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June 7, 2000

John Leskoski
Solid Waste Supervisor
Waste Management Program
Department of Environmental Protection
2 Public Square
Wilkes-Barre, PA 18711-0790

Re: 1400 East Lackawanna Avenue (a/k/a Fern Hill)
Olyphant, Lackawanna County, PA

Dear John:

As follow up to our recent conversation, enclosed is the "Remedial Action Report" for the activities conducted at the above site.

To answer your questions concerning the relationship of the parties involved, WEA Manufacturing Company, Inc. was a tenant that occupied a portion of the building located on the property. WEA vacated the property in 1999. The site is owned by Salrich, Inc. McLaren/Hart conducted the investigation and remedial activities on behalf of WEA and its work was overseen by Advanced GeoServices Corp., a consulting firm retained by Salrich.

I understand that staffing considerations are such that it may be some time before the report is reviewed. However, after examining it please contact me if there are any questions. Thank you.

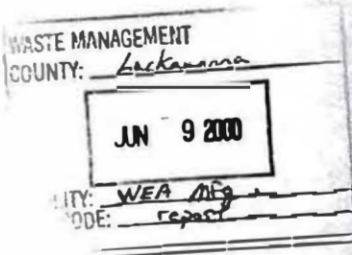
Very truly yours,

KREDER, BROOKS, HAILSTONE & LUDWIG

Stephen W. Saunders

SWS/rc

c: Jeffrey Raider, Director of Legal Affairs, WEA
Bonnie Barnett, Esquire, Counsel for Salrich



Remedial Action Report
Fern Hill Property
Olyphant, Pennsylvania

March 21, 2000

Prepared for:

WEA Manufacturing
1400 East Lackawanna Avenue
Olyphant, Pennsylvania 18448

Prepared by:

McLaren/Hart, Inc.
Blue Bell Executive Campus
470 Norristown Road, Suite 300
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1.0 INTRODUCTION

This report provides a summary of the drum investigation and remediation activities that were conducted at the Fern Hill Facility, in Olyphant, Pennsylvania (Site) between July 20, 1999 and December 3, 1999. A Site Location Map is provided as Figure 1.

1.1 BACKGROUND

On October 29, 1998, a geophysical survey was conducted at the Site, which indicated the presence of a 30-foot long by 15-foot wide anomaly located approximately 72 feet northwest of the onsite warehouse. The geophysical anomaly identified by the geophysical survey corresponded with the reported location of 20 to 25, steel 55-gallon drums, which were reportedly buried at the Site during the mid- to late-1980s.

The following section presents a discussion of the work completed to investigate the geophysical anomaly, and to excavate and dispose of the buried drums and surrounding soils encountered in the anomaly area. All work was completed in accordance with the scope-of-work outlined in McLaren/Hart's May 1999 *Drum Investigation Workplan* (Workplan) and the August 1999 *Erosion and Sediment Control Plan* (E&SC Plan).

2.0 WORK COMPLETED

2.1 EXPLORATORY TRENCHING

On July 20, 1999, prior to the mobilization of a full-scale site excavation crew, McLaren/Hart's remediation contractor, Code Environmental, Inc. (Code) mobilized the necessary personnel and equipment to complete an exploratory trench within the geophysical anomaly area. The purpose of the exploratory trench was to confirm that the anomaly was due to buried drums, and not miscellaneous metal refuse.

Buried drums were encountered within the exploratory trench. Upon inspection it was discovered that approximately 8 to 10 inches of cover material overlaid a horizon of vinyl record centers. Within this horizon, three crushed 30-gallon drums were exposed. Two exposed drums showed no evidence of leakage, and were left in place (see Photograph No. 1, Attachment I). The third drum, which was lifted into the backhoe bucket, was leaking an oily material (see Photograph No. 2, Attachment I). This drum and soil impacted by the leaking material were immediately placed into a steel 85-gallon overpack drum. A sample of the drum contents was collected for gas chromatography (GC) fingerprint analysis. A copy of the chromatogram is provided in Attachment II. Following a review by WEA Manufacturing, Inc.'s (WEA) hydraulic oil expert, it was determined that the material exhibited GC characteristics of a heavy mineral oil (i.e. primarily eluding toward the right of the spectrum), which is consistent with hydraulic oil. Approximately two cubic yards (cy) of excavated material were returned to the trench, pending the mobilization of a full-scale excavation crew.

