



ARM Group Inc.

Earth Resource Engineers and Consultants

December 22, 2016

Mr. James Calenda
Project Manager
EnviroAnalytics Group (EAG)
1600 Sparrows Point Blvd.
Sparrows Point, Maryland

Re: Delineation and Excavation of PCB and
DRO Impacted Soil
Parcel B22 - Tradepoint Atlantic
Sparrows Point, Maryland
ARM Project 160443M-5

Dear Mr. Calenda:

Several locations were identified with exceedances of relevant screening criteria in soil for polychlorinated biphenyls (PCBs) and Diesel Range Organics (DRO) following the Parcel B22 Phase II Investigation at the Tradepoint Atlantic property. The locations of the soil screening criteria exceedances are indicated on **Figure 1**, which also shows the proposed development and environmental capping plan for Parcel B22 (Phase 1). The soil samples from the Phase II Investigation with PCB exceedances included B22-028-SB-1 (74.4 mg/kg) and B22-065-SB-1 (61 mg/kg). The soil samples with elevated DRO detections included B22-162-SB-1 (39,100 mg/kg), B22-163-SB-5 (8,400 mg/kg), B22-070-SB-1 (6,620 mg/kg), B22-148-SB-6 (6,670 mg/kg), and B22-152-SB-6 (6,610 mg/kg). Due to these exceedances, additional delineation and remedial excavation and off-site disposal of impacted material are required prior to the start of redevelopment activities. Per the *Response and Development Work Plan – Revision 3* dated October 7, 2016, soil samples were collected subsequent to excavation activities from each side wall (unless limited by concrete), as well as from the bottom of the excavation, at a minimum of one sample for every 2,000 square feet to confirm when all soils exceeding the soil screening criteria had been removed. If the excavation was limited, laterally or vertically, by concrete, the concrete was cleared of soil and visually inspected for evidence of oil staining.

This document provides a summary of delineation, excavation, and confirmation soil sampling for the required remedial actions. Associated information regarding the disposition of excavated

materials, and the required air monitoring during remedial actions, is also included. Contractors for delineation and excavation included Enterprise Network Resolutions Contracting, LLC (ENR), MCM Management Corp. (MCM), and GSI Mid-Atlantic Inc. (GSI). A photograph log for all of the excavation activities for PCB and DRO impacted soils in Parcel B22 is provided as **Attachment 1**.

Confirmation soil samples were submitted to Pace Analytical Services, Inc. (PACE) and analyzed for PCBs using USEPA Method 8082 or DRO using USEPA Method 8015B, as applicable. Sample containers, preservatives, and holding times for the sample analyses are listed in the Quality Assurance Project Plan (QAPP) Worksheet 19 & 30 – Sample Containers, Preservation, and Holding Times. Laboratory reports for confirmation samples are included as electronic attachments.

PCB Remedial Excavations

Delineation Procedure

Delineation activities associated with previously identified elevated PCB impacts were conducted between August 3 and August 29, 2016 for locations B22-028-SB and B22-065-SB. Following the identification of all utilities in the study area, continuous core soil samples were collected at designated distances (see below) from the location of each soil boring with a track-mounted Geoprobe® direct push rig. At each location, soil samples were collected at 1-foot intervals from 0-5 feet below ground surface (bgs). The samples from 0-1 foot bgs and 4-5 feet bgs were analyzed initially. The remaining intervals (1-2, 2-3, and 3-4 feet bgs) were analyzed if the shallow (0-1 feet bgs) and/or intermediate (4-5 feet bgs) soil samples had PCB concentrations greater than 50 mg/kg. After sampling had been concluded at a location, each hole was backfilled with bentonite chips and all down-hole soil sampling equipment was decontaminated in accordance with the procedures and methods referenced in Field SOP Number 016 provided in Appendix A of the QAPP.

B22-028-SB Delineation

The first round of delineation borings was completed on August 5, 2016 and was based on a grid with 25-foot spacing centered on the elevated PCB detection associated with B22-028-SB (**Figure 2**). During the field investigation, expansive sections of thick, reinforced concrete were encountered in several areas. Multiple attempts were made to collect soil samples from 0-5 feet bgs in the concrete covered locations; however, equipment refusal prevented these samples from being collected. Only samples located on the western side of the B22-028-SB delineation area were able to be collected, and therefore, only eight of the 16 proposed PCB delineation borings were completed within the delineation area. The successful delineation borings were completed to a total depth of 5 feet bgs. **Table 1** presents the results of the total PCB concentrations reported by the laboratory. Three new exceedances of the screening criteria were reported in the shallow soil samples collected from an historic courtyard to the west of B22-028-SB (B22-028C-SB-1, B22-028E-SB-1, and B22-028H-SB-1). Based on the additional detections at the edge of the delineation grid in excess of the screening criteria of 50 mg/kg, further assessment for PCBs was necessary in the vicinity of B22-028-SB.

On August 29, 2016, nine additional delineation borings were completed with a spacing of approximately 20 feet in areas with exposed soil present north and south of the courtyard to confirm the horizontal extent of elevated PCB impacts. Identical sampling procedures were used with this supplemental round of delineation sampling. Only B22-028O-SB-1, which was collected from in an isolated location bounded by concrete, had PCB concentrations above 50 mg/kg. This additional analytical data is presented in **Table 1**.

B22-065-SB Delineation

The first round of delineation borings was completed on August 3 and August 4, 2016. The delineation was based on a grid with 25-foot spacing around boring B22-065-SB (**Figure 3**). Analytical data from B22-064-SB, which is directly to the north of B22-065-SB, indicated that PCB concentrations were below the screening criteria of 50 mg/kg, and therefore, the grid was shifted to provide more extensive coverage to the south. Delineation borings were completed to a total depth of 5 feet bgs in accordance with the approved delineation procedure. **Table 2** presents the results of the total PCB concentrations reported by the laboratory for the delineation borings associated with B22-065-SB. No exceedances of the screening criteria at any depth (with the exception of the initial Phase II Investigation sample B22-065-SB-1) were observed in the first round of delineation borings; therefore, a second round of delineation borings was completed to define the horizontal extent of the potential PCB impacts around B22-065-SB.

On August 29, 2016, four additional delineation borings were completed with 10-foot spacing centered on B22-065-SB (**Figure 3**). Identical sampling procedures were used with this supplemental round of delineation sampling. This additional analytical data is also included in **Table 2**. Again, no exceedances of the screening criteria were observed at any depth in the second round of delineation borings; therefore, the lateral extents of possible PCB impacts were established for excavation.

B22-028-SB Excavation

The proposed excavation was designed to encompass the removal of all accessible impacted soil with PCB concentrations in excess of 50 mg/kg identified in the 0-1 foot bgs interval. The following excavations were completed: B22-028 Main, B22-028 South, and B22-028 East. These excavation areas, along with the locations of the PCB delineation soil borings, are included in **Figure 2**.

On September 15, 2016, the B22-028 Main excavation was completed to a depth of two feet bgs in order to ensure all PCB impacted material was removed from the historic open courtyard. During excavation activities, a concrete trench drain that ran along the east wall of the excavation was uncovered. The trench drain extended from the north and south walls of the excavation to a drop inlet located in the middle of the excavation. The drop inlet was approximately 12 feet deep with a discharge pipe located at the bottom that appeared to run to the north toward a Tin Mill Canal outfall. Also during excavation activities, heavily stained and black-colored material was encountered adjacent to the drop inlet that extended to the western excavation wall. Material was excavated from a 10 x 11 foot impacted area (located within the original excavation area) until all of the heavily stained material was removed and non-impacted material was encountered. The observed soil impacts resulted in the removal of an additional 3

feet of material from within the 10 x 11 foot area. In total, approximately 162 cubic yards of impacted soil and concrete were excavated from B22-028 Main and stockpiled in a designated area located southeast of the excavation.

Upon completion of the excavation, a total of three confirmation soil samples were collected throughout the excavation from both the bottom and sidewalls of the excavation. Of the three confirmation samples, a grab sample was collected from the north sidewall while one composite sample was collected from the bottom of the excavation, and one composite sample was collected from the east sidewall. All sidewall samples were collected from approximately 1 foot below grade. No confirmation samples were collected along the south and west walls because these walls were entirely comprised of concrete. In lieu of collecting a concrete sample, a visual inspection of each concrete wall was completed, which indicated no potential PCB impacts and/or staining. PCB concentrations in excess of 50 mg/kg were not identified in any of the confirmation soil samples.

The B22-028 South and B22-028 East excavations, the extents of which were bounded by concrete, were completed on September 15, 2016. The B22-028 East excavation was centered on B22-028-SB, and the B22-028 South excavation was centered on B22-028O-SB (**Figure 2**). The vertical extent of each excavation was limited to two feet bgs as the PCB concentrations in excess of 50 mg/kg were limited to previously collected 0-1 foot bgs samples. Approximately 2.5 cubic yards of impacted material was removed from each excavation, yielding a total of 5 cubic yards for the B22-028 South and B22-028 East excavations. Once the excavations were completed, the sidewalls were identified as concrete; therefore, the walls were visually inspected, and no evidence of PCB impacts and/or staining was observed. A bottom confirmation sample was collected from each of these excavations.

The concentration of PCBs identified in the bottom soil confirmation sample from the B22-028 East excavation did not exceed 50 mg/kg, while the bottom soil confirmation sample from the B22-028 South excavation had a concentration PCBs of 54.9 mg/kg. Due to this exceedance, approximately 0.5 cubic yards of additional soil was removed on October 4, 2016 to an approximate depth of three feet bgs where potential PCB stained concrete was encountered. A jackhammer attachment was used to break up the concrete in order to collect a sample of the concrete for laboratory analysis. The concrete sample had a PCB concentration of 1 mg/kg (J-flagged). The analytical results from the confirmation soil samples are presented in **Table 3**.

B22-065-SB Excavation

On September 15, 2016, the B22-065 excavation was completed to 2 feet bgs in order to ensure all PCB impacted material was removed. An excavator equipped with a jackhammer attachment was required to break up the concrete slab at grade. Once the concrete was broken up, concrete

and soil potentially impacted by PCBs were removed from the excavation. No PCB impacts and/or staining were observed during the excavation activities. Approximately 7.4 cubic yards of impacted material were removed from this excavation.

Upon completion of the excavation, a total of five confirmation soil samples were collected throughout the excavation from both the bottom and sidewalls of the excavation. A grab sample was collected from the bottom and each of the four sidewalls. All sidewall samples were collected from approximately 1 foot below grade. None of the confirmation soil samples contained PCB concentrations in excess of 50 mg/kg. The excavation boundary and locations of confirmation samples, along with the locations of the PCB delineation soil borings, are included on **Figure 3**. The analytical results from the confirmation soil samples are presented in **Table 3**.

Excavated Material Handling and Disposal

The designated staging area for PCB impacted materials consisted of two stockpile locations, one for soil and one for concrete. Both of the stockpiles were underlain with a polyethylene layer on the ground surface, with multiple straw-bales used as berms, and covered with a polyethylene layer and weighted down. Two composite samples (one soil and one concrete) were collected using materials from multiple locations throughout each stockpile and submitted for TCLP analysis to facilitate proper disposal. The laboratory reports have been included as electronic attachments. The excavated PCB impacted soil was loaded into dump trucks for disposal at Wayne Disposal Inc. Site #2 Landfill, Belleville, Michigan. The waste manifests are included as **Attachment 2**.

Air Monitoring

In accordance with the Parcel B22 Response and Development Work Plan dated August 30, 2016 (the governing document at the time of fieldwork), to limit worker exposure to contaminants borne on dust and windblown particulates, dust control measures were to be implemented if dust concentrations exceeded 3.0 mg/m³. To ensure that this threshold was not exceeded during the PCB excavation activities, a real-time dust meter (ThermoElectron Corporation Personal Data RAM 1000AN) was used to monitor the concentration of dust generated while excavating impacted material. Daily calibration of the real-time dust meter was conducted in accordance with the QAPP to ensure the accuracy of the equipment. Dust concentrations were recorded in the field book by field personnel every 15 minutes during intrusive activities. No dust concentration in exceedance of 3.0 mg/m³ was noted during the PCB excavation activities.

DRO Excavations

Delineation Procedure

Delineation activities were not conducted prior to the initiation of excavation activities for locations identified with elevated concentrations of DRO. Field personnel directed the excavations based on field indicators of contamination including visual observations of staining, olfactory screening (odors), and elevated Photoionization Detector (PID) readings. Soil removal continued until the boundaries and the bottom of the excavation showed no evidence of contamination (unless otherwise noted). Once the excavation boundaries were established, analytical confirmation samples were collected to determine the need for further action.

