

**SITE ASSESSMENT REPORT
FOR
THE KEN'S METAL FINISHING SITE
MINNEAPOLIS, HENNEPIN COUNTY, MINNESOTA**

NPL STATUS: NON-NPL

Prepared for

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Emergency Response Branch
Region V
77 West Jackson Boulevard
Chicago, Illinois 60604-3507

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TABLE OF CONTENTS

Section	Page
1. INTRODUCTION.....	1
2. SITE BACKGROUND	1
2.1 SITE DESCRIPTION	1
2.2 SITE HISTORY	2
3. SITE ASSESSMENT ACTIVITIES	3
3.1 SITE RECONNAISSANCE	3
3.2 SITE OBSERVATIONS.....	4
3.3 SAMPLING ACTIVITIES	5
4. ANALYTICAL RESULTS.....	6
5. THREATS TO HUMAN HEALTH AND THE ENVIRONMENT	8
6. CONCLUSIONS AND RECOMMENDATIONS.....	11
6.1 CONCLUSIONS	11
6.2 RECOMMENDATIONS	12

LIST OF FIGURES

- 1-1 Site Location Map
- 2-1 Aerial Site Map
- 2-2a First Floor Layout
- 2-2b Basement Facility Layout
- 3-1a Plating Room Process Container Inventory
- 3-1b Black Oxide Room Process Container Inventory

LIST OF TABLES

- 3-1 Site Container Inventory
- 3-2 Sampling Location and Analysis Summary
- 4-1a Analytical Results for Characteristics of Hazardous Waste in Solid Samples
- 4-1b Analytical Results for TCLP Metals in Solid Samples
- 4-1c Analytical Results for TCLP SVOCs in Solid Samples
- 4-1d Analytical Results for Total SVOCs in Solid Samples
- 4-2a Analytical Results for Characteristics of Hazardous in Liquid Samples
- 4-2b Analytical Results for TCLP Metals in Liquid Samples
- 4-2c Analytical Results for Total SVOCs in Liquid Samples
- 4-2d Analytical Results for PCBs in Liquid Samples
- 4-3a Analytical Results for pH and TCLP Metals in the Oil Sample
- 4-3b Analytical Results for Total SVOCs in the Oil Sample

LIST OF APPENDICES

- A Photographic Documentation
- B Laboratory Analytical Report and Data Validation Report

LIST OF ABBREVIATIONS AND ACRONYMS

CEI	Compliance evaluation inspection
CFR	<i>Code of Federal Regulations</i>
mg/kg	Milligram per kilogram
mg/L	Milligram per liter
MPCA	Minnesota Pollution Control Agency
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
OSC	On-Scene Coordinator
PCB	Polychlorinated biphenyl
RCRA	Resource Conservation and Recovery Act
START	Superfund Technical Assessment and Response Team
SU	Standard unit
SVOC	Semivolatile organic compound
TCLP	Toxicity characteristic leaching procedure
TDD	Technical Direction Document
U.S. EPA	U.S. Environmental Protection Agency
VOC	Volatile organic compound
WESTON	Weston Solutions, Inc.

1. INTRODUCTION

The U.S. Environmental Protection Agency (U.S. EPA) tasked the Weston Solutions, Inc. (WESTON®), Superfund Technical Assessment and Response Team (START) to assist U.S. EPA On-Scene Coordinator (OSC) Anita Boseman in performing a site assessment at the Ken's Metal Finishing Site located in Minneapolis, Hennepin County, Minnesota (Figure 1-1). Under Technical Direction Document (TDD) number S05-0001-0803-008, U.S. EPA requested that WESTON START document current site conditions; perform air monitoring; collect waste samples; obtain photographic documentation; and evaluate the potential for imminent and substantial threats to human health, welfare, and the environment posed by Site conditions. On March 19 and 20, 2008, WESTON START conducted a site assessment under the direction of OSC Anita Boseman.

