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Administrative Record

COMMONWEALTH OF PENNSYLVANIA, Department of Environmental Resources

February 27, 1989

SUBJECT: Recommended Strategy: Vanport Groundwater Contamination

TO: Donald A. Brown, Director

Bureau of Hazardous Sites and

Superfund Enforcement

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Remedial Response

Bureau of Waste Management

FROM: Bill Bailey WNB

Hazardous Sites Cleanup & Superfund

Enforcement Program
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The following is the recommended strategy for pursuing the cleanup of the Vanport Groundwater Contamination.

MDB/cb

Enclosure

SOUTHWESTERN KLUGN

CONFIDENTIAL ATTORNEY CLIENT-PRIVILEGE ATTORNEY WORK PRODUCT - NON-DISCOVERABLE REQUEST FOR LEGAL SCREENING ANALYSIS

OUTLINE FOR SITE SPECIFIC STRATEGY HAZARDOUS SITES CLEANUP PROGRAM VANPORT GROUNDWATER CONTAMINATION

Technical Staff Evaluation

I. General Background

A. Site Name and Address

The Vanport Township Municipal Authority (VTMA) offices are located at 285 River Avenue in Vanport Township, Beaver County, Pennsylvania. Their well field is behind the office adjacent to the Ohio River, and consists of six wells, five of which are in production. The wells obtain their water from the alluvial sediments of the Ohio River aquifer.

B. History

Trichlorethylene (TCE) and 1,1,1-Trichloroethane were discovered in the Vanport water system in January 1988 following testing of the water subsequent to the Ashland Oil Company spill. At the present time the source of the contamination is unknown. Analysis of the Ohio River at the same time did not reveal TCE contamination of the river. This would indicate that the contamination of the VTMA well field is not caused by recharge of the aquifer by the Ohio River. Possible sources of the contamination include:

- 1. Westinghouse The Westinghouse Electric Corporation Beaver Plant is located approximately 2,500 feet northeast of the site. Westinghouse is the only known large quantity user of TCE and 1,1,1-Trichloroethane in the vicinity. A groundwater evaluation is being conducted by Westinghouse on their property. On June 15, 1988 Department personnel obtained split samples from several Westinghouse wells. Analysis of these samples showed TCE concentrations as high as 48,000 ug/l.
- 2. Abandoned sand and gravel quarry The Beaver sand and gravel quarry is located approximately 1,000 feet north of the VTMA well field. The quarry ceased operations in the mid-60's. A former quarry employe alleges that Westinghouse disposed large amounts of industrial waste in the quarry while it was in operation. The hydrogeological evaluation currently being conducted by the Department is focusing on the area around the quarry. An analysis of historical aerial photographs may be helpful in determining the extent of waste disposal in the quarry. EPA estimates the cost of the photo interpretation to be \$6,800. Present owners of the quarry include:

- a. Nick Crivelli Chevrolet, Inc., 294 State Street, Beaver, PA 15009.
- b. Bell Telephone, One Parkway, Philadelphia, PA 19102.
- c. Wyko Construction, Box 14, Sewickley, PA 15143.
- 3. Crivelli Chevrolet While surveying the area for possible sources of TCE contamination a storm sewer pipe was discovered discharging into the quarry. The discharge had a distinct oily sheen. The Department discovered that the floor drain in Crivelli Chevrolet was connected into this storm sewer. Samples of the discharge were collected and analyzed; no TCE was detected, however, 1,1,1-Trichloroethane was discovered in the discharge. Based on the preliminary evidence thus far collected, it appears unlikely that Crivelli is a source of the TCE contamination.

C. Priority Within the Region

The VTMA site has been designated as the first priority in Region V. This is because of the high TCE levels discovered to be in the drinking water system. TCE is a class B2 carcinogen. Levels greater than 100 ug/l have been documented in the VTMA system. This is far in excess of the federal primary maximum contaminant levels (MCL) of 5 ug/l or the Department's action level of 26 ug/l. VTMA serves approximately 10,000 residents of Vanport and Brighton Townships. Within the service area are also a hospital and a school.

