4/30/97-00444

SAMPLING PLAN FOR
THE ST. JULIENS CREEK ANNEX FACILITY
CHESAPEAKE, VIRGINIA

EPA ID No. VA5170000181

Prepared for:

U.S. Environmental Protection Agency
Site Assessment and CEPP Section
841 Chestnut Street
Philadelphia, PA 19107

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1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), was tasked by the U.S. Environmental Protection Agency (EPA) to prepare a sampling plan for a site inspection (SI) at the St. Juliens Creek Annex Facility, Chesapeake, Virginia under EPA contract 68-S5-3002, technical direction document (TDD) 03-9702-23. EPA requested PRC to prepare a sampling plan to be used by the Department of the Navy, Atlantic Division (LANTDIV), Naval Facilities Engineering Command to direct future sampling activities at the St. Juliens Creek Annex Facility. The purpose of the sampling plan is to identify sample locations, samples, sample analysis, and non-sampling data needed to evaluate the facility with the Hazard Ranking System (HRS) and determine the need for additional investigation under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980 and the Superfund Amendments and Reauthorization Act of 1986 (SARA). A description of the non-sampling details is provided in Section 4.1. A description of the sample locations, samples, and sample analysis is provided in Section 4.2 and in the table in Appendix A.

To prepare the sampling plan, PRC reviewed documents provided by EPA (A.T. Kearney, Inc. 1989; CH2MHILL 1996; 1997a; 1997b; Navy 1981; NUS Corporation 1983; EPA 1995a). PRC did not conduct a site reconnaissance; therefore, pertinent source conditions may exist that have not been identified in the sampling plan, such as drainage ditches, that should be sampled. The sampling plan reflects conditions described in the documents reviewed and may not accurately reflect all the sample locations that should be sampled to assess the risks to human health and the environment posed by the facility. Therefore, the sampling plan should be modified during the sampling activities if site conditions warrant the variance.

Section 2.0 describes the objectives of the sampling plan. Section 3.0 provides a description of the contents of the SI report that should be prepared after receiving the analytical data. Section 4.0 presents the non-sampling and sampling data that should be collected during the SI. Section 5.0 describes the sampling and analysis plan, and Section 6.0 presents the quality assurance and quality control plan. The table in Appendix A, Proposed Source Samples and Data Collection, provides a summary of all samples to be collected. Appendix B, Figures 1 through 6 present the sample locations.

2.0 OBJECTIVES

Prior to preparing the sampling plan, PRC completed a preliminary ranking evaluation score (PREscore) using the HRS for the facility and identified the surface-water migration pathway as the primary pathway of concern. Therefore, the primary objectives of the sampling plan are to test for an observed release to the surface-water migration pathway and to determine whether any surface-water targets have been impacted.

The objective of collecting soil samples from the source areas is to determine the approximate area of soil contamination and to characterize the wastes contained in the soil. When collecting the samples, the sampler should try to obtain samples of waste materials deposited in the soil. The subsurface soils should be collected as composites from 0 to 2 feet below ground surface (bgs). The depth of 0 to 2 feet bgs is chosen because it is the depth used in the HRS for determining the area of soil contamination. However, if during sampling activities, samples must be collected at depths greater than 2 feet bgs to characterize the disposal of wastes in the source, samples should be obtained from the greater depth. The locations of the soil samples should be selected in such a way that the area of contaminated soil can be calculated. For example, if the contaminated soil samples are arranged in a straight line, the area of contaminated soil cannot be determined; however, if they are arranged in a triangular shape, then the area between the samples can be estimated.

The objective of collecting sediment samples from surface-water bodies or from areas draining to surface-water bodies is to determine whether sources have released hazardous substances to the surface-water migration pathway. No surface-water aqueous samples are identified in the sampling plan because sediment samples are more likely to contain contaminants from historical releases. However, if a surface-water sampling location is identified during field sampling activities that may characterize wastes contained in sources or may reveal a release to surface water, such as a leachate seep discharging to surface water, that sample should be collected.

3.0 CONTENTS OF THE SITE INSPECTION REPORT

The contents of the final SI report should follow the outline described in EPA (1992a) guidance for site inspections under CERCLA. In particular the report should contain the following information:

- Analytical parameters and methods used for analyzing the samples
- Detection limits
- Copy of the Form I data sheets
- Copy of the data validation report
- Copy of the field notes
- Operational and physical description of the each source, including the surface-water runoff route
- Description of the samples including their locations, depths, and types

Information gathered during the SI and documented in the SI report will be used to evaluate the site using the HRS. After the SI report is submitted, EPA shall determine if an HRS package should be prepared for the site, resulting in possible consideration for the National Priorities List (NPL).

4.0 SITE INSPECTION DATA

The following sections provide the non-sampling and sampling data that should be collected during the SI.

4.1 NON-SAMPLING DATA

Non-sampling data should be collected during the SI. The non-sampling data are needed to document sampling activities, identify and characterize migration pathways, and identify targets. The following non-sampling data should be collected:

- Photographs of site features and sampling locations
- Target information, including the distance to the nearest actively used building from each source; number of workers in the building; and target information for Blows Creek, St. Juliens Creek, the South Branch of the Elizabeth River, and the Elizabeth River (including the presence of federal and state endangered and threatened species, location and size of wetlands, and any surface-water bodies used for commercial and recreational fishing)
- Documentation of sample collection procedures

- Description of the samples and the sample locations
- Documentation of the locations of background samples collected for each media (surface water, soil, and sediment)
- Documentation of the type of sample (soil, sediment, or waste)
- Documentation of the time and date that the sample was collected
- Documentation of the analytical parameter for which the sample was analyzed
- Description of the current conditions of the source
- Identification of the surface-water runoff route from the source to the final discharge point, such as a storm sewer
- Description of any pertinent source features such as the distance to the nearest building and access restrictions
- Completion of a storm sewer investigation
- Completion of an overland drainage ditch investigation

A storm sewer investigation should be conducted as part of the SI, and the findings should be presented in the SI report. The findings should include a copy of the storm sewer system plan, the flow pattern within the sewer, the buildings and areas that drain to the storm sewer, the location where the buildings and area drain into the storm sewer, and the outfalls to which the storm sewer discharges. The findings should contain the information needed to identify the outfall to which the specific buildings and areas discharge.

