UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
ENVIRONMENTAL SERVICES DIVISION
REGION 7
25 FUNSTON ROAD
KANSAS CITY, KANSAS 66115

NOV 28 1994

MEMORANDUM

SUBJECT: Transmittal of Inspection Report - RCRA

FROM: Joe Arello
Chief, Compliance Assurance Section, EMCM/ENSV

TO: Lynn Slugantz
Acting Chief, IRMS/PSBR/WSTM

This memorandum transmits the following compliance sampling inspection report performed by the Compliance Assurance Section, Environmental Monitoring and Compliance Branch, Environmental Services Division.

Facility	EPA ID Number	Activity No.	Potential Areas of Non-Compliance
SMV Industries Council Bluffs, IA	IAD984566034	ANF74	Waste Determination

RECEIVED
NOV 30 1994
CMEL
IOWA SECTION

Attachments

REPORT OF RCRA CLOSURE SAMPLING INSPECTION

AT

SMV INDUSTRIES
1103 S. 6th Street
(P.O. Box 1094)
Council Bluffs, Iowa 51502

EPA ID Number: IAD984566034

ON

October 31, 1994

BY

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region VII
Environmental Services Division

INTRODUCTION

At the request of the Waste Management Division (WSTM), a RCRA closure sampling inspection was performed at SMV Industries, Council Bluffs, Iowa on October 31, 1994. The inspection was conducted under the Resource Conservation and Recovery Act (RCRA), as amended. This report and attachments present the results of the inspection.

PARTICIPANTS

SMV Industries (SMV):
Carroll Shaffer, Supervisor

HWS Consulting Group, Inc. 825 "J" Street
Lincoln, Nebraska 68508
Rick Welchoff, Project Representative

U.S. Environmental Protection Agency (EPA):
Dedriel L. Newsome, Environmental Engineer
Clint Sperry, Environmental Scientist

INSPECTION PROCEDURES

Upon arrival at the 1103 S. 6th Street facility no one was present due to the facility being closed. Therefore, I went to 1026 S. 6th Street (SMV's new address) and met Mr. Shaffer. I explained the purpose and procedures of the inspection and presented him with my EPA credentials. Mr. Shaffer was present during most of the sampling activities, except for approximately 30 minutes for lunch. During the inspection, discussions consisted of some facility operations/management activities that took place near the storage area at the facility. At the

conclusion of the inspection, the findings and recommendations were summarized with Mr. Shaffer. Mr. Shaffer was provided with a Confidentiality Notice, a Request for Confidential Treatment form and a Document of Receipt which he signed as acknowledgement of receipt, see attachments 1 through 3.

FACILITY DESCRIPTION

According to the sampling plan, SMV manufactures and distributes various products and tools including tie-down loops, chain binders, cultivator shields, electric fence posts, rake teeth, screw jacks, hammers, etc. Paint waste was generated from painting fence posts and metal cleaning waste was generated from cleaning metal parts and components. Two to three drums of waste paint/corrosive cleaner were stored over 270 days in a gravel covered area outside of the SMV plant. Therefore, SMV operated a storage facility and was directed to close the storage area in accordance with 40 CFR 265. More information on the facility's past operations may be obtained from the closure plan and the facility files, see attachment 4 for the Closure Plan.

FINDINGS AND OBSERVATIONS

A. Site Observations

The closure activities were being completed by HWS Consulting Group. The storage area was located on the south side of the facility, see photos 1 and 2 and attachment 5. The storage area was covered with leaves and is currently being used to store various equipment and materials as shown in the photos. None of the equipment/ materials had to be moved in order for the samples to be collected, except for the stack of pallets shown in photo 2.

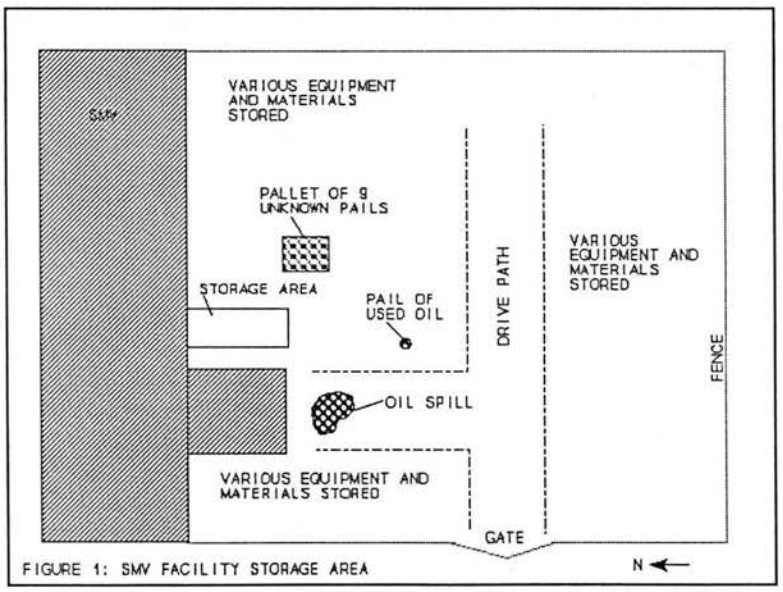

FIGURE 1: SMV FACILITY STORAGE AREA

There were nine 5-gallon pails about six feet east of sampling point #001, see Figure 1 (attachment 5-2) and photos 3 through 5. I asked Mr. Welchoff to use the Hnu meter, which contained a 10.2eV probe, to get a reading as Mr. Sperry detected a solvent order. Mr. Welchoff conducted the monitoring and determined that

two of the pails had a 9 unit measurement out of a possible 10, see photo 4. I asked Mr. Shaffer what the pails consisted of and how long they had been there. He was not sure what they were and stated that they had been there as long as he has. I asked him how long he had been there and he stated about two years.

There was also a 5-gallon container of waste oil (according to Mr. Shaffer) located south of the storage area, see Figure 1 and photos 6 and 7. Mr. Shaffer stated that they overhauled a tractor in the area. This resulted in the oil spill shown in Figure 1 and photo 8 according to Mr. Shaffer.

B. Sampling Procedures

The original HWS Consulting Group sampler, Sean Brown, did not conduct the sampling as he was sick. Therefore, Mr. Welchoff completed the sampling activities. The following activities took place:

1. Locate the Storage Area

Mr. Welchoff attempted to located the storage area based on the description in the sampling plan. However, the plan was not exactly clear on the specific location, therefore Mr. Welchoff contacted Mr. Brown by phone to determine the location. The location is shown in Figure 2 (attachment 5-3) and photos 1 and 2.

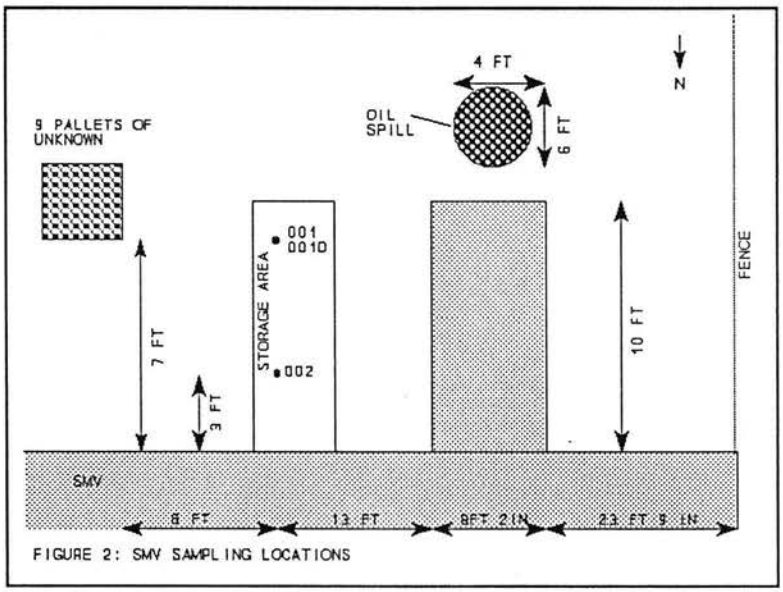

FIGURE 2: SMV SAMPLING LOCATIONS

2. Locate the First Sampling Point

The first sampling point was located in a low spot as stated in the plan and shown in Figure 2 and photos 9 and 10.

3. Auger Down to Collect First Sample

Mr. Welchoff removed the top layer of leaves and lose gravel from the area with his hands. He then augered down using a one foot stainless steel auger pass the gravel. The gravel depth ranged from about three to eight inches in the storage area. He then augered down once and filled two of his vials and Mr. Sperry filled one labeled vial for EPA. Mr. Welchoff augered down again

and three EPA vials were filled, two of which were for a duplicate sample. Mr. Welchoff packed the soil into the VOAs using a blunt rod that was covered with a protective glove. Mr. Sperry packed the soil into the labeled VOAs using a stainless steel spoon.

Mr. Welchoff then filled an aluminum pan with more soil (including what was remaining from the filling the last above VOAs) from the sample hole. In order to collect enough sample, he had to removed the gravel from around the hole with his hands as the auger was only one foot long. Mr. Sperry then mixed this soil with a stainless steel spoon and split it to collect the contractor's sample and EPA's sample #001 and its duplicate for metal analysis. The container used by Mr. Welchoff consisted of a 150 mL amber glass jar and EPA's containers consisted of labeled 8oz. glass jars.

The Hnu meter was used during this sampling process and a trace was detected when the meter was put into first sample's hole after the second auger was collected. Mr. Welchoff attributed this to be moisture. The soil removed from the hole was slightly moist and dark brown. The first set of samples were collected between 9 and 15 inches (measured with a tape measure after sample was collected). The first sample was noted as South by the contractor and #001 and #001D (duplicate) by EPA.

Gloves were worn by the contractor and by Mr. Sperry to collect samples.

4. Clean Auger

The auger was cleaned with alconox soap and DI water. It was then air dried.

5. Collect the Second Sample

The second sample point was located in a low spot and was collected in the same manner as discussed above, see Figure 2 and photo 11. This sample was collected between 8 and 12 inches. No detections were measured on the Hnu meter during the collection of the second sample. The second sample was noted as North by the contractor and #002 by EPA.

6. Sample Containers / Sampling Plan Deviation

After each sample was collected, Mr. Welchoff put the VOAs in a plastic ziploc type bag and the bags were labeled with waterproof ink as South and North respectively. He also labeled the tops of the jars with the North and South designation and date. The samples were placed in a cooler for preservation.

The labeling described above was a deviation from the plan prepared by HWS Consulting Group as it states that the containers would be labeled immediately after collecting with gummed paper labels with the information shown in attachment 4. Mr. Welchoff stated that he does not label the VOAs individually in the field due to the solvents present which may cause the ink to come off or due to the solvents present in the ink interfering with the sample. He stated that when he gives the samples to the lab, the lab will put the individual labels on.

7. Recording Sampling Information

Mr. Welchoff recorded the required information in his bound field note book after the sampling was completed.

8. The contractor's samples were transported to the Analytical Service Division of HWS Consulting Group, Lincoln, NE.

c. EPA Samples

A sampling plan was prepared by the permit writer, Harriet Jones, see attachment 6. As the permit writer requested splits, the samples were collected (augered) by HWS Consulting Group as discussed above. The field sheets of the above samples are shown in attachment 7-2 through 7-5. After the samples were collected, they were packaged as stated in EPA's plan (attachment 6). The samples were transported to the EPA Laboratory for analyses on 11/1/94, see attachment 7-6 for the Chain-of Custody form.

The results of the analyses are shown in attachment 8. Please note that the volatile samples were not actual splits, but adjacent samples as they were not mixed due to the possibility of the volatiles escaping. Also 001 and 001D for the volatiles were not actual duplicates for the same reason.

Dedriel Newsome

Dedriel L. Newsome
Environmental Engineer
Date: 11/22/94
Activity No.: ANF74

Joe Arello

Joe Arello
Chief, Compliance Assurance Section
Date: 11/23/94

Attachments

1. Confidentiality Notice (2 pages)
2. Request For Confidential Treatment
3. Document of Receipt
4. Closure Plan (39 pages)
5. Facility Layouts (3 pages)
6. EPA's Sampling Plan (11 pages)
7. Field Sheets / Chain-of-Custody Form (6 pages)
8. Analytical Results (4 pages)

Photo Log (2 pages)
Photographs (4 pages / 11 photos)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
CONFIDENTIALITY NOTICE

Facility Name	
SMV Industries	
Facility Address	
Council Bluffs, IA	
Inspector (print)	Title
Dedriel Newsome	Env. Engineer
U.S.EPA, Region VII, ENSV Division, 25 Funston Road, Kansas City, KS 66115	Date 10/31/94

It is possible that the United States Environmental Protection Agency (EPA) will receive public requests for release of the information obtained during inspection of the facility above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 U.S.C. 552; EPA regulations issued thereunder, 40 CFR Part 2; and the applicable statute under which the information is obtained. EPA is required to make inspection data available in response to FOIA requests, unless the Agency determines that the data contains information entitled to confidential treatment.

Any or all of the information collected by EPA during the inspection may be claimed confidential, if it relates to trade secrets or commercial or financial matters that you consider to be confidential. If you make claims of confidentiality, EPA will disclose the information only to the extent, and by the means of the procedures set forth in the regulations (cited above) governing EPA's treatment of confidential information.

To claim information confidential, you must certify that each claimed item meets <u>all</u> of the following criteria (40 CFR 2.208):

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.

2. The information is not, and has not been, reasonably obtained without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on showing special need in a judicial or quasi-judicial proceeding).

3. The information is not publicly available elsewhere.

4. Disclosure of the information would cause substantial harm to your company's competitive position.

<u>In addition</u>, within fifteen (15) calendar days of the claim, you must provide written comments in support of the claim, based on factors listed in 40 CFR 2.204(e)(4). This statement should be mailed by registered, return-receipt requested mail to the Inspector at the address listed above. Failure to submit comments by this deadline will be deemed a waiver of the claim pursuant to 40 CFR 2.205(d)(1).

At the completion of the inspection, you will be given a receipt for all materials collected. At that time you may make claims that some or all of the information is confidential and meets the criteria listed above.

Facility Name
SMV Industries
Facility Address
Council Bluffs, IA

If you are **not** authorized by your company and there is no one on the premises of the facility who is authorized to make confidentiality claims, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials, to the authorized representative designated below.

Authorized Representative _____

Title _____

Address _____

_____

If the authorized representative listed above requests confidential treatment, they must return a statement specifying any information which should receive confidential treatment and written comments in support of the claim based on factors listed in 40 CFR 2.204(e)(4).

This statement from the authorized representative should be mailed by registered, return-receipt requested mail within fifteen (15) calendar days of receipt of the Confidentiality Notice to the Inspector at the address listed on page 1.

Failure to submit confidentiality claims and comments within the fifteen (15) day period will be deemed a waiver of the claim pursuant to 40 CFR 2.205(d)(1).

==========

To be completed by the facility official receiving this Notice:

I have received and read this Notice.

Facility Representative Provided Notice (print)	Title
Supervisor	
Signature/Date	
Carroll Shaffer 10-31-94	

(rev:1/20/93)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REQUEST FOR CONFIDENTIAL TREATMENT

Facility Name
SMV Industries
Facility Address
Council Bluffs, IA

Information for which confidential treatment is requested:

Acknowledgement of Claimant

The undersigned requests that confidential treatment of the information described be provided in accordance with provisions of the Freedom of Information Act (FOIA), 5 U.S.C. 552; EPA regulations issued thereunder, 40 CFR Part 2; and the applicable statute under which the information is obtained. The undersigned further acknowledges that they are authorized to make such claims for their firm.

The undersigned also certifies that each claimed item described above meets all of the following criteria (40 CFR 2.208):

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.
2. The information is not, and has not been, reasonably obtained without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on showing of special need in a judicial or quasi-judicial proceeding).
3. The information is not publicly available elsewhere.
4. Disclosure of the information would cause substantial harm to your company's competitive position.

In addition, within 15 days of your claim, you must provide written comments in support of the claim, based on factors listed in 40 CFR 2.204(e)(4). Failure to submit comments by this deadline will be deemed a waiver of the claim pursuant to 40 CFR 2.205(d)(1).

Authorized Representative (print)	Signature/Date
Carroll Shaffer	Carroll Shaffer 10-31-94
No confidential treatment claimed during the inspection: CS (Facility Representative's initials)	
Inspector (print)	Signature/Date
Daniel Newsome	Daniel Newsome 10/31/94
U.S.EPA, Region VII, ENSV Division, 25 Funston Road, Kansas City, KS 66115	

(rev:1/20/93)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RECEIPT FOR DOCUMENTS AND SAMPLES

Facility Name: SMV Industries
Facility Address: Council Bluffs, IA

Documents Collected? YES___ (list below) NO___

Samples Collected? YES✓ (list below) NO___ Split Samples: YES___ NO✓

Documents/Samples were: 1)Received no charge✓ 2)Borrowed___ 3)Purchased___

Amount Paid: $_____ Method: Cash___ Voucher___ To Be Billed___

The documents and samples described below were collected in connection with the administration and enforcement of the applicable statute under which the information is obtained.

==========

Receipt for the document(s) and/or sample(s) described below is hereby acknowledged:

Sampled Drum Storage area
2 samples
#001 South
001D South
002 North

Facility Representative (print)	Signature/Date	
Carroll Shaffer	Carroll Shaffer	10-31-94
Inspector (print)	**Signature/Date**	
Dedriel Newsome	Dedriel Newsome	10/31/94

U.S.EPA, Region VII, ENSV Division, 25 Funston Road, Kansas City, KS 66115

(rev:1/20/93)

SMV Industries Council Bluffs, IA
10/31/94 PHOTO 1

Past storage area next to tree where stack of pallets located.

D. Newsome

SMV Industries Council Bluffs, IA
10/31/94 PHOTO 2

Past storage area next to tree where stack of pallets located. (Close-up of photo 1)

D. Newsome

SMV Industries Council Bluffs, IA
10/31/94 PHOTO 3

9 pails of unknown about 6ft to east of sample point 001.

D. Newsome

SMV Industries Council Bluffs, IA
10/31/94 PHOTO 4

9 pails of unknown about 6ft to east of sample point 001. The two pails pointed out by the red arrows measured 9 units on the Hnu meter (10.2eV probe). All others measured no detection
D. Newsome

SMV Industries Council Bluffs, IA
10/31/94 PHOTO 5

9 pails of unknown about 6ft to east of sample point 001. (A couple of the pails shown with the lid off.)

D. Newsome

SMV Industries Council Bluffs, IA
10/31/94 PHOTO 6

Pails of used oil generated from tractor overhauling.

D. Newsome

SMV Industries Council Bluffs, IA
10/31/94 PHOTO 7

Pails of used oil generated from tractor overhauling. (Close-up of photo 6)

D. Newsome DN

SMV Industries Council Bluffs, IA
10/31/94 PHOTO 8

Oil spill from tractor overhauling in shadow of HWS's van in front of shed.

D. Newsome

SMV Industries Council Bluffs, IA
10/31/94 PHOTO 9

Area of sample point 001 and 001D
prior to leaves and gravel removed.

D. Newsome

SMV Industries Council Bluffs, IA
10/31/94 PHOTO 10

Area of sample point 001 and 001D
after sample was collected.

D. Newsome

SMV Industries Council Bluffs, IA
10/31/94 PHOTO 11

Area of sample point 002 after sample was collected.

D. Newsome

NOV 28 1994

MEMORANDUM

SUBJECT: Transmittal of Inspection Report - RCRA

FROM: Joe Arello
Chief, Compliance Assurance Section, EMCM/ENSV

TO: Lynn Slugantz
Acting Chief, IRMS/PSBR/WSTM

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Facility	EPA ID Number	Activity No.	Potential Areas of Non-Compliance
SMV Industries Council Bluffs, IA	IAD984566034	ANF74	Waste Determination

Attachments

DNewsome: dn 11/22/94

EMCM	EMCM	EMCM
AGN 11/22/94	11/22/94	Just for Art 11/23/94

REPORT OF RCRA CLOSURE SAMPLING INSPECTION

AT

SMV INDUSTRIES
1103 S. 6th Street
(P.O. Box 1094)
Council Bluffs, Iowa 51502

EPA ID Number: IAD984566034

ON

October 31, 1994

BY

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region VII
Environmental Services Division

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SMV Industries (SMV):
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HWS Consulting Group, Inc. 825 "J" Street
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FINDINGS AND OBSERVATIONS

A. Site Observations

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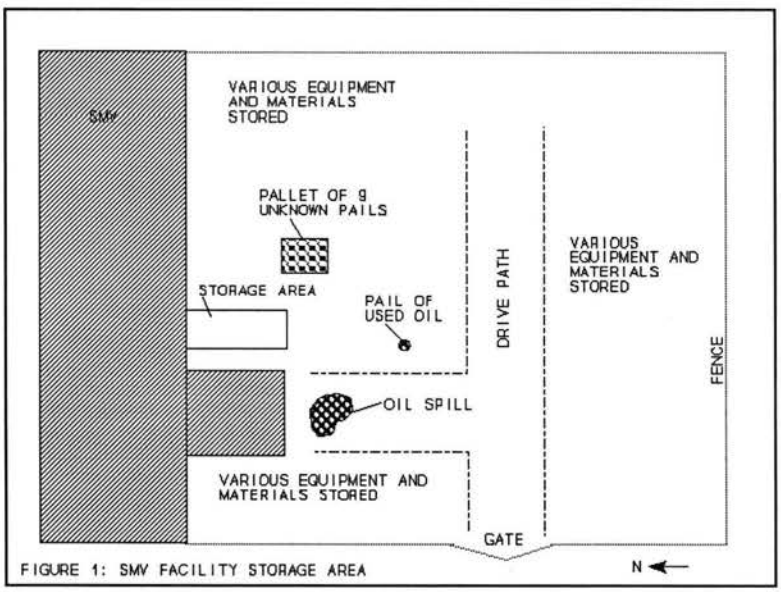

FIGURE 1: SMV FACILITY STORAGE AREA

There were nine 5-gallon pails about six feet east of sampling point #001, see Figure 1 (attachment 5-2) and photos 3 through 5. I asked Mr. Welchoff to use the Hnu meter, which contained a 10.2eV probe, to get a reading as Mr. Sperry detected a solvent order. Mr. Welchoff conducted the monitoring and determined that

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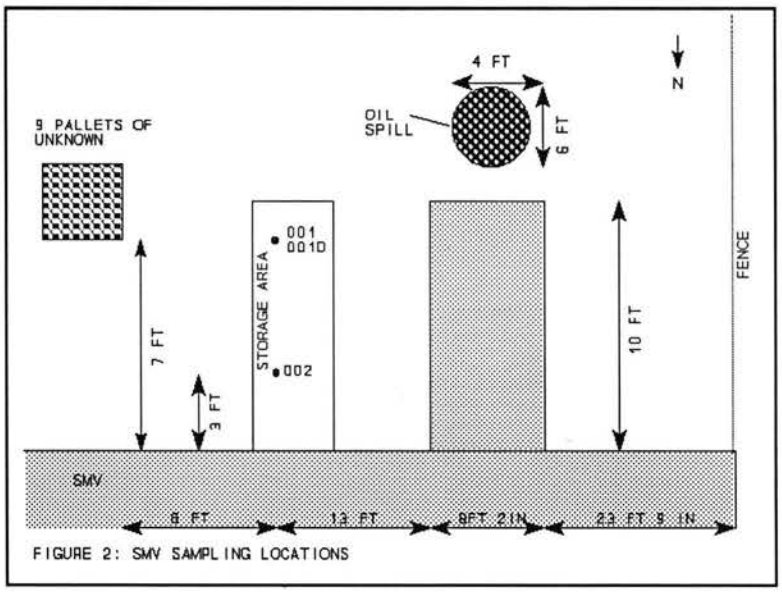

FIGURE 2: SMV SAMPLING LOCATIONS

2. Locate the First Sampling Point

The first sampling point was located in a low spot as stated in the plan and shown in Figure 2 and photos 9 and 10.