B22-162-SB and B22-163-SB Excavation

From September 27 through October 10, 2016, each excavation was completed to a depth of nine feet bgs to remove all DRO impacted material associated with soil borings B22-162-SB and B22-163-SB. An excavator equipped with a jackhammer attachment was required to break up the concrete slab at grade. Once the concrete was broken up, the concrete and potential DRO impacted soil was removed from the subsurface. Concrete not visually impacted by DRO was stockpiled adjacent to the excavation. Approximately 675 cubic yards of DRO impacted material were removed during the excavation activities. The excavated DRO impacted soil was loaded into dump trucks for direct hauling to the on-site industrial landfill (Greys Landfill).

During excavation activities, a total of 10 confirmation soil samples were collected throughout the excavation from both the bottom and sidewalls of the excavation. Nine grab samples were collected from the sidewalls at various depths (ranging from 3-8 feet bgs), and one grab sample was collected from the bottom of the excavation. Samples from various depths ranging from 3-8 feet bgs were collected due to field observations and the varying levels (0-1 bgs and 4-5 bgs) of the DRO concentrations exceeding the soil criteria in the Phase II soil borings. None of the confirmation soil samples contained DRO concentrations in excess of 6,200 mg/kg. The extents of the excavation, and the location of each confirmation sample, are included on **Figure 4**. The analytical results from the confirmation soil samples are presented in **Table 4**.

B22-070-SB Excavation

DRO impacted material was excavated from various depths to remove all impacted material from the B22-070-SB location on October 3, October 4, and October 6, 2016. The deepest section of the excavation was nine feet bgs, and a bench was created to approximately three feet bgs adjacent to the northern boundary of the Main Excavation due to a concrete pad encountered near the surface. Minimal impacts were observed along this concrete pad; therefore, there was

no justification to break up the pad and extend the excavation horizontally to the north (beyond the pad) or vertically to ten feet bgs. A Western Excavation was completed beyond an existing concrete pad (the western boundary of the Main Excavation) to confirm the horizontal extent of DRO impacted soil due its presence along the western wall of the Main Excavation to a depth of five feet bgs. This excavation was completed to six feet bgs around the northern and western walls of the existing concrete pad, and no DRO impacted soil was observed. Also, due to the presence of a utility pipe that was encountered along the eastern wall of the Main Excavation area, a confirmation sample could not be collected. A small Eastern Excavation was subsequently completed to facilitate the collection of a confirmation sample to the east. This additional soil removal extended the excavation approximately nine feet beyond the pipe. No physical impacts were observed within the Eastern Excavation. In total, approximately 405 cubic yards of DRO impacted material was removed from the excavations associated with B22-070-SB. The excavated DRO impacted soil was loaded into dump trucks for direct hauling to the on-site industrial landfill (Greys Landfill).

Upon completion of the excavation, a total of five confirmation soil samples were collected throughout the excavation from both the bottom and sidewalls of the excavation. Two grab samples were collected from the bottom and a single grab sample was collected from each sidewall (north, east, and west). Due to the complexity of the former building slab, a south sidewall confirmation sample was not able to be collected; all other sidewall samples were collected from between 4 and 6 feet bgs. None of the confirmation soil samples contained DRO concentrations in excess of 6,200 mg/kg. The extents of the excavation and the locations of confirmation samples are included on **Figure 5**. The analytical results from the confirmation soil samples are presented in **Table 4**.

B22-148-SB Excavation

DRO impacted material was excavated from 9.5 feet bgs to remove all impacted material from the B22-148 location on October 4, 2016. An excavator equipped with a jackhammer attachment was required to break up slag and a trench drain located at the northwest corner of the excavation. Impacted material was removed once the slag and concrete were broken up. Approximately 282 cubic yards of DRO impacted material were removed from this excavation. Note that this excavation was completed in a “U” shape around a concrete pad in the vicinity of soil boring B22-148-SB.

Upon completion of the excavation, a total of six confirmation soil samples were collected throughout the excavation from both the bottom and sidewalls of the excavation. Three grab samples were collected from the bottom, and a single grab sample was collected from each exterior sidewall (north, east, and west). All sidewall samples were collected from a depth of approximately 6 feet bgs. None of the confirmation soil samples contained DRO concentrations

in excess of 6,200 mg/kg. The extents of the excavation and the locations of confirmation samples are included on **Figure 6**. The analytical results from the confirmation soil samples are presented in **Table 4**.

B22-152-SB Excavation

DRO impacted material was excavated from nine feet bgs to remove all impacted material from the B22-152 location on September 4 to 12, 2016. An excavator equipped with a jackhammer attachment was required to break up a reinforced concrete pad and slag throughout the entire excavation. A soil berm located around the perimeter of the excavation was removed, and since no impacts were observed within this material, it was stockpiled adjacent to the excavation. DRO impacts were observed in soil during the excavation. Once the slag and concrete were broken up, the slag and concrete not visually impacted by DRO was stockpiled adjacent to the excavation, and the impacted soil was removed. Based on field observations, the excavation was extended as necessary to ensure the removal of all impacted soil. Approximately 1,720 cubic yards of DRO impacted soil were removed from this excavation and loaded into dump trucks for direct hauling and disposal at the on-site industrial landfill (Greys Landfill).

Upon completion of the excavation, a total of seven confirmation soil samples were collected throughout the excavation from both the bottom and sidewalls of the excavation. Two grab samples were collected from the bottom, and a grab sample was collected from each sidewall (north, south, east, west and the northeast extension). All sidewall samples were collected from 6 feet bgs. None of the confirmation soil samples contained DRO concentrations in excess of 6,200 mg/kg. The extents of the excavation and the locations of confirmation samples are included on **Figure 7**. The analytical results from the confirmation soil samples are presented in **Table 4**.

Excavated Material Handling and Disposal

The excavated DRO impacted soil was loaded into dump trucks for direct hauling to the on-site industrial landfill (Greys Landfill).

Air Monitoring

In accordance with the Parcel B22 Response and Development Work Plan dated August 30, 2016 (the governing document at the time of fieldwork), air monitoring was completed during the DRO excavation activities. A hand-held PID (MiniRae 3000), was utilized to monitor the air for volatile organic compound (VOC) vapors. If sustained vapor concentrations were measured at or above 10 parts per million (ppm) for 15 minutes in the breathing zone, work would have immediately ceased until such time as appropriate action was established. No sustained readings

for VOCs were observed during the DRO excavation activities. Daily calibration of the PID with 100 ppm Isobutylene was completed per the QAPP to ensure accurate readings by the equipment. A field judgment call was made that dust monitoring was not required during the DRO excavation activities because no visual indications of dust were observed by field personnel and most of the soil being excavated was slag or clay material.

If you have any questions or require additional information please do not hesitate to contact the undersigned at 410-290-7775. Thank you very much.

Respectfully Submitted,
ARM Group Inc.



Eric S. Magdar
Senior Geologist

Attachments:

Table 1 – B22-028-SB PCB Analytical Results

Table 2 – B22-065-SB PCB Analytical Results

Table 3 – PCB Confirmation Sample Results

Table 4 – DRO Confirmation Sample Results

Figure 1 – Parcel B22 PCB & DRO Excavation Locations

Figure 2 – B22-028-SB Excavation

Figure 3 – B22-065-SB Excavation

Figure 4 – B22-162-SB & B22-163-SB Excavation

Figure 5 – B22-070-SB Excavation

Figure 6 – B22-148-SB Excavation

Figure 7 – B22-152-SB Excavation

Attachment 1 – Excavation Photograph Log

Attachment 2 – PCB Waste Manifests

Electronic Attachment – PCB Soil Confirmation Sample Laboratory Reports

Electronic Attachment – DRO Soil Confirmation Sample Laboratory Reports

Electronic Attachment – TCLP Sample Laboratory Reports

TABLES

| Table 1 - B22-028-SB PCB Analytical Results | | | | | | | | | |
|--|--------|--------|-------|---|--------|---|--|--------|---|
| Depth (ft) Boring ID | 1 | 2 | 3 | 4 | 5 | | | | |
| B22-028A-SB-1 | 20.8 | | | | | | | | |
| B22-028A-SB-5 | | | | | | | | 0.0723 | |
| B22-028B-SB-1 | 28 | | | | | | | | |
| B22-028B-SB-5 | | | | | | | | 0.277 | |
| B22-028C-SB-1 | 61.9 | | | | | | | | |
| B22-028C-SB-2 | | 0.526 | | | | | | | |
| B22-028C-SB-3 | | | 0.058 | J | | | | | |
| B22-028C-SB-4 | | | | | 0.0562 | U | | | |
| B22-028D-SB-1 | 1.7 | | | | | | | | |
| B22-028D-SB-5 | | | | | | | | 0.0622 | U |
| B22-028E-SB-1 | 203 | | | | | | | | |
| B22-028E-SB-2 | | 2.01 | | | | | | | |
| B22-028E-SB-3 | | | 0.062 | U | | | | | |
| B22-028E-SB-4 | | | | | 0.059 | U | | | |
| B22-028E-SB-5 | | | | | | | | 0.0492 | J |
| B22-028F-SB-1 | 7.27 | | | | | | | | |
| B22-028F-SB-5 | | | | | | | | 0.0603 | U |
| B22-028G-SB-1 | 38 | | | | | | | | |
| B22-028G-SB-5 | | | | | | | | 0.0668 | U |
| B22-028H-SB-1 | 159 | | | | | | | | |
| B22-028H-SB-2 | | 33.2 | | | | | | | |
| B22-028H-SB-3 | | | 0.117 | | | | | | |
| B22-028H-SB-4 | | | | | 0.058 | U | | | |
| B22-028H-SB-5 | | | | | | | | 0.0558 | U |
| B22-028I-SB-1 | 0.758 | | | | | | | | |
| B22-028I-SB-5 | | | | | | | | 0.0532 | U |
| B22-028J-SB-1 | 0.53 | | | | | | | | |
| B22-028J-SB-5 | | | | | | | | 0.055 | U |
| B22-028K-SB-1 | 37.6 | | | | | | | | |
| B22-028K-SB-5 | | | | | | | | 0.0622 | U |
| B22-028L-SB-1 | 0.0553 | U | | | | | | | |
| B22-028L-SB-5 | | | | | | | | 0.0632 | U |
| B22-028M-SB-1 | 4.48 | | | | | | | | |
| B22-028N-SB-1 | 0.0686 | | | | | | | | |
| B22-028O-SB-1 | 311 | | | | | | | | |
| B22-028O-SB-2 | | 0.5726 | | | | | | | |
| B22-028O-SB-3 | | | 0.46 | | | | | | |
| B22-028O-SB-4 | | | | | 0.116 | | | | |
| B22-028O-SB-5 | | | | | | | | 0.121 | |
| B22-028P-SB-1 | 31.9 | | | | | | | | |
| B22-028P-SB-5 | | | | | | | | 0.0917 | |
| B22-028Q-SB-1 | 3.787 | | | | | | | | |
| B22-028Q-SB-5 | | | | | | | | 0.0668 | U |
| B22-028R-SB-1 | 9.94 | | | | | | | | |
| B22-028R-SB-5 | | | | | | | | 0.0623 | U |
| B22-028S-SB-1 | 1.0048 | | | | | | | | |
| B22-028S-SB-5 | | | | | | | | 0.0572 | U |
| B22-028T-SB-1 | 4.887 | | | | | | | | |
| B22-028T-SB-5 | | | | | | | | 0.0576 | U |

Notes:

All reported values are in units of mg/kg.

Red cells indicate PCB exceedance of excavation criteria (50 mg/kg)

U: This analyte was not detected in the sample. The numeric value represents the sample quantitation/detection limit.

J: The positive result reported for this analyte is a quantitative estimate.

**Table 2 - B22-065-SB
PCBs Analytical Results**

| Depth (ft) Boring ID | 0.5 | 1 | 2 | 3 | 4 | 5 |
|-------------------------|--------|--------|--------|--------|-------|--------|
| B22-065D-SB-1 | | 0.4036 | | | | |
| B22-065D-SB-4 | | | | | 0.285 | |
| B22-065E-SB-1 | | 2.4182 | | | | |
| B22-065E-SB-4 | | | | | 0.154 | |
| B22-065F-SB-0.5 | 0.2094 | | | | | |
| B22-065F-SB-1 | | 0.0609 | U | | | |
| B22-065F-SB-2 | | | 0.0582 | U | | |
| B22-065G-SB-1 | | 0.3055 | | | | |
| B22-065G-SB-5 | | | | | | |
| B22-065H-SB-1 | | 0.713 | | | | |
| B22-065H-SB-3 | | | | 0.0712 | U | |
| B22-065I-SB-1 | | 0.0557 | U | | | |
| B22-065I-SB-5 | | | | | | 0.4142 |
| B22-065J-SB-1 | | 0.0604 | U | | | |
| B22-065J-SB-5 | | | | | | 0.0629 |
| B22-065K-SB-1 | | 0.619 | | | | |
| B22-065K-SB-5 | | | | | | 0.0608 |
| B22-065L-SB-1 | | 0.0603 | U | | | |
| B22-065L-SB-5 | | | | | | 0.0655 |
| B22-065M-SB-1 | | 0.0667 | | | | |
| B22-065M-SB-5 | | | | | | 0.0578 |
| B22-065N-SB-1 | | 0.0565 | U | | | |
| B22-065N-SB-5 | | | | | | 0.062 |
| B22-065O-SB-1 | | 0.0588 | U | | | |
| B22-065O-SB-5 | | | | | | 0.0586 |
| B22-065P-SB-1 | | 0.0613 | U | | | |
| B22-065Q-SB-1 | | 0.0615 | U | | | |
| B22-065Q-SB-5 | | | | | | 0.0593 |
| B22-065R-SB-1 | | 0.0606 | U | | | |
| B22-065R-SB-5 | | | | | | 0.0642 |

Notes:

All reported values are in units of mg/kg.

