



REMOVAL SUPPORT TEAM  
EPA CONTRACT 68-W-00-113

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November 29, 2004

Mr. Kevin Matheis, On-Scene Coordinator  
U.S. Environmental Protection Agency, Region II  
Removal Action Branch  
111 W. Huron Street, Room 1114  
Buffalo, New York 1402

**EPA CONTRACT NO: 68-W-00-113**  
**TECHNICAL DIRECTIVE DOCUMENT NUMBER: 02-04-08-0043**  
**DOCUMENT CONTROL NUMBER: RST-02-F-01653**  
**SUBJECT: OPERABLE UNIT 5 SAMPLING TRIP REPORT**  
**ROBLIN STEEL SITE**  
**DUNKIRK, CHAUTAUQUA COUNTY, NEW YORK**

Dear Mr. Matheis:

Enclosed please find the Sampling Trip Report for the September 2004 sampling at Operable Unit 5 at the Roblin Steel Site located at 320 South Roberts Road, Dunkirk, New York. If you have any questions or comments, please contact me at (732) 225-6116, extension 236.

Sincerely,

WESTON SOLUTIONS, INC.

Carrie Shapiro  
Site Project Manager

Enclosure

cc: TDD File # 02-04-08-0043



## **SAMPLING TRIP REPORT**

**SITE NAME:** Roblin Steel Site  
DCN No: RST-02-F-01653  
TDD No: 02-04-08-0043

**EPA SITE ID NO.:** AP

**SITE LOCATION:** Roblin Steel Site  
320 South Roberts Road  
Dunkirk, New York (Figure 1)

**SAMPLING DATE:** September 7, 2004

### **1.0 SITE DESCRIPTION**

The Roblin Steel site is located at 320 South Roberts Road in Dunkirk, NY (Figure 1). The Site was originally developed as a locomotive manufacturing facility by the American Locomotive Company (ALCO). Locomotives were manufactured at the facility from 1910 to 1930 at which time the facility was converted to manufacture process plant equipment. During and after World War II, the plant was extended to include the manufacturing of military equipment. Historic site plans indicate that three above ground fuel oil storage and three pickling tanks were located on the site at one time. The plans also indicated that the plant was used for the application of corrosion preventive coatings to municipal water pipes and fabrication of missiles until its closure in 1962. The plant was purchased by Progress Park in 1963.

In 1969, the property was acquired by Roblin Steel. From 1969 until 1987, the plant was operated by Roblin Steel as a steel reclamation facility. Processes used to reclaim the steel generated emissions control dust (K061), which is listed as a Resource Conservation and Recovery Act (RCRA) hazardous waste. After the facility shut down, a salvage company was contracted to remove the equipment from the plant. In 1990, the property was acquired by MRDI, which continued the salvage process, and began to demolish the plant. During this time, environmental investigations began at the plant.

Under the Site Investigation/Remedial Alternatives Report (SI/RAR) developed by Chautauqua County, the EPA identified three operable units (OUs) (Attachment A). The OUs were designated OU-3A, OU-3B, and OU-5. Area OU-5 contains elevated levels of PCBs in debris and soil. Areas OU-3A and OU-3B are contaminated with K061, containing elevated levels of lead. In September of 1993, EPA initiated its first clean-up. During this action, drums of waste materials and K061 contaminated soils were removed from the site. A second action in January 1994 allowed for the removal of additional wastes found onsite. In addition to the OUs, a small amount of suspected asbestos was removed from the building. PCB-containing light ballasts and mercury vapor lamps were also removed from the main building.

## 1.1 SITE ACTIVITIES

All sampling activities presented herein detail Operable Unit 5. On August 9, 2004, The EPA On-Scene Coordinator (OSC), The Emergency Rapid Response Service Cleanup Contractor WRS, and the Removal Support Team (RST) conducted a site walk-through, during which the three operable units (OUs), 3A, 3B, and 5 were identified. On August 18, the OSC, RST and WRS returned to the site to begin the mercury vapor lamp removal. During initial site activities, RST conducted cleanup contractor oversight, provided documentation support, and performed particulate air monitoring.

- Operable Unit 5 formerly functioned as a transformer pad during Roblin Steel operations, making PCBs the contaminant of concern. The concrete pad, which was approximately 3 - 4 feet thick could not be excavated. The soil around the pad was excavated to about 3 - 4 feet deep, and stock piled along the western edge of OU-5. Upon excavation of the northern perimeter, a sump that contained water was discovered.

Due to the nature of the operable unit after excavation, and its size (approximately 1330 ft<sup>2</sup>), a grid system was not utilized. Instead, various sample media were collected to obtain representative analytical data. One composite sediment sample was collected from the floor of the sump. A total of seven soil samples were collected: two composites from the stock pile of excavated soil, four from various locations throughout the excavation pit, and one on the northern edge of the operable unit. Two additional samples scraped from the concrete pad were also collected for analysis. All samples were analyzed by a laboratory for Target Compound List (TCL) PCBs.