3. Auger Down to Collect First Sample

Mr. Welchoff removed the top layer of leaves and lose gravel from the area with his hands. He then augered down using a one foot stainless steel auger pass the gravel. The gravel depth ranged from about three to eight inches in the storage area. He then augered down once and filled two of his vials and Mr. Sperry filled one labeled vial for EPA. Mr. Welchoff augered down again

and three EPA vials were filled, two of which were for a duplicate sample. Mr. Welchoff packed the soil into the VOAs using a blunt rod that was covered with a protective glove. Mr. Sperry packed the soil into the labeled VOAs using a stainless steel spoon.

Mr. Welchoff then filled an aluminum pan with more soil (including what was remaining from the filling the last above VOAs) from the sample hole. In order to collect enough sample, he had to removed the gravel from around the hole with his hands as the auger was only one foot long. Mr. Sperry then mixed this soil with a stainless steel spoon and split it to collect the contractor's sample and EPA's sample #001 and its duplicate for metal analysis. The container used by Mr. Welchoff consisted of a 150 mL amber glass jar and EPA's containers consisted of labeled 8oz. glass jars.

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Gloves were worn by the contractor and by Mr. Sperry to collect samples.

4. Clean Auger

The auger was cleaned with alconox soap and DI water. It was then air dried.

5. Collect the Second Sample

The second sample point was located in a low spot and was collected in the same manner as discussed above, see Figure 2 and photo 11. This sample was collected between 8 and 12 inches. No detections were measured on the Hnu meter during the collection of the second sample. The second sample was noted as North by the contractor and #002 by EPA.

6. Sample Containers / Sampling Plan Deviation

After each sample was collected, Mr. Welchoff put the VOAs in a plastic ziploc type bag and the bags were labeled with waterproof ink as South and North respectively. He also labeled the tops of the jars with the North and South designation and date. The samples were placed in a cooler for preservation.

The labeling described above was a deviation from the plan prepared by HWS Consulting Group as it states that the containers would be labeled immediately after collecting with gummed paper labels with the information shown in attachment 4. Mr. Welchoff stated that he does not label the VOAs individually in the field due to the solvents present which may cause the ink to come off or due to the solvents present in the ink interfering with the sample. He stated that when he gives the samples to the lab, the lab will put the individual labels on.

7. Recording Sampling Information

Mr. Welchoff recorded the required information in his bound field note book after the sampling was completed.

8. The contractor's samples were transported to the Analytical Service Division of HWS Consulting Group, Lincoln, NE.

c. EPA Samples

A sampling plan was prepared by the permit writer, Harriet Jones, see attachment 6. As the permit writer requested splits, the samples were collected (augered) by HWS Consulting Group as discussed above. The field sheets of the above samples are shown in attachment 7-2 through 7-5. After the samples were collected, they were packaged as stated in EPA's plan (attachment 6). The samples were transported to the EPA Laboratory for analyses on 11/1/94, see attachment 7-6 for the Chain-of Custody form.

The results of the analyses are shown in attachment 8. Please note that the volatile samples were not actual splits, but adjacent samples as they were not mixed due to the possibility of the volatiles escaping. Also 001 and 001D for the volatiles were not actual duplicates for the same reason.

Dedriel Newsome

Dedriel L. Newsome
Environmental Engineer
Date: 11/22/94
Activity No.: ANF74

Joe Arello

Joe Arello
Chief, Compliance Assurance Section
Date: 11/23/94

Attachments

1. Confidentiality Notice (2 pages)
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6. EPA's Sampling Plan (11 pages)
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8. Analytical Results (4 pages)

Photo Log (2 pages)
Photographs (4 pages / 11 photos)

SO NO. SG070A

Attachment 4

DOCUMENT CONTROL CHECK SHEET

Media: Air	RCRA	Water	Other specify
	X		

Activity Number: ANF 74

Facility/Site Name and Location: SMV Industries
Council Bluffs

State: IA	KS	MO	NE
X			

The following documents pertaining to this activity are contained in this package:

Document		Yes	No	NA
Final Report w/attachments	69 Pages	(✓)	( )	( )
Field Sheets w/ report	___ Pages	(✓)	( )	( )
Chain-of-Custody Records w/ report	___ Pages	(✓)	( )	( )
Field Notes	14 Pages	(✓)	( )	( )
Analytical Data Sheets	___ Pages	(✓)	( )	( )
Photographic Negatives	12	(✓)	( )	( )
Photographs (not included w/report) Double prints of 1 photo	2	(✓)	( )	( )
Preinspection Packet	___ Pages	(✓)	( )	( )
Other Documents (list below)		( )	( )	( )
Sampling Request	6 Pages			
Closure Sampling Request Info	3 Pages			
	___ Pages			

(Note: If additional space is needed to list specific documents, utilize reverse side.)

CERTIFICATION

I, the undersigned, certify that all of the documents pertaining to this activity that were in my possession have been listed above and were included in this package at the time this statement was signed.

Daniel Newsome
Activity Leader's Signature

11/22/94
Date Signed

· Gloves/Diapers
Copy of ASR/Samp Plan
Tape Measure

(1)

SMV 10/31/94
1103 S. 6th Street
Council Bluffs, IA

Project Representative

Clear, sunny
Temp 65
grab

pg. 5

- Select samples @ topographic low spots w/i stg area

3'-8"

- Collect @ 6" to 1' below surface [EPA Plan: Measure location from 2 different fixed permanent landmarks to nearest 0.1 ft]

- Use a stainless steel backsaver sampling device to collect sample

soil slightly moist. Trace ... North 8'-11" 9'-1.3
3'-8" South gravel 1'3" in hole

- Record info in indelible ink in a hardback, bound, identified & sequential # Field notebook

intake air compressor

date time

Date & sign ID#, date, time collected, samp location & pt, facility ID, sample type (grab, flow composite, ~~time composite~~) analyses requested, preservatives added, sample matrix & descrip of declared component if known & field measurements, etc.

Oil

1' 8'8"

23'9"

- Label containers immediately after ~~sampling~~ collection w/ gummed paper label w/ fac name, loc, pt, depth (if applied), type, #, date & time, analyses requests & preservatives etc
locat.

- Cool 4°C (hold no longer than 14 days)

(one in samp plan on back)

- Seal Custody Tape

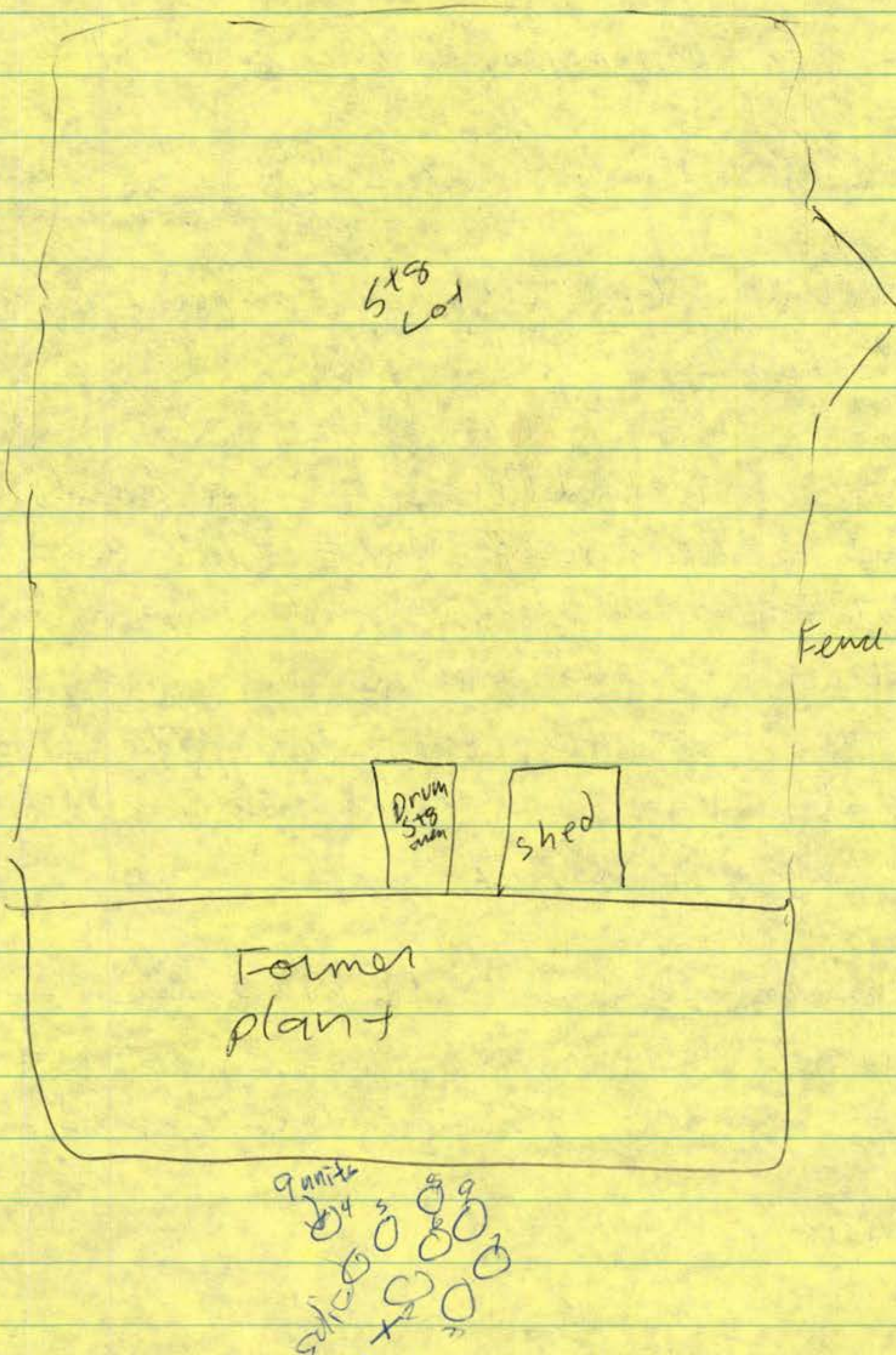
Make a layout

- Names of contractor samplers & the Co name HWS Consulting Group | Names of equip/Type etc.
~~Sean Brown~~ SJCF

- Where they will send their samples (Lab Name City, St) call Sean he didn't know

- # samples & their sample #s

(2)

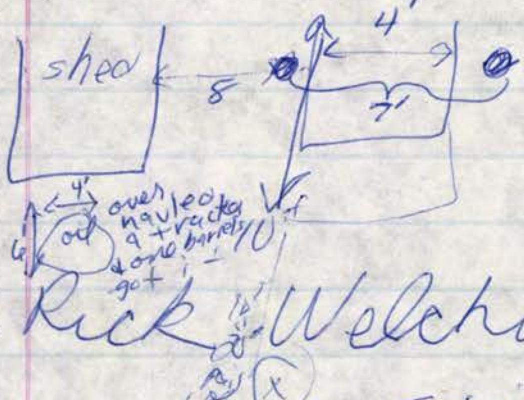


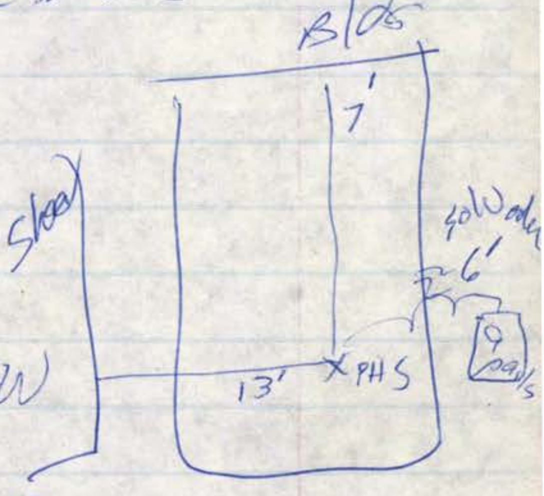
③

Rick HWS
825 J Street
Lincoln, NE 402 479 2200

Carole Shaffer, supv.
been long as he has 2

South





11:00
11:30 Rick Welchoff,
Stainless stee
11:00 4" Hand

gravel
3-8" of gravel

augered down pass gravel

augered once & filled his 2 VOAs & 1 of ours augered again & filled our 1 other samp & the 2 D VOAs used his in hole again after 2 aug. more augers for metal trace

10-2
HW meter
Ø on augered hole
In sample

Benzene
toluene

dug out

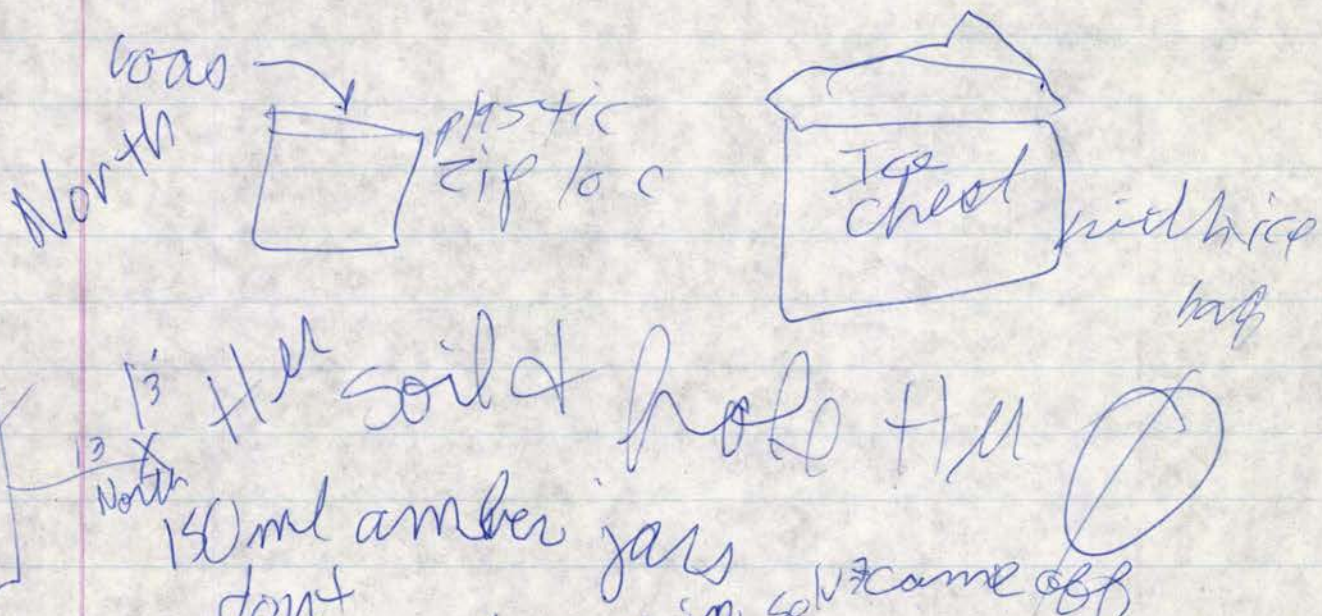
? rewill

Equipment Trip Blanks
Cleaned auger & trip is ringht from that sample

Water Blank

Alconox soap w/ DI H_2O
+ ~~Alconox~~ & rinse DI H_2O

002
11:42 — Removed grass
12:06 Augered & Clint filled 2-



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VII
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

October 6, 1994

MEMORANDUM

SUBJECT: Request for Assistance

FROM: Harriett Jones, RCRA/IOWA

TO: Joe Arello, Chief, ENSV/EMCM

The purpose of this memorandum is to provide additional detail regarding my recent request to you for assistance. Thank you for your willingness to work with us on this project.

Typically, when facilities in Iowa implement their RCRA EPA-approved closure plans, to decontaminate areas previously used for hazardous waste storage, we have been arranging for oversight, and sometimes split or duplicate samples. In the past we have used TES and REPA contractors to perform this oversight task. However, as you are aware, effective October 1, 1994, we have been precluded by HQ from using contractors to perform inspections. Therefore, we are looking to ENSV to assist us by providing the oversight support we require.

SMV Industries, 1103 S. 6th Street, Council Bluffs, Iowa will be implementing their EPA-approved closure plan on October 31, 1994. They will be collecting soil samples at on outdoor gravel-based former storage area, to determine if any hazardous wastes have been spilled. It is a small area and based upon the fact that no indications of release have been identified, only two samples will be collected. These are to be analyzed for toluene, xylene, ethylbenzene, lead, chromium and tetrachlorethylene.

The assistance we require is that an inspector travel to the site and observe the collection of the samples to verify that SMV's contractor is following the procedures described in the EPA-approved closure plan and also in SW-836. We are also requesting that the inspector gather two soil samples for analysis by EPA's laboratory as a quality check against the facility's analytical results.

Attached is a summary sheet. The clean-up levels represent the minimum detection limits that can be tolerated. I have also sent to you, via the inter-office mail, a copy of the EPA-

approved closure plan including EPA's modifications to that plan, an ASR, and a Sampling Plan/Quality Assurance Project Plan.

We are very appreciative of your willingness to support us. If you have any further questions, please let me know. My extension is 7730.

Attachment

CLOSURE SUMMARY

Facility Name: SMV Industries

Facility Address: 1103 S. 6th Street, Council Bluffs, Iowa

EPA RCRA ID Number: IAD984566034

Facility Point of Contact: Mr. Billy Jarrell, Plant Manager
712-323-1166

Unit(s) Undergoing Closure: one container storage area

Wastes Managed in Unit(s): D002, D007, D008, F003, F005

Closure Activities: Soil sampling of outdoor gravel-based storage area with removal of any contaminated soil media identified

Clean-up Objectives:

HAZARDOUS CONSTITUENT	SOIL, mg/kg	RINSEWATER, mg/l	GROUNDWATER, mg/l
Toluene	500	n/a	n/a
Xylene	500	n/a	n/a
Ethylbenzene	10	n/a	n/a
Lead	100	n/a	n/a
Chromium	100	n/a	n/a
Tetrachloroethylene	05	n/a	n/a

Public Notice Period: From September 26, 1994 to October 26, 1994

Published in Council Bluffs newspaper (Non Pareil) on September 26, 1994.

Post-it™ brand fax transmittal memo 7671 | # of pages ▸ 2

To	From
JOE ARELLO	BARRETT JONES
Co. COMPLIANCE ASSURANCE	Co.
Dept. ENSV LAB	Phone #
Fax # 551-5218	Fax # 551-7521

USEPA Region VII Analytical Services Request (ASR) Form

Activity No.: _____ Date: October 6, 1994
Site Name, City, & State: SMV Industries, Council Bluffs, IA
EPA Project Manager: Harriett Jones
Section/Branch: RCRA/IOWA Phone No.: 551-7730
Contractor Contact: n/a
Contractor: _____ Phone No.: _____
Projected Sample Delivery Date: 10/31/94
Funding Program Element: _____

Request Summary:

No. of Samples	Matrix	Group/Parameter Name	Group/Parameter MGP Code
2	soil	toluene, xylene, ethylbenzene, tetrachloroethylene, lead, chromium	

Use additional pages as needed for clarity.

Levels Of Interest Are Specified (mark one): In The QA Document-☐
or On The Back-X

Special Requirements or Comments:

NOTE: Submit This Form To RQAM/ENSV 30 Days Before Sample Delivery

Approvals:

Harriett Jones 10/6/94 James V. Collins 10/7/94
EPA Project Manager (Date) EPA Branch or Section Chief (Date)

The Following Is Completed By ENSV Personnel ONLY

QA Document: ☐-Generic QAPP ☐-Site Specific QAPP ☐-Other: _____

Concurrences:

RQAM: _____ Comment: _____

Chief, LABO: _____ Comment: _____

Laboratory Assignment:

☐-Region VII _____
☐-ESAT _____
☐-CLP _____
☐-RECAP _____
☐-Other _____

Scheduled Completion:

☐-Routine:
- Non-CLP = 4 weeks
- CLP = 8 weeks

☐-Other: _____

Date: _____

Levels Of Interest

(Use Additional Copies Of This Form As Needed)

Activity No.: ______ Site Name: SMV Industries, Council Bluffs, IA

Individual Parameter/ Parameter Group	Matrix	Concentration Level of Interest	Units
toluene	soil	500	mg/kg
xylene	soil	500	mg/kg
ethylbenzene	soil	10	mg/kg
tetrachloroethylene	soil	5	mg/kg
lead (total)	soil	100	mg/kg
chromium (total)	soil	100	mg/kg
lead (TCLP)	soil	5	mg/l
chromium (TCLP)	soil	5	mg/l

SMV Industries Council Bluffs, IA
10/31/94

Hnu near area of sample point 001
and 001D.

D. Newsome

SMV Industries Council Bluffs, IA
10/31/94

Hnu near area of sample point 001
and 001D.

D. Newsome

CLOSURE SUMMARY

Facility Name: SMV Industries

Facility Address: 1103 S. 6th Street, Council Bluffs, Iowa

EPA RCRA ID Number: IAD984566034

Facility Point of Contact: Mr. Billy Jarrell, Plant Manager
712-323-1166

Unit(s) Undergoing Closure: one container storage area

Wastes Managed in Unit(s): D002, D007, D008, F003, F005

Closure Activities: Soil sampling of outdoor gravel-based storage area with removal of any contaminated soil media identified

Clean-up Objectives:

HAZARDOUS CONSTITUENT	SOIL, mg/kg	RINSEWATER, mg/l	GROUNDWATER, mg/l
Toluene	500	n/a	n/a
Xylene	500	n/a	n/a
Ethylbenzene	10	n/a	n/a
Lead	100	n/a	n/a
Chromium	100	n/a	n/a
Tetrachloroethylene	05	n/a	n/a

Public Notice Period: From September 26, 1994 to October 26, 1994

Published in Council Bluffs newspaper (Non Pareil) on September 26, 1994.

S. M. V. Industries, Inc.
P.O. Box 1094 - Council Bluffs, Iowa 51502
Telephone 712-323-0656

September 27, 1994

Ms. Harriett L. Jones
United States Environmental Protection Agency
Region VII
726 Minnesota Avenue
Kansas City, Kansas 66101

Dear Ms. Jones,

In compliance with RCRA Docket No. VII-93-H-0004, Section 9-C, sampling activities for SMV Industries approved closure plan are scheduled for October 31, 1994, as set forth in the attached letter.

Sincerely,

David Grundahl

David Grundahl

DG/co

cc: Lawrence Beckman

HWS Consulting Group Inc.

LINCOLN OFFICE
825 J Street, Box 80358
Lincoln, NE 68501-0358
402/479-2200
FAX 402/479-2276

Solutions Through Service

50 Years 1944 1994

September 23, 1994

Mr. David Grundahl
SMV Industries
P.O. Box 1094
Council Bluffs, IA 51502

REFERENCE: Closure Implementation

Dear Dave:

In accordance with your request, we have scheduled for personnel to conduct closure activities (collect two (2) soil samples) in accordance with the approved Closure Plan on October 31, 1994.

If you have any questions, please call me at (402) 479-2200.

Sincerely,

HWS CONSULTING GROUP INC.

Sean D. Brown
Project Manager

SDB/jcm
72-45-0045
ENVSCI15G

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
CONFIDENTIALITY NOTICE

Facility Name SMV Industries	
Facility Address Council Bluffs, IA	
Inspector (print) Title Dedriel Newsome Env. Engineer	
U.S.EPA, Region VII, ENSV Division, 25 Funston Road, Kansas City, KS 66115	Date 10/31/94

It is possible that the United States Environmental Protection Agency (EPA) will receive public requests for release of the information obtained during inspection of the facility above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 U.S.C. 552; EPA regulations issued thereunder, 40 CFR Part 2; and the applicable statute under which the information is obtained. EPA is required to make inspection data available in response to FOIA requests, unless the Agency determines that the data contains information entitled to confidential treatment.