U: This analyte was not detected in the sample. The numeric value represents the sample quantitation/detection limit.

| Table 3 - PCB Confirmation Sample Results | | | | |
|---|-------------|------------|----------------|------|
| Confirmation Sample ID | Sample Date | Analyte | Result (mg/kg) | Flag |
| B22-028 MAIN BOTTOM | 09/15/2016 | Total PCBs | 1.34 | |
| B22-028 MAIN NORTH SIDEWALL | 09/15/2016 | Total PCBs | 32.4 | |
| B22-028 MAIN EAST SIDEWALL | 09/15/2016 | Total PCBs | 47.9 | |
| B22-028 SOUTH EXCAVATION BOTTOM | 09/15/2016 | Total PCBs | 54.9 | |
| B22-028 SOUTH BOTTOM | 10/6/2016 | Total PCBs | 1.0 | J |
| B22-028 EAST EXCAVATION BOTTOM | 09/15/2016 | Total PCBs | 2.73 | |
| B22-065 BOTTOM | 09/15/2016 | Total PCBs | 0.532 | |
| B22-065 SOUTH SIDEWALL | 09/15/2016 | Total PCBs | 0.0603 | U |
| B22-065 NORTH SIDEWALL | 09/15/2016 | Total PCBs | 0.0596 | U |
| B22-065 EAST SIDEWALL | 09/15/2016 | Total PCBs | 0.0708 | U |
| B22-065 WEST SIDEWALL | 09/15/2016 | Total PCBs | 0.0605 | U |

Notes:

Red cells indicate PCB exceedance of excavation criteria (50 mg/kg).

U: This analyte was not detected in the sample. The numeric value represents the sample quantitation/detection limit.

J: Estimated concentration above the adjusted method detection limit and below the adjusted reporting limit.

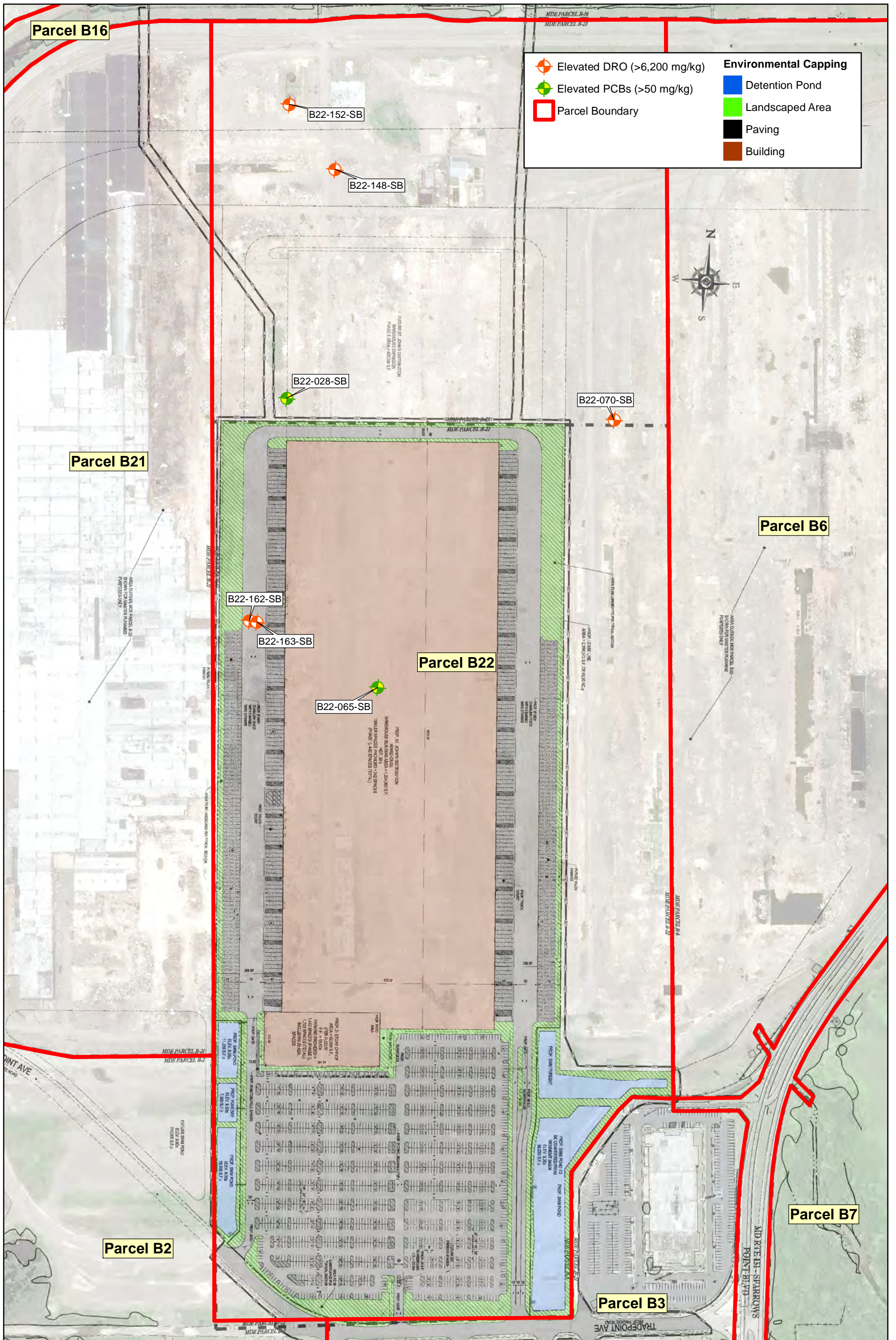
| Table 4 - DRO Confirmation Sample Results | | | | |
|---|-------------|-----------------------|----------------|------|
| Confirmation Sample ID | Sample Date | Analyte | Result (mg/kg) | Flag |
| B22-070A-SB-10 | 10/03/2016 | Diesel Range Organics | 21.8 | |
| B22-070-North Side | 10/04/2016 | Diesel Range Organics | 2 | |
| B22-070-East Side | 10/06/2016 | Diesel Range Organics | 4 | J |
| B22-070-West Bottom | 10/06/2016 | Diesel Range Organics | 5.7 | J |
| B22-070-West Side | 10/06/2016 | Diesel Range Organics | 6.3 | J |
| B22-148 East Bottom | 10/04/2016 | Diesel Range Organics | 519 | |
| B22-148 East Side | 10/04/2016 | Diesel Range Organics | 59.2 | |
| B22-148 North Bottom | 10/04/2016 | Diesel Range Organics | 698 | |
| B22-148 North Wall | 10/04/2016 | Diesel Range Organics | 279 | |
| B22-148 West Bottom | 10/04/2016 | Diesel Range Organics | 526 | |
| B22-148 West Side | 10/04/2016 | Diesel Range Organics | 493 | |
| B22-152-6 E Wall | 10/12/2016 | Diesel Range Organics | 1,700 | |
| B22-152-6 N Wall | 10/12/2016 | Diesel Range Organics | 1,720 | |
| B22-152-6 NE Wall | 10/12/2016 | Diesel Range Organics | 2,060 | |
| B22-152-6 South Wall | 10/07/2016 | Diesel Range Organics | 223 | |
| B22-152-6 West Wall | 10/07/2016 | Diesel Range Organics | 2,690 | |
| B22-152-9 NW Bottom | 10/12/2016 | Diesel Range Organics | 2,690 | |
| B22-152-9 SE Bottom | 10/12/2016 | Diesel Range Organics | 3,150 | |
| B22-162A-SB-6 | 10/03/2016 | Diesel Range Organics | 12 | |
| B22-162B-4 | 09/28/2016 | Diesel Range Organics | 96.6 | |
| B22-162C-4 | 09/28/2016 | Diesel Range Organics | 12.1 | |
| B22-162D-6 | 09/28/2016 | Diesel Range Organics | 290 | |
| B22-162E-8 | 09/28/2016 | Diesel Range Organics | 4.6 | J |
| B22-162F-5 | 09/28/2016 | Diesel Range Organics | 14 | |
| B22-162G-SB-4 | 10/03/2016 | Diesel Range Organics | 4.7 | J |
| B22-162H-SB-5 | 10/03/2016 | Diesel Range Organics | 13.2 | |
| B22-162I-SB-3 | 10/03/2016 | Diesel Range Organics | 3.6 | J |
| B22-163-8.5 Bottom | 10/10/2016 | Diesel Range Organics | 6 | J |

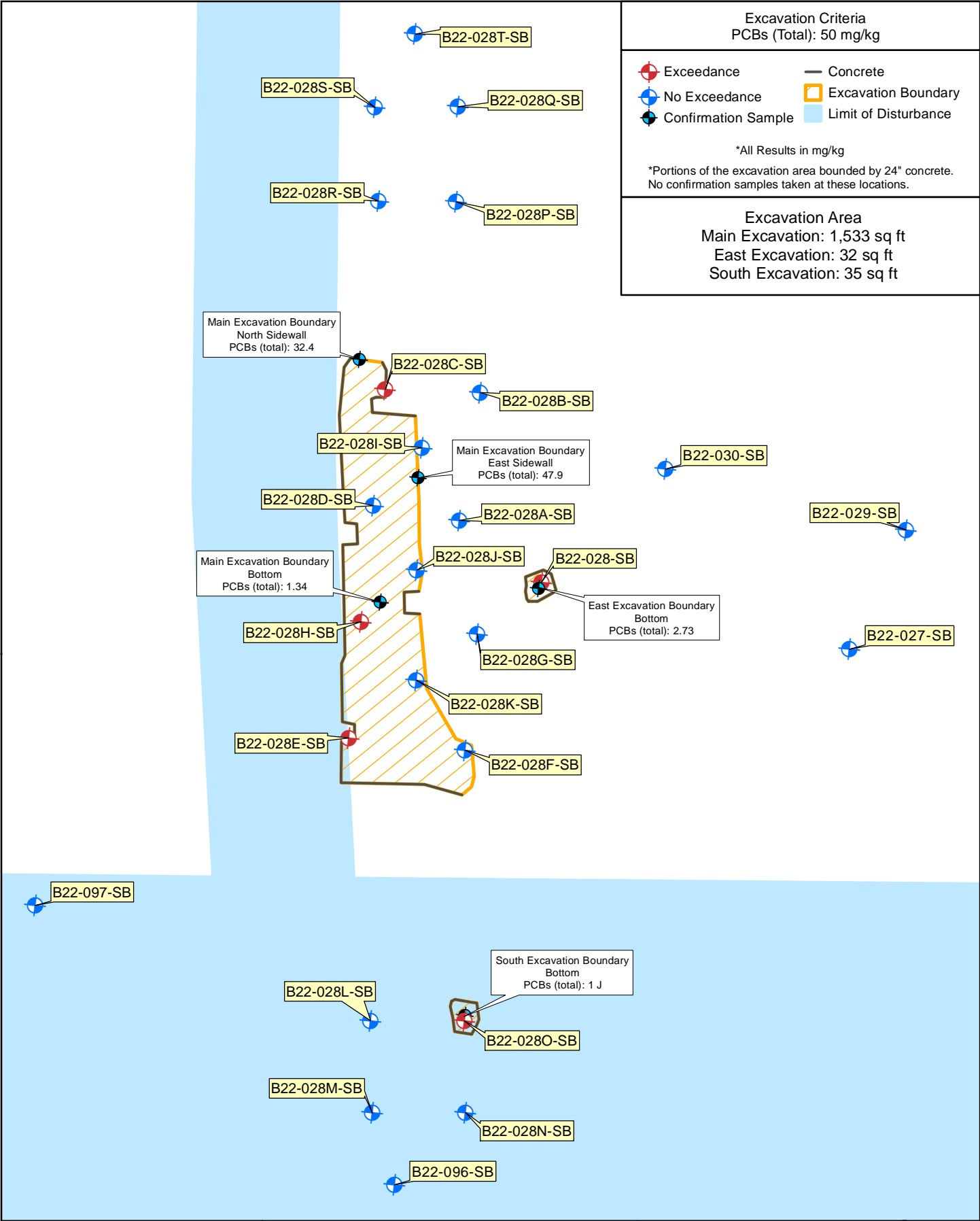
Notes:

U: This analyte was not detected in the sample. The numeric value represents the sample quantitation/detection limit.