## 2.0 SAMPLING

### 2.1 SAMPLE DESCRIPTIONS REFER TO TABLE 1

### 2.2 LABORATORY RECEIVING SAMPLES

<u>Sample Type</u>	<u>Name &amp; Address of Laboratory</u>	<u>Parameters</u>
Soil / Cement Chips	Paradigm Environmental 179 Lake Avenue Rochester, New York	TCL PCBs

## 2.3 SAMPLE DISPATCH DATA

On September 7, 2004, seven soil samples, one sediment sample, and two cement chip samples were picked-up by a Paradigm Environmental Services courier for transport to Paradigm's laboratory in Rochester, NY for TCL PCB analysis. (Refer to Table 1 and Appendix B)

All samples were packed in coolers on ice. Custody of all samples was relinquished by RST to WRS prior to pick-up by Paradigm's courier.

## 2.4 ON-SITE PERSONNEL

<u>Name</u>	<u>Representing</u>	<u>Duties on Site</u>
Kevin Matheis	EPA-Region II	On-Scene Coordinator
Scott Soden	WRS	Response Manager
Todd J. Kast	RST - Region II	Site Project Manager, Sample Collection, Sample Management
Carrie Shapiro	RST - Region II	Site Health and Safety Coordinator, Sample Collection

## 2.5 ADDITIONAL COMMENTS

Due to the flooding of OU-5, the sample locations could not be located using GPS, only the perimeter of the area was logged. However, sample locations were photo-documented (see Appendix A).

**Figures -** Figure 1: Site Location Map - Roblin Steel Site  
Figure 2: Site Map - Roblin Steel Site  
Figure 3: Operable Unit 5 - Location Map

**Table 1 -** Sample Descriptions

**Appendix A** - Photo-documentation of Sample Location

**Appendix B** - Preliminary Analytical Data

**Appendix C** - Chain of Custody and Laboratory Notification Forms

Report prepared by: Carrie G. Shapiro  
Carrie Shapiro  
RST Site Project Manager