A.T. Kearney, Inc. (1989) discusses the presence of a series of overland drainage ditches that were used for transport of process wastewaters and runoff from process areas. The location of the drainage ditches and the source of the process wastewaters were not identified in the report. Additional information should be collected on the drainage ditches to determine whether they are sources of potential contamination and to determine whether they have released or are releasing hazardous substances to surface water. That information should include the discharge locations of the drainage ditches.

A.T. Kearney, Inc. (1989) indicated that wastes from building floor drains were directed to the sanitary sewer system. The sanitary sewer system therefore is a potential source of contamination to surface water and groundwater. LANTDIV should consider conducting an investigation of the sanitary sewer system.

CH2MHILL's 1996 analytical data for sources located on the St. Juliens Annex facility were used to evaluate the need for additional sampling for many of the sources. EPA can use the data provided in this report for HRS purposes if the data package, validation reports, and detection limits are provided. Also, background sample locations should be identified. If this information is available, it should be provided to EPA. However, if these data are not available, then additional sampling not specified in this sampling plan may be needed for some of the sources.

4.2 SAMPLING DATA

Thirteen primary sources of potential contamination to the surface-water migration pathway including 35 outfalls (as one source) have been identified on the facility. The table provided in Appendix A provides a summary of the proposed source sample locations and non-sampling data needed to determine the risk posed by the source to human health and the environment. The source sample location maps appear in Appendix B. A background sample should be collected for each medium (surface water, sediment, and soil) and for each surface-water body sampled. Multiple background samples may be needed. EPA provides guidance for site inspections under CERCLA (1992a) and HRS guidance on selecting the number and location of background samples (EPA 1992b; 1995b; 1995c; and 1995d). Those locations should be identified during field sampling activities to ensure that the locations are representative of background conditions. Background samples should be as similar as possible to release samples. For the groundwater migration pathway, for example, background and release samples should be obtained from the same aquifer(s). Background locations are not identified in the sampling plan.

It is recommended that a sediment sample be collected at the point at which each of the 35 outfalls discharges to surface water. To conserve resources, however, LANTDIV may decide to conduct a two-phase investigation. The first phase would include conducting a sampling investigation of the surface-water body in which the outfalls discharge. For example, if 10 outfalls discharge to Blows

Creek, sediment samples could be placed strategically to identify any release to Blows Creek from the outfalls. A background sample taken upstream of the outfalls and several samples taken downstream of the outfalls samples could document a release to Blows Creek, potentially limiting the number of sediment samples to about five. A second phase of the investigation would not be needed if contamination could not be found in the downstream sediment samples from Blows Creek. However, if contamination is identified, the collection of additional sediment samples may be necessary to determine the source of the contamination or to identify the outfall or source from which the release occurred.

5.0 SAMPLE ANALYSIS

All samples should be have contract laboratory program (CLP) target compound list organic analysis and target analyte list inorganic analysis following the CLP statement of work (SOW) or CLP-equivalent SOW.

6.0 QUALITY ASSURANCE AND QUALITY CONTROL PLAN

Described in the following sections are the quality assurance and quality control activities that should be followed for this sampling event. All sample collection, preparation, and chain-of-custody procedures used during sampling activities should be conducted in accordance with the following EPA guidance:

- EPA. "A Compendium of Superfund Field Operations Methods." Office of Emergency and Remedial Response. OSWER Directive 9355.0-14. EPA/540/P-87/001. December 1987.
- EPA. Office of Emergency and Remedial Response. "Data Quality Objectives Process for Superfund." EPA/540/R-93/078. PB94-963204. September 1993.

6.1 FIELD QUALITY CONTROL

Field duplicate samples should be collected for each matrix sampled (surface water, sediment, and soil). The field duplicate sample will test the precision of sampling procedures and results. Matrix

spike and matrix spike duplicate samples should be collected for each sample matrix. Field blank and trip blank samples should be collected for the detection of contaminated containers, preservatives, errors in sampling protocol, or ambient field contamination.

6.2 LABORATORY QUALITY CONTROL

Laboratory quality control should include analyzing matrix spikes at a rate of one per matrix per 20 samples, matrix spike duplicates at a rate of one per matrix per 20 samples, calibration data, method blank analysis at a rate of one analysis per matrix, and CLP forms and deliverables.

REFERENCES

A.T. Kearney, Inc. 1989. "Phase II RCRA Facility Assessment of the St. Juliens Creek Annex Facility, Chesapeake, Virginia (EPA I.D. No. VA5 170000181)." March.

CH2MHILL. 1996. "Final Relative Risk Ranking System Data Collection Report, St. Juliens Creek Annex to the Norfolk Naval Base, Chesapeake, Virginia." April 23.

CH2MHILL. 1997a. "Draft Final Work Plan and Sampling and Analysis Plan for the Remedial Investigation and Feasibility Study - Landfill C (Site 3) and Landfill D (Site 4)." January 28.

CH2MHILL. 1997b. "Draft Final Work Plan - Landfill B (Site 3) and Burning Grounds (Site 5) - Remedial Investigation and Feasibility Study. St. Juliens Creek Annex, Chesapeake, Virginia." January 29.

Department of the Navy, Naval Energy and Environmental Support Activity. 1981. "Navy Assessment and Control of Installation Pollutants: Initial Assessment Study of St. Juliens Annex, Norfolk Naval Shipyard, Portsmouth, Virginia." August.

NUS Corporation. 1983. "Final Report of Norfolk Naval Shipyard St. Juliens Annex." August 11.

U.S. Environmental Protection Agency (EPA). 1987. "A Compendium of Superfund Field Operations Methods." Office of Emergency and Remedial Response. OSWER Directive 9355.0-14. EPA/540/P-87/001. December.

EPA. 1992a. "Guidance for Performing Site Inspections Under CERCLA. Interim Final." EPA/540-R-92-021. PB9345.1-05. September.

