



December 14, 2021

Mr. Michael Davis
On-Scene Coordinator
U.S. Environmental Protection Agency
8600 NE Underground Drive, Pillar 253
Kansas City, Missouri 64161

Subject: Trip Report
Dempster Industries Site – Beatrice, Nebraska
EPA ID No. NED007282486
U.S. EPA Region 7 START 5, Contract No. 68HE0719D0001
Task Order No. 21F0136
Task Monitor: Michael Davis, On-Scene Coordinator

Dear Mr. Davis:

Tetra Tech, Inc. submits the enclosed Trip Report for removal action support at the Dempster Industries site in Beatrice, Nebraska. If you have any questions or comments regarding this submittal, please contact the START Project Manager at [REDACTED].

Sincerely,

A handwritten signature in black ink that reads 'John R. Simpson'.

John R. Simpson
START Project Manager

A handwritten signature in blue ink that reads 'Ted Faile'.

Ted Faile, PG, CHMM
START Program Manager

Enclosures



40581207

TRIP REPORT

**REMOVAL ACTION SUPPORT
DEMPSTER INDUSTRIES SITE – BEATRICE, NEBRASKA
EPA ID No. NED007282486**

**Superfund Technical Assessment and Response Team (START) 5
Contract No. 68HE0719D0001, Task 21F0136**

Prepared For:

U.S. Environmental Protection Agency
Region 7
11201 Renner Boulevard
Lenexa, Kansas 66219

December 14, 2021

Prepared By:

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1.0 INTRODUCTION

The U.S. Environmental Protection Agency (EPA) Region 7 Superfund Division tasked the Tetra Tech, Inc. (Tetra Tech) Superfund Technical Assessment and Response Team (START) to provide support during a time-critical removal action at the Dempster Industries site (the site) in Beatrice, Nebraska. This work was authorized under START Contract No. 68HE0719D0001, Task Order No. 68HE0721F0136.

In February 2021, the Nebraska Department of Environment and Energy (NDEE) referred the site to EPA because a number of transformers suspected to contain polychlorinated biphenyls (PCBs) had been vandalized at the abandoned Former Dempster Industries facility. The transformers were found to be leaking on the concrete flooring of the building near a floor drain suspected to drain to an unnamed drainage ditch and ultimately the Big Blue River. The City of Beatrice provided historical analytical results from 1985 that indicated PCB concentrations ranging from 54 to 484,100 parts per million (ppm) in transformers at the facility. In April 2021, NDEE conducted limited soil sampling at the facility drainageway, approximately 800 feet upgradient of the Big Blue River, and limited wipe sampling inside the building with the leaking transformers. One of three soil samples collected from the drainageway contained PCBs, with an Aroclor 1260 concentration of 281 micrograms per kilogram ($\mu\text{g}/\text{kg}$), and wipe samples collected inside the building contained Aroclor 1260 concentrations ranging from 0.43 to 192,000 total micrograms (μg) (Olsson, Inc. [Olsson] 2021).

The purpose of the time-critical removal action was to mitigate imminent and substantial threats to public health, welfare, and the environment posed by hazardous materials at the site. PCBs are “hazardous substances” as defined by section 101(23) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA); 42 *United States Code* (U.S.C.) § 9601(23); and section 302.4 of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 *Code of Federal Regulations* (CFR) § 302.4. START was tasked to conduct verification sampling of PCB-containing transformers as needed, soil and sediment sampling as needed, and removal oversight and field documentation.

This Trip Report documents the site inspection and removal activities from September 30 to November 23, 2021. Section 2.0 discusses the site background, Section 3.0 describes site activities, Section 4.0 presents conclusions, and Section 5.0 lists sources of information cited in the document. Figures are in Appendix A, a photographic documentation log is in Appendix B, and START logbook notes are in Appendix C. Waste disposal manifests are in Attachment 1.

2.0 SITE BACKGROUND

This section specifies the site's location, describes it, and recounts relevant historical investigations of the site.

2.1 LOCATION AND DESCRIPTION

The site is at 711 S. 6th Street in Beatrice, Gage County, Nebraska, and lies in the northeastern part of Section 4, Township 3 North, Range 6 East, of the Beatrice West, Nebraska, topographic quadrangle (Appendix A, Figure 1). The approximately 9-acre site consists of three parcels: 014665000, 014509000, and 014666100. Geographic coordinates at the approximate center of the site are latitude 40.259899 degrees north and longitude 96.748104 degrees west. The site is approximately 1,250 feet above mean sea level.

The site is in a mixed commercial, residential, and industrial area. Fourteen buildings are on the site, with varied number of floors and varied structural integrities (Appendix A, Figure 2). The site is bordered north by a public walking trail with commercial and industrial properties beyond; east by S. 6th Street with mixed commercial, residential, and industrial properties beyond; south by a fueling station with the Beatrice Big Blue Pet Park and Big Blue River beyond; and west by residential properties with mixed industrial and undeveloped land beyond. The site drainage outfall, as well as two municipal stormwater outfalls, are immediately south of the site at the head of an unnamed drainage ditch. The outfalls are approximately 1,000 feet upstream of the confluence of the unnamed drainage ditch with the Big Blue River (Appendix A, Figure 2). The site perimeter is demarcated by chain-link fencing or building walls; however, multiple holes have been cut in the fencing, and windows of buildings have been broken, rendering the site not entirely secured.

2.2 SITE HISTORY

In the late 1800s, the facility began making equipment for farmers and homesteaders, including windmills, water pumps, cultivators, fertilizer spreaders, gasoline products, and recycling trailers. The facility conducted metal manufacturing for another 100 years. In the early 2010s, the company went out of business. All property parcels associated with 711 S. 6th St. were put into tax foreclosure on August 31, 2017, and no one has purchased the property to date, so Dempster Industries LLC, an Ohio company that was dissolved in December 2013, remains the owner of record.

2.3 PREVIOUS INVESTIGATIONS

In September 2017, Olsson performed a Phase I Environmental Site Assessment (ESA) of the site (Olsson 2017). The Phase I ESA identified multiple recognized environmental conditions (RECs) including, but not limited to, indication of a release (staining) from a hydraulic test bench, indication of a release (liquid with sheen) below three of four aboveground storage tanks (ASTs), indications or threat of a release from drums stored in a hazardous material storage area and oil storage area, threat of release from two drums in poor condition labeled as semi-synthetic coolant, observed release from a 5-gallon bucket and two steel drums, indication of a release (staining) to floor drains that discharge to the site outfall, indication of a release (soil staining) below a former equipment location, staining on slab in former forge shop, and indication of a release (observed material) in two containment pits.