II. Technical Issues

A. Technical Background

- 1. A preliminary HRS scoring was performed on the site. The REP score is 46.04. The HRS score would be similar except that the analytical data was not from an EP contract lab and therefore cannot be used to document an observed release. As more data about the site becomes available, both the HRS and REP scores will likely be higher than that mentioned above.
- 2. Pathways/Receptors The Vanport Township Municipal Authority serves Vanport and Brighton Townships. VTMA distributes an average of 1.55 MGD to approximately 10,000 residents in the two communities. The system also serves a school and hospital. In addition to ingestion through the drinking water, exposure through direct contact and inhalation is also possible while bathing and cooking.

B. Response Decision - At the present time enough information is available to consider various interim actions, however more data is needed to assess any remediation.

C. Data Gaps

Separate hydrogeologic investigations are being conducted by the Department, Westinghouse and VTMA. Hopefully, enough information will be obtained from these studies to determine:

- 1. The source of the contamination.
- 2. The extent of the contamination.
- Groundwater flow conditions and quality in the vicinity of the well field, quarry, and Westinghouse plant.
- 4. The most appropriate technology to base a response decision on.

D. Likely Responses

- Interim responses include:
 - a. No response.
 - Groundwater study.
 - c. Groundwater collection and treatment.
 - d. Provide alternate water supply from another system.
 - e. Provide bottled water or water buffaloes.
 - f. Provide temporary treatment of the drinking water.

Of the alternatives listed above, the most reasonable and effective at the present time would be to provide temporary treatment of the drinking water. VTMA is currently investigating various systems to eliminate TCE from the finished water supply. However, installation of the permanent system may not be accomplished for a year or more. Installation of a temporary system, as an HSCA Interim Action, could provide a safe water supply to VTMA customers while a permanent system is being developed. The most cost effective temporary system appears to be a portable air stripper. A portable air stripper could remove TCE from the water with a greater than 99.9% efficiency. Informal quotes obtained by telephone inquiry have stated that a portable air stripper could be on-line and operational within one week of approval of the project. Of course the individual characteristics of the VTMA system would affect installation time. Evaluation by the GTAC contractor may be helpful in determining installation details.

- Possible remedial responses include:
 - a. No response.
 - b. Source controls.
 - c. Groundwater collection and treatment.
 - d. Provide permanent alternate water supply.

More data must be obtained to assess any remedial responses.

F. Cost Estimates

The estimated cost of installing a portable air stripper at VTMA for one year is \$100,000 to \$200,000. This estimate is based on a quote of

\$1,500 a week rental x 52 weeks Mobilization and demobilization Contingencies Total

\$78,000 10,000 \$12,000 to 112,000 \$100,000 to 200,000

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Note: The contingencies include but are not limited to plumbing the air stripper into the VTMA supply system. Before a more precise cost estimate can be determined, an assessment of the VTMA system must take place.