EPA. 1992b. "Hazard Ranking System Guidance Manual. Interim Final." EPA/540-R-92-026. PB92-963377. September.

EPA. 1993. "Data Quality Objectives Process for Superfund." Prepared by the Office of Emergency and Remedial Response. EPA/540/R-93/078. PB94-963204. September.

EPA. 1995a. Aerial Photograph Site Analysis, Norfolk Naval Shipyard: Annex Areas, Norfolk, Virginia. February.

EPA. 1995b. "Establishing Areas of Observed Contamination." Prepared by the Office of Solid Waste and Emergency Response. EPA/540/F-94/029. PB94-963312. September.

EPA. 1995c. "Establishing Background Levels." Prepared by the Office of Solid Waste and Emergency Response. EPA/540/F-94/030. PB94-963313. September.

EPA. 1995d. "Establishing an Observed Release." Prepared by the Office of Solid Waste and Emergency Response. EPA/540/F-94/031. PB94-963314. September.

APPENDIX A

PROPOSED SOURCE SAMPLES AND DATA COLLECTION

TABLE A-1

PROPOSED SOURCE SAMPLES AND DATA COLLECTION

Source	Non-sampling data	Sample Location [1]	Sample Description
Dump A (Source 1)	Determine the approximate area of the source, the size of wetlands within the source, and the surface runoff drainage pattern. Determine the status of buildings 237 and 238 (whether they are active) and the number of workers within each building.	SS1-1 through SS1-3 (see Figure 1)	Collect surface soil or waste (if available) samples from three locations within the area of Dump A.
		SB1-1 through SB1-3 (see Figure 1)	Collect composite subsurface soil or waste (if available) samples from three locations within the area of Dump A. The depth of the sample should be from 0 to 2 feet below ground surface (bgs).
		SED1-1 through SED1-3 (see Figure 1)	Collect three sediment samples in Blows Creek: one upstream (SED1-1), one adjacent to (SED1-2), and one downstream (SED1-3) of Dump A.
Landfill B (Source 2)	Determine the size of wetlands within the source and the surface runoff drainage pattern. Determine the location to which the drainage ditch discharges.	SS2-1 through SS2-9 (see Figure 2)	Collect surface soil or waste (if available) samples from nine locations inside and outside of the area of Landfill B.
		SB2-1 through SB2-3 (see Figure 2)	Collect composite subsurface soil or waste (if available) samples from three locations within the area of Landfill B. The depth of the sample should be from 0 to 2 feet bgs.

TABLE A-1 (Continued)

PROPOSED SOURCE SAMPLES AND DATA COLLECTION

Source	Non-sampling data	Sample Location [1]	Sample Description
Landfill B (Source 2) (continued)		SED2-1 through SED2-3 (see Figure 2, SED2-3 not shown)	Collect three sediment samples in St. Juliens Creek: two adjacent to Landfill B (SED2-1 and SED2-2) and one background sample (SED2-3) to be identified during field sampling.
Landfill C (Source 3)	Determine the size of wetlands within the source and the surface runoff drainage pattern. From field observations, determine the boundaries of the source, and provide them on a figure. Review aerial photographs to determine the location of the two disposal pits.	SS3-1 through SS3-10 (see Figure 3)	Collect surface soil or waste (if available) samples from ten locations within the area of Landfill C.
		SB3-1 and SB3-2 (see Figure 3)	Collect composite subsurface soil or waste (if available) samples from two locations within the area of Landfill C. The depth of the sample should be from 0 to 2 feet bgs.
		SED3-1 and SED3-6 (see Figure 3)	Collect three sediment samples in the Southern Branch of the Elizabeth River where surface-water runoff from the source flows. If surface-water runoff from the site does not flow to the Elizabeth River, these samples should not be collected. Collect two samples adjacent to Landfill C (SED2-1 and SED2-2) and one background sample (SED2-3) to be identified during field sampling. Collect three sediment samples from depressional areas on the landfill.

TABLE A-1 (Continued)

PROPOSED SOURCE SAMPLES AND DATA COLLECTION

Source	Non-sampling data	Sample Location [1]	Sample Description
Landfill D (Source 4)	Determine the surface runoff drainage pattern from the source, and identify any drainage structures and the locations to which they discharge. Identify any wetlands within the source and their size.	SS4-1 through SS4-7 (see Figure 4)	Collect surface soil or waste (if available) samples from seven locations within the area of Landfill D.
		SB4-1 and SB4-2 (see Figure 4)	Collect composite subsurface soil or waste (if available) samples from two locations within the area of Landfill D. The depth of the sample should be from 0 to 2 feet bgs.
		SED4-1 through SED4-7 (see Figure 4, SED4-4 not shown)	Collect five sediment samples in St. Juliens Creek: three adjacent to Landfill D (SED4-1 and SED4-3), one at a tributary of Blows Creek (SED4-5), and one background sample (SED4-4) to be identified during field sampling.
Burning Grounds (Source 5)	Determine the surface runoff drainage pattern from the source, and identify any drainage structures and the locations to which they discharge. From field observations, determine the boundaries of the source, and provide them on a figure. Measure the distance from the source to Blows Creek.	SS5-1 through SS5-10 (see Figure 5)	Collect surface soil or waste (if available) samples from ten locations from the area of the burning grounds.

TABLE A-1 (Continued)

PROPOSED SOURCE SAMPLES AND DATA COLLECTION

Source	Non-sampling data	Sample Location [1]	Sample Description
Burning Grounds (Source 5) (continued)		SB5-1 (see Figure 5)	Collect composite subsurface soil or waste (if available) samples from one location from the area of the burning grounds. The depth of the sample should be from 0 to 2 feet bgs.
		SED5-1 through SED5-3 (see Figure 5)	Collect three sediment samples from depressional areas within the burning grounds. If surface-water runoff from the source flows to Blows Creek, collect a sediment sample at the point at which the runoff enters Blows Creek. An upstream and downstream sample from this point also should be collected.
Building 163Y (Source 6)	Determine the surface runoff drainage pattern from the source, and identify any drainage structures and the location to which they discharge.	To be determined in the field (no figure provided)	Collect three surface soil samples from the area outside of Building 163Y where the building's floor troughs discharge.
Building 53 Soil (Source 7)	Determine the surface runoff drainage pattern from the source, and identify any drainage structures and the locations to which they discharge.	No samples	Do not collect samples.
Building 323 Soil (Source 8)	Determine the surface runoff drainage pattern from the source, and identify any drainage structures and the locations to which they discharge.	To be determined in the field (no figure provided)	Collect three samples of blasting grit on the ground surface outside of Building 323. If no blasting grit is observed, collect three surface soil samples from the soil surrounding the former building.

