Office of Enforcement, Compliance and Environmental Justice
Multi-Media Investigation

Super Salvage
1711 1st Street SW
Washington, D.C. 20024-3404

Date of Investigation: May 28 – 29, 2013

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Facility Representatives:	Bob Bullock Chief Financial Officer
	John Keller Manager of Scrap Yard

Background

The Government of the District of Columbia's Department of the Environment (DDOE) conducted a routine inspection at the Super Salvage facility located at 1711 1st Street in Washington, D.C. on March 30, 2010. During the inspection, the DDOE inspectors observed various types of fluids leaking from storage boxes, automotive parts, and also from buildings on the property. The onsite representative, Mr. Robert Bullock, stated that all fluids are collected in a depression near the center of the facility, and from there the fluids are pumped to a pond behind the facility building. The DDOE inspectors said that another onsite employee stated that a contractor came to the facility and pumped the fluids from the depression and removed them from the site. There was no documentation on site at the time of the inspection to indicate that this occurred. The DDOE inspectors observed the pond area behind the building and noted that it was filled with water and various unknown fluids. The DDOE inspectors also reported that operations at the facility have resulted in severe contamination to soil in and around the property. The inspectors indicated that best management practices and spill prevention plans were very poor or non-existent. They also indicated the maintenance of disposal records and/or manifests was very poor. The DDOE inspectors recommended that a multi-media inspection be conducted at the facility to by District and Federal inspectors. A copy of their inspection report is provided as an attachment to this report (See Attachment No. 1).

On February 20, 2013, an NPDES Construction and Industrial Stormwater Inspection was conducted with contractor support by EPA, Region III's NPDES Enforcement Branch and DDOE at the Super Salvage facility. A summary report indicated that the facility had no records of a Notice of Intent for Stormwater Discharges Associated with Industrial Activity, which is required for coverage under EPA's 2008 Multi-Sector General Permit. The facility representative, Mr. Bullock, also stated that they had no NPDES Permit for Industrial Activities and since there were no stormwater discharges from the site the facility terminated the submission of annual reports in the mid to late 1990s. There were no records of a stormwater program on site.

While on site, the inspectors observed a stormwater pond with an orange, oily sheen with debris scattered throughout the pond. They also observed a riser pipe in the pond which led them to believe the pond had a discharge point. They were told stormwater collected on site and was pumped to the pond. Mr. Bullock said there was no oil/water separator on site. Multiple materials (possibly hazardous) were observed adjacent to the stormwater collection area and the pond. The inspectors also observed pallets of batteries (lead/acid) stored adjacent to the collection area and also drums of lubricants, various exposed materials (possibly hazardous) were being stored throughout the site as well as outside of the facility fence line.

The summary report recommended that a multi-media investigation be conducted at the facility. A copy of the summary report is provided as an attachment to this report (See Attachment No. 2).

An anonymous complaint was received on April 17, 2013, which indicated that the salvage operation continued to burn all sorts of materials on cloudy days. The ash and smoke cause difficulty in breathing to anyone in the vicinity. Also, they were dumping/creating runoff into a pool of standing water on their property. The pool was visible from public property.

Following the February 2013 inspection, the EPA, Region III's, NPDES Enforcement Branch contacted EPA, Region III's Office of Enforcement, Compliance and Environmental Justice (OECEJ) stating they had some very great concerns based on what was observed during the February inspection and

recommended that a multi-media investigation be conducted at the facility. It was decided that a multi-media investigation would be conducted at the facility and investigation was assigned to Gerard Crutchley (lead inspector) and Justin Young in the Fort Meade office of OECEJ. The investigation was scheduled for May 28, 2013.

In preparation for the inspection, the lead inspector, Gerard Crutchley, drafted a field health and safety document (Field Trip Activities Sheet) and a Project Plan for the investigation. These documents are provided in Attachment No. 3. The EPA inspector also accessed a detailed facility report from EPAs OTIS database which indicated that the facility had notified as a Conditionally Exempt Small Quantity Generator of hazardous waste (See Attachment No. 4). Prior to the subject inspection, the EPA inspectors contacted the District Department of the Environment to notify them of the upcoming inspection. The EPA inspector received an e-mail from Steve Kelton, Chief, Office of Enforcement and Environmental Justice, DDOE which indicated that he notified the various DDOE program offices to inform them of the inspection. The EPA inspector was contacted by representatives from DDOE who stated that they would accompany EPA during the investigation. The subject facility was not notified prior to the inspection.