In October and November 2017, Olsson conducted a Phase II ESA of the site (Olsson 2018a). The Phase II ESA included soil, groundwater, and sediment sampling to assess presence of contamination at the site. Groundwater analytical results indicated concentrations of arsenic, lead, dibenzofuran, and naphthalene that exceeded direct-contact remediation goals (RGs) and/or EPA maximum contaminant levels (MCLs). Additionally, naphthalene concentrations exceeded NDEE Voluntary Cleanup Program (VCP) risk-based RGs for residential vapor intrusion, and naphthalene, benzene, and ethylbenzene levels exceeded EPA vapor intrusion screening levels (VISLs) for residential and/or commercial vapor intrusion. Soil analytical results indicated concentrations of arsenic, benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, dibenz(a,h)anthracene, and ideno(1,2,3-cd)pyrene that exceeded the respective residential RGs or EPA Regional Screening Levels (RSLs) at multiple locations. Arsenic concentrations exceeded the industrial RG or RSL, and were above background concentrations at all but one sample location. Benzo(a)pyrene and dibenz(a,h)anthracene concentrations exceeded their industrial RGs or EPA RSLs at one location. Concentrations of diesel fuel and waste oil exceeded surface soil risk-based screening levels (RBSLs) at one location. Sediment samples collected near the bank of the Big Blue River, downstream of the unnamed tributary confluence, yielded arsenic concentrations below background concentrations, and total petroleum hydrocarbons (TPH) as diesel and as gasoline, and waste oil below RBSLs.

Following the 2017 Phase II ESA, Olsson performed a supplemental Phase II ESA of the site (Olsson 2018b) that included groundwater, soil, and soil gas sampling. Groundwater results indicated concentrations of bis(2-ethylhexyl)phthalate, acenaphthene, anthracene, benzo(a)anthracene, chrysene, fluoranthene, fluorene, naphthalene, pyrene, and 1,2,4-trimethylbenzene exceeding direct-contact RGs. Additionally, naphthalene, benzene, and ethylbenzene levels exceeded the EPA VISL for vapor intrusion.

Soil analytical results indicated concentrations of arsenic, lead, benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, dibenz(a,h)anthracene, and indeno(1,2,3-cd)pyrene exceeding residential RGs or RSLs at multiple sample locations. Soil gas analytical results indicated concentrations of benzene, n-heptane, n-hexane, and naphthalene exceeding VISLs at multiple locations.

In April 2020, Olsson conducted a Phase I ESA of the site (Olsson 2020) that identified multiple RECs including, but not limited to: long-term property use as an industrial facility, listings in multiple regulatory databases, contaminated soil and groundwater as identified in previous Olsson Phase II ESAs, and indications in NDEE files that Dempster Industries had disposed of molding sands, paint sludges, spent solvents, demolition debris, and plating wastes on the Southwest Property from approximately 1960 to 1981.

In March 2021, Olsson conducted a Phase I ESA of the site (Olsson 2021a) that identified a release of oil from transformers known to contain PCB oil. Oil from the spill had leaked through the floor and into the basement where storm sewer inlets were present. Fifteen transformers and one capacitor were identified; the number of transformers associated with the release was not established. The Phase I ESA also identified additional RECs that had been identified during previous Phase I ESAs performed by Olsson.

In April 2021, Olsson conducted a Phase II ESA of the site (Olsson 2021b) that included soil, groundwater, soil gas, and wipe sampling to assess presence of contamination at the site. Soil analytical results yielded concentrations of benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, indeno(1,2,3-cd), pyrene, and naphthalene that exceeded residential NDEE VCP RGs at one location; and concentrations of PCBs (Aroclor 1260) that exceeded the residential NDEE VCP RG at three locations and the industrial NDEE VCP RG at two locations. No groundwater exceedances were noted. Soil gas concentrations of 1,3-butadiene exceeded the residential NDEE VCP RG at each of the three soil gas sample locations. Wipe sample results indicated presence of the PCB Aroclor 1260 at all six sampling locations, with concentrations ranging from 0.43 to 192,000 total micrograms per wipe.

3.0 SITE ACTIVITIES

This section discusses site activities including site visits, removal action, and waste disposal.

A photographic documentation log is in Appendix B, and START logbook field notes are in Appendix C.

3.1 SITE VISITS

On September 30, EPA On-Scene Coordinator (OSC) Davis conducted a site visit with representatives of the City of Beatrice, NDEE, and Olsson. Representatives from EPA's START, and Emergency and Rapid Response Services (ERRS) contractors attended the site visit to support EPA. Two areas within the site were identified to host transformers, capacitors, and containers of oil suspected to contain PCBs (Appendix A, Figure 3). Indications that the materials possibly contained PCBs included presence of PCB warning labels, wipe sample analytical results from the Olsson April 2021 Phase II ESA, and analytical results from 1985 provided by the City of Beatrice indicating presence of PCB concentrations ranging from 54 to 484,100 ppm in transformers at the facility.

Within Removal Area 1 were the following:

- One 72-gallon (medium) transformer one-eighth full of PCB oil
- Two medium transformers with residual PCB oil
- One estimated 50-gallon transformer (small) one-third full of PCB oil
- One small transformer one-quarter full of PCB oil
- Three small transformers with residual PCB oil
- One 55-gallon poly drum one-third full of suspected PCB oil
- One 55-gallon poly drum one-quarter full of suspected PCB oil
- One cabinet containing 21 PCB-containing capacitors
- One cabinet holding six PCB-containing capacitors
- One rack holding 11 PCB-containing capacitors.

Within Removal Area 2 were the following:

- A PCB oil spill reported by NDEE
- Two 83-gallon (large) transformers full of PCB oil
- One medium transformer one-quarter full of PCB oil
- Two small transformers full of PCB oil
- One small transformer one-half full of PCB oil

- One small transformer one-quarter full of PCB oil
- One small transformer with residual PCB oil
- One rack holding 5 PCB-containing capacitors.