2.2 DRUM EXCAVATION

Two weeks later, on August 2, 1999, a full-scale excavation crew was mobilized to the Site for the purpose of preparing the Site for the excavation of the drums. The following activities were completed on August 2, 1999:

- installation of silt fence along the southwest perimeter of the work area;
- demarcation of the preliminary excavation footprint;
- construction of personnel and vehicle decontamination facilities; and
- construction of four soil staging areas.

Full-scale excavation of the drums commenced in the location shown in Figure 2, on August 3, 1999. As the excavation was advanced, the excavated soils were segregated into separate stockpiles for surface soils (from grade to the top of the drums), impacted soils (determined by field screening), potentially impacted soils, and visibly impacted soils. As discussed in Section 2.3.3, the stockpiled soils were later sampled for disposal purposes. Since the majority of the drums encountered in the excavation were crushed and empty, the crushed drums were staged in a separate scrap metal stockpile (see Photograph No. 3, Attachment I).

On the first day of excavation activities, a total of five leaking drums were overpacked, and 33 severely crushed drums were placed in the scrap metal stockpile. Each drum that contained liquid was labeled and placed in separate 85-gallon overpack drums (see Photograph No. 4, Attachment I). The preliminary excavation footprint was excavated to an approximate depth of 2.5 feet below grade by the end of August 3, 1999 (see Photograph No. 5, Attachment I). At that depth, the base of the excavation consisted of vinyl record centers.

Excavation continued on August 4, 1999, with the goal of exposing native soil beneath the vinyl record centers. During the removal of the lower layer of vinyl record centers, nine additional crushed drums were removed, inspected, and placed in the scrap metal stockpile. An area of visibly impacted soil was observed on the floor of the excavation, directly below the area where the majority of the buried drums were encountered. Visual inspection and photoionization detector (PID) field-screening were employed to delineate the extent of these soils, and to direct the advancement of the excavation. Approximately 12 cy of visibly impacted soil was excavated from the base of the excavation to a depth of approximately 7 feet below grade (see Photograph No. 6, Attachment I).

ongoing excavation activities at the Site. During the morning of August 5, 1999, Mr. Joseph Iannuzzo from the PADEP Environmental Cleanup Program, Northeast Regional Office, briefly visited the Site to observe the excavation activities. Mr. Iannuzzo returned later in the day with Mr. Robert Conrad and Mr. Leonard Insalaco (Emergency Response Program Manager, PADEP Northeast Field Operations) to observe excavation activities. The PADEP representatives were satisfied with the Site activities, however they direct that the excavated materials (soil and vinyl record centers) could not be used as backfill for the excavation.

By the completion of the excavation activities on August 5, 1999, a total of 48 drums were excavated. Six were placed into over pack drums, and 42 were determined to be scrap metal. All overpacked drums were staged within the locked onsite warehouse. Table 1 provides an inventory of the excavated drums.

Approximately 140 cy of soil/vinyl record centers were excavated; the excavated materials were categorized as follows:

Surface Soil	12 cy
Potentially Unimpacted	58 cy
Potentially Impacted	54 cy
Visibly Impacted	16 cy

The approximate dimensions of the completed excavation were 35 feet long by 20 feet wide. The depth of the excavation ranged from approximately 2.5 feet below grade to 7 feet below grade, at the deepest portion of the excavation (see Figure 3).

Once it appeared that all buried drums had been excavated, McLaren/Hart's geophysical subcontractor, Quantum Geophysics, Inc. (Quantum) conducted a confirmatory geophysical survey (utilizing an EM-61 metal detector) within the excavation footprint. The results of the geophysical survey confirmed that all ferrous/conductive materials within the geophysical anomaly area had been removed.

geophysical survey confirmed that all ferrous/conductive materials within the geophysical anomaly area had been removed.