Date: 11/29/04

Report reviewed by: Christoph Stannik  
Christoph Stannik  
RST Group Leader

Date: 11/30/2004

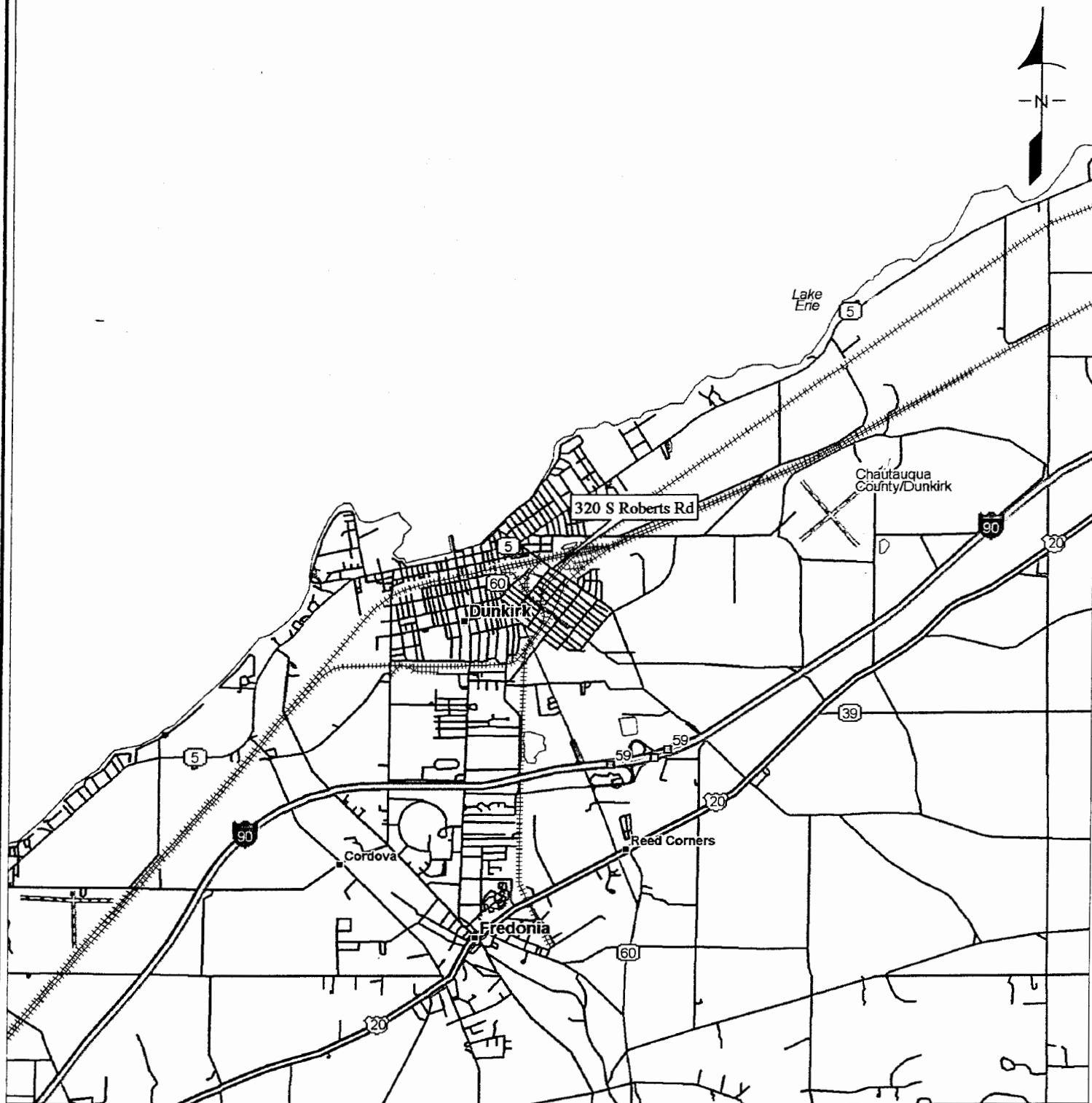
**TABLE 1**

**Operable Unit 5**  
**Sample Descriptions**

Sample Date	Sample ID	Location	Depth	Analysis	Comments
7-Sep-04	OU-5-1C	OU-5	Surface	TCL PCB	Composite of Excavated Soil
7-Sep-04	OU-5-2C	OU-5	Surface	TCL PCB	Composite of Excavated Soil
7-Sep-04	OU-5-3	OU-5	Surface	TCL PCB	Soil
7-Sep-04	OU-5-4S	OU-5	Floor	TCL PCB	Sediment
7-Sep-04	OU-5-5	OU-5	Surface	TCL PCB	Soil
7-Sep-04	OU-5-6	OU-5	Surface	TCL PCB	Soil
7-Sep-04	OU-5-7	OU-5	Floor	TCL PCB	Soil
7-Sep-04	OU-5-8	OU-5	Surface	TCL PCB	MS/MSD
7-Sep-04	OU-5-9	OU-5	Surface	TCL PCB	Concrete chip
7-Sep-04	OU-5-10	OU-5	Surface	TCL PCB	Duplicate of OU-5-9

Samples noted as being from the floor were collected from the bottom of the pit after the soil around the pad was excavated.

**FIGURE 1**  
**Site Location Map**



**FIGURE 1  
SITE LOCATION MAP  
ROBLIN STEEL  
DUNKIRK, NY**

**US ENVIRONMENTAL PROTECTION AGENCY**

REMOVAL SUPPORT TEAM  
CONTRACT # 68-W-00-113

EDITED BY: W. HENSPPERGER

EPA OSC: K. MATHEJS

SITE PROJECT MANAGER: T. KAST

FILE: D:\DWG\ROBLIN1

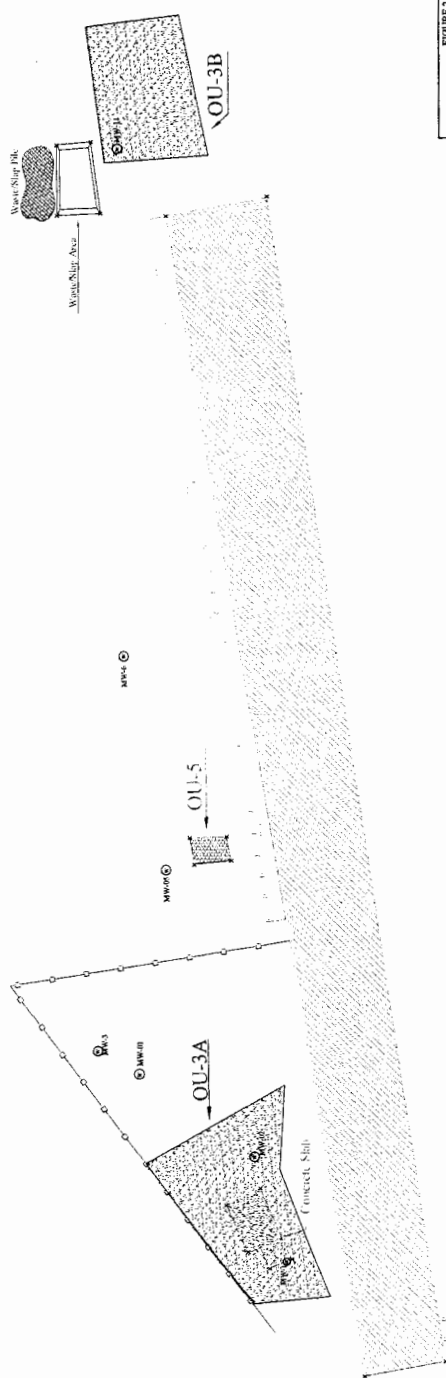
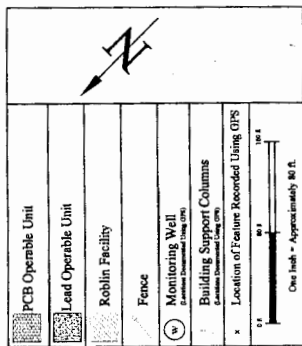


**Weston Solutions Inc.  
FEDERAL PROGRAMS DIVISION**

IN ASSOCIATION WITH SCIENTIFIC ENVIRONMENTAL ASSOCIATES, INC.  
TERRANEAR TECHNOLOGIES GROUP,  
AND INNOVATIVE TECHNOLOGICAL SOLUTIONS INC.