TABLE A-1 (Continued)

PROPOSED SOURCE SAMPLES AND DATA COLLECTION

Source	Non-sampling data	Sample Location [1]	Sample Description
Building 271 Soil (Source 9)	Determine the surface runoff drainage pattern from the source, and identify any drainage structures and the locations to which they discharge.	To be determined in the field (no figure provided)	Collect three soil samples from soil stained areas. The samples should be composited from 0 to 2 feet bgs.
		To be determined in the field (no figure provided)	Collect three sediment samples from St. Juliens Creek: one from the point at which surface-water runoff from the source discharges to St. Juliens Creek, one downstream from the point, and one upstream from this point.
Building 266 (Source 10)	Determine the surface runoff drainage pattern from the source, and identify any drainage structures and the locations to which they discharge.	SS10-1 through SS10-4 (see Figure 6)	Collect four soil samples from 0 to 2 feet bgs from the area surrounding Building 266.
DRMO Storage area (Source 11)	Determine the surface runoff drainage pattern from the source, and identify any drainage structures and the locations to which they discharge.	No samples	Do not collect samples.

TABLE A-1 (Continued)

PROPOSED SOURCE SAMPLES AND DATA COLLECTION

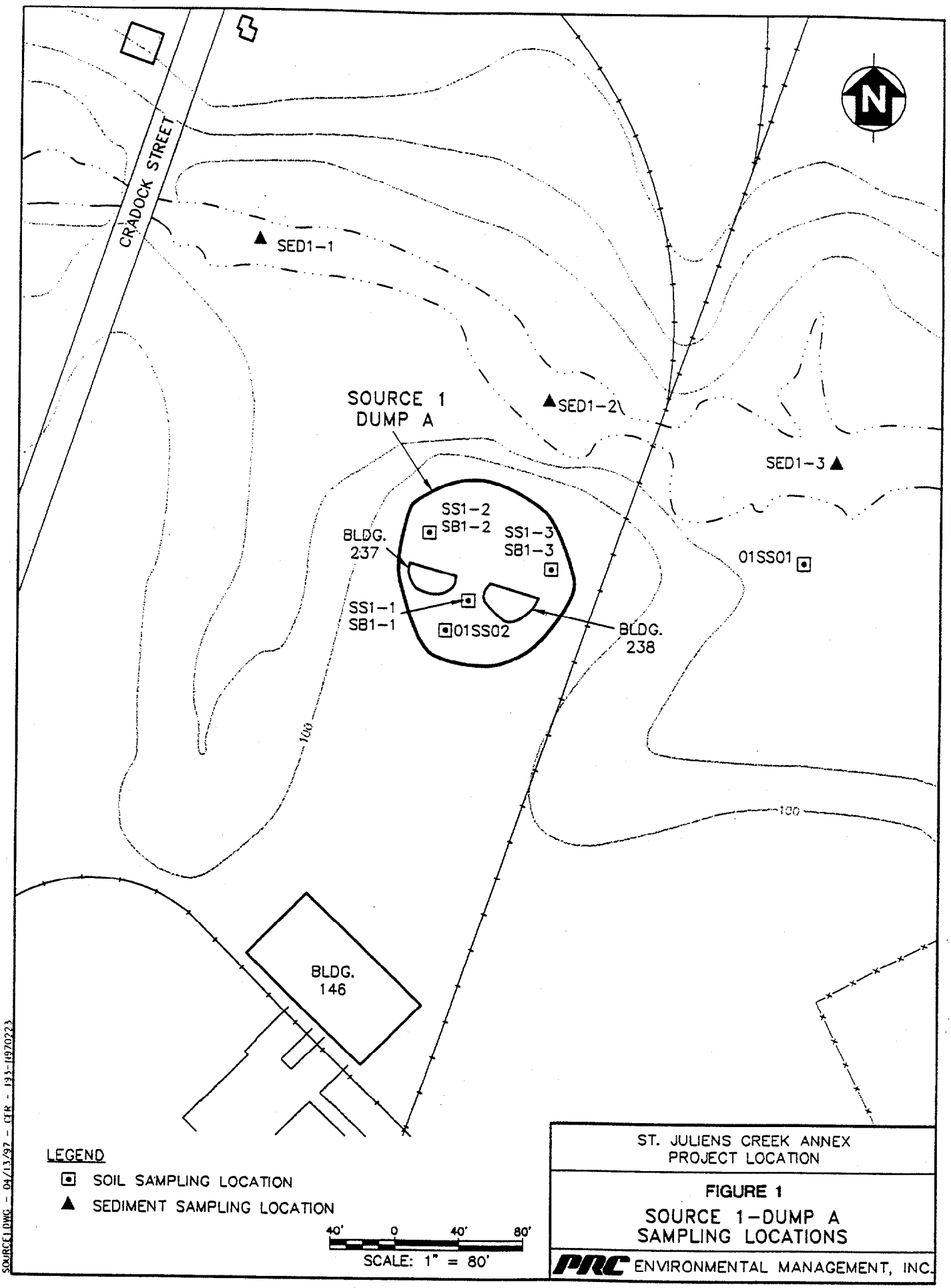
Source	Non-sampling data	Sample Location [1]	Sample Description
Building M-5 (Source 12)	Determine the surface runoff drainage pattern from the source, and identify any drainage structures and the locations to which they discharge. Determine the source of polychlorinated biphenyls detected in soil samples obtained from the source. Provide a description of the operations conducted in this area.	No sample locations identified (no figure provided)	If surface-water runoff from the source flows to the Southern Branch of Elizabeth River, collect sediment samples from the point at which the runoff discharges to surface water and from locations upstream and downstream from that point.
35 storm water outfalls (Source 13)	As discussed in Section 4.1, conduct an investigation of the entire storm water drainage system.	To be determined (no figure provided); no available locations of the outfalls	Collect one sediment sample at each outfall location. Collect at least one background sediment sample for each surface-water body in which an outfall discharges. See Section 4.2 for a discussion on the collection of outfall sediment samples.