Inspection Observations

The EPA inspectors, Gerard Crutchley and Justin Young arrived at the facility on May 28, 2013 at approximately 0900 and announced the inspection to facility personnel. The EPA inspectors were joined shortly after by representatives from DDOE. The inspectors met with Mr. Robert Bullock, Chief Financial Officer for Super Salvage. The inspectors presented their credentials to Mr. Bullock identifying them as authorized representatives of the Agency. The inspectors then provided Mr. Bullock with a brief description of the purpose and scope of the subject inspection. The inspectors asked Mr. Bullock to provide a description of the facility and what activities took place at the site.

Mr. Bullock said that Super Salvage began operations in Washington in 1951 and moved their operations to the current site in 1954. At that time the facility was involved in recycling paper and rags. Mr. Bullock said that they gradually transitioned into recycling scrap metals. The facility currently accepts both ferrous and non-ferrous metals scrap for recycling. Mr. Bullock said the scrap metal comes from the general public, small businesses and government organizations. They operate from 7:00 am to 3:30 pm, Monday to Friday, and from 7:00 am to 12:00 pm on Saturdays. The facility is a little more than one acre in size. Mr. Bullock also said they provide dumpsters to customers for collecting scrap metal. There are two offices and a warehouse area all housed in one building. A roofed area, with concrete block walls and an open front, extends out from the office/warehouse building and houses a blast unit, a bailer, and storage for scrap metal. Mr. Bullock did say that the blast unit is no longer in operation. Also on site are two other buildings, one housing the hydraulic unit for a large metal shear and the other is the scale building for weighing incoming loads of scrap metal.

Mr. Bullock said that all scrap material is weighed as it enters the facility. The scrap metal is then separated according to type, ferrous and non-ferrous. The non-ferrous metals are further separated into specific types of metal, copper, brass, lead, aluminum, and stainless. All of these metals are placed onto the southern half of the facility closest to the main office and warehouse building and are either placed directly into cubic yard cardboard boxes or are compressed into bails and then shipped off site to secondary metal smelters. The ferrous metals, iron/steel are offloaded into large piles on the northern half of the facility. Mr. Bullock did say that they will accept metal tanks provided they have been cut in half. Mr. Bullock stated that they do not accept whole cars/vehicles or tires. They do accept

engine parts and metal car parts. Other materials accepted at the site include the following:

- intact lead/acid batteries – the batteries are collected, consolidated onto pallets and then shipped off site to a recycler (Intera, Baltimore, Maryland)

- air conditioning units with the refrigerants already removed

- electronic equipment (e.g. computers) – this equipment is collected and sent to Super Salvage's Prince Frederick, Maryland facility. Mr. Bullock said that they do not accept computer monitors or televisions

According to Mr. Bullock, the facility currently does not have permits related to any environmental media programs (e.g. hazardous waste, water). He did say that approximately 15 years ago they did file annual stormwater reports with the District, but since that time they have had no discharges of stormwater from the site and do not submit any reports. Mr. Bullock also said that they do not generate any hazardous waste. Mr. Bullock did say that they do generate used oil which is collected from equipment at the facility.