In the basement below Removal Area 2 were two areas of oil staining. Oil had migrated into one area through the ceiling and down the wall; oil had dripped into the second area out of a pipe directly above a floor drain. The floor drain was full of water at the time of the site walk, indicating lack of drainage.

The site walk included inspections of the site outfall and headwaters of the unnamed drainage ditch that flows into the Big Blue River. No indication of a recent oil release was evident at the site outfall or the nearby municipal outfalls. Scrap metal was observed at the right descending bank of the unnamed drainage ditch near the site outfall, and was eroding into the ditch. A dead racoon was observed in the site outfall, and a second dead racoon was observed approximately 100 feet downstream of the municipal outfalls.

Participants in the site walk observed evidence of previous entry to the site by trespassers—a breach in the fence along the southern property boundary, and broken windows along the northeastern property boundary. These indicated that the site was not secured. Other evidence of trespassers, including spray paint graffiti and indications of salvaging valuable metals, was apparent throughout the site.

Additional chemicals of concern, as documented by the Olsson Phase II ESA reports, were observed throughout the site. Preliminary inspections by START and EPA identified various containers labeled as accumulated waste, corrosives, and flammables, in addition to unlabeled containers of suspected waste or chemicals. Two 10,000-gallon ASTs, each approximately one-quarter full, were observed in a room with a pit containing approximately 1 foot of liquid with an oil sheen. An additional identified AST could not be inspected due to limited access.

On October 12, EPA OSC Davis, EPA OSC Mammoliti, START, and ERRS visited the site to generate additional documentation for potential PCB disposal vendors. An Emerald Transformer representative joined the site visit to provide disposal details and a quote. Before entry of these individuals to the site for this visit, the City of Beatrice had notified EPA that the City of Beatrice representative had found trespassers on site upon arrival to unlock the site. After Beatrice police cleared the site, EPA, START, and ERRS entered it. Found in Removal Area 1 were a tool box, a rack of opened PCB-containing capacitors, and two 5-gallon containers one-half full of suspected PCB oil—indicating that the trespassers had opened capacitors and transferred oil in a suspected search for valuable metals.

START conducted air monitoring during both site visits using a RAE Systems MultiRAE Pro (MultiRAE Pro) with sensors equipped to monitor airborne concentrations of volatile organic compounds (VOCs), carbon monoxide (CO), hydrogen sulfide (H₂S), percent of oxygen (O₂), and lower explosive limit (LEL). START air monitoring indicated no elevated or abnormal readings during either site visit. During the September 30 site visit, ERRS additionally conducted air monitoring with a five-gas meter that indicated no elevated or abnormal readings. During the October 12 site visit, EPA additionally performed air monitoring using an Ohio Lumex RA-915M Portable Mercury Analyzer to monitor airborne concentrations of mercury, and no elevated readings resulted.

3.2 LIMITED REMOVAL ACTION

On November 1, 2021, EPA OSCs Davis and Hoffman, START, and ERRS mobilized to Beatrice, Nebraska to initiate removal of the PCB-related materials.

On November 2, 2021, EPA, START, and ERRS entered the site after Beatrice police had cleared it. ERRS completed the following tasks: established equipment staging areas; established and demarcated work areas and egress routes for Removal Area 1 and Removal Area 2; established lighting for Removal Area 1; cleared debris, vegetation, and other obstructions to allow safe and efficient access to both Removal Areas for personnel and machinery; received a rented skid steer; and a rented CONEX box.

On November 3, 2021, ERRS initiated removal of PCB-associated materials from Removal Area 1. PCB oil was transferred from transformers, poly drums, and 5-gallon containers into steel 55-gallon drums. Following removal of PCB oil from transformers, drums, and 5-gallon containers, the empty transformers and containers were removed and staged for disposal. PCB-containing capacitors were removed from the two cabinets and staged before transfer into drums for disposal. PCB-containing capacitors in racks were opened, and the PCB oils were drained into drums and staged for disposal. Containment measures during all oil transferring activities included use of poly sheeting and absorbent pads.

On November 4, 2021, ERRS continued removal of PCB-associated materials from Removal Area 1. ERRS removed the casings of the rack PCB-containing capacitors, as the casings and associated equipment contained residual PCB oil. Capacitor casings were bulked in lined cubic-yard boxes and staged for disposal. ERRS completed removal of PCB materials from Removal Area 1 by 09:15, and began transferring work supplies and equipment to Removal Area 2. Work in Removal Area 2 included use of Oil-Dri to absorb oil that had spilled on the floor, transfer of PCB oil from rack capacitors to drums, removal of rack PCB capacitor casings and transfer of these to cubic-yard boxes, and initiation of transfer of PCB oil from transformers to drums. Transformer casings were removed and staged following

transfer of oil to drums. On November 4, OSC Hoffman demobilized at mid-day, and START demobilized following completion of the workday.

On November 5, 2021, ERRS completed transfer of PCB oil from transformers to drums in Removal Area 2. Following this, the remaining empty transformers were removed and staged for disposal, and the floors were cleaned. ERRS then began transporting staged waste materials to the ERRS CONEX box where the waste could be secured until selection of a disposal vendor.

On November 6, 2021, ERRS completed transportation and securing of waste materials at the site CONEX box. EPA and ERRS conducted a final site walk to inspect both removal areas, and then demobilized.

START had conducted air monitoring from November 1 through 4, 2021, using a MultiRAE Pro with sensors equipped to monitor airborne concentrations of VOCs, CO, H₂S, percent O₂, and LEL. START monitored air in the work area approximately every hour during removal activities, or more frequently during initiation of a new removal task. START air monitoring resulted in no elevated or abnormal readings during removal activities.

3.3 WASTE DISPOSAL

On November 23, 2021, disposal vendor Chemical Waste Management, Inc. (Waste Management) arrived at the site to transport the waste materials to the Waste Management disposal facility in Emelle, Alabama. Waste Management is an approved facility under EPA's Off-Site Rule as established in Title 40 CFR, Section 300.440(a)(4). Total amounts of waste removed and transported for disposal are listed in Table 1 below. Waste manifests are in Attachment 1.