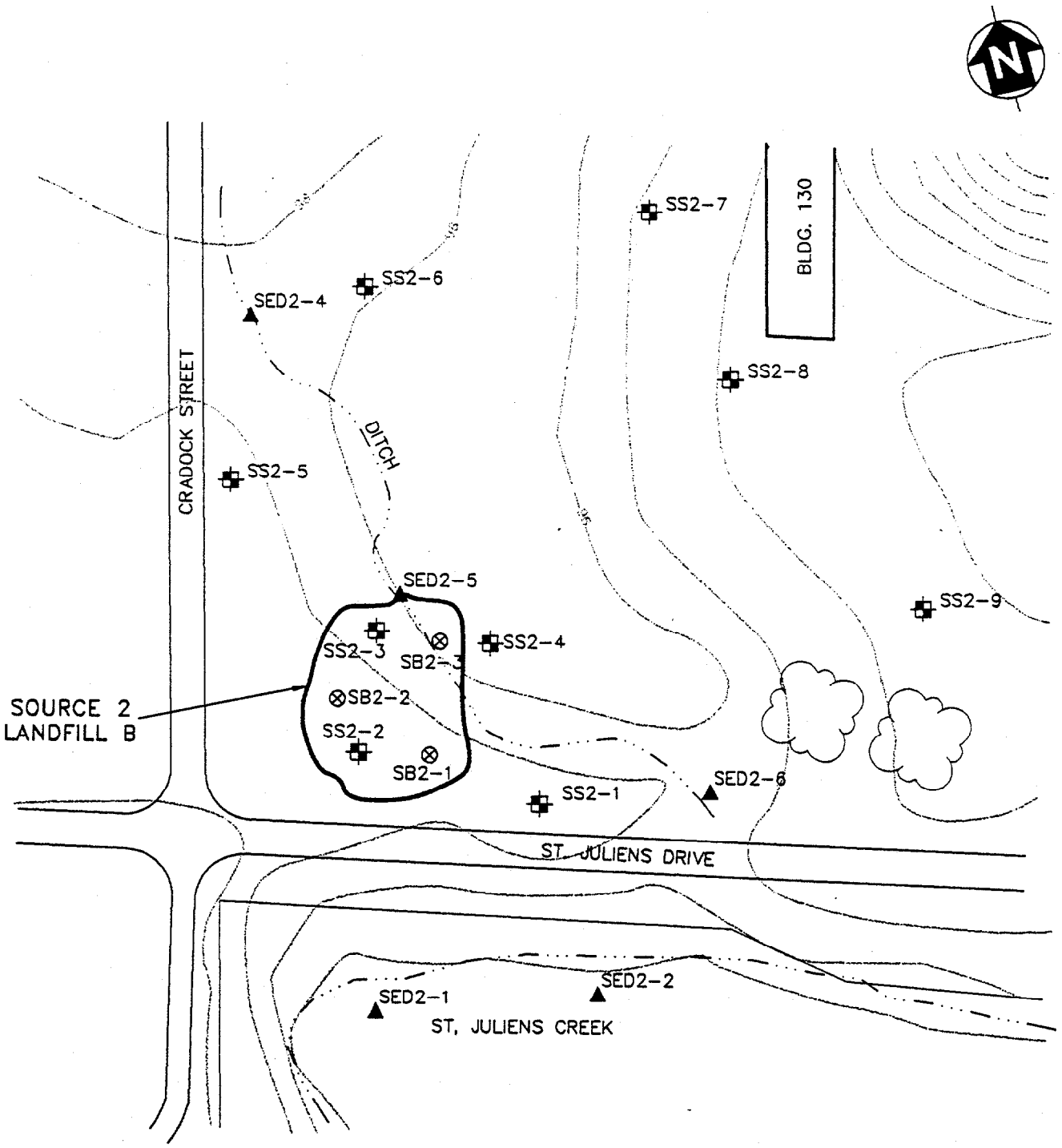
Notes:

[1] Background surface and subsurface soil and sediment samples should be collected. The locations should be identified during field sampling and are not shown on the sampling location figures. The following EPA guidance should be followed when selecting the locations: "Guidance for Performing Site Inspections Under CERCLA, Interim Final,"(1992a); "Hazard Ranking System Guidance Manual." (1992b); " Establishing Areas of Observed Contamination" (1995b); "Establishing Background Levels" (1995c); and "Establishing an Observed Release" (1995d).

APPENDIX B

FIGURES


CRADOCK STREET
SED1-1
SOURCE 1
DUMP A
SED1-2
SED1-3
SS1-2
SB1-2
SS1-3
SB1-3
BLDG.
237
01SS01
SS1-1
SB1-1
01SS02
BLDG.
238
100
BLDG.
146
LEGEND
SOIL SAMPLING LOCATION
SEDIMENT SAMPLING LOCATION
40' 0 40' 80'
SCALE: 1" = 80'
ST. JULIENS CREEK ANNEX
PROJECT LOCATION
FIGURE 1
SOURCE 1-DUMP A
SAMPLING LOCATIONS
PRC ENVIRONMENTAL MANAGEMENT, INC.
SOURCE1.DWG - 04/13/97 - CER - 193-11970223



NOTE: SED2-3 IS NOT SHOWN.