Following discussions with Mr. Bullock, the inspector began a tour of the subject facility accompanied by Mr. Bullock and Mr. Keller. Just outside of the facility's office, the inspectors observed a concrete bermed structure containing five 55 gallon drums, an open plastic pan, and three larger containers/tanks (See Photo Nos. 1 – 6). Mr. Bullock said that during a previous inspection by DDOE, the inspectors observed a metal plate over the contained area with drums on top of the plate and some runoff was observed from this area to an area outside of the facility's fence line. Mr. Bullock also said that most of the runoff consisted of mainly water with some oil. Mr. Bullock said the oil that is collected in the containers is removed from the site by an oil recycler (Mid States Oil). The EPA inspectors did observe the area just outside the facility's fence line adjacent to the oil storage area. The soil outside appeared to be stained (See Photo Nos. 7 – 9). The inspectors also noted that the concrete at one end of the containment area for the used oil containers was broken which could allow any spilled oil/water to runoff of the property (See Photo No. 10). The inspectors also noted a number of compressed gas cylinders stored in the same area as the used oil containment structure. Mr. Bullock said that the cylinders contained propane used for onsite fork lift trucks and also for torches used to cut metal scrap. The inspectors also observed a cylinder marked as containing compressed oxygen and one containing helium. The facility personnel did not know why the helium cylinder was at the facility.

The inspectors next observed the warehouse area in the main building. This area is used to store non-ferrous metals that have been segregated into separate boxes/containers (See Photo Nos. 15 – 18) and are awaiting shipment offsite. The area also houses a small maintenance area where the facility stores some usable materials (e.g. aerosol cans, See Photo No. 13) and also a part washing unit (See Photo No. 14). Mr. Bullock said the part washing unit has been out of service for about 1 ½ years and as far as he remembers it was last serviced by Safety Kleen about 5 to 7 years ago. The inspectors also observed an old air conditioning unit stored on a metal rack in the back of the warehouse area (See Photo No. 19). The inspectors asked Mr. Keller about the unit, but he said he did not know why it was in the warehouse.

Just outside of the office and warehouse building, the EPA inspectors observed the portion of the facility where the non-ferrous metals are stockpiled prior to processing (See Photo No. 11, 21 - 24). The inspectors also noted that a portion of this area is paved with concrete (See Photo No. 12). The

inspectors observed a small shear unit just outside of the building that is used to cut the ends off of radiators (See Photo No. 20). The inspectors also observed several cubic yard boxes containing insulated wiring (See Photo No. 25) and some old computers on a wooden pallet (See Photo No. 26).

The inspectors next observed the roofed area extending from the warehouse building. At one end of this area, adjacent to outside wall of the warehouse, the inspectors observed a large unit which was identified by Mr. Bullock as a blast unit which was used to remove paint from copper wire (See Photo Nos. 27 & 28). Mr. Bullock stated that this unit has not been in use for about 1 ½ years. He said that the removal of paint and other coatings from copper wire is now done at the company's Prince Frederick, Maryland facility using a different method. The inspectors noted that the area around the blasting unit, including the floor, was covered with what appeared to be dust from the blasting unit (See Photo No. 29). The inspectors also observed a device to collect used media from the blasting unit (See Photo No. 30). Under the collection device, the inspectors observed an open plastic trash can that was approximately ½ full of what appeared to be used media (See Photo No. 31). The inspector also observed an open plastic drum behind the blast unit that was also about ½ full of what appeared to be used media (See Photo No. 32). The facility personnel indicated that they have no plans for re-using the blasting unit. In the area adjacent to the blasting unit, the inspectors observed a number of cubic yard cardboard boxes containing various types of scrap metal. These boxes are staged in this area awaiting shipment offsite. At the other end of the roofed area from where the inspectors observed the blasting unit, the inspectors observed a large metal compactor/bailing unit (See Photo No. 34). This unit is used to compact and bail scrap aluminum sheet metal, stainless steel and radiator cores. Next to the compactor unit, the inspectors observed a metal cart containing seven one gallon cans and one quart can of paint/coatings (See Photo No. 35). When asked about the cans, John Keller said they were probably left at the facility by a customer. He said they might use some of the paint on site and also the facility employees might take some for their own use at home. The EPA inspectors told Mr. Keller that they should either use the materials on site or have them removed for disposal.