J: Estimated concentration above the adjusted method detection limit and below the adjusted reporting limit.

FIGURES





Excavation Criteria
PCBs (Total): 50 mg/kg

| | |
|--|---|
| <ul style="list-style-type: none"> ● Exceedance ● No Exceedance ● Confirmation Sample | <ul style="list-style-type: none"> Concrete Excavation Boundary Limit of Disturbance |
|--|---|

*All Results in mg/kg

*Portions of the excavation area bounded by 24" concrete.
No confirmation samples taken at these locations.

Excavation Area

Main Excavation: 1,533 sq ft
East Excavation: 32 sq ft
South Excavation: 35 sq ft

B22-028-SB Excavation
Aerial View

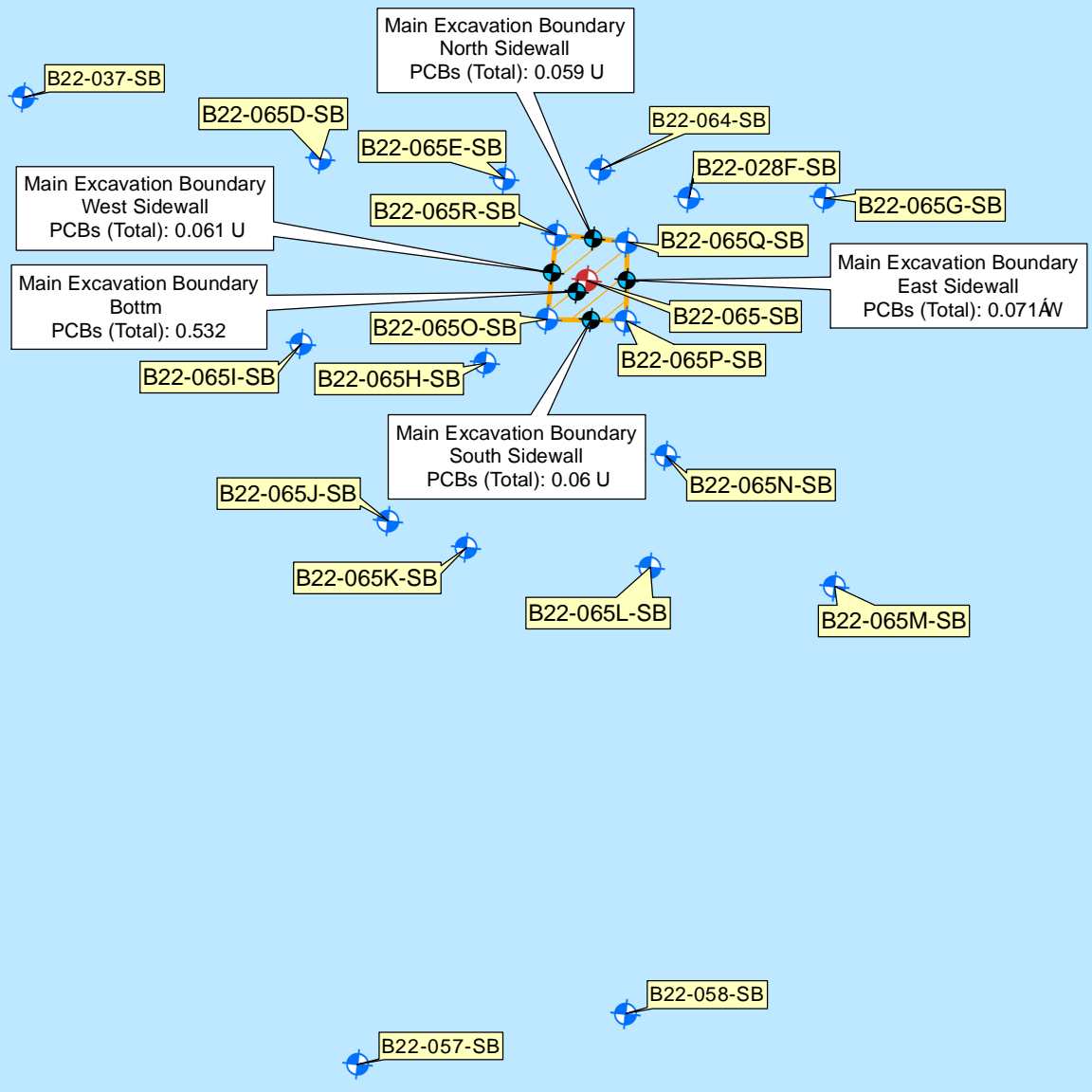
November 11, 2016

EnviroAnalytics Group
ARM Project 160443M-5

Tradeport Atlantic
Baltimore County, MD

Figure
2

| | |
|---|----------------------|
| Excavation Criteria PCBs (Total): 50 mg/kg | |
| Exceedance | Excavation Boundary |
| No Exceedance | Limit of Disturbance |
| Confirmation Sample | |
| *All Results in mg/kg | |
| Excavation Area Main Excavation: 112 sq ft | |

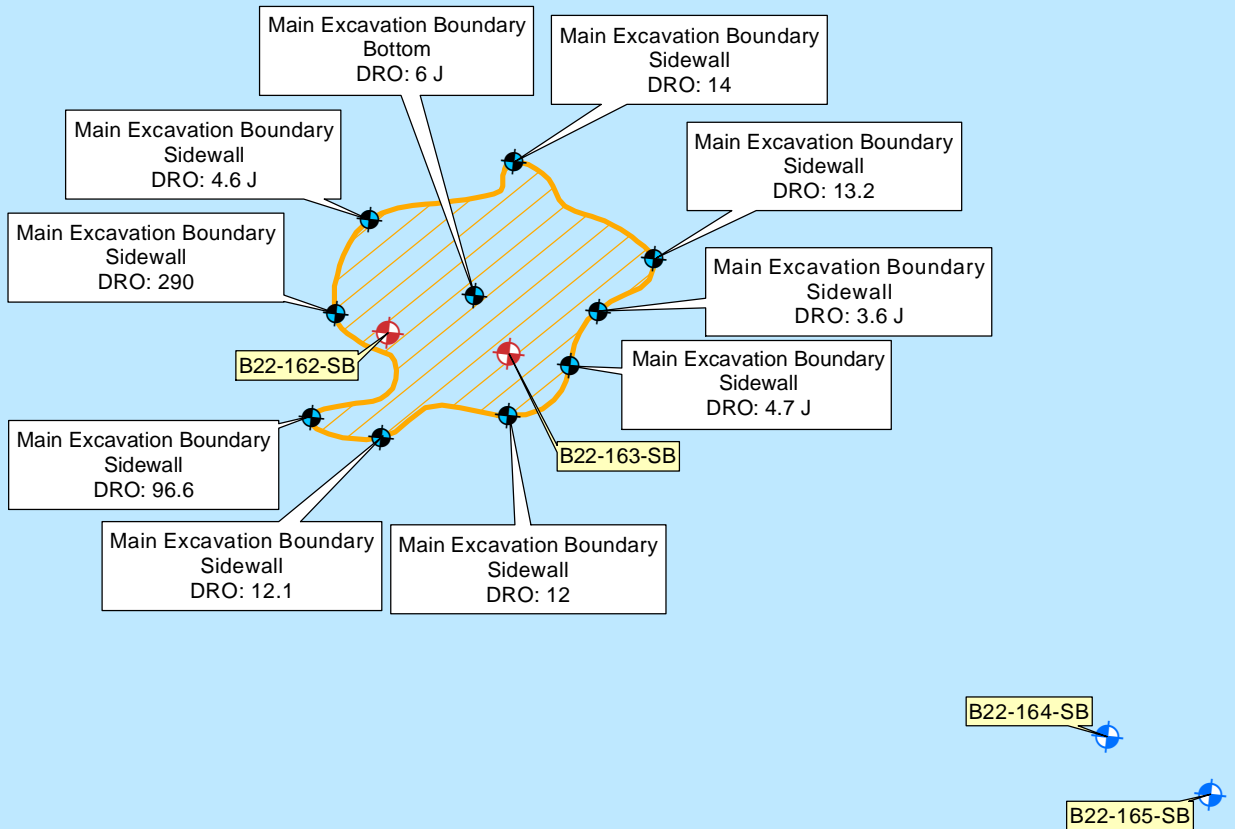


Excavation Criteria
DRO: 6,200 mg/kg

- Exceedance
- No Exceedance
- Confirmation Sample
- Excavation Boundary
- Limit of Disturbance

*All Results in mg/kg

Excavation Area
Main Excavation: 2,025 sq ft



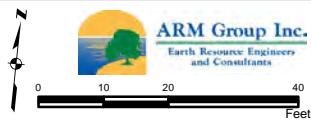
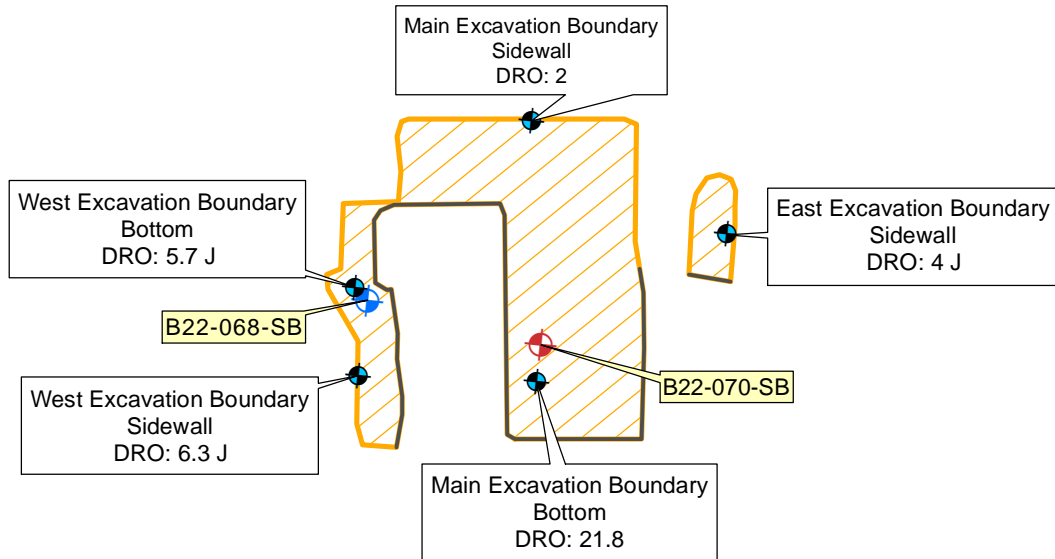
Excavation Criteria
DRO: 6,200 mg/kg

- ⊕ Exceedance
- ⊕ No Exceedance
- ⊕ Confirmation Sample
- Concrete
- Excavation Boundary
- Limit of Disturbance

*All Results in mg/kg

*Portions of the excavation area bounded by 24" concrete.
No confirmation samples taken at these locations.

Excavation Area
Main Excavation: 1,228 sq ft
East Excavation: 98 sq ft
West Excavation: 245 sq ft



B22-070-SB Excavation
Aerial View

November 14, 2016

EnviroAnalytics Group
ARM Project 160443M-5

Tradepoint Atlantic
Baltimore County, MD

Figure

5

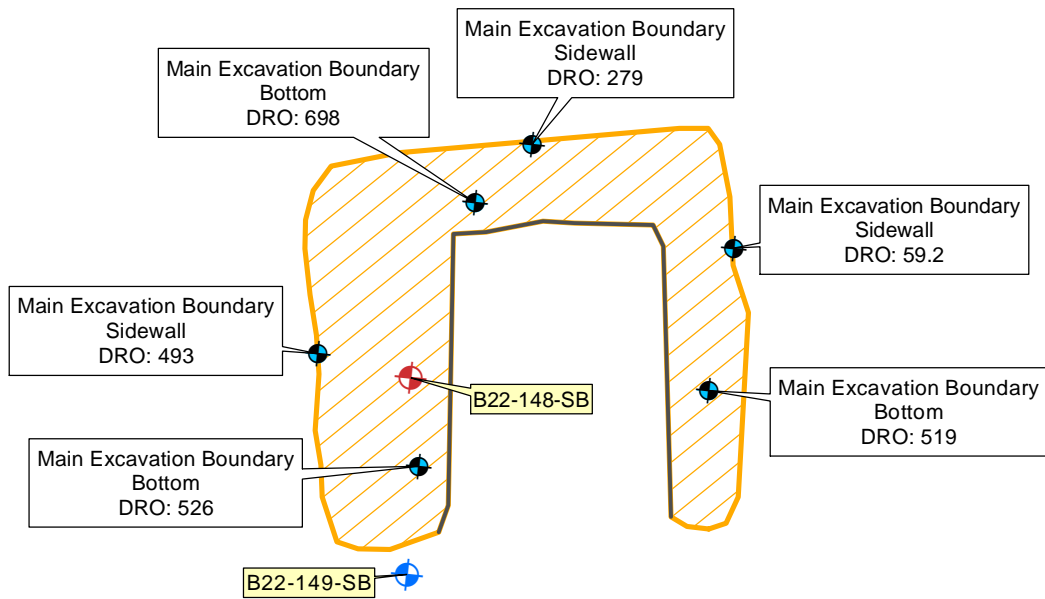
Excavation Criteria
DRO: 6,200 mg/kg






- Exceedance
- No Exceedance
- Confirmation Sample
- Concrete
- Excavation Boundary
- Limit of Disturbance

