ORIGINAL

See Code Guide for Instructions

Site Assessment CERCLIS/WasteLAN Data Entry Form
EPA Region III - Brownfields & Site Assessment Section (3HS34)

Site Name: DEPT. OF COMMERCE

WasteLAN ID#: 03 DSN: VA-596 EPA ID#: VA3470090025

Site-Level Data

Edit CERCLIS/WasteLAN Identifying Information: (Site Name, Address, City, County, County ID, State, Zip Code)

Explain: FEDERAL FACILITY

Site Type: *(See Attachment A for a list of valid options)*

Non-NPL Status: *(See Antachment A for a list of valid options)* NF : NFRAP

Collapsed Site Name: *(Enter the 'child' site to be merged into the 'parent' site above)* ID#:

Parent/Child Relationship:

☐ **ERS Exclusion:** *(An ERS Exclusion Determination Form must be completed)* **ERS Exclusion Date:**

☐ **NFFA (No Further Federal Action)** **NFFA Date:**

☑ **Archive** *(See Attachment A: Prohibited Open Actions at Archived Sites)* **Archive Date:** 10/7/2004

☐ **RCRA Deferral Audit Special Initiative** ☐ Lead Confirmed ☐ New Decision ☐ Further Superfund Assessment

Action-Level Data

Action Name	Lead	Start Date	Compl.Date	Qualifier
Pre-CERCLIS Screening (HX)	F EP	/ /	/ /	
Site Discovery (DS)	F EP FF S TR		/ /	
Preliminary Assessment (PA)	F EP S TR	04 09 91	10 7 2004	A D F H L N W DN B SA
Fed Fac Preliminary Assessment Review (RX)	F EP S TR	/ /	/ /	A D H L N DN B SA
Site Inspection (SI)	F EP S TR	/ /	/ /	A D F H L N W DN B SA
Combined PA/SI (NX)	F EP S TR	/ /	/ /	A D F H L N W DN B SA
Site Inspection Prioritization (SH)	F EP S TR	/ /	/ /	A D F H L N W DN B SA
Site Reassessment (OO)	F EP S TR	/ /	/ /	A D F H L N W DN B SA
Expanded Site Inspection (ES)	F EP S TR	/ /	/ /	A D F G L N W DN B SA
Fed Fac Site Inspection Review (TY)	F EP S TR	/ /	/ /	A D H L N DN B SA
Fed Fac ESI Review (TZ)	F EP S TR	/ /	/ /	A D G L N DN B SA
ESI/RI (SS)	F EP S TR	/ /	/ /	A D F G L N W DN B SA
HRS Package (HR)	F EP S TR	/ /	/ /	D F N O W DN SA
Rmvl Assess and Preliminary Assess (QT)	F EP S TR	/ /	/ /	A D F H L N W DN B SA
Rmvl Assess and Site Inspection (QJ)	F EP S TR	/ /	/ /	A D F H L N W DN B SA
Int. Rmvl Assess and SI Prioritization (QO)	F EP S TR	/ /	/ /	A D F H L N W DN B SA
Int. Rmvl Assess and Combined PA/SI (OU)	F EP S TR	/ /	/ /	A D F H L N W DN B SA
Int. Rmvl Assess and ESI/RI (OV)	F EP S TR	/ /	/ /	A D F G H L N W DN B SA
Int. Rmvl Assess and ESI (OY)	F EP S TR	/ /	/ /	A D F G H L N W DN B SA
Int. Rmvl Assess and HRS Package (OZ)	F EP S TR	/ /	/ /	A D F H L N W DN B SA
Other Cleanup Activity (VA)	FF SR PS RP SE S SN TR	/ /	/ /	H L
☐ Comprehensive Site Investigation ☐ Remedy Selection ☐ Construction		/ /	/ /	
☐ Post-Construction Maintenance ☐ Design ☐ Short Term Cleanup				
Laboratory Support (LA) Start Date - date site is initiated Completion Date - date site is archived	F EP FF MR SR PS RP SD S SN TR	/ /	/ /	
Comfort / Status Letter Start Date - date letter requested Completion Date - date of letter	FE	/ /	/ /	WL RE

Authorization (SAM) Signature & Date	Removal Info. Mgmt. Assistant Signature & Date	Data Quality Coord. Signature & Date
Charlene C. Cramer 10/7/2004	RH 10/12/04	RE 10/12/04

SA01- revised 02/2004

REMEDIAL SITE ASSESSMENT DECISION - EPA REGION III

EPA ID: VA3470090025 **Site Name:** DEPT OF COMMERCE **State ID:** VA-596

Alias Site Names:

City: ARLINGTON **County or Parish:** ARLINGTON **State:** VA

Refer to Report Dated: 09/14/1993 **Report Type:** PRELIMINARY ASSESSMENT 001

Report Developed by: EPA/In House

DECISION:

[X] **1. Further Remedial Site Assessment under CERCLA (Superfund) is not required because:**

[X] **1a. Site does not qualify for further remedial site assessment under CERCLA (No Further Remedial Action Planned - NFRAP)**

[ ] **1b. Site may qualify for action, but is deferred to:**

[ ] **2. Further Assessment Needed Under CERCLA:**

2a. Priority: [ ] **Higher** [ ] **Lower**

2b. Other: (recommended action) NFRAP (No Futher Remedial Action Planned

DISCUSSION/RATIONALE:

This investigation was performed in order to gather the data necessary to evaluate the site as a candidate for the National Priorities List (NPL).

By letter dated August 3, 1993, EPA Region III's Federal Facilities Program received correspondence regarding the facility status of the Department of Commerce site located in Arlington, Virginia. The U.S. Department of Commerce requested that the Arlington, Virginia facility be removed from the non-compliance lists and be reclassified as a small quantity generator and not a large quantity generator. The U.S. Department of Commerce also provided documentation to illustrate that there were no spills or releases at the Arlington, Virginia facility. The Arlington, Virginia facility generated liquid hazardous wastes from a small printing operation. The quantity of wastes was less than 55 gallons of liquid which was disposed off-site every six (6) months.

The EPA Federal Facilities Program=s contractor prepared a memorandum dated September 14, 1993, providing recommendations for the site. Based on the information in the memorandum regarding the small quantities of wastes being generated and disposed of off-site, and that there was no evidence of spills at the facility at that time, no further actions by EPA are anticipated at the site.

Pathways of Concern:

Air Migration Pathway: There was no evidence of contamination within the air migration pathway; therefore, the probability of contact with these receptors is low.

Groundwater Migration Pathway: There was no evidence of groundwater contamination; therefore, the probability of adverse impact to the drinking water is negligible.

Soil Exposure Pathway: There was no evidence of soil contamination exposure since there was no contact with the soil and the probability of adversely impacting the soil is minimal.

Surface Water Migration Pathway: There was no evidence of adverse exposure to a surface water pathway within a four (4) mile radius that would impact drinking water, the human food chain, or the environment. Therefore, the probability of contact with these receptors is low.

Based on this information, the site does not qualify for further evaluation as a candidate for the National Priorities List and the site will be qualified as No Further Remedial Action Planned (NFRAP) in the CERCLA data base.

This report was prepared based on information provided in the memorandum to the Federal Facilities Section, which may be found in the site file.

Report Reviewed/Approved:
Site Decision Made By: Charlene C. Creamer Site Assessment Manager

Site Decision Made by: CHARLENE CREAMER

Signature: _____ **Date:** 10/07/2004

RD 10/12/04

EPA Form # 9100-3

DISCUSSION/RATIONALE:

This investigation was performed in order to gather the data necessary to evaluate the site as a candidate for the National Priorities List (NPL).

By letter dated August 3, 1993, EPA Region III's Federal Facilities Program received correspondence regarding the facility status of the Department of Commerce site located in Arlington, Virginia. The U.S. Department of Commerce requested that the Arlington, Virginia facility be removed from the non-compliance lists and be reclassified as a small quantity generator and not a large quantity generator. The U.S. Department of Commerce also provided documentation to illustrate that there were no spills or releases at the Arlington, Virginia facility. The Arlington, Virginia facility generated liquid hazardous wastes from a small printing operation. The quantity of wastes was less than 55 gallons of liquid which was disposed off-site every six (6) months.

The EPA Federal Facilities Program's contractor prepared a memorandum dated September 14, 1993, providing recommendations for the site. Based on the information in the memorandum regarding the small ıantities of wastes being generated and disposed of off-site, and that there was no evidence of spills at the .acility at that time, no further actions by EPA are anticipated at the site.

Pathways of Concern:

Air Migration Pathway: There was no evidence of contamination within the air migration pathway; therefore, the probability of contact with these receptors is low.

Groundwater Migration Pathway: There was no evidence of groundwater contamination; therefore, the probability of adverse impact to the drinking water is negligible.

Soil Exposure Pathway: There was no evidence of soil contamination exposure since there was no contact with the soil and the probability of adversely impacting the soil is minimal.

ɔurface Water Migration Pathway: There was no evidence of adverse exposure to a surface water pathway within a four (4) mile radius that would impact drinking water, the human food chain, or the environment. Therefore, the probability of contact with these receptors is low.

Based on this information, the site does not qualify for further evaluation as a candidate for the National Priorities List and the site will be qualified as No Further Remedial Action Planned (NFRAP) in the CERCLA data base.

This report was prepared based on information provided in the memorandum to the Federal Facilities Section, which may be found in the site file.

Report Reviewed/Approved: Charlene C. Creamer 10/7/2004
Site Decision Made By: Charlene C. Creamer **Signature:** Lynda A. Beck **Date:** 10/07/04
Site Assessment Manager

EPA Form # 9100-3

REMEDIAL SITE ASSESSMENT DECISION - EPA REGION 3

Site Name: Dept of Commerce **EPA iD#:** VA3470090025 **DSN:** VA-596

Alias Site Names: _____

City: Arlington **County:** Arlington **State:** VA

Refer to Reports Dated: September 14,1993 **Report type:** Site Evaluation Memorandum

Report developed by: Contractor for EPA Region III - Federal Facilities Section

DECISION:

| x | **1. Further Remedial Site Assessment under CERCLA (Superfund) is not required because:**

| x | 1a. Site does not qualify for further remedial site assessment under CERCLA (No Further Remedial Action Planned – NFRAP)

| | 1b. Site may qualify for further action, but is deferred to: | | RCRA | | NRC

| **2. Further Assessment Needed Under CERCLA:** 2a. (optional) Priority: | | Higher | | Lower

2b. Activity Type: | | PA | | SI | | ESI | | HRS evaluation | | Other:_____

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

Preliminary Assessment (Abbreviated)

Site Name: Dept of Commerce

Discovery Date: 04/09/1991

Address: P.O. Box 6-F16

CERCLIS ID#: VA3470090025

Dump Site #: VA-596

This site was initially identified (discovered) and assessed by EPA's Federal Facilities Program, as described in the attached documentation. This abbreviated Preliminary Assessment evaluates the site, using the Federal Facilities information, according to the criteria of the Hazard Ranking System ("HRS") model.

Waste Characteristics:

Sources remaining?: __ Yes x No

If yes, probable waste characteristics factor value: __ Low __ Medium __ High

Likelihood of Release/Exposure and Targets:

Pathway	Likelihood of Release/Exposure				Targets/Receptors (probable targets factor value)		
	Potential to Release			Observed Release			
	Low	Medium	High		Low	Medium	High
Groundwater Migration	x				x		
Surface Water Migration	x				x		
Soil Exposure	x				x		
Air Migration	x				x		

Overall:

HRS Score is expected to be: x Below 28.5 __ Above 28.5 __ Unsure

Recommendation for further action:

x None __ Full PA __ SI __ State Program: _____

__ Integrated Assessment w/ Removal __ Removal __ Other: _____

Prepared by: Charlene C. Creamer 10/7/2004
(Charlene C. Creamer, Site Assessment Manager) (Date)

ORIGINAL
(Red)

VA-596

EPA

POTENTIAL HAZARDOUS WASTE SITE
SITE IDENTIFICATION

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
VA	3470090025

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site)	02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER				
Dept of Commerce	PO Box 6 - File Repository				
03 CITY	04 STATE	05 ZIP CODE	06 COUNTY	07 COUNTY CODE	08 CONG DIST
Arlington	VA	22202			

09 DIRECTIONS TO SITE (Starting from nearest public road)

III. RESPONSIBLE PARTIES

01 OWNER (If known)	02 STREET (Business, residential, mailing)		
Dept. of Commerce			
03 CITY	04 STATE	05 ZIP CODE	06 TELEPHONE NUMBER ( )
07 OPERATOR (If known and different from owner)	08 STREET (Business, residential, mailing)		
Same as above			
09 CITY	10 STATE	11 ZIP CODE	12 TELEPHONE NUMBER ( )

13 TYPE OF OWNERSHIP (Check one)
☐ A. PRIVATE ☒ B. FEDERAL: Dept of Commerce (Agency name) ☐ C. STATE ☐ D. COUNTY ☐ E. MUNICIPAL
☐ F. OTHER: _____ (Specify) ☐ G. UNKNOWN

IV. HOW IDENTIFIED

01 DATE IDENTIFIED: 10 23 86 (MONTH DAY YEAR)

02 IDENTIFIED BY (Check all that apply)
☐ A. CITIZEN COMPLAINT ☐ B. INDUSTRY ☐ C. STATE/LOCAL GOVERNMENT ☐ D. AERIAL RECONNAISANCE
☐ E. RCRA INSPECTION ☐ F. SURFACE IMPOUNDMENT ASSESSMENT ☐ G. OTHER EPA IDENTIFICATION
☐ H. OTHER _____ (Specify)

V. SITE CHARACTERIZATION

01 TYPE OF SITE (Check all that apply)
☐ A. STORAGE ☐ B. TREATMENT ☐ C. DISPOSAL ☐ D. UNAUTHORIZED DUMPING ☐ E. OTHER _____ (Specify)

02 SUMMARY OF KNOWN PROBLEMS (Provide narrative description)

See attached

03 SUMMARY OF ALLEGED OR POTENTIAL PROBLEMS (Provide narrative description)

See attached

VI. INFORMATION AVAILABLE FROM

01 CONTACT	02 OF (Agency/Organization)			03 TELEPHONE NUMBER
Wilson, Gail	Dept of Commerce			(703) 486-8307
04 PREPARED BY	05 AGENCY	06 ORGANIZATION	07 TELEPHONE NUMBER	08 DATE
Lisa M. Cunningham	EPA	3HW06	(215) 597-0184	9 / 2 / 11 (MONTH DAY YEAR)

EPA FORM 2070-11 (7-81)

ORIGINAL (Red)

ID — For Official Use Only			
C		T/A	C
W			1

X. Description of Hazardous Wastes *(continued from front)*

A. Hazardous Wastes from Nonspecific Sources. Enter the four-digit number from 40 *CFR* Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
7	8	9	10	11	12

B. Hazardous Wastes from Specific Sources. Enter the four-digit number from 40 *CFR* Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
F002					
19	20	21	22	23	24
25	26	27	28	29	30

C. Commercial Chemical Product Hazardous Wastes. Enter the four-digit number from 40 *CFR* Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. Listed Infectious Wastes. Enter the four-digit number from 40 *CFR* Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 — 261.24)*

☐ 1. Ignitable *(D001)* ☐ 2. Corrosive *(D002)* ☐ 3. Reactive *(D003)* ☐ 4. Toxic *(D000)*

XI. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature	Name and Official Title *(type or print)*	Date Signed
Millisa Gary	Millisa Gary, Prog Control	10/6/86

EPA Form 8700-12 (Rev. 11-85) Reverse

Spec.