TABLE 1
WASTE DISPOSAL SUMMARY
DEMPSTER INDUSTRIES SITE, BETRICE, NEBRASKA

Waste Stream	Amount	Description	Facility	Transportation Date
TSCA Solids	7,900 lbs	3 CY – Miscellaneous PCB Debris 3 CY – PCB Capacitor Casing 12 PCB Transformer Casing (100 lbs) 3 PCB Transformer Casing (300 lbs) 2 PCB Transformer Casing (400 lbs)	WM – Emelle, Alabama	November 23, 2021
TSCA Oil	3,000 lbs	8 Drums – PCB Oil		
TSCA Mixed	300 lbs	3 Drums – Capacitors with PCB Oil		

Notes:

CY Cubic yards
lbs Pounds
PCB Polychlorinated biphenyl
TSCA Toxic Substances Control Act
WM Waste Management

4.0 CONCLUSION

The time-critical removal action conducted at the site successfully mitigated the immediate threats to public health, welfare, and the environment posed by presence of PCB-containing electrical equipment at the site that had been vandalized and was found to be leaking on the concrete flooring of an on-site building near a floor drain.

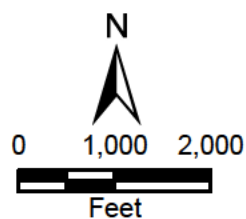
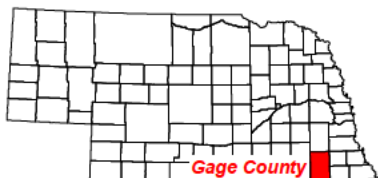
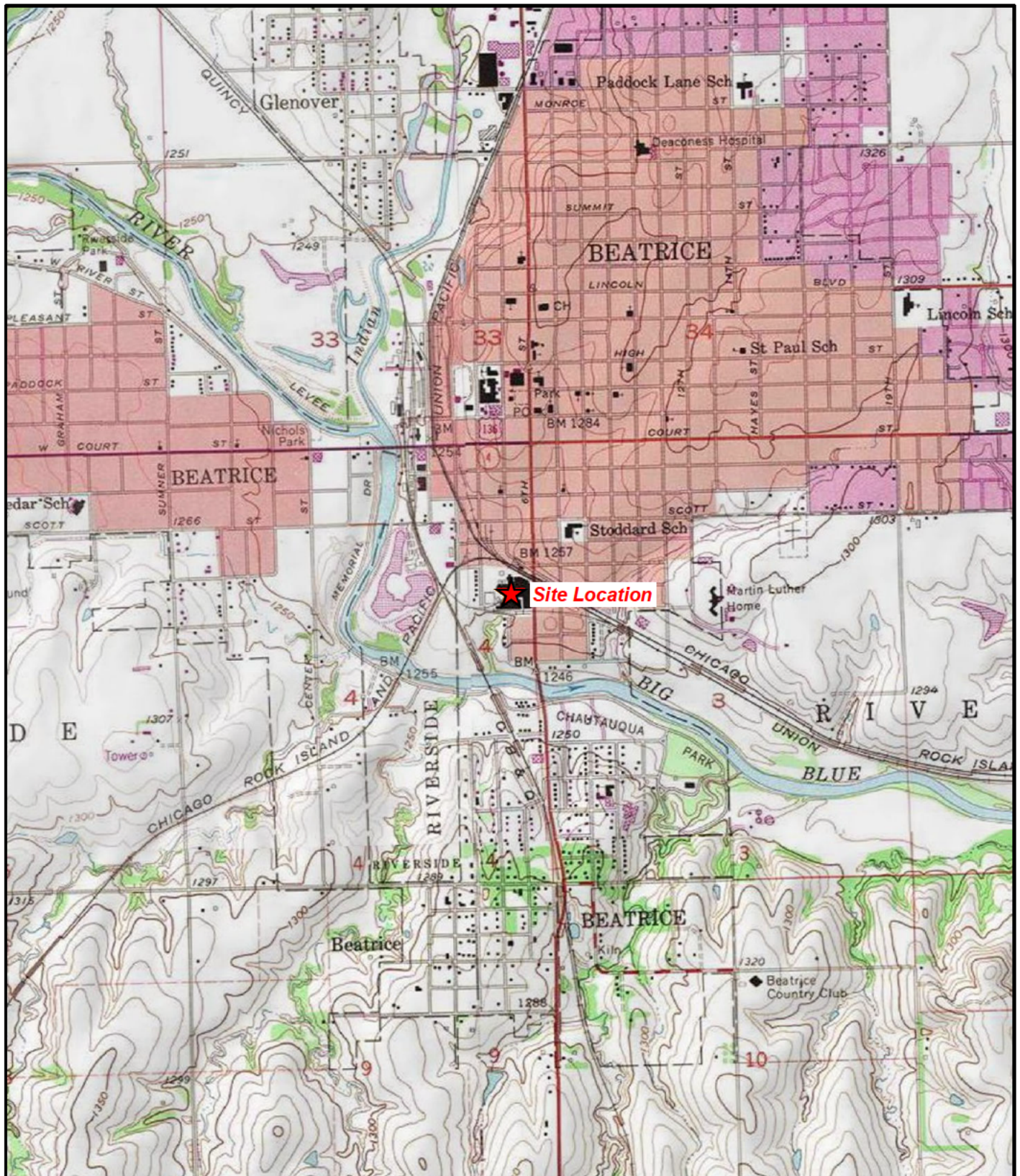
EPA intends to conduct an additional removal action to characterize and dispose of other chemicals identified during the initial site visits. Additional assessments will be required to determine if response actions may be necessary to mitigate other possibly present hazards at the site including vapor intrusion into buildings and direct exposure to contaminated soil and sediments identified during previous investigations.

5.0 REFERENCES

- Olsson, Inc. (Olsson). 2017. Dempster Industries 711 South 6th Street Beatrice, Nebraska, Section 128(a) Phase I ESA Report, Revision No. 01. September.
- Olsson. 2018a. Dempster Industries 711 South 6th Street Beatrice, Nebraska, Section 128(a) Phase II ESA Report, Revision No. 01. January.
- Olsson. 2018b. Dempster Industries 711 S 6th Street Beatrice, Nebraska, Supplement Section 128(a) Phase II ESA Report, Revision No. 01. June.
- Olsson. 2020. Dempster Industries 711 South 6th Street Beatrice, Nebraska, Section 128(a) Phase I ESA Report, Revision No. 01. April.
- Olsson. 2021a. Dempster Industries 711 South 6th Street Beatrice, Nebraska, Section 128(a) Phase I ESA Report, Revision No. 01. March.
- Olsson. 2021b. Dempster Industries 711 S 6th Street Beatrice, Nebraska, Section 128(a) Phase II ESA Report, Revision No. 00. June.