Adjacent to the roofed area where the compactor/bailer is located, the inspectors observed a large hydraulically operated metal shear unit and a concrete block building which houses the hydraulics for the shear unit (See Photo Nos. 36 – 41). The inspectors did observe that oil has leaked from the shear unit onto the surrounding areas around the unit (See Photo Nos. 39 – 41). While observing this area, the inspectors also noted a lead/acid battery next to the shear unit (See Photo No. 42) and two aerosol cans on a metal cabinet next to the shear unit (See Photo No. 43). When asked about the battery Mr. Keller said he did not know why the battery was stored next to the unit. The inspectors noted that of the two aerosol cans, one was labeled as brake parts cleaner and the label indicated it contained toluene and dichloromethane. The inspectors could not read the label on the second aerosol can. When asked what the facility does with empty aerosol cans, Mr. Keller said that they put them in a drum with used oil filters for disposal offsite.

The inspectors next moved past the large shredding unit around to the west side (back side of the building) of the open front building housing the compactor/bailing unit. At this location, the inspectors observed a large pond (See Photo Nos. 44 – 50) which was identified by Mr. Bullock as a stormwater collection pond. The EPA inspectors estimated the pond to be approximately 60 feet long and about 15 feet wide. The only access to the pond is from the north side, as the pond is bordered on the east side by the back wall of the open front building (See Photo Nos. 45 & 50), bordered on the west side by a chain link fence (See Photo Nos. 46 & 50), and bordered on the south end by a chain link fence and heavy vegetation. During the 2010 investigation conducted by DDOE and the February 2013 inspection conducted by EPA it was reported that a riser pipe was observed in the south end of the

pond. At the time of the subject inspection this pipe was difficult to see because of heavy vegetation in the area where the riser pipe is located. The EPA inspectors noted that water was covering approximately 2/3 of the pond at the time of the inspection. The EPA inspectors observed that the water in the pond and the exposed sediment had an oily sheen. When asked about the source of the water in the pond, Mr. Bullock said there is a depression located in about the center of the property and stormwater gravitates to the depressed area and is then pumped to the pond. The inspectors asked Mr. Bullock what happens to the water in the pond and he replied that basically, the water just evaporates. The inspectors also asked Mr. Bullock what happens to any oil that might be pumped to or flow into the pond. Mr. Bullock said that about two years ago a contractor was hired to skim some oil from the pond, but other than that one occasion, no oil has ever been removed from the pond. There was no documentation (e.g. manifest, bill of lading, etc) available at the time of the inspection to indicate when this occurred, and how much, and what type of material was removed from the site.

Adjacent to the north end of the pond, the inspectors observed some piles of scrap metal and other debris that appeared too had been at that location for a long time as some vegetation had grown over the material (See Photo No. 51). In these piles, the inspector observed some old aerosol cans (See Photo No. 52) and a circuit board (See Photo No. 53).

The inspectors next observed the area of the facility which contained the depression that Mr. Bullock described as the collection point for most of the stowmwater from the facility (See Photo Nos. 54 – 56). The depression is located just outside of the small block building that contains the hydraulics for the large shear unit at the facility. The inspectors observed that the depression appeared to contain some oil at the time of the inspection and they also observed the unit for pumping fluids to the stormwater pond. Mr. Bullock said that the depression has a concrete bottom. The inspectors observed that the line attached to the pump, through which the fluids from the depression are pumped to the pond, ran along the ground and into the small building housing the hydraulics for the large shear (See Photo No. 57). The line then ran along the floor of the building and through an opening on the other side (See Photo No. 58). The line continued along the ground to the northern edge of the pond behind the building.

Inside the small building housing the hydraulics, the EPA inspectors observed that the floor in the building was covered with oil (See Photo Nos. 58 & 59). The EPA inspectors also observed 5 plastic buckets (5 gallon in size) under the hydraulic fluid storage tank. At the time of the inspection the buckets were open and at least four of the buckets were almost full of oil (See Photo Nos. 60 & 61). Inside the building, the EPA inspectors also observed numerous aerosol cans of various products (See Photo Nos. 62 – 66). Some of the cans contained product and others were empty.

The inspectors next went up a stairway attached to the outside of the building housing the hydraulics onto the roof of the building. On the roof of the building, the EPA inspectors observed two lead/acid batteries (See Photo No. 67). The facility personnel did not know why the batteries were up on the roof. The inspectors also observed several containers (5 gallons or less in size) that were partially filled with what appeared to be oil (See Photo No. 68). One of the containers was partially filled with some other material that was not identified at the time of the inspection. The facility personnel did not know why these containers were on the roof of the building. From the roof of the building, the inspectors took photographs depicting an over view of the entire facility (See Photo Nos. 69 – 76).

