



November 1, 2022

Mr. Paul Peronard
On-Scene Coordinator
U.S. Environmental Protection Agency, Region 8
1595 Wynkoop Street
Denver, Colorado 80202

**Subject: Draft Letter Report
Basin School Chemicals
Basin, Bighorn County, Wyoming
U.S. EPA Region 8 START V, Contract No. 68HE0820D0001
Technical Direction No. 2071-2210-06**

Dear Mr. Peronard:

The Tetra Tech, Inc. Superfund Technical Assessment and Response Team (START) is submitting this letter report for the Basin School Chemicals Site (the Site) located in Basin, Big Horn County, Wyoming. This report summarizes emergency response activities conducted at the Site. The overall scope of this technical direction (TD) was to provide technical support during emergency response activities.

PHYSICAL LOCATION AND CHARACTERISTICS

The Site is located at 911 B Street in Basin, Wyoming, and includes a building formerly used as a school.

SITE BACKGROUND INFORMATION

On Monday, October 17, 2022, the Basin (Wyoming) fire chief called the U.S. Environmental Protection Agency (EPA) Region 8 phone duty officer to report abandoned school chemicals found in a building recently acquired by the Town of Basin. The building was previously occupied by a school that has since moved out of the building. The chemicals were discovered in approximately 10 large boxes in the basement boiler room of the building. The chemicals appeared to be old, perhaps leaking, unlabeled, and not secured. Basin Fire Department has a hazmat team with limited resources and requested EPA assistance to help identify, secure and properly dispose of the chemicals.

OSC Paul Peronard deployed to the Site on October 18, 2022, along with START and the Emergency and Rapid Response Services (ERRS) contractor.

EMERGENCY RESPONSE ACTIVITIES

On October 18, 2022, OSC Peronard, START, and ERRS met at the Site and initiated assessment activities, including the segregation and inventorying of containers present at the Site. Air monitoring activities of the area indicated no readings above background concentrations on the MultiRAE Pro, Lumex mercury vapor analyzer, or Ludlum Model 19. Initial assessment of containers indicated the presence of hundreds of small containers, as well as several 15-gallon plastic drums containing corrosives (disinfectant); available label information indicated the presence of acids, bases, flammables, cyanides, sulfides, and other hazardous substances. Two transformers were also identified in the basement.

EPA, START and ERRS continued response activities from October 18 through 20, 2022. These activities are briefly summarized below:

- Inventoried containers at the Site, which included approximately 445 individual items.
- Segregated containers based on compatibility using available label information.
- Bulked and solidified paint-related materials using vermiculite to facilitate non-hazardous disposal at a nearby landfill.
- Performed hazard categorization testing to characterize unknown materials that were missing label information.
- Neutralized small drums and containers of acids using soda ash present in the basement.
- Bulked compatible chemicals together based on available label information and hazard categorization testing results; materials were mixed in four different batches and allowed to complete any reactions, before eventually being combined into one wastestream for disposal profiling.
 - One waste sample (BS-DISPOSAL-01) was collected from the wastestream and delivered for laboratory analysis of Toxicity Characteristic Leaching Procedure (TCLP) Metals; analytical results indicated the presence of chromium at a concentration of 19 milligrams per liter (mg/L), which exceeds the Resource Conservation and Recovery Act (RCRA) limit of 5 mg/L. No other analytes exceeded RCRA limits.
- Collected oil samples from each of two transformers identified in the basement; field test (Clor-N-Oil) results and are summarized below:
 - The smaller transformer (General Electric), which contained approximately 5 to 7 gallons of oil, indicated polychlorinated biphenyls (PCB), specifically Aroclor 1260, at concentrations greater than 50 parts per million (ppm). Subsequent laboratory analytical results (sample BS-T-02-SMALL) confirmed PCBs at a concentration of 83 ppm.
 - The bigger transformer (Westinghouse), which contained approximately 7 to 10 gallons of oil, indicated PCB concentrations were less than 20 ppm. Subsequent laboratory analytical results (sample BS-T-01-BIG) confirmed PCBs were not present above the method detection limits.

On October 21, 2022, EPA, START and ERRS demobilized from the Site.

Please contact me at 206.300.0301 or brian.croft@tetrattech.com if you have any questions regarding this report.

Sincerely,

Brian Croft
START V Technical Direction Manager