

Phase I & II Environmental Site Assessment
1146 Haskell Avenue
Lawrence, Kansas
September 2013

Section 1.0 - Executive Summary

This Phase I & II Environmental Site Assessment (ESA) was conducted in accordance with the standards set forth in the ASTM E1527-05 and ASTM E1903-97 (2002) guidance documents for conducting Phase I and Phase II ESAs. The site visit and field activities were conducted on August 27, 2013, and research of documents and databases associated with the site and adjoining properties were conducted prior and subsequent to the site visit.

The following summary of findings was obtained during development of this Phase I and Phase II ESA. Details regarding these findings are included in the report text.

- The subject facility is within a mixture of land that is zoned for general public use and residential property.
- There are four buildings on the subject property and one ramp for loading and unloading equipment/materials.
- Historical aerial photographs indicate no apparent significant changes in the property development from the mid-1950s when most of the buildings were built. One garage and one ramp were built later in the 1980s or 1990s before the current property owner purchased the property. Prior to development, the property was a vacant lot.
- It has been operating as a recycling and bargain center since 2003. Prior to that, the subject property was primarily used for auto service, lawn care service, salvage, and parts storage and sales.

- Several containers were observed during the site visit that indicate the past use and/or storage of chemicals on the property. Most of the containers ranged in size from one to five gallons and were partially full and had labels intact. There was one 55-gallon drum filled with waste oil. The smaller containers that were observed included paint and weatherproofing products and automotive products such as fuel and transmission fluid. One pesticide type application bottle was observed, but the contents could not be identified. Additionally, pallets of scrap metal and household batteries were observed in the east garage. The property owner indicated all of these items would be removed and properly handled or disposed prior to sale of the property.
- Pieces of debris were observed scattered over the majority of the property. The pieces are generally small in size (less than approximately 6-inches) and included auto parts, glass, and other unidentifiable items. Much of the small debris is embedded in the soil. Additionally, there are several large piles of asphalt and rock near the north central portion of the property.
- Areas of staining were observed on the floors of the buildings and in one small area of soil/gravel north of the east garage.
- A previous property owner has indicated that lawn care and electrical businesses have also operated on the property. Details concerning the operations of these businesses could not be determined. It is unknown what types of chemicals were stored, used, and handled on the property at that time.
- On August 27, 2013, four soil samples were collected from the subject property and analyzed for 65 VOCs, 8 heavy metals, gasoline and diesel range organics (TPH-GRO and TPH-DRO), and 21 pesticides. These analyses were completed due to the use and storage of automotive related chemicals on the property and the possible storage of lawn chemicals. Three of the samples were collected in areas

where activities associated with recycling and maintenance were conducted. One soil sample was collected at the southwest corner of the property upgradient from these activities.

- All four soil samples exhibited concentrations of heavy metals. One soil sample (SB4 at 6-8 ft deep) also exhibited TPH-DRO and trace amounts of two VOCs (acetone and methyl ethyl ketone (MEK)). None of the concentrations exceeded non-residential or residential standards set by KDHE. Metals can naturally occur in soils; therefore, the levels detected may be background concentrations or may be impact from previous activities.
- An attempt to collect groundwater samples was not successful. The test holes did not produce water; therefore, one runoff water sample was collected from a topographically low spot in the general vicinity that was used to disassemble and recycle equipment. The sample was analyzed for 65 VOCs, 8 heavy metals, TPH-GRO, TPH-DRO, 21 pesticide compounds, and poly-aromatic hydrocarbons (PAHs).
- The runoff water sample exhibited concentrations of fluorene, arsenic, barium, and TPH-DRO. The concentration of TPH-DRO indicates the likelihood of automotive fuels and/or oils present in and up gradient of the runoff collection area.
- The U.S. Aerometric Information Retrieval System Facility Subsystem (AIRS (AFS)) database has listed the 12th & Haskell Recycle Center facility in violation for procedural noncompliance for potential uncontrolled chlorofluorocarbon (CFC) emissions less than 100 tons per year related to tracking CFC related waste. The exact type of violation could not be confirmed at the time of this report; however, no fines were assessed and no enforcement of violations was recorded.

- Records from the Kansas Department of Health and Environment (KDHE) and the Environmental Protection Agency (EPA) were reviewed as part of this ESA. Information from these sources indicated that seven complaints concerning environmental issues at the subject facility have been documented and investigated by the KDHE from February 2005 to January 2011. The complaints ranged from chemical odors, possible illegal burning, spillage, waste handling, and fires on the property. Three of the six complaints could be substantiated and violations were cited for two of them. No monetary fines were assessed. The facility addressed the violations and KDHE indicated the violations were corrected.
- On February 3, 2010, the KDHE issued to the 12th & Haskell Bargain Center an *Emergency Order to Eliminate Hazard and To Cease and Desist Unlawful Activity*. The Order cited two violations of unlawful disposal of hazardous and solid waste. The facility owner was ordered by KDHE to take numerous steps to prevent hazardous conditions from continuing and to maintain documentation that tracks the handling of hazardous fluids, waste, and materials from salvaged vehicles, and the disposal of all waste generated from the salvage operation. As of April 28, 2010, KDHE considered all violations to be corrected by the facility.
- On January 31, 2011, a Notice of Non-Compliance (NONC) was issued by KDHE to 12th & Haskell Bargain Center for unlawful disposal of hazardous waste and failure to determine if a waste is hazardous. The facility addressed the violations to the satisfaction of KDHE as of April 20, 2011.
- Additional comments from KDHE officials who investigated complaints against the 12th & Haskell Bargain Center include concern about the proper disposal of refrigerant which contains CFCs and electrical ballasts which could potentially contain polychlorinated biphenyls (PCBs). The property owner indicated that the refrigerant was removed by a certified technician using a CFC extraction unit.

- Regulatory records concerning active, inactive, and closed underground storage tank (UST) and aboveground storage tank (AST) facilities within a ½ mile radius indicate that there are four facilities which have had USTs removed, two of which have active USTs, and one of which had a reported release of petroleum. Two of the properties are adjacent to the subject facility or within a 1/8 mile radius.
- Regulatory records also indicate that there are five facilities within a one mile radius that are listed on the Kansas Department of Health and Environment (KDHE) Identified Site List (ISL). The sites include two mercury spills that have been resolved; a Department of Defense (DOD) property that has been resolved; a site with heavy metals, volatile organic compounds (VOCs), and polyaromatic hydrocarbons (PAHs) that has been resolved with restrictions; and an active site that is currently undergoing remediation for nitrate, pesticide, and VOCs.

The following opinions and recommendations are made based on the findings and conclusions gathered during this Phase I and II ESA:

- There is a potential for subsurface contamination on the subject property due to the historically documented use of the property as an automotive salvage and servicing facility, a recycling facility, and a storage area for lawn chemicals. It is unknown how waste fluids were historically disposed on the subject property. Additional subsurface investigation would be needed to thoroughly document the environmental conditions on the property and within the buildings.
- Many containers were found on the subject property containing various substances including: used motor oil, paint, paint and lacquer thinner, weatherproofing, gasoline, and possible pesticides. These need to be properly disposed or labeled and stored correctly.
- Other items remaining on the property such as the fluorescent lights, scrap metal, batteries, and piles of asphalt and rock need to be recycled or disposed. The

surface layer of soil may need to be disposed of due to the amount of small debris embedded within it.