



CON: 12-15
Doc # 19029

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

21 OCT 2005

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
Article No. 7004 2510 0006 9723 9517

Dick Westcott
Owner
Amazing Products Company
1511 S. Garfield Place
Mason City, IA 50401

Dear Mr. Westcott:

RE: Amazing Products Company
Mason City, Iowa
RCRA ID No.: none

On June 28-29, 2005, a representative of the U. S. Environmental Protection Agency (EPA) investigated your facility. The investigation was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA). A copy of that investigation report is enclosed. If there are any questions regarding this letter, please contact me at (913) 551-7164.

Sincerely,

Deborah Finger
Compliance Officer
RCRA Enforcement and State Programs Branch

Enclosure

cc: Cal Lundberg
IDNR



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

JUL 18 2005

MEMORANDUM

SUBJECT: RCRA Complaint Investigation at Amazing Products Company,
Mason City, IA – Non-notifier

FROM: Dedriel Newsome, Environmental Engineer *Dedriel Newsome*
ENSV/ARCM 7/13/05

THRU: Cheryl Crisler, Chief *Cheryl Crisler*
ENSV/ARCM for CC

TO: Donald Toensing, Chief
ARTD/RESP

An inspection was conducted at Amazing Products Company, in conjunction with a Resource Conservation and Recovery Act (RCRA) complaint investigation conducted at Alexander Technologies USA Inc. (AT-USA) on June 28 and 29, 2005 at the request of the Air, RCRA and Toxics Division (ARTD). Amazing Products is located at 1511 S. Garfield Place, Mason City, IA 50401 and the telephone number is (641) 423-2640. AT-USA is located at 1511 S. Garfield Place, Mason City, IA 50401.

Around May 2005, EPA received a complaint (complainant wanted to remain anonymous) that alleged leftover chemicals were being stored at AT-USA, both upstairs and in the basement. The complainant also alleged that mercury contaminated equipment owned by AT-USA was being stored outside at the facility and maybe causing environmental contamination due to runoff. The complainant stated that this equipment was used in the past to make mercury oxide batteries at 1580 SW 15th Street, which is located directly across the street.

To provide some background information, Alexander Technologies, Inc. (ATI) started at 1511 S. Garfield Place in 1967. According to the EPA June 10 and 11, 1997 RCRA inspection report, ATI manufactured rechargeable battery packs. In April 2002, ATI merged with another company and formed Lexstar Technologies, Inc., Mason City, Iowa. The merger failed and the bank foreclosed on the company's assets in December 2003. The assets were sold at a public auction on January 16, 2004. Casey Holdings Limited, a United Kingdom (UK) corporation, purchased the assets. Casey Holdings Limited then created a new company, AT-USA, at this site effective January 16, 2004. In general, they still conduct the same types of operations as Lexstar, but on a smaller scale.

Also, Amazing Products Company was a tenant in the east basement at the time of purchase. Amazing Products conducts injection molding, has four employees, and has been owned by Dick Westcott for about three years.

Also, in the past ATI owned the facility across the street at 1580 SW 15th Street. An EPA inspection was conducted there on March 1, 2000. According to that report, the facility started around 1984, manufactured mercury oxide dry battery cells, and had one 20,000 square foot building with three employees that operated 15 days a month at this facility and 15 days at the ATI facility across the street. The facility was determined to be a CESQG of D009 waste and a universal waste destination facility for batteries. As stated above, Lexstar's assets were sold at an auction on January 16, 2004 and Michael Olson purchased the 1580 SW 15th Street facility. He tried unsuccessfully to sell the building. Therefore, around April or May 2005 he moved in his construction company, Mid Continent Contracting, until he can sell the building. Part of the building is currently being used for warehousing and part of it is leased out to a headstone company.

On June 28, 2005, as part of the complaint investigation, Cindy Garza, Environmental Specialist, Iowa Department of Natural Resources (IDNR) and I visually inspected the basement that Amazing Products is leasing. We arrived at Amazing Products and met Andy Buehler, Technician (about three years at Amazing Products and 12 to 13 years at ATI). I introduced myself and explained the purpose of the investigation. He stated that Dick Westcott was off-site and would return later that week. I asked if I could have access to the chemicals in their area belonging to AT-USA and he stated "yes." I asked if I could have someone from AT-USA accompany me and visually inspect the chemicals in storage and he agreed. I then called Trent Bollman, Alexander Technologies, Engineering Manager. He and Ed Ries, Alexander Technologies Manufacturing Engineer, joined us. Mr. Bollman, Mr. Ries, Ms. Garza and I then visually inspected the basement where their leftover chemicals were stored as discussed in the AT-USA Complaint Investigation Report.

Also, on June 28, 2005, Ms. Garza and I visually inspected the facility across the street at 1580 SW 15th Street. We met Sandy Squier, Mid-Continent Contracting Office Manager who acted as the facility representative. She identified some equipment belonging to the amazing Products owner, Dick Westcott (see photos 2 through 6). She stated that the equipment stored outside across the street at 1511 S. Garfield Place also belonged to Mr. Westcott. She stated that this equipment was located in their building until about May 2005. She stated that Mr. Westcott purchased it in an auction. She stated that Mid-Continent Contracting moved it outside because they needed the space. She stated that they had been asking Mr. Westcott to remove it, but since he did not and they needed the space, they moved it outside across the street. She also stated that they moved some outside on the north side of their facility and pushed some to the side on the lower level of their facility (see photos 2 through 6). Ms. Squier stated that she believed they moved the equipment across the street around April or May 2005, because they purchased a fork tractor on March 8, 2005, and this is what they used to move the equipment. Ms. Squier could not answer any questions relating to the past use of this equipment. Therefore, I asked her if I could return tomorrow with someone from AT-USA to answer these questions and she agreed.