Following the collection of post-excavation soil samples (see Section 2.4.1), the stockpiles and excavation were secured. The stockpiles were covered with 6-mil poly-sheeting, which was anchored to the surrounding hay bales (see Photograph No. 7, Attachment I). The excavation was surrounded with snow fencing, and a protective cover was constructed over the excavation (see Photograph No. 8, Attachment I).

2.3 ONSITE DRUM AND SOIL MANAGEMENT

2.3.1 Drum Sample Collection

Once the overpacked drums were staged in the staging area within the warehouse, they were categorized according to their hazardous characteristics ("haz catting") for the purposes of identifying waste streams. Only one waste stream was identified, characterized as a low volume of oil-like liquid exhibiting similar odor, color and viscosity in each drum. As a result, two composite samples were collected from the waste stream (sample number D1-D6 and sample number DC). The purpose of these sample was to develop a waste stream profile, and to define the analytical parameter list for the post-excavation soil samples.

The composite waste stream samples were analyzed for:

- Sample D1-D6: Target Compound List/Target Analyte List, plus 40 tentatively identified compounds (TCL/TAL + 40);
- Sample DC: Toxicity Characteristic Leachate Procedure (TCLP) Metals, Organics, Polychlorinated Biphenyls (PCBs), and Pesticides (Full TCLP); and
- Sample DC: RCRA characteristics.

The TCL/TAL+40 analyses were completed at an accelerated rate (results within one week). This allowed for the determination of the analytical parameter list for the post-excavation soil samples. The Full TCLP and RCRA characteristics analyses were completed at a normal rate, with the analytical results available approximately four weeks following sample collection.

Following the receipt of the analytical results from the waste stream sample analyses, all data was validated in accordance with the procedures outlined in the Workplan.

2.3.2 Drum Sample Analytical Results

The analytical results for the sample collected from the contents of the buried drums are presented in Table 2. The laboratory analytical report is included in Attachment III. The data validation report is included in Attachment IV.

The VOCs 1,1-dichloroethylene, tetrachloroethylene (PCE), toluene, and 1,1,1-trichloroethane were detected in the composite sample of the contents of the excavated drums (sample designation D1-D6) at concentrations of 5,370 micrograms per liter ($\mu\text{g/L}$), 199,000 $\mu\text{g/L}$, 2,070 $\mu\text{g/L}$, and 95,600 $\mu\text{g/L}$, respectively.

The SVOCs bis(2-ethylhexyl) phthalate (180,000 $\mu\text{g/L}$) and di-n-butylphthalate (92,200 $\mu\text{g/L}$) were detected in the composite sample of the contents of the excavated drums. It should also be noted that PCE was also detected in the SVOC tentatively identified compound (TIC) scan at an estimated concentration of 352,000 $\mu\text{g/L}$.

The pesticides dieldrin (860 $\mu\text{g/L}$) and endrin ketone (400 $\mu\text{g/L}$) were detected in the composite sample of the contents of the excavated drums.

The following metals were detected in the composite sample of the contents of the excavated drums:

Parameter	Concentration	Parameter	Concentration
Aluminum	52.7	Lead	9.71
Antimony	0.132	Magnesium	23.7
Arsenic	0.048	Manganese	2.88
Barium	58.9	Mercury	0.0429
Cadmium	0.71	Nickel	1.77
Calcium	94	Potassium	13.8
Chromium	1.83	Silver	0.117
Cobalt	0.258	Vanadium	1.97
Copper	45.2	Zinc	242
Iron	290		

Note: All concentrations reported in milligrams per liter (mg/L)

PCE was detected in the TCLP analysis of the composite sample of the drum contents (sample number DC) at a concentration of 2.11 mg/L.

2.3.3 Stockpiled Soil Sample Collection

As stated above, the stockpiled soils were sampled to determine the appropriate offsite disposal scenario. Four composite samples were collected from the stockpiled soils for analysis of TCL/TAL+40, Full TCLP, and RCRA characteristics. Samples for TCL/TAL+40 analysis were composited at the laboratory, while all others were composited in the field. It should be noted that the sample bottle/ware for the TCL SVOC, TCL Pesticides, TAL Metals, PCB and RCRA characteristic analyses of sample SP-2 shattered during transit to the laboratory. A replacement sample (SP-2R) for these parameters was subsequently collected. Following the receipt of the analytical results from the stockpiled soil sample analyses, all data was validated in accordance with the procedures outlined in the Workplan.