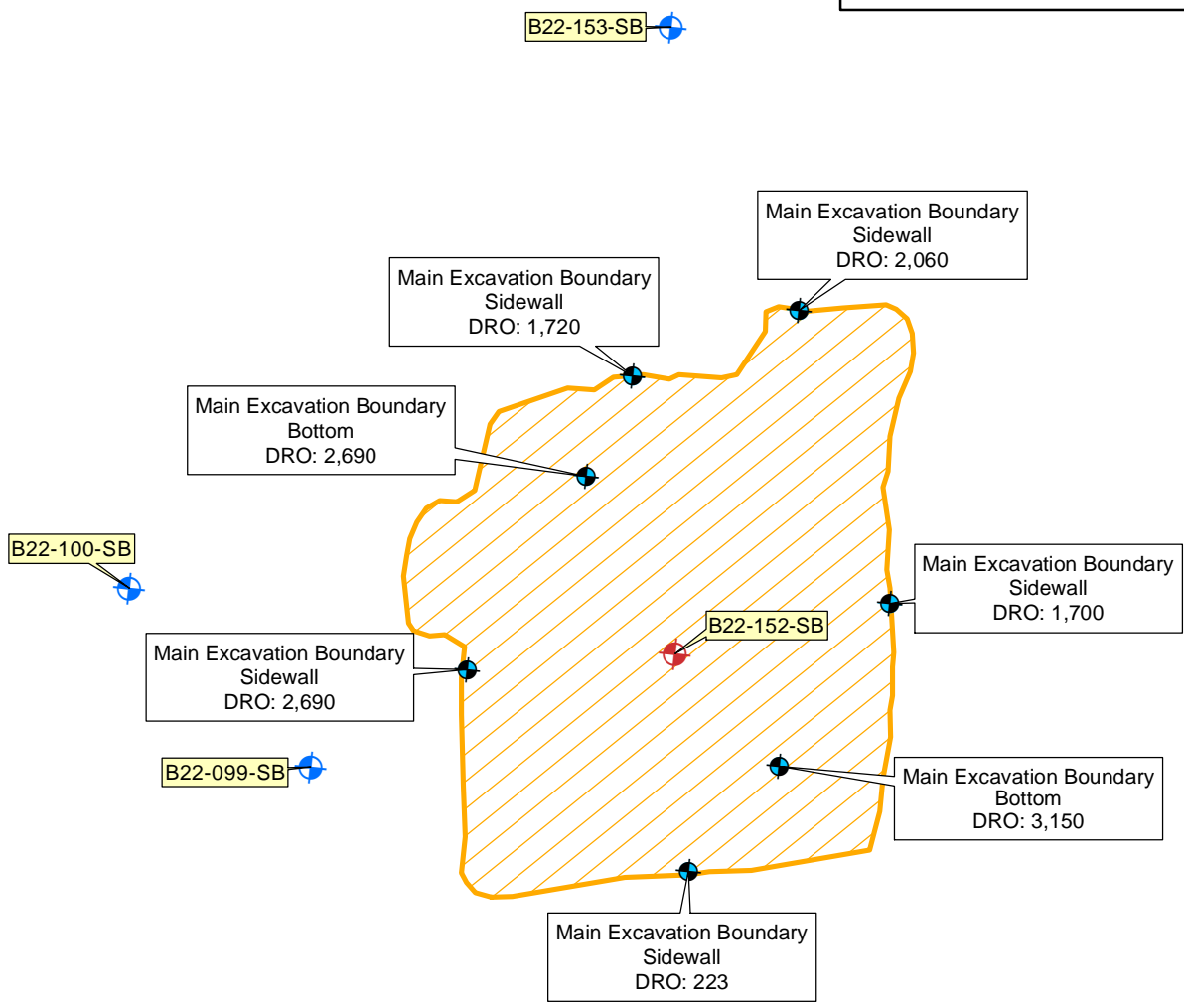
*All Results in mg/kg

*Portions of the excavation area bounded by 24" concrete.
No confirmation samples taken at these locations.

Excavation Area
Main Excavation: 802 sq ft



| | |
|--|---|
| Excavation Criteria DRO: 6,200 mg/kg | |
| <ul style="list-style-type: none">  Exceedance  No Exceedance  Confirmation Sample | <ul style="list-style-type: none">  Excavation Boundary  Limit of Disturbance |
| *All Results in mg/kg | |
| Excavation Area Main Excavation: 5,160 sq ft | |



**B22-152-SB Excavation
Aerial View**
November 14, 2016

EnviroAnalytics Group
ARM Project 160443M-5
Tradepoint Atlantic
Baltimore County, MD

Attachment 1

**Parcel B22: B22-065 Excavation
Photograph Log
Sparrows Point, Maryland**



B22-065 excavation limits and use of hammer attachment to break up the first 8-10” of the reinforced concrete pad and removal of impacted material.



B22-065 excavation completed to a depth of 2 feet below ground surface. Four sidewall confirmation samples and one bottom confirmation sample was collected.

**Parcel B22: B22-028 Excavation
Photograph Log
Sparrows Point, Maryland**



B22-028 East excavation limits prior to break up of the first 8-10" of the reinforced concrete pad and removal of impacted material.



B22-028 East excavation completed to a depth of 2 feet below ground surface. All four sidewalls composed of either concrete, with no visible staining, and/or large gravel therefore only a bottom confirmation sample was taken.

**Parcel B22: B22-028 Excavation
Photograph Log
Sparrows Point, Maryland**



B22-028 South excavation limits prior to removal of impacted material.



B22-028 South excavation completed to a depth of 2 feet below ground surface. Three of the four sidewalls composed of concrete, with no visible staining, and the northern portion of this excavation had no sidewall therefore only a bottom confirmation sample was taken.

**Parcel B22: B22-028 Excavation
Photograph Log
Sparrows Point, Maryland**



B22-028 Main excavation limits prior to removal of impacted material.



Excavation activities along the northern section of the B22-028 Main excavation.

**Parcel B22: B22-028 Excavation
Photograph Log
Sparrows Point, Maryland**



Impacted material observed in the middle of the Main excavation adjacent to the trench manhole. An additional three feet of impacted material was removed.



A view of the north wall of the additional impacted material observed in the middle of the Main excavation adjacent to the trench manhole.

Parcel B22: B22-028 Excavation
Photograph Log
Sparrows Point, Maryland



View of the french drain observed within the Main excavation. The french drain extends from the north wall to the south wall within the excavated area.



View of the french drain connected to the manhole facing north.

**Parcel B22: B22-028 Excavation
Photograph Log
Sparrows Point, Maryland**



View of the east wall of the completed Main Excavation facing northwest.



View of the south and east wall of the completed Main Excavation facing southeast.

**Parcel B22: PCB IDW
Photograph Log
Sparrows Point, Maryland**



View of the PCB stockpiled material area setup prior to placement of impacted material. Poly is setup along the ground surface with hail-bails used as berms.



View of the covered PCB stockpiles at the conclusion of the PCB excavations. Soil and concrete materials were segregated and stockpiled separately.

**Parcel B22: B22-070 Excavation
Photograph Log
Sparrows Point, Maryland**



View of the B22-070 excavation, facing south, prior excavation activities.



View of impacted material observed along the east wall of the main excavation area.

**Parcel B22: B22-070 Excavation
Photograph Log
Sparrows Point, Maryland**



View of impacted material observed along the south wall of the main excavation area.



View of impacted material and the utility pipe observed along the east wall of the main excavation area. Highly impacted material was observed between the utility pipe and the bottom of the slab above it.

**Parcel B22: B22-070 Excavation
Photograph Log
Sparrows Point, Maryland**



View of impacted material observed along the west wall of the main excavation area.



View of concrete box located in the northwest corner of the main excavated area. The benched area, approximately three feet below grade, is seen beyond the end of the concrete box.

**Parcel B22: B22-070 Excavation
Photograph Log
Sparrows Point, Maryland**



View of impacted material observed along the concrete box. The non-impacted benched area is located in front of the concrete box.



View of the location of the east excavation area facing south.

**Parcel B22: B22-070 Excavation
Photograph Log
Sparrows Point, Maryland**



View of the west excavation, facing south, to confirm the horizontal extent of impacts.



View of the west excavation, facing north, to confirm the horizontal extent of impacts.

**Parcel B22: B22-162 & B22-163 Excavation
Photograph Log
Sparrows Point, Maryland**



View of the completed B22-162 & B22-163 excavation facing east.



View of the east impacted material along the bottom in the northeast corner.

**Parcel B22: B22-162 & B22-163 Excavation
Photograph Log
Sparrows Point, Maryland**



View of product observed on the bottom of the excavation.



View of the impacted excavated material.

**Parcel B22: B22-162 & B22-163 Excavation
Photograph Log
Sparrows Point, Maryland**



View of the west wall of the completed excavation.



View of the north wall of the completed excavation.

**Parcel B22: B22-162 & B22-163 Excavation
Photograph Log
Sparrows Point, Maryland**



View of the west wall of the completed excavation.



View of the east wall of the completed excavation.

**Parcel B22: B22-162 & B22-163 Excavation
Photograph Log
Sparrows Point, Maryland**



View of the south wall of the completed excavation.

**Parcel B22: B22-148 Excavation
Photograph Log
Sparrows Point, Maryland**



View of the excavation activities at B22-148 excavation.



View of the french drain observed in the northwest corner of the excavation.

**Parcel B22: B22-148 Excavation
Photograph Log
Sparrows Point, Maryland**



View of the MCM excavator with the jack hammer attachment used to break-up the french drain and slag.



View of the western side interior wall.

**Parcel B22: B22-148 Excavation
Photograph Log
Sparrows Point, Maryland**



View of the eastern side of the excavation and interior east wall.



View of the northern side of the excavation and north interior wall.

**Parcel B22: B22-152 Excavation
Photograph Log
Sparrows Point, Maryland**



View of the proposed B22-152 excavation area encompassing the former tank's pad.



View of significantly impacted material, facing north, located adjacent to a potential fill pipe for the former tank.
This area is located along the western wall of the excavation.

**Parcel B22: B22-152 Excavation
Photograph Log
Sparrows Point, Maryland**



View of the MCM excavator with the jackhammer attachment used to break-up the slag throughout the excavation.



View of the material under the tank pad slag. Minor impacts were observed in this area. No impacts were observed on the tank's concrete pad and support ring.

**Parcel B22: B22-152 Excavation
Photograph Log
Sparrows Point, Maryland**



View of the MCM and ENR equipment completing excavation activities.



View of the northeast corner extension, due to significant impacts, and product observed on the bottom of the excavation.

**Parcel B22: B22-152 Excavation
Photograph Log
Sparrows Point, Maryland**



View of the west wall extension due to significant impacts observed. The product pipe was routed through this area.



View of the south wall of the completed excavation.

**Parcel B22: B22-152 Excavation
Photograph Log
Sparrows Point, Maryland**



View of the north wall of the completed excavation facing north.



View of the east wall of the completed excavation facing east.

**Parcel B22: B22-152 Excavation
Photograph Log
Sparrows Point, Maryland**



View of the west wall of the completed excavation facing northwest.



View of the completed excavation facing southeast.

**Parcel B22: B22-152 Excavation
Photograph Log
Sparrows Point, Maryland**



View of the completed excavation facing north.