Adjacent to the building housing the hydraulics, the EPA inspectors observed seven 55 gallon drums (See Photo No. 77). The drums were marked as containing gear lubricant. Mr. Bullock stated

that the contents of the drums are usable material. Just outside of the entrance door to the building housing the hydraulics, the inspectors observe a piece of electronic equipment with circuit boards (See Photo No. 78).

The inspectors next walked towards the scale building where incoming loads of scrap are weighed as they enter the facility. Along the way, the inspectors observed various materials stored in boxes and on pallets including engine parts (See Photo Nos. 79 & 80), lead/acid batteries stored on wooden pallets (See Photo Nos. 81 & 82), and some electronic equipment (See Photo No. 83).

At the scale building, the EPA inspectors observed a storage tank located behind the building (See Photo No. 84). The outside of the tank was marked with a flammable label and the UN # 1993 which designates a flammable liquid. The facility personnel indicated that the tank contained diesel fuel for facility equipment. Inside the scale building, the EPA inspectors observed an aerosol can which contained spray paint (See Photo No. 85). Just outside the doorway to the scale building, the EPA inspectors observed a plastic container with fluorescent light ballasts (See Photo No. 86). Although the labels on the light ballasts did not indicate the presence of PCBs, the facility does have a sign posted on the fence near the scale building which states that "because PCBs may be found in appliances and electrical equipment including fluorescent light ballasts, we require that these items be removed prior to delivery to our yard" (See Photo No. 87).

The EPA inspectors next toured the northern portion of the property where the facility processes the ferrous scrap metal. In this area, the EPA inspectors observed large piles of scrap metal and three large cranes that the facility uses for moving and segregating the scrap metal (See Photo Nos. 88 – 96). In this area, the EPA inspectors also observed two metal storage tanks (See Photo No. 97). One of the tanks was marked with a flammable label and the UN# 1993 and the other tank was marked as containing diesel fuel. There were three compressed gas cylinders next to the tanks, two of which were secured with a strap. The third cylinder was not secured and was leaning against one of the storage tanks. The EPA inspectors also observed a large metal storage container in the northern portion of the facility. Inside the storage container, the EPA inspectors observed a number of tires (See Photo No. 98). The facility personnel said that the tires are stored in the container and are used for facility equipment. The EPA inspectors also observed at least three window air conditioners in the storage container (See Photo Nos. 99 & 100) and one window air conditioner sitting outside of the storage container (See Photo No. 101). The facility personnel did not know why the air conditioning units were in this area.

The EPA inspectors next walked outside of the facility along the north property line. In this area the EPA inspectors observed fourteen large metal roll off containers. Mr. Bullock said that the roll offs belonged to Super Salvage. He said the adjoining property is owned by the District of Columbia, but he has permission to store his roll offs on this property. Of the fourteen roll offs, several contained trash and debris (See Photo Nos. 102 – 104). When asked about the trash and debris in the roll offs, Mr. Bullock said that it would be disposed of in a landfill. It appeared that at least one of the roll offs containing trash and debris was in poor condition and had been at that location for a long time (See Photo No. 104). The EPA inspectors also observed other debris, including tires, lying on the ground near the roll offs (See Photo Nos. 105 – 106). The inspectors also observed a portion of the property line between Super Salvage and the District's property where scrap metal and other debris had migrated onto the District's property (See Photo No. 107).

An aerial photograph depicting the facility and identifying the locations of specific areas of the

facility is attached to this report (See Attachment No. 5).

Following the tour of the subject facility, the EPA inspectors returned to the area containing the blast booth and utilizing an INNOV-X , portable x-ray fluorescence analyzer, model # α – 4000, serial no. 10555, screened the dust material that was observed on the floor around the unit and also in the two plastic containers next to the unit.