RECEIVED
WV/VA SECTION

OCT 16 1986

U.S. EPA, Region III

ORIGINAL
(Red)

EPA

ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act *(RCRA)*. Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

INSTALLATION ADDRESS

EPA Form 8700-12B (4-80)

PRC Environmental Management, Inc.
1700 Sansom Street
Suite 403
Philadelphia, PA 19103
215-972-0444
Fax 215-972-0484

PRC

September 14, 1993

(b) (4)
Subcontractor Monitor Dynamac Corporation
80 West Lancaster Avenue
Devon, Pennsylvania 19333

Contract No.: 68-W9-0005
Work Assignment No.: C03062
Subject: Department of Commerce
Site Evaluation

Dear Mr. (b) (4)

Please find enclosed the Site Evaluation Memorandum for the Department of Commerce facility. PRC Environmental Management, Inc. (PRC) is submitting this memorandum to you as deliverable for work assignment C03062.

Please call me at (b) (4) if you have any questions or comments.

Sincerely,

(b) (4)

(b) (4)
Project Manager

enclosures

cc: (b) (6), TES VIII Program Manager

contains recycled fiber and is recyclable

1700 Sansom Street
Suite 403
Philadelphia, PA 19103
215-972-0444
Fax 215-972-0484

PRC

MEMORANDUM

Date: September 14, 1993

To: (b) (4) [redacted] Subcontractor Monitor, Dynamac Corporation

From: (b) (4) [redacted] PRC Environmental Management, Inc.

Subject: Site Evaluation
Department of Commerce
Arlington, Virginia
Federal Facility ID No.: VA3470090025
EPA ID No.: VA3470090025
Dump Site No.: VA-596

Background

The Department of Commerce facility was listed on the Federal Facility Hazardous Waste Compliance Docket on December 12, 1988. The reporting mechanism for the listing was a RCRA 3010 (Notification of Hazardous Waste Activity) that was submitted on October 6, 1986. The notification indicated that the facility was a generator of hazardous waste (EPA hazardous waste number F002, chlorinated solvents). According to representatives of the Department of Commerce, the notification should have indicated that the facility was a small quantity generator (less than 1,000 kilograms per month were generated). The hazardous wastes were generated from printing operations conducted at the facility.

From an undetermined date until 1990 or 1991, the facility was a warehouse leased from the Cafritz Company by the Department of Commerce for storage of paper (files) and for a small printing operation. Liquid wastes were generated by the printing operation. The actual types (constituents) of liquid wastes generated are not known. However, it is known that less than 55 gallons of liquid wastes were generated and disposed of off site every six months. Wastes were stored in a drum storage area before they were disposed of off site.

Recommendations

Because small quantities of wastes were generated and were disposed of off site, a designation of site evaluation accomplished (SEA) is recommended for this facility.

contains recycled fiber and is recyclable

VA 596; VA3470090025 **PRC ENVIRONMENTAL MANAGEMENT, INC.**

RECORD OF TELEPHONE CONVERSATION

Date 7 / 29 / 93 (Month/Day/Year) : **Project Number** 008C03062

Name (b) (4) : **Contact** Alison Michael

Initiated Call [X] : **Firm/Agency**

Returned Call [ ] : **Street**

Received Call [ ] : **City** ___ **State**

Time 11:00 am ___ pm : **Zip** ___

EAS [X] CEN [ ] MTN [ ] PAC [ ] : **Phone** 410/532-1770 **Ext.** ___

SUBJECT: Department of Commerce

TELECON SUMMARY

I told Ms. Michael that Mr. Weidenfeld referred me to her about the Dept. of Commerce file repository in Arlington, VA.

She told me that the facility was a leased warehouse that is no longer used. There was a drum storage area for fluids used in the printing operations. Waste fluids were disposed of offsite according to RCRA regulations through the Department of Commerce Headquarters. The last shipment was 1990 or 1991.

REQUIRED RESPONSE

None [ ] Phone Call [ ] Memo [ ] Letter [ ] Report [ ]

cc: File [ ] Proj. Mgr. [ ] Prin. Inv. [ ] Other [ ] _____ Specify

5/28/93

VA 596: VA3470090025 **PRC ENVIRONMENTAL MANAGEMENT, INC.**

RECORD OF TELEPHONE CONVERSATION

Date 7 / 29 / 93
Month/Day/Year

Project Number 008C03062

Name (b) (4) [redacted]
Initiated Call [X]
Returned Call [ ]
Received Call [ ]
Time 11:00 am ___ pm

EAS [X] CEN [ ] MTN [ ] PAC [ ]

Contact Department of Commerce
Firm/Agency ___
Street ___
City ___ **State** ___
Zip ___

Phone ___ **Ext.** ___

SUBJECT: ___

TELECON SUMMARY

- Trying to find contact person for the Dept. of Commerce facility VA3470090025
- Mr. Weidenfeld (703) 305-8341 referred me to Alison Michael (410) 532-1770
- Correct contact person Tom KilCullen (703) 305-8183

REQUIRED RESPONSE

None [ ] Phone Call [ ] Memo [ ] Letter [ ] Report [ ]

cc: File [ ] Proj. Mgr. [ ] Prin. Inv. [ ] Other [ ] ___
Specify

5/28/93

VA 596; VA3470090025 **PRC ENVIRONMENTAL MANAGEMENT, INC.**

RECORD OF TELEPHONE CONVERSATION

Date 7 / 30 / 93
Month/Day/Year

Project Number 008C03062

Name (b) (4) [redacted]
Initiated Call [X]
Returned Call [ ]
Received Call [ ]
Time 10:00 am ___ pm

EAS [X] CEN [ ] MTN [ ] PAC [ ]

Contact Tom KilCullen
Firm/Agency Dept. of Commerce
Street ___
City ___ **State** ___
Zip ___
Phone 703/305-8183 **Ext.** ___

SUBJECT: Background Dept. of Commerce Facility

TELECON SUMMARY

I asked Mr. KilCullen about the Dept. of Commerce site referred to as the File Repository 1232 South EADS, Arlington, VA 22202 on the Notification of Hazardous Waste Activity that indicated that F002 chlorinated solvents were generated by the facility. Mr. KilCullen told me that the File Repository was a warehouse that was leased for storage of paper files. There also may have been a printing operation. The warehouse and/or the equipment was leased from the Cafirtz Company he thinks. The warehouse has not been used since 1990 (or maybe 1991). There may have been a drum storage area for fluids used in printing operations. All waste solvents were disposed of off-site through the Department of Commerce Headquarters.

REQUIRED RESPONSE

None [ ] Phone Call [ ] Memo [ ] Letter [ ] Report [ ]

Person that may know more about the site is Richard Statesfield.

cc: File [ ] Proj. Mgr. [ ] Prin. Inv. [ ] Other [ ] ___
Specify

5/28/93

UA 3 16
UA 3470090025

Dept. of Commerce

PRC ENVIRONMENTAL MANAGEMENT, INC.

RECORD OF TELEPHONE CONVERSATION

Date 7,30,93
Month/ Day /Year

Project Number 008003062

Name (b) (4) [redacted]
Initiated Call [X]
Returned Call [ ]
Received Call [ ]
Time 1000 am _____ pm
EAS [X] CEN [ ] MTN [ ] PAC [ ]

Contact Tom Kil Cullen
Firm/Agency Dept. of Commerce
Street
City State
Zip
Phone 703 1305 - 8183 Ext.

SUBJECT: Background Dept. of Commerce Facility

TELECON SUMMARY

I asked Mr. Kil Cullen About the Dept. of Commerce site referred to as the File Repository 1232 South EADS, Arlington, VA 22202 on the Notification of Hazardous Waste Activity that indicated that F002 chlorinated solvents were generated by the facility. Mr. Kil Cullen told me that the File Repository was a warehouse that was leased for storage of paper files. There may have also been a printing operation. The warehouse and/or the equipment was leased from the Cafritz Company he thinks. The warehouse has not been used since 1990 (or maybe 1991). There may have been a drum storage area for fluids used in printing operations. All waste solvents were disposed of off-site through the Department of Commerce Headquarters

REQUIRED RESPONSE

None [ ] Phone Call [ ] Memo [ ] Letter [ ] Report [ ]

Person that may ~~at~~ know more about the site is Richard ~~Staterfield~~ Staterfield

cc: File [ ] Proj. Mgr. [ ] Prin. Inv. [ ] Other [ ] _____
Specify

06/22/88

A 596
A 3470090025

PRC ENVIRONMENTAL MANAGEMENT, INC.

RECORD OF TELEPHONE CONVERSATION

Date 7/29/93
Month/ Day /Year

Project Number 008C03062

Name (b) (4) [redacted]
Initiated Call [✓]
Returned Call [ ]
Received Call [ ]
Time 1100 am ____ pm
EAS [✓] CEN [ ] MTN [ ] PAC [ ]

Contact Alison Micheal
Firm/Agency
Street
City State
Zip
Phone 410 532-1770 Ext.

SUBJECT: Dept. of Commerce

TELECON SUMMARY

I told Ms. Micheal that Mr. Weidenfeld referred me to her about the Dept. of Commerce file repository in Arlington VA.

She told me that the facility was a leased warehouse that is no longer used.
There was a drum storage area for fluids used in the printing operations. Waste fluids were disposed of offsite according to RCRA regulations through the Dept. of Commerce Headquarters. The last shipment was 1990 or 1991

REQUIRED RESPONSE

None [ ] Phone Call [ ] Memo [ ] Letter [ ] Report [ ]

cc: File [ ] Proj. Mgr. [ ] Prin. Inv. [ ] Other [ ] ____ Specify

06/22/88

VA-596
VA3470090025

PRC ENVIRONMENTAL MANAGEMENT, INC.

RECORD OF TELEPHONE CONVERSATION

Date 7/29/93
Month/ Day /Year

Project Number

Name (b) (4) [redacted]
Initiated Call [X]
Returned Call [ ]
Received Call [ ]
Time 1100 am ____ pm
EAS [ ] CEN [ ] MTN [ ] PAC [ ]

Contact Department of
Firm/Agency Commerce
Street
City State
Zip
Phone / - Ext.

SUBJECT:

TELECON SUMMARY

- Trying to find contact person for the Dept. of Commerce facility. VA3470090025
- Mr. Weidenfield - 703-305-8341 referred me to Alison Mackeal 410-532-1770
- Correct contact person Tom Kil Cullen 703-305-8183

REQUIRED RESPONSE

None [ ] Phone Call [ ] Memo [ ] Letter [ ] Report [ ]

cc: File [ ] Proj. Mgr. [ ] Prin. Inv. [ ] Other [ ] ____
Specify

06/22/88

PRC Environmental Management, Inc.
1700 Sansom Street
Suite 403
Philadelphia, PA 19103
215-972-0444
Fax 215-972-0484

PRC

September 17, 1993

(b) (4) [redacted]
Subcontractor Monitor Dynamac Corporation
80 West Lancaster Avenue
Devon, Pennsylvania 19333

Contract No.:	68-W9-0005
Work Assignment No.:	C03062
Subject:	Department of Commerce Revised Site Evaluation

Dear Mr. Horvat:

Please find enclosed the revised Facility Summary Review and the Site Evaluation Memorandum for the Department of Commerce facility. PRC Environmental Management, Inc. (PRC) is submitting this memorandum to you as deliverable for work assignment C03062.

Please call me at (b) (4) [redacted] f you have any questions or comments.

(b) (4) [redacted]

Project Manager

enclosures

cc: (b) (4) [redacted] TES VIII Program Manager

contains recycled fiber and is recyclable

Summary of the U.S. Environmental Protection Agency's Facility Review
(September 17, 1993)

Facility:	Department of Commerce
Federal Facility ID No.:	VA3470090025
EPA ID No.:	VA3470090025
Dump Site No.:	VA-596

Background

The Department of Commerce facility was listed on the Federal Facility Hazardous Waste Compliance Docket on December 12, 1988. The reporting mechanism for the listing was a RCRA 3010 (Notification of Hazardous Waste Activity) that was submitted on October 6, 1986. The notification indicated that the facility was a generator of hazardous waste (EPA hazardous waste number F002, chlorinated solvents). According to representatives of the Department of Commerce, the notification should have indicated that the facility was a small quantity generator (less than 1,000 kilograms per month were generated). The hazardous wastes were generated from printing operations conducted at the facility.

From an undetermined date until 1990 or 1991, the facility was a warehouse leased from the Cafritz Company by the Department of Commerce for storage of paper (files) and for a small printing operation. Liquid wastes were generated by the printing operation. The actual types (constituents) of liquid wastes generated are not known. However, it is known that less than 55 gallons of liquid wastes were generated and disposed of off site every six months. Wastes were stored in a drum storage area before they were disposed of off site.

References Reviewed:

PRC Environmental Management, Inc. 1993. Record of Telephone Conversation Regarding the Department of Commerce Facility. Between (b) (4) Environmental Scientist, and Tom KilCullen, Department of Commerce. July.

United States Environmental Protection Agency. 1986. Notification of Hazardous Waste Activity. Prepared by Millisa Gary, Program Control, Department of Commerce. October 6.

1700 Sansom Street
Suite 403
Philadelphia, PA 19103
215-972-0444
Fax 215-972-0484

PRC

MEMORANDUM

Date: September 17, 1993

To: (b) (4) Subcontractor Monitor, Dynamac Corporation

From: (b) (4) C Environmental Management, Inc.

Subject: Site Evaluation
Department of Commerce
Arlington, Virginia

Federal Facility ID No.:	VA3470090025
EPA ID No.:	VA3470090025
Dump Site No.:	VA-596

Background

The Department of Commerce facility was listed on the Federal Facility Hazardous Waste Compliance Docket on December 12, 1988. The reporting mechanism for the listing was a RCRA 3010 (Notification of Hazardous Waste Activity) that was submitted on October 6, 1986. The notification indicated that the facility was a generator of hazardous waste (EPA hazardous waste number F002, chlorinated solvents). According to representatives of the Department of Commerce, the notification should have indicated that the facility was a small quantity generator (less than 1,000 kilograms per month were generated). The hazardous wastes were generated from printing operations conducted at the facility.

From an undetermined date until 1990 or 1991, the facility was a warehouse leased from the Cafritz Company by the Department of Commerce for storage of paper (files) and for a small printing operation. Liquid wastes were generated by the printing operation. The actual types (constituents) of liquid wastes generated are not known. However, it is known that less than 55 gallons of liquid wastes were generated and disposed of off site every six months. Wastes were stored in a drum storage area before they were disposed of off site.

Recommendations

Because small quantities of wastes were generated and were disposed of off site, a designation of site evaluation accomplished (SEA) is recommended for this facility.

contains recycled fiber and is recyclable

PRC Environmental Management, Inc.

Work Product Review Checklist

QA/QC Level 0

Project/Contract No. 030-003612e | Client/Contract

Type * D L P R O | Title: Dept of Commerce | Draft or Final: | No. of Pages: 1

Checklist Initiated By: [redacted]	Deadline 1st Draft	Final Review Deadline	Delivery Due Date
WA Mgr./Tech. Monitor Project Manager: (b) (4) [redacted]	Date Rec'd from Sub	Date Drafted	Author of Work Product:
Editorial Reviewer (ER) (b) (4) [redacted]	Deadline ER Review:	Date Reviewed:	Signature:
Technical Reviewer (T (b) (4) [redacted]	Deadline TR Review:	Date Reviewed:	Signature: (b) (4) [redacted]
QC Coordinator (QCC): (b) (4) [redacted]	Deadline QCC Review:	Date Reviewed:	Signature:
Word Processing (WP): (b) (4) [redacted]			Signature:

Item	Prim Resp	Sec Resp	Changes Not Req'd	Changes Recommended	Changes Needed
Introduction	ER	A/A			
Site/Project Background	A/A				
Validity of Data	TR	A/A			
Unusual Site Conditions Studied	TR	A/A			
Pertinent Discussion	TR	A/A			
Supported Conclusions	TR	A/A			
Justifiable Recommendations	TR	A/A			
Tables & Figures Cited & Attached	ER	A/A			
Complete Reference List Attached	ER	A/A			
Appendices Attached	A/A				
Clear & Readable Text	ER	A/A			
Overall Organization	ER	A/A			
Technical Adequacy/Accuracy	TR	QCC			
Tech. Complete, All Altern. Considered	TR	QCC			
Scope of Work Plan Objectives Covered	TR	QCC			
Supporting Materials Used in Tech Review?	TR Y/N				
Report Format	ER				
Consistency in Terminology	ER				
Appropriate Summary	ER				

* Work product types: D for database, L for letter, P for plan, R for report, O for other type. Circle one.
Responsibility: ER = Editorial Reviewer; TR = Tech Reviewer; QCC = Quality Control Coordinator; A/A = as appropriate
Best use QA4 to document detailed comments and list necessary changes.