Attachment 2

SPARROWS POINT
TSCA SOILS - US ECOLOGY
Load Log

| Load | Date | Ticket | Ton | Total |
|-------|------------|---------|-------|--------|
| 1 | 10/31/2016 | 1270535 | 21.67 | |
| 2 | 10/31/2016 | 1270538 | 22.87 | |
| 3 | 10/31/2016 | 1270554 | 26.14 | |
| 4 | 11/1/2016 | 1270607 | 22.69 | |
| 5 | 11/2/2016 | 1270658 | 24.11 | |
| 6 | 11/2/2016 | 1270674 | 25.27 | |
| 7 | 11/2/2016 | 1270675 | 23.79 | |
| 8 | 11/3/2016 | 1270716 | 22.51 | |
| Total | | | | 189.05 |

Wayne Disposal, Inc.
49350 North I-94 Service Drive, Belleville, Michigan 48111

Receipt

ENTERPRISE NETWORK RESOLUTIONS
874 PINEY HOLLOW ROAD
P O BOX 70
WINSLOW, NJ 08095

Receipt ID: 1270535
EQ Account #: 11931
Manifest / BOL: 016675154JJK
Transporter: HORWITH
Date: 10/31/2016
Time In: 9:00 AM
Time Out: 10:19 AM

| Line | Description Generator | Qty. Unit |
|-------|---|-------------|
| 1 - 1 | J165130WDI - PCB Soil | 21.670 TONS |
| | Hazardous Surcharge Ton | 21.670 TONS |
| | MDD053945432 ENVIRO ANALYTICS GROUP | |
| | Gross: 74,220 Tare: 30,880 Net: 43,340 | |
| 2 | Wayne Disposal Host Community Agreement Royalty Fee | 21.670 TONS |
| | MDD053945432 ENVIRO ANALYTICS GROUP | |
| | Gross: 74,220 Tare: 30,880 Net: 43,340 | |

#2

Form Approved. OMB No. 2050-0039

Please print or type. (Form designed for use on offite (12-pitch) typewriter.)

| | | | | | | | | |
|---|---------|--|--|---|--|---------------------------------|-----------------|-------------------------------|
| UNIFORM HAZARDOUS WASTE MANIFEST | | 1. Generator ID Number MDD 053 945 432 | 2. Page 1 of 1 | 3. Emergency Response Phone 314-620-3056 | 4. Manifest Tracking Number 016675154 JJK | | | |
| 5. Generator's Name and Mailing Address ENVIRO ANALYTICS GROUP 1650 DE PERES RD SUITE 203 ST LOUIS, MO 63131 | | | Generator's Site Address (if different than mailing address) 1600 SPARROWS POINT BLVD SPARROWS POINT, MD 21219 | | | | | |
| 6. Generator's Phone: | | | U.S. EPA ID Number PAD146714B78 | | | | | |
| 7. Transporter 1 Company Name Horwith Trucks Inc | | | U.S. EPA ID Number | | | | | |
| 8. Designated Facility Name and Site Address WAYNE DISPOSAL INC. SITE #2 LANDFI 49350 N I-94 SERVICE DRIVE BELLEVILLE, MI 48111 Facility's Phone: (800) 592-5489 | | | U.S. EPA ID Number MID 048 090 633 | | | | | |
| GENERATOR | 9a. HAZ | 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any)) | 10. Containers No. Type | | 11. Total Quantity | 12. Unit Wt/Vol | 13. Waste Codes | |
| | X | UN3432, Polychlorinated biphenyls, solid, mixture, 9, PGII, ERG #171 | 001 | DT | EST 23.00 | kg | PCB1 | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| 14. Special Handling Instructions and Additional Information J165130W01 / PCB Soil OSP Labeling | | | | | | | | |
| 15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true. | | | | | | | | |
| Generator's/Offero's Printed/Typed Name James Catalda | | | | | | Signature <i>[Signature]</i> | | Month Day Year 11 01 28 16 |
| 16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.: | | | | | | | | |
| 17. Transporter Acknowledgment of Receipt of Materials | | | | | | | | |
| Transporter 1 Printed/Typed Name Clayton Wheland | | | | | | Signature <i>[Signature]</i> | | Month Day Year 10 08 16 |
| Transporter Printed/Typed Name | | | | | | Signature | | Month Day Year |
| 18. Discrepancy | | | | | | | | |
| 18a. Discrepancy Indication Space <input checked="" type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection | | | | | | | | |
| Actual weight 19700 kg per Patrick Whitehead Envirocon. Manifest Reference Number: 55112116 | | | | | | | | |
| 18b. Alternate Facility (or Generator) | | | | | | | | |
| Facility's Phone: | | | | | | Month Day Year | | |
| 18c. Signature of Alternate Facility (or Generator) | | | | | | Month Day Year | | |
| 19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) | | | | | | | | |
| 1. PCB | | 2. | | 3. | | 4. | | |
| 20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a | | | | | | | | |
| Printed/Typed Name Chris Grissom | | | | | | Signature <i>[Signature]</i> | | Month Day Year 11 07 16 |

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

FOR MANIFESTED PCB WASTE

This certificate is to verify the wastes identified as PCB Spent
and specified on Manifest # 0111175154111, Line Item has been landfilled on
Oct 31, Zellan accordance with all local, state and federal regulations by:

Wayne Disposal, Inc
(EPA I.D. # MID048090633)

49350 N. I-94 Service Drive, Belleville, Michigan 48111
Telephone: 1-800-KWALITY (592-5489)
Fax: 1-800-KWALFAX (592-5329)

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who are acting under my direct instructions made the verification that this information is true accurate and complete.

Authorized Signature: *Paula Bostman*

CERTIFICATE OF DISPOSAL

From #REC-FM-030-BEL

US ECOLOGY 49350 N. I-94 SERVICE DRIVE BELLEVILLE, MICHIGAN 48111
The electronic version of this document is the controlled version. Each user is responsible for ensuring that any document being used is the current version.

5/1/15

Wayne Disposal, Inc.
49350 North I-94 Service Drive, Belleville, Michigan 48111

Receipt

ENTERPRISE NETWORK RESOLUTIONS
 874 PINEY HOLLOW ROAD
 P O BOX 70
 WINSLOW, NJ 08095

Receipt ID: 1270538
 EQ Account #: 11931
 Manifest / BOL: 016674000JJK
 Transporter: HORWITH
 Date: 10/31/2016
 Time In: 9:09 AM
 Time Out: 10:22 AM

| Line | Description Generator | Qty. Unit |
|-------|--|----------------------------|
| 1 - 1 | J165130WDI - PCB Soil Hazardous Surcharge Ton MDD053945432 ENVIRO ANALYTICS GROUP | 22.870 TONS 22.870 TONS |
| | Gross: 76,100 Tare: 30,360 Net: 45,740 | |
| 2 | Wayne Disposal Host Community Agreement Royalty Fee MDD053945432 ENVIRO ANALYTICS GROUP | 22.870 TONS |
| | Gross: 76,100 Tare: 30,360 Net: 45,740 | |

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0839

| | | | | | | | |
|---|--------|--|--|---|--|-----------------|-----------------|
| UNIFORM HAZARDOUS WASTE MANIFEST | | 1. Generator ID Number MDD 053 945 432 | 2. Page 1 of 1 | 3. Emergency Response Phone 314-620-3056 | 4. Manifest Tracking Number 016674000 JJK | | |
| 5. Generator's Name and Mailing Address ENVIRO ANALYTICS GROUP 1050 DE PERES RD SUITE 203 ST LOUIS, MO 63131 | | | Generator's Site Address (if different than mailing address) 1800 SPARROWS POINT BLVD SPARROWS POINT, MD 21219 | | | | |
| 6. Transporter 1 Company Name Horwith Trucks Inc. | | | U.S. EPA ID Number PA0146714878 | | | | |
| 7. Transporter 2 Company Name | | | U.S. EPA ID Number | | | | |
| 8. Designated Facility Name and Site Address WAYNE DISPOSAL, INC. SITE #2 LANDFI 49350 N I-94 SERVICE DRIVE BELLEVILLE, MI 48111 Facility's Phone: (800) 592-5489 | | | U.S. EPA ID Number MID 048 090 633 | | | | |
| GENERATOR | 9a. HM | 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any)) | 10. Containers No. Type | | 11. Total Quantity | 12. Unit Wt/Vol | 13. Waste Codes |
| | X | UN3432, Polychlorinated biphenyls, solid, mixture, 9, PGII, ERG #171 | 001 | DT | Est 3300 | KG | PCB1 |
| | 2. | | | | | | |
| | 3. | | | | | | |
| | 4. | | | | | | |
| 14. Special Handling Instructions and Additional Information J185130WDI / PCB Soil | | | | | | | |
| 15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 49 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true. | | | | | | | |
| Generator's/Offero's Printed/Typed Name James Calenda | | | Signature <i>[Signature]</i> | | Month Day Year 11/0 28/16 | | |
| 16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____ | | | | | | | |
| 17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name Michael NEFF Signature <i>[Signature]</i> Month Day Year 11/0 28/16 Transporter 2 Printed/Typed Name Signature Month Day Year | | | | | | | |
| 18. Discrepancy 18a. Discrepancy Indication Space <input checked="" type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection actual weight 20791 kgs per Patrick Whitworth at ENR Com. - PO# 1112116 | | | | | | | |
| DESIGNATED FACILITY 18b. Alternate Facility (or Generator) Facility's Phone: _____ U.S. EPA ID Number _____ 18c. Signature of Alternate Facility (or Generator) Month Day Year | | | | | | | |
| 19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 1. PCB 2. 3. 4. | | | | | | | |
| 20. Designated Facility Owner or Operator. Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a Printed/Typed Name Chris Corissom Signature <i>[Signature]</i> Month Day Year 11/0 31/16 | | | | | | | |

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

FOR MANIFESTED PCB WASTE

This certificate is to verify the wastes identified as Pesterial and specified on Manifest # 01we74000 111, Line Item 1 has been landfilled on 08/21, take in accordance with all local, state and federal regulations by:

Wayne Disposal, Inc
(EPA I.D. # MID048090633)

49350 N. I-94 Service Drive, Belleville, Michigan 48111
Telephone: 1-800-KWALITY (592-5489)
Fax: 1-800-KWALIFAX (592-5329)

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who are acting under my direct instructions made the verification that this information is true accurate and complete.

Authorized Signature:

Barbara Bortnick

CERTIFICATE OF DISPOSAL

US ECOLOGY 49350 N. I-94 SERVICE DRIVE BELLEVILLE, MICHIGAN 48111

From #REC-FM-030-BEL

The electronic version of this document is the controlled version. Each user is responsible for ensuring that any document being used is the current version.

5/1/15

Wayne Disposal, Inc.
49350 North I-94 Service Drive, Belleville, Michigan 48111

Receipt

ENTERPRISE NETWORK RESOLUTIONS
 874 PINEY HOLLOW ROAD
 P O BOX 70
 WINSLOW, NJ 08095

Receipt ID: 1270554
EQ Account #: 11931
Manifest / BOL: 016675153JJK
Transporter: HORWITH
Date: 10/31/2016
Time In: 10:31 AM
Time Out: 12:11 PM

| Line | Description Generator | Qty. Unit |
|-------|---|-------------|
| 1 - 1 | J165130WDI - PCB Soil | 26.140 TONS |
| | Hazardous Surcharge Ton | 26.140 TONS |
| | MDD053945432 ENVIRO ANALYTICS GROUP | |
| | Gross: 83,000 Tare: 30,720 Net: 52,280 | |
| 2 | Wayne Disposal Host Community Agreement Royalty Fee | 26.140 TONS |
| | MDD053945432 ENVIRO ANALYTICS GROUP | |
| | Gross: 83,000 Tare: 30,720 Net: 52,280 | |

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

| | | | | | | | |
|---|---|--|--|---|--|-------------------|-----------------|
| UNIFORM HAZARDOUS WASTE MANIFEST | | 1. Generator ID Number MDD 053 945 432 | 2. Page 1 of 1 | 3. Emergency Response Phone 314-620-3056 | 4. Manifest Tracking Number 016675153 JJK | | |
| 5. Generator's Name and Mailing Address ENVIRO ANALYTICS GROUP 1650 DE PERES RD SUITE 203 ST LOUIS, MO 63131 | | | Generator's Site Address (if different than mailing address) 1600 SPARROWS POINT BLVD SPARROWS POINT, MD 21219 | | | | |
| 6. Transporter 1 Company Name HORN WITH TRUCKS INC | | | U.S. EPA ID Number PAD-146714878 | | | | |
| 7. Transporter 2 Company Name | | | U.S. EPA ID Number | | | | |
| 8. Designated Facility Name and Site Address WAYNE DISPOSAL, INC. SITE #2 LANDFI 49350 N I-94 SERVICE DRIVE BELLEVILLE, MI 48111 | | | U.S. EPA ID Number MID 048 090 633 | | | | |
| Facility's Phone: (800) 592-5489 | | | | | | | |
| GENERATOR | 9a. HM | 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any)) | 10. Containers No. Type | | 11. Total Quantity | 12. Unit Wt./Vol. | 13. Waste Codes |
| | X | UN3432, Polychlorinated biphenyls, solid, mixture, 9, PGII, ERG #171 | 1 | DT | 22,000 | K | PCB1 |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| 14. Special Handling Instructions and Additional Information J185130WDI / PCB Soil SSD: 10-20-16 | | | | | | | |
| 15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Content. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true. | | | | | | | |
| Generator's/Offor's Printed/Typed Name James Calenda | | Signature <i>[Signature]</i> | | Month Day Year 10 28 16 | | | |
| INTL | 16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____ | | | | | | |
| TRANSPORTER | 17. Transporter Acknowledgment of Receipt of Materials | | | | | | |
| | Transporter 1 Printed/Typed Name MICHAEL KABACINSKI | | Signature <i>[Signature]</i> | | Month Day Year 10 28 16 | | |
| Transporter 2 Printed/Typed Name | | Signature | | Month Day Year | | | |
| DESIGNATED FACILITY | 18. Discrepancy | | | | | | |
| | 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection | | | | | | |
| | Manifest Reference Number: | | | | | | |
| | 18b. Alternate Facility (or Generator) | | | U.S. EPA ID Number | | | |
| Facility's Phone: | | | | | | | |
| 18c. Signature of Alternate Facility (or Generator) | | | | | | Month Day Year | |
| 19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) | | | | | | | |
| 1. PCB | | 2. | | 3. | | 4. | |
| 20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a | | | | | | | |
| Printed/Typed Name Chris Gritsen | | Signature <i>[Signature]</i> | | Month Day Year 10 31 16 | | | |

FOR MANIFESTED PCB WASTE

This certificate is to verify the wastes identified as PCB Sludge and specified on Manifest # 016125533111, Line Item 1 has been landfilled on Oct 31, 2016 in accordance with all local, state and federal regulations by:

Wayne Disposal, Inc
(EPA I.D. # MIDD048090633)

49350 N. I-94 Service Drive, Belleville, Michigan 48111
Telephone: 1-800-KWALITY (592-5489)
Fax: 1-800-KWALIFAX (592-5329)

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who are acting under my direct instructions made the verification that this information is true accurate and complete.