Any or all of the information collected by EPA during the inspection may be claimed confidential, if it relates to trade secrets or commercial or financial matters that you consider to be confidential. If you make claims of confidentiality, EPA will disclose the information only to the extent, and by the means of the procedures set forth in the regulations (cited above) governing EPA's treatment of confidential information.

To claim information confidential, you must certify that each claimed item meets <u>all</u> of the following criteria (40 CFR 2.208):

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.
2. The information is not, and has not been, reasonably obtained without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on showing special need in a judicial or quasi-judicial proceeding).
3. The information is not publicly available elsewhere.
4. Disclosure of the information would cause substantial harm to your company's competitive position.

<u>In addition</u>, within fifteen (15) calendar days of the claim, you must provide written comments in support of the claim, based on factors listed in 40 CFR 2.204(e)(4). This statement should be mailed by registered, return-receipt requested mail to the Inspector at the address listed above. Failure to submit comments by this deadline will be deemed a waiver of the claim pursuant to 40 CFR 2.205(d)(1).

At the completion of the inspection, you will be given a receipt for all materials collected. At that time you may make claims that some or all of the information is confidential and meets the criteria listed above.

U.S.EPA INSPECTION CONFIDENTIALITY NOTICE (cont.)

Facility Name
SMV Industries
Facility Address
Council Bluffs, IA

If you are **not** authorized by your company and there is no one on the premises of the facility who is authorized to make confidentiality claims, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials, to the authorized representative designated below.

Authorized Representative _____

Title _____

Address _____

_____

If the authorized representative listed above requests confidential treatment, they must return a statement specifying any information which should receive confidential treatment and written comments in support of the claim based on factors listed in 40 CFR 2.204(e)(4).

This statement from the authorized representative should be mailed by registered, return-receipt requested mail within fifteen (15) calendar days of receipt of the Confidentiality Notice to the Inspector at the address listed on page 1.

Failure to submit confidentiality claims and comments within the fifteen (15) day period will be deemed a waiver of the claim pursuant to 40 CFR 2.205(d)(1).

==========

To be completed by the facility official receiving this Notice:

I have received and read this Notice.

Facility Representative Provided Notice (print)	Title
Supervisor	
Signature/Date	
Carroll Shaffer	10-31-94

(rev:1/20/93)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REQUEST FOR CONFIDENTIAL TREATMENT

Facility Name
SMV Industries
Facility Address
Council Bluffs, IA

Information for which confidential treatment is requested:

Acknowledgement of Claimant

The undersigned requests that confidential treatment of the information described be provided in accordance with provisions of the Freedom of Information Act (FOIA), 5 U.S.C. 552; EPA regulations issued thereunder, 40 CFR Part 2; and the applicable statute under which the information is obtained. The undersigned further acknowledges that they are authorized to make such claims for their firm.

The undersigned also certifies that each claimed item described above meets all of the following criteria (40 CFR 2.208):

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.
2. The information is not, and has not been, reasonably obtained without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on showing of special need in a judicial or quasi-judicial proceeding).
3. The information is not publicly available elsewhere.
4. Disclosure of the information would cause substantial harm to your company's competitive position.

In addition, within 15 days of your claim, you must provide written comments in support of the claim, based on factors listed in 40 CFR 2.204(e)(4). Failure to submit comments by this deadline will be deemed a waiver of the claim pursuant to 40 CFR 2.205(d)(1).

Authorized Representative (print)	Signature/Date
Carroll Shoffner	Carroll Shoffner 10-31-94
No confidential treatment claimed during the inspection: CS (Facility Representative's initials)	
Inspector (print)	Signature/Date
Dedriel Newsome	Dedriel Newsome 10/31/94
U.S.EPA, Region VII, ENSV Division, 25 Funston Road, Kansas City, KS 66115	

(rev:1/20/93)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RECEIPT FOR DOCUMENTS AND SAMPLES

Facility Name
SMV Industries
Facility Address
Council Bluffs, IA

Documents Collected? YES___ (list below) NO___

Samples Collected? YES✓ (list below) NO___ Split Samples: YES___ NO✓

Documents/Samples were: 1)Received no charge✓ 2)Borrowed___ 3)Purchased___

Amount Paid: $_____ Method: Cash___ Voucher___ To Be Billed___

The documents and samples described below were collected in connection with the administration and enforcement of the applicable statute under which the information is obtained.

==========

Receipt for the document(s) and/or sample(s) described below is hereby acknowledged:

Sampled Drum Storage area
2 samples
#001 South
001D South
002 North

Facility Representative (print)	Signature/Date	
Carroll Shaffer	Carroll Shaffer	10-31-94
Inspector (print)	**Signature/Date**	
Dedriel Newsome	Dedriel Newsome	10/31/94
U.S.EPA, Region VII, ENSV Division, 25 Funston Road, Kansas City, KS 66115		

(rev:1/20/93)

SEP 21 1994

Dave Grundahl
Mr. Billy Jarrel
SMV Industries, Inc.
P. O. Box 1094
Council Bluffs, IA 51502

Dear Mr. Jarrel:

Re: Tentative Closure Plan Approval for
SMV Industries, Inc.
Council Bluffs, Iowa
EPA RCRA ID No. IAD984566034
Docket No. VII-93-H-0004

The tentative decision has been made to approve, with modifications, the May 1994 closure plan for the hazardous waste container storage area which was operated at the referenced facility. The closure plan was submitted as required by the June 1994 Consent Agreement and Consent Order, Docket Number VII-93-H-0004.

The U. S. Environmental Protection Agency (EPA) herein modifies the May 1994 closure plan with the inclusion of the modifications listed in the enclosure titled "Closure Plan Modifications, September 1994." The modifications, which are summarized below, are necessary in order that the closure plan comply fully with the requirements specified in Title 40 Code of Federal Regulations (CFR) Part 265 Subpart G.

The closure plan was modified to include clean-up target levels, or closure performance standards, for soil. These criteria are necessary so that the results of the soil analyses can be compared to a clean-up criteria, and a judgement made regarding whether or not contamination above health-based levels is present and thus whether or not further closure activities are necessary. Other modifications include clarification of the facility location, clarification of the sampling protocols to be followed, and the inclusion of a requirement to notify EPA thirty days prior to the sampling event so that EPA may arrange for closure oversight.

The thirty (30) day public notice regarding EPA's tentative decision to approve the closure plan, which is required by 40 CFR § 265.112(d), is scheduled to begin on September 26, 1994. An announcement of the public notice will appear in the local newspaper, the Non Pareil, on the first day of the public notice

RCRA\IOWA\JONES\D.HJ\6034SMV.LTR\SL\SMV.LTR\jah\9-20-94
IOWA IOWA
JONES CALLIER
9/20/94 9/20/94

period. A copy of the information being made available for public review is enclosed. You are invited to submit written comments and/or request a public hearing at any time prior to the expiration of the public comment period. All comments submitted during the comment period will be addressed prior to the approval of the closure plan.

The EPA is fully responsible for all Resource Conservation and Recovery Act (RCRA) program activities in Iowa. Therefore, in accordance with 40 CFR § 265.112, EPA Region VII will issue the final closure plan decision.

We appreciate your cooperation in providing information during the closure plan review process. Any questions concerning this letter may be directed to me at (913) 551-7730.

Sincerely,

Harriett L. Jones, P. E.
Project Manager
IOWA Section, RCRA Branch

Enclosure

cc: Joseph Obr, IDNR (w/o encl)

bcc: Jennifer MacDonald, CNSL

RECEIVED
JUN 07 1994
IOWA SECTION

Closure Plan
for
SMV Industries
Hazardous Waste Container Storage Area

In Accordance With

U.S. Environmental Protection Agency
Resource Conservation and Recovery Act
Hazardous Waste Management Rules and Regulations
40 CFR Part 265, Subparts G and H

May 1994

Prepared By:

HWS CONSULTING GROUP INC.
825 "J" Street
Lincoln, Nebraska 68508

CLOSURE PLAN MODIFICATIONS

September 1994

Facility: SMV Industries Inc
Location: Council Bluffs, Iowa
EPA RCRA ID #: IAD984566034

The following modifications amend the May 1994 closure plan.

1. The facility location listed in the May 1994 closure plan is incorrect. The location of the facility to which the EPA RCRA ID number referenced above was issued is 1103 S. 6th Street. (The May 1994 closure plan incorrectly states that the facility is located at 1026 S. 6th Street.)

2. The following closure performance standards are specified for soil:

Toluene	500	milligrams/kilogram (mg/kg)
Xylene	500	mg/kg
Ethylbenzene	10	mg/kg
Tetrachloroetylene	5	mg/kg
Lead	100	mg/kg
Chromium	100	mg/kg

The soil samples collected will be analyzed for total levels of each of these hazardous constituents. Results of analysis will be compared to these closure performance standard levels. If any samples are found to exceed any of these levels, then additional sampling will be conducted to determine the vertical and horizontal extent of contamination. If excavation and disposal of any contaminated soil (i.e., soil which exhibits levels of any of the constituents of concern in excess of the closure performance standards) is determined to be necessary, the excavated soil (as well as any other hazardous wastes generated during closure plan implementation) will be managed as a hazardous waste.

3. All sample collection, preservation and analysis will be performed in accordance with the procedures and protocol described in SW-846, "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods."

4. During the period of time between the initiation of closure plan implementation and acceptance of the closure certification by EPA, the area undergoing closure will not be used for waste accumulation or storage.

5. All documentation supporting the closure certification statements will be submitted to EPA with the certification statements of the owner/operator and certifying engineer. This documentation will include photographs, laboratory analyses, and narrative reports.

6. EPA will be provided with at least thirty days notice of the date on which the sampling to verify clean closure is to be performed so that the necessary arrangements can be made to have an EPA staff member or authorized Agency representative on-site to observe the sampling, and to collect split samples or duplicate samples, if determined to be necessary.

*** END OF MODIFICATIONS *

TABLE OF CONTENTS

FIGURES

APPENDIX

1.0 INTRODUCTION

SMV Industries (SMV) manufactures and distributes a variety of products and tools including Anchor-Eze tie-down loops, chainbinders, cultivator shields, electric fence posts, fence post drivers, milo guards, rake teeth, rubber fasteners, screw jacks, hammers, bolt cutters, pliers, socket sets, vises, and wrenches. Paint waste has been historically generated as a result of painting of fence posts and metal cleaning waste is generated from the cleaning of metal parts and components.

SMV stored 2-3 drums of waste paint/corrosive cleaner in a gravel covered area outside of the SMV plant while its waste profile was being transmitted to several licensed treatment storage and/or disposal facilities (TSDF's). Since the waste was a combination of paint related waste/solvent and a corrosive cleaner with low concentrations of metals, it was rejected by two (2) TSDF's. SMV was not aware that they could have requested an extension to the 270 day limit for storage of hazardous waste without a permit. As a result of the delays in acceptance of the waste, SMV stored the materials for greater than 270 days. EPA determined that SMV had operated a storage facility without a permit and was directed to close the hazardous waste storage area in accordance with 40 CFR 265.110 - 115, and 265-116 to 265.120, if applicable. The purpose of this closure plan is to satisfy these requirements.

Since the inspection, 2 drums of waste were shipped to a licensed hazardous waste management facility.

SMV proposes to formally clean close the storage area at the SMV plant in accordance with 40 CFR 265.111, and in a manner that: (a) minimizes the need for further maintenance, and (b) controls, minimizes or eliminates, to the extent necessary to protect human health and the environment, post closure escape of hazardous waste, hazardous waste constituents, leachate, or waste decomposition products to the ground or surface waters or to the atmosphere.

In general, the closure of the facility will be performed in the following manner:

1. Preparation and shipment of all stored materials to a licensed hazardous waste management facility (completed).

2. Development of a subsurface investigation to verify clean closure.

3. Comparison of soil sampling results to EPA recommended action levels and to background.

4. Preparation and submittal of report summarizing all activities.

Certification of closure will be provided as required by 40 CFR 265.115.

2.0 CLOSURE PLAN

2.1 Closure Plan Administrative Procedures

1. SMV will keep a written closure plan at the SMV plant (site of the former storage area) until all closure operations are completed, after which the plan will become part of the plant's permanent records.

2. Mr. Dave Grundahl (or other facility employee as designated by SMV) will be responsible for maintaining the plan, revising and updating the plan as necessary, and implementing the plan.

3. Records of closure plan revisions and updates will be retained at SMV for the care period of closure. However, this retention is automatically extended during the course of any unresolved enforcement action regarding the facility, or as requested by the EPA Region VII Administrator.

4. The closure plan and related records will be furnished, upon request, and made available at all reasonable times for inspection by any officer, employee, representative, or designee of the EPA.

5. Any revisions to the approved closure plan will be submitted to and approved by the EPA Region VII Administrator.

6. The Regional Administrator can be contacted by writing or calling:

   - United States Environmental Protection Agency
     Region VII
     726 Minnesota Avenue
     Kansas City, KS 66101
     (913) 551-7633

7. It is the intention of this closure plan to meet the "Closure Performance Standard", as stated in 40 CFR 265.111.

2.2 Facility Description

2.2.1 General Facility Information

The SMV plant is located in the City of Council Bluffs, Pottawattamie County, Iowa, at 1026 South 6th Street, in the NW1/4, SE1/4, SW1/4, Section 36, T75N, R44W. The SMV plant site is comprised on approximately 2-3 acres upon which several buildings are situated. The plant property is presently surrounded by industrial land. Figure 1 is a 7.5 minute topographic map showing the facility location and topographic features.

2.2.2 Storage Area

The hazardous waste storage area consists of a gravel covered area 10 feet by 4 feet (40 square feet) and is shown at Figure 2. The storage area is located to the north of the former SMV plant building. The building had a fire in it and is now no longer in use.

Prior to their shipment, the drums were closed, clearly labeled, and secure in a locked, fenced-in lot.

2.2.3 Waste Characterization

SMV generates a paint related hazardous waste in connection with the painting and cleaning of rake teeth and hooks. As a result of the cleaning, waste paint, solvent, and adhesive is generated. The waste consists of the following:

Constituent	*Concentration*
Liquid Portion	
Toluene	45 - 95%
Xylenes	0 - 25%
Aliphatic Hydrocarbons	0 - 20%
Ethylbenzenes	0 - 10%
pH	11 - 12.5%
MIBK	0 - 59%
Tetrachloroethylene	0 - 15%
Solids/Sludge Portion	
Lead Chromate (from MSDS sheet)	0 - 15% in virgin paint

Applicable waste codes for this waste is: D002, D007, D008, F003, and F005

SMV generates approximately one fifty-five (55) gallon drum of hazardous waste every 1 1/2 months.

2.3 Closure Procedures

2.3.1 Shipment of Waste/Facility Inventory

SMV shipped 2-3 drums of hazardous waste for which this closure plan is written, to a licensed TSDF on June 15, 1990. An additional 12-13 drums of hazardous waste which had been generated subsequent to the 2-3 drums (held only 277 days) were also sent with this shipment.

2.3.2 Soil Sampling Protocol

SMV proposes to implement a soil sampling program to determine if a release to the subsurface has occurred.

Since waste materials were stored in the storage area for a limited time and the drums were in good condition, it is very unlikely that residues from these drums were released into soils. However, in order to substantiate clean closure, SMV proposes the following sampling activities.

SMV proposes to collect subsurface soil samples for EPA Method 8240, pH, TCLP lead, and TCLP chromium at two (2) locations within the hazardous waste storage area. The actual locations of the two (2) samples will be selected in the field at topographic low spots within the storage area. Samples will be collected at 6" to 1 foot below surface using a stainless steel backsaver sampling device.

All information pertinent to sample collection and subsequent analysis will be recorded in indelible ink in a hardback, bound, identified and sequential numbered ***Field Notebook***. Entries will be dated and signed by the sample collector and will include the following information: Field identification number, date and time collected, sampling location and sampling point, facility identification, sample type (grab, flow composite, time composite), analyses requested, preservatives added, sample matrix and description of declared components if know, observations, and field measurements, etc.

Each sample container will be labeled immediately after collection with a gummed paper label indelibly inscribed with the following information: facility name, sample location and sampling point, sample depth (if applicable), sample type, sample number, date and time collected, analyses requested, and preservatives added, etc.

Samples will be cooled to 4 degrees C and will not be held for longer than 14 days. Samples to be analyzed will be evaluated in conformance with Test Methods for Evaluating Solid Waste, EPA SW-846 Third Edition. Samples will be transferred from the sampling equipment directly into containers appropriately prepared and labeled in advance. After preservation, all sample containers will be sealed with custody tape in such a way that a violation of the sample's integrity would be evident by a broken seal. After sealing, the sample custody tape will be signed and dated by the sample collector. All sample containers will then be placed in an iced cooler and void spaces filled with packing material. Sample analysis request sheet and chain-of-custody documents will be sealed in a plastic bag and placed on top of the samples before sealing the shipment container with custody tape. Samples will then be sent to an approved analytical lab for analysis.

The precision and accuracy of all measurements will be routinely monitored by the inclusion of quality control samples which will be analyzed and statistically evaluated.

1. At least one in ten samples analyzed for any parameter will be a quality control sample evaluated for accuracy. This may be any one or more of the following:

   a. *A Matrix-Spike Sample* - a background split from the sample is analyzed simultaneously with another split which has been spiked with known quantity of the analyte of interest. The percent recovery of the added spike is calculated by comparison of the background with the spiked sample. Control limits are set at 90 - 110% recovery. Spike recoveries outside of these limits require repeating the analysis until recovery is in control, or use of the method of standard additions to account for matrix affects.

   b. *A Spike Blank* - an aliquot of reagent grade water is spiked with a known quantity of the analyte of interest and analyzed. The percent recovery of the analyte must be within the control limits of 90 - 110% recovery or the analysis is repeated.

   c. *A Known, Independently Verified Check Sample* - the sample is analyzed and the result compared to the true value. Control limits are set at $\pm$ three standard deviations from the true value. Results outside of these limits require repetition of all analyses performed for that analyte since the last acceptable QC result.

2. When new lots of reagents or solvents are used, or as required by the analytical method, reagent blanks are analyzed to demonstrate freedom from contamination by reagents, glassware or poor analytical technique.

3. These quality control measures are in addition to quality control samples taken as a check on sample collection and transport procedures. One (1) trip blank will be collected and transported as outlined above.

2.3.3 Subsequent Soil Sampling and Excavation and Remediation of Contaminated Soils

If the two (2) samples proposed identify a release to the subsurface in the hazardous waste storage area, a subsequent sampling scheme will be developed to determine lateral and vertical extent of contamination.

This subsequent sampling program will be submitted to the EPA prior to implementation if it is determined necessary.

If based on the subsequent sampling event, contamination is present at levels greater than recommended action levels in soils, SMV intends to excavate the soils and send them to a licensed TSDF.

2.4 Schedule of Final Closure

The projected schedule for final closure of the SMV facility shall be as follows. The days stated are the number of days after receiving approval of the closure plan from the EPA.

Item	*Days After Date of Approval*
Soil Sampling	30
Subsequent Soil Sampling (if necessary)	90
Excavation/Remediation (if necessary)	150

The total time to facilitate time will be 180 days after the closure plan has been approved by the EPA or may be extended per EPA Regional VII Administrator approval. The expected year of final closure is 1994.

2.5 Amendment to the Closure Plan

SMV will amend the closure plan if:

a. changes in operating plans or facility design affect the closure plan, or

b. there is a change in the expected year of closure, or

c. in conducting closure activities, unexpected events require a modification of the closure plan.

Any revisions to the closure plan will be submitted to and approved by Region VII Administrator.

2.6 Closure Certification

Within 60 days of completion of final closure, SMV and an independent registered professional engineer will provide certification that closure was performed in accordance with the approved closure plan. Certification of Final Closure will be conducted utilizing Figure 3.

2.7 Cost Estimate for Facility Closure

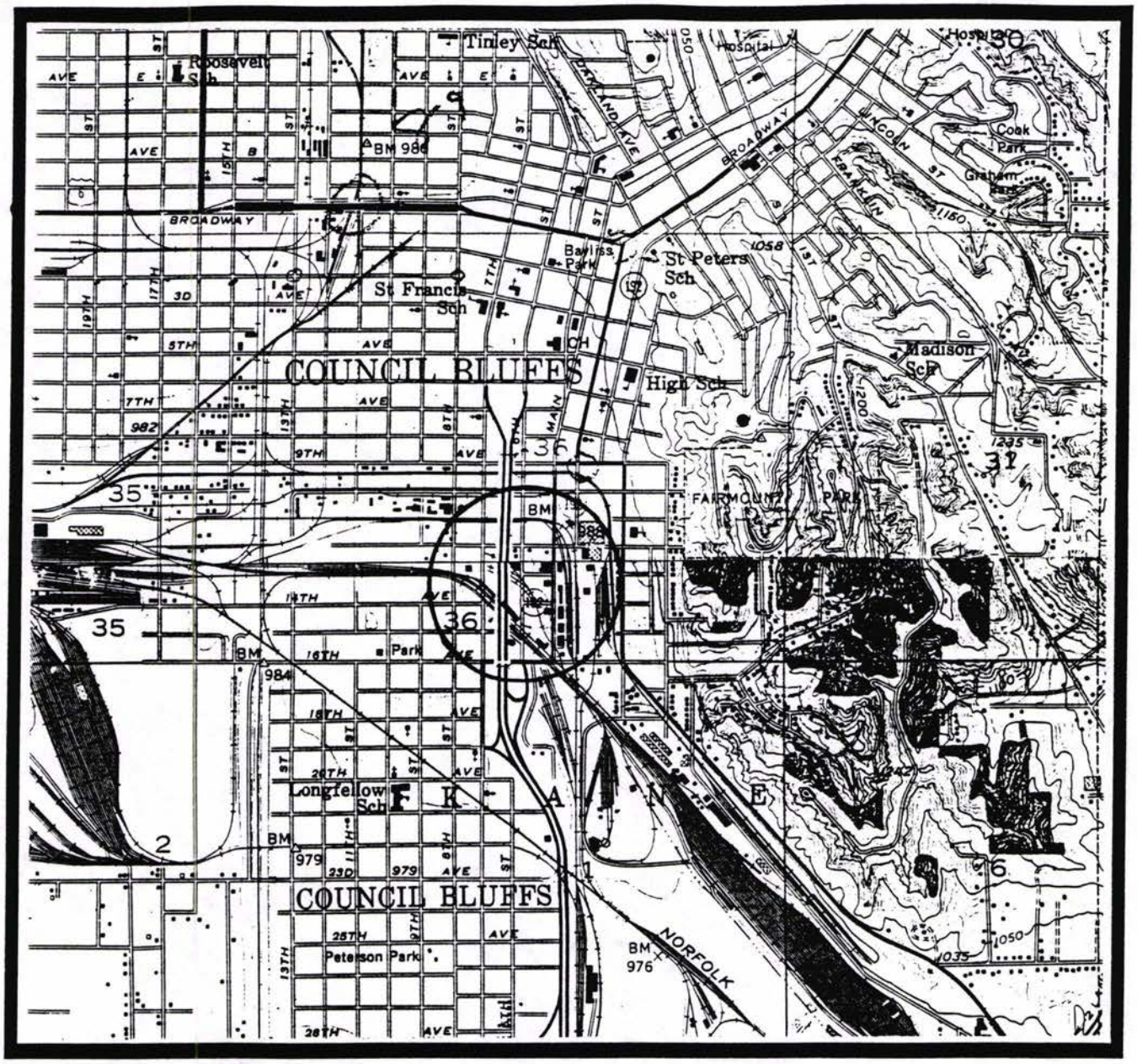
An estimate of the cost of closing the storage facility is shown below. The facility owner or his/her designee will prepare a new closure cost estimate whenever a change in the closure plan affects the cost of closure.