All comments resolved and changes made __ or not required __ : _____ QCC Signature _____ Date

Distribution: 1) Original and detailed comments sheets, if any, plus copy of final version to project file 2) Copy of checklist & detailed comments sheets, if any, plus optional hard copy of final version to QA/QC file 3) Copy to Tech Reviewer 4) Copy to QCC

VA 596; VA3470090025 **PRC ENVIRONMENTAL MANAGEMENT, INC.**

RECORD OF TELEPHONE CONVERSATION

Date 7 / 30 / 93
Month/Day/Year

Project Number 008C03062

Name (b) (4)
Initiated Call [X]
Returned Call [ ]
Received Call [ ]
Time 10:00 am ___ pm

Contact Tom KilCullen
Firm/Agency Dept. of Commerce
Street ___
City ___ **State** ___
Zip ___

EAS [X] CEN [ ] MTN [ ] PAC [ ]

Phone 703/305-8183 **Ext.** ___

SUBJECT: Background Dept. of Commerce Facility

TELECON SUMMARY

I asked Mr. KilCullen about the Dept. of Commerce site referred to as the File Repository 1232 South EADS, Arlington, VA 22202 on the Notification of Hazardous Waste Activity that indicated that F002 chlorinated solvents were generated by the facility. Mr. KilCullen told me that the File Repository was a warehouse that was leased for storage of paper files. There also may have been a printing operation. The warehouse and/or the equipment was leased from the Cafirtz Company he thinks. The warehouse has not been used since 1990 (or maybe 1991). There may have been a drum storage area for fluids used in printing operations. All waste solvents were disposed of off-site through the Department of Commerce Headquarters. Person that may know more about the site is Richard Staterfield.

REQUIRED RESPONSE

None [ ] Phone Call [ ] Memo [ ] Letter [ ] Report [ ]

cc: File [ ] Proj. Mgr. [ ] Prin. Inv. [ ] Other [ ] ___
Specify

PRC ENVIRONMENTAL MANAGEMENT, INC.

RECORD OF TELEPHONE CONVERSATION

Date 7 / 27 / 92
Month/Day/Year

: **Project Number** 008C0306204

Name (b) (4) [redacted]
Initiated Call [ ]
Returned Call [ ]
Received Call [x]
Time ___ am 2:55 pm

EAS [X] CEN [ ] MTN [ ] PAC [ ]

: **Contact** Oscar Mastin
: **Firm/Agency** U.S. Dept. of Commerce
: **Street** _____
: **City** ___ **State** ____
: **Zip** ____

: **Phone** _____ **Ext.** _____

SUBJECT: PA - whereabouts

TELECON SUMMARY

Oscar called and did not understand what had to be done.

He was calling on behalf of Gil Wiendenfeld. Oscar was just calling to let me know they were working on it. Finding who had information regarding PA.

REQUIRED RESPONSE

None [X] Phone Call [ ] Memo [ ] Letter [ ] Report [ ]

cc: File [X] Proj. Mgr. [ ] Prin. Inv. [ ] Other [ ] _____
Specify

03/10/92

PRC ENVIRONMENTAL MANAGEMENT, INC.

RECORD OF TELEPHONE CONVERSATION

Date 07/27/92
Month/ Day /Year

Project Number 008C0506204

Name (b) (4) [redacted]

Initiated Call [ ]
Returned Call [ ]
Received Call [X]

Time _____ am 2:55 pm

EAS [ ] CEN [ ] MTN [ ] PAC [ ]

Contact Oscar Martin
Firm/Agency U.S. Dept of Commerce
Street
City _____ State _____
Zip
Phone / - Ext.

SUBJECT PA - whereabouts

TELECON SUMMARY

Oscar called and did not understand what had to be done.
He was calling on behalf of Gee Weindenfeld
Oscar was just calling to let me know they were working on it. - Finding who had information regarding PA

(b) (4) [redacted]

7/27/92

REQUIRED RESPONSE

None [ ] Phone Call [ ] Memo [ ] Letter [ ] Report [ ]

cc: File [ ] Proj. Mgr. [ ] Prin. Inv. [ ] Other [ ] _____
Specify

06/22/88

PRC ENVIRONMENTAL MANAGEMENT, INC.

RECORD OF TELEPHONE CONVERSATION

Date 7 / 27 / 92
Month/Day/Year

Project Number 008C0306204

Name (b) (4)
Initiated Call [x]
Returned Call [ ]
Received Call [ ]
Time ___ am 3:30 pm

Contact Thomas Kilcullen
Firm/Agency Commerce - U.S. Dept.
Street _____
City ___ **State** _
Zip _____

EAS [ ] CEN [ ] MTN [ ] PAC [ ]

Phone _____ **Ext.** _____

SUBJECT: Preliminary Assessment

TELECON SUMMARY

I called Thomas Kilcullen and asked if he had information regarding the PA. I reported to me that to his knowledge two letters were sent to clear up the mixing of being on the docket. One letter was sent to Course Headquarters and one letter sent to the State of Virginia (1989). In 1990, Gail Wilson changed the status. The status was changed with the Federal Government.

The person in the headquarters that would be able to answer what happened and what the final outcome was.

Richard Satterfield - Environment Officer (202) 377-4115

REQUIRED RESPONSE

None [ ] Phone Call [ ] Memo [ ] Letter [ ] Report [ ]

cc: File [X] Proj. Mgr. [ ] Prin. Inv. [ ] Other [ ] _____
Specify

03/10/92

PRC ENVIRONMENTAL MANAGEMENT, INC.

RECORD OF TELEPHONE CONVERSATION

Date 09/27/92
Month/ Day /Year

Project Number 00860306.204

Name (b) (4) [redacted]

Initiated Call [X]
Returned Call [ ]
Received Call [ ]

Time ____ am 3:30 pm

EAS [ ] CEN [ ] MTN [ ] PAC [ ]

Contact Thomas Kilcullen
Firm/Agency Commerce - US Dept.
Street
City State
Zip
Phone / - Ext.

SUBJECT: Preliminary Assessment.

TELECON SUMMARY

I called Thomas Kilcullen and asked if he had information regarding the PA. I reported to me that to his knowledge two letters were sent to clear up the mix-up of being on the docket. One letter was sent to Course Headquarters and one letter sent to the State of Virginia (1989) In 1990 Gail Wilson changed the status. The status was changed with the Federal Government.

The person in headquarters that would be able to answer what happened and what the final outcome was

Richard Satterfield - Environmental Officer
(202) 377-4115

(b) (4) [redacted]

REQUIRED RESPONSE

None [ ] Phone Call [ ] Memo [ ] Letter [ ] Report [ ]

cc: File [ ] Proj. Mgr. [ ] Prin. Inv. [ ] Other [ ] ____
Specify

06/22/88

PRC ENVIRONMENTAL MANAGEMENT, INC.

RECORD OF TELEPHONE CONVERSATION

Date 7 / 24 / 92
Month/Day/Year

Project Number 008C0306204

Name (b) (4)
Initiated Call [x]
Returned Call [ ]
Received Call [ ]
Time ___ am 2:17 pm

EAS [X] CEN [ ] MTN [ ] PAC [ ]

Contact Gil Weindenfeld
Firm/Agency _____
Street _____
City ___ **State** _____
Zip _____

Phone _____ **Ext.** _____

SUBJECT:

TELECON SUMMARY

Called Gil - no information known on PA. Still working on it.

REQUIRED RESPONSE

None [X] Phone Call [ ] Memo [ ] Letter [ ] Report [ ]

cc: File [X] Proj. Mgr. [ ] Prin. Inv. [ ] Other [ ] _____
Specify

03/10/92

PRC ENVIRONMENTAL MANAGEMENT, INC.

RECORD OF TELEPHONE CONVERSATION

Date 07 / 21 / 92
Month/ Day /Year

Project Number _____

Name (b) (4) [redacted]

Initiated Call [X]
Returned Call [ ]
Received Call [ ]

Time _____ am 2:17 (pm)
EAS [ ] CEN [ ] MTN [ ] PAC [ ]

Contact Gil Weindenfeld.
Firm/Agency _____
Street _____
City _____ State _____
Zip _____
Phone / - Ext. _____

SUBJECT _____

TELECON SUMMARY

Called Gil - No information known on PA. Still working on it.

(b) (4) [redacted]

7/21/92

REQUIRED RESPONSE

None [ ] Phone Call [ ] Memo [ ] Letter [ ] Report [ ]

cc: File [ ] Proj. Mgr. [ ] Prin. Inv. [ ] Other [ ] _____
Specify

06/22/88

PRC ENVIRONMENTAL MANAGEMENT, INC.

RECORD OF TELEPHONE CONVERSATION

Date 7 / 27 / 92
Month/Day/Year

Project Number 008C0306204

Name (b) (4)
Initiated Call [ ]
Returned Call [ ]
Received Call [x]
Time __ am __ pm

EAS [X] CEN [ ] MTN [ ] PAC [ ]

Contact Gil Weindenfeld
Firm/Agency U.S. Dept. of Commerce
Street _____
City Arlington **State** VA
Zip _____

Phone 703/305/8341 **Ext.** _____

SUBJECT: Preliminary Assessment

TELECON SUMMARY

Gil Weindenfeld called to let me know that he researched the information. I faxed to him 7/23 and found a contact who would have information regarding the subject of PA.

Thomas Kilcullen 703-305-8183

REQUIRED RESPONSE

None [X] Phone Call [ ] Memo [ ] Letter [ ] Report [ ]

cc: File [X] Proj. Mgr. [ ] Prin. Inv. [ ] Other [ ] _____
Specify

03/10/92

PRC ENVIRONMENTAL MANAGEMENT, INC.

RECORD OF TELEPHONE CONVERSATION

Date 07 / 27 / 92
Month/ Day /Year

Project Number

Name (b) (4) [redacted]
Initiated Call [ ]
Returned Call [ ]
Received Call [X]
Time _____ am _____ pm
EAS [ ] CEN [ ] MTN [ ] PAC [ ]

Contact Gil Wrindenfeld
Firm/Agency US Dept of Commerce
Street
City ARLINGTON State VA
Zip
Phone 703 / 305 - 8341 Ext.

SUBJECT: Telemedy Assessment

TELECON SUMMARY

Gil Wrindenfeld called to let me know that he received the information I faxed to him. He is and found a contact who would have information regarding the budget of OPA.

(b) (4) [redacted]

703-305-8183

(b) (4) [redacted]

7/27/92

REQUIRED RESPONSE

None [ ] Phone Call [ ] Memo [ ] Letter [ ] Report [ ]

cc: File [ ] Proj. Mgr. [ ] Prin. Inv. [ ] Other [ ] _____
Specify

06/22/88

PRC ENVIRONMENTAL MANAGEMENT, INC.

RECORD OF TELEPHONE CONVERSATION

Date 07 / 22 / 92
Month/ Day /Year

Project Number 008C0306204

Name (b) (4) [redacted]

Returned Call [ ]
Received Call [ ]

Time _____ am _____ pm
EAS [ ] CEN [ ] MTN [ ] PAC [ ]

Contact Gil Weidenfeld
Firm/Agency U.S. Dept. of Commerce
Street Park 1 Suite 208B
City Washington State DC
Zip 20231
Phone 703 305 - 8341 Ext. _____

SUBJECT: The PA on U.S. Dept. of Commerce was never submitted

TELECON SUMMARY

I spoke to Gil Weidenfeld about where his PA submittal was on his site. Gil Weidenfeld replied that he had no idea what I was talking about. He had never dealt with the EPA and no idea what a PA was.

I informed him to the best of my knowledge about what he needed. He still had no recollection of dealing with the EPA.

I then told him I would fax the information so he could review it and figure out who at his facility would have information on the PA.

REQUIRED RESPONSE

None [ ] Phone Call [ ] Memo [ ] Letter [ ] Report [ ]

cc: File [ ] Proj. Mgr. [ ] Prin. Inv. [ ] Other [ ] _____
Specify

06/22/88

PRC ENVIRONMENTAL MANAGEMENT, INC.

RECORD OF TELEPHONE CONVERSATION

Date 8 / 12 / 92
Month/ Day /Year

Project Number 00000006204

Name (b) (4) [redacted]

Initiated Call [ ]
Returned Call [ ]
Received Call [X]

Time 9:25 am ____ pm
EAS [ ] CEN [ ] MTN [ ] PAC [ ]

Contact Richard Satterfield
Firm/Agency Commerce - US Dept
Street
City ____ State ____
Zip
Phone 703 1760 - 9801 Ext. ____

SUBJECT: Reference to two letters submitted to clear up mixup

TELECON SUMMARY

Mr. Richard Satterfield returned my call and informed me that the U.S. Department of Commerce Patents and Trademarks was at one time considered contaminated - it is now demolished or soon will be demolished. He (Richard Satterfield) used Tom Kilcullen to submit two letters stating they were a small quantity generator. He should all be cleared up now - and no PA is necessary - to his understanding.

Richard has changed location and his successor is Robert Heneman 202-377-4115 all documentation is with Robert.

(b) (4) [redacted]

He also gave me info on other sites - Oxford Marine

REQUIRED RESPONSE

None [ ] Phone Call [ ] Memo [ ] Letter [ ] Report [ ]

cc: File [ ] Proj. Mgr. [ ] Prin. Inv. [ ] Other [ ] ____
Specify

06/22/88

UNITED STATES DEPARTMENT OF COMMERCE
Patent and Trademark Office
ASSISTANT SECRETARY AND COMMISSIONER
OF PATENTS AND TRADEMARKS
Washington, D.C. 20231

August 3, 1993

Ms. Yazmine Yap
Site Assessment Manager
U.S. Environmental Protection Agency
841 Chestnut Street
Philadelphia, PA. 19107

RECEIVED
SITE ASSESSMENT
SECTION

Mailbox: 3HW73

Dear Ms. Yap:

This correspondence is in reference to a conversation I had on July 30, 1993 with (b) (4) [redacted] a contractor with EPA, phone (b) (4) [redacted] That conversation concerned the facility known as "Arlington File Repository Site". She suggested I write to you about the docket status of the Arlington site (it still appears on the EPA "docket"), and about the contention that this site may be registered as a violator, allegedly having had a spill or accident at the site.

The attached documents will substantiate the efforts made in 1992 to comply with EPA directives relative to this matter. Other documents are also provided for your use, hoping they will afford you the insight needed to place the Arlington site into its proper historical place. These other documents relate to a similar situation with the records of the state of Virginia, and also to A-106 budget considerations, which may be generally helpful to you as further background information.

I would submit that the Arlington site should be eliminated from any current dockets in the EPA registers or from current lists under any other applicable Federal laws or regulations. I would further request that corrections be made to historical documents to properly reflect the true status of this facility for the years when it did generate a very small quantity of hazardous waste. I believe the Arlington site never was a "generator" or "large quantity generator". Please note that this site never generated or stored more waste than the quantities noted in the attached documents. Also please be advised, and please correct all records relating to spill/accident events; this site never experienced any such event.

This memorandum is not intended to place a labor intensive burden on you or your staff; however, neither am I anxious to repeat what I thought had been done before. If the attached documents are not sufficient to correct the existing status of this site, I will be glad to assist with additional information and/or supplemental documents to close out all questions about this site once and for all.