**FIGURE 2**

**Site Map  
Roblin Steel**



**WESTON**  
INNOVATIVE TECHNOLOGICAL SOLUTIONS, INC.  
SCIENTIFIC AND ENVIRONMENTAL CONSULTANTS, INC.  
AND TRIANGULAR, LLC

Weston Solutions, Inc.  
Federal Programs Division  
10000 West 10th Avenue  
Denver, Colorado 80233  
Phone: 303.751.1000  
Fax: 303.751.1001  
www.westonsolutions.com

**FIGURE 2**  
SITE MAP

ROBLIN STEEL  
320 SOUTH ROBERTS ROAD  
DUNELVA, NEW YORK

US ENVIRONMENTAL PROTECTION AGENCY  
600 NORTH BRIDGES AVENUE  
WASHINGTON, DC 20460  
Phone: 202.556.1000  
Fax: 202.556.1001  
www.epa.gov

## **APPENDIX A**

### **Photo-documentation of Sample Locations**



View of PCB composite sample location OU-5-1C (southern side of debris pile)  
in OU-5 at the Roblin Steel Site.

Tuesday, September 7, 2004



Left arrow points to flag showing PCB sample location OU-5-8 in OU-5. Right arrow points to flag indicating PCB composite sample location OU-5-2C (northern side of debris pile) in OU-5 at the Roblin Steel Site.

Tuesday, September 7, 2004



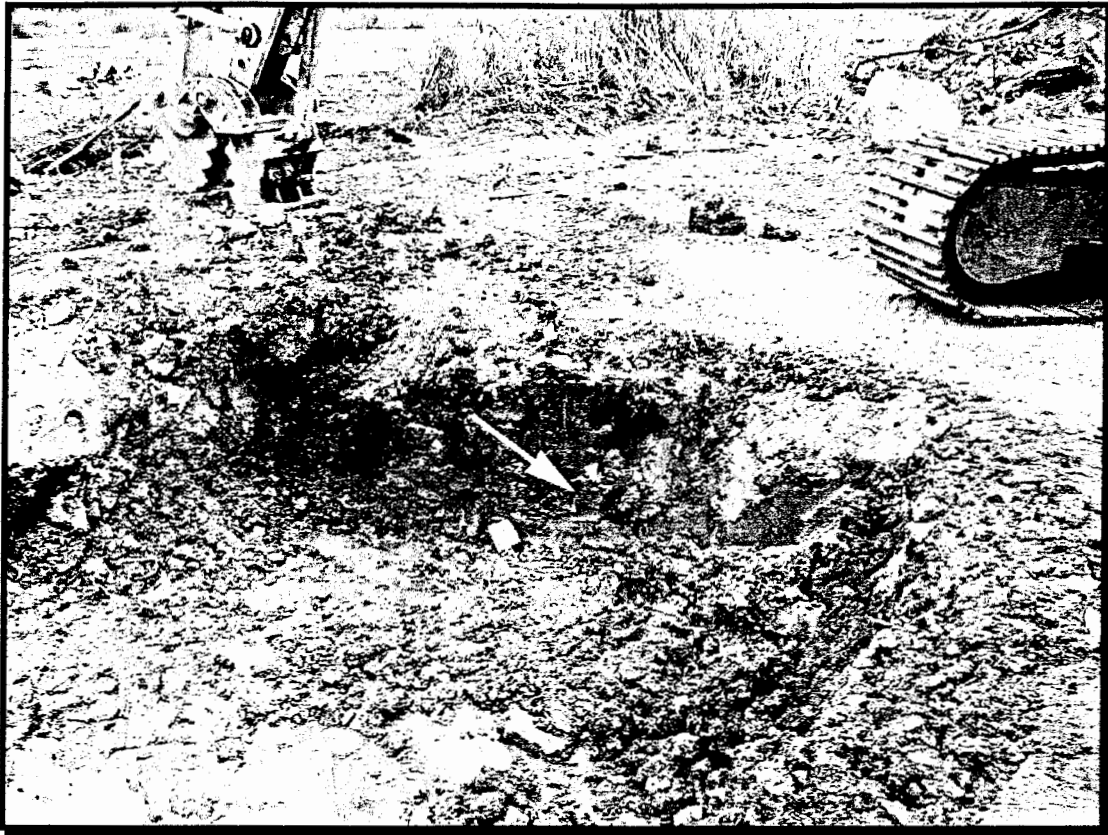
View of PCB sample location OU-5-3 in OU-5 at the Roblin Steel Site.