Cost Estimate for Closure
SMV Industries Inc.
May 1994

Analytical		
TCLP Lead & TCLP Chromium	$154/sample x 3 samples*	$ 462.00
pH	$8/sample x 3 samples*	24.00
EPA 8240	$310/sample x 3 samples*	930.00
	Subtotal	**$1,416.00**
Expenses		$ 100.00
Labor		
Sampler	$42.50/hr. x 5 hrs.	$ 212.50
Report Preparation	$70/hr. x 4 hrs.	280.00
Clerical	$27.50/hr. x 2 hrs.	55.00
	Subtotal	**$ 547.50**
Certification	$70/hr. x 4 hrs.	$ 280.00
	ESTIMATED TOTAL COST	**$2,343.50**

*2 samples and 1 trip blank for QA/QC

U.S.G.S. QUAD MAP



SCALE 1:24 000

1 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 5 0 1 KILOMETER

CONTOUR INTERVAL 10 FEET
NATIONAL GEODETIC VERTICAL DATUM OF 1929

UNITED STATES
DEPARTMENT OF THE INTERIOR
GEOLOGICAL SURVEY

HWS Consulting Group Inc.

FIGURE 1

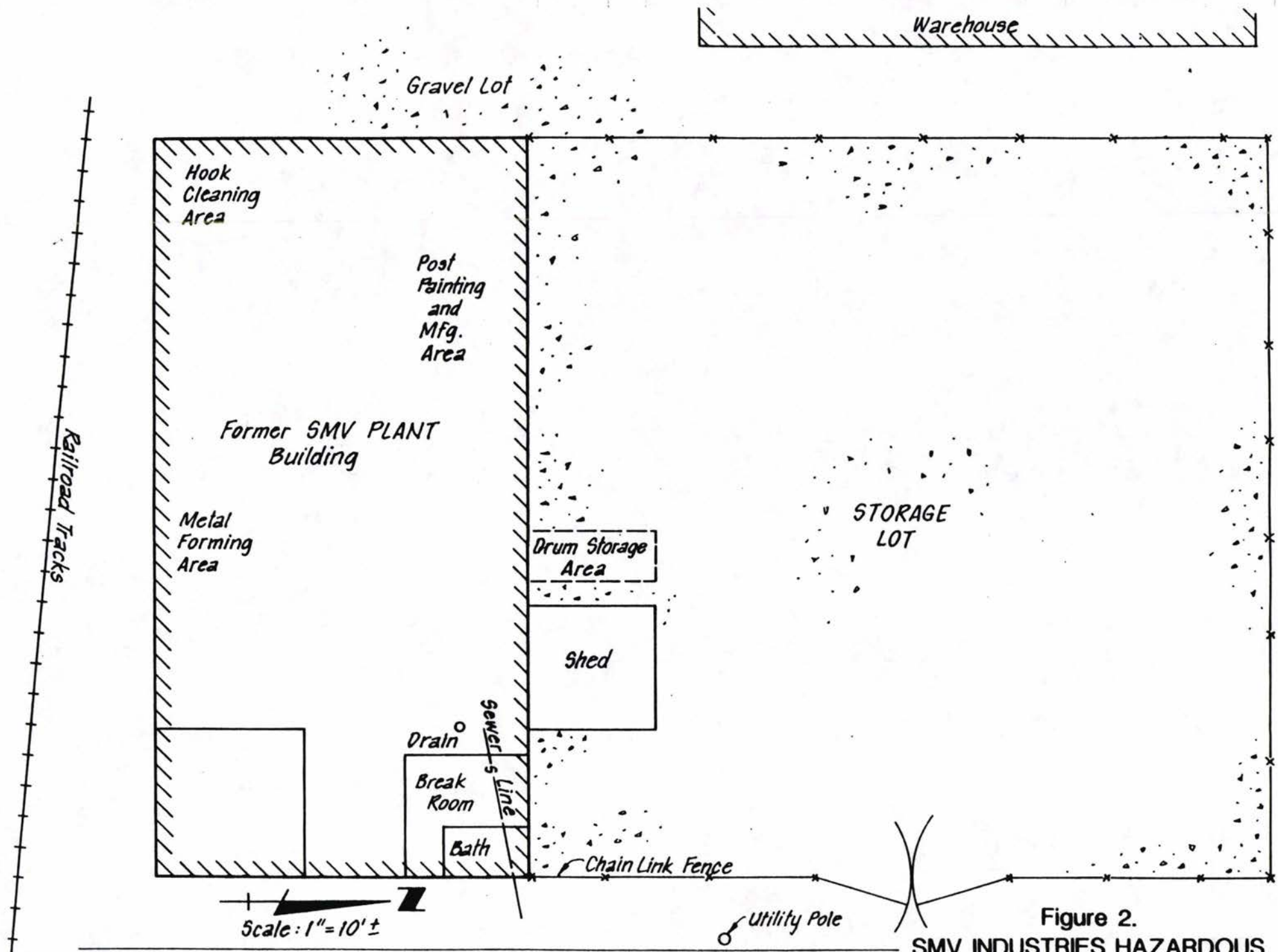


Figure 2.
SMV INDUSTRIES HAZARDOUS WASTE DRUM STORAGE AREA

HWS Consulting Group Inc
LINCOLN OFFICE
825 J St., Box 80358
Lincoln, NE 68501
402/479-2200

FIGURE 3

CERTIFICATION OF FINAL CLOSURE

OWNER'S CERTIFICATION

I, _____, of
(Owner's Name)

_____
(Name and Address of Hazardous Waste Facility)

hereby state and certify that, to the best of my knowledge and belief, the above-named hazardous waste facility has been closed in accordance with the attached approved Closure Plan, and that the closure was completed on the ____ day of _____, 19___.

_____ _____
Signature Date

ENGINEER'S CERTIFICATION

I, _____, a
(Engineer's Name)

certified professional engineer, hereby certify, to the best of my knowledge and belief, that I have verified all prior closure activities at

_____ and that
(Hazardous Waste Facility)

I have made visual inspections of the aforementioned facility, and closure of the aforementioned Facility has been performed in accordance with the Closure Plan for the Facility approved by the Director of the Nebraska Department of Environmental Control.

_____ _____
Signature Date

Licensed Professional Engineer No. _____ In the State of _____

_____ _____ _____ _____ _____
Business Address City State Zip Phone No.

APPENDIX A

WASTE PROFILE SHEET CODE

TSDF

A. GENERAL INFORMATION

GENERATOR NAME: SMV INDUSTRIES, INC.

FACILITY ADDRESS: P O BOX 1094

COUNCIL BLUFFS, IA 51502

TRANSPORTER

TRANSPORTER PHONE

GENERATOR USEPA I.D.: IA1798456034

GENERATOR STATE I.D.

TECHNICAL CONTACT: KIRK ELWOOD TITLE: PLT MGR PHONE: 712-323-1166

NAME OF WASTE: PAINT WASTE + SOLVENT

PROCESS GENERATING WASTE: CLEANING HOOKS - SOAKING

B. PHYSICAL CHARACTERISTICS OF WASTE

COLOR: VARIES

ODOR: ☐ NONE ☒ MILD ☐ STRONG — DESCRIBE: SOLVENT

PHYSICAL STATE @ 70°F: ☐ SOLID ☐ SEMI-SOLID ☒ LIQUID

LAYERS: ☐ MULTILAYERED ☒ BI-LAYERED ☐ SINGLE PHASED

FREE LIQUIDS: ☒ YES VOLUME: 9 - 4 %

pH: ☐ < 2 ☐ 2 - 4 ☐ 4.1 - 6.9 ☒ 7 ☐ 7.1 - 10 ☐ 10.1 - 12.5 ☐ > 12.5 ☐ EXACT: ☐ N/A

SPECIFIC GRAVITY: ☐ < 8 ☒ 8 - 1.0 ☐ 1.1 - 1.2 ☐ EXACT:

FLASH POINT: ☒ < 70°F ☐ 70°F - 100°F ☐ 101°F - 139°F ☐ 140°F - 200°F ☐ > 200°F ☐ NO FLASH ☐ EXACT:

BTU/LB ____ ASH ____ % CL ____ %

C. CHEMICAL COMPOSITION (TOTALS MUST ADD TO 100%)

VOGEL 1B-4603 PAINT	10-20 %
TOLUENE + XYLENE	80-99 %
	%
	%
	%
	%
	%
	%
	%
* See attached MSDS	%

D. METALS ☐ TOTAL (PPM) ☒ EPA EXTRACTION PROCEDURE (mg/L)

ARSENIC (As)	< 5	SELENIUM (Se)	< 1
BARIUM (Ba)	< 100	SILVER (Ag)	< 5
CADMIUM (Cd)	< 1	COPPER (Cu)	
CHROMIUM (Cr) *	present	NICKEL (Ni)	
MERCURY (Hg)	< 0.2	ZINC (Zn)	
LEAD (Pb) *	present	THALLIUM (Tl)	
CHROMIUM - HEX (Cr + 6)			

E. OTHER COMPONENTS - TOTAL (PPM)

CYANIDES	0	PCB'S	0
SULFIDES	0	PHENOLICS	0

F. SHIPPING INFORMATION

D.O.T. HAZARDOUS MATERIAL? ☒ YES ☐ NO

PROPER SHIPPING NAME: WASTE PAINT RELATED

HAZARD CLASS: FLAM LIQ, I.D. NO: UN1263, MATL

METHOD OF SHIPMENT: ☐ BULK LIQUID ☒ DRUM (TYPE/SIZE): 55 GAL

ANTICIPATED VOLUME: ____ GALS. 12 OTHER: DRUMS

PER: ☐ ONE TIME ☐ WEEK ☐ MONTH ☐ QUARTER ☒ YEAR ☐ ( )

G. HAZARDOUS CHARACTERISTICS

REACTIVITY: ☒ NONE ☐ PYROPHORIC ☐ SHOCK SENSITIVE ☐ EXPLOSIVE ☐ WATER REACTIVE ☐ OTHER:

OTHER HAZARDOUS CHARACTERISTICS

☐ NONE ☐ RADIOACTIVE ☐ ETIOLOGICAL ☐ PESTICIDE MANUFACTURING WASTE ☒ OTHER

USEAPA HAZARDOUS WASTE? ☒ YES ☐ NO

USEPA HAZARDOUS CODE(S): F003, F005, D008, D001

STATE HAZARDOUS WASTE? ☒ YES ☐ NO

STATE CODE(S): D001, D008, F005, F003

H. SPECIAL HANDLING INFORMATION

☐ ADDITIONAL PAGE(S) ATTACHED

I HEREBY CERTIFY THAT ALL INFORMATION SUBMITTED IN THIS AND ALL ATTACHED DOCUMENTS IS COMPLETE AND ACCURATE, AND THAT ALL KNOWN OR SUSPECTED HAZARDS HAVE BEEN DISCLOSED.

AUTHORIZED SIGNATURE: [signature] TITLE: Consultant DATE: 4/6/89

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ROLLINS ENVIRONMENTAL SERVICES
UNIFORM WASTE DATA SHEET
(SCHEDULE A)

(SHADED AREAS FOR RES USE ONLY)

DOC. NO. _____ RES SALES EXEC: # _____ STREAM NO. BR15504 Update

SAMPLE NO. _____ CONTRACT NO. _____

A. GENERATOR INFORMATION

1. Generator Name: S.M.V. INDUSTRIES, INC.
2. Technical Contact: KIRK ELWOOD PROD.-MAINT MGR. (Title) 3. Phone No. (712) 323-1166
4. Emergency Contact: R. P. BORMAN PRESIDENT (Title) 5. Phone No. (712) 323-0656
6. Generator USEPA I.D.: IAD894566034
7. Generator State I.D.: NONE
8. Disposal State I.D.: NONE

B. PICK UP LOCATION

1. Company Name: S.M.V. INDUSTRIES, INC.
2. Address: 1103 So. 6TH. STREET
3. City: COUNCIL BLUFFS 4. State: IOWA 5. Zip Code: 51501
6. Pickup Contact: KIRK ELWOOD PROD.-MAINT. MGR. (Title) Phone No. (712) 323-1166

C. MANIFEST INFORMATION

1. Company Name: S.M.V. INDUSTRIES, INC.
2. Address: 1026 So. 6TH. STREET
3. City: COUNCIL BLUFFS 4. State: IOWA 5. Zip Code: 51501
6. Manifest Contact: KIRK ELWOOD PROD.-MAINT MGR. (Title) 7. Phone No. (712) 323-1166

D. INVOICE INFORMATION

1. Company Name: WASTE RESEARCH & RECLAMATION CO., INC.
2. Address: ROUTE 7
3. City: EAU CLAIRE 4. State: WI 5. Zip Code: 54701
6. Invoice Contact: HAROLD L. LOEW/SUPERVISOR/ENVIRONMENTAL SERVICES (Title) 7. Phone No. (715)834-9624

E. GENERAL WASTE DESCRIPTION

1. Name of Waste: PAINT RESIDUE FROM CLEANING TANK
2. Process Generating Waste: Removal of excess paint on hooks by heated dip tank.
3. Quantity Generated: 50 gal Per 1 MONTH (Year/Month)

F. SHIPPING INFORMATION

Yes	No		
☑	☐	1. EPA RCRA Hazardous Material	2. EPA Hazardous Waste Number(s): D002, D005, D006, D007, D008
☑	☐	3. Disposal State Regulated Material	
☑	☐	4. DOT Regulated Material	

5. State Waste Number: Generating State: NONE Disposal State: - NONE
6. Proper DOT Shipping Name: CORROSIVE WASTE PAINT RELATED MAT.
7. DOT Hazard Class: CORROSIVE 8. DOT UN/NA No.: NA 1760 9. RQ (lbs)

G. METHOD OF SHIPMENT

1. ☑ Drums: Type/Size: DM / 50gal 2. ☐ Bulk: Type/Size: N/A
3. ☐ Other (Please be specific): 2-3 DRUMS BANDED ON PALLETS
4. ☐ Transportation Requirements: NONE

Stream No. _____

H. REGULATORY COMPLIANCE

Yes	No		Yes	No	
☐	☑	1. OSHA Listed Compounds	☐	☑	7. Benzene
		Specify: _____	☑	☐	8. California List Regulated Waste
☐	☑	2. Radioactive Material	☐	☑	9. Solvent Regulated Waste
☐	☑	3. PCB: ☐ < 50 ppm ☐ 50 - 500 ppm ☐ > 500 ppm	☐	☑	10. Dioxin Regulated Waste (F020, F021, F022, F023, F026, F027, F028)
☐	☑	4. Biomedical Waste	☐	☐	11. First One Third Regulated Waste
☐	☑	5. FIFRA: Pesticides Specific Disposal Requirements	☐	☐	12. Second One Third Regulated Waste
☐	☑	6. Asbestos	☐	☐	13. Third One Third Regulated Waste

I. CHEMICAL COMPOSITION* (must add up to 100%)

1.

Chemical Name	Concentration	Range	CASRN	RQ(LBS.)
WATER BASED ALKALINE SOLUTION	44.6%	45-55%		
PAINT SLUDGE	55.4%	45-65%		
ALKALINE CONCENTRATION - 25 NORMAL				

*PLEASE ATTACH ADDITIONAL SHEETS AS REQUIRED.

J. PROPERTIES OF WASTE

1. Color: Yellowish 2. Odor: pungent
3. Ignitability (Flash Point): > 200 °F
4. Corrosivity pH: 13.10
5. Melting Point: N/A °F
6. Boiling Point: 97 - 100 °C ~~°F~~
7. TOC: _____ mg/l
8. TOX: _____ mg/l
9. Viscosity: _____ CPS @ 25°C
10. Vapor Pressure: _____ mmHg @
11. Bromine: _____ %
12. Iodine: _____ %
13. Fluorine: _____ %
14. Cyanide: _____ %
15. Sulfur: _____ %

	Yes	No
16. Flowable @ 25°C	☑	☐

17. Physical State @ 25°C (68°F):
- ☐ Powder
- ☐ Gas
- ☑ Sludge or Semisolid
- ☑ Liquid
- ☐ Other _____
- ☐ Solid
- _____ % Solid
- ☐ Single Phase
- ☐ Multilayered

18. Heat of Combustion: _____ BTU/lb.
19. Ash: 15.7 %
20. Scrub: _____ lb.NaOH/lb.
21. Specific Gravity/Bulk Density: 1.25
22. Chlorine _____ %

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Stream No. _____

REACTIVE CHARACTERISTICS

Yes	No		Yes	No	
☐	☑	1. Explosive	☐	☑	5. Air Reactive
☐	☑	2. Pyrophoric	☐	☑	6. Reactive Cyanide: _____ %
☐	☑	3. Shock Sensitive	☐	☑	7. Reactive Sulfide _____ %
☐	☑	4. Water Reactive	☐	☑	8. Oxidizer: _____
			☐	☑	9. Other _____

L. ELEMENTAL ANALYSIS (Total Metals required for incinerable waste; TCLP or EpTox Metals required for landfill waste.)

	Total/Units		Total/Units	TCLP or Eptox/ Units
1. Antimony	/	7. Arsenic	/	/
2. Beryllium	/	8. Barium	/	/
3. Copper	/	9. Cadmium	/	/
4. Nickel	/	10. Chromium	/	/
5. Thallium	/	11. Lead	/	/
6. Zinc	/	12. Mercury	/	/
		13. Selenium	/	/
		14. Silver	/	/

Additional Requirements for RES (TX) Inc.:

15. Manganese	/	17. Silicon	/
16. Potassium	/	18. Sodium	/

Additional Requirements for RES (NJ) Inc.:

19. Molybdenum	/	20. Vanadium	/

M. TCLP ORGANICS

_____

_____

N. DISPOSAL CERTIFICATIONS

1. Is this waste excluded from direct land disposal by land disposal regulations that are in effect on the date of this Waste Data Sheet?

   ☐ Yes ☐ No

   If yes, describe which restriction(s) applies to this waste. (See 40CFR268 and 40CFR761.) _____

   _____

2. Under 40CFR268, can this waste be landfilled directly or chemically stabilized and landfilled? ☑ Yes ☐ No

   If yes, completed RES Certification Form must be attached to each Manifest.

3. Under 40CFR268, should this waste be incinerated? ☐ Yes ☑ No

   If yes, completed RES Certification Form must be attached to each manifest.

4. Additional information _____

   _____

   _____

I hereby certify and warrant that the information supplied on this form and on any attachments or supplements represents a complete and accurate identification and description of this waste material, its constituents and its known or suspected hazards. I further certify and warrant that this information is the result of an analysis of a representative sample of the waste obtained and analyzed in accordance with testing procedures of the U.S. Environmental Protection Agency or by the application of knowledge of the process generating the waste materials.

SIGNATURE: Rick Edwards TITLE: Prod. & Maint. Mgr.

DATE: Sept. 11, 1989

PREQUALIFICATION EVALUATION
MATERIAL ANALYSIS

FLUID RECOVERY
SMU INDUSTRIES INC

** FLUID RECOVERY **

GENERAL ANALYSIS OF TOTAL SAMPLE

COLOR	: DARK BROWN
NON-VOLATILE RESIDUE	: 19.2 WT% DESCRIPTION: SLUDGE/OIL
FLAMMABILITY	: NO FLASH AT 142 F BY SETAFLASH
FLAMMABILITY	: NO FLASH AT 102 F BY SETAFLASH
PH	: EXTRACT BY METER 12.5
NEUTRALIZATION	: 3.27 WT% OR 32.7 G/KG ALKALINITY AS NAOH
RADIOACTIVITY	: NONE DETECTED
COMMENTS: KF-AQ=6.4%	

FUEL EVALUATION OF TOTAL SAMPLE

HEAT CONTENT:	7700 BTU/LB		ASH UPON COMBUSTION:	13.8 WT%	
FLUORINE	F :	0.3 WT%	BROMINE	BR: <	0.1 WT%
CHLORINE	CL: <	0.1 WT%	SULFUR	S : <	0.1 WT%

GENERAL COMPOSITION:

	SPECIFIC GRAVITY	VISCOSITY (CENTIPOISE)	GENERAL COMPOSITION BY: APPEARANCE (VOL%)	TOTAL (WT %)
AQUEOUS PHASE (FREE WATER)			10.0	10.0
ORGANIC PHASE (FEEDSTOCK)			0.0	0.0
BOTTOM SLUDGE (SEMISOLIDS)		> 50000 CPS	0.0	0.0
BOTTOM SOLID (SETTLED SOLIDS)			90.0	90.0
TOTAL			100.0	100.0

SPECIFIC COMPOSITION OF TOTAL SAMPLE

	COMPOSITION OF:	TOTAL SAMPLE (WT%)	TOTAL SAMPLE (WT%)
WATER CONTENT		0.0	0.0
NON-VOLATILE RESIDUE	DESCRIPTION: SLUDGE/OIL	19.2	19.2
VOLATILE ORGANICS BY DIFFERENCE		80.8	80.8
TOTAL		100.0	100.0

VOLATILE ORGANIC COMPOSITION OF TOTAL SAMPLE BY GAS CHROMATOGRAPHY

SAMPLE PREPARATION METHODS: CS2-EXTRACT
DETECTION METHODS : FID, FID

COMPOUND NAME	COMPOSITION OF: CODE	CAS NUMBER	VOLATILE ORGANICS (WT%)	VOLATILE ORGANICS (WT%)	TOTAL SAMPLE (WT%)
TOLUENE	TOL	108-88-3	57.9	57.9	46.8
XYLENES (ORTHO-, META-, AND PARA-)	XYLS	95-47-6	19.7	19.7	15.9
MEDIUM-BOILING ALIPHATIC HYDROCARBONS (C9-C13)	MHC	8030-30-6	16.2	16.2	13.1
ETHYLBENZENE	ETB	100-41-4	6.2	6.2	5.0
TOTAL			100.0	100.0	80.8

SUMMARY OF VOLATILE ORGANIC COMPOSITION BY COMPOUND CHEMICAL CLASS WT%:

ALCOHOLS	0.0	ALIPHATIC HYDROCARBONS	16.2
AROMATIC HYDROCARBONS	83.8	CHLORINATED SOLVENTS	0.0
ESTERS	0.0	ETHERS	0.0
GLYCOL ETHERS	0.0	INHIBITORS	0.0
KETONES	0.0	NITROGEN COMPOUNDS	0.0

SPECIFIC ORGANIC COMPOSITION

POLYCHLORINATED BIPHENYLS (PCBS): NONE DETECTED <

LABORATORY REVIEW: A
LEVEL: SEG CODE: RELEASED: 01/22/90
LAB REVIEWERS: CR CR ANALYZED: 01/18/90
WATER CONTENT CANNOT BE MEASURE ACCURATELY

TRACKING INFORMATION:	DATE	FACILITY
SURVEY RECEIVED :	01/11/90	SK TECHNICAL CEN
SAMPLE RECEIVED :	01/11/90	
RESAMPLE SHIPPED :		
RESAMPLE RECEIVED:		

ATTN: Kim

2 of 2

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CUSTOMER INFORMATION:

SMU INDUSTRIES INC
1103 6TH ST
COUNCIL BLUFFS IA 51501

ATTN: KIRK ELWOOD

BILLING ADDRESS:

1026 S. 6TH ST, PO BOX 1094
COUNCIL BLUFFS IA 51501

BRANCH: 512701 CHUCK WEBER COUNTY: POTTOWATTAMI
NATURE OF BUSINESS: MFG FARM PARTS/STEEL FAB
FEDERAL EPA ID: IAD984566034 STATE EPA: . ID:
MANIFEST ADDRESS IS FACILITY MANIFEST TO SAFETY-KLEEN

MATERIAL: PAINT WASTE SLUDGE, WATERFALL BOOTH **PROCESS:** PAINTING
VOLUME: 55 GALS PER QUARTER VOLUME ON HAND: 0
STORAGE CAPACITY: 55 IN DRUMS SHIPPING FREQUENCY: QTR IN DRUMS
COLOR: DK BROWN LAYERS: ONE PHYSICAL STATE: SEMI VISCOSITY: MEDIUM

MATERIAL COMPOSITION(VOL%):	CODE	MIN	MAX	TYPICAL
PAINT	P	0.0		80.0
THINNER	T	0.0		15.0
WATER	W	0.0		5.0

RESTRICTED SUBSTANCES: NONE
D.O.T. HAZARDOUS MATERIAL: CUSTOMER REQUEST ASSISTANCE
EPA HAZARDOUS WASTE: CUSTOMER REQUEST ASSISTANCE

P.O. NO: 449454 BRANCH: 512701 DATE: 01/05/89
TYPE OF SAMPLE: GRAB NUMBER OF DRUMS SAMPLED: 0 TAKEN BY: SALESREP
CONTACT: KIRK ELWOOD TITLE: PROD. MGR PHONE: 712-323-1166

CORPORATE REVIEWS:	DISPOSITION	REVIEWER	DATE
TECHNICAL:	REJECT	CAP	01/22/90
REGULATORY:	REJECT	TAL	01/22/90
OPERATING:	REJECT	CAP	01/23/90

HANDLING CODES: S02/T50 PRICING CODE:

COMMENTS: PH TOO HIGH

2 of 3

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Sent 7-31-90

92666

U.S. POLLUTION CONTROL, INC. HAZARDOUS WASTE PROFILE SHEET

EXHIBIT A TO _____ Contract Dated _____

As prescribed by the Resource Conservation and Recovery Act (Public Law 98-580 Sec. 3004), a detailed chemical and physical analysis must be submitted before we can handle your waste stream. This information is necessary to help us evaluate whether we can safely and economically transport and dispose of your controlled industrial wastes in an environmentally sound manner. Be as complete as possible. If an area is not applicable, mark as such. Should a laboratory analysis be available, please attach it to this form. We can arrange analytical laboratory services, if needed, for an appropriate fee. All information we receive will be held in strictest confidence to protect your interests. SAMPLE WILL NOT BE PROCESSED UNLESS ALL AREAS OF THIS SHEET ARE PROPERLY FILLED IN.