III. Government Involvement

A. DER

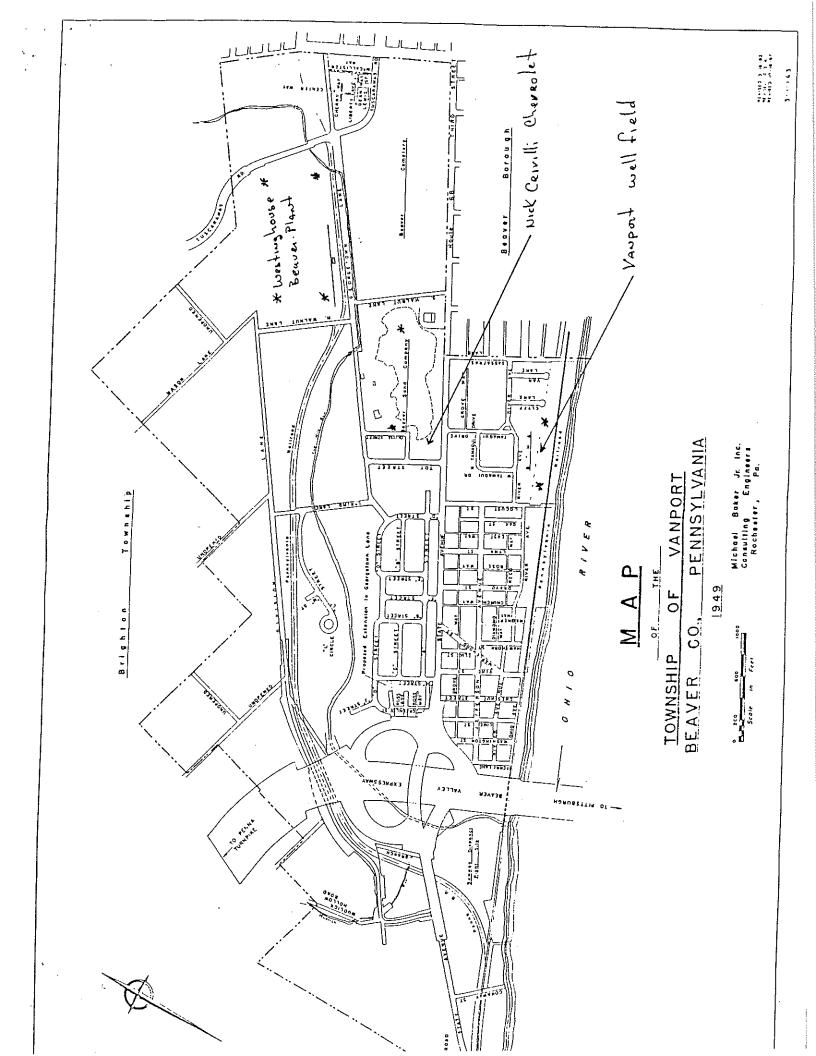
Westinghouse - At one time electroplating operations were con-1. ducted at the plant that utilized a series of inground dip tanks that contained a variety of chemicals in both acid and basic solutions. In October 1983 a fluid seep was discovered near these storage tanks. As a result a groundwater investigation was conducted which included the installation of numerous monitoring wells. The main contaminants identified during the investigation were cyanide and silver. The groundwater was not analyzed for volatile organic compounds (VOC's) at that time. Based on the findings of that initial investigation, Westinghouse submitted a groundwater assessment and abatement plan entitled "Revised Remedial Action Plan - Westinghouse Plant" dated March 1987. Implementation of that plan was delayed after the discovery of high levels of VOC's in the area. Since then Westinghouse has begun a groundwater assessment to address the VOC contamination. That investigation is based on the March 1987 plan, with revisions requested by the Department. On February 9, 1989 the Department issued an NOV to Westinghouse because of the high levels of TCE and 1,1,1-Trichloroethane found in Westinghouse's wells.

- 2. Crivelli Chevrolet While surveying the quarry area on April 28, 1988 for possible sources of TCE contamination, it was discovered that the floor drains of Crivelli were connected to a storm sewer which discharged into the quarry. Analysis of the discharge revealed contamination with various organic compounds. The compounds found are typical constituents of gasoline and cleaning solvents. A Notice of Violation was sent to Crivelli Chevrolet on July 1, 1988 by the Bureau of Water Quality Management.
- 3. VTMA No enforcement action has been initiated against VTMA.

B. EPA

The EPA Drinking Water Section has been advised of the situation at Vanport. They have identified 11 sets of historical area photographs and prepared a cost estimate worksheet for a photo interpretation of the quarry area. Otherwise EPA involvement has been minimal.