Tuesday, September 7, 2004



View of PCB sample location OU-5-5 in OU-5 at the Roblin Steel Site.

Tuesday, September 7, 2004



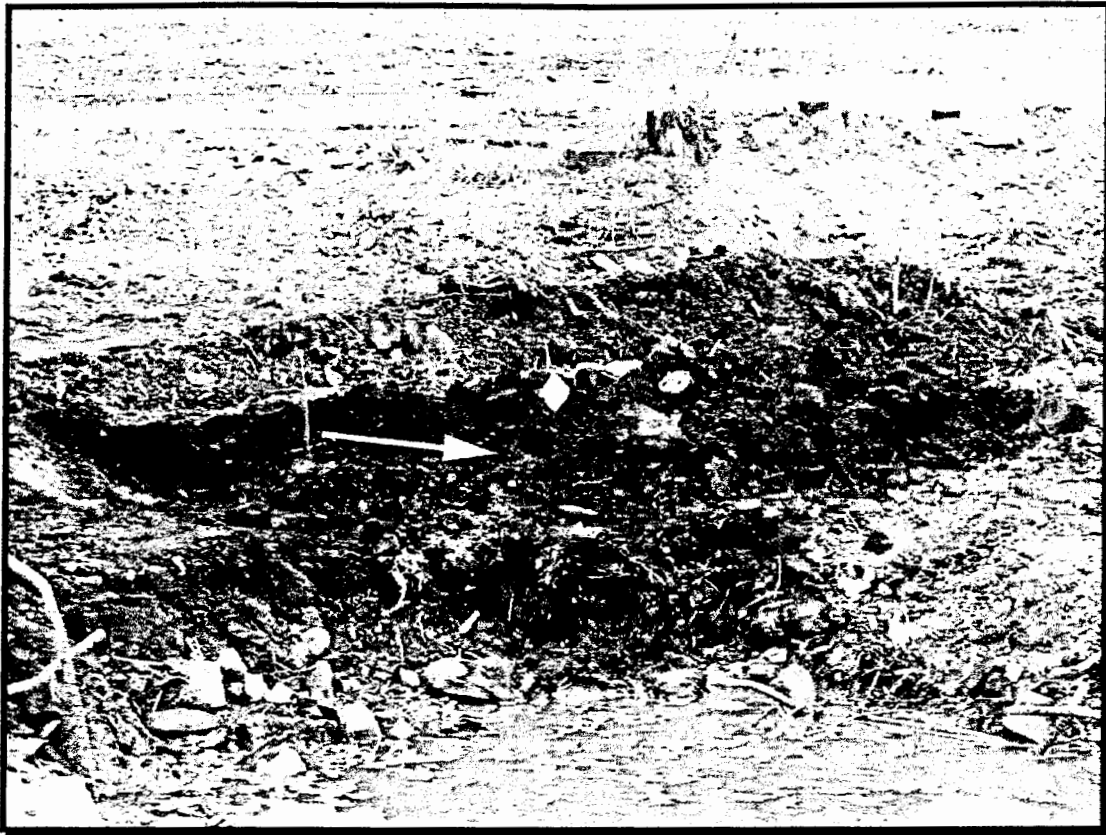
View of PCB sample location OU-5-6 in OU-5 at the Roblin Steel Site.

Tuesday, September 7, 2004



View of PCB sample location OU-5-7 in OU-5 at the Roblin Steel Site.

Tuesday, September 7, 2004



View of PCB sample location OU-5-8 in OU-5 at the Roblin Steel Site.

Tuesday, September 7, 2004

## **APPENDIX B**

### **Preliminary Laboratory Results**

**PCB Analysis Report for Soils/Solids/Sludges**Client: **WRS I&E**

Client Job Site: Roblin Steel

Lab Project Number: 04-2593

Lab Sample Number: 8834

Client Job Number: 504091

Field Location: OU-5-1C

Date Sampled: 9/7/2004

Field ID Number: N/A

Date Received: 9/8/2004

Sample Type: Soil

Date Analyzed: 9/8/2004

**DRAFT**

PCB Identification	Results in mg / Kg
Aroclor 1016	ND< 0.30
Aroclor 1221	ND< 0.30
Aroclor 1232	ND< 0.30
Aroclor 1242	1.2
Aroclor 1248	ND< 0.30
Aroclor 1254	ND< 0.30
Aroclor 1260	ND< 0.30

ELAP Number10145

Method: EPA 8082

ELECTRONIC REPORT FACSIMILE. OFFICIAL REPORT OF ANALYSIS IS THE ORIGINAL SIGNED HARDCOPY.

Comments: ND denotes Non Detect

mg / Kg = milligram per Kilogram

Calculations based upon weight received.