This Site Assessment Report is organized into the following sections:

- **Introduction** – Provides a brief description of the objective and scope of site assessment activities
- **Site Background** – Details the Site description and its known history
- **Site Assessment Activities** – Discusses the methods and procedures used during the site assessment
- **Analytical Results** – Discusses the analytical results for samples collected during the site assessment
- **Threats to Human Health and the Environment** – Identifies Site conditions that may warrant a removal action under the National Oil and Hazardous Substances Pollution Contingency Plan (NCP)
- **Conclusions and Recommendations** – Provides a summary of the site assessment findings and recommendations for further Site activities as needed

2. SITE BACKGROUND

2.1 SITE DESCRIPTION

The Site is located at 2333 Emerson Avenue North in Minneapolis, Hennepin County, Minnesota. The meridian coordinates for the site are 45° 0' 11" North and 93° 17' 39" West. The Site occupies about 0.34 acre and includes a brick building (the facility) and a gravel parking area in the rear (see

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Figure 2-1). The facility consists of a first floor and basement area with metal plating and polishing equipment. The first floor contains the polishing room, plating room, chemical storage room, black oxide room (chemical transfer area), and storage and office space (see Figure 2-2a). The basement contains the lathe room, a storage area, and a tool room that is separated from the other rooms by a partition (see Figure 2-2b). The basement has two separate entrances (into the tool room and storage area). The Site is located in a residential neighborhood with approximately 11 residential properties located within 200 feet of the Site. A childcare and crises center is located southeast of the site, and two schools and a park are located approximately 700 feet west of the Site. At least four churches and one park are located within 1,000 feet of the Site.

2.2 SITE HISTORY

The Site is a former metal electroplating and polishing facility, Ken's Metal Finishing, which began operation 1978 in northern Minneapolis. U.S. EPA involvement in the Site began in March 2005, when the City of Minneapolis, through the Minnesota Pollution Control Agency (MPCA), requested U.S. EPA assistance in responding to releases and threatened releases of plating shop chemicals and wastes at the Site. The Site operators failed a number of opportunities and demands to comply with county, state, and federal waste regulatory programs. The condition of on-site containers and the building reportedly made the neighborhood unsafe.

A Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) report completed on June 15, 2006, documents the on-site accumulation, improper storage, and management of solid and liquid industrial waste as well as the poor structural integrity of the facility building, including a damaged, leaking roof.

On March 14, 2008, Steve Kennedy of the City of Minneapolis, Chief Fruetel of the Minneapolis Fire Department, and a building inspector assessed the facility. On March 19, 2008, the Site owner gave property access consent for the site assessment.

3. SITE ASSESSMENT ACTIVITIES

On March 19 and 20, 2008, U.S. EPA OSC Anita Boseman, WESTON START members Jody Dillon, and WESTON's subcontractor, Bay West Inc., Dan Smith, and Barry Lindsay met with the property owner Kenneth LaCroix at the Site to conduct a site assessment. WESTON START evaluated potential threats to human health, human welfare, and the environment posed by current Site conditions. The site reconnaissance, site observations, and sampling activities are discussed below.

3.1 SITE RECONNAISSANCE

During the site assessment, WESTON START documented Site conditions; conducted an inventory of small containers, drums, and tanks/vats at the facility; and collected waste samples. WESTON START segregated the facility into the first floor and basement areas (see Figures 2-2a and b) to more easily document Site conditions. During the site reconnaissance, WESTON START performed written and photographic documentation of Site conditions (see Appendix A) and performed continuous breathing zone air monitoring using (1) a MultiRAE five-gas monitor for oxygen, carbon dioxide, hydrogen sulfide, volatile organic compound (VOC) vapors, and explosive gases; (2) a ToxicRae II hydrogen cyanide meter; and (3) a Micro-R gamma radiation meter. No air monitoring readings above background levels were recorded for the breathing zone throughout the facility during the site assessment.