LEGEND

- SURFACE SOIL SAMPLING LOCATION
- ⊗ COMPOSITE SOIL SAMPLING LOCATION (0-2')
- ▲ SEDIMENT SAMPLING LOCATION

40' 0 40' 80'

SCALE: 1" = 80'

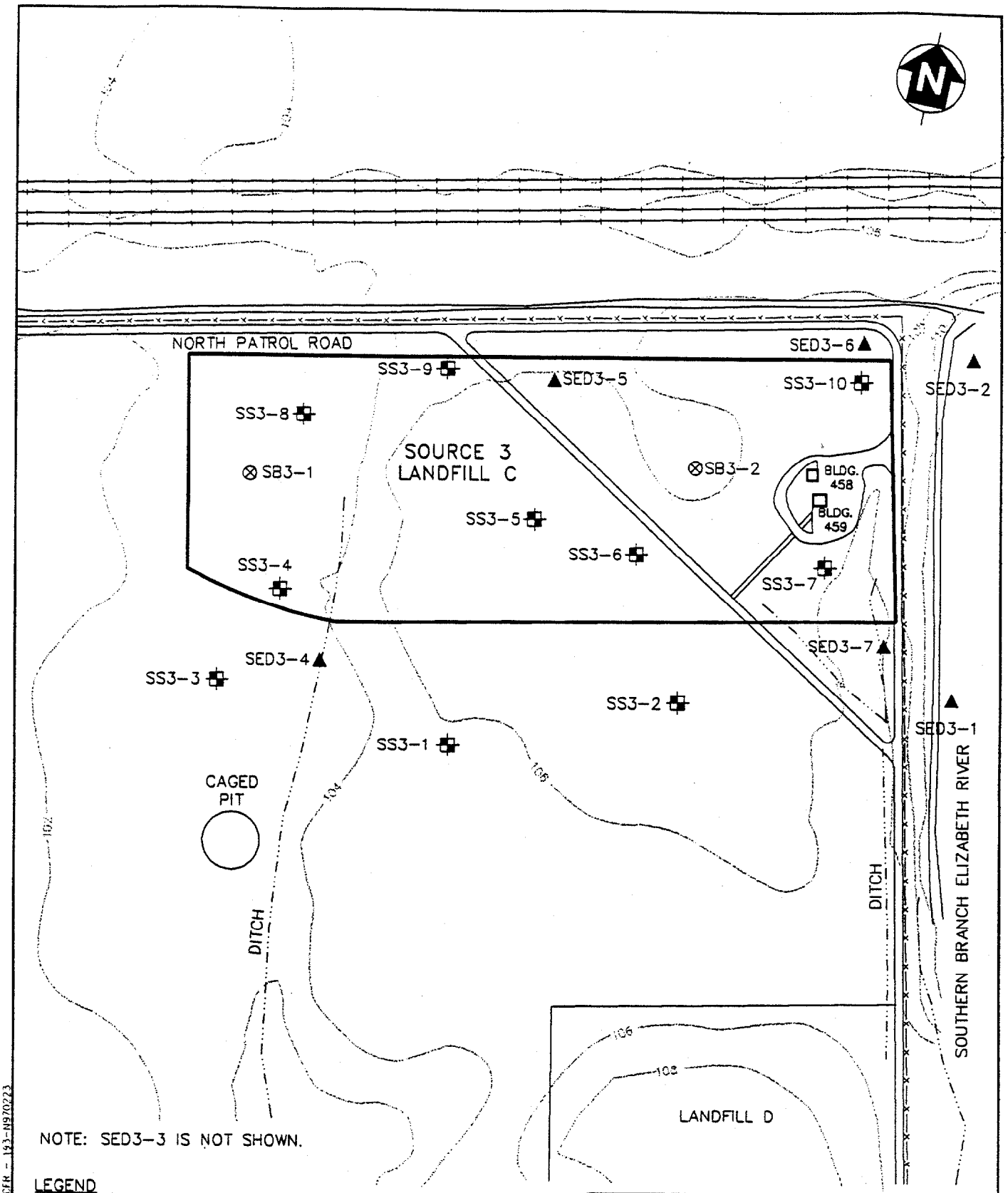
ST. JULIENS CREEK ANNEX
PROJECT LOCATION

FIGURE 2

SOURCE 2-LANDFILL B
SAMPLING LOCATIONS

PRC ENVIRONMENTAL MANAGEMENT, INC.

SOURCE2.DWG - 04/15/97 - CFR - 193-N970223



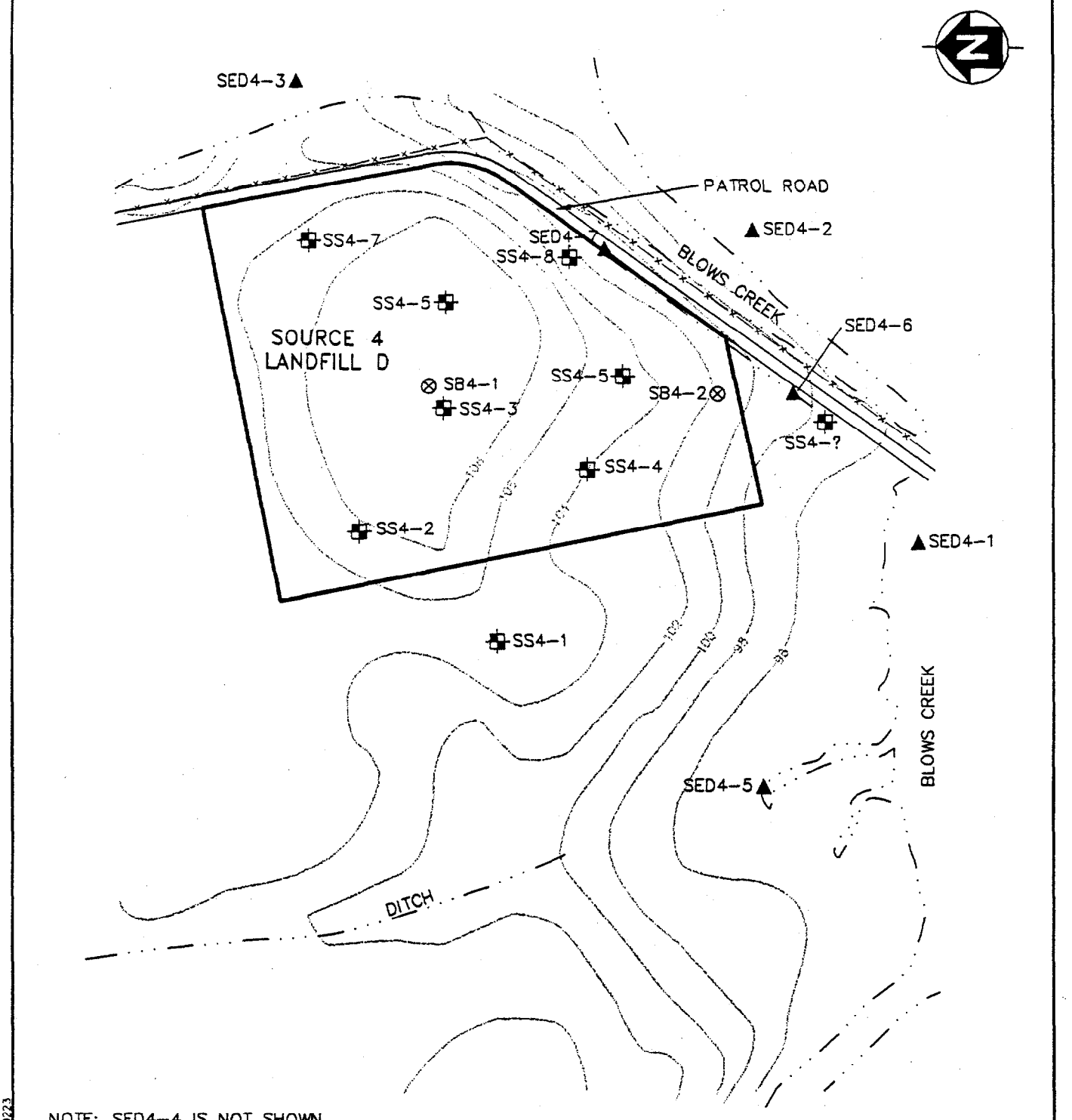
ST. JULIENS CREEK ANNEX
PROJECT LOCATION