Purchase Order No. _____ Sales Representative Kim Randolph

I. Generator Information

Name of Company SMV Industries ( ) Check if small quantity Generator per CFR-40

Facility Address 1026 So. 6th St. US EPA ID IAD984566034

Council Bluffs, Iowa Invoicing Information Van Waters & Rogers

Mailing Address P.O. Box 1094 3002 F St.

Omaha, Ne 68107

Technical Contact Dick Borman Title _____ Phone (712) 323-0656

General Contact Rick Elwood Title prod. mgr. Phone (712) 323-1166

II. Waste Stream General Information

Waste Name waste paint related Stripper ANTICIPATED VOLUME 12-15 Dr per year X

Process Producing Waste Stripping paint back Color Dark Brown Odor Slight per month _____ per week _____ one time only _____

III. Waste Properties	Layers	Free Liquids			
Physical State @ 25°C	(✓) Single Phase	(✓) Yes	pH 12.5	Normality _____	(✓) Organic
(✓) Liquid ( ) Powder	( ) Bi-layered	( ) No	Type Acid _____	Type _____	( ) Inorganic
( ) Solid (✓) Sludge	( ) Multi-layered		Density _____	Caustic _____	Flash Point >100°F

Chemical Composition (✓) % ( ) PPM

(List all known)	Range Lower	Upper
Toluene	(25	(70
Xylene	(5)	(25
Aliphatic Hydrocarbons	(25)	
Ethyl benzene	(1)	(10)
Sludge (paint chips)	20	70
_____	( )	( )
_____	( )	( )

Metals-EP Tox Test Mg/l or PPM N/A

Arsenic (As)	( )	Lead (Pb)	( )	Nickel (Ni)	( )
Barium (Ba)	( )	Vanadium (V)	( )	Zinc (Zn)	( )
Cadmium (Cd)	( )	Selinium (Se)	( )	Thallium (Tl)	( )
Chromium (Cr)	( )	Silver (Ag)	( )	Cobalt (Co)	( )
Mercury (Hg)	( )	Copper (Cu)	( )		

Possible Component (include unit of measure) N/A

Cyanides _____	2, 4, D _____	Dioxin _____
Sulfides _____	Phenolics _____	Organic Chlorides _____

IV. PCB Oil: Type _____ Concentration % _____ % ppm N/A

PCB Solids: Type _____ Concentration % _____ % ppm _____

PCB Equip: Type _____ Concentration % _____ % ppm _____

Has equipment been drained and flushed according to 40 CFR Part 761? _____

Attach information for dimensions, weight and nameplate capacity for all equipment

V. Hazardous Characteristics (From CFR-40)

U.S. EPA Hazardous Code(s) F003, F005

Is the waste N/A ( ) Pyrophoric ( ) Infectious ( ) Water reactive ( ) Radioactive ( ) Pathogenic

( ) Explosive ( ) Pesticides/Herbicides ( ) Biological ( ) Shock sensitive ( ) Etiological

VI. Shipping Information (From CFR-49)

Proper DOT Shipping Name RQ waste Flammable Liquid N.O.S. (Toluene Paint)

DOT Hazard Class Flammable Liquid UN/NA Number 1993 Reportable Quantity Y.E.S.

Method of Shipment ( ) Bulk Liquids ( ) Bulk Solids

(X) Drums ( ) Other

Special Handling and Safety Instructions See attached analysis

I certify and warrant that the above information, the information attached, and the waste stream as described is true and correct to the best of my knowledge and ability and not willful or deliberate omissions exist and that all known and/or suspected hazards have been disclosed, and a sample representative of the waste stream has been or is being sent to the proper facility. Further, I certify the samples have been collected using [illegible]

4-26

WASTE SAMPLE ANALYSIS USPCI/HYDROCARBON RECOVERY SERVICES

2549 New York
Wichita, Kansas 67219
(316) 267-5742

Detailed Analysis X
Confirmation Analysis ___

HWPS# 92666
Generator SMV Industries Code# 903599 Date Received 8-1-90
Address 1026 So. 6th St. P.O. Box 1094 Phone # ___
City/State Council Bluffs, Iowa Zip Code ___ Contact ___
Sample Labeled as Waste Paint Related Stripper Pickup Date ___
Manifest Document # ___

PHYSICAL/VISUAL ANALYSIS OF WASTE SAMPLE

Color Dark Brown Phase: Unilayer ___ Bilayer X Multilayer ___
Odor Toluene Water ___% Solvent 95 % Solids 5 %

RCRA HAZARDOUS WASTE DETERMINATION

Ignitability: Flashpoint ___ °F/°C
Corrosivity: pH ___
Reactivity: ___

EP Toxicity (ppm.)
Barium ___
Cadmium ___
Chromium ___
Lead ___

TCLP (ppm.)
Acetone ___
MEK ___
Toluene ___
Xylene ___

ANALYSIS PER DISPOSAL METHOD

KILN FUEL OR DISTILLATION

Gas Chromatograph: % Solvent

No F-listed solvents detected

Energy Content 0 BTU/lb.
Halogen ___ % by weight
Halogen (Bielstein) ___ 1000 ppm.
pH ___ Specific Gravity ___
PCB's ___ ppm. Compatibility ___

INCINERATION OR HAZARDOUS WASTE LANDFILL

Total Organic Solvent Content [sniffer] (ppm.) >200
Ignitability (+ or -)/Flashpoint (°F/°C) >140°
Halogen [Bielstein] Neg. 1000 ppm. Corrosivity: pH 9
Specific Gravity 1.075 Compatibility OK

WASTE WATER, COOLANTS, AND OIL

Flashpoint ___ °F/°C Corrosivity: pH ___ BS&W ___ %
Total Organic Solvent Content [sniffer] (ppm.) ___
Halogen [Bielstein] ___ 1000 ppm. Specific Gravity ___
PCB (oil)(ppm.) ___ Compatibility ___
Total Heavy Metals (ppm.):
Barium ___ Chromium ___
Cadmium ___ Lead ___

Comments: No BTU Value

Chemist: Bruce Bogenrief Date 9-17-90 Approval: Bruce Bogenrief Date 10-9-90 BMK

RECOMMENDATION: Distillation ___ Incineration X H. W. Landfill ___ Water/Oil ___
Kiln Fuel (Chlorinated, Hot Room, Dry Solids) ___

COPIES: Generator, Operator, Chemist, File (original) 8/90

UNOCAL 76

MATERIAL SAFETY DATA SHEET

Unocal Corporation
1201 West 5th Street
Los Angeles, California 90017

1. CHEMICAL PRODUCT AND COMPANY IDENTIFICATION

Product Name: Xylene (XYLOL)
Product Code: 11420
Synonyms: Xylol
Dimethyl Benzene
Generic Name: Volatile solvent
Chemical Family: Aromatic hydrocarbon

Responsible Party: Unocal Petroleum Products and Chemicals Div.
Union Oil Company of California
Hydrocarbon Sales
1701 Golf Road Suite 1-1101
Rolling Meadows, Illinois
60008-4295

For further information contact
8am - 4pm CST, Mon - Fri: 1-800-967-7601

EMERGENCY OVERVIEW

24 Hour Emergency Telephone Numbers:

For Chemical Emergencies:	Health Emergencies for Unocal/UNO-VEN Products:
Spill, Leak, Fire or Accident	Los Angeles Poison
Call CHEMTREC - Day or Night	Information Center
(800)424-9300	Cont. US: (800)356-3129
AK, HI (202)483-7616 (collect)	Outside US: (213)222-3212

Health Hazards: Causes eye and skin irritation. Aspiration hazard if swallowed. Can enter lungs and cause damage. Keep container tightly closed. Use with adequate ventilation. Avoid contact with eyes, skin and clothing. Do not taste or swallow. Wash thoroughly after handling.

Physical Hazards: Flammable liquid and vapor. Keep away from heat, sparks, flames, or other sources of ignition (e.g., static electricity, pilot lights, mechanical/electrical equipment).

- Physical Form: Liquid
- Appearance: Clear Colorless
- Odor: Light Aromatic

NFPA HAZARD CLASS: Health: 2 (Moderate)
Flammability: 3 (High)
Reactivity: 0 (Least)

2. COMPOSITION/INFORMATION ON INGREDIENTS

HAZARDOUS COMPONENTS	EXPOSURE GUIDELINE		
	Limits	Agency	Type
Xylenes	100 ppm	OSHA	TWA
CAS# 1330-20-7	150 ppm	OSHA	STEL
	100 ppm	MSHA	TWA
	100 ppm	Cal.OSHA	TWA-SKIN
	300 ppm	Cal.OSHA	CEIL-SKIN
Ethyl Benzene	100 ppm	ACGIH	TWA
CAS# 100-41-4	125 ppm	ACGIH	STEL
	100 ppm	OSHA	TWA
	125 ppm	OSHA	STEL
	100 ppm	MSHA	TWA
	100 ppm	Cal.OSHA	TWA

Note: Most OSHA exposure limits shown above are 1989 PEL's vacated by the U.S. Court of Appeals. These are included as guideline information. Enforceable limits may be less stringent or are not established.

3. HAZARDS IDENTIFICATION

POTENTIAL HEALTH EFFECTS:

Eye: Eye irritant. Contact may cause stinging, watering, redness, and swelling.

Skin: Skin irritant. Contact may cause redness, burning, drying and cracking of the skin, and skin damage. Contact may result in skin absorption but symptoms of toxicity are not anticipated by this route alone under normal conditions of use.

Inhalation (Breathing): Low to moderate degree of toxicity by inhalation.

M A T E R I A L S A F E T Y D A T A S H E E T

***** I IDENTIFICATION *****

MANUFACTURED BY: Vogel Paint & Wax Co., Inc.
Industrial Air Park
Orange City, Iowa 51041

REVISED: 01-MAY-92

EMERGENCY TELEPHONE # : 712-737-4993

INFORMATION TELEPHONE # : 712-737-4993

MFG. PRODUCT NUMBER: IB-2611
FORMERLY: LX-9822-I

PROPER SHIPPING NAME: PAINT

TRADE NAME: PHILLIPS MFG. ALUMINUM L/F R/V

***** II HAZARDOUS INGREDIENTS *****

				ACGIH		OSHA				
MSG	INGREDIENT	CAS #	WT.%	TLV	STEL	PEL	CEILING	PEAK	LEL%	VAPOR PRESSURE
(1)	Mineral Spirits	64741-41-9	(5	100 PPM		500 PPM			.7	2.0 mm
(1)	Xylene	1330-20-7	20	100 PPM	150 PPM	100 PPM	200 PPM		1.0	9.5 mm
(1)	Toluene	108-88-3	45	100 PPM	150 PPM	200 PPM	300 PPM	500 PPM	1.3	23.0 mm

WARNING MESSAGES:
(1) Reports have associated repeated and prolonged occupational overexposure to solvents with permanent brain and nervous system damage. Intentional misuse by deliberately concentrating and inhaling the contents may be harmful or fatal. Chronic exposure may cause damage to the central nervous system, respiratory system, lung, eye, skin, liver, gastrointestinal tract, spleen, kidneys, and blood.

***** III PHYSICAL DATA *****

BOILING RANGE: 230-380 degrees F.

EVAPORATION RATE: *slower than ether*

PERCENT VOLATILE BY VOLUME: 72.81%

WEIGHT PER GALLON: 8.00 LBS

VAPOR DENSITY: * heavier than air *

***** IV FIRE AND EXPLOSION HAZARD DATA *****

FLASH POINT: 7 degrees C. 45 degrees F.

LEL: Refer to Section II

FLAMMABILITY CLASSIFICATION: CLASS 1B

DOT CLASSIFICATION (HAZARD CLASS): *flammable liquid*

EXTINGUISHING MEDIA: *carbon dioxide, dry chemical, fire foam, or dry sand*

UNUSUAL FIRE AND EXPLOSION HAZARDS: keep away from heat, sparks, and flame.

SPECIAL FIRE FIGHTING PROCEDURES: Do not use water. It will react with the aluminum to form combustible hydrogen gas.

If the solvent has burned away and the fire is burning aluminum - use dry sand. Do not use carbon tetrachloride as a fire extinguisher. It reacts with aluminum. Apply sand witth utmost care and avoid disturbing the burning material.

***** V HEALTH HAZARD DATA *****

THRESHOLD LIMIT VALUE: See Section II.

EFFECTS OF OVEREXPOSURE:
ACUTE: Inhalation of vapors could cause respiratory irritation. Liquid could irritate or damage eyes.
CHRONIC: None recognized.

MEDICAL CONDITIONS PRONE TO AGGRAVATION BY EXPOSURE: consult physician

PRIMARY ROUTE(S) OF ENTRY: skin and inhalation

EMERGENCY AND FIRST AID PROCEDURES:
INHALATION: Remove to fresh air. Restore breathing. Treat symptomatically. Consult a physician.
EYES: Flush immediately with large amounts of water for at least 15 minutes. Take to a physician for medical treatment.
SKIN: Wipe off with towel. Remove remainder with mineral spirits, turpentine, or lacquer thinner. Wash with soap and water. Remove contaminated clothing.

MATERIAL SAFETY DATA SHEET

***** I IDENTIFICATION *****

MANUFACTURED BY: Vogel Paint & Wax Co., Inc.
Industrial Air Park
Orange City, Iowa 51041

REVISED: 03-MAR-88

EMERGENCY TELEPHONE # : 712-737-4993 INFORMATION TELEPHONE # : 712-737-4993

MFG. PRODUCT NUMBER: IK-2501
FORMERLY: I-2701

PROPER SHIPPING NAME: PAINT

TRADE NAME: INDUSTRIAL ALUMINUM RUST INHIB.

***** II HAZARDOUS INGREDIENTS *****

				ACGIH		OSHA				VAPOR
MSG	INGREDIENT	CAS #	WT.%	TLV	STEL	PEL	CEILING	PEAK	LEL%	PRESSURE
(1)	V M & P	64742-89-8	35	300 PPM	400 PPM	350 PPM	1800 PPM		1.1	30.0 mm
(1)	Mineral Spirits	64741-41-9	5	100 PPM		500 PPM			.7	2.0 mm
(1)	Xylene	1330-20-7	10	100 PPM	150 PPM	100 PPM	200 PPM		1.0	9.5 mm

WARNING MESSAGES:

(1) Reports have associated repeated and prolonged occupational overexposure to solvents with permanent brain and nervous system damage. Intentional misuse by deliberately concentrating and inhaling the contents may be harmful or fatal. Chronic exposure may cause damage to the central nervous system, respiratory system, lung, eye, skin, liver, gastrointestinal tract, spleen, kidneys, and blood.

***** III PHYSICAL DATA *****

BOILING RANGE: 244-380 degrees F. EVAPORATION RATE: *slower than ether*

PERCENT VOLATILE BY VOLUME: 64.58% WEIGHT PER GALLON: 7.79 LBS

VAPOR DENSITY: * heavier than air *

***** IV FIRE AND EXPLOSION HAZARD DATA *****

FLASH POINT: 11.5 degrees C. 53 degrees F. LFL: Refer to Section II

FLAMMABILITY CLASSIFICATION: CLASS 1B

DOT CLASSIFICATION (HAZARD CLASS): *flammable liquid*

EXTINGUISHING MEDIA: *carbon dioxide, dry chemical, fire foam, or dry sand*

UNUSUAL FIRE AND EXPLOSION HAZARDS: keep away from heat, sparks, and flame.

SPECIAL FIRE FIGHTING PROCEDURES: Do not use water. It will react with the aluminum to form combustible hydrogen gas.

If the solvent has burned away and the fire is burning aluminum - use dry sand. Do not use carbon tetrachloride as a fire extinguisher. It reacts with aluminum. Apply sand witth utmost care and avoid disturbing the burning material.

***** V HEALTH HAZARD DATA *****

THRESHOLD LIMIT VALUE: See Section II.

EFFECTS OF OVEREXPOSURE:
ACUTE: Inhalation of vapors could cause respiratory irritation. Liquid could irritate or damage eyes.
CHRONIC: None recognized.

MEDICAL CONDITIONS PRONE TO AGGRAVATION BY EXPOSURE: consult physician

PRIMARY ROUTE(S) OF ENTRY: skin and inhalation

EMERGENCY AND FIRST AID PROCEDURES:
INHALATION: Remove to fresh air. Restore breathing. Treat symptomatically. Consult a physician.
EYES: Flush immediately with large amounts of water for at least 15 minutes. Take to a physician for medical treatment.
SKIN: Wipe off with towel. Remove remainder with mineral spirits, turpentine, or lacquer thinner. Wash with soap and water. Remove contaminated clothing.

MATERIAL SAFETY DATA SHEET

***** I IDENTIFICATION *****

MANUFACTURED BY: Vogel Paint & Wax Co., Inc.
Industrial Air Park
Orange City, Iowa 51041

REVISED: 24-MAR-88

EMERGENCY TELEPHONE # : 712-737-4993 INFORMATION TELEPHONE # : 712-737-4993

MFG. PRODUCT NUMBER: IB-4603
FORMERLY: I-4603

PROPER SHIPPING NAME: PAINT

TRADE NAME: FAST DRYING AC ORANGE

***** II HAZARDOUS INGREDIENTS *****

				ACGIH		OSHA				VAPOR
MSG	INGREDIENT	CAS #	WT.%	TLV	STEL	PEL	CEILING	PEAK	LEL%	PRESSURE
(1)	V M & P	64742-89-8	15	300 PPM	400 PPM	350 PPM	1800 PPM		1.1	30.0 mm
(1)	Mineral Spirits	64741-41-9	< 5	100 PPM		500 PPM			.7	2.0 mm
(1)	Xylene	1330-20-7	25	100 PPM	150 PPM	100 PPM	200 PPM		1.0	9.5 mm
(1)	D-100	64742-95-6	5	100 PPM	150 PPM	100 PPM			1.0	4.4 mm
(2)	Lead Chromate	1344-37-2	< 5	.05 MG/M3						
(2)	Lead Chromate/Lead Molybdate	12646-85-8	15	.05 MG/M3						

WARNING MESSAGES:

(1) Reports have associated repeated and prolonged occupational overexposure to solvents with permanent brain and nervous system damage. Intentional misuse by deliberately concentrating and inhaling the contents may be harmful or fatal. Chronic exposure may cause damage to the central nervous system, respiratory system, lung, eye, skin, liver, gastrointestinal tract, spleen, kidneys, and blood.

(2) According to OSHA lead standard reports, lead may impair the reproductive systems of men and women, damage may also be caused to unborn fetuses. Lead chromate is also under surveillance for the potential to cause lung cancer and is listed by the National Toxicology Program 1983 Annual Report on Carcinogens and the ACGIH, 1983-84 list of Industrial Substances Suspect of Carcinogenic Potential for Man.

***** III PHYSICAL DATA *****

BOILING RANGE: 244-380 degrees F. EVAPORATION RATE: *slower than ether*

PERCENT VOLATILE BY VOLUME: 65.83% WEIGHT PER GALLON: 9.13 LBS

VAPOR DENSITY: * heavier than air *

***** IV FIRE AND EXPLOSION HAZARD DATA *****

FLASH POINT: 19 degrees C. 66 degrees F. LEL: Refer to Section II

FLAMMABILITY CLASSIFICATION: CLASS 1B

DOT CLASSIFICATION (HAZARD CLASS): *flammable liquid*

EXTINGUISHING MEDIA: *carbon dioxide, dry chemical, or fire foam*

UNUSUAL FIRE AND EXPLOSION HAZARDS: keep away from heat, sparks, and flame.

SPECIAL FIRE FIGHTING PROCEDURES: Water is unsuitable, but may be used to cool closed containers.

***** V HEALTH HAZARD DATA *****

THRESHOLD LIMIT VALUE: See Section II.

EFFECTS OF OVEREXPOSURE:

ACUTE: Inhalation of vapors could cause respiratory irritation. Liquid could irritate or damage eyes.

CHRONIC: Prolonged or repeated exposure, such as from poor hygiene, housekeeping or handling practices, can result in lead poisoning. Early symptoms are fatigue, disturbance of sleep, and constipation with more severe exposure followed by colic, anemia and neuritis (nerve inflammation). Prolonged overexposure can severely damage red blood cell formation, kidneys and nervous system. Other symptoms include loss of appetite, metallic taste in mouth, anxiety, nausea, pallor, headache, irritability, muscle and joint pain, tremors, numbness, dizziness, and hypertension.

M A T E R I A L S A F E T Y D A T A S H E E T

***** I IDENTIFICATION *****

MANUFACTURED BY: Vogel Paint & Wax Co., Inc.
Industrial Air Park
Orange City, Iowa 51041

REVISED: 22-AUG-90

EMERGENCY TELEPHONE # : 712-737-4993

INFORMATION TELEPHONE # : 712-737-4993

MFG. PRODUCT NUMBER: IB-4620
FORMERLY: LX-8974-C

PROPER SHIPPING NAME: PAINT

TRADE NAME: SMV INDUSTRIES ORANGE ENAMEL L/F

***** II HAZARDOUS INGREDIENTS *****

				ACGIH		OSHA				VAPOR
MSG	INGREDIENT	CAS #	WT.%	TLV	STEL	PEL	CEILING	PEAK	LEL%	PRESSURE
(	Odorless Spirits	64741-65-7	(.5	200 PPM					.9	0.5
(	V M & P	64742-89-8	45	300 PPM	400 PPM	350 PPM	1800 PPM		1.1	30.0
(1)	Mineral Spirits	64741-41-9	(5	100 PPM		500 PPM			.7	2.0
(1)	Xylene	1330-20-7	(.5	100 PPM	150 PPM	100 PPM	200 PPM		1.0	9.5
(1)	Toluene	108-88-3	(5	100 PPM	150 PPM	200 PPM	300 PPM	500 PPM	1.3	23.0
(	D-150	64742-94-5	5	100 PPM					.9	1.3
(	Methanol	67-56-1	(.5	200 PPM	250 PPM	200 PPM			6.0	96

WARNING MESSAGES:
(1) Reports have associated repeated and prolonged occupational overexposure to solvents with permanent brain and nervous system damage. Intentional misuse by deliberately concentrating and inhaling the contents may be harmful or fatal. Chronic exposure may cause damage to the central nervous system, respiratory system, lung, eye, skin, liver, gastrointestinal tract, spleen, kidneys, and blood.