During the assessment, Mr. LaCroix, described the containers' contents and use. The containers included drums, small containers, and tanks/vats on the first floor and basement areas. WESTON START inventoried each container, which included labeling the containers, documenting their condition, and documenting their approximate size or volume and contents. Each container of each type was documented in numerical order. WESTON START screened the container contents for pH and used a MultiRAE to screen container headspaces for carbon monoxide, VOCs, and hydrogen sulfide vapors; oxygen; and explosive gases. WESTON START also sketched a process flow diagram of the plating room and black oxide room to accurately inventory each container (see

Figures 3-1a and b). Over 121 containers (such as drums, small containers, tanks/vats) of metal processing materials and waste were inventoried, and the container contents were sampled to determine the quantity and type of wastes located at the Site. Additional containers were observed but not inventoried during the site assessment. Based on documentation and descriptions from the Site owner, WESTON START tagged containers for sampling.

3.2 SITE OBSERVATIONS

WESTON START personnel observed and documented approximately 121 small containers, drums, vats, and tanks containing various contaminants and chemicals throughout the facility. WESTON START observations during the site reconnaissance are summarized below.

- The property appeared abandoned for some time and was in various states of disrepair. The facility building contained five main areas of concern: the plating, polishing, chemical storage, black oxide, and basement storage rooms.
- In several areas, the building's ceilings had visible water damage and water was leaking inside. During the inspection, secondary containers were observed to be overflowing stormwater from snow melt.
- The building had a high fire hazard potential, containing at least three rectifiers, large electrical sources, and a leaking roof. The structure was heated by a free-standing gas heater mounted on the ceiling in the polishing room. During air monitoring activities using the five-gas meter, WESTON START detected elevated carbon monoxide levels in the area around the heater when the heater turned on.
- A container located on a high bowed shelf in the chemical storage room was labeled "Potassium Permanganate, strong oxidant, contact with acids, organic chemicals, or other combustible materials may cause fire or explosion." WESTON START observed that other containers of incompatible chemicals were stored near the container of potassium permanganate.
- The chemical storage room contained 32 drums, some stacked on top of each other, identified by Mr. LaCroix as containing nickel chloride or sulfate. Many other carelessly stored chemical containers were located throughout the building.
- Large open tanks/vats with various plating chemicals were located on the first floor. Many tanks appeared to be in poor condition, with spillage and leaks visible on the basement rafters.
- A flammable storage cabinet filled with aerosols, lacquers, and paint products was observed in the chemical storage room.
- Labels on the drums and containers throughout the facility included corrosive, toxic, poisonous, and flammable hazard class labels. However, most containers either were not

labeled or the label did not match the container contents. Therefore, most container contents were unknown.

- Many of the 55-gallon drums appeared dilapidated. At several locations throughout the Site, containers were severely rusted and leaking, and were not or could not be properly sealed.
- Several large plating process tanks were observed, and many contained large amounts of plating liquids with generic labeling and no hazardous class identification.
- The Site property was unfenced, and access to the building appeared unrestricted. In addition, work operations have ceased, making the Site vulnerable to trespassing and vandalism.

At the time of the site assessment, WESTON START observed and documented the following chemicals and materials labeled and stored on site:

- Acids (nitric, hydrochloric, chromic, sulfuric, and sodium hydrogen sulfate)
- Caustic soda, soda ash, and sodium hydroxide
- Unknown containers of sludge
- Oxidizers (potassium permanganate)
- Solutions and solids with cyanide
- Used oil
- Mineral spirits, paints, and lacquer

WESTON START documented the presence of approximately 121 on-site containers (55 drums, 34 small containers, and 32 tanks/vats) containing various chemicals. Additional containers were observed on site but were not inventoried during the assessment. Table 3-1 presents a detailed inventory of Site containers.

3.3 SAMPLING ACTIVITIES

On March 19, 2008, OSC Boseman requested that WESTON START collect solid and liquid waste samples for laboratory analysis. Sampling locations were selected based on field test results, such as screening results for pH and MultiRAE results for container headspaces for carbon monoxide, VOCs, and hydrogen sulfide vapors; oxygen; and explosive gases. Visual observations and Mr. LaCroix's knowledge of container contents were also considered. Sampling locations were chosen to be representative of areas posing a potential risk to human health and the environment based on

the presence of potentially corrosive or flammable chemicals.