APPENDIX A

FIGURES



Dempster Industries
711 S 6th Street
Beatrice, Nebraska

Figure 1
Site Location Map



Source: Beatrice East, Nebraska USGS 7.5 Minute Topo Quad, 1980;
Beatrice West, Nebraska USGS 7.5 Minute Topo Quad, 1980;
Blue Springs, Nebraska USGS 7.5 Minute Topo Quad, 1964;
Odell NE, Nebraska USGS 7.5 Minute Topo Quad, 1972

Date 10/6/2021

Drawn By Nick Wiederholt

Project No. X903019F0076.006



Legend

- Municipal outfall location
- Building with identification number
- Site outfall location
- Unnamed drainage ditch
- Approximate site boundary

0 65 130
Feet

Dempster Industries
711 S 6th Street
Beatrice, Nebraska

Figure 2
Site Layout Map

TETRA TECH

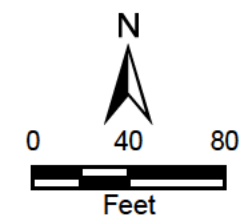
Date: 11/11/2021 Drawn By: Nick Wiederholt Project No: X903021F0136

X:\903021\F0136\03021F0136.mxd 11/11/2021

Source: Esri, ArcGIS Online, World Imagery (Clarity); Olsson, Dempster Industries, Figure 3 - Building Identification and REC Location Map, 2021



- Legend
- Approximate removal area
 - Approximate site boundary
 - Building with identification number



Dempster Industries
711 S 6th Street
Beatrice, Nebraska

Figure 3
Limited Removal Areas



APPENDIX B
PHOTO DOCUMENTATION LOG

**Dempster Industries Site
Beatrice, Nebraska**



TETRA TECH PROJECT NO. X903021F0136.000 Direction: Southwest	PHOTO DESCRIPTION	This photograph shows the east side of the Dempster Industries Site, bordering S. 6 th Street.	1
	CLIENT	U.S. Environmental Protection Agency (EPA) Region 7	Date
	PHOTOGRAPHER	B. Martin (START)	9/30/21



TETRA TECH PROJECT NO. X903021F0136.000 Direction: Southwest	PHOTO DESCRIPTION	This photograph shows the contents of Removal Area 1 including two cabinets housing polychlorinated biphenyls (PCB)-containing capacitors, one small transformer one-third full of PCB oil, and two small transformers with residual PCB oil.	2
	CLIENT	EPA Region 7	Date
	PHOTOGRAPHER	B. Martin (START)	9/30/21

**Dempster Industries Site
Beatrice, Nebraska**

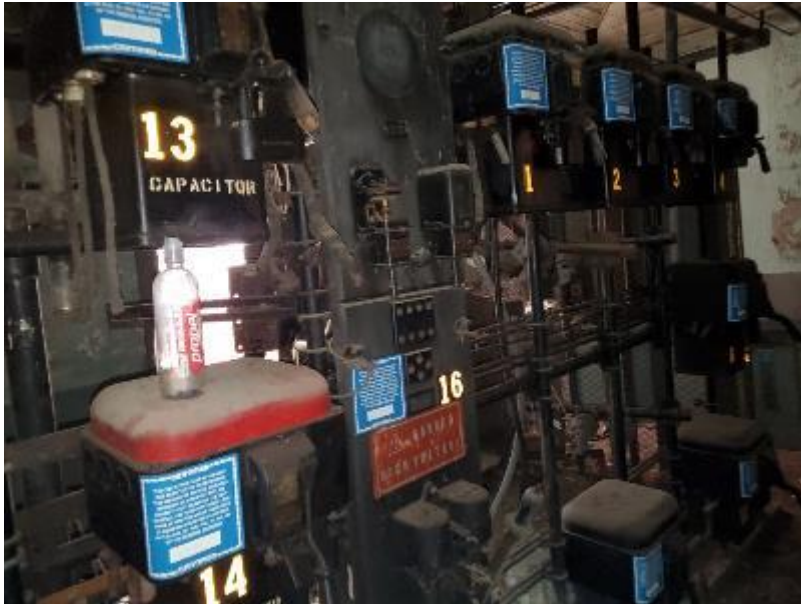


TETRA TECH PROJECT NO. X903021F0136.000 Direction: Southwest	PHOTO DESCRIPTION	This photograph shows the contents of Removal Area 1 including one small transformer with residual PCB oil, and one poly drum one-third full of suspected PCB oil.	3
	CLIENT	U.S. Environmental Protection Agency (EPA) Region 7	Date
	PHOTOGRAPHER	B. Martin (START)	9/30/21



TETRA TECH PROJECT NO. X903021F0136.000 Direction: North	PHOTO DESCRIPTION	This photograph shows the contents of Removal Area 1 including two medium transformers with residual PCB oil, one medium transformer one-eighth full of PCB oil, one small transformer one-fourth full of PCB oil, and one poly drum one-fourth full of suspected PCB oil.	4
	CLIENT	EPA Region 7	Date
	PHOTOGRAPHER	B. Martin (START)	9/30/21

**Dempster Industries Site
Beatrice, Nebraska**



TETRA TECH PROJECT NO. X903021F0136.000 Direction: Northeast	PHOTO DESCRIPTION	This photograph shows the contents of Removal Area 1 including 11 capacitors with PCB oil.	5
	CLIENT	U.S. Environmental Protection Agency (EPA) Region 7	Date
	PHOTOGRAPHER	B. Martin (START)	9/30/21



TETRA TECH PROJECT NO. X903021F0136.000 Direction: Southeast	PHOTO DESCRIPTION	This photograph shows the contents of Removal Area 2 including one small transformer with residual PCB oil and suspected PCB oil spill.	6
	CLIENT	EPA Region 7	Date
	PHOTOGRAPHER	B. Martin (START)	9/30/21