Authorized Signature:



CERTIFICATE OF DISPOSAL

US ECOLOGY 49350 N. I-94 SERVICE DRIVE BELLEVILLE, MICHIGAN 48111

From PREC-FM-030-BEL

The electronic version of this document is the controlling version. Each user is responsible for ensuring that any document being used is the current version.

5/1/15

Wayne Disposal, Inc.
49350 North I-94 Service Drive, Belleville, Michigan 48111

Receipt

ENTERPRISE NETWORK RESOLUTIONS
874 PINEY HOLLOW ROAD
P O BOX 70
WINSLOW, NJ 08095

Receipt ID: 1270607
EQ Account #: 11931
Manifest / BOL: 016675151JJK
Transporter: HORWITH
Date: 11/01/2016
Time In: 8:36 AM
Time Out: 9:17 AM

| Line | Description Generator | Qty. Unit |
|-------|---|-------------|
| 1 - 1 | J165130WDI - PCB Soil | 22.690 TONS |
| | Hazardous Surcharge Ton | 22.690 TONS |
| | MDD053945432 ENVIRO ANALYTICS GROUP | |
| | Gross: 77,060 Tare: 31,680 Net: 45,380 | |
| 2 | Wayne Disposal Host Community Agreement Royalty Fee | 22.690 TONS |
| | MDD053945432 ENVIRO ANALYTICS GROUP | |
| | Gross: 77,060 Tare: 31,680 Net: 45,380 | |

428

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

| UNIFORM HAZARDOUS WASTE MANIFEST | | 1. Generator ID Number MDD 053 945 432 | 2. Page 1 of 1 | 3. Emergency Response Phone 314-620-3046 | 4. Manifest Tracking Number 016675151 JJK | |
|--|--|---|--|---|--|-----------------|
| 5. Generator's Name and Mailing Address ENVIRO ANALYTICS GROUP 1650 DE PERES RD SUITE 203 ST LOUIS, MO 63131 | | | Generator's Site Address (if different than mailing address) 1600 SPARROWS POINT BLVD SPARROWS POINT, MD 21219 | | | |
| 6. Transporter 1 Company Name Horwith Trucks Inc | | | U.S. EPA ID Number PAJ 146 714 878 | | | |
| 7. Transporter 2 Company Name | | | U.S. EPA ID Number | | | |
| 8. Designated Facility Name and Site Address WAYNE DISPOSAL, INC. SITE #2 LANDFI 49350 N I-94 SERVICE DRIVE BELLEVILLE, MI 48111 Facility's Phone: (800) 592-5489 | | | U.S. EPA ID Number MID 048 090 633 | | | |
| 9a. HM | 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any)) | 10. Containers | | 11. Total Quantity | 12. Unit Wt./Vol. | 13. Waste Codes |
| | | No. | Type | | | |
| X | UN3432, Polychlorinated biphenyls, solid, mixture, 9, PGII, ERG #171 | 1 | DT | EST 220 | BL | PCB1 |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| 14. Special Handling Instructions and Additional Information J185130WDI / PCB Soil 050 6-29-16 | | | | | | |
| 15. GENERATOR/SUPPLIER'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true. | | | | | | |
| Generator/Supplier's Printed/Typed Name James Calenda | | | Signature <i>[Signature]</i> | | Month Day Year 10 12 16 | |
| 16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____ | | | | | | |
| 17. Transporter Acknowledgment of Receipt of Materials | | | | | | |
| Transporter 1 Printed/Typed Name Glenn Hawk | | | Signature <i>[Signature]</i> | | Month Day Year 10 31 16 | |
| Transporter 2 Printed/Typed Name | | | Signature | | Month Day Year | |
| 18. Discrepancy | | | | | | |
| 18a. Discrepancy Indication Space <input checked="" type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection actual weight 26627 kg per Patrick Whitworth - ENR Com 8/11/16 discuss correct quantity 12 per Patrick Whitworth - ENR Com 8/11/16 | | | | | | |
| 18b. Alternate Facility (or Generator) _____ U.S. EPA ID Number _____ | | | | | | |
| Facility's Phone: _____ | | | | | | |
| 18c. Signature of Alternate Facility (or Generator) _____ Month Day Year _____ | | | | | | |
| 19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) | | | | | | |
| 1. | 2. | 3. | 4. | | | |
| 1. | PCB | | | | | |
| 20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18b | | | | | | |
| Printed/Typed Name Chris Grissom | | | Signature <i>[Signature]</i> | | Month Day Year 11 1 16 | |

FOR MANIFESTED PCB WASTE

This certificate is to verify the wastes identified as Perceval
and specified on Manifest # 0602575116, Line Item 1 has been landfilled on
Nov 1, 2016 in accordance with all local, state and federal regulations by:

Wayne Disposal, Inc
(EPA I.D. # MIDD048090633)

49350 N. I-94 Service Drive, Belleville, Michigan 48111
Telephone: 1-800-KWALITY (592-5489)
Fax: 1-800-KWALIFAX (592-5329)

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who are acting under my direct instructions made the verification that this information is true accurate and complete.

Authorized Signature: *Shirley Robinson*

CERTIFICATE OF DISPOSAL

US ECOLOGY 49350 N. I-94 SERVICE DRIVE BELLEVILLE, MICHIGAN 48111

From #REC-FM-030-BEL

The electronic version of this document is the controlled version. Each user is responsible for ensuring that any document being used is the current version.

5/1/15

Wayne Disposal, Inc.
49350 North I-94 Service Drive, Belleville, Michigan 48111

Receipt

ENTERPRISE NETWORK RESOLUTIONS
 874 PINEY HOLLOW ROAD
 P O BOX 70
 WINSLOW, NJ 08095

Receipt ID: 1270658
 EQ Account #: 11931
 Manifest / BOL: 016675150JJK
 Transporter: HORWITH
 Date: 11/02/2016
 Time In: 8:02 AM
 Time Out: 8:38 AM

| Line | Description Generator | Qty. Unit |
|-------|--|----------------------------|
| 1 - 1 | J165130WDI - PCB Soil Hazardous Surcharge Ton MDD053945432 ENVIRO ANALYTICS GROUP | 24.110 TONS 24.110 TONS |
| | Gross: 79,380 Tare: 31,160 Net: 48,220 | |
| 2 | Wayne Disposal Host Community Agreement Royalty Fee MDD053945432 ENVIRO ANALYTICS GROUP | 24.110 TONS |
| | Gross: 79,380 Tare: 31,160 Net: 48,220 | |

4/21

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No. 2050-0039

| UNIFORM HAZARDOUS WASTE MANIFEST | | 1. Generator ID Number MDD 053 945 432 | 2. Page 1 of 1 | 3. Emergency Response Phone 314-620-3056 | 4. Manifest Tracking Number 016675150 JJK | | |
|---|--|---|--|---|--|-----------------|--|
| 5. Generator's Name and Mailing Address ENVIRO ANALYTICS GROUP 1650 DE PERES RD SUITE 203 ST LOUIS, MO 63131 | | | Generator's Site Address (if different than mailing address) 1600 SPARROWS POINT BLVD SPARROWS POINT, MD 21219 | | | | |
| 6. Transporter 1 Company Name Horwith Trucks Inc | | | U.S. EPA ID Number PA0146714878 | | | | |
| 7. Transporter 2 Company Name | | | U.S. EPA ID Number | | | | |
| 8. Designated Facility Name and Site Address WAYNE DISPOSAL, INC. SITE #2 LANDFI 49350 N I-94 SERVICE DRIVE BELLEVILLE, MI 48111 Facility's Phone: (800) 592-5489 | | | U.S. EPA ID Number MID 048 090 633 | | | | |
| 9a. Hbl | 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any)) | 10. Containers | | 11. Total Quantity | 12. Unit Wt./Vol. | 13. Waste Codes | |
| | | No. | Type | | | | |
| X | UN3432, Polychlorinated biphenyls, solid, mixture, 9, PGI1, ERG #171 | 01 | DT | EST 2000 | K | PCB1 | |
| 2. | | | | | | | |
| 3. | | | | | | | |
| 4. | | | | | | | |
| 14. Special Handling Instructions and Additional Information J185130WDT / PCB Soil | | | | | | | |
| 15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true. | | | | | | | |
| Generator's/Officer's Printed/Typed Name James Calenda | | | Signature | | Month Day Year 10 28 16 | | |
| 16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.: | | | | | | | |
| 17. Transporter Acknowledgment of Receipt of Materials | | | | | | | |
| Transporter 1 Printed/Typed Name John Kraum | | | Signature | | Month Day Year 11 1 16 | | |
| Transporter 2 Printed/Typed Name | | | Signature | | Month Day Year | | |
| 18. Discrepancy | | | | | | | |
| 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection | | | | | | | |
| 18b. Alternate Facility (or Generator) Manifest Reference Number: U.S. EPA ID Number | | | | | | | |
| 18c. Signature of Alternate Facility (or Generator) Month Day Year | | | | | | | |
| 19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) | | | | | | | |
| 1. PCB | | 2. | | 3. | | 4. | |
| 20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a | | | | | | | |
| Printed/Typed Name | | | Signature | | Month Day Year 11 2 16 | | |

FOR MANIFESTED PCB WASTE

This certificate is to verify the wastes identified as PCB waste
and specified on Manifest # 0166757504116, Line Item 1 has been landfilled on
Nov 2, 2016 in accordance with all local, state and federal regulations by:

Wayne Disposal, Inc
(EPA I.D. # MID048090633)

49350 N. I-94 Service Drive, Belleville, Michigan 48111
Telephone: 1-800-KWALITY (592-5489)
Fax: 1-800-KWALIFAX (592-5329)

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who are acting under my direct instructions made the verification that this information is true accurate and complete.

Authorized Signature: Bernie Bostrom

CERTIFICATE OF DISPOSAL

US ECOLOGY 49350 N. I-94 SERVICE DRIVE BELLEVILLE, MICHIGAN 48111

From WREC-FM-030-BEL

The electronic version of this document is the controlled version. Each user is responsible for ensuring that any document being used is the current version.

5/1/15

Wayne Disposal, Inc.
49350 North I-94 Service Drive, Belleville, Michigan 48111

Receipt

ENTERPRISE NETWORK RESOLUTIONS
874 PINEY HOLLOW ROAD
P O BOX 70
WINSLOW, NJ 08095

Receipt ID: 1270674
EQ Account #: 11931
Manifest / BOL: 016675152JJK
Transporter: HORWITH
Date: 11/02/2016
Time In: 11:45 AM
Time Out: 12:49 PM

| Line | Description Generator | Qty. Unit |
|-------|---|-------------|
| 1 - 1 | J165130WDI - PCB Soil | 25.270 TONS |
| | Hazardous Surcharge Ton | 25.270 TONS |
| | MDD053945432 ENVIRO ANALYTICS GROUP | |
| | Gross: 83,240 Tare: 32,700 Net: 50,540 | |
| 2 | Wayne Disposal Host Community Agreement Royalty Fee | 25.270 TONS |
| | MDD053945432 ENVIRO ANALYTICS GROUP | |
| | Gross: 83,240 Tare: 32,700 Net: 50,540 | |

TK 25

Please print or type. (Form designed for use on a 12-pitch typewriter.)