Samples SP-1 and SP-2 were further composited in the laboratory to form COMP-1. Samples SP-3 and SP-4 were further composited in the laboratory to form COMP-2. Samples COMP-1

and COMP-2 were analyzed for total petroleum hydrocarbons (TPH) and total organic halides (TOX) for disposal purposes.

2.3.4 Stockpiled Soil Sample Analytical Results

The analytical results for the sample collected from the stockpiled soils are presented in Table 3. The laboratory analytical report is included in Attachment III. The data validation report is included in Attachment IV.

No parameters exceeded either the Pennsylvania Department of Environmental Protection's (PADEP) Residential Direct Contact Medium-Specific Criteria (RDC) or the Soil to Groundwater Pathway Medium-Specific Criteria (STG).

The following VOCs were detected in SP-1, SP-2, SP-3 and/or SP-4:

Parameter	Concentration Range
Acetone	0.209 - 0.281
Methylene Chloride	0.00604 - 0.0133
Methylethyl Ketone	0.0405 - 0.0418
PCE	0.0016 - 0.00812
Toluene	0.00464 (SP-2 only)
1,1,1-Trichloroethane (1,1,1-TCA)	0.00383 - 0.0129
Trichloroethylene (TCE)	0.00677 (SP-2 only)

Note: All concentrations reported in milligrams per kilogram (mg/Kg)

The SVOC bis(2-ethylhexyl)phthalate was detected in SP-1 and SP-3 at concentrations of 0.295 mg/Kg and 0.0738 mg/Kg, respectively. Butylbenzylphthalate was detected in SP-1 and SP-2R at concentrations of 0.112 mg/Kg and 9.37 mg/Kg, respectively.

The following metals were detected in stockpiled soil samples SP-1, SP-2R, SP-3 and/or SP-4:

Concentration		Concentration	
Parameter	Range	Parameter	Range
Aluminum	3,496 - 5,589	Lead	9.9 - 16.8
Arsenic	2.42 - 4.59	Magnesium	1,107 - 1,391
Barium	27.6 - 62.1	Manganese	144 - 704
Beryllium	0.502 - 0.700	Mercury	0.022 - 0.116
Calcium	347 - 699	Nickel	13.3 - 17.5
Chromium	5.46 - 7.83	Potassium	560 - 842
Cobalt	6.10 - 9.17	Sodium	133 - 202
Copper	12.5 - 17.8	Thallium	0.104 (SP-4 only)
Iron	16,250 - 29,120	Vanadium	7.40 - 13.1
		Zinc	37.9 - 57.7

Note: All concentrations reported in mg/Kg

The TPH concentrations in COMP-1 and COMP-2 were 587 mg/Kg and 2,040 mg/Kg, respectively.

The TOX concentration in COMP-2 was 48.4 mg/Kg. TOX was not detected in COMP-1 above the Method Detection Limit of 20 mg/Kg.

No compounds were detected in the TCLP analyses conducted on samples SP-1, SP-2R, SP-3 or SP-4

2.4 POST EXCAVATION SOIL SAMPLE COLLECTION AND ANALYSIS

2.4.1 Sample Collection

Following the completion of the excavation, eight post-excavation soil samples, one duplicate sample, and a method spike/method spike duplicate sample (MS/MSD) were collected from the

base and sidewalls of the portion of the excavation that extended to a depth of 7 feet below grade (see Figure 3). The post-excavation samples were forwarded to the laboratory immediately, however since the analytical parameter list was determined by the results of the sampling of the contents of the excavated drums, (see Section 2.3.2), the analytical procedures were put on hold, pending the results of the drum sampling. All analyses were subsequently performed within appropriate holding times.

Once the analytical results from the sampling of the drum contents was completed, all post-excavation samples were analyzed at an accelerated rate (analytical results available within one week) for: Target Compound List Volatile Organic Compounds, plus a library search of 15 tentatively identified compounds (TCVOCs+15); Target Compound List Semi-Volatile Organic Compounds, plus a library search of 25 tentatively identified compounds (TCSVOCs+25); and as requested by Advanced Geoservices Corp. (AGC) and TC Pesticides.