FIGURE 3

SOURCE 3-LANDFILL C
SAMPLING LOCATIONS

PRC ENVIRONMENTAL MANAGEMENT, INC.

SOURCE3.DWG - 04/13/97 - CFH - 193-N970223



NOTE: SED4-4 IS NOT SHOWN.

LEGEND

- SURFACE SOIL SAMPLING LOCATION
- COMPOSITE SOIL SAMPLING LOCATION (0-2')
- SEDIMENT SAMPLING LOCATION

75' 0 75' 150'

SCALE: 1" = 150'

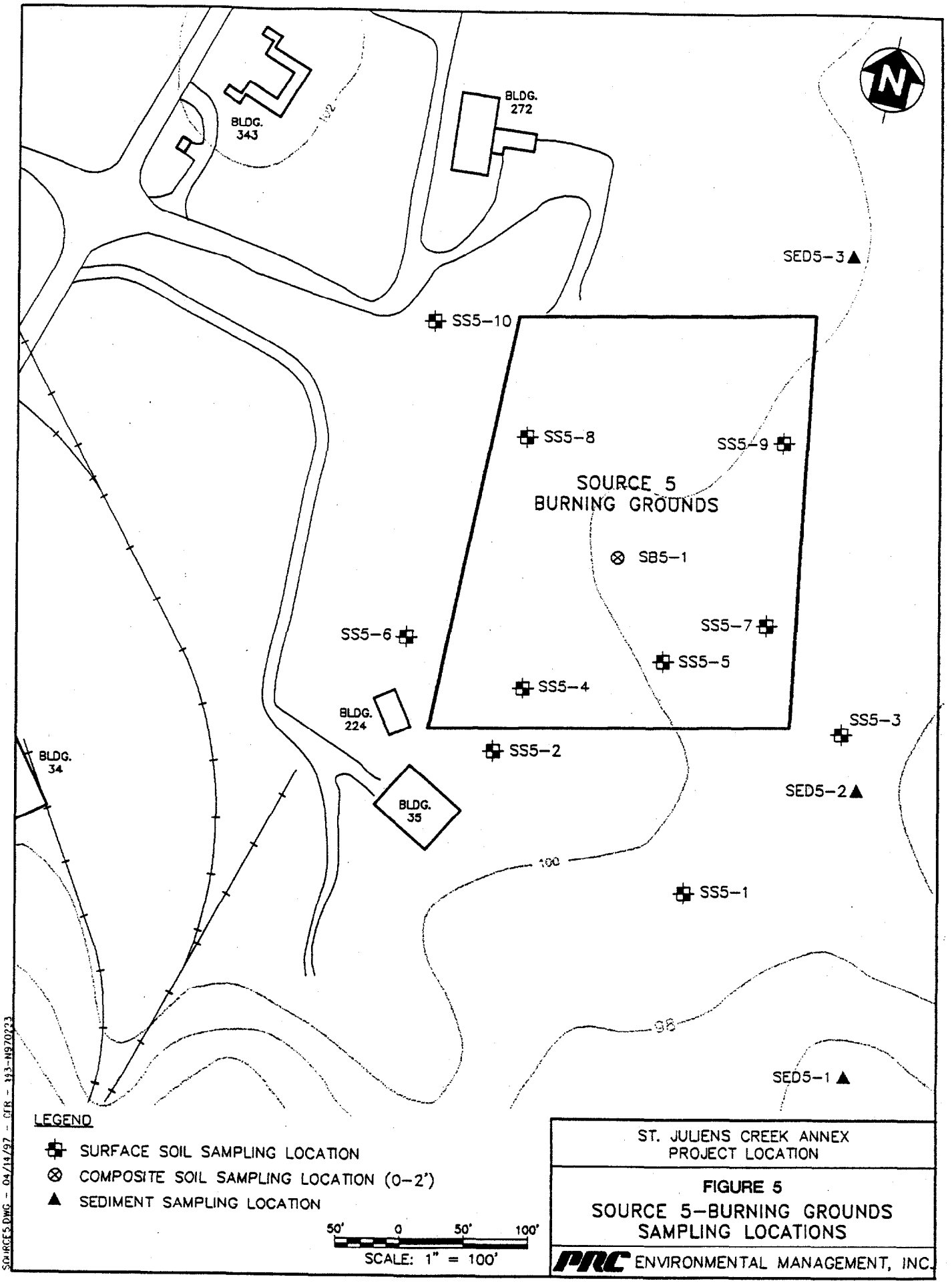
ST. JULIENS CREEK ANNEX
PROJECT LOCATION