**PCB Analysis Report for Soils/Solids/Sludges**

Client: **WRS I&E**

Client Job Site: Roblin Steel

Lab Project Number: 04-2593

Lab Sample Number: 8835

Client Job Number: 504091

Field Location: OU-5-2C

Field ID Number: N/A

Sample Type: Soil

Date Sampled: 9/7/2004

Date Received: 9/8/2004

Date Analyzed: 9/8/2004

**DRAFT**

PCB Identification	Results in mg / Kg
Aroclor 1016	ND< 0.30
Aroclor 1221	ND< 0.30
Aroclor 1232	ND< 0.30
Aroclor 1242	0.43
Aroclor 1248	ND< 0.30
Aroclor 1254	ND< 0.30
Aroclor 1260	ND< 0.30

ELAP Number10145

Method: EPA 8082

ELECTRONIC REPORT FACSIMILE. OFFICIAL REPORT OF ANALYSIS IS THE ORIGINAL SIGNED HARDCOPY.

Comments: ND denotes Non Detect

mg / Kg = milligram per Kilogram

Calculations based upon weight received.

**PCB Analysis Report for Soils/Solids/Sludges**

Client: **WRS I&E**

Client Job Site: Roblin Steel

Lab Project Number: 04-2593

Lab Sample Number: 8836

Client Job Number: 504091

Field Location: OU-5-3

Date Sampled: 9/7/2004

Field ID Number: N/A

Date Received: 9/8/2004

Sample Type: Soil

Date Analyzed: 9/8/2004

PCB Identification	Results in mg / Kg
Aroclor 1016	ND< 0.30
Aroclor 1221	ND< 0.30
Aroclor 1232	ND< 0.30
Aroclor 1242	ND< 0.30
Aroclor 1248	ND< 0.30
Aroclor 1254	ND< 0.30
Aroclor 1260	ND< 0.30

ELAP Number10145

Method: EPA 8082

**DUPLICATE**

ELECTRONIC REPORT FACSIMILE. OFFICIAL REPORT OF ANALYSIS IS THE ORIGINAL SIGNED HARDCOPY.

Comments: ND denotes Non Detect.

mg / Kg = milligram per Kilogram

Calculations based upon weight received.

**PCB Analysis Report for Soils/Solids/Sludges**Client: **WRS I&E**

Client Job Site: Roblin Steel

Lab Project Number: 04-2593

Client Job Number: 504091

Lab Sample Number: 8837

Field Location: OU-5-4S

Date Sampled: 9/7/2004

Field ID Number: N/A

Date Received: 9/8/2004

Sample Type: Soil

Date Analyzed: 9/8/2004

PCB Identification	Results in mg / Kg
Aroclor 1016	ND< 0.30
Aroclor 1221	ND< 0.30
Aroclor 1232	ND< 0.30
Aroclor 1242	ND< 0.30
Aroclor 1248	ND< 0.30
Aroclor 1254	ND< 0.30
Aroclor 1260	ND< 0.30

ELAP Number10145

Method: EPA 8082

**DRAFT**

ELECTRONIC REPORT FACSIMILE. OFFICIAL REPORT OF ANALYSIS IS THE ORIGINAL SIGNED HARDCOPY.

Comments: ND denotes Non Detect

mg / Kg = milligram per Kilogram

Calculations based upon weight received.

**PCB Analysis Report for Soils/Solids/Sludges**

Client: **WRS I&E**

Client Job Site: Roblin Steel

Lab Project Number: 04-2593

Client Job Number: 504091

Lab Sample Number: 8838

Field Location: OU-5-5

Date Sampled: 9/7/2004

Field ID Number: N/A

Date Received: 9/8/2004

Sample Type: Soil

Date Analyzed: 9/8/2004

PCB Identification	Results in mg / Kg
Aroclor 1016	ND< 0.30
Aroclor 1221	ND< 0.30
Aroclor 1232	ND< 0.30
Aroclor 1242	ND< 0.30
Aroclor 1248	ND< 0.30
Aroclor 1254	ND< 0.30
Aroclor 1260	ND< 0.30

ELAP Number10145

Method: EPA 8082

**DRAFT**

ELECTRONIC REPORT FACSIMILE. OFFICIAL REPORT OF ANALYSIS IS THE ORIGINAL SIGNED HARDCOPY.

Comments: ND denotes Non Detect

mg / Kg = milligram per Kilogram

Calculations based upon weight received.

**PCB Analysis Report for Soils/Solids/Sludges**Client: **WRS I&E**

Client Job Site: Roblin Steel

Lab Project Number: 04-2593

Client Job Number: 504091

Lab Sample Number: 8839

Field Location: OU-5-6

Date Sampled: 9/7/2004

Field ID Number: N/A

Date Received: 9/8/2004

Sample Type: Soil

Date Analyzed: 9/8/2004

PCB Identification	Results in mg / Kg
Aroclor 1016	ND< 0.30
Aroclor 1221	ND< 0.30
Aroclor 1232	ND< 0.30
Aroclor 1242	ND< 0.30
Aroclor 1248	ND< 0.30
Aroclor 1254	ND< 0.30
Aroclor 1260	ND< 0.30

ELAP Number10145

Method: EPA 8082

**DRAFT**

ELECTRONIC REPORT FACSIMILE. OFFICIAL REPORT OF ANALYSIS IS THE ORIGINAL SIGNED HARDCOPY.