Upon receipt of this letter please call me at 703-305-8183 for additional discussion as I am anxious to resolve this matter. Thank you.

Sincerely:

Thomas J. Kilcullen

Thomas J. Kilcullen
Security/Safety Officer

Attachments

UNITED STATES DEPARTMENT OF COMMERCE
Chief Financial Officer
Assistant Secretary for Administration
Washington, D.C. 20230

3 1992

MEMORANDUM FOR: Environmental Compliance Officers
(See Distribution List at Attachement 1)

FROM: Richard J. Satterfield, Environmental Engineer
Office of Management Support,
Office of Federal Assistance
and Management Support

SUBJECT: Federal Agency Hazardous Waste Compliance Docket

Our office is presently conducting a review of the Federal Agency Hazardous Waste Compliance Docket (See Attachement 2) which is maintained by the Environmental Protection Agency (EPA).

Docket updates of all Federal agencies are required under 40 CFR 120(c) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA). EPA is required to establish a Federal Agency Hazardous Waste Compliance Docket that contains information regarding Federal facilities that manage hazardous waste or from which hazardous substances may be or have been released. CERCLA requires the docket to be updated every six months. In addition, Executive Order (E.O.) 12088 "Federal Compliance With Pollution Control Standards" clarifies that each Federal agency must ensure the compliance of all facilities under their jurisdiction and fully cooperate with EPA, State, interstate, and local agencies to prevent control and abate environmental pollution.

In accordance with these regulations and as directed by E.O. 12088, our office must submit review comments to the Docket Coordinator at EPA. Please review the attached listing and indicate corrections, proposed additions, or deletions to the Docket which affect the sites under your purview. Since the Department is required to submit comments to EPA by March 31, 1992, we need your comments by March 25, 1992. Should you have any questions please don't hesitate to contact me at (202 or FTS) 377-4115.

Attachements

cc: Robert Heinemann

Attachment 1

Distribution List

Environmental Compliance Officers

I. Sam Higuchi
Environmental, Health and Safety Officer
Procurement Grants and Administrative Services
National Oceanic and Atmospheric Administration
Room 4450, SSMC 2
OA3X1-SSMC2-PGAS
(301) 713-0845

Lyman Pevey
Chief, Occupational Health
National Institute of Standards and Technology
Room B-124, Building 301, S&P Building
(301) 975-5818

Thomas Kilcullen
Security and Safety Officer
Patent and Trademark Office
Suite 803, CPK 1
2011 Crystal Drive
(703) 305-8183

Frank Monteferrante
Environmental Branch Senior Specialist
Economic Development Administration
Room 7019, HCHB
(202) 377-4208

David Garcia
Health and Safety Officer
Bureau of Census
Room 3273, FB3
(301) 763-7737

UNITED STATES DEPARTMENT OF COMMERCE
Patent and Trademark Office
ASSISTANT SECRETARY AND COMMISSIONER
OF PATENTS AND TRADEMARKS
Washington, D.C. 20231

DATE: March 19, 1992

TO: Richard Satterfield, Environmental Engineer
OFAMS/OMS, Department of Commerce

FROM: Office of Administrative Services

SUBJECT: Federal Agency Hazardous Waste Compliance Docket

In response to your letter (date obscured, but received by me today) concerning this topic, the PTO has no additions to report. However, our sole entry (highlighted attachment) should be removed from this docket because we no longer operate the facility, nor do we generate or store hazardous waste. In fact, the address is vacant since the expiration of our lease in 1991.

If these records do need to be maintained, the following corrections should be recorded:

Facility Name - File Repository
Facility Address - 1232 S. Eads St.

No further information is required. I may be reached at 703-305-8183 for additional information.

T. Thomas J. Kilcullen

Thomas J. Kilcullen
Security/Safety Officer

Attachment

Recharge for Satterfield
3-19

FEDERAL AGENCY HAZARDOUS WASTE COMPLIANCE DOCKET
Interim Listing - Dockets #5 and #6

AGENCY	ID NUMBER	FACILITY NAME	FACILITY ADDRESS	CITY	STATE	ZIP CODE	REGION	REPORTING MECHANISM	UPDATE DATE
COMMERCE	NJ6141700116	NOAA/NMFS/NEFC	SANDY HOOK LABORATORY	HIGHLANDS	NJ	07732	2	3005 3010	02/12/88
COMMERCE	MD-131531811	NATIONAL BUREAU OF STANDARDS	QUINCE ORCHARD RD	GAITHERSBURG	MD	20760	3	3005 3010 103c	02/12/88
COMMERCE	MD0131430175	OXFORD NATIONAL MARINE FISHERIES SERVICE	US DEPT OF MARINE FISHERIES, OXFORD LABORATORY	OXFORD	MD		3		12/15/89
COMMERCE	VA3470090025	ARLINGTON	FILE REPOSITORY 1232 SE	ARLINGTON	VA	22202	3	3010	02/12/88
COMMERCE	AL7730000000	CENTRAL FOUNDRY	OLD HOLT RD OFF RIVER RD. HOLT, AL.	TUSCALOOSA	AL		4	3016	11/16/88
COMMERCE	NC3131430180	NATIONAL MARINE FISHERIES SERVICE	PIVERS ISLAND OFF US HWY 70 WEST	BEAUFORT	NC	28512	4	3010 3016	02/12/88
COMMERCE	IL5130090090	BUREAU OF THE CENSUS	2255 ENTERPRISE DR	WESTCHESTER	IL	60153	5	3010	12/15/89
COMMERCE	IN5130000065	JEFFERSONVILLE FEDERAL CENTER	1201 E. 10TH STREET	JEFFERSONVILLE	IN	47130	5	3010 3016	02/12/88
COMMERCE	CA5143690167	NATIONAL MARINE FISHERIES SERVICE	3150 PARADISE DR	TIBURON	CA		9	103c	12/13/91
COMMERCE	WA8130000096	COLUMBIA GARDENS		PASCO	WA		10	103c	12/15/89
COMMERCE	WA1131430919	NOAA-MANCHESTER FIELD STATION	7305 BEACH-ST DRIVE EAST	PORT ORCHARD	WA		10	103c	09/27/91

EPA FORM NO. 3500-7

EPA

United States Environmental Protection Agency
Washington DC 20460

Federal Agency Environmental Plan - Project Report

I. Facility Information

1. State Alpha: VA
2. Agency/Bureau: 1300
3. OSA Installation:
4. EPA Region: 03
5. Country: USA
6. New Installation: ☒ yes ☐ no
7. Ownership Type: PL
8. Name of the Installation: USPTO EADS STWAREHOUSE
9. Street Address: 1232 S. EADS ST.
10. City Name: ARLINGTON VA
11. ZIP Code: 22202-

II. Basic Project Information

1. Agency Project Number: PTO-001
2. Operable Unit/ Activity Data Sheet:
3. Multiple Installations: ☐ yes ☒ no
4. Statutory Authority: RCRA
5. Pollutant Category: HA2D
6. Funding Account:
7. Year Funding Required: 89
8. Project Name *(Brief Description)*: REMOVAL OF MICROFILM CLEANING FLUIDS
9. Project Contact Name: THOMAS J. KILCULLEN
10. Contact Telephone: 703 557 0183
11. Total Cost Estimate *(in $1,000's)*: 0
12. Environmental Project Assessment: ☐ High (H) - (Critical) ☐ Med (M) - (Important) ☒ Low (L) - (Desirable)
13. Compliance Status

Class I

- ☐ CMPA Conditions of a Signed Federal Facility Compliance Agreement, Consent Order, or equivalent State enforcement action
- ☐ INOV Deficiencies found on inspections by regulatory authority or cited in a Notice of Violation or equivalent
- ☐ ESDP Does not meet established standard and compliance deadline has passed

Class II

- ☐ ESDF Does not meet established standard and compliance is in the future
- ☐ PSDF Does not meet pending standard and compliance deadline is in the future

Class III

- ☐ ESRO Meets established standard but needs replacement due to obsolescence
- ☐ ESRE Meets established standard but needs replacement due to need for expansion
- ☐ ESDL Meets established standards but needs to demonstrate leadership
- ☒ OTHR Other

14. Estimated Requirements Cost

Fiscal Year	Budget Authority ($1,000's)	Apportionment/ Allocation ($1,000's)	Budget Outlay ($1,000's)

15. Project Milestones (Month/Year)

Design/Plan Completion	Final Compliance Required

Construction/Work

Start	Completion

Progress Code	Fiscal Year Completed
6	89

Progress Codes:
1 - Preliminary Planning
2 - Design
3 - Construction
4 - Work On going (non construction)
5 - Completed
6 - Discontinued
7 - Deferred
8 - Other - identify in project narrative
9 - Continuous

III. Project Narrative

Description *(including legal requirements and pollutants to be controlled)*

AN EXPERIMENTAL MICROFILM CLEANING CONTRACT OPERATION WAS UNDERTAKEN MID 1980'S ~~USING~~ GENERATING 99.2% 1.1.1 TRICHLOROETHANE 8% AS A BY-PRODUCT. CONTRACT WAS NOT SATISFACTORY AND WAS DISCONTINUED 1988. 3 55 GAL. DRUMS OF ABOVE WASTE WERE DISPOSED OF FEB 1989 USING "EASTERN CHEMICAL WASTE SYSTEMS" AS VEHICLE FOR DISPOSAL.

EPA PROVISIONAL # VAP 000004104 ISSUED 2-8-89

EPA Form 3500-7 (REV 1-91) Previous edition is obsolete.

UNITED STATES DEPARTMENT OF COMMERCE
Patent and Trademark Office
ASSISTANT SECRETARY AND COMMISSIONER
OF PATENTS AND TRADEMARKS
Washington, D.C. 20231

April 24, 1990

Mr. Glenn Moore
Department of Waste Management
11th floor, Monroe Building
101 N. 14th Street
Richmond, Va. 23219

Dear Mr. Moore:

Attachment 1 is the requested "Generator Annual Hazardous Waste Report for 1989", a report from the U. S. Patent and Trademark Office. It should be noted that the delay in forwarding the information stems from the fact that the actual generator of the waste is a contractor working for the PTO, and your January 1990 request never reached the responsible party (undersigned) until April 4, 1990.

Attachment 2 is the information available concerning the removal of all our hazardous waste. Please note this removal took place in calendar year 1989.

This memorandum is also sent for another purpose. We request a change in our status from "Small Quantity Generator" to "Non-handler" status. This request is based on the fact that when we generated hazardous waste in 1988 and 1989, it was done on a short term contract, a contract for one year to clean our microfilm. This contract has expired, the job has been completed, we did not generate any waste so far in 1990, and we will not be generating any hazardous waste in the remainder of 1990. Therefore we are requesting a change in status as noted.

Thank you in advance for your consideration. I may be reached at the Office of General Services, phone 703-557-0183 for additional information.

Thomas J. Kilcullen
Security/Safety Officer

Attachments

COMMONWEALTH of VIRGINIA

DEPARTMENT OF WASTE MANAGEMENT
11th Floor, Monroe Building
101 N. 14th Street
Richmond, VA 23219
(804) 225-2667

JAN 17 1990

Dear Hazardous Waste Coordinator:

The Department of Waste Management files indicated that your company is a Large Quantity Generator of hazardous waste. In accordance with the Virginia Hazardous Waste Management Regulations, you are required to file a Hazardous Waste Annual Report for the 1989 calendar year NO LATER THAN **MARCH 1, 1990**. The forms, enclosed, which you are required to complete consist of a State Reporting Form (unchanged from last year) and a one-page Waste Minimization Form (instructions enclosed).

If you have any questions concerning completion of the State Reporting Form, please call me at (804) 225-2499, or Tom McCarley at (804) 225-2791, or another member of the hazardous waste staff at (804) 225-2667. Questions concerning the Waste Minimization Form should be addressed to Bill Sarnecky at (804) 371-8713.

Sincerely,

Lisa A. Clark

Lisa A. Clark
Assistant Technical Services Chief
Division of Technical Services

Enclosures

...NUAL HAZARDOUS WASTE REPORT FOR 1989

This report is for the calendar year ending December 31, 1989
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1989 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1	Non-handler
(2)	Small Quantity Generator
3	Conditionally Exempt Small Quantity Generator
9	Out of Business

II. GENERATOR'S EPA I.D. NUMBER

VA 3470090025

III. NAME OF ESTABLISHMENT

UNITED STATES PATENT AND TRADEMARK OFFICE

IV. ESTABLISHMENT MAILING ADDRESS

OFFICE OF GENERAL SERVICES, CRYSTAL PARK ONE, SUITE 80-
Street or P.O. Box

WASHINGTON D.C. 20231
City or Town State Zip Code

V. LOCATION OF ESTABLISHMENT (if different than Section IV above)

1232 S. EADS STREET
Street or Route number

ARLINGTON VA. 22202
City or Town State Zip Code

VI. ESTABLISHMENT CONTACT

KILCULLEN, THOMAS J
Name (last and first)

703-557-0183
Phone Number (area code and number)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Thomas J Kilcullen THOMAS J. KILCULLEN 4-23-90
Signature Print Name Date

GENERATOR ANNUAL HAZARDOUS WASTE REPORT FOR 1989
(continued)

This report is for the calendar year ending December 31, 1989

ORIGINAL (Red)

VIII. GENERATOR'S EPA I.D. NO.
VA 3470090025

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)
RINECO CHEMICAL INDUSTRI

X. FACILITY'S EPA I.D. NO.
ARP 981057870

XI. FACILITY ADDRESS
1007 VULCAN RD - HASKELL
BENTON, ARKANSAS
72015

XII. TRANSPORTATION SERVICES USED

EPA I.D. NO(s) DCD 981735244 (7)

NAME EASTERN CHEMICAL WASTE SYSTEMS

XIII. WASTE IDENTIFICATION

	A. Description of Waste	B. EPA Hazardous Waste Number(s) (see instructions)		C. Amount of Waste	D. Unit of Measure
1	RQ WASTE 1,1,1 TRICHLOROETHANE			3 - 55 GAL.	G
2				(165) DRUMS	
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					

XIV. COMMENTS (enter information by section number - see instructions)

XIII UNABLE TO DETERMINE EPA HAZARDOUS WASTE #

GENERATOR ANNUAL HAZARDOUS WASTE REPORT FOR 1989 (continued)

ORIGINAL

This report is for the calendar year ending December 31, 1989

Sec. XV Enter the Standard Industrial Classification (SIC) Code that describes the principal products, group of products, produced or distributed, or the services rendered at the site's physical location. Enter more than one SIC Code only if no one industry description includes the combined activities of the site.

N/A

Sec. XVI Does this site have an area not requiring a RCRA Part A or Part B permit that is used exclusively for the short term accumulation of hazardous waste? Yes ___ No X

If yes, does the area have containers? Yes ___ No X

Does the area have tanks? Yes ___ No X

If the area does have tanks, enter the number of tanks and their total capacity in gallons:

Number _____ Gallon Capacity _____

WASTE CHARACTERIZATION & TREATMENT COST DETERMINATION

RVSD: 9/19/88
4 PART

Cost Determination/Stream № 5637

Eastern Chemical Waste Systems
a division of TSCGI
1101 14th Street, NW, Suite 620
Washington, DC 20005

ODER ECWS
management of environmental preservation™

Corporate Office: (202) 289-5490
Operations Office: (202) 636-9555
Elizabeth, NJ Office: (201) 352-6550
Newport News, VA Office: (804) 873-1112
Morrisville, PA Office: (215) 736-9330

Date: 2/6/89 Account Rep: TGB

Customer Vanguard Technologies Phone 703-557-7131

This WC & TCD is 1 of 1.

Mailing Address 10530 Rosehaven St Fairfax VA 22031

Generator Same EPA ID# TBD

Technical Contact John Washington Position — Phone 557-7131

Common Name of Waste 1,1,1 Trichlor EPA/State Waste No.

Proper USDOT Shipping Name

Hazard Class UN/NA No.

