/kg
01-30-84	1759 Scout Ave., near alleyway, one inch sample / 1-30-84MG #2	140.60 mg/kg
04-05-85	Rear of SFD / #4-5-85-1	11,800.00 mg/kg
04-05-85	Center yard adjacent to wash board / #4-5-85-2	1,300.00 mg/kg
04-05-85	Cement walk, north side of the facility / #4-5-85-3	48,000.00 mg/kg
04-05-85	Front of 7745 Scout Ave. / #4-5-85-4	7,790.00 mg/kg
04-05-85	Two feet from apartment complex / #4-5-85-5	Non-Detect
04-05-85	Lead waste in container, next to smelter	45,200.00 mg/kg
12-19-91	Top of smelting pot / #251*	23,430.00 ug
12-19-91	Top of work table / #252*	9,750.00 ug
12-19-91	Top of lead ingot storage table / #228*	9,540.00 ug
12-19-91	Top of cutting saw / #227*	9,930.00 ug
12-19-91	Floor below smelting pot / #12-19-91FD-1	120,000.00 mg/kg
12-19-91	Floor below cutting saw / #12-19-91FD-2	128,000.00 mg/kg
12-19-91	Soil outside garage, 25 feet from pot /#12-19-91FD-5	2,330.00 mg/kg
12-19-91	Soil outside garage, 10 feet from pot / #12-19-91FD-6	324.00 mg/kg

TABLE 2
TECHNICAL ASSISTANCE TEAM SAMPLING RESULTS

SAMPLE#	LOCATION	TOTAL LEAD CONCENTRATION
1	6622 Clara St., in front of the garage	471.00 mg/kg
2	6622 Clara St., northwest corner of lot	25.80 mg/kg
3	Public right of way in front of 6612 Clara St. at intersection with alley	6,120.00 mg/kg
4	Drainage pathway in alley bordering 6612 Clara St.	11,100.00 mg/kg
5	Right of way in front of fenced house 6625 Clara St.	147.00 mg/kg
6	Backyard of 6615 Clara St.	78.30 mg/kg
7	Duplicate of Sample #6	74.90 mg/kg
8	7743 Scout St., along fence line bordering 6612 Clara St.	272.00 mg/kg
9	7743 Scout St., along fence line bordering Scout St.	59.00 mg/kg
10	Adult school playground	3.42 mg/kg
11	John Anson Ford Park	18.10 mg/kg
12	Garden at 7751 Scout St.	100.00 mg/kg
13	Garden at 7751 Scout St.	135.00 mg/kg
14	Intersection of Scout St. and Florence Ave.	35.40 mg/kg
15	6612 Clara St., along north fence line where old house was located	1,910.00 mg/kg
16	6612 Clara St., along northeast fence line where old house was located	234.00 mg/kg
17	6612 Clara St., along southeast fence line where old house was located	118.00 mg/kg
18	6612 Clara St., fence line an Scout St.	2,010.00 mg/kg
19	Duplicate of Sample #18	1,370.00 mg/kg

TABLE 2
(continued)

SAMPLE#	LOCATION	TOTAL LEAD CONCENTRATION
20	6612 Clara St., southwest side of yard along walkway	3,540.00 mg/kg
21	6612 Clara St., northeast side of yard	507.00 mg/kg
22	6612 Clara St., backyard next to house	4,460.00 mg/kg
23	6612 Clara St., corner next to electrical room	3,040.00 mg/kg
24	6612 Clara St., west side of backyard next to smelter building	5,900.00 mg/kg
25	6612 Clara St., inside of smelter building, floor dust	547,000.00 mg/kg
26	6612 Clara St., inside of smelter building, smelter slag	455,000.00 mg/kg