***** III PHYSICAL DATA *****

BOILING RANGE: 147-400 degrees F. EVAPORATION RATE: *slower than ether*

PERCENT VOLATILE BY VOLUME: 70.55% WEIGHT PER GALLON: 7.76 LBS

VAPOR DENSITY: * heavier than air *

***** IV FIRE AND EXPLOSION HAZARD DATA *****

FLASH POINT: 10 degrees C. 50 degrees F. LEL: Refer to Section II

FLAMMABILITY CLASSIFICATION: CLASS 1B

DOT CLASSIFICATION (HAZARD CLASS): *flammable liquid*

EXTINGUISHING MEDIA: *carbon dioxide, dry chemical, or fire foam*

UNUSUAL FIRE AND EXPLOSION HAZARDS: keep away from heat, sparks, and flame.

SPECIAL FIRE FIGHTING PROCEDURES: Water is unsuitable, but may be used to cool closed containers.

***** V HEALTH HAZARD DATA *****

THRESHOLD LIMIT VALUE: See Section II.

EFFECTS OF OVEREXPOSURE:
ACUTE: Inhalation of vapors could cause respiratory irritation. Liquid could irritate or damage eyes.
CHRONIC: None recognized.

MEDICAL CONDITIONS PRONE TO AGGRAVATION BY EXPOSURE: consult physician

PRIMARY ROUTE(S) OF ENTRY: skin and inhalation

EMERGENCY AND FIRST AID PROCEDURES:
INHALATION: Remove to fresh air. Restore breathing. Treat symptomatically. Consult a physician.
EYES: Flush immediately with large amounts of water for at least 15 minutes. Take to a physician for medical treatment.
SKIN: Wipe off with towel. Remove remainder with mineral spirits, turpentine, or lacquer thinner. Wash with soap and water. Remove contaminated clothing.

LORD Chemicals Division

MATERIAL SAFETY DATA SHEET

HMIS RATING
Health - 2*
Flammability - 3
Reactivity - 0
*See reference to chronic effects, Section V

DATE	REV	MSDS NUMBER	COMPILED BY	APPROVED BY
08/19/85	01/10/91	EA 15	KBM	J. A. Misterovich

PRODUCT IDENTIFICATION	PRODUCT CLASS
CHEMLOK 205	Elastomer Adhesive

SECTION I

MANUFACTURER'S NAME: Lord Corporation
Chemical Products Group
STREET ADDRESS: 2000 West Grandview Blvd
P. O. Box 10038
CITY, STATE AND ZIP CODE: Erie PA 16514-0038

EMERGENCY TELEPHONE NO.: 814-763-2345 (State "EMERGENCY" - Ask for "Safety Engineer")
INFORMATION TELEPHONE NO.: 814-868-3611 (Ask for "Regulatory Compliance")

SECTION II - HAZARDOUS INGREDIENTS

INGREDIENT			PERCENT	OCCUPATIONAL	LEL	VAPOR PRESSURE
Chemical Name	Common Name	CAS Number	(Wt.)	EXPOSURE LIMITS	(% by Vol)	(mm Hg)
**Methyl Isobutyl Ketone	Hexone MIBK	108-10-1	59	50 ppm 205 mg/m^3 (TWA-ACGIH & OSHA) 75 ppm 300 mg/m^3 (STEL-ACGIH & OSHA)	1.4	15/20°C
**Xylene	Xylol	1330-20-7	13	100 ppm 435mg/m^3 (TWA-ACGIH & OSHA) 150 ppm 655 mg/m^3 (STEL-ACGIH & OSHA)	1.1	9/20°C
**Methyl Ethyl Ketone	MEK 2-Butanone	78-93-3	2	200 ppm 590 mg/m^3 (TWA-ACGIH & OSHA) 300 ppm 885 mg/m^3 (STEL-ACGIH & OSHA)	2.0	70/20°C
Ethyl Alcohol	Ethanol	64-17-5	< 1	1900 mg/m^3 1000 ppm (TWA-ACGIH & OSHA)	3.3	44/20°C
Carbon Black		1333-86-4	< 1	3.5 mg/m^3 (TWA-ACGIH & OSHA)	Not Applicable	Not Applicable
Titanium Dioxide	TiO_2	13463-67-7	5	10 mg/m^3 total dust (TWA-ACGIH & OSHA) 5 mg/m^3 respirable dust (TWA-OSHA)	Not Applicable	Not Applicable
**Zinc Oxide		1314-13-2	< 1	10 mg/m^3 of total dust (TWA-ACGIH & OSHA) 5 mg/m^3 of respirable dust (TWA-OSHA)	Not Applicable	Not Applicable
Silica, amorphous fumed		112945-52-5	2	10 mg/m^3 (TWA-ACGIH)	Not Applicable	Not Applicable

SI10-8000-1

SECTION II - HAZARDOUS INGREDIENTS

INGREDIENT Chemical Name	Common Name	CAS Number	PERCENT (Wt.)	OCCUPATIONAL EXPOSURE LIMITS	LEL (% by Vol)	VAPOR PRESSURE (mm Hg)
**Carbon Tetrachloride[1]		56-23-5	≤ 0.08	5 ppm 30 mg/m^3 (TWA-ACGIH) (A2-ACGIH Susp. Human Carcinogen) 2 ppm 126 mg/m^3 (TWA-OSHA)	Not Applicable	90.99/20°C
1,-Methoxy-2-Propanol		107-98-2	< 1	Not Established	Not Available	Not Available

[1] See Section V for chronic hazard information.

** Ingredients denoted by (**) in Section II are toxic chemicals and are subject to reporting requirements of Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA) and 40 CFR Part 373.

SECTION III - PHYSICAL DATA

BOILING RANGE: 165-292°F 74-144°C VAPOR DENSITY: x Heavier than Air ___ Lighter than Air

EVAPORATION RATE: ___ Faster x Slower, than Ether PERCENT VOLATILE BY VOLUME: 85

SOLUBLE IN WATER: ___ Yes x No WEIGHT PER GALLON: 7.8

APPEARANCE AND ODOR: Gray liquid, solvent odor pH: Not Applicable

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLAMMABILITY CLASSIFICATION: OSHA Flammable Liquid - Class IB DOT Flammable Liquid

FLASH POINT: 66°F 14°C LEL: 1.1 UN 1133 Adhesive, Flammable

EXTINGUISHING MEDIA: x Foam x Alcohol Foam x CO_2 x Dry Chemical ___ Water Fog x Halon 1211

UNUSUAL FIRE AND EXPLOSION HAZARDS: Keep containers tightly closed. Isolate from heat, electrical equipment, sparks, open flame and other sources of ignition. Water may be used to cool closed containers to prevent pressure buildup and possible auto ignition or explosion.

DECOMPOSITION PRODUCTS: Cl_2, HCl, phosgene, carbon dioxide, carbon monoxide.

SPECIAL FIRE FIGHTING PROCEDURES: Use full protective clothing and equipment, including self-contained breathing apparatus. If water is used, fog nozzles are preferrable.

HMIS RATING
Health - 2*
Flammability - 3
Reactivity - 0
*See reference to chronic effects, Section V

DATE	REV	MSDS NUMBER	COMPILED BY	APPROVED BY
03/01/87	01/11/91	EA 63	DLO	J. A. Misterovich

PRODUCT IDENTIFICATION	PRODUCT CLASS
CHEMLOK 220	Adhesives, Elastomer

SECTION I

MANUFACTURER'S NAME: Lord Corporation
Chemical Products Group
STREET ADDRESS: 2000 West Grandview Blvd
P. O. Box 10038
CITY, STATE AND ZIP CODE: Erie PA 16514-0038

EMERGENCY TELEPHONE NO.: 814-763-2345 (State "EMERGENCY" - Ask for "Safety Engineer")
INFORMATION TELEPHONE NO.: 814-868-3611 (Ask for "Regulatory Compliance")

SECTION II - HAZARDOUS INGREDIENTS

INGREDIENT Chemical Name	Common Name	CAS Number	PERCENT (Wt.)	OCCUPATIONAL EXPOSURE LIMITS	LEL (% by Vol)	VAPOR PRESSURE (mm Hg)
**Xylene	Xylol	1330-20-7	60	100 ppm 435mg/m^3 (TWA-ACGIH & OSHA) 150 ppm 655 mg/m^3 (STEL-ACGIH & OSHA)	1.1	9/20°C
**Tetrachloro ethylene[1]	Perc	127-18-4	15	50 ppm 335 mg/m^3 (TWA-ACGIH) 25 ppm 170 mg/m^3 (TWA-OSHA) 200 ppm 1340 mg/m^3 (STEL-ACGIH)	Not Applicable	14/20°C
Carbon Black		1333-86-4	< 5	3.5 mg/m^3 (TWA-ACGIH & OSHA)	Not Applicable	Not Applicable
**Inorganic Lead Salt*		7439-92-1	< 2	0.15 mg/m^3 (TWA-ACGIH) 0.05 mg/m^3 (TWA-OSHA)	Not Applicable	Not Applicable
**Carbon Tetrachloride[1]		56-23-5	≤ 0.14	5 ppm 30 mg/m^3 (TWA-ACGIH) (A2-ACGIH Susp. Human Carcinogen) 2 ppm 126 mg/m^3 (TWA-OSHA)	Not Applicable	90.99/20°C

[1] See Section V for chronic hazard information.
*Exact identity withheld as a trade secret.
** Ingredients denoted by (**) in Section II are toxic chemicals and are subject to reporting requirements of Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA) and 40 CFR Part 373.

SI10-8000-1

SECTION III - PHYSICAL DATA

BOILING RANGE: 250-292°F 121-144°C VAPOR DENSITY: x Heavier than Air ___ Lighter than Air

EVAPORATION RATE: ___ Faster x Slower, than Ether PERCENT VOLATILE BY VOLUME: 80

SOLUBLE IN WATER: ___ Yes x No WEIGHT PER GALLON: 8.9

APPEARANCE AND ODOR: Black liquid,. solvent odor pH: Not Applicable

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLAMMABILITY CLASSIFICATION: OSHA Flammable Liquid - Class IC DOT Flammable Liquid

FLASH POINT: 83°F 28°C LEL: 1.1 UN 1133 Adhesive, Flammable

EXTINGUISHING MEDIA: x Foam x Alcohol Foam x CO_2 x Dry Chemical ___ Water Fog x Halon 1211

UNUSUAL FIRE AND EXPLOSION HAZARDS: Keep containers tightly closed. Isolate from heat, electrical equipment, sparks, open flame and other sources of ignition. Water may be used to cool closed containers to prevent pressure buildup and possible auto ignition or explosion.

DECOMPOSITION PRODUCTS: Br_2, Cl_2, HBr, HCl, phosgene, carbon monoxide, carbon dioxide, oxides of nitrogen.

SPECIAL FIRE FIGHTING PROCEDURES: Use full protective clothing and equipment, including self-contained breathing apparatus. If water is used, fog nozzles are preferrable.

SECTION V - HEALTH HAZARD DATA

EFFECTS OF OVEREXPOSURE:

ACUTE (Short Term): Possible irritation of respiratory system causing a variety of symptoms such as dryness of the throat, tightness of the chest, and shortness of breath. Anesthetic. Respiratory irritant. Skin irritant. Eye irritant. May cause central nervous system depression characterized by the following progressive steps: headache, dizziness, staggering gait, confusion, unconsciousness or coma. May cause headache and nausea.

CHRONIC (Long Term): May cause dermatitis. May cause liver or kidney damage. Repeated or prolonged solvent overexposure may result in permanent central nervous system damage. NTP reports limited evidence that tetrachlorethylene is carcinogenic in mice by oral administration. IARC classifies tetrachloroethylene as a Group 2B carcinogen - evidence inadequate in humans, sufficient evidence in animals. This product contains a very small quantity of carbon tetrachloride which has been identified by NTP and IARC as -- sufficient evidence for carcinogenicity in experimental animals; inadequte evidence in humans. Overexposure to inorganic lead which is present in this product can affect the central and peripheral nervous systems, the urinary, gastrointestinal, blood forming, and reproductive systems. Use of this product should comply with 29 CFR 1910.1025 - OSHA Lead Standard. May affect the gastrointestinal system. May affect the blood and blood forming organs.

MEDICAL CONDITIONS PRONE TO AGGRAVATION BY EXPOSURE: Respiratory allergies. Chronic diseases of the skin. Chronic diseases of the nose, throat and respiratory tract. Chronic diseases of the central nervous system. Chronic diseases of the liver or kidney. Chronic diseases of the blood or blood forming organs. Chronic diseases of the gastrointestinal tract.

PRIMARY ROUTES OF ENTRY: x Dermal x Inhalation x Ingestion

EMERGENCY AND FIRST AID PROCEDURES: INHALATION: Move person to fresh air. Restore breathing by artificial resuscitation, if necessary. Treat symptomatically. Consult a physician. SPLASH (EYES): Flush eyes immediately with large amounts of water for at least 15 minutes, holding eyelids open while flushing. Take to a physician for medical treatment. SPLASH (SKIN): Flush contaminated skin and clothing with large amounts of water. Remove contaminated clothing. Wash affected skin areas with soap and water. Consult a physician if irritation persists. INGESTION: Drink one or two glasses of water or milk to dilute. Do not induce vomiting. Consult physician or poison control center immediately. Treat symptomatically.

Date Issued: 10/22/91
Supercedes: 03/12/91

TEXACO
MATERIAL SAFETY DATA SHEET

NOTE: Read and understand Material Safety Data Sheet before handling or disposing of product

1. CHEMICAL PRODUCT AND COMPANY IDENTIFICATION

MATERIAL IDENTITY

Product Code and Name:
70309 TOLUENE (Toluol)

Chemical Name and/or Family or Description:
Aromatic Hydrocarbon

Manufacturer's Name and Address:
Texaco Chemical Company
P.O. Box 27707 Houston, TX 77227

Telephone Numbers:
TRANSPORTATION EMERGENCY Company: (409) 727-0831 CHEMTREC: (800) 424-9300
HEALTH EMERGENCY Company: (914) 831-3400
GENERAL MSDS ASSISTANCE (914) 838-7204
TECHNICAL INFORMATION Fuels: (914) 838-7336; Lubricants/Antifreezes: (914) 838-7509
Chemicals: (512) 459-6543

2. COMPOSITION/INFORMATION ON INGREDIENTS

Product and/or Component(s) Carcinogenic According to:	OSHA	IARC	NTP	OTHER	NONE
	-	-	-	-	X

Composition:

Chemical/Common Name	CAS No.	Exposure Limit	Range in %
* Toluene	108883	100ppm TWA-OSHA 150ppm STEL-OSHA 100ppm TWA-ACGIH 150ppm STEL-ACGIH	100.00
* Benzene	71432	1 ppm TWA OSHA 10ppm TWA ACGIH 5 ppm STEL OSHA	0.01 - 0.09

Product is hazardous according to OSHA (1910.1200).
* Component(s) is hazardous according to OSHA or one or more state Right-to-Know laws.

3. HAZARD IDENTIFICATION

EMERGENCY OVERVIEW

Appearance and Odor: clear liquid, aromatic type odor

WARNING STATEMENT

WARNING! FLAMMABLE LIQUID AND VAPOR
HARMFUL IF INHALED OR ABSORBED THROUGH SKIN
MAY CAUSE DIZZINESS AND DROWSINESS
MAY CAUSE DAMAGE TO LIVER, KIDNEY, AND NERVOUS SYSTEM
MAY CAUSE EYE AND SKIN IRRITATION
ASPIRATION HAZARD IF SWALLOWED -- CAN ENTER LUNGS AND CAUSE DAMAGE

HMIS				NFPA			
Health:	2	Reactivity:	0	Health:	2	Reactivity:	0
Flammability:	3	Special:	-	Flammability:	3	Special:	-

N.D. - Not Determined N.A. - Not Applicable N.T. - Not Tested
< - Less Than > - Greater Than

MATERIAL SAFETY DATA SHEET

***** I IDENTIFICATION *****

MANUFACTURED BY: Vogel Paint & Wax Co., Inc.
Industrial Air Park
Orange City, Iowa 51041

REVISED: 10-MAR-88

EMERGENCY TELEPHONE # : 712-737-4993 INFORMATION TELEPHONE # : 712-737-4993

MFG. PRODUCT NUMBER: N-4006
FORMERLY:

PROPER SHIPPING NAME: PAINT

TRADE NAME: METHYL ETHYL KETONE, MEK

***** II HAZARDOUS INGREDIENTS *****

				ACGIH		OSHA				
MSG	INGREDIENT	CAS #	WT.%	TLV	STEL	PEL	CEILING	PEAK	LEL%	VAPOR PRESSURE
(1)	Methyl Ethyl Ketone	78-93-3	100	200 PPM	300 PPM	200 PPM			1.8	70.6 mm

WARNING MESSAGES:

1) Reports have associated repeated and prolonged occupational overexposure to solvents with permanent brain and nervous system damage. Intentional misuse by deliberately concentrating and inhaling the contents may be harmful or fatal. Chronic exposure may cause damage to the central nervous system, respiratory system, lung, eye, skin, liver, gastrointestinal tract, spleen, kidneys, and blood.

***** III PHYSICAL DATA *****

BOILING RANGE: 174-176 degrees F. EVAPORATION RATE: *slower than ether*

PERCENT VOLATILE BY VOLUME: 100.00% WEIGHT PER GALLON: 6.71 LBS

VAPOR DENSITY: * heavier than air *

***** IV FIRE AND EXPLOSION HAZARD DATA *****

FLASH POINT: -7 degrees C. 20 degrees F. LEL: Refer to Section II

FLAMMABILITY CLASSIFICATION: CLASS 1B

DOT CLASSIFICATION (HAZARD CLASS): *flammable liquid*

EXTINGUISHING MEDIA: *carbon dioxide, dry chemical, or fire foam*

UNUSUAL FIRE AND EXPLOSION HAZARDS: keep away from heat, sparks, and flame.

SPECIAL FIRE FIGHTING PROCEDURES: Water is unsuitable, but may be used to cool closed containers.

***** V HEALTH HAZARD DATA *****

THRESHOLD LIMIT VALUE: See Section II.

EFFECTS OF OVEREXPOSURE:
ACUTE: Inhalation of vapors could cause respiratory irritation. Liquid could irritate or damage eyes.
CHRONIC: None recognized.

MEDICAL CONDITIONS PRONE TO AGGRAVATION BY EXPOSURE: consult physician

PRIMARY ROUTE(S) OF ENTRY: skin and inhalation

EMERGENCY AND FIRST AID PROCEDURES:
INHALATION: Remove to fresh air. Restore breathing. Treat symptomatically. Consult a physician.
EYES: Flush immediately with large amounts of water for at least 15 minutes. Take to a physician for medical treatment.
SKIN: Wipe off with towel. Remove remainder with mineral spirits, turpentine, or lacquer thinner. Wash with soap and water. Remove contaminated clothing.

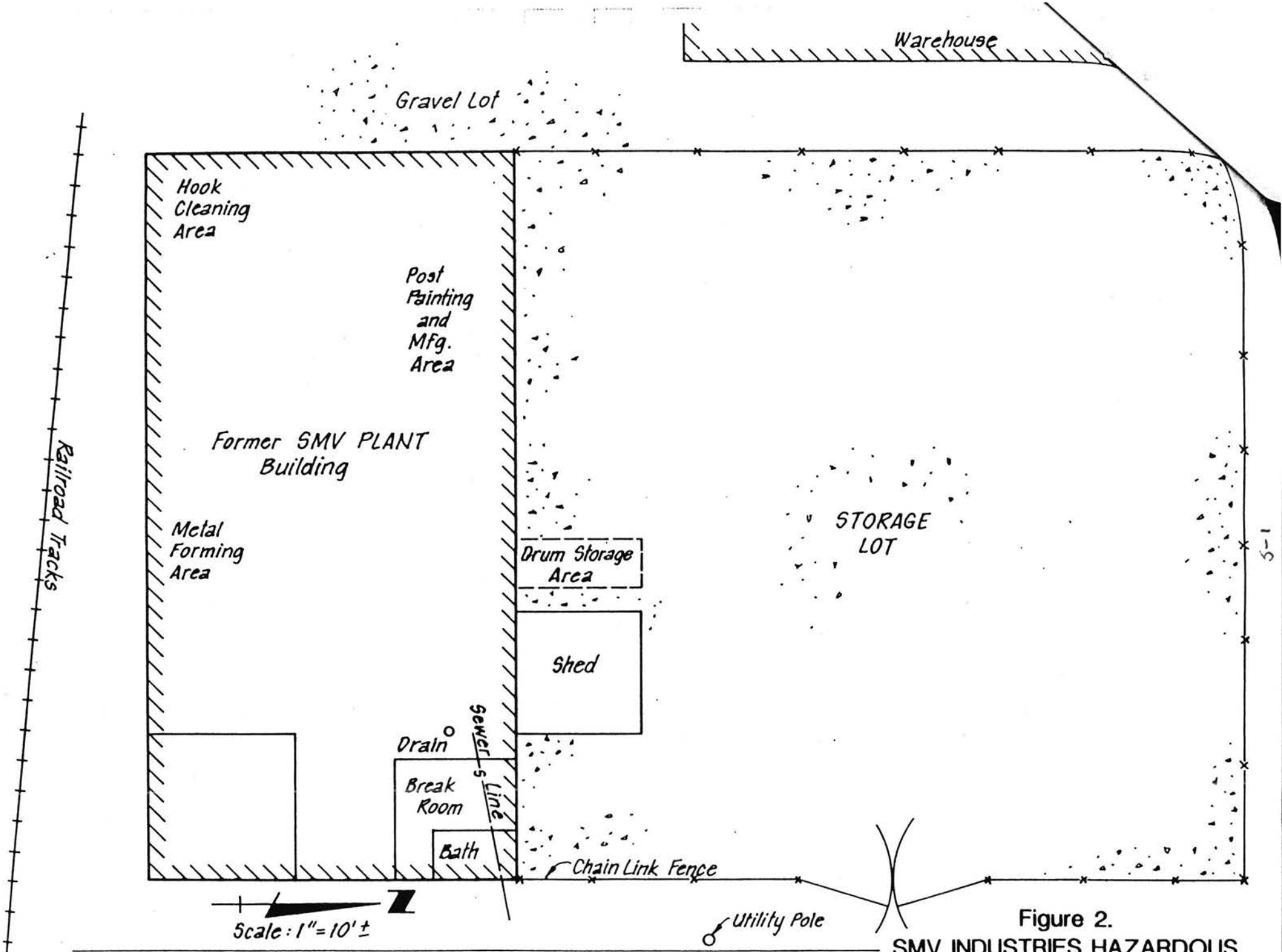

Figure 2.
SMV INDUSTRIES HAZARDOUS WASTE DRUM STORAGE AREA

HWS Consulting Group Inc
LINCOLN OFFICE
825 J St., Box 80358
Lincoln, NE 68501
402 479 2200