Quantity: Lbs Dm Gal Yd³ Ton (other) per: Mo. Qtr. Yr. 1 time (circle one) (other)

Types and Sizes of Containers:

Method of Shipment: ◯ Drumload ◯ Dump Trailer ◯ Vacuum Tanker ◯ CUSCO ◯ Other:

Hazardous Properties: ◯ Ignitable ◯ Corrosive ◯ Reactive ◯ EP Toxic ◯ Priority Pollutants ◯ None ◯ Other: *(see other chemical properties)*

Flash Point: >200 °F pH: 6-9 BTU per lb: Color: colorless Odor: mild

Top Layer: 100 %	Solid	Liquid	Sludge	Viscosity:	Low	Medium	High	Sp. Gv.:	<0.85	0.85 to 1.0	1.0 to 1.1	>1.1
Middle Layer: / %	Solid	Liquid	Sludge	Viscosity:	Low	Medium	High	Sp. Gv.:	<0.85	0.85 to 1.0	1.0 to 1.1	>1.1
Bottom Layer: / %	Solid	Liquid	Sludge	Viscosity:	Low	Medium	High	Sp. Gv.:	<0.85	0.85 to 1.0	1.0 to 1.1	>1.1

Average Range of Sludge (Depth) in Inches: Ø

Chemical Properties in PPM (1% = 10,000 ppm) (1 mg/l=1PPM): Total CN Free CN Sulfides

As Ba Cd Pb Hg Se Ag Zn Ni Cu

Fe PCBs Cyanides Organic Halide/Chloride Total Chromium Cr+3 Cr+6 Th

Other Chemical Properties:

Typical Constituents (Give Percentages): 99.2% 1,1,1 Trichloroethane, <1% other misc components

Process Which Generates Waste: microfilm processing - cleaning

MSDS, LP List or Analysis Attached? ◯ Yes ◯ No; if "yes", # of pages? Sample Submitted for T/S/D/F acceptance ◯ Yes ◯ No; #

NOTES UPDATE

265.00/55 gal dm
200.00 trans
100.00 OSC
15.00/ea Crush

White Copy to Customer with Quotation; Yellow Copy to Sales File; Pink Copy to Technical Support's Customer File; Gold Copy to Administration

WASTE CHARACTERIZATION & TREATMENT COST DETERMINATION

Eastern Chemical Waste Systems
a division of TSCGI
1101 14th Street, NW, Suite 620
Washington, DC 20005

management of environmental preservation™

Cost Determination/Stream 1842

Corporate Office: (202) 289-5490
Operations Office: (202)636-9555
Elizabeth, NJ Office: (201) 352-6552
Newport News, VA Office: (804) 873-1112
Morrisville, PA Office: (215) 736-9330

Date 5-19-88 Account Rep: DJF

Customer Vanguard Technologies/Patient & Trademark Phone 557-7131

Mailing Address One Flint Hill, Suite 300, 10530 Rosehaven St. Fairfax VA 22030

Generator same EPA ID#

Technical Contact John Braczа Position Facilities Mgr Phone 557-7131

Common Name of Waste waste film cleaning EPA Waste No.

Is Waste DOT Regulated? (X) yes ( ) no Proper USDOT Shipping Name

Quantity: 2 Lbs (Dm) Gal Yd³ LP Ton ____ (other) Frequency: Mo. (Qtr.) Yr. 1 time ____ (other)

Types and Sizes of Containers: 55 gallon

Method of Shipment: (X) Drumload ( ) Dump Trailer ( ) Vacuum Tanker ( ) CUSCO ( ) Other:

Hazardous Properties: ( ) Ignitable ( ) Corrosive ( ) Reactive ( ) EP Toxic ( ) Pesticide Residuals ( ) Priority Pollutants ( ) None ( ) Other: (see notes)

Flash Point: N/A °F pH: 7.0 BTU per lb: ____ Color: colorless Odor: none

Top Layer: 100 %	Solid	(Liquid)	Sludge	Viscosity:	(Low)	Medium	High	Sp. Gv.:	<0.85	0.85 to 1.0	1.0 to 1.1	>1.1
Middle Layer: ____ %	Solid	Liquid	Sludge	Viscosity:	Low	Medium	High	Sp. Gv.:	<0.85	0.85 to 1.0	1.0 to 1.1	>1.1
Bottom Layer: ____ %	Solid	Liquid	Sludge	Viscosity:	Low	Medium	High	Sp. Gv.:	<0.85	0.85 to 1.0	1.0 to 1.1	>1.1

Average Range of Sludge (Depth) in Inches: Ø"

Chemical Properties in PPM (1% = 10,000 ppm) (1 mg/l=1PPM): Total CN Ø Free CN Ø Flouride Ø

As Ø Ba Ø Cd Ø Pb Ø Hg Ø Se Ø Ag Ø Zn Ø N Ø Cu Ø

Fe Ø PCBs Ø Cyanides Ø Bromide Ø Total Chromium Ø Cr+3 Ø Cr+6 Ø Th Ø

Phosphates Ø Bisulfite Ø Sulfite Ø Sulfates Ø Sulfides Ø Organic Chloride X Iodine Ø

Other Chemical Properties:

Typical Constituents (Give Percentages): 99% 1,1,1-trichloroethane ;1% other components.

Process Which Generates Waste: used in cleaning microfilm

MSDS, LP Inventory, or Other Attached (X) Yes ( ) No; if "yes", how may pages attached? 3 Sample Submitted? ( ) Yes ( ) No; '87 #:

NOTES

White Copy to Customer with Quotation; Yellow Copy to Sales File; Pink Copy to Technical Support's Customer File; Gold Copy to Administration

STATE OF ARKANSAS
Department of Pollution Control and Ecology
P. O. Box 9583 Little Rock, Arkansas 72219
Telephone 501-562-7444

6

Please print or type. *(Form designed for use on elite (12-pitch) typewriter.)*

Form Approved. OMB No. 2050-0039. Expires 9-30-88

AR 6-88

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. VAT000041040 Manifest Document No. 9383

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
VANGUARD TECHNOLOGIES JOHN WASHCHIPION C/O
ONE FLINT HILL, SUITE 300,10530 ROSEHAVEN ST. FAIRFAX, VA 22039

4. Generator's Phone (703) 557-3204

A. State Manifest Document Number AR- 381764

B. State Generator's ID [illegible] LINE LINE 15

5. Transporter 1 Company Name EASTERN CHEMICAL WASTE SYSTEMS

6. US EPA ID Number DCD981735244

C. State Transporter's ID DCD981735244 PC ___ H ___

D. Transporter's Phone 202-636-9555

7. Transporter 2 Company Name EASTERN CHEMICAL WASTE SYSTEMS

8. US EPA ID Number DCD981735244

E. State Transporter's ID PC 1042 H 361

F. Transporter's Phone 202-636-9555

9. Designated Facility Name and Site Address
RINECO CHEMICAL INDUSTRIES
1007 VULCAN ROAD-HASKELL
BENTON, ARKANSAS 72015

10. US EPA ID Number ARD981057879

G. State Facility's ID

H. Facility's Phone 501-778-9989

11. US DOT Description *(Including Proper Shipping Name, Hazard Class, and ID Number)*	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ, WASTE 1,1,1-TRICHLOROETHANE ORM-A UN2831 (F002)	03	DM	90	G	F002
b.					
c.					
d.					

J. Additional Descriptions for Materials Listed Above

If no alternate TSDF, return to generator

K. Handling Codes for Wastes Listed Above
EMERGENCY RESPONSE INFORMATION:
JOHN WASHCHIPION
703-557-3204

15. Special Handling Instructions and Additional Information
SITE ADDRESS: 1232 S. EADS ST. ARLINGTON, VA
a. ALL ARE 55 GALLON SIZE DRUMS.

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and Arkansas state regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Gale A Wilson
Signature: Gale A Wilson
Month Day Year: 02 13 89

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: JAMES KURT OVERBERGER
Signature: James Kurt Overberger
Month Day Year: 02 13 89

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name
Signature
Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name
Signature
Month Day Year

GENERATOR / TRANSPORTER / FACILITY

EPA Form 8700-22 (Rev. 9-86) Previous edition is obsolete.

GENERATOR INITIAL COPY

ENVIRONMENTAL WASTE STORAGE
management of environmental preservation™ Page 1 of 2

ON-SITE WORK AND LABOR REPORT SHEET

Date of Work: ~~2/10/89~~ 13 No. ~~H01554~~

Main Office (202) 289-5490 Elizabeth, NJ (201) 325-6552 Baltimore, MD (301) 625-2500
Operations: (202) 636-4565 Morrisville, PA (215) 736-9330 Newport News, VA (804) 877-1112

A. CUSTOMER NAME & ADDRESS:
~~VANGUARD TECHNOLOGIES~~
~~ONE FLINT HILL SUITE 300~~
~~10530 ROSEHAVEN ST.~~
FAIRFAX VA 22030

B. GENERATOR:
~~SAME~~

C. SITE ADDRESS:
~~SAME~~
~~1232 S. Eads Street~~
Arlington, Va.

D. WORK ORDERS: a. ~~09289~~ b. 09284 c. d. e. f. g. h.

E. BOXES DELIVERED AND/OR USED: (If not listed below then record in notes section on page 2)

___ 55-gal. drum (each)	___ 16-H Drums (each)	___ 30-gallon overpack (each)
___ Vermiculite (bag)	___ 17-E Drums (each)	___ 55-gal. fiber drum (each)
___ Sample bottles (each)	___ 17-A 5 gallon pail (each)	___ lid, bolt, ring (set)
___ Tyvek suits (each)	___ 55-gallon 17-C poly (each)	___ screw (ball)
3 RCRA labels (each)	___ 55-gallon 17-H poly (each)	___ 30-gal. fiber drum (each)
6 DOT labels (each)	___ 15-gallon poly (each)	___ glass rods (each)
___ latex gloves (pair)	___ 30-gallon poly (each)	___ nitrile gloves (pair)

F. QUANTITY AND TYPE OF EMPTY CONTAINERS TO BE CRUSHED: ~~3-55 Gallon Lined Metal Drum~~

G. DID THESE CONTAINERS ONCE CONTAIN EPA-F LISTED WASTES? ( ) YES (✓) NO

H. IF YES TO G. HAVE THEY BEEN TRIPLE RINSED? If Answer is "No" call ECWS-HQ ( ) YES ( ) NO

I. WAS HAZARDOUS/RCRA/TSCA WASTE REMOVED FROM SITE? (✓) YES ( ) NO. If "YES" answer "J"

J. LIST MANIFEST NUMBERS: a. ~~AR-2815284~~ 3 drums b. c. d.
e. f. g. h.

BILL OF LADING NUMBERS USED: a. 09284 b. c. d.

L. LABPACKING PERFORMED? ( ) YES (✓) NO. If bottles left behind, attach list to this report.

M. IS THERE MORE WORK TO BE PERFORMED PER THIS ORDER? ( ) YES (✓) NO

N. IF YES, THEN DESCRIBE: _____

O. SHOULD SALES CONTACT CUSTOMER FOR ADDITIONAL WORK, OTHER THAN WHAT THE ORDER CALLS FOR? ( ) YES (✓) NO. IF YES, DESCRIBE IN NOTES SECTION ON PAGE 2.

P. ON-SITE EQUIPMENT USED (including trucks): Truck #H05
~~Plastic Barrel, Funnel, Drum Dolly, Pipe Plug Rod, Cu Longer, Toilet, Gloves, Bag, Bung Wrench, Brass Pick, Mounted Toilet Detection Kit~~

Q. WAS THIS DONE?
___ Labpacking
(✓) Drum Pickup
___ Drum Return (describe below)
___ Supplies del. (cash)
___ Drum Pumpout
(✓) Pour Off Tab
___ Ground Removal
___ Inventory
___ Emergency spill response
___ Consultation
___ Training seminar
___ Other

DATE [illegible] 2/13/89 J.K.O.

CUSTOMER: VANGUARD TECHNOLOGIES GENERATOR: Same NO.:

LABOR COST CODE	*After initials designates a trainee & customer will not be charged for their presence or work..... NAME OF PERSON	INITIALS..	ECWS PORT DEPT TIME	JOB SITE ARVL TIME	JOB SITE DEPT TIME	ECWS PORT ARVL TIME	TOTAL HOURS PORTAL PORTAL	TOTAL HOURS ON-SITE
OSCOOD	James Kurt Overberger	J.K.O.	Stop #1 12:25	1:30	2:50			

LABOR CODE	=	DESCRIPTION	LABOR CODE	=	DESCRIPTION
UIC00D	=	UIC in level D	FT100D	=	TECH I in level D
UIC00C	=	UIC in level C	FT100C	=	TECH I in level C
UIC00B	=	UIC in level B	FT100B	=	TECH I in level B
UIC00A	=	UIC in level A	FT100A	=	TECH I in level A
OSC00D	=	OSC in level C	FT200D	=	TECH II in level D
OSC00C	=	OSC in level C	FT200C	=	TECH II in level C
OSC00B	=	OSC in level B	FT200B	=	TECH II in level B
OSC00A	=	OSC in level A	FT300D	=	TECH III in level D
			FT200C	=	TECH III in level C

NOTES: Picked up three drums of 1,1,1-Trichloroethane, OPM-A hazard classed material, for disposal at Rineco Chemical Industries. The three drums picked up as empties for disposal were found on site to still have significant liquid residue in them. With generators on site personnel assistance, these residues were poured off into the other "full" drums. Emptied drums then removed from site per customer's request.

I CERTIFY THAT THE STATEMENTS MADE ON THIS REPORT ARE TRUE:

JAMES KURT OVERBERGER — James Kurt Overberger — 02/13/89

ECWS ON-SITE COORDINATOR (Print Only) SIGNATURE OF ON-SITE COORDINATOR DATE

CUSTOMER'S NAME AND TITLE (Print Only) SIGNATURE OF CUSTOMER DATE

THIS MEMORANDUM is an acknowledgment that a bill of lading has been issued and is not the Original Bill of Lading, not a copy or duplicate, covering the property named herein, and is intended solely for filing or record.

RECEIVED, subject to the classifications and lawfully filed tariffs in effect on the date of the receipt by the carrier of the property described in the Original Bill of Lading.

Shipper's No. 09884

(Name of Carrier) ECWS

1101 14th st. ste. 620 WASH D.C. 20005 SCAC. _____ Carrier's No. —

At FEBRUARY 28, 13 19 89 From VANGUARD TECHNOLOGY

the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated below, which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in Uniform Freight Classification in effect on the date hereof, if this is a rail or a rail-water shipment, or (2) in the applicable motor carrier classification or lawfully filed tariff if this is a motor carrier shipment.

Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or lawfully filed tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

(Mail or street address of consignee — For purposes of notification only)

Consigned to EASTERN CHEMICAL WASTE SYSTEMS

Destination ECWS State DC County — Delivery Address* 1525 W. ST NE. WASH, DC 20018

(*To be filled in only when shipper desires and governing lawfully filed tariffs provide for delivery thereat)

Route DIRECT

Delivering Carrier ECWS Car or Vehicle Initials H No. 05

Number of Packages	KIND OF PACKAGE, DESCRIPTION OF ARTICLES, SPECIAL MARKS, AND EXCEPTIONS	*Weight (Sub. to Correction)	Class or Rate	Check Column
3	EMPTY 55 GALLON (metal)	120 lbs.	—	—
	DRUMS FOR CRUSHING			
	AND DISPOSAL			

Subject to Section 7 of conditions of applicable bill of lading, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:

The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of Consignor)

If charges are to be prepaid write or stamp here, "To be Prepaid"

Received $ _____ to apply in prepayment of the charges on the property described hereon.

Agent or Cashier

Per _____

(The Signature here acknowledges only the amount prepaid.)

Charges Advanced

$ _____

Collect On Delivery $ and remit to

C.O.D. Charge to be paid by Shipper ☐ Consignee ☐

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight.