Following the receipt of the analytical results (see Section 2.4.2) for post-excavation soil samples, all data was validated in accordance with the procedures outlined in the Workplan.

2.4.2 Analytical Results

The analytical results for the post-excavation soil samples are presented in Table 4. The analytical results for the Quality Assurance/Quality Control (QA/QC) samples associated with the post-excavation soil samples are presented in Table 5. The laboratory analytical report is included in Attachment III. The data validation report is included in Attachment IV.

No parameters exceeded either the PADEP's RDC or STG. As a result, the SPLP analyses were not completed

The following VOCs were detected in the post-excavation soil samples:

Parameter	Concentration Range	PADEP Residential Direct Contact	PADEP Soil-to- Groundwater r
Acetone	0.0368 - 0.264	10,000	370
1,1-Dichloroethane	0.00443 (SW-2 only)	12	2.7
Methylene Chloride	0.00655 - 0.0175	670	0.5
Methylethyl Ketone	0.133 (SW-2 only)	10,000	280
Methylisobutyl Ketone	0.00841 (SW-2 only)	1500	22
PCE	0.00339 - 0.0144	340	0.5
1,1,1-TCA	0.00558 - 0.0994	10,000	20

Note: All concentrations reported in milligrams per kilogram (mg/Kg)

The SVOC bis(2-ethylhexyl)phthalate was detected in SW-3 and B-1 at concentrations of 0.992 mg/Kg and 0.120 mg/Kg, respectively. Butylbenzylphthalate was detected in B-1 at a concentration of 0.145 mg/Kg.

No TC Pesticides were detected in the post-excavation samples.

2.5 EXCAVATION BACKFILL

On September 24, 1999, following the receipt of the analytical results from the post-excavation soil samples (see Sections 2.4.2), McLaren/Hart and Code mobilized the necessary equipment, material, and personnel to backfill the excavation. The temporary structure covering the excavation was removed and approximately 195 tons of construction grade fill material was placed in the excavation (see Photograph No. 9, Attachment I). Analytical results for the fill material is included in Attachment V. The fill material was placed in 12-inch lifts and was compacted utilizing a machine-mounted vibratory plate compactor. The finish grade of the fill material was such that a smooth transition to the surrounding grade and slope was achieved (see Photograph No. 10, Attachment I).

2.6 DRUM DISPOSAL

On November 11, 1999, McLaren/Hart mobilized the necessary personnel and equipment to transport the stockpiled crushed drums to the Freehold Cartage, Inc. facility in Freehold, New Jersey for disposal as scrap metal. The Bill-of-Lading for the transportation of the crushed drums is included in Attachment VI.

PCE was detected in the TCLP analysis of the drum contents at a concentration of 2.11 mg/L. In accordance with 40CFR261.24, the drums were classified as D009 hazardous waste.

On November 11, 1999, McLaren/Hart mobilized the necessary personnel and equipment to transport the overpacked drums to the Cyclechem, Inc. facility in Elizabeth, New Jersey for disposal as D039 waste. The Hazardous Waste Manifest for the disposal of the overpacked drums is included in Attachment VI. Copies of the transmittal letters for the generating state agency (PADEP) and the receiving state (New Jersey Department of Environmental Protection) are include in Attachment VII.

2.7 SOIL DISPOSAL

On November 22, 1999, the stockpiles of surface soil and visibly impacted soil (approximately 40 cy) were transported to the R₃ Technologies, Inc. (R₃ facility) in Morrisville, Pennsylvania for thermal treatment. The non-hazardous waste manifests for these soils are included in Attachment VI. The R₃ facility will provide a Certificate of Destruction for these soils that will be provided separately.

On December 3, 1999, the stockpiles of potentially impacted and potentially unimpacted soils (approximately 100 cy) were transported to the American Waste Management Services, Inc. American Landfill in Waynesburg, Ohio. These soils could not be treated at the R₃ facility

because there was too much debris (vinyl record centers) in the soil. The non-hazardous waste manifests for these soils are included in Attachment VI.