WESTON START collected seven solid samples (including one duplicate) and one oil grab sample using dedicated, disposable plastic scoops. The samples were placed into laboratory-supplied glass jars. WESTON START collected seven liquid waste samples using dedicated drum thieves and placed the samples into laboratory-supplied bottles. OSC Boseman requested specific chemical analyses for each sampling location. Table 3-2 provides the sample collection summary (including sample identification number, matrix, sampling location, and analyses conducted for each sample).

All 15 samples collected were labeled, properly packaged, and placed on ice immediately after collection and accompanied by a completed chain-of-custody record during transport to Braun Intertec Laboratories, Inc., located in Minneapolis, Minnesota, for analysis.

4. ANALYTICAL RESULTS

START collected 15 samples (seven solid samples including a duplicate, seven liquid samples, and one oil sample) for waste characterization analysis to further determine if the Site poses imminent and substantial threats to human health, human welfare, and the environment from the presence of potentially hazardous materials at the Site. Tables 4-1a through d summarize the results for the solid samples, Tables 4-2a through d summarize the results for the liquid samples, and Tables 4-3a and b summarize the results for the oil sample. Appendix B provides the laboratory analytical data sheets and data validation reports for these samples.

Laboratory analysis of the seven solid samples (KMF-DM11, KMF-DM20, KMF-DM23 and duplicate, KMF-S1, KMF-S2, and KMF-SM24) yielded the results summarized below.

- Drum sample KMF-DM11 contained 370,000 milligrams per kilogram (mg/kg) of total cyanide and 14,000 mg/kg of reactive cyanide (see Table 4-1a).
- Samples KMF-DM23 and duplicate had pH values of 1.2 standard units (SU). Sample KMF-SM24 had a pH value of 0.0 SU (see Table 4-1a). These results exceed regulatory criteria stated in Title 40 of the *Code of Federal Regulations* (CFR), Part 261.20-24.

- Samples KMF-DM23 and duplicate contained toxicity characteristic leaching procedure (TCLP) chromium concentrations of 4,400 and 4,200 milligrams per liter (mg/L), respectively. Sample KMF-SM24 contained TCLP barium and TCLP chromium at concentrations of 940 and 25,000 mg/L, respectively (see Table 4-1b). These results exceed regulatory criteria stated in 40 CFR 261.24. Other TCLP metals analyses results for solid samples were below regulatory criteria.
- Sample KMF-SM24 was the only solid sample analyzed for TCLP semivolatile organic compounds (SVOC). Analytical results for sample KMF-SM24 did not exceed the regulatory criteria for TCLP SVOCs stated in 40 CFR 261.24 (see Table 4-1c).
- All seven samples contained low concentrations of total SVOCs (see Table 4-1d).

Laboratory analysis of the seven liquid samples (KMF-DM26, KMF-DM40, KMF-SM33, KMF-V1, KMF-V3, KMF-V27, and KMF-V32) yielded the results summarized below.

- Drum and tank/vat samples KMF-DM26 and KMF-V3 contained reactive cyanide concentrations of 3,100 and 160 mg/L, respectively (see Table 4-2a). Both samples also contained total cyanide concentrations of 73,000 and 6,000 mg/L, respectively.
- Samples KMF-DM40 and KMF-SM33 had pH values of 0 SU (see Table 4-2a). These results exceed regulatory criteria stated in 40 CFR 261.20-24.
- Samples KMF-DM26, KMF-DM40, KMF-SM33, and KMF-V27 all contained TCLP metals at concentrations that exceed regulatory criteria stated in 40 CFR 261.24. TCLP metals concentrations in these samples were as high as 56 mg/L for arsenic, 33 mg/L for cadmium, 11,000 mg/L for chromium, 130 mg/L for lead, and 3.1 mg/L for selenium (see Table 4-2b).
- Total SVOCs were not detected in the liquid samples (see Table 4-2c).
- Polychlorinated biphenyls (PCB) were not detected in sample KMF-V32 (see Table 4-2d).