NOTE — Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.

The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____ per _____

"This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according

Per

(b) (4) [redacted]

Shipper, Per _____

3

(b) (4) [redacted]

ECWS-02/E

M NO. 1 BLS. (Rev. 5/87)

[redacted]

UNITED STATES DEPARTMENT OF COMMERCE
Patent and Trademark Office
ASSISTANT SECRETARY AND COMMISSIONER
OF PATENTS AND TRADEMARKS
Washington, D.C. 20231

ORIGINAL (Red)

DATE: April 7, 1992

TO: Richard Satterfield, Environmental Engineer
OFAMS/OMS, Department of Commerce

FROM: Office of Administrative Services

SUBJECT: A-106 Budget Submissions

Responding to your correspondence of March 24, 1992, reference the above subject, this letter serves to notify you that the Patent and Trademark Office (PTO) has a "negative" response.

The PTO is not presently funding any environmental compliance projects and does not propose to undertake any environmental compliance projects for FY 1994.

I may be reached at 703-305-8183 for additional information or assistance.

Thomas J. Kilcullen

Thomas J. Kilcullen
Security Officer

UNITED STATES DEPARTMENT OF COMMERCE
Chief Financial Officer
Assistant Secretary for Administration
Washington, D.C. 20230

ORIGINAL

March 24, 1991

MEMORANDUM FOR: Commerce Task Force on Environmental Compliance
(See Distribution List Attached)

FROM: Richard J. Satterfield
Environmental Engineer,
Office of Federal Assistance
and Management Support

SUBJECT: A-106 Budget Submissions

The Department of Commerce has been informed by the Environmental Protection Agency (EPA) of the commencement of the fiscal year 1994 update of the Department's A-106 Pollution Abatement Plan. In response, our office is requesting participation from all operating units that are presently funding environmental projects, proposing to fund projects for FY'94 or have expended funds in the past for such projects.

Executive Order 12088, "Federal Compliance with Pollution Standards" makes the head of each executive agency responsible for seeing to it that the agency's facilities, programs and activities it funds meet Federal, State and local environmental requirements or to correct situations that are not in compliance with such regulations. In addition, the Executive Order requires each agency to ensure that sufficient funds for environmental compliance are included in the agency budget. The review process required by Executive Order 12088, OMB Circular A-106, and OMB Circular A-11 mandates the preparation of an annual budget plan by each federal agency. It further requires that EPA review each agencies submission to ensure conformance with established law(s), and to ensure the timely identification of future budget needs based on evolving federal, state and local requirements.

As mandated by DAO 216-17, "Compliance with Environmental Pollution Standards", and subparagraph 5.02f of that Order, bureaus and operating units of the Department shall ensure sufficient funding for environmental compliance projects and shall act in concert with Circular A-106. The DAO also mandates that the Office of Federal Assistance and Management Support (OFAMS) will coordinate this process and provide oversight of the A-106 budget data for pollution abatement projects submitted by each involved operating unit of the Department of Commerce.

Please update the enclosed computer printouts covering projects contained in the EPA A-106 database. These printouts reflect the information previously reported by your operating unit during the

last update. Verify the information and make any needed changes directly on the printouts in red ink. If you wish to add new projects to your A-106 submittal, please submit a completed EPA form 3500-7 form for each project. It is vitally important that each new project contain the correct federal facility identification number (FFID). EPA will reject any forms which do not contain this number. Please note that Section II.14 of the 3500-7 form has been modified this year to further assist federal agencies in tracking the progress of a project through the funding cycle. Instructions, codes and categories for completing your update, as well as specific directions on filling out EPA form 3500-7 are included with this package.

EPA has directed all federal agencies to submit the A-106 data no later than June 15, 1992. To comply with EPA's directive, it is vital that our office receive this data no later than May 15, 1992. If your bureau or unit has no revision to the data base, and has no proposed environmental projects for FY'94 please notify our office in writing by the May 15 deadline.

We appreciate your continuing cooperation in this process. If you have any questions regarding these instructions, please feel free to contact me on 377-4115.

Attachments

cc: Robert Heinemann

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

GIL WEIDENFELD
DIRECTOR
COMMISSION OF PATENTS & TRADEMARKS
PARK 1, SUITE 208B
WASHINGTON, DC 20231

Re: U.S. DEPT OF COMMERCE Compliance with CERCLA Section 120

Dear MR. WEIDENFELD:

As I am sure you are aware, your facility has been listed on the Federal Agency Hazardous Waste Compliance Docket (the docket) as of 02/12/88 in accordance with the requirements of Section 120 of the Comprehensive Environmental Response Compensation and Liability Act (CERCLA). EPA requires that all such facilities must submit to EPA a preliminary assessment (PA) within 18 months of being listed on the docket. The PA must provide data that will sufficiently allow EPA to evaluate the facility with the Hazard Ranking System (HRS) for potential listing on the National Priorities List (NPL).

To date, EPA has not received any documents to support the PA requirement. Enclosed is an HRS scoring checklist that indicates the data requirements needed to support the revised HRS (55 FR 51532). This data should be included in the PA for your facility.

Although EPA Region III recognizes that the HRS is new and complex for many users, the statutory deadlines of CERCLA still must be met. In fact, EPA is currently under a court order to evaluate the docket facilities as a result of a recent lawsuit by the Conservation Law Foundation.

To assist facilities in preparing the PAs, EPA Region III is conducting a 2-day conference in Annapolis, Maryland on June 19 through 20, 1991. The first day of the conference will include in-depth discussion on the new HRS as it relates to federal facilities. A draft agenda is enclosed. You should have already received a formal invitation to the conference. By sending this followup letter, it is our hope that technical representatives from your facility (those directly responsible for preparing the PA) will attend at least the 1-day HRS session and come prepared to discuss the unique characteristics of your facility. EPA has designed the session so that we can answer some of the specific questions that relate to your facility.

Printed on Recycled Paper

As always, if you have any technical questions regarding the enclosed material, please call Ms. Lisa Cunningham at (215) 597-0984.

Sincerely,

Henry J. Sokolowski
Chief, Federal Facilities Section

Enclosures

- Deficiency checklist
- Draft agenda

HRS SCORING DEFICIENCY CHECKLIST

Rec #: 119

EPA ID # VA3470090025
Federal Facility ID # VA3470090025
Facility Name U.S. DEPT OF COMMERCE

City ARLINGTON State VA Zip 22202

	INFORMATION IS PROVIDED? Y/N	ACCEPTABLE? Y/N*
1. OVERVIEW/SITE HISTORY		
1A. Reports submitted to EPA are referenced and copies of each reference are provided.	N	___
1B. Describe facility operations (manufacturing, storage, waste disposal practices, etc.) including the following:	N	___
1B1. History of the facility and sources (any area containing or potentially containing hazardous substances).	___	___
1B2. A topographic map with a 4-mile radius drawn around each source.	___	___
1B3. A facility and source location map and sketch.	___	___
1B4. Regulatory history of the facility (e.g., RCRA facility, TSCA, CERCLA, NPDES permits, etc.).	___	___
1C. Describe any emergency response actions or interim remedial actions that have occurred at the facility. Description should include amount of materials removed, disposal location, and sample analytical results prior and subsequent to removal.	N	___
1D. Describe any release of hazardous substances, pollutants, or contaminants to ground water, surface water, soil, or air and provide sampling results with detection limits, laboratory methods, and quality assurance procedures.	N	___
1E. Give the following population within each radius indicated below. Each radius should begin at the center of each source if the source is small or at the outer edge if the source is large. Count population in overlapping areas only once.	N	___
1E1. 0 - 1/4 mile	___	___
1E2. 1/4 - 1/2 mile	___	___
1E3. 1/2 - 1 mile	___	___
1E4. 1 - 2 mile	___	___
1E5. 2 - 3 mile	___	___
1E6. 3 - 4 mile	___	___

* Where information is provided but not acceptable, see attachment for a detailed explanation of why the information is not acceptable.

HRS SCORING DEFICIENCY CHECKLIST

Facility Name U.S. DEPT OF COMMERCE

	INFORMATION PROVIDED? Y/N	IS ACCEPTABLE? Y/N*
1F. Describe any prior spills (e.g., quantity of the spill, hazardous substances) that occurred at the facility.	N	___
1G. Describe facility and source security and access (e.g., fences, patrols, gates, etc.).	N	___
2. WASTE/SOURCE INFORMATION (see Section 2 of the HRS Final Rule - December 1990 Federal Register)		
2A. Describe as specifically as possible the types of wastes produced at the facility and the methods in which these wastes were treated, stored, or disposed.	N	___
2B. Describe as specifically as possible the amount (volume, weight, etc.) of each waste type produced and the form in which it was discharged or disposed (e.g., solid, liquid) at the facility.	N	___
2C. Describe each source type (e.g., landfill) located within the facility boundary.	N	___
2D. Describe as specifically as possible the constituents (concentrations of individual constituents) of each waste type disposed in each source.	N	___
2E. Describe as specifically as possible the amount of waste treated, stored, or disposed of in each source (e.g., landfills, impoundments, tanks).	N	___
2F. Determine the depth at which wastes were deposited in each source.	N	___
2G. Describe as specifically as possible the condition/integrity of each source (e.g., Do landfills have liners or caps?).	N	___
2H. Describe any secondary containment features/structures associated with each source (e.g., precipitation runon and runoff systems, leachate collection systems, gas collection systems).	N	___
2I. Describe the size, volume, capacity, and area of each source.	N	___
3. GROUND-WATER PATHWAY INFORMATION (see Section 3 of the HRS Final Rule - December 1990 Federal Register)		
3A. Determine if the ground water within a 4-mile radius of each source is used for any of the following purposes and locate the wells on a map. Each radius should begin at the center of each source if the source is small or at the outer edge if it is large. Provide the depth of each well.	N	___

* Where information is provided but not acceptable, see attachment for a detailed explanation of why the information is not acceptable.

HRS SCORING DEFICIENCY CHECKLIST

ORIGINAL (Red)

Facility Name U.S. DEPT OF COMMERCE

		INFORMATION IS PROVIDED? Y/N	ACCEPTABLE? Y/N*
3A1.	private or public drinking-water source	___	___
3A2.	irrigation of commercial food or commercial forage crops (include acres)	___	___
3A3.	commercial livestock watering	___	___
3A4.	commercial aquaculture	___	___
3A5.	water for major or designated recreational area, excluding drinking-water use	___	___
3A6.	standby wells used for drinking water at least once a year	___	___
3B.	Outline the public water distribution system within a 4-mile radius of each source on a topographic map.	N	___
3C.	Identify the nearest drinking-water well within a 4-mile radius of each source.	N	___
3D.	Determine the population (including workers, students, and residents) drawing from each drinking-water well within the following radii. Each radius should start at the center of each source if the source is small, or at the outer edge if it is large. Count population in overlapping areas only once.	N	___
3D1.	0 - 1/4 mile	___	___
3D2.	1/4 - 1/2 mile	___	___
3D3.	1/2 - 1 mile	___	___
3D4.	1 - 2 mile	___	___
3D5.	2 - 3 mile	___	___
3D6.	3 - 4 mile	___	___
3E.	Describe known or probable ground-water flow direction from each source.	N	___
3F.	Describe as specifically as possible the geology and hydrogeology of the facility area (including geological formation name, thickness, types of material, hydraulic conductivities, and depth to aquifers); provide references.	N	___
3G.	Discuss any evidence of aquitards and discontinuities between aquifers within a 4-mile radius of each source.	N	___
3H.	Describe any evidence of interconnections between the uppermost aquifer and lower aquifers within 2 miles of each source.	N	___
3I.	Estimate annual net precipitation at the facility.	N	___
3J.	Discuss soil or geologic conditions that might inhibit or facilitate ground-water migration.	N	___

* Where information is provided but not acceptable, see attachment for a detailed explanation of why the information is not acceptable.

HRS SCORING DEFICIENCY CHECKLIST

Facility Name U.S. DEPT OF COMMERCE

		INFORMATION IS PROVIDED? Y/N	ACCEPTABLE? Y/N*
3K.	Determine if sources are located in an area of Karst terrain.	N	___
3L.	Provide results from ground-water sampling of aquifers underlying the sources and from domestic wells (drinking water) within 2 miles of each source.	N	___
3M.	Provide results from background ground-water sampling of aquifers underlying the sources.	N	___
3N.	Determine if any areas within a 4-mile radius of each source are located in a Wellhead Protection Area according to Section 1428 of the Safe Drinking Water Act.	N	___
4.	**SURFACE-WATER PATHWAY INFORMATION (see Section 4 of the HRS Final Rule - December 1990 Federal Register)**		
4A.	Describe surface-water bodies 0 to 15 miles downstream of each source and provide a map of surface-water bodies receiving drainage from each source.	N	___
4B.	Discuss the probable surface runoff pattern from each source to surface waters, including the distance to the nearest surface-water body; provide a map.	N	___
4C.	Describe the point(s) at each source where hazardous substances begin to migrate and their probable point(s) of entry into a surface-water body (including ponds, lakes, streams, etc.).	N	___
4D.	Identify if surface water drawn from intakes within 15 miles downstream of the probable point of entry is used for any of the following purposes:	N	___
4D1.	irrigation (5-acre minimum) of commercial food or commercial forage crops	___	___
4D2.	watering of commercial livestock	___	___
4D3.	ingredient in commercial food preparation	___	___
4D4.	major or designated water recreation area, excluding drinking water	___	___
4E.	Identify the following targets associated with surface-water bodies 0 to 15 miles downstream of the probable point of entry:	N	___
4E1.	population (residents, workers, and students) served by intakes of drinking water	___	___

* Where information is provided but not acceptable, see attachment for a detailed explanation of why the information is not acceptable.

HRS SCORING DEFICIENCY CHECKLIST

Facility Name U.S. DEPT OF COMMERCE

		INFORMATION IS PROVIDED? Y/N	ACCEPTABLE? Y/N*
4E2.	sensitive environments (see Table 4-23, December 1990 Federal Register) and critical habitats for federally endangered or threatened species	___	___
4E3.	economically important resources (e.g., shellfish)	___	___
4E4.	any portion of the surface water designated by a state for drinking-water use under Section 305(a) of the Clean Water Act; or any portion of surface water usable for drinking water	___	___
4F.	Determine the miles of wetlands (wetland frontage) along surface-water bodies 0 to 15 miles downstream from the probable point of entry (see 40 CFR section 230.3).	N	___
4G.	Provide results from sampling of wetlands and/or sensitive environments 0 to 15 miles downstream of each source.	N	___
4H.	Discuss any qualitative, quantitative, or circumstantial evidence of contamination of surface waters from sources.	N	___
4I.	Provide results from sediment and surface-water sampling for points 0 to 15 miles downstream of each source.	N	___
4J.	Provide results from background sediment and surface-water sampling.	N	___
4K.	Provide results from sampling of surface-water intakes 0 to 15 miles downstream of each source.	N	___
4L.	Estimate the size of the upgradient drainage area for each source.	N	___
4M.	Determine the 2-year, 24-hour rainfall for the site.	N	___
4N.	Discuss the average annual streamflow associated with each surface-water body located 0 to 15 miles downstream of each source.	N	___
4O.	Determine surface soil types at the facility.	N	___
4P.	Determine if sources are located in a 1-year, 10-year, 100-year, or 500-year flood plain.	N	___
4Q.	Discuss fisheries (recreational or commercial) in surface-water bodies 0 to 15 miles downstream of each source:	N	___
4Q1.	Describe annual production (in pounds) of human food chain organisms (e.g., trout, shellfish, snapping turtles, crabs) per acre of streams and rivers 0 to 15 miles downstream of each source.	___	___

* Where information is provided but not acceptable, see attachment for a detailed explanation of why the information is not acceptable.