**Dempster Industries Site
Beatrice, Nebraska**



TETRA TECH PROJECT NO. X903021F0136.000 Direction: Northeast	PHOTO DESCRIPTION	This photograph shows the contents of Removal Area 2 including one medium transformer one-fourth full of PCB oil, two small transformers full of PCB oil, and two small transformers one-half and one-quarter full of PCB oil, respectively.	7
	CLIENT	EPA Region 7	Date
	PHOTOGRAPHER	B. Martin (START)	9/30/21



TETRA TECH PROJECT NO. X903021F0136.000 Direction: East	PHOTO DESCRIPTION	This photograph shows the contents of Removal Area 2 including two large transformers full of PCB oil and five PCB-containing capacitors.	8
	CLIENT	EPA Region 7	Date
	PHOTOGRAPHER	B. Martin (START)	9/30/21

**Dempster Industries Site
Beatrice, Nebraska**



TETRA TECH PROJECT NO. X903021F0136.000 Direction: NA	PHOTO DESCRIPTION	This photograph shows the basement below Removal Area 2 where oil stains indicated entry of oil into the floor drain.	9
	CLIENT	EPA Region 7	Date
	PHOTOGRAPHER	B. Martin (START)	9/30/21



TETRA TECH PROJECT NO. X903021F0136.000 Direction: NA	PHOTO DESCRIPTION	This photograph shows the basement below Removal Area 2 where oil stains indicated migration of oil through the ceiling and onto the walls.	10
	CLIENT	EPA Region 7	Date
	PHOTOGRAPHER	B. Martin (START)	9/30/21

**Dempster Industries Site
Beatrice, Nebraska**



TETRA TECH PROJECT NO. X903021F0136.000 Direction: Northwest	PHOTO DESCRIPTION	This photograph shows the site outfall directly south of the site property boundary. A dead racoon was observed in the outfall opening.	11
	CLIENT	EPA Region 7	Date
	PHOTOGRAPHER	B. Martin	9/30/21



TETRA TECH PROJECT NO. X903021F0136.000 Direction: North	PHOTO DESCRIPTION	This photograph shows two municipal outfalls immediately downgradient of the site outfall.	12
	CLIENT	EPA Region 7	Date
	PHOTOGRAPHER	B. Martin	9/30/21

**Dempster Industries Site
Beatrice, Nebraska**



TETRA TECH PROJECT NO. X903021F0136.000 Direction: South	PHOTO DESCRIPTION	This photograph shows a breach in the southern site property fence indicating that the site is not secured.	13
	CLIENT	EPA Region 7	Date
	PHOTOGRAPHER	B. Martin (START)	9/30/21



TETRA TECH PROJECT NO. X903021F0136.000 Direction: Southwest	PHOTO DESCRIPTION	This photograph shows broken windows at a northeastern site building indicating that the site is not secured.	14
	CLIENT	EPA Region 7	Date
	PHOTOGRAPHER	B. Martin (START)	9/30/21

**Dempster Industries Site
Beatrice, Nebraska**



TETRA TECH PROJECT NO. X903021F0136.000 Direction: North	PHOTO DESCRIPTION	This photograph shows a toolbox found in Removal Area 1 following identification of trespassers on site.	15
	CLIENT	EPA Region 7	Date
	PHOTOGRAPHER	B. Martin (START)	10/12/21



TETRA TECH PROJECT NO. X903021F0136.000 Direction: Northeast	PHOTO DESCRIPTION	This photograph shows an opened PCB-containing capacitor in Removal Area 1 following identification of trespassers on site.	16
	CLIENT	EPA Region 7	Date
	PHOTOGRAPHER	B. Martin	10/12/21

**Dempster Industries Site
Beatrice, Nebraska**



<p>TETRA TECH PROJECT NO. X903021F0136.000</p> <p>Direction: Southeast</p>	PHOTO DESCRIPTION	This photograph shows the Emergency and Rapid Removal Services (ERRS) CONEX box delivered to the site for equipment and waste storage.	17
	CLIENT	EPA Region 7	Date
	PHOTOGRAPHER	B. Martin	11/2/21



<p>TETRA TECH PROJECT NO. X903021F0136.000</p> <p>Direction: NA</p>	PHOTO DESCRIPTION	This photograph shows a hole in the floor in Removal Area 2 suspected to allow migration of spilled PCB oil to the basement where the floor drain is located.	18
	CLIENT	EPA Region 7	Date
	PHOTOGRAPHER	B. Martin	11/2/21

**Dempster Industries Site
Beatrice, Nebraska**



TETRA TECH PROJECT NO. X903021F0136.000 Direction: NA	PHOTO DESCRIPTION	This photograph shows ERRS transferring PCB oil from a transformer to a drum for disposal, in Removal Area 1.	19
	CLIENT	EPA Region 7	Date
	PHOTOGRAPHER	B. Martin (START)	11/3/21



TETRA TECH PROJECT NO. X903021F0136.000 Direction: NA	PHOTO DESCRIPTION	This photograph shows ERRS removing PCB oil compartments from rack capacitors for subsequent transfer to a drum for disposal, in Removal Area 1.	20
	CLIENT	EPA Region 7	Date
	PHOTOGRAPHER	B. Martin (START)	11/3/21

**Dempster Industries Site
Beatrice, Nebraska**



<p>TETRA TECH PROJECT NO. X903021F0136.000</p> <p>Direction: NA</p>	PHOTO DESCRIPTION	This photograph shows PCB-containing capacitor casings from Removal Area 1 bulked in a lined cubic-yard box for disposal.	21
	CLIENT	EPA Region 7	Date
	PHOTOGRAPHER	B. Martin (START)	11/4/21



<p>TETRA TECH PROJECT NO. X903021F0136.000</p> <p>Direction: NA</p>	PHOTO DESCRIPTION	This photograph shows the temporary waste staging area for materials removed from Removal Area 1. Capacitors in foreground were subsequently drummed for removal.	22
	CLIENT	EPA Region 7	Date
	PHOTOGRAPHER	B. Martin (START)	11/4/21

**Dempster Industries Site
Beatrice, Nebraska**



TETRA TECH PROJECT NO. X903021F0136.000 Direction: North	PHOTO DESCRIPTION	This photograph shows Removal Area 1 following completion of removal of PCB-containing materials.	23
	CLIENT	EPA Region 7	Date
	PHOTOGRAPHER	B. Martin (START)	11/4/21