Form Approved. OMB No. 2050-0039

| | | | | | | | |
|---|--------|--|--|---|--|-----------------|-----------------|
| UNIFORM HAZARDOUS WASTE MANIFEST | | 1. Generator ID Number MDD 053 945 432 | 2. Page 1 of 1 | 3. Emergency Response Phone 314-620-3056 | 4. Manifest Tracking Number 016675152 JJK | | |
| 5. Generator's Name and Mailing Address ENVIRO ANALYTICS GROUP 1650 DE PERES RD SUITE 203 ST LOUIS, MO 63131 | | | Generator's Site Address (if different than mailing address) 1600 SPARROWS POINT BLVD SPARROWS POINT, MD 21219 | | | | |
| 6. Transporter 1 Company Name Horch TRUCKS INC | | | U.S. EPA ID Number PAD146714878 | | | | |
| 7. Transporter 2 Company Name | | | U.S. EPA ID Number | | | | |
| 8. Designated Facility Name and Site Address WAYNE DISPOSAL, INC. SITE #2 LANDFI 49350 N I-94 SERVICE DRIVE BELLEVILLE, MI 48111 Facility's Phone: (800) 592-5489 | | | U.S. EPA ID Number MID 048 090 633 | | | | |
| GENERATOR | 9a. HM | 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any)) | 10. Containers | | 11. Total Quantity | 12. Unit Wt/Vol | 13. Waste Codes |
| | X | UN3432, Polychlorinated biphenyls, solid, mixture, 9, PGI, ERG #171 | 201 | DT | 2800 | K | PCB1 |
| | 2. | | | | | | |
| | 3. | | | | | | |
| | 4. | | | | | | |
| 14. Special Handling Instructions and Additional Information J185130WDT/ PCB Soil SSD: 11-146 | | | | | | | |
| 15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true. | | | | | | | |
| Generator's/Officer's Printed/Typed Name James Calenda | | | Signature <i>[Signature]</i> | | Month 11 | Day 01 | Year 16 |
| 16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____ | | | | | | | |
| 17. Transporter Acknowledgment of Receipt of Materials | | | | | | | |
| Transporter 1 Printed/Typed Name Clayton Wheland | | | Signature <i>[Signature]</i> | | Month 11 | Day 01 | Year 16 |
| Transporter 2 Printed/Typed Name | | | Signature | | Month | Day | Year |
| 18. Discrepancy | | | | | | | |
| 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection | | | | | | | |
| 18b. Alternate Facility (or Generator) Manifest Reference Number: _____ U.S. EPA ID Number _____ | | | | | | | |
| 18c. Signature of Alternate Facility (or Generator) _____ Month _____ Day _____ Year _____ | | | | | | | |
| 19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) | | | | | | | |
| 1. PCB | | 2. | | 3. | | 4. | |
| 20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a | | | | | | | |
| Printed/Typed Name Chris Gibson | | | Signature <i>[Signature]</i> | | Month 11 | Day 21 | Year 16 |

FOR MANIFESTED PCB WASTE

This certificate is to verify the wastes identified as PCB waste and specified on Manifest # 0166755224, Line Item 1 has been landfilled on Nov 2, 2010 in accordance with all local, state and federal regulations by:

Wayne Disposal, Inc
(EPA I.D. # MIDD048090633)

49350 N. I-94 Service Drive, Belleville, Michigan 48111
Telephone: 1-800-KWALTTY (592-5489)
Fax: 1-800-KWALFAX (592-5329)

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who are acting under my direct instructions made the verification that this information is true accurate and complete.

Authorized Signature: *Brenda Postville*

CERTIFICATE OF DISPOSAL

From AR9C-FM430-BEL

The electronic version of this document is the controlled version. Each user is responsible for ensuring that any document being used is the current version.

US ECOLOGY 49350 N. I-94 SERVICE DRIVE BELLEVILLE, MICHIGAN 48111

5/1/15

Wayne Disposal, Inc.
49350 North I-94 Service Drive, Belleville, Michigan 48111

Receipt

ENTERPRISE NETWORK RESOLUTIONS
 874 PINEY HOLLOW ROAD
 P O BOX 70
 WINSLOW, NJ 08095

Receipt ID: 1270675
 EQ Account #: 11931
 Manifest / BOL: 016673980JJK
 Transporter: HORWITH
 Date: 11/02/2016
 Time In: 11:48 AM
 Time Out: 12:53 PM

| Line | Description Generator | Qty. Unit |
|-------|--|----------------------------|
| 1 - 1 | J165130WDI - PCB Soil Hazardous Surcharge Ton MDD053945432 ENVIRO ANALYTICS GROUP | 23.790 TONS 23.790 TONS |
| | Gross: 79,640 Tare: 32,060 Net: 47,580 | |
| 2 | Wayne Disposal Host Community Agreement Royalty Fee MDD053945432 ENVIRO ANALYTICS GROUP | 23.790 TONS |
| | Gross: 79,640 Tare: 32,060 Net: 47,580 | |

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

| | | | | | | |
|---|--|--|--|---|--|--------------------|
| UNIFORM HAZARDOUS WASTE MANIFEST | | 1. Generator ID Number MDD 053 945 432 | 2. Page 1 of 1 | 3. Emergency Response Phone 314-620-3056 | 4. Manifest Tracking Number 016673980 JJK | |
| 5. Generator's Name and Mailing Address 1650 DE PERES RD SUITE 203 ST LOUIS, MO 63131 Generator's Phone: | | | ENVIRO ANALYTICS GROUP 1600 SPARROWS POINT BLVD SPARROWS POINT, MD 21219 Generator's Site Address (if different than mailing address) | | | |
| 6. Transporter 1 Company Name Horwith Trucks Inc | | | U.S. EPA ID Number PA0146714878 | | | |
| 7. Transporter 2 Company Name | | | U.S. EPA ID Number | | | |
| 8. Designated Facility Name and Site Address 49350 N I-94 SERVICE DRIVE BELLEVILLE, MI 48111 Facility's Phone: (800) 592-5489 | | | WAYNE DISPOSAL, INC. SITE #2 LANDFILL U.S. EPA ID Number MID 048 090 633 | | | |
| GENERATOR | 9a. HM | 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any)) | | 10. Containers No. Type | | 11. Total Quantity |
| | X | RQ, UN3432, Polychlorinated biphenyls, solid, mixture, 9, PGII, ERG #171 | | 001 | DT | 23,000 |
| | 2. | | | | | |
| | 3. | | | | | |
| | 4. | | | | | |
| 12. Unit Wt./Vol. <input checked="" type="checkbox"/> K | | | | | | |
| 13. Waste Codes PCB1 | | | | | | |
| 14. Special Handling Instructions and Additional Information J165130WDI / PCB Soil Unique container id _____ Storage start date 10/31/16 | | | | | | |
| 15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 252.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true. | | | | | | |
| Generator's/Offendor's Printed/Typed Name James Calende | | Signature | | Month Day Year 11 11 16 | | |
| 16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____ | | | | | | |
| 17. Transporter Acknowledgment of Receipt of Materials | | | | | | |
| TRANSPORTER | Transporter 1 Printed/Typed Name Chris Grinnell | | Signature | | Month Day Year 11 11 16 | |
| | Transporter 2 Printed/Typed Name Michael Neri | | Signature | | Month Day Year 11 11 16 | |
| 18. Discrepancy | | | | | | |
| 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection | | | | | | |
| 18b. Alternate Facility (or Generator) U.S. EPA ID Number | | | | | | |
| 18c. Signature of Alternate Facility (or Generator) Month Day Year | | | | | | |
| 19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) | | | | | | |
| 1. PCB 2. 3. 4. | | | | | | |
| 20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a | | | | | | |
| Printed/Typed Name Jonathan Evans | | Signature | | Month Day Year 11 12 16 | | |

FOR MANIFESTED PCB WASTE

This certificate is to verify the wastes identified as Asbestos and specified on Manifest # 0161273950111, Line Item 1 has been landfilled on Nov 2, 2014 in accordance with all local, state and federal regulations by:

Wayne Disposal, Inc
(EPA I.D. # MID048090633)

49350 N. I-94 Service Drive, Belleville, Michigan 48111
Telephone: 1-800-KWALITY (592-5489)
Fax: 1-800-KWALIFAX (592-5329)

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who are acting under my direct instructions made the verification that this information is true accurate and complete.

Authorized Signature: *David R. Buehler*

CERTIFICATE OF DISPOSAL

US ECOLOGY 49350 N. I-94 SERVICE DRIVE BELLEVILLE, MICHIGAN 48111

From #REC-FM-030-BEL

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5/1/15

Wayne Disposal, Inc.
49350 North I-94 Service Drive, Belleville, Michigan 48111

Receipt

ENTERPRISE NETWORK RESOLUTIONS
 874 PINEY HOLLOW ROAD
 P O BOX 70
 WINSLOW, NJ 08095

Receipt ID: 1270716
EQ Account #: 11931
Manifest / BOL: 016675149JJK
Transporter: HORWITH
Date: 11/03/2016
Time In: 7:45 AM
Time Out: 8:21 AM

| Line | Description Generator | Qty. Unit |
|-------|---|-------------|
| 1 - 1 | J165130WDI - PCB Soil | 22.510 TONS |
| | Hazardous Surcharge Ton | 22.510 TONS |
| | MDD053945432 ENVIRO ANALYTICS GROUP | |
| | Gross: 76,060 Tare: 31,040 Net: 45,020 | |
| 2 | Wayne Disposal Host Community Agreement Royalty Fee | 22.510 TONS |
| | MDD053945432 ENVIRO ANALYTICS GROUP | |
| | Gross: 76,060 Tare: 31,040 Net: 45,020 | |

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

| | | | | | | | |
|---|--------|--|--|---|--|------------------|-----------------|
| UNIFORM HAZARDOUS WASTE MANIFEST | | 1. Generator ID Number MDD 053 945 432 | 2. Page 1 of 1 | 3. Emergency Response Phone 314-620-3096 | 4. Manifest Tracking Number 016675149 JJK | | |
| 5. Generator's Name and Mailing Address ENVIRO ANALYTICS GROUP 1650 DE PERES RD SUITE 203 ST LOUIS, MO 63131 | | | Generator's Site Address (if different than mailing address) 1600 SPARROWS POINT BLVD SPARROWS POINT, MD 21219 | | | | |
| 6. Transporter 1 Company Name Horwith Trucks Inc | | | U.S. EPA ID Number PA0146714878 | | | | |
| 7. Transporter 2 Company Name | | | U.S. EPA ID Number | | | | |
| 8. Designated Facility Name and Site Address WAYNE DISPOSAL, INC. SITE #2 LANDFI 49350 N I-94 SERVICE DRIVE BELLEVILLE, MI 48111 Facility's Phone: (800) 592-5489 | | | U.S. EPA ID Number MID 048 090 633 | | | | |
| GENERATOR | 9a. HM | 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any)) | 10. Containers | | 11. Total Quantity | 12. Unit Wt./Vol | 13. Waste Codes |
| | X | UN3432, Polychlorinated biphenyls, solid, mixture, 9, PGII, ERG #171 | No. | Type | 25,000 | K | PCB1 |
| | 2. | | | | | | |
| | 3. | | | | | | |
| | 4. | | | | | | |
| 14. Special Handling Instructions and Additional Information J165130WDI / PCB Soil | | | | | | | |
| 15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 252.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true. SSD: 11-2-16 | | | | | | | |
| Generator's/Officer's Printed/Typed Name James Calender | | Signature | | Month Day Year 11 2 16 | | | |
| 16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.: | | | | | | | |
| 17. Transporter Acknowledgment of Receipt of Materials | | | | | | | |
| Transporter 1 Printed/Typed Name Chris Grinnell | | Signature | | Month Day Year 11 2 16 | | | |
| Transporter 2 Printed/Typed Name | | Signature | | Month Day Year | | | |
| 18. Discrepancy | | | | | | | |
| 18a. Discrepancy Indication Space <input checked="" type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection | | | | | | | |
| 18b. Alternate Facility (or Generator) <i>Actual weight 20,464.16 lb per Patrick Whitehead at ENRCOR. AB1113116</i> Manifest Reference Number: U.S. EPA ID Number | | | | | | | |
| 18c. Signature of Alternate Facility (or Generator) Month Day Year | | | | | | | |
| 19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) | | | | | | | |
| 1. PCB | | 2. | | 3. | | 4. | |
| 20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18b. | | | | | | | |
| Printed/Typed Name Tanya Mowatt | | Signature | | Month Day Year 11 03 16 | | | |

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

FOR MANIFESTED PCB WASTE

This certificate is to verify the wastes identified as Residual and specified on Manifest # 010227149116, Line Item 1 has been landfilled on Nov 3, 2012 in accordance with all local, state and federal regulations by:

Wayne Disposal, Inc
(EPA I.D. # MIDD048090633)

49350 N. I-94 Service Drive, Belleville, Michigan 48111
Telephone: 1-800-KWALITY (592-5489)
Fax: 1-800-KWALIFAX (592-5329)

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who are acting under my direct instructions made the verification that this information is true accurate and complete.

Authorized Signature: *Paula R. Bennett*

CERTIFICATE OF DISPOSAL



US ECOLOGY 49350 N. I-94 SERVICE DRIVE BELLEVILLE, MICHIGAN 48111

From #REC-FM-030-BEL

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