HRS SCORING DEFICIENCY CHECKLIST

Facility Name U.S. DEPT OF COMMERCE

	INFORMATION IS PROVIDED? Y/N	ACCEPTABLE? Y/N*
4Q2. Describe annual production (in pounds) of human food chain organisms (e.g., trout, shellfish, snapping turtles, crabs) per acre of ponds, lakes, bays, or oceans 0 to 15 miles downstream of each source.	___	___
4R. Identify closed fisheries 0 to 15 miles downstream of each source.	N	___
4S. Provide results from sampling of human food chain organism tissues in streams and rivers 0 to 15 miles downstream of each source and in ponds, lakes, and bays that receive drainage from the sources.	N	___
5. AIR PATHWAY INFORMATION (see Section 6 of the HRS Final Rule - December 1990 Federal Register)		
5A. Describe if there has been an observed release (i.e., visual or analytical evidence) of a hazardous substance to the atmosphere.	N	___
5B. Determine the shortest distance to the closest residence or regularly occupied building or area from any on-site source.	N	___
5C. Determine if any of the following resources are located within a 1/2-mile radius of each source	N	___
5C1. commercial agriculture	___	___
5C2. commercial silviculture	___	___
5C3. major or designated recreation area	___	___
5D. Determine if sensitive environments are within a 4-mile radius of each source.	N	___
5E. Determine the total area of wetlands within a 4-mile radius of each source.	N	___
6. SOIL-EXPOSURE PATHWAY INFORMATION (see Section 5 of the HRS Final Rule - December 1990 Federal Register)		
6A. Describe any areas of contamination that are within 2 feet of the ground surface; provide the areal extent of contamination.	N	___
6B. Provide locations and depths of soil samples and results.	N	___
6C. Provide results of background soil sampling.	N	___

* Where information is provided but not acceptable, see attachment for a detailed explanation of why the information is not acceptable.

HRS SCORING DEFICIENCY CHECKLIST

Facility Name U.S. DEPT OF COMMERCE

		INFORMATION IS PROVIDED? Y/N	ACCEPTABLE? Y/N*
6D.	Describe the measures taken to limit access to areas with soil contamination within 2 feet of the surface (e.g., fences, security guards).	N	___
6E.	Determine if any of the following are located near or within an area of soil contamination (within 2 feet of the surface); provide the number of individuals for 6E1 and 6E2:	N	___
6E1.	within 200 feet of any residences, schools, or day care centers and within the property boundary	___	___
6E2.	within 200 feet of the work place area and within a work place property boundary	___	___
6E3.	within boundaries of commercial agriculture, silviculture, livestock production, or grazing area	___	___
6E4.	within boundaries of a terrestrial-sensitive environment (see Table 5-5, December 1990 Federal Register)	___	___
6F.	Determine the number of individuals who live, work, or attend school within the following distances of soil contamination (within 2 feet of the surface).	N	___
6F1.	0 - 1/4 mile radius	___	___
6F2.	1/4 - 1/2 mile radius	___	___
6F3.	1/2 - 1 mile radius	___	___

* Where information is provided but not acceptable, see attachment for a detailed explanation of why the information is not acceptable.

ORIGINAL

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

Preliminary Assessment (Abbreviated)

Site Name: Dept of Commerce

Discovery Date: 04/09/1991

Address: P.O. Box 6-F16

CERCLIS ID#: VA3470090025

Dump Site #: VA-596

This site was initially identified (discovered) and assessed by EPA's Federal Facilities Program, as described in the attached documentation. This abbreviated Preliminary Assessment evaluates the site, using the Federal Facilities information, according to the criteria of the Hazard Ranking System ("HRS") model.

Waste Characteristics:

Sources remaining?: __ Yes x No

If yes, probable waste characteristics factor value: __ Low __ Medium __ High

Likelihood of Release/Exposure and Targets:

Pathway	Likelihood of Release/Exposure				Targets/Receptors (probable targets factor value)		
	Potential to Release			Observed Release			
	Low	Medium	High		Low	Medium	High
Groundwater Migration	x				x		
Surface Water Migration	x				x		
Soil Exposure	x				x		
Air Migration	x				x		

Overall:

HRS Score is expected to be: (b) (5) [redacted]

Recommendation for further action:

x None __ Full PA __ SI __ State Program: _____

__ Integrated Assessment w/ Removal __ Removal __ Other: _____

Prepared by: Charlene C. Creamer 10/7/2004
(Charlene C. Creamer, Site Assessment Manager) (Date)

ORIGINAL

UNITED STATES DEPARTMENT OF COMME
Patent and Trademark Office
ASSISTANT SECRETARY AND COMMISSIONER
OF PATENTS AND TRADEMARKS
Washington, D.C. 20231

August 3, 1993

Ms. Yazmine Yap
Site Assessment Manager
U.S. Environmental Protection Agency
841 Chestnut Street
Philadelphia, PA. 19107

RECEIVED
1993
SITE ASSESSMENT SECTION

Mailbox: 3HW73

Dear Ms. Yap:

This correspondence is in reference to a conversation I had on July 30, 1993 with (b) (4) [redacted] a contractor with EPA, phone (b) (4) [redacted] That conversation concerned the facility known as "Arlington File Repository Site". She suggested I write to you about the docket status of the Arlington site (it still appears on the EPA "docket"), and about the contention that this site may be registered as a violator, allegedly having had a spill or accident at the site.

The attached documents will substantiate the efforts made in 1992 to comply with EPA directives relative to this matter. Other documents are also provided for your use, hoping they will afford you the insight needed to place the Arlington site into its proper historical place. These other documents relate to a similar situation with the records of the state of Virginia, and also to A-106 budget considerations, which may be generally helpful to you as further background information.

I would submit that the Arlington site should be eliminated from any current dockets in the EPA registers or from current lists under any other applicable Federal laws or regulations. I would further request that corrections be made to historical documents to properly reflect the true status of this facility for the years when it did generate a very small quantity of hazardous waste. I believe the Arlington site never was a "generator" or "large quantity generator". Please note that this site never generated or stored more waste than the quantities noted in the attached documents. Also please be advised, and please correct all records relating to spill/accident events; this site never experienced any such event.

ORIGINAL

This memorandum is not intended to place a labor intensive burden on you or your staff; however, neither am I anxious to repeat what I thought had been done before. If the attached documents are not sufficient to correct the existing status of this site, I will be glad to assist with additional information and/or supplemental documents to close out all questions about this site once and for all.

Upon receipt of this letter please call me at 703-305-8183 for additional discussion as I am anxious to resolve this matter. Thank you.

Sincerely:

Thomas J. Kilcullen

Thomas J. Kilcullen
Security/Safety Officer

Attachments

PRC Environmental Management, Inc.
1700 Sansom Street
Suite 403
Philadelphia, PA 19103
215-972-0444
Fax 215-972-0484

PRC

September 14, 1993

(b) (4)(b) (4)
Subcontractor Monitor Dynamac Corporation
80 West Lancaster Avenue
Devon, Pennsylvania 19333

Contract No.:	68-W9-0005
Work Assignment No.:	C03062
Subject:	Department of Commerce Site Evaluation

Dear (b) (4)

Please find enclosed the Site Evaluation Memorandum for the Department of Commerce facility. PRC Environmental Management, Inc. (PRC) is submitting this memorandum to you as deliverable for work assignment C03062.

Please call me at (b) (4) if you have any questions or comments.

Sincerely,

(b) (4)

Project Manager

enclosures

cc: (b) (4) TES VIII Program Manager

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1700 Sansom Street
Suite 403
Philadelphia, PA 19103
215-972-0444
Fax 215-972-0484

PRC

MEMORANDUM

Date: September 14, 1993

To: (b) (4) Subcontractor Monitor, Dynamac Corporation

From: (b) (4) PRC Environmental Management, Inc.

Subject: Site Evaluation
Department of Commerce
Arlington, Virginia
Federal Facility ID No.: VA3470090025
EPA ID No.: VA3470090025
Dump Site No.: VA-596

Background

The Department of Commerce facility was listed on the Federal Facility Hazardous Waste Compliance Docket on December 12, 1988. The reporting mechanism for the listing was a RCRA 3010 (Notification of Hazardous Waste Activity) that was submitted on October 6, 1986. The notification indicated that the facility was a generator of hazardous waste (EPA hazardous waste number F002, chlorinated solvents). According to representatives of the Department of Commerce, the notification should have indicated that the facility was a small quantity generator (less than 1,000 kilograms per month were generated). The hazardous wastes were generated from printing operations conducted at the facility.

From an undetermined date until 1990 or 1991, the facility was a warehouse leased from the Cafritz Company by the Department of Commerce for storage of paper (files) and for a small printing operation. Liquid wastes were generated by the printing operation. The actual types (constituents) of liquid wastes generated are not known. However, it is known that less than 55 gallons of liquid wastes were generated and disposed of off site every six months. Wastes were stored in a drum storage area before they were disposed of off site.

Recommendations

Because small quantities of wastes were generated and were disposed of off site, a designation of site evaluation accomplished (SEA) is recommended for this facility.

ORIGINAL

Site Assessment CERCLIS/WasteLAN Data Entry Form
EPA Region III - Brownfields & Site Assessment Section (3HS34)

See Code Guide for Instructions

Site Name: DEPT. OF COMMERCE

WasteLAN ID#: 03 DSN: _____ EPA ID#: VA3470090025

Site-Level Data

Edit CERCLIS/WasteLAN Identifying Information: (Site Name, Address, City, County, County ID, State, Zip Code)

Explain: FEDERAL FACILITY

Site Type: *(See Attachment A for a list of valid options)* _____

Non-NPL Status: *(See Attachment A for a list of valid options)* NF : NFRAP

Collapsed Site Name: *(Enter the 'child' site to be merged into the 'parent' site above)* _____ **ID#:** _____

Parent/Child Relationship: _____

☐ **ERS Exclusion:** *(An ERS Exclusion Determination Form must be completed)* **ERS Exclusion Date:** _____

☐ **NFFA (No Further Federal Action)** **NFFA Date:** _____

☑ **Archive** *(See Attachment A: Prohibited Open Actions at Archived Sites)* **Archive Date:** 10/7/2004

☐ **RCRA Deferral Audit Special Initiative** ☐ Lead Confirmed ☐ New Decision ☐ Further Superfund Assessment

Action-Level Data

Action Name	Lead	Start Date	Compl.Date	Qualifier
Pre-CERCLIS Screening (HX)	F EP	/ /	/ /	
Site Discovery (DS)	F EP FF S TR		/ /	
Preliminary Assessment (PA)	F (EP) S TR	04 09 91	10 7 2004	A D F H L (N) W DN B SA
Fed Fac Preliminary Assessment Review (RX)	F EP S TR	/ /	/ /	A D H L N DN B SA
Site Inspection (SI)	F EP S TR	/ /	/ /	A D F H L N W DN B SA
Combined PA/SI (NX)	F EP S TR	/ /	/ /	A D F H L N W DN B SA
Site Inspection Prioritization (SH)	F EP S TR	/ /	/ /	A D F H L N W DN B SA
Site Reassessment (OO)	F EP S TR	/ /	/ /	A D F H L N W DN B SA
Expanded Site Inspection (ES)	F EP S TR	/ /	/ /	A D F G L N W DN B SA
Fed Fac Site Inspection Review (TY)	F EP S TR	/ /	/ /	A D H L N DN B SA
Fed Fac ESI Review (TZ)	F EP S TR	/ /	/ /	A D G L N DN B SA
ESI/RI (SS)	F EP S TR	/ /	/ /	A D F G L N W DN B SA
HRS Package (HR)	F EP S TR	/ /	/ /	D F N O W DN SA
Int. Rmvl Assess and Preliminary Assess (QT)	F EP S TR	/ /	/ /	A D F H L N W DN B SA
Int. Rmvl Assess and Site Inspection (QJ)	F EP S TR	/ /	/ /	A D F H L N W DN B SA
Int. Rmvl Assess and SI Prioritization (QO)	F EP S TR	/ /	/ /	A D F H L N W DN B SA
Int. Rmvl Assess and Combined PA/SI (OU)	F EP S TR	/ /	/ /	A D F H L N W DN B SA
Int. Rmvl Assess and ESI/RI (OV)	F EP S TR	/ /	/ /	A D F G H L N W DN B SA
Int. Rmvl Assess and ESI (OY)	F EP S TR	/ /	/ /	A D F G H L N W DN B SA
Int. Rmvl Assess and HRS Package (OZ)	F EP S TR	/ /	/ /	A D F H L N W DN B SA
Other Cleanup Activity (VA)	FF SR PS RP SE S SN TR	/ /	/ /	H L
☐ Comprehensive Site Investigation ☐ Remedy Selection ☐ Construction		/ /	/ /	
☐ Post-Construction Maintenance ☐ Design ☐ Short Term Cleanup				
Laboratory Support (LA) Start Date - date site is initiated Completion Date - date site is archived	F EP FF MR SR PS RP SD S SN TR	/ /	/ /	
Comfort / Status Letter Start Date - date letter requested Completion Date - date of letter	FE	/ /	/ /	WL RE

Authorization (SAM) Signature & Date	Removal Info. Mgmt. Assistant Signature & Date	Data Quality Coord. Signature & Date
Charlene C. Cramer 10/7/2004		

SA01- revised 02/2004

ORIGINAL

REMEDIAL SITE ASSESSMENT DECISION - EPA REGION 3

Site Name: Dept of Commerce **EPA ID#:** VA3470090025 **DSN:** VA-596

Alias Site Names: _____

City: Arlington **County:** Arlington **State:** VA

Refer to Reports Dated: September 14,1993 **Report type:** Site Evaluation Memorandum

Report developed by: Contractor for EPA Region III - Federal Facilities Section

DECISION:

|x| **1. Further Remedial Site Assessment under CERCLA (Superfund) is not required because:**

|x| 1a. Site does not qualify for further remedial site assessment under CERCLA (No Further Remedial Action Planned – NFRAP)

| | 1b. Site may qualify for further action, but is deferred to: | | RCRA | | NRC

| | **2. Further Assessment Needed Under CERCLA:** 2a. (optional) Priority: | | Higher | | Lower

2b. Activity Type: | | PA | | SI | | ESI | | HRS evaluation | | Other:_____

ORIGINAL

DISCUSSION/RATIONALE:

This investigation was performed in order to gather the data necessary to evaluate the site as a candidate for the National Priorities List (NPL).

By letter dated August 3, 1993, EPA Region III's Federal Facilities Program received correspondence regarding the facility status of the Department of Commerce site located in Arlington, Virginia. The U.S. Department of Commerce requested that the Arlington, Virginia facility be removed from the non-compliance lists and be reclassified as a small quantity generator and not a large quantity generator. The U.S. Department of Commerce also provided documentation to illustrate that there were no spills or releases at the Arlington, Virginia facility. The Arlington, Virginia facility generated liquid hazardous wastes from a small printing operation. The quantity of wastes was less than 55 gallons of liquid which was disposed off-site every six (6) months.

The EPA Federal Facilities Program's contractor prepared a memorandum dated September 14, 1993, providing recommendations for the site. Based on the information in the memorandum regarding the small quantities of wastes being generated and disposed of off-site, and that there was no evidence of spills at the facility at that time, no further actions by EPA are anticipated at the site.

Pathways of Concern:

Air Migration Pathway: There was no evidence of contamination within the air migration pathway; therefore, the probability of contact with these receptors is low.

Groundwater Migration Pathway: There was no evidence of groundwater contamination; therefore, the probability of adverse impact to the drinking water is negligible.

Soil Exposure Pathway: There was no evidence of soil contamination exposure since there was no contact with the soil and the probability of adversely impacting the soil is minimal.

Surface Water Migration Pathway: There was no evidence of adverse exposure to a surface water pathway within a four (4) mile radius that would impact drinking water, the human food chain, or the environment. Therefore, the probability of contact with these receptors is low.

Based on this information, the site does not qualify for further evaluation as a candidate for the National Priorities List and the site will be qualified as No Further Remedial Action Planned (NFRAP) in the CERCLA data base.