TETRA TECH PROJECT NO. X903021F0136.000 Direction: Northeast	PHOTO DESCRIPTION	This photograph shows Removal Area 1 following completion of removal of PCB-containing materials.	24
	CLIENT	EPA Region 7	Date
	PHOTOGRAPHER	B. Martin (START)	11/4/21

**Dempster Industries Site
Beatrice, Nebraska**



TETRA TECH PROJECT NO. X903021F0136.000 Direction: East	PHOTO DESCRIPTION	This photograph shows ERRS transferring PCB oil from a transformer to a drum for disposal, in Removal Area 2.	25
	CLIENT	EPA Region 7	Date
	PHOTOGRAPHER	B. Martin (START)	11/4/21

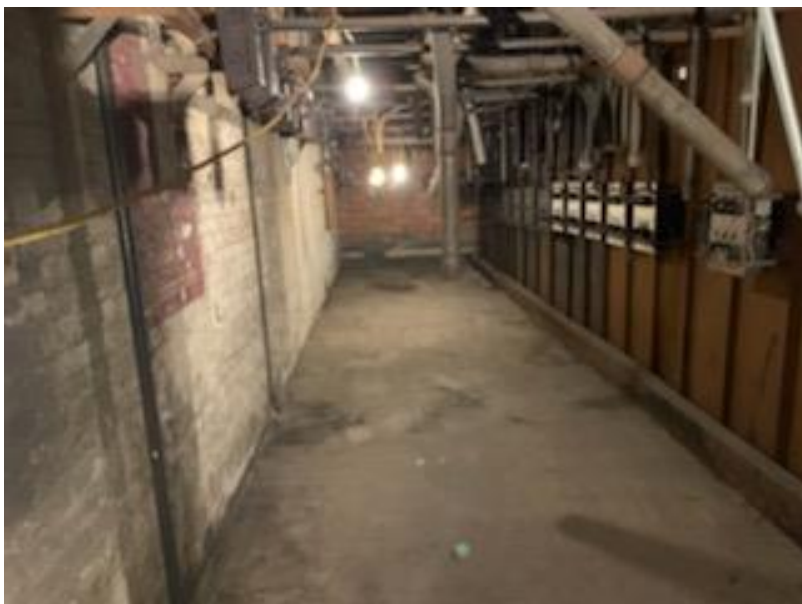


TETRA TECH PROJECT NO. X903021F0136.000 Direction: Southeast	PHOTO DESCRIPTION	This photograph shows ERRS transferring PCB oil from a capacitor compartment to a drum for disposal, in Removal Area 2.	26
	CLIENT	EPA Region 7	Date
	PHOTOGRAPHER	B. Martin (START)	11/4/21

**Dempster Industries Site
Beatrice, Nebraska**



TETRA TECH PROJECT NO. X903021F0136.000 Direction: Northwest	PHOTO DESCRIPTION	This photograph shows ERRS removing a transformer from Removal Area 2 following removal of PCB oil.	27
	CLIENT	EPA Region 7	Date
	PHOTOGRAPHER	M. Davis (EPA)	11/5/21



TETRA TECH PROJECT NO. X903021F0136.000 Direction: East	PHOTO DESCRIPTION	This photograph shows Removal Area 2 following completion of removal of PCB-containing materials.	28
	CLIENT	EPA Region 7	Date
	PHOTOGRAPHER	M. Davis (EPA)	11/5/21

**Dempster Industries Site
Beatrice, Nebraska**



TETRA TECH PROJECT NO. X903021F0136.000 Direction: East	PHOTO DESCRIPTION	This photograph shows the drummed PCB oil and empty transformers staged for disposal.	29
	CLIENT	EPA Region 7	Date
	PHOTOGRAPHER	M. Davis (EPA)	11/5/21



TETRA TECH PROJECT NO. X903021F0136.000 Direction: East	PHOTO DESCRIPTION	This photograph shows the cubic-yard boxes holding PCB-containing solids and empty transformers, staged for disposal.	30
	CLIENT	EPA Region 7	Date
	PHOTOGRAPHER	M. Davis (EPA)	11/5/21

APPENDIX C
LOGBOOK NOTES

2 DEMPSTER INDUSTRIES 9/30/2021

- 1000 START B. Martin arrived onsite for site walk. USEPA, NEE, EPRS, City of Beatrice onsite. ———
- 1010 Group began site walk ———
- 1230 Group ended site walk. Facility not secured, broken windows and holes in fence allow access to property. Approximately 10 PCB capacitors located, some contain oil, some oil is in secondary containers, some oil is on floor. PCB capacitors identified. Asbestos pipe wrap identified. Various ~~cor~~ containers with corrosive and flammable placards identified, various containers w/ no labels. Approx. 15 gas cylinders identified. Various large tanks w/ unknown contents identified, 2 in oil pit w/ unknown depth/area. 3 dead raccoons found. Inspected site outfall, metal present in banks and discolored sediment/water observed. START photographed notable items. ———
- 1240 Group offsite. Note: START had a MultiRAE Pro during the site walk, no elevated/abnormal readings observed, VOL, O₂, CO, H₂S, LEV. ———

Broken window 9/30/21

DEMPSTER INDUSTRIES 10/12/2021 3

- 1030 START B. Martin arrived onsite. USEPA OSCs Davis & Mammoliti, EPRS Gibson, ~~City~~ Beatrice police. Police clearing site of trespassers identified when city opened site.
- 1050 Group notified by police that the site was clear, group entered site. ———
- 1100 Doug Pierce of Emerald Transformers arrived and group conducted site walk w/ MultiRAE Pro + Lumex. ———
- 1430 Site walk completed. North transformer area had been tampered w/, suspected to be trespassers scavenging, two capacitors opened, transformer casings moved, New toolbox present. Group able to access South transformer area, 5 small transformers + 2 large transformers + 5 capacitors all suspected to be full or partially full w/ oil. Additional fuse boxes may have PCB oil. Dead owl + racoon identified inside building. No elevated readings on MultiRAE or Lumex ———
- 1445 Group offsite. Pierce offsite at approx 1300 ——— *PM 10/12/21*