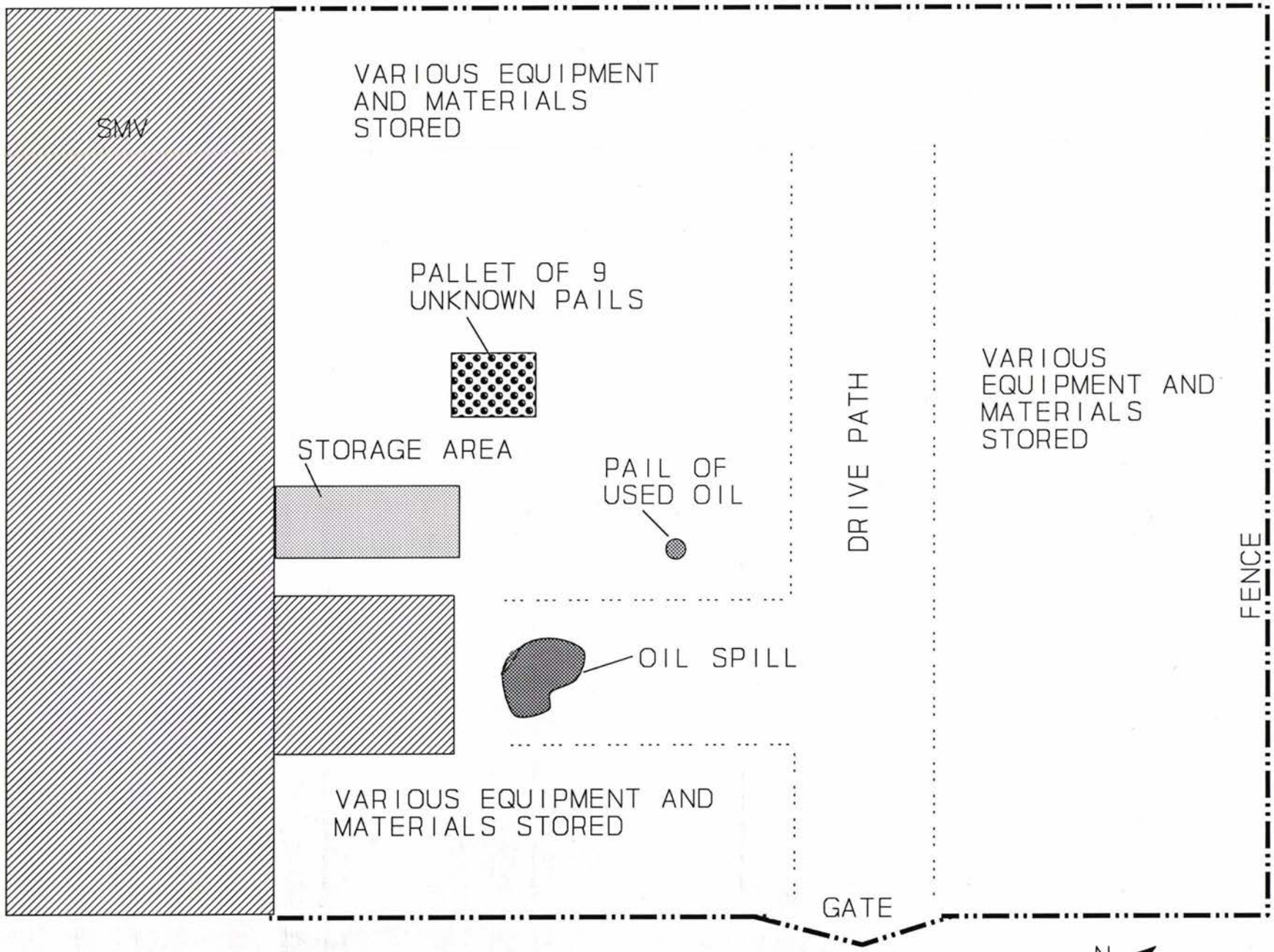

FIGURE 1: SMV FACILITY STORAGE AREA

S-2

D Newsome

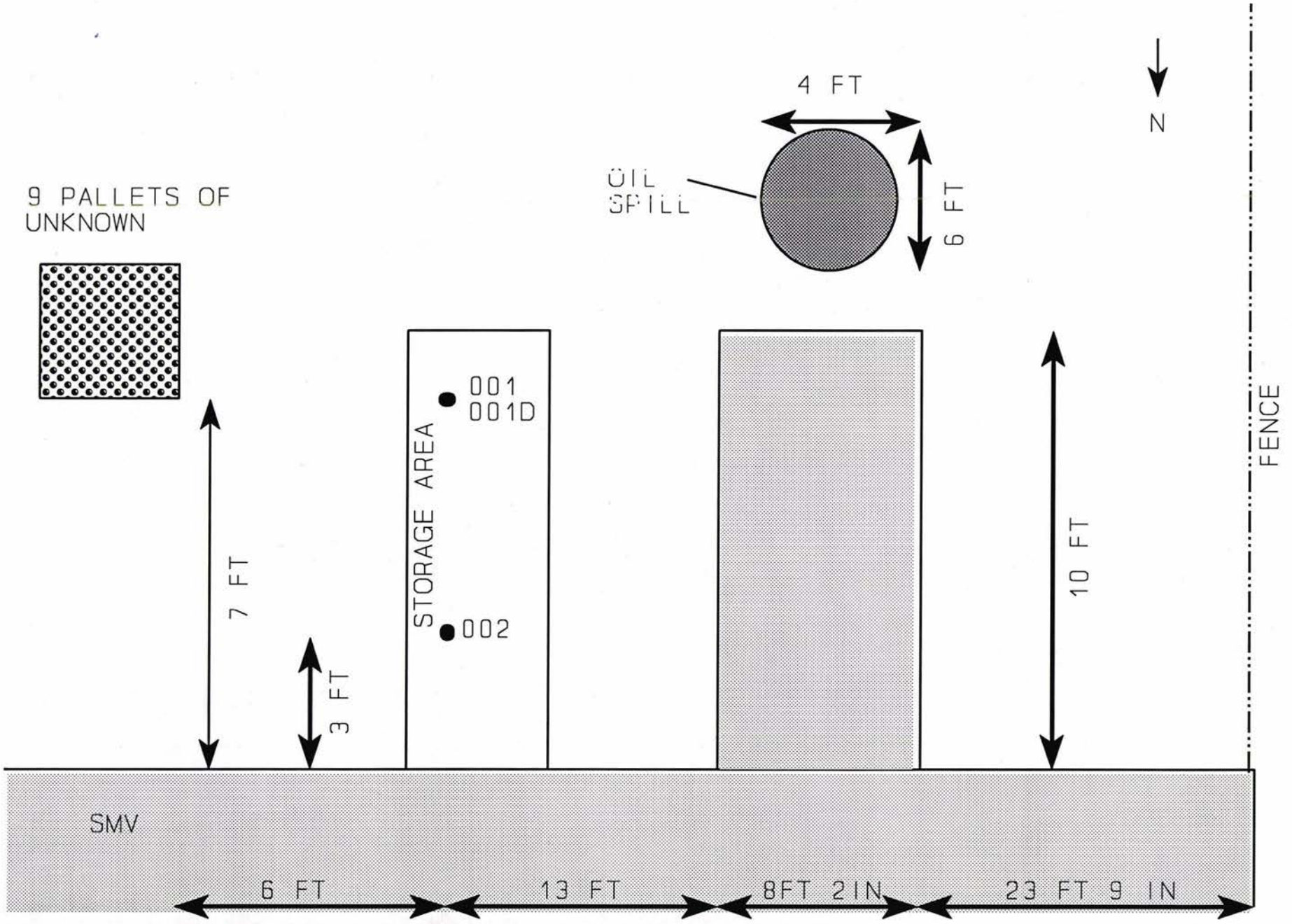

FIGURE 2: SMV SAMPLING LOCATIONS

D. Newsome

SAMPLING PLAN/QUALITY ASSURANCE PROJECT PLAN
FOR
SAMPLING ACTIVITIES TO BE CONDUCTED
AT
SMV INDUSTRIES
COUNCIL BLUFFS, IOWA
EPA RCRA ID# IAD984566034

APPROVALS:

Harriett L. Jones 10/6/94

Harriett L. Jones, P.E. Date
Project Manager

Jeffrey A. Wandtke Date
Regional Quality Assurance Manager

1.0 PURPOSE

Representatives of EPA are scheduled to conduct a closure oversight inspection at SMV Industries, Council Bluffs, Iowa on Monday, October 31, 1994. The purpose of the inspection is to determine if the facility has implemented their closure plan in compliance with EPA regulations. As part of the inspection, environmental samples will be collected for laboratory analysis. The sample results will be compared to the closure performance standard in 40 CFR 265.112 and will also be compared to the samples collected and analyzed by SMV Industries as an independent qualitative check of their results.

2.0 BACKGROUND

SMV is a tool manufacturing company located at 1103 S. 6th Street, in Council Bluffs, Iowa. SMV stored three drums of waste paint/corrosive cleaner in a gravel covered area outside of the SMV plant. This area is now being closed/decontaminated.

3.0 PERSONNEL

Harriett Jones is the project manager for this activity. Sampling and oversight activities will be conducted by ENSV for EPA.

4.0 QUALITY ASSURANCE OBJECTIVES FOR ANALYTICAL DATA AND FIELD MEASUREMENTS

The quality assurance objective for the analytical data generated by the oversight activities is to collect environmental monitoring data of known and acceptable quality. In order to meet this objective, the following quality control parameters will be addressed; precision and accuracy, completeness, representativeness, and comparability.

4.1 Precision and Accuracy

The precision and accuracy of (EPAs) analytical results will be measured using laboratory duplicate and matrix spike samples. The precision and accuracy quality control limits (in terms of spike recoveries, duplicate results, etc.) which must be met for analytical data to be considered acceptable are established in the Standard Operating Procedures found in EPA Region VII's Environmental Services Division Operations and Quality Assurance manual (Region VII's SOPs).

The control limits specified above for laboratory accuracy and precision will be utilized to identify data results outside the specified control limits (outliers). If any outliers occur or if contamination is detected in the blanks, the corresponding analysis will be flagged and the utility of the data will be assessed.

The primary quality assurance objective for field measurements is to obtain reproducible measurements. Thus, quality control procedures for field measurements will be limited to taking multiple readings and to calibration of instruments, where applicable. To obtain data for evaluation of the precision of field sampling techniques and to assess spatial variability, one field duplicate will be collected for each parameter class and, if applicable, media.

4.2 Representativeness

The objective in addressing representativeness is to assess whether the information obtained during the investigation accurately represents the actual site conditions. For the most part, requirements of representativeness are specified in the sampling approach.

4.3 Comparability

The analytical results for solids will be in mg/kg. This will enable the data to be more quickly compared to regulatory and health-based levels.

4.4 Completeness

Completeness will be assessed by comparing the number of valid sample results to the number of samples submitted for analysis. The completeness goal is 100%.

5.0 SAMPLING AND ANALYSIS

Samples of one media (soil) will be collected. The soil samples will be collected using a hand auger.

6.0 SAMPLE LOCATION

Sample locations will be identified via measuring from two different fixed permanent landmarks to the nearest 0.1 foot.

7.0 EQUIPMENT DECONTAMINATION

Decontamination will consist of washing the sampling equipment with a solution of phosphate-free laboratory grade detergent and potable water followed by a series of rinses with potable water and a final rinse of distilled water. The equipment will be allowed to air dry prior to collection of the next sample.

(Dedicated equip.)

8.0 SAMPLE HANDLING AND CUSTODY PROCEDURES AND FIELD ACTIVITY DOCUMENTATION PROCEDURES

8.1 Sample Handling, Shipment, and Custody Procedures

Sample handling, documentation, shipment and custody

procedures that will be followed are outlined below.

a. Sample identification labels will be completed in accordance with EPA Region VII protocol as specified by EPA Region VII SOP-2130.3A and will be attached to the sample containers. The completed labels will be covered with clear label tape.

b. Following the filling of the sample containers and the addition of applicable preservatives, the containers will be wiped clean to remove any liquids on the containers.

c. Chain-of-Custody forms and EPA Region VII field data sheets will be completed in accordance with EPA Region VII protocol as specified by EPA Region VII SOP-21.30A and SOP 2130.3A.

d. The white and yellow copies of the Chain-of-Custody forms and the EPA Region VII field data sheets will be placed in a zip-lock bag and taped to the inside of the cooler lid. (Note that one copy will be retained.)

e. Foam packing materials will be placed on the bottom and sides of the coolers to prevent sample container breakage, when necessary. The cooler will then be lined with a large plastic bag.

f. The 40 ml VOA vials will be placed in cubitainers with a charcoal thimble.

g. Glass sample containers will be wrapped with foam packing material and the foam ends taped so that the foam does not unravel, when necessary. This prevents the containers from falling sideways and breaking. High level waste samples will be placed in 1 gallon paint cans with Vermiculite packing.

h. Cubitainers and wrapped glass sample containers will be placed right side up into the lined cooler and void spaces will be filled with packing material, when necessary. The plastic liner in the cooler will be sealed by tying a know at the top of the plastic bag or with strong adhesive tape. Bagged ice will then be placed on top of the samples, outside of the bad containing the samples. When packing glass containers, several layers of foam packing will be placed on top of the containers when necessary.

i. The cooler will be taped for shipment and the appropriate labels for shipping environmental samples will be attached and custody seals will be placed on opposite ends of the top of the cooler, when necessary. No labels will be obscured on the cooler

j. The cooler will then be transported to the EPA Region 7 Lab or the local overnight mail service for overnight shipment of

the samples to EPA Region 7 Lab.

9.2 Sampling Documentation Procedures

Sampling documentation will consist of preparation of the following records:

1. Site Logbook* - which will include, when necessary:

   a. general site conditions
   b. weather conditions during sampling
   c. list of field personnel
   d. sample collection data
   e. sample preservation and shipment data
   f. health and safety information
   g. deviations from this plan
   h. decontamination procedures
   i. description of each sample taken

* Note that this information is also recorded on field sheets.

Logbooks will be used for documentation purposes. Each entry will be preceded by a date and signature of all individuals making entries on the page. Logbook entries will be written in indelible ink and will contain information regarding field activities. Corrections will be made to the book by drawing a single line through the incorrect entry and initialing the correction and entering the correct information.

2. Photographs - will be taken to document the following when necessary:

   a. facility
   b. site topographic features
   c. sampling locations
   d. field measurement procedures
   e. sample collection procedures
   f. sample appearance
   g. decontamination procedures
   h. safety procedures
   i. deviations from this plan

Photographs will be identified in the Site Logbook by the date and time of the photograph, witness, roll and frame number, general direction of the view, description of reference objects and a description of the subject. The camera type and film type will be also be recorded.

9.0 LABORATORY QUALITY CONTROL AND LABORATORY DATA VALIDATION

Laboratory quality control and laboratory data validation will be the responsibility of the EPA Region 7 Lab.

10.0 REPORT

A report for this sampling activity will be completed and will incorporate the analytical data.

ATTACHMENTS

1. Sample Summary Table w/Levels of Interest
2. Analytical Services Request Form
3. Copy of EPA-Approved Closure Plan and EPA's modifications

SAMPLE SUMMARY AND LEVELS OF INTEREST

NUMBER OF SAMPLES	MATRIC	ANALYTICAL METHODS (from SW-846)	CONTAINERS	PRESERVATIVE	CONSTITUENT	LEVEL OF INTEREST
1 trip blank	soil	8240	2-40 ml VOA	Cool to four degrees celsius	Methylene Chloride Remaining constituents in MGP SV	100 micrograms per kilogram 100 micrograms per kilogram
3 (includes 1 duplicate)	soil	8240 8270	2-40 ml VOA 8 oz glass	Cool to four degrees celsius 1:1 HCl to pH < 2	All 34 constiuents in Regular Group SV All 29 constituents in Regular Group SP	100 micrograms per kilogram 100 micrograms per kilogram

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
ENVIRONMENTAL SERVICES DIVISION
REGION 7
25 FUNSTON ROAD
KANSAS CITY, KANSAS 66115

OCT 19 1994

MEMORANDUM

SUBJECT: Review of Sampling Plan/QAPP for SMV Industries
Council Bluffs, Iowa (QQG45)

FROM: Robert B. Dona RB Dona
Environmental Engineer, EDSB/ENSV

THRU: Jeffrey A. Wandtke
Regional QA Manager, EDSB/ENSV

TO: Harriet L. Jones
Project Manager, IOWA/RCRA/WSTM

I have reviewed the Sampling Plan/Quality Assurance Project Plan (QAPP) for a closure oversight inspection at SMV Industries, Council Bluffs, Iowa, and I recommend its approval with the following comments.

1. The sampling plan does not include field quality control samples. I recommend the inclusion of a trip blank for measurement of contamination of the volatile organic compound samples. This sample will assist in the evaluation of the representativeness of the environmental samples. I also recommend the collection of a duplicate sample. This sample will assist in the evaluation of total measurement precision and the quality of the facility's analytical results. As we discussed, I have added these samples to the Analytical Services Request (ASR) form.

2. The sample summary table appears to be taken from the Iowa State Penitentiary sampling plan. The references to method 8270 and regular group SP should refer to method 6010 and total and TCLP lead and chromium. Acid should not be added to the sample for preservation.

3. As Dedriel Newsome has assigned the activity number ANF74 to this sampling activity, I would expect that our laboratory data will be transmitted to her for review and validation prior to its transmittal to you.

If there are any questions, please call me at 551-5182.

Attachment
QA Document No. 95009

cc: Dedriel Newsome, EMCM/ENSV

6-8

QA Document Review Checklist

To be completed by QA Office.

Project/Plan Name: Closure Oversight at SMV Industries, Council Bluffs, Iowa

QA Activity No.: QQG45 Project Leader: Harriet Jones Phone: 551-7730

QA Document No.: 95009 QA Coordinator: Robert Dona Phone: 551-5182

To be completed by QA Reviewer.

Deficiencies were found in the elements checked below:
(See the attached review comments for explanation)

1. Project Objectives

___ Objective or scope of the data collection activity
___ Intended use of the data
___ Action level, detection limit requirements, data quality objectives

2. Sampling (Design and Procedures)

___ Sampling network and rationale
___ Sampling schedule, locations, frequency, project duration
X Sample matrices, target analytes
___ Sampling/Decontamination procedures
X Sample containers, preservation, holding times
___ Sample shipment/transportation, coordination with the laboratory
___ Sample custody and documentation of field activities

3. Analytical Methods

___ Quality of written procedure or choice of reference
___ Method detection limit, precision, accuracy, comparability
___ Laboratory documentation

4. Field/Laboratory QC Samples

X Field QC elements
___ Laboratory QC elements
___ Frequency of QC checks
___ Control limits and corrective actions

5. Data Review, Validation and Reporting

___ Review process
___ Acceptance/Rejection criteria for validation
___ Data deliverables

Review conducted by: Robert Dona

To be completed by QA Office.

QA REVIEW CONCLUSION: QA Coordinator (sign): Robert B Dona

Review Completion Date: October 17, 1994

(1) ___ Approval Recommended (2) X Approval Recommended With Comments (3) ___ Resubmission Recommended

USEPA Region VII Analytical Services Request (ASR) Form

Activity No.: ANF74 (A70) Date: October 6, 1994
Site Name, City, & State: SMV Industries, Council Bluffs, IA
EPA Project Manager: Harriett Jones
Section/Branch: RCRA/IOWA Phone No.: 551-7730
Contractor Contact: n/a
Contractor: _____ Phone No.: _____
Projected Sample Delivery Date: 10/31/94
Funding Program Element: RCRA Closure Oversight

Request Summary:

No. of Samples	Matrix	Group/Parameter Name	Group/Parameter MGP Code
23*	soil	toluene, xylene, ethylbenzene, tetrachloroethylene, lead, chromium (total + TCLP) RBD	S85, SV25 SM14, SM06 SM60, SM51
1	soil trip blanks	RBD "	S85, SV25

Use additional pages as needed for clarity.

Levels Of Interest Are Specified (mark one): In The QA Document-☐
or On The Back-X

Special Requirements or Comments:
* includes one duplicate

NOTE: Submit This Form To RQAM/ENSV 30 Days Before Sample Delivery

Approvals:

Harriett Jones 10/6/94 James V. Callis 10/7/94
EPA Project Manager (Date) EPA Branch or Section Chief (Date)

The Following Is Completed By ENSV Personnel ONLY

RECEIVED 10/17/94 RBDona

QA Document: ☐-Generic QAPP ☑-Site Specific QAPP ☐-Other: _____
Concurrences:
RQAM: RBDona APPROVED RQA-45/94009 Comment: _____

Chief, LABO: _____ Comment: _____

Laboratory Assignment:

☐-Region VII _____
☐-ESAT _____
☐-CLP _____
☐-RECAP _____
☐-Other _____

Scheduled Completion:

☐-Routine:
- Non-CLP = 4 weeks
- CLP = 8 weeks

☐-Other: _____

Date: _____

Levels Of Interest

(Use Additional Copies Of This Form As Needed)

Activity No.: ANF74 Site Name: SMV Industries, Council Bluffs, IA

Individual Parameter/ Parameter Group	Matrix	Concentration Level of Interest	Units
toluene	soil	500	mg/kg
xylene	soil	500	mg/kg
ethylbenzene	soil	10	mg/kg
tetrachloroethylene	soil	5	mg/kg
lead (total)	soil	100	mg/kg
chromium (total)	soil	100	mg/kg
lead (TCLP)	soil	5	mg/l
chromium (TCLP)	soil	5	mg/l

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
ENVIRONMENTAL SERVICES DIVISION
REGION 7
25 FUNSTON ROAD
KANSAS CITY, KANSAS 66115

DATE: NOV 15 1994

MEMORANDUM

SUBJECT: Data Transmittal for Activity #: ANF74
Site Description: SMV Ind.

FROM: Andrea Jirka
Chief, Laboratory Branch, ENSV

TO: John Helvig
Chief, EMCM-ENSV

ATTN: Dedrick Newsome

Attached is the data transmittal for the above referenced site. The data contained in this transmittal have been approved by the Laboratory Branch. This should be considered a ____ Partial or X Complete data transmittal (completes transmittal of _____). The Project Leader should notify the Laboratory Branch within 14 days of any changes in the LAST analytical database. If you have any questions, comments, or data changes, please contact Dee Simmons at 551-5129.