Small container sample KMF-SM32 was the only oil sample collected. The sample was analyzed for pH, TCLP metals, and SVOCs. No TCLP metals results exceeded regulatory levels, and no SVOCs were detected (see Tables 4-3a and b). The pH result of 4.2 SU did not exceed regulatory criteria stated in 40 CFR 261.20-24.

5. THREATS TO HUMAN HEALTH AND THE ENVIRONMENT

Potential receptors of releases from the Site include numerous residential properties and two schools near the Site. Factors to be considered in determining the appropriateness of a potential removal action at a Site are delineated in the NCP at 40 CFR 300.415(b)(2). A summary of the factors applicable to this Site is presented below.

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

Corrosive materials were identified on site and characterized as hazardous waste for corrosivity as defined in 40 CFR 261.22. Corrosive acids have pH values less than 2 SU. Analytical results indicate that four container samples had pH values less than 2.0 SU (KMF-DM23, KMF-SM24, KMF-DM40, and DMF-SM33).

Analytical results also identified material exhibiting toxic characteristics. According to 40 CFR 261.24, a solid waste (except manufactured gas plant waste) exhibits the characteristic of toxicity if, using the TCLP Test Method 1311 in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods" (EPA Publication SW-846), the extract from a representative sample of the waste contains any of the contaminants listed in Table 1, Maximum Concentration of Contaminants for the Toxicity Characteristic, at a concentration equal to or exceeding the respective value in that table. Concentrations of TCLP metals in six samples (KMF-DM23, KMF-DM26, KMF-DM40, KMF-SM33, KMF-V27, and KMF-SM24) exceeded regulatory criteria, including chromium, lead, arsenic, barium, cadmium and selenium results. TCLP chromium was detected at a concentration as high as 25,000 mg/L.

The potential for an accidental or intentional release of hazardous materials or pollutants and/or a reaction generating toxic gases is present on site. Numerous containers of potential hazardous waste, hazardous chemicals, and unknown waste are present at the Site. Sampling results from this site assessment identified potentially reactive cyanide-containing materials.

Pursuant to 40 CFR 261.23 (a)(5), these materials are considered hazardous based on the

RCRA characteristic of reactivity, which states that “a solid waste exhibits the characteristic of reactivity if a representative sample . . . is a cyanide or sulfide bearing waste which, when exposed to pH conditions between 2 and 12.5, can generate toxic gases, vapors, or fumes in a quantity sufficient to present a danger to human health or the environment.” Three samples or containers exhibited characteristics of potentially reactive substances. Drum solid sample KMF-DM11 contained 14,000 mg/kg of reactive cyanide. Drum and tank/vat liquid samples KMF-DM26 and KMF-V3 contained reactive cyanide at concentrations of 3,100 and 160 mg/L, respectively.

The on-site containers were in poor condition, and some but not all have fair secondary containment. The Site, which has relatively unrestricted access, is located in a residential neighborhood. Two schools are directly west of the Site, indicating potential exposure to hazardous substances in the event of a fire, release, or trespassing. The unknown and hazardous nature of many of the container contents poses a potential exposure hazard to trespassers and first responders.

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

Analytical results for samples collected from the drums, small containers, and tanks/vats confirm the presence of potentially hazardous materials and toxic contaminants. As described above, on-site materials are corrosive, potentially reactive, and contain high levels of cyanide and TCLP metals at concentrations that exceed the toxicity characteristics. A total of approximately 121 containers are present at the Site, including hazardous wastes containers, in varying stages of decay and without proper secondary containment. Currently, the polishing room, plating room, and black oxide room contain containers that appear to be leaking or that have had spilled contents.

A release of these materials from the Site is possible because of the potential for trespassing, fire, and impact from stormwater. WESTON START observed many containers in on-site open areas where access is relatively unrestricted. Trespassers could move onto the Site and cause a direct release of contaminants or a fire and subsequent dispersion of airborne contamination or contamination through fire-suppression runoff. Likewise, stormwater that

enters the building through the compromised roof structure could cause contaminants to migrate to exposed basement soil or off site through overland flow. A childcare and crisis center is located southeast of the Site, and two schools and a park are located approximately 700 feet west of the Site. Residential properties are also located nearby. These public areas could be exposed to potentially hazardous materials if contaminants migrate off site.