Comments: ND denotes Non Detect

mg / Kg = milligram per Kilogram

Calculations based upon weight received.

**PCB Analysis Report for Soils/Solids/Sludges**Client: **WRS I&E**

Client Job Site: Roblin Steel

Lab Project Number: 04-2593

Lab Sample Number: 8840

Client Job Number: 504091

Field Location: OU-5-7

Date Sampled: 9/7/2004

Field ID Number: N/A

Date Received: 9/8/2004

Sample Type: Soil

Date Analyzed: 9/8/2004

PCB Identification	Results in mg / Kg
Aroclor 1016	ND< 0.29
Aroclor 1221	ND< 0.29
Aroclor 1232	ND< 0.29
Aroclor 1242	ND< 0.29
Aroclor 1248	ND< 0.29
Aroclor 1254	ND< 0.29
Aroclor 1260	ND< 0.29

ELAP Number10145

Method: EPA 8082

**DRAFT**

ELECTRONIC REPORT FACSIMILE. OFFICIAL REPORT OF ANALYSIS IS THE ORIGINAL SIGNED HARDCOPY.

Comments: ND denotes Non Detect

mg / Kg = milligram per Kilogram

Calculations based upon weight received.

**PCB Analysis Report for Soils/Solids/Sludges**Client: **WRS I&E**

Client Job Site: Roblin Steel

Lab Project Number: 04-2593

Client Job Number: 504091

Lab Sample Number: 8841

Field Location: OU-5-8

Date Sampled: 9/7/2004

Field ID Number: N/A

Date Received: 9/8/2004

Sample Type: Soil

Date Analyzed: 9/8/2004

PCB Identification	Results in mg / Kg
Aroclor 1016	ND< 0.29
Aroclor 1221	ND< 0.29
Aroclor 1232	ND< 0.29
Aroclor 1242	ND< 0.29
Aroclor 1248	ND< 0.29
Aroclor 1254	ND< 0.29
Aroclor 1260	ND< 0.29

ELAP Number10145

Method: EPA 8082

**DRAFT**

ELECTRONIC REPORT FACSIMILE. OFFICIAL REPORT OF ANALYSIS IS THE ORIGINAL SIGNED HARDCOPY.

Comments: ND denotes Non Detect

mg / Kg = milligram per Kilogram

Calculations based upon weight received.

**PCB Analysis Report for Soils/Solids/Sludges**Client: WRS I&E

Client Job Site: Roblin Steel

Lab Project Number: 04-2593

Client Job Number: 504091

Lab Sample Number: 8842

Field Location: OU-5-9

Date Sampled: 9/7/2004

Field ID Number: N/A

Date Received: 9/8/2004

Sample Type: Soil

Date Analyzed: 9/8/2004

PCB Identification	Results in mg / Kg
Aroclor 1016	ND< 0.29
Aroclor 1221	ND< 0.29
Aroclor 1232	ND< 0.29
Aroclor 1242	1.9
Aroclor 1248	ND< 0.29
Aroclor 1254	ND< 0.29
Aroclor 1260	ND< 0.29

ELAP Number 10145

Method: EPA 8082

**RAFT**

ELECTRONIC REPORT FACSIMILE. OFFICIAL REPORT OF ANALYSIS IS THE ORIGINAL SIGNED HARDCOPY.

Comments: ND denotes Non Detect.

mg / Kg = milligram per Kilogram

Calculations based upon weight received.

**PCB Analysis Report for Soils/Solids/Sludges**

**Client:** WRS I&E

**Client Job Site:** Roblin Steel

**Lab Project Number:** 04-2593

**Lab Sample Number:** 8843

**Client Job Number:** 504091

**Field Location:** OU-5-10

**Date Sampled:** 9/7/2004

**Field ID Number:** N/A

**Date Received:** 9/8/2004

**Sample Type:** Soil

**Date Analyzed:** 9/8/2004

PCB Identification	Results in mg / Kg
Aroclor 1016	ND< 3.0
Aroclor 1221	ND< 3.0
Aroclor 1232	ND< 3.0
Aroclor 1242	17
Aroclor 1248	ND< 3.0
Aroclor 1254	ND< 3.0
Aroclor 1260	ND< 3.0

ELAP Number10145

Method: EPA 8082

**DRAFT**

ELECTRONIC REPORT FACSIMILE. OFFICIAL REPORT OF ANALYSIS IS THE ORIGINAL SIGNED HARDCOPY.

Comments: ND denotes Non Detect

mg / Kg = milligram per Kilogram

Calculations based upon weight received.