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TRICHLOROETHYLENE

Common Synony *nchloroethylene Trickene Algyren Chlorylen	1	Coloness Sweet odor	6. FIRE HAZARDS 6.1 Fleeh Point 90°F D.C. practically contaminates 9.2 Fleenmable Limits in Air. 8.0%-10.5%	10. HAZARD ASSESSMENT CODE (See Hazard Assessment Handbook) A-X-Y
Gemaigene Tremviene Tremoran, Triene		•	6.3 Fire Extinguishing Agents: Water log	
Stop decher Avoid contact Call fire deci	pe if possoble. Keen people swe it with least and vacor, atment, emove discharged material, earth and pollution control agen		4. Fire Extragularing Agents Not to be Used: Not centered 5. Special Huzzards of Combustion Products: Tools and imitating gases are produced in fire situations 6.8 Behavior in Fire: Not pertnent 6.7 Ignition Temperature: 270°F 6.8 Electrical Huzzard: Not pertnent	11. HAZARD CLASSIFICATIONS 11.1 Code of Federal Regulations: ORM.A 11.2 NAS Hazard Rating for Bulk Water Transportation: Category Rating
Fire	Combustione POISONOUS GASES ARE PI Wear googles and self-conta Exangusan with dry chemical.	red breathing apparatus.	6.9 Burning Rater, Not perbrient 6.10 Adequate Flame Temperature: Data not avasace 6.11 Stochhometric Air to Fuel Ratio: Data not avasace 6.12 Flame Temperature: Data not avasable	Fee
Exposure	or loss of consciousness Remove contaminated clothe Flush affected areas with per IF Next EyES, hold eyerids open IF SWALLOWED and victim of mak and have victim IE SWALL I OWED and victim	e artificial respiration, sygen. ea, vomiting, difficult breathing, in, g and shoes.	7. CHEMICAL REACTIVITY 7.1 Resectivity with Watert No reaction 7.2 Resectivity with Common Meseriale: No reaction 7.3 Stability During Transport: Stable 7.4 Neutralizing Agents for Acids and Calistics: Not pertner 7.5 Polymerzadort: Not pertner 7.6 Inhibitor of Polymerization: Not pertner 7.7 Motar Ratio (Reactant to Products: Data not avanable 7.8 Resectivity Group: 36	Reactivity Other Chemicists
				12. PHYSICAL AND CHEMICAL PROPERTIES 12.1 Physical State at 15°C and 1 atm:
	Effect of low concentrations May be dangerous if it erren	on agustic He is unknown.	1 1	Liquid 12.2 Molecular Welgrit 131.39
Water Pollution	Howy local health and wide	e officials.		12.3 Boiling Point at 1 atm: 185°F = 87°C = 360°K
Politicon	Notify operators of nearby w	400 FKSA46.		12.4 Freezing Point: 123.5°F == -86.4°C == 186.8°X
(See Response Should be re	Experience (LUBEL 1.1 Category: None 2.2 Class: Not pertnert	WATER POLLUTION 8.1 Advantio Toziony: 660 mg/1/40 hr/dephnia/xii/fresh water 8.2 Waterfowl Toziony: Ceta not ava/able 8.3 Stologocal Ozygen Demand (BOO): Data not avalable 8.4 Food Chain Concentration Potentiel:	12.5 Critical Temperature: Not pertrent 12.6 Critical Pressure: Not pertrent 12.7 Specific Gravity: 1.46 at 20°C (found) 12.8 Liquid Surface Teneson: 29.3 dynes/cm = 0.0293 N/m at 20°C 12.9 Liquid Water Inherfactal Tenesion: 34.5 dynes/cm = 0.0345 N/m at 24°C
	mCCls nessor: 9.0/1710 '10	4. OBSERV/PLE CHURACTERISTICS 4.1 Physical State (as ehipped): Liquid 4.2 Ceber: Colories 4.3 Odon: Chloroform-But; ethersel	None	12.10 Vacor (Gas) Southfic Gravity: 4.5 12.11 Ratio of Specific Heats of Vapor (Gas): 1.116 12.12 Latent Heat of Vaportzation: 103 Blu/lb = 57.2 cat/g = 2.4 x 103 J/kg 12.13 Heat of Comboustion: Not pertnent 12.14 Neat of Decorposation: Not pertnent 12.15 Heat of Solution: Not pertnent 12.16 Heat of Polymertzation: Not pertnent
apperatus to necorons as Symptoms for myout to necorons and INGESTION: assignify make a signify make a traceas of on respectation a recent three water SKIN.	ective Equipment: Organa, vacini emergencies; necerone or vinces; necessor sust or application (Exposum: INHALATIO (Leed, an attitude of irresponsibilitam resutting in cardac feature, it symptoms emitar to inhelation, it symptoms emitar to inhelation. Exposume: Oo NOT administer emposume: Oo NOT administer emposume; INHALATION: remond/or administer oxygen; INHALATION: remond/or administer oxygen; INHALATION: remond (Leed) (Le	ht symptoms range from intestion of the nose and injt, blurred vision, and finally desurbance of central Chronic exposurs may cluste organic rivary, SKINh detailing action can cause deministis. EYES: adminish or epinephnne; get medical attention for all we wichin to freen air; if necessary, apply antificial STION: here victim drink writer and include vomiting specimisars in water. EYES: flush thoroughly with divarm water.	9. SHIPPING INFORMATION 9.1 Grades of Purity: Technica; ory cleaning, degressing; sattlaction 9.2 Storage Temperature, Artisent 9.3 Insert Abmospheric, No requirement 9.4 Venting: Pressure-vacuum	12.25 Heat of Fusion: Cata not available 12.26 Limiting Value: Data not available
5.5 Short Term in 5.6 Toxicity by in 5.7 Late Toxicity: 5.8 Yepor (Gas) in system if pre 5.9 Liquid or Solid	sheation Limits: 200 ppm for 3 gestion: Grade 3: LDso = 50 t Data not available intant Characteristics: Vapors seent in high concentrations. This id intriant Characteristics: More cause sourcing and reddening set 50 ppm.	o 500 mg/kg cause a slight smaring of the eyes or respiratory e effect is temporary num hazard, if spirled on clothing and allowed to		NOTES