2.8 SITE INSPECTIONS

During the interim time period between the completion of the excavation activities, backfilling of the excavation, and transportation of the excavated materials (soils and drums) from the Site, McLaren/Hart and Code personnel completed six site inspections on the following dates:

August 10, 1999	September 1, 1999
August 17, 1999	September 8, 1999
August 24, 1999	September 17, 1999

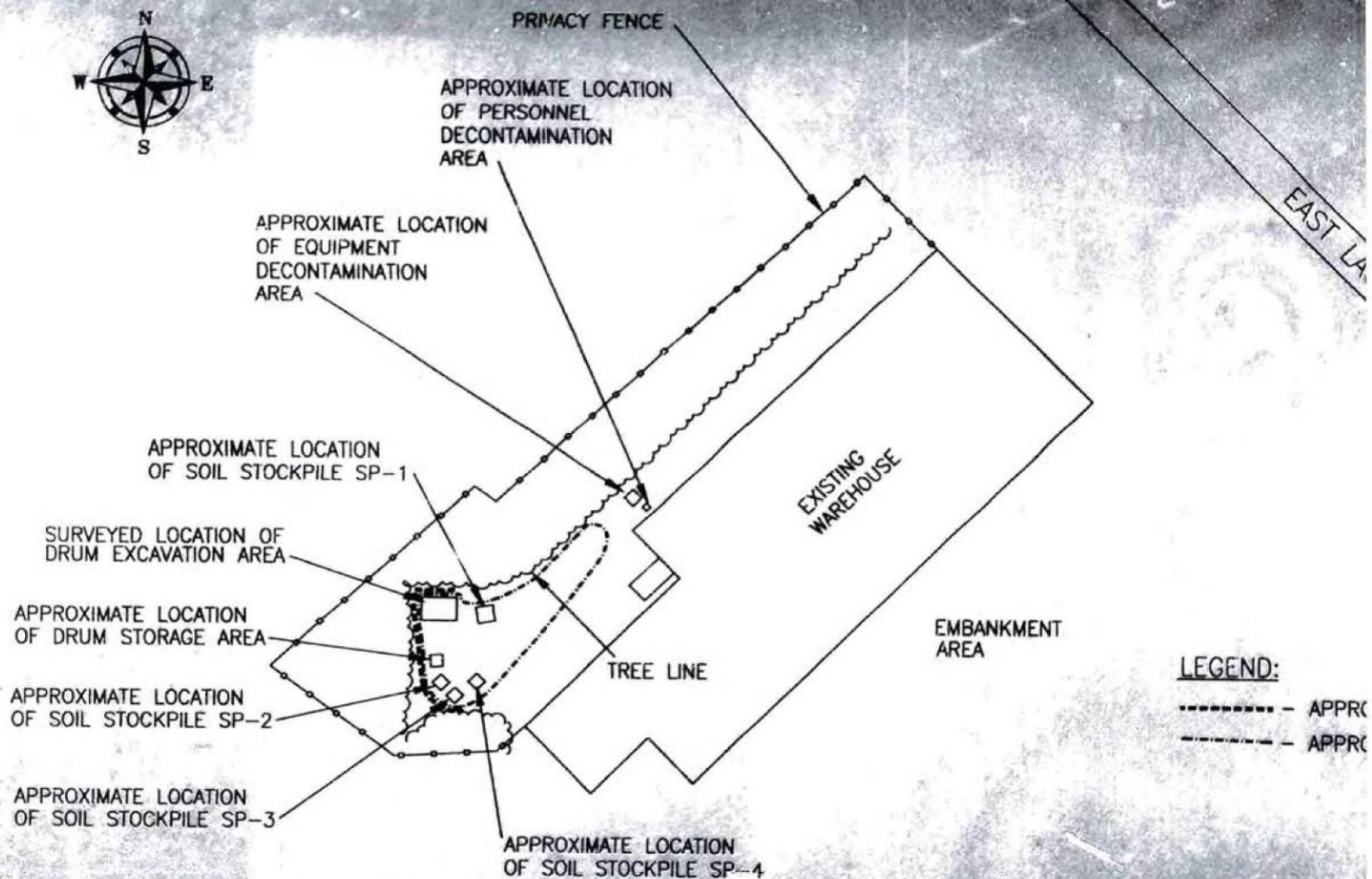
During each of these events, the stockpile and excavation covers were inspected and replaced/repared, if necessary. The over packed drums located within the locked warehouse were also inventoried.