Attachment

cc: Analytical Data File

DRAFT

FIELD SHEET

U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION VII
ENVIRONMENTAL SERVICES DIV. 25 FUNSTON RD. KANSAS CITY, KS 66115

FY: 95 ACTNO: ANF74 SAMNO: 001 QCC: _ MEDIA: SOIL PL: NEWSOME, DEDRIEL

ACTIVITY DES: SMV INDUSTRIES REF LATITUDE: __ __ __
LOCATION: COUNCIL BLUFFS IA PROJECT NUM: A70 PT: LONGITUDE: ___ __ __

SAMPLE DES: Drum Storage Area
LOCATION: South IA
CASE/BATCH/SMO: ____/_/____ LAB: ___
STORET/AIRS NO: _____

	DATE	TIME	FROM REF PT
BEG:	10/31/94	11:15	EAST: ____
END:	10/31/94	11:30	NORTH: ____
			DOWN: ____

ANALYSIS REQUESTED:

CONTAINER	PRESERVATIVE	MGP	NAME
8 OZ GLASS	COOL (4 C)	S85	BENZENE TOLUENE ETHYLBENZE
2-40 ML VIALS	COOL (4 C)	SV25	TETRACHLOROETHYLENE, BY GC
8 OZ GLASS	COOL (4 C)	SM08	CHROMIUM, TOTAL, BY ICAP
8 OZ GLASS	COOL (4 C)	SM14	LEAD, TOTAL, BY ICAP
8 OZ GLASS	COOL (4 C)	SM50	CHROMIUM, TCLP
8 OZ GLASS	COOL (4 C)	SM51	LEAD, TCLP

SG07 % Solids

COMMENTS: FOR SUPERFUND ONLY: SUBSITE IDENTIFIER:___ OPERABLE UNIT:___

Soil was Slightly Moist & dark Brown

SAMPLE COLLECTED BY : Clint Sperry

DRAFT

FIELD SHEET

U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION VII

ENVIRONMENTAL SERVICES DIV. 25 FUNSTON RD. KANSAS CITY, KS 66115

FY: 95 ACTNO: ANF74 SAMNO: 001 QCC: D MEDIA: SOIL PL: NEWSOME, DEDRIEL

ACTIVITY DES: SMV INDUSTRIES REF LATITUDE: __ __ __

LOCATION: COUNCIL BLUFFS IA PROJECT NUM: A70 PT: LONGITUDE: ___ __ __

SAMPLE DES: Drum Storage Area

LOCATION: South IA

CASE/BATCH/SMO: ____/__/____ LAB: ___

STORET/AIRS NO: _____

	DATE	TIME	FROM REF PT
BEG:	10/31/94	11:15	EAST: ____
END:	10/31/94	11:30	NORTH: ____
			DOWN: ____

ANALYSIS REQUESTED:

CONTAINER	PRESERVATIVE	MGP	NAME
8 OZ GLASS	COOL (4 C)	S85	BENZENE TOLUENE ETHYLBENZE
2-40 ML VIALS	COOL (4 C)	SV25	TETRACHLOROETHYLENE, BY GC
8 OZ GLASS	COOL (4 C)	SM08	CHROMIUM, TOTAL, BY ICAP
8 OZ GLASS	COOL (4 C)	SM14	LEAD, TOTAL, BY ICAP
8 OZ GLASS	COOL (4 C)	SM50	CHROMIUM, TCLP
8 OZ GLASS	COOL (4 C)	SM51	LEAD, TCLP

SG07 90 Solids

COMMENTS: FOR SUPERFUND ONLY: SUBSITE IDENTIFIER: ___ OPERABLE UNIT: ___

Soil was slightly moist & dark brown

SAMPLE COLLECTED BY : Clint Sperry

DRAFT

FIELD SHEET
U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION VII
ENVIRONMENTAL SERVICES DIV. 25 FUNSTON RD. KANSAS CITY, KS 66115

FY: 95 ACTNO: ANF74 SAMNO: 002 QCC: _ MEDIA: SOIL PL: NEWSOME, DEDRIEL

ACTIVITY DES: SMV INDUSTRIES REF LATITUDE: __ __ __
LOCATION: COUNCIL BLUFFS IA PROJECT NUM: A70 PT: LONGITUDE: ___ __ __

SAMPLE DES: Drum Storage Area
LOCATION: North IA
CASE/BATCH/SMO: _____/_/_____ LAB: ___
STORET/AIRS NO: _____

	DATE	TIME	FROM REF PT
BEG:	10/31/94	11:42	EAST: ____
END:	10/31/94	12:00	NORTH: ____
			DOWN: ____

ANALYSIS REQUESTED:

CONTAINER	PRESERVATIVE	MGP	NAME
8 OZ GLASS	COOL (4 C)	S85	BENZENE TOLUENE ETHYLBENZE
2-40 ML VIALS	COOL (4 C)	SV25	TETRACHLOROETHYLENE, BY GC
8 OZ GLASS	COOL (4 C)	SM08	CHROMIUM, TOTAL, BY ICAP
8 OZ GLASS	COOL (4 C)	SM14	LEAD, TOTAL, BY ICAP
8 OZ GLASS	COOL (4 C)	SM50	CHROMIUM, TCLP
8 OZ GLASS	COOL (4 C)	SM51	LEAD, TCLP
		SG07	% Solids

COMMENTS: FOR SUPERFUND ONLY: SUBSITE IDENTIFIER:___ OPERABLE UNIT:___

Soil was slightly moist & dark brown

SAMPLE COLLECTED BY : Clint Sperry

DRAFT

FIELD SHEET
U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION VII
ENVIRONMENTAL SERVICES DIV. 25 FUNSTON RD. KANSAS CITY, KS 66115

FY: 95 ACTNO: ANF74 SAMNO: 003 QCC: F MEDIA: SOIL PL: NEWSOME, DEDRIEL

ACTIVITY DES: SMV INDUSTRIES REF LATITUDE: __ __ __
LOCATION: COUNCIL BLUFFS IA PROJECT NUM: A70 PT: LONGITUDE: ___ __ __

SAMPLE DES: TRIP BLANK DATE TIME FROM REF PT
LOCATION: _____ IA BEG: __/__/__ __:__ EAST: ____
CASE/BATCH/SMO: _____/_/_____ LAB: ___ END: __/__/__ __:__ NORTH: ____
STORET/AIRS NO: _____ DOWN: ____

ANALYSIS REQUESTED:

CONTAINER	PRESERVATIVE	MGP	NAME
8 OZ GLASS	COOL (4 C)	S85	BENZENE TOLUENE ETHYLBENZE
2-40 ML VIALS	COOL (4 C)	SV25	TETRACHLOROETHYLENE, BY GC

SG07 % Solids

COMMENTS: FOR SUPERFUND ONLY: SUBSITE IDENTIFIER: ___ OPERABLE UNIT: ___

SAMPLE COLLECTED BY : _____

DO 11/1/94

CHAIN OF CUSTODY RECORD
ENVIRONMENTAL PROTECTION AGENCY REGION VII

ACTIVITY LEADER(Print)	NAME OF SURVEY OR ACTIVITY	DATE OF COLLECTION (DAY / MONTH / YEAR)	SHEET
Dedriel Newsome	SMV Industries	10 / 31 / 94	1 of 1

CONTENTS OF SHIPMENT

SAMPLE NUMBER	TYPE OF CONTAINERS: CUBITAINER	BOTTLE	BOTTLE	BOTTLE	VOA SET (2 VIALS EA)	SAMPLED MEDIA: water	soil	sediment	dust	other	RECEIVING LABORATORY REMARKS/OTHER INFORMATION (condition of samples upon receipt, other sample numbers, etc.)
	NUMBERS OF CONTAINERS PER SAMPLE NUMBER										
ANF74-001		2			1		X				
ANF74-001D		1			1		X				
ANF74-002		2			1		X				
Nothing Follows											
ANF74003FD					1		X				

DESCRIPTION OF SHIPMENT

89 PIECE(S) CONSISTING OF _____ BOX(ES)

1 ICE CHEST(S); OTHER _____

MODE OF SHIPMENT

_____ COMMERCIAL CARRIER: _____

_____ COURIER

X SAMPLER CONVEYED

_____ (SHIPPING DOCUMENT NUMBER)

PERSONNEL CUSTODY RECORD

RELINQUISHED BY (SAMPLER)	DATE	TIME	RECEIVED BY	REASON FOR CHANGE OF CUSTODY
Dedriel Newsome X SEALED ☐ UNSEALED	10/31/94	2:45pm	Clint Spencer X SEALED ☐ UNSEALED	Transport to Lab
RELINQUISHED BY	DATE	TIME	RECEIVED BY	REASON FOR CHANGE OF CUSTODY
Clint Spencer X SEALED ☐ UNSEALED	11/1/94	1:15pm	Diana Jacks X SEALED ☐ UNSEALED	analyze
RELINQUISHED BY	DATE	TIME	RECEIVED BY	REASON FOR CHANGE OF CUSTODY
☐ SEALED ☐ UNSEALED			☐ SEALED ☐ UNSEALED	

7-EPA-9262(Revised 5/85)

CHAIN OF CUSTODY RECORD
ENVIRONMENTAL PROTECTION AGENCY REGION VII

ACTIVITY LEADER(Print)	NAME OF SURVEY OR ACTIVITY	DATE OF COLLECTION (DAY / MONTH / YEAR)	SHEET
Dedriel Newsome	SMV Industries	10 / 31 / 94	1 of 1

CONTENTS OF SHIPMENT

SAMPLE NUMBER	TYPE OF CONTAINERS: CUBITAINER	BOTTLE	BOTTLE	BOTTLE	VOA SET (2 VIALS EA)	SAMPLED MEDIA: water	soil	sediment	dust	other	RECEIVING LABORATORY REMARKS/OTHER INFORMATION (condition of samples upon receipt, other sample numbers, etc.)
	NUMBERS OF CONTAINERS PER SAMPLE NUMBER										
ANF74-001		2			1		X				
ANF74-001D		1			1		X				
ANF74-002		2			1		X				
	Nothing Follows										
ANF74003FB					1						

DESCRIPTION OF SHIPMENT

89 PIECE(S) CONSISTING OF _____ BOX(ES)

1 ICE CHEST(S); OTHER _____

MODE OF SHIPMENT

_____ COMMERCIAL CARRIER: _____

_____ COURIER

X SAMPLER CONVEYED

_____ (SHIPPING DOCUMENT NUMBER)

PERSONNEL CUSTODY RECORD

RELINQUISHED BY (SAMPLER)	DATE	TIME	RECEIVED BY	REASON FOR CHANGE OF CUSTODY
Dedriel Newsome — X SEALED ☐ UNSEALED	10/31/94	2:45pm	Clint Lacy — X SEALED ☐ UNSEALED	Transport to Lab
RELINQUISHED BY	DATE	TIME	RECEIVED BY	REASON FOR CHANGE OF CUSTODY
Clint Lacy — X SEALED ☐ UNSEALED	11/1/94	1:15pm	Diana Jacks — ☐ SEALED ☐ UNSEALED	analyze
RELINQUISHED BY	DATE	TIME	RECEIVED BY	REASON FOR CHANGE OF CUSTODY
☐ SEALED ☐ UNSEALED			☐ SEALED ☐ UNSEALED	

7-EPA-9262(Revised 5/85)

ANALYSIS REQUEST REPORT — VALIDATED DATA

FOR ACTIVITY: ANF74

NEWSOME, DEDRIEL — 11/22/94 12:17:54 — ALL REAL SAMPLES AND FIELD Q.C.

* FINAL REPORT

FY: 95 ACTIVITY: ANF74 DESCRIPTION: SMV INDUSTRIES LOCATION: COUNCIL BLUFFS IOWA

STATUS: ACTIVE TYPE: SAMPLING - IN HOUSE ANALYSIS PROJECT: A70

LABO DUE DATE IS 12/ 1/94. REPORT DUE DATE IS 12/30/94.

INSPECTION DATE: 10/31/94 ALL SAMPLES RECEIVED DATE: 11/01/94

ALL DATA APPROVED BY LABO DATE: 11/15/94 FINAL REPORT TRANSMITTED DATE: 11/22/94

EXPECTED LABO TURNAROUND TIME IS 30 DAYS EXPECTED REPORT TURNAROUND TIME IS 60 DAYS

ACTUAL LABO TURNAROUND TIME IS 14 DAYS ACTUAL REPORT TURNAROUND TIME IS 22 DAYS

SITE CODE: SITE:

SAMP. NO.	QCC	M	DESCRIPTION	SAMPLE # STATUS	CITY	STATE	AIRS/ STORET LOC NO	SECT	LAY-ER	BEG. DATE	BEG. TIME	END. DATE	END. TIME
001		S	DRUM STORAGE AREA SOUTH	1	COUNCIL BLUFFS	IOWA				10/31/94	11:15	10/31/94	11:30
001	D	S	DRUM STORAGE AREA SOUTH	1	COUNCIL BLUFFS	IOWA				10/31/94	11:15	10/31/94	11:30
002		S	DRUM STORAGE AREA NORTH	1	COUNCIL BLUFFS	IOWA				10/31/94	11:42	10/31/94	12:00
003	F	S	TRIP BLANK	1	COUNCIL BLUFFS	IOWA				00/00/00	00:00	/ /	:

EXPLANATION OF CODES AND INFORMATION ON ANALYSIS REQUEST DETAIL REPORT

SAMPLE INFORMATION:

SAMP. NO. = SAMPLE IDENTIFICATION NUMBER (A 3-DIGIT NUMBER WHICH IN COMBINATION WITH THE ACTIVITY NUMBER AND QCC, PROVIDES AN UNIQUE NUMBER FOR EACH SAMPLE FOR IDENTIFICATION PURPOSES)

QCC = QUALITY CONTROL CODE (A ONE-LETTER CODE USED TO DESIGNATE SPECIFIC QC SAMPLES. THIS FIELD WILL BE BLANK FOR ALL NON-QC OR ACTUAL SAMPLES):
- B = CAL INCREASED CONCENTRATION FOR A LAB SPIKED DUP SAMPLE
- D = MEASURED VALUE FOR FIELD DUPLICATE SAMPLE
- F = MEASURED VALUE FOR FIELD BLANK
- G = MEASURED VALUE FOR METHOD STANDARD
- H = TRUE VALUE FOR METHOD STANDARD
- K = CAL INCREASED CONCENTRATION FOR FIELD SPIKED DUP SAMPLE
- L = MEASURED VALUE FOR A LAB DUPLICATE SAMPLE
- M = MEASURED VALUE FOR LAB BLANK
- N = MEASURED CONCENTRATION OF FIELD SPIKED DUPLICATE
- P = MEASURED VALUE FOR PERFORMANCE STANDARD
- R = CAL INCREASED CONCENTRATION RESULTING FROM LAB SPIKE
- S = MEASURED CONCENTRATION OF LAB SPIKED SAMPLE
- T = TRUE VALUE OF PERFORMANCE STANDARD
- W = MEASURED CONCENTRATION OF LAB SPIKED DUPLICATE
- Y = MEASURED CONCENTRATION OF FIELD SPIKED SAMPLE
- Z = CAL INCREASED CONCENTRATION RESULTING FROM FIELD SPIKE
- 1 = MEASURED VALUE OF FIRST SPIKED REPLICATE
- 2 = MEASURED VALUE OF SECOND SPIKED REPLICATE
- 3 = MEASURED VALUE OF THIRD SPIKED REPLICATE
- 4 = MEASURED VALUE OF FOURTH SPIKED REPLICATE
- 5 = MEASURED VALUE OF FIFTH SPIKED REPLICATE
- 6 = MEASURED VALUE OF SIXTH SPIKED REPLICATE
- 7 = MEASURED VALUE OF SEVENTH SPIKED REPLICATE

M = MEDIA CODE (A ONE-LETTER CODE DESIGNATING THE MEDIA OF THE SAMPLE):
- A = AIR
- H = HAZARDOUS WASTE/OTHER
- S = SOLID (SOIL, SEDIMENT, SLUDGE)
- T = TISSUE (PLANT & ANIMAL)
- W = WATER (GROUND WATER, SURFACE WATER, WASTE WATER, DRINKING WATER)

DESCRIPTION = A SHORT DESCRIPTION OF THE LOCATION WHERE SAMPLE WAS COLLECTED

AIRS/STORET LOC. NO. = THE SPECIFIC LOCATION ID NUMBER OF EITHER OF THESE NATIONAL DATABASE SYSTEMS, AS APPROPRIATE

DATE/TIME INFORMATION = SPECIFIC INFORMATION REGARDING WHEN THE SAMPLE WAS COLLECTED
- BEG. DATE = DATE SAMPLING WAS STARTED
- BEG. TIME = TIME SAMPLING WAS STARTED
- END DATE = DATE SAMPLING WAS COMPLETED
- END TIME = TIME SAMPLING WAS COMPLETED
- NOTE: A GRAB SAMPLE WILL CONTAIN ONLY BEG. DATE/TIME
  A TIMED COMPOSITE SAMPLE WILL CONTAIN BOTH BEG AND END DATE/TIME TO DESIGNATE DURATION OF SAMPLE COLLECTION

OTHER CODES
- V = VALIDATED

ANALYTICAL RESULTS/MEASUREMENTS INFORMATION:

COMPOUND = MGP (MEDIA-GROUP-PARAMETER) CODE AND NAME OF THE MEASURED CONSTITUENT OR CHARACTERISTIC OF EACH SAMPLE

UNITS = SPECIFIC UNITS IN WHICH RESULTS ARE REPORTED:
- C = CENTIGRADE (CELSIUS) DEGREES
- CFS = CUBIC FEET PER SECOND
- GPM = GALLONS PER MINUTE
- IN = INCHES
- I.D. = SPECIES IDENTIFICATION
- KG = KILOGRAM
- L = LITER
- LB = POUNDS
- MG = MILLIGRAMS (1 X 10-3 GRAMS)
- MGD = MILLION GALLONS PER DAY
- MPH = MILES PER HOUR
- MV = MILLIVOLT
- M/F = MALE/FEMALE
- M2 = SQUARE METER
- M3 = CUBIC METER
- NA = NOT APPLICABLE
- NG = NANOGRAMS (1 X 10-9 GRAMS)
- NTU = NEPHELOMETRIC TURBIDITY UNITS
- PC/L = PICO (1 X 10-12) CURRIES PER LITER
- PG = PICOGRAMS (1 X 10-12 GRAMS)
- P/CM2 = PICOGRAMS PER SQUARE CENTIMETER
- SCM = STANDARD CUBIC METER (1 ATM, 25 C)
- SQ FT = SQUARE FEET
- SU = STANDARD UNITS (PH)
- UG = MICROGRAMS (1 X 10-6 GRAMS)
- UMHOS = MICROMHOS/CM (CONDUCTIVITY UNITS)
- U/CC2 = MICROGRAMS PER 100 SQUARE CENTIMETERS
- U/CM2 = MICROGRAMS PER SQUARE CENTIMETER
- 1000G = 1000 GALLONS
- +/- = POSITIVE/NEGATIVE
- # = NUMBER

DATA QUALIFIERS = SPECIFIC CODES USED IN CONJUNCTION WITH DATA VALUES TO PROVIDE ADDITIONAL INFORMATION ON THE REPORTED RESULTS, OR USED TO EXPLAIN THE ABSENCE OF A SPECIFIC VALUE:
- BLANK = IF FIELD IS BLANK, NO REMARKS OR QUALIFIERS ARE PERTINENT. FOR FINAL REPORTED DATA, THIS MEANS THAT THE VALUES HAVE BEEN REVIEWED AND FOUND TO BE ACCEPTABLE FOR USE.
- I = INVALID SAMPLE/DATA - VALUE NOT REPORTED
- J = DATA REPORTED BUT NOT VALID BY APPROVED QC PROCEDURES
- K = ACTUAL VALUE OF SAMPLE IS < VALUE REPORTED
- L = ACTUAL VALUE OF SAMPLE IS > VALUE REPORTED
- M = DETECTED BUT BELOW THE LEVEL OF REPORTED VALUE FOR ACCURATE QUANTIFICATION
- O = PARAMETER NOT ANALYZED
- U = ACTUAL VALUE OF SAMPLE IS < THE MEASUREMENT DETECTION LIMIT (REPORTED VALUE)

ANALYSIS REQUEST DETAIL REPORT ACTIVITY: 5-ANF74 VALIDATED DATA

COMPOUND	UNITS	001	001 D	002	003 F	
SG07 SOLIDS, PERCENT	%	84.6	83.9	83.4	97.9	
SM08 CHROMIUM, TOTAL, BY ICAP	MG/KG	18.1	17.1	23.1		
SM14 LEAD, TOTAL, BY ICAP	MG/KG	179	204	142		
SM50 CHROMIUM, TCLP	MG/L	0.00369 U	0.00369 U	0.00369 U		
SM51 LEAD, TCLP	MG/L	0.0251 U	0.0251 U	0.0251 U		
SV17 BENZENE, BY GC/MS	UG/KG	7 U	7 U	9 U	6 U	
SV25 TETRACHLOROETHYLENE, BY GC/MS	UG/KG	7 U	7 U	9 U	6 U	
SV26 TOLUENE, BY GC/MS	UG/KG	7 U	7 U	9 U	6 U	
SV29 ETHYL BENZENE, BY GC/MS	UG/KG	7 U	7 U	9 U	6 U	
SV37 XYLENES, TOTAL, BY GC/MS	UG/KG	7 U	7 U	9 U	6 U	
ZZ01 SAMPLE NUMBER	NA	001	001	002	003	
ZZ02 ACTIVITY CODE	NA	ANF74	ANF74	ANF74	ANF74	

ACTIVITY ANF74 SMV INDUSTRIES

THE PROJECT LEADER SHOULD CIRCLE ONE - STORET, AIRS, OR ARCHIVE.

CIRCLE ONE: STORET AIRS ARCHIVE

FINAL DATA REPORT APPROVED BY PROJECT LEADER ON 11/22/94 12:17:54 BY Dedrick Newsome.

8-4

PHOTO LOG

SMV Industries Council Bluffs, IA
10/31/94 PHOTO 1

Past storage area next to tree where stack of pallets located.

D. Newsome

SMV Industries Council Bluffs, IA
10/31/94 PHOTO 2

Past storage area next to tree where stack of pallets located. (Close-up of photo 1)

D. Newsome

SMV Industries Council Bluffs, IA
10/31/94 PHOTO 3

9 pails of unknown about 6ft to east of sample point 001.

D. Newsome

SMV Industries Council Bluffs, IA
10/31/94 PHOTO 4

9 pails of unknown about 6ft to east of sample point 001. The two pails pointed out by the red arrows measured 9 units on the Hnu meter (10.2eV probe). All others measured no detection
D. Newsome

SMV Industries Council Bluffs, IA
10/31/94 PHOTO 5

9 pails of unknown about 6ft to east of sample point 001. (A couple of the pails shown with the lid off.)

D. Newsome

SMV Industries Council Bluffs, IA
10/31/94 PHOTO 6

Pails of used oil generated from tractor overhauling.

D. Newsome

SMV Industries Council Bluffs, IA
10/31/94 PHOTO 7

Pails of used oil generated from tractor overhauling. (Close-up of photo 6)

D. Newsome

SMV Industries Council Bluffs, IA
10/31/94 PHOTO 8

Oil spill from tractor overhauling in shadow of HWS's van in front of shed.

D. Newsome

SMV Industries Council Bluffs, IA
10/31/94 PHOTO 9

Area of sample point 001 and 001D prior to leaves and gravel removed.

D. Newsome

SMV Industries Council Bluffs, IA
10/31/94 PHOTO 10

Area of sample point 001 and 001D after sample was collected.

D. Newsome

SMV Industries Council Bluffs, IA
10/31/94 PHOTO 11

PHOTOS NOT INCLUDED IN REPORT

Area of sample point 002 after sample was collected.

D. Newsome

SMV Industries Council Bluffs, IA
10/31/94

Hnu near area of sample point 001 and 001D.

D. Newsome

SMV Industries Council Bluffs, IA
10/31/94 PHOTO 1

Past storage area next to tree where stack of pallets located.

D. Newsome

SMV Industries Council Bluffs, IA
10/31/94 PHOTO 2

Past storage area next to tree where stack of pallets located. (Close-up of photo 1)

D. Newsome

SMV Industries Council Bluffs, IA
10/31/94 PHOTO 3

9 pails of unknown about 6ft to east of sample point 001.

D. Newsome

SMV Industries Council Bluffs, IA
10/31/94 PHOTO 4

9 pails of unknown about 6ft to east of sample point 001. The two pails pointed out by the red arrows measured 9 units on the Hnu meter (10.2eV probe). All others measured no detection
D. Newsome DN

SMV Industries Council Bluffs, IA
10/31/94 PHOTO 5

9 pails of unknown about 6ft to east of sample point 001. (A couple of the pails shown with the lid off.)

D. Newsome

SMV Industries Council Bluffs, IA
10/31/94 PHOTO 6

Pails of used oil generated from tractor overhauling.

D. Newsome

SMV Industries Council Bluffs, IA
10/31/94 PHOTO 7

Pails of used oil generated from tractor overhauling. (Close-up of photo 6)

D. Newsome

SMV Industries Council Bluffs, IA
10/31/94 PHOTO 8

Oil spill from tractor overhauling in shadow of HWS's van in front of shed.

D. Newsome

SMV Industries Council Bluffs, IA
10/31/94 PHOTO 9

Area of sample point 001 and 001D
prior to leaves and gravel removed.

D. Newsome

SMV Industries Council Bluffs, IA
10/31/94 PHOTO 10

Area of sample point 001 and 001D
after sample was collected.

D. Newsome

SMV Industries Council Bluffs, IA
10/31/94 PHOTO 11

Area of sample point 002 after sample was collected.

D. Newsome