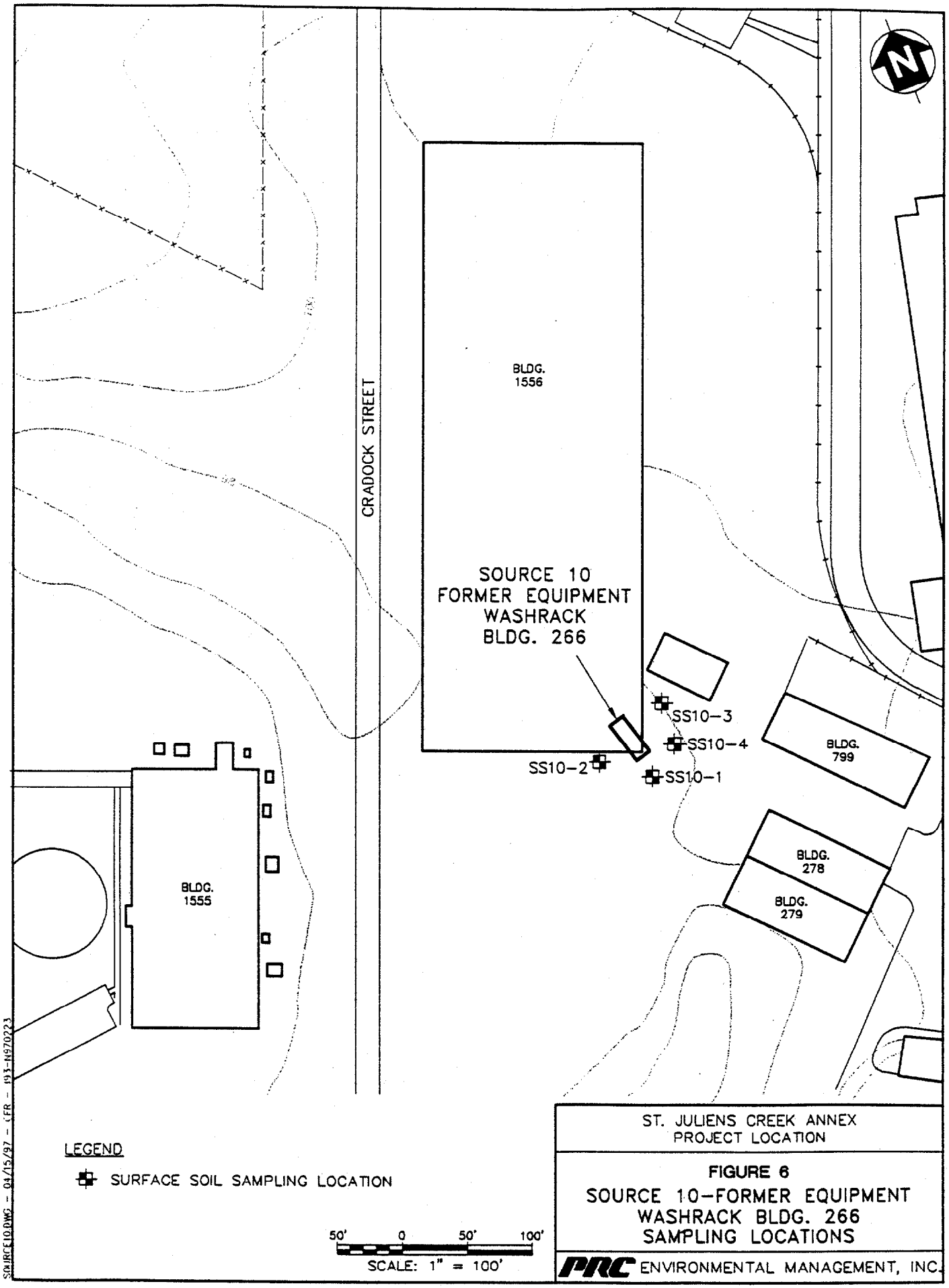
FIGURE 4

SOURCE4-LANDFILL D
SAMPLING LOCATIONS

PRC ENVIRONMENTAL MANAGEMENT, INC.

SOURCE4.DWG - 04/15/97 - CFR - 183-N970223


BLDG. 343
BLDG. 272
SED5-3
SS5-10
SS5-8
SS5-9
SOURCE 5
BURNING GROUNDS
SB5-1
SS5-6
SS5-7
SS5-5
SS5-4
BLDG. 224
SS5-3
SS5-2
BLDG. 34
BLDG. 35
SED5-2
100
SS5-1
98
SED5-1
LEGEND
SURFACE SOIL SAMPLING LOCATION
COMPOSITE SOIL SAMPLING LOCATION (0-2')
SEDIMENT SAMPLING LOCATION
50' 0 50' 100'
SCALE: 1" = 100'
ST. JULIENS CREEK ANNEX
PROJECT LOCATION
FIGURE 5
SOURCE 5-BURNING GROUNDS
SAMPLING LOCATIONS
PRC ENVIRONMENTAL MANAGEMENT, INC.
SOURCE5.DWG - 04/14/97 - CFR - 113-N970223


BLDG.
1556
CRADOCK STREET
SOURCE 10
FORMER EQUIPMENT
WASHRACK
BLDG. 266
SS10-3
SS10-4
SS10-2
SS10-1
BLDG.
799
BLDG.
278
BLDG.
279
BLDG.
1555
LEGEND
SURFACE SOIL SAMPLING LOCATION
50' 0 50' 100'
SCALE: 1" = 100'
ST. JULIENS CREEK ANNEX
PROJECT LOCATION
FIGURE 6
SOURCE 10-FORMER EQUIPMENT
WASHRACK BLDG. 266
SAMPLING LOCATIONS
PRC ENVIRONMENTAL MANAGEMENT, INC.
SOURCE10.DWG - 04/15/97 - CFR - 193-N970223