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TRICHLOROETHYLENE

12.17 SATURATED LIQUID DENSITY		12.18 LIQUID HEAT CAPACITY		12.19 LIQUID THERMAL CONDUCTIVITY		12.20 LIQUID VISCOSITY	
Temperature (degrees F)	Pounds per cubic foot	Temperature (degrees F)	British thermal unit per pound-F	Temperature (degrees F)	British thermal unit-inch per hour- square loot-F	Temperature (degrees F)	Centipoise
	94.669	0	.220		N	15	.800
0	94.669	10	.221		0	20	.775
5	94.410	20	.223		Ť	25	.750
10	93.889	30	.225		•	30 :	,727
15		40	.226	į	ρ	35	.705
20	93.629	4 0 50	.228		٤	40 '	.684
25	93.370	50 60	.230		Ř	45	.664
30	93,110	70	.231		T I	50	.645
35	92.849	80	.233]	i l	55	.627
40	92,589	90 1	.235	}	Ň	60	.610
45	92.330	100	.236		Ē	65	.593
50	92.070		.238		พ	70	.577
55	91.809	110		1	7	75	.562
60	91.549	120	.240	ł	,	80	.548
65	; 91.290	130	.241		•	85	.534
70	1 91.030	140	.243			90	.521
75	90.770	150	.245			90 95	.508
80	90.509	160	.246			100	.506
85	90.250	170	.248				
90	89.990					105	.485
95	89.730		-	1	'	110	.474
100	89.469					115	.463
105	89.209		!			120	.453
110	88.950		1				
115	88.690			1		i	
120	88.429					· 1	
125	88:169				į	i	

	12.21 Y IN WATER	SATURATED V	12.22 APOR PRESSURE		12.23 /APOR DENSITY		12.24 IEAT CAPACITY
Temperature (degrees F)	Pounds per 100 pounds of water	Temperature (degrees F)	Pounds per square inch	Temperature (degrees F)	Pounds per cubic foot	Temperature (degrees F)	British thermal un per pound-F
77.02	.110	40 50 60 70 80 90 100 110 120 130 140 150 160 170	.508 .678 .894 1.166 1.507 1.929 2.448 3.081 3.881 4.765 5.862 7.163 8.695 10.490	40 50 60 70 80 90 100 110 120 130 140 150 160 170 180	.01245 .01628 .02105 .02695 .03418 .04296 .05354 .06619 .08120 .09891 .11960 .14380 .17180 .20390	0 25 50 75 100 125 150 175 200 225 250 275 300 325 350	.136 .139 .143 .146 .149 .152 .155 .157 .160 .162 .165 .167 .169
		190 200 210	15.010 17.810 21.020	190 200 210	.28280 .33040 .38420	375 400 425 450 475 500 525 550 575 600	.176 .177 .179 .181 .182 .184 .185 .186 .187