Following are the screening results:

XRF Reading No. 3 – 5/28/13 @ 1325, used media/dust in large open plastic trash can under dust collection unit for the blast booth (See Photo Nos. 108 & 109)

Chromium – 77,054 ppm
Lead – 713 ppm

XRF Reading No. 4 – 5/28/13 @ 1335, used media/dust in open plastic drum behind the blast booth (See Photo No. 110)

Chromium – 15,484 ppm
Lead – 742 ppm

XRF Reading No. 5 – 5/28/13 @ 1341, used media/dust on floor in front of blast booth, left side (See Photo No. 111 & 112)

Chromium - 39,977 ppm
Lead – 775 ppm

XRF Reading No. 7 – 5/28/13 @ 1403, used media/ dust on floor next to large open trash can under dust collection unit for the blast booth (See Photo No. 113)

Chromium – 59,196 ppm
Lead – 815 ppm

XRF Reading No. 8 – 5/28/13 @ 1406, used media/dust on floor under left rear of blast booth

Chromium – 39,372 ppm
Lead – 514 ppm

XRF Reading No. 9 – 5/28/13 @ 1409, used media/dust on floor under right rear of blast booth (See Photo No. 114)

Chromium – 36,413 ppm
Lead - 824 ppm

The EPA inspectors next moved to the area where the pond is located (See Photo No. 50) to collect samples of the sediment for screening.

Following are the screening results:

XRF Reading No. 13 – 5/28/13 @ 1540, sediment from pond on left side, marked with a surveyor's flag (See Photo No. 115)

Chromium – 436 ppm
Lead – 1474 ppm

XRF Reading No. 14 – 5/28/13 @ 1542, sediment from pond on right side, marked with a surveyor's flag (See Photo No. 116)

Chromium – 231 ppm
Lead – 1294 ppm
Mercury – 16 ppm

Following the screening of the aforementioned materials, the EPA inspectors returned to the facility office to ask Mr. Bullock some additional questions regarding activities which occur at the facility. The EPA inspectors did ask Mr. Bullock if the facility has in place permits for any environmental media programs (e.g. RCRA, CWA, CAA, etc). Mr. Bullock said they do not have any permits. As previously stated Mr. Bullock said they had a stormwater permit approximately ten years ago and at that time they filed stormwater reports with the District, but since there were no stormwater discharges from the site, the facility terminated the submission of annual reports in the mid to late 1990s. According to Mr. Bullock, all stormwater is contained on site and gravitates toward the depression area in the center of the facility and is then pumped over to the pond located behind the facility building. The inspectors asked Mr. Bullock what he knew about the riser pipe in the pond. Mr. Bullock said that as far as he knows, the riser pipe is connected to the District stormwater system; however, he also said that he has never seen any water from the pond flow into the riser pipe. The inspectors did ask Mr. Bullock if there were any floor drains in the buildings, and if so, where did they drain. Mr. Bullock said that they have no floor drains in the buildings.

The inspectors also questioned Mr. Bullock about the generation of any hazardous wastes at the site. Mr. Bullock said they do not generate any hazardous waste at the facility. The inspectors did observe a small cardboard box in the facility office which contained some used fluorescent light bulbs (See Photo No. 117). There was no indication from Mr. Bullock as to what they planned to do with the light bulbs. The EPA inspectors asked Mr. Bullock if they had ever removed any of the material from the containers or from the floor around the blast booth. Mr. Bullock stated that the blast both has been in place for about 6 to 7 years and they have never emptied the containers or cleaned up the area around the booth.

The inspectors next asked Mr. Bullock if they do any open burning at the site. Mr. Bullock said that the only burning which occurs on site is during the winter when they burn wood in open barrels to provide some heat to the employees working outside in the yard. The inspectors also asked Mr. Bullock if there was any asbestos on site. Mr. Bullock said that he believes there is some asbestos insulation in the facility buildings, but there are no plans to have it removed.

The inspectors asked Mr. Bullock if there were any underground tanks at the facility. Mr. Bullock stated there was one tank located at the facility, but it was removed back in the 1970s.