11/2/2021

- 0700 EPA, EPRS, START, City of Beatrice, Beatrice Police onsite. EPA, EPRS, START conducted HS meeting. City/police cleared building.
- 0730 START bump tested MultiRAE 1301746, all sensors passed. City/police offsite.
- 0745 EPA, EPRS, START conducted site walk, VOC: 0-1.1 ppm, CO: 0, O₂: 20.9%, H₂S: 0 LEL: 0.
- 0800 EPRS establishing work areas + egress routes. Clearing debris + vegetation to access north transformer area + south transformer area.
- 0940 Skid steer arrived onsite
- 1120 Coner box arrived onsite
- 1200 Lunch break, START + EPRS offsite
- 1300 Work resumed. EPRS continued clearing + prepping work area.
- 1720 EPA, EPRS, START offsite

Becker
11/2/2021

11/3/21

- 0745 START arrived onsite. EPA + EPRS on site. H/S Meeting. Weather: 35-47°F, overcast, wind SSW 5-10 mph.
- 0800 START bump tested MultiRAE Pro, all sensors passed. EPRS prepping work area.
- 0900 North Room A
 1 55 gal, 1/4 full
 1 55 gal casing, 1/8 full
 2 80 gal casing, empty 72"
 1 80 gal casing, 1/8 full
 1 55 gal, 1/3 full
 1 55 gal casing, empty
 6 capacitors, full
 1 55 gal casing, 1/3 full
 1 55 gal casing, empty
 1 55 gal casing, empty
 21 capacitors, full
- North Room B
 11 capacitors, full
 2 5 gal containers, 1/2 full
- note: EPRS removing empty transformer casings. START conducted air monitoring in work area VOC: 0, CO: 0, O₂ 20.9%, H₂S: 0, LEL: 0.
- 0950 EPRS began removing oil from condensers.

11/3/2021

- and transformers into drums for disposal.
- 1130 Free oil drummed + casings/transformers removed from north room. Crews on break.
- 1230 Work resumed. ERHS draining oil from wall capacitors and removing cabinet capacitors. wall capacitor oil bulked, cabinet capacitors will be drummed. MultiRAE pro work zone readings $VOC: 0$, $CO: 0$, $O_2: 20.87$, $H_2S: 0$, $LEL: 0$.
- 1630 ERHS wrapping up site work for day
- 1700 EPA, START, ERHS off-site

Brendan Minto
11/3/21

11/4/2021 7

- 0745 START arrived onsite. EPA + ERHS on site. H/S Meeting. Weather 40-58°F, clear, winds SSW at 10-15 mph. START bump tested MultiRAE Pro, all sensors passed. Plan today: remove capacitor shells from rack in north room, transition to south room.
- 0800 ERHS prepping north room for work.
- 0815 ERHS cutting capacitors from rack in north room: Work zone or non-tox?
 $VOC: 0$, $CO: 0$, $O_2: 20.9$, $LEL: 0$, $H_2S: 0$.
- 0915 ERHS completed north room. Transitioning to south room. South room air monitoring $VOC: 0$, $CO: 0$, $O_2: 20.9$, $LEL: 0$, $H_2S: 0$. South room inventory:
- 72 gal casing, empty
 - 72 gal casing, 1/4 full
 - 55 gal casing, full
 - 72 gal casing, full
 - 72 gal casing, 1/4 full
 - 55 gal casing, 1/2 full
 - 5 wall capacitors, full
- (2) 83 gal casings, unknown.
- 1100 ERHS break for lunch, EPA off-site.
- 1200 ERHS resumed work, began ^{retrofitting} transformers

DEMPSTER INDUSTRIES 11/4/21

oil from transformers to drums in
south room.

1215 Work zone air monitoring: VOC:
50 ppb, CO:0, O₂:20.9%, H₂S:0,
LEL:0.

1335 Oil from open transformers transferred
to drums EPRS opening + draining
capacitors + opening 2 large sealed
transformers.

1520 EPRS began transferring oil from
2 large ^{transformers} capacitors into drums.

1615 EPRS packing up work area

1620 EPA onsite

1700 EPA, EPRS, START OFFSITE

For [signature]
11/4/21

ATTACHMENT 1
WASTE DISPOSAL MANIFESTS

Please print or type.

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number EXEMPT	2. Page 1 of 1	3. Emergency Response Phone (800)424-9300	4. Manifest Tracking Number 006953940 GBF		
5. Generator's Name and Mailing Address DEMETER INDUSTRIES SITE USEPA REGION 7 711 SOUTH 8TH STREET 11201 RENNER BLVD BEATRICE NE 68310 (402)345-2842 (402)281-0991		Generator's Site Address (if different than mailing address) DEMETER INDUSTRIES 711 S 6TH ST BEATRICE, NE 68310					
6. Transporter 1 Company Name W.B. & M. Co.		U.S. EPA ID Number NE06731491					
7. Transporter 2 Company Name		U.S. EPA ID Number					
8. Designated Facility Name and Site Address CHEMICAL WASTE MANAGEMENT, INC. HIGHWAY 17 NORTH, MILE MARKER 163 EMELLE AL 35459 (205)652-9721		U.S. EPA ID Number ALD000622484					
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
			No.	Type			
	X	RQ, UN2315, POLYCHLORINATED BIPHENYLS, LIQUID, 0, II 407730AL	008	DM	3,000	LBS	
	X	RQ, UN3432, POLYCHLORINATED BIPHENYLS, SOLID MIXTURE, 0, III 407732AL	003	CF	3,000	LBS	
	X	RQ, UN3432, POLYCHLORINATED BIPHENYLS, SOLID MIXTURE, 0, III 407732AL	003	DM	300	LBS	
		RQ, UN3432, POLYCHLORINATED BIPHENYLS, SOLID MIXTURE, 0, III 407733AL	002	CF	2,000	LBS	
14. Special Handling Instructions and Additional Information 1. 407730AL 2. 407732AL 3. 407732AL 4. 407733AL ERI PROVIDER: CHEMTREC (CONTRACT CCN 24117)							
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 Region 7 Environmental Protection Agency		Signature <i>[Signature]</i>				Month Day Year 11 23 2020	
TRANSPORTER	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 signature (for exports only):						
DESIGNATED FACILITY	17. Transporter Acknowledgment of Receipt of Materials		Signature				
	Transporter 1 Printed/Typed Name John T. [Signature]		Month Day Year 11 23 2020				
	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							
Manifest Reference Number: _____							
18b. Alternate Facility (or Generator)		U.S. EPA ID Number					
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.		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	

GENERATOR