TRICHLOROETHANE

Common Synon : 11-"nchoroethene Westnychorostom	yma Watery sound	Coloriess Server odor	5. FIRE HAZARDS 6.1 Flowin Point: Cata not available 6.2 Flowmable Limits in Air: 7%-16%	18 MAZARD ASSESSMENT CODE (See Plezard Assessment Hendbook)
Aurothure Choroliwie	Service on weater for	wating vapor is produced	8.2 Phenometer Centre of No. 7 %-10 % 8.3 Fire Extinguishing Agents: Ory chemical foam, or carbon disorde 8.4 Fire Extinguishing Agents Not to be	A-X-Y
Avoid coms. Call fire deco	re if possible. Xeeo pecole invi : with liquid and vapor ument emove cischarped material earth and pollution control age	,	Used: Not pertnern 8.5 Special Hazarda of Combustion Products Toxic and smisting pases are generated in freet. 6.6 Behavior in First Not pertnern 8.7 Igration Temperature: 932°F 6.8 Electrical Hazards Not pertnern	11. HAZARO CLASSIFICATIONS 11.1 Cede of Federal Reguletionsc. CRALA 11.2 NAS Hazard Resing for Bulk Water Transportstors Category Reting
Fire	Computation POISSONUS GASES ARE F Wear googles and self-conta Exangusin with dry chemical	anad breathing apparatus	6.9 Burning Rate: (est.) 2.9 mm/mm 6.10 Adiabatic Flams Temperatura: Data not available 6.11 Stoichiometric Air to Fuel Ratio: Data not available 6.12 Flame Temperatura: Data not available	Fre
Exposure	IF SWALLOWED and victim or milk and have victim is Swall OWED and victim	e or deficual respiration, usygen, ususes, ng and shows.	7. CHEMICAL REACTIVITY 7.1 Reactivity With Waher: Reacts stowly, releasing corrosive hydrochlonic soci. 7.2 Rescriptly with Convenion Meterials: Corrodes sharman, but reaction is not histarchous. 7.3 Solisity During Transport: Stable 7.4 Heustratizing Agents for Acide and Causes in Not partners! 7.5 Polymerization: Not pertners! 7.6 Inhibitor of Polymerization: Not pertners! 7.7 Moler Ratio (Reactivit to Product): Data not available 7.8 Reactivity Group: 36	Pascitivity Other Chemicals
Water Pollution	Effect of low concentrations May be cangerous if it enter Nostly local health and swidth Nostly operators of healthy in	a ween artaken. In officials.		12. PHYSICAL AND CHEMICAL PROPERTIES 12.1 Physical State at 18°C and 1 storc Liquid 12.2 Sholecular Weight 133.41 12.3 Swilling Print at 1 storc 165°F = 74°C = 347°K 12.4 Freezing Points
(See Peoporate Should be re	INSE TO DISCHARGE invitode (Handbook) invoved d physical treatment	2. LASEL 2.1 Category: None 2.2 Case: Not pertnern	B. WATER POLLUTION 8.1 Aquatic Toxicity: 75-150 ppm*//pmfss//TL_/sait water "Time period not apecified. 8.2 Waterfowl Toxicity; Data not available 8.3 Biological Oxygen Developed (BOD): Deta not evaluable 8.4 Food Chain Concentration Potentick	<-30°F = <-30°C = <234°K 12.5 Critical Temperature. Not pertrent 12.6 Critical Freewarts. Not pertrent 12.7 Specific Gravity: 1 31 at 20°C (Kazd) 12.8 Liquid Surface Tempera: 25.4 dynes/cm = 0.0254 N/m at 20°C 12.9 Liquid Water Inhartschaft Tempera: (est.) 45 dynes/cm = 0.045 N/m at 20°C
	estore Not School 31	4. OBSERVABLE CHARACTERISTICS 4.1 Physical State ins shapped's Liquid 4.2 Color: Colorida 4.3 Odor: Chlorotom-linc sessessin	None	12.10 Vapor (Gas) Specific Gravity: 4.6 12.11 Relatio of Specific Healts of Vapor (Gas): 1.104 12.12 Labore Healt of Vapor Santing: 100 Stutts = 59 cat/g = 2.4 X 10 ³ J/kg 12.13 Healt of Communication: (est.) 4700 Stu/b = 2800 cat/g = 110 X 10 ⁴ J/kg 12.14 Healt of Decomposition: Not performed 12.15 Healt of Sources: Not performed
apparatus for and face are necessarily apparatus for necessarily appropriate for necessarily appropriate for necessarily approximate for necessarily apparatus for necessarily	active Equipment Organic visit ir emergencies; heoprene or po- aid; neoprene servey shose (or polyveryl elochol tast or apron- foreving Exposents; IN-HALATIO in to lose of correctiousness, high combined with loss of conscio- diring cause some feeling of in ng action mey cause demanded Exposents; Get medical elements to NOT sommelies admension or it persons victim to fresh act; it	Rt. symptoms range from loss of aculiabrum and in concentration can be least due to amove amount. NIGESTICH: produces effects senilar to acuses. EYES; slightly stituting and lactnymestory.	9. SHIPPING INFORMATION 2.1 Gradess of Purity: Unshibited; substant inhibited; substant inhibited; while room; cold cleaning 3.2 Storage Temperature: Arribant 4.3 Insert Atmospheric: No requirement 5.4 Vessing: Pressure-victuum	12.18 Heart of Polymentzation: Not pertnent 12.25 Heart of Fowon: Oats not available 12.26 Lenting Yasue: Data not available 12.27 Reid Vaoor Pressure: 4.0 pass
5.4 Threshold Lim 5.5 Short Yerm Int 5.6 Toxicity by Inc 5.7 Late Toxicity: 6.8 Vapor (Ges) in jystem 4 pre 6.9 Liquid or Solid	at Yeaker 350 ppm hameston Limitte 1,000 ppm for peetfork Grade 1; LDse = 5 to Data not aveilable ritanic Characteristics: Vaporsement in high concentrations. The latitude Characteristics: Manual Characteristics: Minus cause amening and recidening leb; 100 ppm.	15 g/kg (mt, mouse, nabbt, guines prg) Cause a elight amering or the eyes or respiratory e effect is temporary. num hizzard, if applied on clothing and allowed to	**	OTES