The inspectors asked Mr. Bullock about the storage of oil on site. Mr. Bullock said that they have two tanks for storing diesel fuel each with a capacity of 500 gallons, two tanks for storing used oil

each with a capacity of 350 gallons, approximately 12 to 15 drums each with a capacity of 55 gallons for storing oil, and two hydraulic units for storing hydraulic fluid, one at 600 gallons and the other at 350 gallons. Mr. Bullock said that they do not have an SPCC plan for the site. He did say that the two diesel fuel tanks are double walled tanks, but there is no other secondary containment in place for other storage containers at the site.

The inspectors asked Mr. Bullock if he was aware of any equipment on site which might contain PCBs or if they accept any PCB containing equipment. Mr. Bullock stated that they do not have any facility equipment containing PCBs and they do not accept any equipment containing PCBs.

The inspectors asked Mr. Bullock if they apply any pesticide products at the site. Mr. Bullock stated that they do not apply any pesticides at the facility.

The inspectors concluded the inspection for that day and then told Mr. Bullock that they would return to the facility on the following day to collect samples of the blast booth dust and the pond sediment & water for laboratory analysis.

5/29/2013

The EPA inspectors arrived at the facility on 5/29/13 at approximately 0830 and met with Mr. Bullock. The EPA inspectors were not accompanied by the DDOE representatives on the 2nd day of the inspection. The inspectors told Mr. Bullock that they were planning to collect samples of the blast booth dust and the samples from the pond. The inspectors asked Mr. Bullock if he wanted a split from any samples that the inspectors might collect. Mr. Bullock said he did not want any split samples. The inspectors first went to the roofed area extending from the warehouse building where the blast booth is located. The inspectors decided to collect three samples from this area, one from the open plastic trash can under the dust collection unit, one from the open plastic drum behind the blast booth and the third from the floor area adjacent to the dust collection unit. Because the material (used media/dust) to be collected had a baby powder like consistency and could easily become airborne, the inspectors wore tyvek suits, niton gloves and full face respirators to protect against any contact with the material during the actual sample collection. Specific information regarding each sample is as follows:

Sample No. SS1, 5/29/13, 0925, large trash can under dust collection unit – the EPA inspectors utilized a clean stainless steel grain sampler to collect the sample directly from the trash can. The sample was placed into a clean, 9 ounce amber glass container (See Photo No. 118).

Sample No. SS2, 5/29/13, 1012, open plastic drum behind blast booth – the EPA inspectors utilized a clean plastic scoop to collect the material from the barrel. The material was scooped to a depth of approximately 4 inches and then placed directly into a clean 9 ounce amber glass container (See Photo No. 119).

Sample No. SS3, 5/29/13, 0945, used media/dust on floor next to plastic trash can under dust collection unit. The EPA inspectors utilized a clean plastic scoop to scrap material from the floor which was placed into a clean stainless steel pan. The material in the pan was thoroughly mixed and then placed into two clean 9 ounce amber glass containers (duplicate sample). See Photo No. 120.

The EPA inspectors next moved to the area of the facility where the pond is located. When they arrived at this location, the inspectors noted that the exposed sediment area observed the previous day

was now completely covered with water and the water in the pond was covered with a heavy layer of oil (See Photo Nos. 121 – 123). The two areas in the pond where the inspectors had collected sediment for screening the day before were now covered with water. The inspectors could still see the small surveyor's flags they had placed at both of those locations on the previous day (See Photo Nos. 124 & 125). The only exposed sediment observed was at the very northern edge of the pond. The EPA inspectors did collect two sampled from this area, one was sediment from the exposed northern edge of the pond and the other was a water/oil sample from the left side of the pond. Specific information regarding each sample is as follows:
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Sample No. SS4, 5/29/13, 1115, sediment from the northern edge of the pond - the EPA inspectors utilized a clean plastic scoop to collect the sediment which was placed directly into two clean amber glass containers. One of the containers was designated for metals analysis and the other was designated for mercury analysis.

Sample No. SS5, 5/29/13, 1135, oily water from left side of pond – the inspectors utilized a clean, one liter glass container attached to an extension pole to collect a sample of the water/oil from the pond. The Inspectors collected enough sample to fill three clean one liter amber glass containers. The material sampled is depicted in Photo Nos. 126 & 127.