## **APPENDIX C**

### **Chain of Custody Records Notice to Laboratory Personnel Forms**

# PARADIGM ENVIRONMENTAL SERVICES, INC.

179 Lake Avenue  
Rochester, NY 14608  
(585) 647-2530 • (800) 724-1997  
FAX: (585) 647-3311

## CHAIN OF CUSTODY

REPORT TO:		INVOICE TO:	
COMPANY: WRS I & E	ADDRESS: 100 MAPLE ROAD	COMPANY: WRS I & E	ADDRESS: 221 Hobbs St. Suite 108
CITY: WILLIAMSVILLE	STATE: NY	CITY: TAMPA	STATE: FL
ZIP: 14221	ZIP: 14221	ZIP: 33619	ZIP: 33619
PHONE: 315-427-5196	FAX: 315-427-5196	PHONE: 315-427-5196	FAX: 315-427-5196
ATTN: SCOTT SODEN	ATTN: SCOTT SODEN	ATTN: SCOTT SODEN	ATTN: SCOTT SODEN
PROJECT NAME/SITE NAME:		CLIENT PROJECT #:	
ROBIN STEEL		504091	
COMMENTS: SEND RESULTS TO: ssoden@wrsie.com		TURNAROUND TIME: (WORKING DAYS)	
		1 2 3 5	
		STD OTHER	

DATE	TIME	COMPOSITE	GRA B	SAMPLE LOCATION/FIELD ID	MATRIX	CONTAMINANTS	REMARKS	PARADIGM LAB SAMPLE NUMBER
1 9/7/04	1415	X		OU-5-1C	soil	1	X	
2	1424	X		OU-5-2C	soil	1	X	
3	1436		X	OU-5-3	soil	1	X	
4	1434	X		OU-5-4S	Sed.	1	X	
5	1441		X	OU-5-5	soil	1	X	
6	1443		X	OU-5-6	soil	1	X	
7	1455		X	OU-5-7	soil	1	X	
8	1457		X	OU-5-8 MS/MSD	soil	1	X	MS/MSD
9	1515		X	OU-5-9	chip	1	X	
10	1520		X	OU-5-10	chip	1	X	

\*\*LAB USE ONLY\*\*

SAMPLE CONDITION: Check box if acceptable or note deviation:	CONTAINER TYPE:	PRESERVATIONS:	HOLDING TIME:	TEMPERATURE:
--	-----------------	----------------	---------------	--------------

Sampled By: Todd J. East	Date/Time: 9/7/04	Relinquished By: [Signature]	Date/Time: 9/7/04 16:15	Total Cost:
Relinquished By: [Signature]	Date/Time: 9/7/04 16:15	Received By: [Signature]	Date/Time: 9/7/04 16:15	P.I.F.

# Precautionary Measures Against Hidden Hazards in Laboratory Samples

## Notice to Laboratory Personnel

### Background

Under the authority of Section 104 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA or Superfund) of 1980, Section 311 of the Clean Water Act, and Subtitle I of the Resource Conservation and Recovery Act (RCRA), EPA has been delegated the responsibility to undertake response actions with respect to the release or potential release of oil, petroleum, or hazardous substances that pose a substantial threat to human health or welfare, or the environment. In addition, EPA provides technical assistance to help mitigate endangerment of the public health, welfare or environment during other emergencies and natural disasters.

EPA's successful implementation of these emergency response action responsibilities requires that technical support capabilities be provided in the form of a contracted Superfund Technical Assessment and Response Team (START) for each EPA Region. The WESTON START Contract 68-W5-0019 provides support to EPA Region II.

### Hazard Communication

The samples which accompany this notice have been shipped to your laboratory for analysis in accordance with applicable D.O.T. or IATA Regulations and were collected by the WESTON START and were tentatively designated by the field response team as either environmental or hazardous material samples.

In general, *Environmental Samples* are collected from streams, farm ponds, small lakes, wells, and off-site soils that are not reasonably expected to be contaminated with hazardous materials. Samples of on-site soils or water, and materials collected from drums, bulk storage tanks, obviously contaminated ponds, impoundments, lagoons, pools, and leachates from hazardous waste sites are considered *Hazardous Samples*. Samples which are obtained from a known radioactive material contamination site or which demonstrate beta or gamma activity greater than three times average background as scanned with a Geiger-Mueller radiation survey meter are considered *Radioactive Samples*.

The samples which accompany this notice have been tentatively classified by the field response team as:

\_\_\_ Environmental \_\_\_ Hazardous X Comb. (Envir. & Haz.) \_\_\_ Radioactive

The field team which collected the samples used the following Level(s) of personal protection as designated by EPA and OSHA conventions to provide protection against possible radiological or chemical exposure:

\_\_\_ Level A \_\_\_ Level B \_\_\_ Level C X Level D

*Modified Tyvek & Nitrile Glove*  
This information is intended for use as a guide for the safe handling of these laboratory samples in accordance with EPA and OSHA regulations. The sample classification(s) and Levels of personal protection used by the WESTON START are not represented to be, nor are they adequate or applicable in all situations, nor are they intended to serve as substitutes for professional/personal judgement.

This form was prepared by: Todd Kast Date 9/17/04

\_\_\_\_\_  
Date 1/1/

Laboratory Name: Paradigm Environmental

/Hazcom for Laboratory Personnel/ To be attached to each Chain-of-Custody Form