2.9 SITE RESTORATION

In accordance with the Workplan, following the backfilling of the excavation, and the transportation of the soil and drums from the Site, the Site was restored to pre-excavation conditions. The excavation was backfilled (as discussed in Section 2.5), the personnel and equipment decontamination areas, as well as the soil staging areas were dismantled, and the silt fencing was removed. All poly-sheeting was disposed along with the waste material with which it was associated. All PPE was drummed and disposed along with the overpacked drums. The bills of lading for the waste disposal are included in Attachment V.

3.0 CONCLUSIONS

Based on the analytical results from the stockpiled soil sampling and the post-excavation soil sampling there were no exceedances of the PADEP's RDC or STG in soils associated with the former buried drums. The results of the post-excavation geophysical survey indicated that all buried drums within the geophysical anomaly have been excavated.



REV	DATE	DESCRIPTION	APP

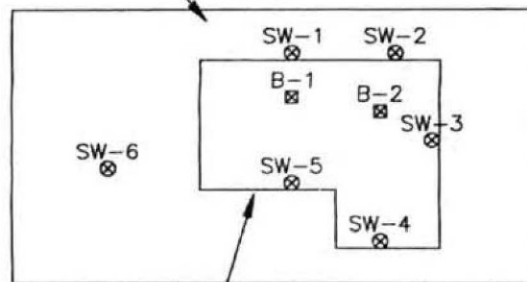


SITE LAYOUT

1005 EAST ...



EXCAVATION
DEPTH APPROXIMATELY
2.5 FEET BELOW GRADE

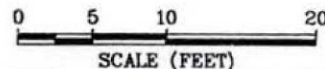


EXCAVATION DEPTH
APPROXIMATELY 7 FEET
BELOW GRADE

LEGEND:

SW-1 SIDE WALL SAMPLING
⊗ LOCATION

B-1 BASE SAMPLING
⊠ LOCATION



**POST EXCAVATION SOIL SAMPLE
LOCATIONS**

FERN HILL FACILITY
1055 EAST LACKAWANNA AVENUE, OLYPHANT, PENNSYLVANIA

DRWN:RME	SCALE: AS NOTED
CHK'D:	DATE: 12-03-99
APP'D:	FIGURE 3

Table 1
Excavated Drum Inventory
Fern Hill Facility - Olyphant, Pennsylvania

Drum Number	% Crushed	Drum Color	Size (Gal.)	Drum Label
D-1	50	blue	30	None
D-2	50	none	30	None
D-3	75	blue	55	None
D-4	50	none	55	None
D-5	50	none	30	None
D-6	50	none	55	None
1	30	blue	30	None
2	100	white	30	6803500
3	75	blue	30	None
4	75	white	55	"LGEAR G34"; "D8-2"
5	100	none	55	None
6	100	blue	30	None
7	100	silver	55	CRUSH
8	100	silver	55	None
9	90	none	55	None
10	100	blue	30	None
11	100	blue	55	None
12	90	none	55	None
13	50	silver	55	Lubricating Oil; SIT S20; D.T.E. 26
14	50	blue	30	None
15	75	blue	30	Stuck along road
16	100	blue	30	None
17	100	blue	30	None
18	100	blue	30	None
19	100	white	30	None
20	100	blue	30	None
21	75	blue	30	Allied "GEN SOLV"
22	75	blue	30	None
23	90	blue	30	None
24	75	green	55	"BAD OIL"; "FREON TF"
25	75	blue	30	"BAD OIL"
26	90	blue	30	None
27	100	white	30	may be harmful if swallowed; 58820
28	100	none	55	None
29	75	black	55	Allied Materials
30	100	blue	55	None
31	75	blue	30	None
32	90	blue	30	None
33	90	black	55	None
34	100	blue	30	empty
35	100	blue	30	None
36	90	blue & white	55	None
37	100	black	55	Allied Materials
38	100	blue	30	None
39	100	none	55	None
40	100	none	55	None
41	90	white	30	None
42	100	blue	30	None