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

Minneapolis receives an average yearly rainfall of 27 inches and an average yearly snowfall of 49 inches, with temperatures that range from more than 85 °F to less than 0 °F. The weight of snowfall and the freeze/thaw cycle could result in further deterioration of Site structures, especially the damaged, leaking building roof and waste containers, making conditions at the Site more dangerous.

Based on the compromised condition of the building roof structure and potentially hazardous wastes and chemicals stored in dilapidated or open containers in non-enclosed areas, overflow of the containers with stormwater during precipitation events could result in contaminant releases. Containers throughout the polishing room, plating room, and black oxide room appear to be leaking, have little or no secondary containment, or have failed secondary containment. A release from these containers is likely during future precipitation events because structural deterioration continues.

▪ **Threat of fire or explosion**

The building had a high fire hazard potential, containing at least three rectifiers, large electrical sources, and a leaking roof. In addition, numerous containers of potential hazardous waste, hazardous chemicals, and unknown waste have been identified at the unrestricted Site. At the time of the site assessment, the building electricity was connected, and WESTON START observed rain water leaking through the damaged roof over light fixtures. Additional water damage resulting from the compromised and deteriorating roof structure or vandalism would increase the likelihood of an electrical fire (intentional or unintentional).

Fires at the Site could result in an airborne release of hazardous chemicals or a release of chemicals in fire suppression runoff water could endanger first responders, nearby populations, and users of the nearby schools and park. Evacuations may be necessary in the event of a fire or release at the Site.

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

MPCA has requested assistance from U.S. EPA to address waste that is improperly stored at the Site.

6. CONCLUSIONS AND RECOMMENDATIONS

6.1 CONCLUSIONS

During the site assessment, over 121 storage containers were identified throughout the Site, many of which were labeled as corrosive. Most of the containers have unknown contents. Additional containers were observed during the assessment but were not inventoried. Fifteen container samples were collected and analyzed for various parameters, including TCLP metals, cyanide, pH, and reactivity. Results indicated that six samples contained concentrations of TCLP metals that exceeded the criteria for characteristic hazardous waste; four samples were corrosive; and three samples contained potentially reactive cyanides and high concentrations of total cyanide. WESTON START personnel determined that wastes were present on Site in dilapidated small containers, drums, and tanks/vats that pose a threat of release and an imminent and substantial threat to human health, human welfare, and the environment. Hazards identified at the Site include the following uncontrolled factors:

- Wastes exhibiting characteristics of potentially reactive, corrosive, and toxic materials
- Contaminants in open, decrepit, and leaking containers
- Unrestricted Site access
- Questionable integrity of building structures, including a dilapidated, leaking roof
- Close proximity to residential properties and public areas (a park and two schools)

- Potential migration pathways from the waste inside the building to public areas

Contaminants and conditions at the Site meet criteria established in the NCP for a removal action by U.S. EPA. The removal action could be performed to mitigate imminent and substantial endangerment posed to human health, human welfare, and the environment by Site conditions.

6.2 RECOMMENDATIONS

Based on the information gathered during the site assessment, WESTON START recommendations are summarized below.

- Before further response activities are conducted, Site access should be restricted to limit the potential for releases, fires, and endangerment.
- Current plating operations at the Site have been discontinued, but threats resulting from the Site should be fully characterized and mitigated. The structural integrity of the building and electrical hazards should be evaluated.
- All uncontrolled wastes should be removed from the Site to reduce the potential for a release of hazardous materials that could result in, but not be limited to, any or all of the following:
 - Potential exposure of human populations to Site contaminants
 - Potential for fire at the Site that could result in releases of hazardous contaminants and vapors
- An emergency removal action may be needed to address Site hazards and to mitigate the imminent and substantial endangerment posed to human health, human welfare, and the environment by Site conditions.

FIGURES

TABLES

APPENDIX A
PHOTOGRAPHIC DOCUMENTATION

APPENDIX B
LABORATORY ANALYTICAL REPORT
AND DATA VALIDATION REPORT