All of the samples collected from the facility were placed on ice and remained in the custody of the EPA inspectors. The samples were transported to the Region III laboratory located at Fort Meade for analysis. The sample containers were individually identified with sample tags and were signed over to the lab personnel on a chain of custody sheet.

The EPA inspectors requested the following analysis of the samples:

Sample Nos. SS1 – SS4, TCLP metals and mercury on Sample No. SS4

Sample No. SS5, DRO (Diesel Range Organics) & semi-volatile organics

A final analytical report was issued by the laboratory on July 31, 2013. A summary of the results is as follows:

Metals analysis (TCLP & Totals)

Sample Nos. SS1, SS2, & SS3 (samples of used media/dust from the blast booth area) were analyzed for the RCRA metals (TCLP analysis). None of the analysis yielded any results above the regulatory limit for the RCRA metals. Subsequent to the TCLP analysis, a total metals analysis was conducted on the three samples.

		RCRA Metals (TCLP results, mg/L)						
Sample No.	Sample Description	As	Ba	Cd	Cr	Pb	Se	Ag
SS1	Used media/dust in large trash can under dust collection unit	*U	0.831	0.080	U	U	U	U
SS2	Used Media/dust in open plastic drum behind blast booth	U	U	U	U	U	U	U
SS3	Used media/dust on floor next to large trash can under the dust	U	U	0.558	0.165	4.26	U	0.053

	collection unit							
		RCRA Metals (Total metals results, ug/g)						
Sample No.	Sample Description	As	Ba	Cd	Cr	Pb	Se	Ag
SS1	Used media/dust in large trash can under dust collection unit	*U	271	7.3	2040	1560	U	75.5
SS2	Used Media/dust in open plastic drum behind blast booth	U	285	10.4	417	3140	U	116
SS3	Used media/dust on floor next to large trash can under the dust collection unit	U	279	14.2	2190	1700	U	49.2

*U – analyte included in the analysis, but not detected at or above the quantitation limit.

Sample Nos. SS4(sample of sediment near north end of pond) was analyzed for the RCRA metals (TCLP analysis). The analysis did not yield any results above the regulatory limit for the RCRA metals. Subsequent to the TCLP analysis, a total metals analysis was conducted on the sediment sample.

		RCRA Metals (TCLP results, mg/L)							
Sample No.	Sample Description	As	Ba	Cd	Cr	Pb	Hg	Se	Ag
SS4	Sediment from northern edge of the pond	*U	U	U	U	1.01	U	U	U

		RCRA Metals (Total results, ug/g)							
Sample No.	Sample Description	As	Ba	Cd	Cr	Pb	Hg	Se	Ag
SS4	Sediment from northern edge of pond	*U	92.7	9.4	63.5	1120	2.8	U	U

*U – analyte included in the analysis, but not detected at or above the quantitation limit.

Diesel Range Organic Analysis

Sample No. SS5 (sample of water/oil from north end of pond) was analyzed for Diesel Range Organics and semi-volatile organics. Because the sample consisted of two distinct layers, an oily top layer and a bottom water layer, the two layers were separated and identified as two separate samples for purpose of analysis.

Diesel Range Organics are basically defined as mid-range petroleum products such as diesel fuel, home heating oil, gas oil, jet fuel, mineral spirits, and kerosene. The analysis for diesel range organics was performed as an on-demand analysis.

The analytical result of diesel range organics for the oily layer of the sample is 241,000 mg/kg. An attached qualifier to the result indicates that the identification of the analyte is acceptable, but the

reported value is an estimate.

The analytical result of diesel range organics for the water layer of the sample is 398,000 ug/L. An attached qualifier to the result indicates that the identification of the analyte is acceptable, but the reported value is an estimate.

Semi-volatile Organic Analysis

For the semi-volatile analysis of the two layers from the sample, the only indentified compound was Bis(2-ethylhexyl)phthalate.

The result in the oily layer is 12.1 mg/kg with an attached qualifier indicating the analyte is acceptable, but the value is an estimate.

The result in the water layer is 4340 ug/L.

A copy of the final analytical results as reported by the laboratory is provided as an attachment to this report (See Attachment No. 6).