This report was prepared based on information provided in the memorandum to the Federal Facilities Section, which may be found in the site file.

Report Reviewed/Approved: Charlene C. Creamer 10/7/2004
Site Decision Made By: Charlene C. Creamer **Signature:** Lynda A. Rau **Date:** 10/07/04
Site Assessment Manager

EPA Form # 9100-3

Site Assessment CERCLIS/WasteLAN Data Entry Form
EPA Region III - Brownfields & Site Assessment Section (3HS34)

See Code Guide for Instructions

Site Name: DEPT. OF COMMERCE

WasteLAN ID#: 03 DSN: VA-596 EPA ID#: VA3470090025

Site-Level Data

Edit CERCLIS/WasteLAN Identifying Information: (Site Name, Address, City, County, County ID, State, Zip Code)

Explain: FEDERAL FACILITY

Site Type: *(See Attachment A for a list of valid options)*

Non-NPL Status: *(See Attachment A for a list of valid options)* NF : NFRAP

Collapsed Site Name: *(Enter the 'child' site to be merged into the 'parent' site above)* ID#:

Parent/Child Relationship:

☐ **ERS Exclusion:** *(An ERS Exclusion Determination Form must be completed)* ERS Exclusion Date:

☐ **NFFA (No Further Federal Action)** NFFA Date:

☑ **Archive** *(See Attachment A: Prohibited Open Actions at Archived Sites)* Archive Date: 10/7/2004

☐ **RCRA Deferral Audit Special Initiative** ☐ Lead Confirmed ☐ New Decision ☐ Further Superfund Assessment

Action-Level Data

Action Name	Lead	Start Date	Compl.Date	Qualifier
Pre-CERCLIS Screening (HX)	F EP	/ /	/ /	
Site Discovery (DS)	F EP FF S TR		/ /	
Preliminary Assessment (PA)	F EP S TR	04 09 91	10 7 2004	A D F H L N W DN B SA
Fed Fac Preliminary Assessment Review (RX)	F EP S TR	/ /	/ /	A D H L N DN B SA
Site Inspection (SI)	F EP S TR	/ /	/ /	A D F H L N W DN B SA
Combined PA/SI (NX)	F EP S TR	/ /	/ /	A D F H L N W DN B SA
Site Inspection Prioritization (SH)	F EP S TR	/ /	/ /	A D F H L N W DN B SA
Site Reassessment (OO)	F EP S TR	/ /	/ /	A D F H L N W DN B SA
Expanded Site Inspection (ES)	F EP S TR	/ /	/ /	A D F G L N W DN B SA
Fed Fac Site Inspection Review (TY)	F EP S TR	/ /	/ /	A D H L N DN B SA
Fed Fac ESI Review (TZ)	F EP S TR	/ /	/ /	A D G L N DN B SA
ESI/RI (SS)	F EP S TR	/ /	/ /	A D F G L N W DN B SA
Package (HR)	F EP S TR	/ /	/ /	D F N O W DN SA
Rmvl Assess and Preliminary Assess (QT)	F EP S TR	/ /	/ /	A D F H L N W DN B SA
Int. Rmvl Assess and Site Inspection (QJ)	F EP S TR	/ /	/ /	A D F H L N W DN B SA
Int. Rmvl Assess and SI Prioritization (QO)	F EP S TR	/ /	/ /	A D F H L N W DN B SA
Int. Rmvl Assess and Combined PA/SI (OU)	F EP S TR	/ /	/ /	A D F H L N W DN B SA
Int. Rmvl Assess and ESI/RI (OV)	F EP S TR	/ /	/ /	A D F G H L N W DN B SA
Int. Rmvl Assess and ESI (OY)	F EP S TR	/ /	/ /	A D F G H L N W DN B SA
Int. Rmvl Assess and HRS Package (OZ)	F EP S TR	/ /	/ /	A D F H L N W DN B SA
Other Cleanup Activity (VA)	FF SR PS RP SE S SN TR	/ /	/ /	H L
☐ Comprehensive Site Investigation ☐ Remedy Selection ☐ Construction		/ /	/ /	
☐ Post-Construction Maintenance ☐ Design ☐ Short Term Cleanup				
Laboratory Support (LA) Start Date - date site is initiated Completion Date - date site is archived	F EP FF MR SR PS RP SD S SN TR	/ /	/ /	
Comfort / Status Letter Start Date - date letter requested Completion Date - date of letter	FE	/ /	/ /	WL RE

Charles P. Cramer 10/7/2004		
Authorization (SAM) Signature & Date	Removal Info. Mgmt. Assistant Signature & Date	Data Quality Coord. Signature & Date

SA01- revised 02/2004

REMEDIAL SITE ASSESSMENT DECISION - EPA REGION 3

FILE ORIGINAL

Site Name: Dept of Commerce **EPA ID#:** VA3470090025 **DSN:** VA-596

Alias Site Names: _____

City: Arlington **County:** Arlington **State:** VA

Refer to Reports Dated: September 14,1993 **Report type:** Site Evaluation Memorandum

Report developed by: Contractor for EPA Region III - Federal Facilities Section

DECISION:

| x | **1. Further Remedial Site Assessment under CERCLA (Superfund) is not required because:**

| x | 1a. Site does not qualify for further remedial site assessment under CERCLA (No Further Remedial Action Planned – NFRAP)

| | 1b. Site may qualify for further action, but is deferred to: | | RCRA | | NRC

2. Further Assessment Needed Under CERCLA:

2a. (optional) Priority: | | Higher | | Lower

2b. Activity Type: | | PA | | SI | | ESI | | HRS evaluation | | Other:_____

FFE ORIGINAL

DISCUSSION/RATIONALE:

This investigation was performed in order to gather the data necessary to evaluate the site as a candidate for the National Priorities List (NPL).

By letter dated August 3, 1993, EPA Region III's Federal Facilities Program received correspondence regarding the facility status of the Department of Commerce site located in Arlington, Virginia. The U.S. Department of Commerce requested that the Arlington, Virginia facility be removed from the non-compliance lists and be reclassified as a small quantity generator and not a large quantity generator. The U.S. Department of Commerce also provided documentation to illustrate that there were no spills or releases at the Arlington, Virginia facility. The Arlington, Virginia facility generated liquid hazardous wastes from a small printing operation. The quantity of wastes was less than 55 gallons of liquid which was disposed off-site every six (6) months.

The EPA Federal Facilities Program's contractor prepared a memorandum dated September 14, 1993, providing recommendations for the site. Based on the information in the memorandum regarding the small quantities of wastes being generated and disposed of off-site, and that there was no evidence of spills at the facility at that time, no further actions by EPA are anticipated at the site.

Pathways of Concern:

Air Migration Pathway: There was no evidence of contamination within the air migration pathway; therefore, the probability of contact with these receptors is low.

Groundwater Migration Pathway: There was no evidence of groundwater contamination; therefore, the probability of adverse impact to the drinking water is negligible.

Soil Exposure Pathway: There was no evidence of soil contamination exposure since there was no contact with the soil and the probability of adversely impacting the soil is minimal.

Surface Water Migration Pathway: There was no evidence of adverse exposure to a surface water pathway within a four (4) mile radius that would impact drinking water, the human food chain, or the environment. Therefore, the probability of contact with these receptors is low.

Based on this information, the site does not qualify for further evaluation as a candidate for the National Priorities List and the site will be qualified as No Further Remedial Action Planned (NFRAP) in the CERCLA data base.

This report was prepared based on information provided in the memorandum to the Federal Facilities Section, which may be found in the site file.

Report Reviewed/Approved: Charlene C. Creamer 10/7/2004
Site Decision Made By: Charlene C. Creamer
Site Assessment Manager
Signature: Linda A. Bush **Date:** 10/07/04

EPA Form # 9100-3

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

Preliminary Assessment (Abbreviated)

Site Name: Dept of Commerce

Discovery Date: 04/09/1991

Address: P.O. Box 6-F16

CERCLIS ID#: VA3470090025

Dump Site #: VA-596

This site was initially identified (discovered) and assessed by EPA's Federal Facilities Program, as described in the attached documentation. This abbreviated Preliminary Assessment evaluates the site, using the Federal Facilities information, according to the criteria of the Hazard Ranking System ("HRS") model.

Waste Characteristics:

Sources remaining?: ___ Yes x No

If yes, probable waste characteristics factor value: ___ Low ___ Medium ___ High

Likelihood of Release/Exposure and Targets:

Pathway	Likelihood of Release/Exposure				Targets/Receptors (probable targets factor value)		
	Potential to Release			Observed Release			
	Low	Medium	High		Low	Medium	High
Groundwater Migration	x				x		
Surface Water Migration	x				x		
Soil Exposure	x				x		
Air Migration	x				x		

Overall:

HRS Score is expected to be: (b) (5) [redacted]

Recommendation for further action:

x None ___ Full PA ___ SI ___ State Program: ___

___ Integrated Assessment w/ Removal ___ Removal ___ Other: ___

Prepared by: Charlene C. Creamer 10/7/2004
(Charlene C. Creamer, Site Assessment Manager) (Date)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

JUN 2 0 1988

Certified Mail
Return Receipt Requested

GAIL WILSON
U S DEPT OF COMMERCE
GENERAL SERVICES ADMINISTRATION
FILE REPOSITORY 1232 S EAST
WASHINGTON, DC 22202

Re: Federal Agency Hazardous Waste Compliance Docket

Dear Ms. Wilson:

Section 120(c) of the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. Section 9620(c), as amended by the Superfund Amendments and Reauthorization Act of 1986 Pub. Law 99-499 ("CERCLA") directed the Administrator of the Environmental Protection Agency ("EPA") to establish a Federal Agency Hazardous Waste Compliance Docket ("Docket") containing information regarding federal facilities that manage hazardous waste, or have potential hazardous waste problems. On February 12, 1988, EPA published the list of federal facilities which comprise the initial Docket (53 Fed. Reg. 4280). This Docket included your facility (U S DEPT OF COMMERCE). Prior to publication of the Docket you and/or your Agency were notified by EPA of the potential inclusion of your facility, and the statutory deadlines established by CERCLA.

As stated in our previous correspondence, CERCLA required the responsible Federal Agency to submit the information necessary for EPA's completion of a Hazard Ranking System (HRS) evaluation by April 19, 1988 for each facility on the Docket. The information required includes a Preliminary Assessment and a Site Inspection or the equivalent Installation Restoration Program reports for Department of Defense facilities.

EPA Region III has not received the required information from your facility.

Within 30 (thirty) days of receipt of this letter, please submit to the Region III Docket Coordinator identified below the information required by EPA to perform a full HRS evaluation of your facility.

If you, or your Agency, have submitted comments to EPA requesting removal of your facility from the Docket, provide the reason for the request and copies of any correspondence in your reply. Facilities which EPA determines do not meet the criteria for inclusion on the Docket will be removed in a Docket correction currently scheduled for Federal Register publication in August, 1988.

The requested information should be submitted to:

Steven Hirsh (3HW17)
Docket Coordinator
US EPA Region III
841 Chestnut Bldg.
Phila., PA. 19107

This follow-up information request is being made pursuant to the authority of Section 104(e) of CERCLA, 42 U.S.C. Section 9604(e). Failure to comply with this request may result in issuance of an order requiring compliance or a civil action to compel compliance including a civil penalty of up to $25,000 for each day of noncompliance. 42 U.S.C. Section 9604(e)(5).

This collection of information is not subject to review by the Office of Management and Budget pursuant to the Paperwork Reduction Act. 44 U.S.C. Sections 3501 - 3520.

If you have any questions, please call Mr. Hirsh at (215)597-0549.

Sincerely,

Bruce P. Smith, Chief
Hazardous Waste Enforcement Branch

(Red)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

CERTIFIED MAIL
Return Receipt Requested

JUN 20 1988

GAIL WILSON
U S DEPT OF COMMERCE
GENERAL SERVICES ADMINISTRATION
FILE REPOSITORY 1232 S E
ARLINGTON, VA 22202

Re: Federal Agency Hazardous Waste Compliance Docket

Dear Ms. Wilson:

Section 120(c) of the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. Section 9620(c), as amended by the Superfund Amendments and Reauthorization Act of 1986 Pub. Law 99-499 (CERCLA) directed the Administrator of the Environmental Protection Agency (EPA) to establish a Federal Agency Hazardous Waste Compliance Docket (Docket) which contains information regarding Federal facilities that manage hazardous waste, or have potential hazardous waste problems. On February 12, 1988, EPA published the list of federal facilities which comprise the initial Docket (53 Fed. Reg.4280). This Docket included your facility (U S DEPT OF COMMERCE). Prior to publication of the Docket you and/or your Agency were notified by EPA of the potential inclusion of your facility, and the statutory deadlines established by CERCLA.

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EPA Region III has not received the required information from your facility.

ORIGINAL
(Red)

Within 30 (thirty) days of receipt of this letter, please submit to the Region III Docket Coordinator identified below the information required by EPA to perform a full HRS evaluation of your facility.

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Steven Hirsh (3HW17)
Docket Coordinator
US EPA Region III
841 Chestnut Bldg.
Phila., PA. 19107

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If you have any questions, please call Mr. Hirsh at (215)597-0549.

Sincerely,

Bruce P. Smith, Chief
Hazardous Waste Enforcement Branch

(b) (4)

[redacted]

OFFICIAL FILE COPY

•U.S. GPO : 1986-159-319

ORIGINAL
(Red)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III

841 Chestnut Building
Philadelphia, Pennsylvania 19107

WILSON, GAIL ASS MGR
U S DEPT OF COMMERCE
GENERAL SERVICES ADMINISTRATION.

FILE REPOSITORY 1232 S E*
ARLINGTON, DC 22202

V43470090025

Re: Federal Agency Hazardous Waste Compliance Docket

Dear WILSON, GAIL ASS MGR:

Section 120 of the Superfund Amendments and Reauthorization Act (SARA) directed the Administrator of the EPA to establish a Federal Agency Hazardous Waste Compliance Docket. By April 1988 agencies must submit to EPA information required to complete a hazard ranking score (HRS) for of each facility on the docket. That information includes a Preliminary Assessment (PA) and a Site Inspection (SI). By April 1989 EPA must determine which facilities should be placed on the national priorities list (NPL). Once a facility is listed on the NPL, the agency must begin a remedial investigation and feasibility study within 6 months and must undertake "substantial continuous" remedial action within 15 months of the feasibility study's completion.

Although the Docket has not been published in the Federal Register, the deadline for submission of the hazard ranking information remains April 1988. Facilities which have submitted information to EPA under sections 3005, 3010, or 3016 of the Resource Conservation and Recovery Act, or section 103 of Superfund will be included in the docket. Your facility will be included on the Docket.

Enclosed is a copy of the EPA Potential Hazardous Waste Site PA form, the EPA SI form, and a user's manual for the Hazardous Waste Site Ranking System. The completed PA and SI forms should be returned to Region III by April 17, 1988. Department of Defense Installation Restoration Program reports may be submitted in lieu of, or in addition to the forms if the reports contain all the information EPA will require to complete the HRS.

ORIGINAL
(Red)

Based on the findings of the PA, your agency may determine that no further actions are required. If this is the case, the PA report should be submitted to the EPA and to the State. EPA will review the report and concur or not concur with the determination. If EPA and the State agree that no further action is required, the information will be entered into the docket. If EPA does not agree, you will be notified that more information is needed for the HRS evaluation.

General questions regarding the Docket should be referred to :

Steven Hirsh (3HW17)
US EPA Region III
841 Chestnut Bldg.
Philadelphia, PA 19107
(215) 597-0549

Questions related to the Preliminary Assessment and Site Inspection should be referred to:

Robert Panabianco (3HW23)
US EPA Region III
841 Chestnut Bldg.
Philadelphia, PA 19107
(215) 597-8333

Thank you for your cooperation.

Sincerely,

Steven R. Hirsh
Docket Coordinator