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TRICHLOROETHANE

12.17 SATURATED LIQUID DENSITY		12.18 LIQUID HEAT CAPACITY		12.19 LIQUID THERMAL CONDUCTIVITY		12.20 LIQUID VISCOSITY	
Temperature (degrees F)	Pounds per cubic toot	Temperature (degrees F)	British thermal unit per pound-F	Temperature (degrees F)	British thermal unit-inch per hour- square foot-F	Temperature (degrees F)	Centipoise
0 10 20 30 40 50 60 70 80 90 100 110 120 130 140 150	85.419 84.870 84.309 83.759 83.200 82.650 82.089 81.540 80.981 80.429 79.870 79.320 78.759 78.209 77.650 77.099 76.540	55 60 65 70 75 80 85 90 95 100 105 110 115 120 125 130 135 140	.240 .242 .244 .246 .248 .250 .252 .254 .256 .258 .260 .262 .264 .266 .268 .270 .272		N O T P E A T I N E N T	15 20 25 30 35 40 45 50 55 60 65 70 75 80 85	1,363 1,295 1,231 1,172 1,117 1,065 1,017 1,972 1,929 1,889 1,852 1,817 1,784 1,753 1,723

	12.21 Y IN WATER	SATURATED V	12.22 APOR PRESSURE		12.23 /APOR DENSITY		12.24 IEAT CAPACITY
Temperature (degrees F)	Pounds per 100 pounds of water	Temperature (degrees F)	Pounds per square inch	Temperature (degrees F)	Pounds per cubic foot	Temperature (degrees F)	British thermal unit per pound-F
(degrees F) 68.02	.070	70 75 80 85 90 95 100 105 110 115 120 125 130 135 140 145 150 155 160 165 170 175	2.099 2.364 2.657 2.980 3.335 3.725 4.152 4.619 5.130 5.686 6.292 6.950 7.663 8.437 9.273 10.180 11.150 12.200 13.330 14.540 15.840 17.240	70 75 80 95 90 95 100 105 110 115 120 125 130 135 140 145 150 155 160 165 170	.04925 .05495 .06119 .06799 .07540 .08346 .09220 .10170 .11190 .12300 .13490 .14770 .16150 .17630 .19220 .20920 .22730 .24670 .26730 .28930 .31270 .33760	0 25 50 75 100 125 150 175 200 225 250 275 300 325 350 375 400 425 450 475 500 525	.146 .150 .155 .159 .163 .167 .171 .175 .179 .183 .186 .190 .193 .196 .199 .202 .205 .208 .210 .213 .215
		180 185 190	18.730 20.330 22.030	180 185 190	.36390 .39180 .42140	550 575 600	.219 .222 .223

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The le	gal staff evalu	iation portio	n of this me	emorandum	n has been r	edacted.		
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