On June 29, 2005, Mr. Ries accompanied Ms. Garza and me over to 1580 SW 15th Street to look at this equipment owned by Mr. Westcott and tell me if it was used in the mercury oxide battery production process. Mr. Ries identified the blue equipment as having been used in the mercury oxide battery production line. Out of all the equipment being stored inside and outside at this facility, he specifically identified only three pieces of equipment being stored inside that were used on the mercury line and could have mercury contamination (see photos 5 and 6). However, Mr. Ries and Ms. Squier stated that this equipment was clean when they observed it for the auction.

Mr. Ries also stated that he believed the equipment across the street was placed outside at 1511 S. Garfield Place in late 2004 and that the tarps were put on a couple of months later. He accompanied Ms. Garza and me to see if he could identify this equipment stored outside (see photos 7 through 17). He was not sure where all of it was specifically used in the mercury oxide battery process, but stated that it was used somewhere in the process. I observed some light grey powdery residue on three pieces of this equipment (see photos 10 and 13 through 16). I asked Mr. Ries if this was mercury oxide and he stated that he did not know and that the mercury oxide is a darker grey. I collected three samples for Ms. Garza who was accompanying me on the complaint investigation. She had them analyzed for mercury using an XRF unit. One consisted of a composite of the light grey powdery residue from three of the machines. Two consisted of soil samples from the runoff area (see photos 12 and 17). According to the results included as attachment 1, mercury was not detected at 20 ppm in the two soil samples, but was detected at an average of 182,612 ppm in the machine powdery residue. Cadmium was also detected at an average of 2108 ppm in the machine residue. Based on this, this equipment was not cleaned adequately to remove all mercury contamination. As shown by the photos, this equipment is stored unsecured outside and is not completely covered for protection. The equipment is stored on concrete that drains to the southeast to soil about 75ft away (see photo 12). Even though mercury was not detected in these soils at 20 ppm, it should be noted that it is stored on concrete with unsealed seams. Some weeds are growing in these seams (see photos 12 and 17). Therefore, any mercury that would have been washed off may have drained into the seams. It should also be noted that a creek is located about 100 ft from the area where the equipment is stored (see aerial photo in AT-USA complaint investigation report). There is also a park located northeast about several blocks from the facility including a fishing pond as shown in the aerial photos.

Mr. Westcott returned on June 29, 2005 and introduced himself while we were visually inspecting the equipment being stored outside. I introduced myself and explained the purpose of the investigation. He stated that he had a lunch appointment with a client and would return about 1:30 P.M. to talk to us. He returned and I asked him about some fluorescent bulbs I observed by the door. They were not stored securely and were located at what appeared to be a storm drain (see photo 1). He stated that these are spent bulbs that were originally stored inside and that had to be taken outside to make space available. He stated that they were going to send them to the landfill for disposal. I asked him about sending them for recycling. He was not aware that they could be recycled and asked if I had any names of facilities. I provided him with an Iowa Waste Reduction Center pamphlet to contact for assistance.

I pointed out and asked Mr. Westcott about the chemicals that were identified the previous day as belonging to AT-USA. I asked him if any of these chemicals belonged to them or if they have used any of them and he stated "no." I asked Mr. Westcott if AT-USA would have access to these chemicals in order to do the waste determinations and he stated that as long as they contact him first, they can have access to the chemicals.

I asked Mr. Westcott about the equipment being stored outside (see photos 7 through 16). He stated that all of the equipment on the north side was brought over from the building across the street and belonged to him. He stated that it was just steel. Mr. Westcott stated that the equipment was brought over about six months ago and they covered it "shortly after" it was brought over. I asked if it was placed outside at his direction and he stated "yes." I also pointed out and asked him about the grayish powdery residue on the equipment and he stated that he did not know what it was.

On 7/1/05, I contacted Mr. Westcott to inform him of IDNR's sampling results. I told him that the sample from the machine residue contained high levels of mercury. He stated that he would make sure the equipment is covered more completely. He stated that he had also contacted the Iowa Waste Reduction Center to obtain recyclers for the spent fluorescent bulbs.

As stated above, this was a complaint investigation that involved three facilities, AT-USA, Amazing Products, and Mid Continent Contracting. Separate reports were written for AT-USA and Mid Continent Contracting.

Attachments

1. IDNR Sampling Results (1 page)

Photo Log (2 pages)

Photographs (11 pages / 17 photos)

IAC-567-131
Hazardous Condition Determination
Alexander Battery
Mason City, Iowa
X-ray Fluorescence Soil Analysis
All readings in parts per million (ppm)

	Antimony (Sb)	Tin (Sn)	Cadmium (Cd)	Silver (Ag)	Strontium (Sr)	Rubidium (Rb)	Lead (Pb)	Selenium (Se)	Arsenic (As)	Mercury (Hg)	Zinc * (Zn)	Copper (Cu)	Nickel (Ni)	Cobalt (Co)	Iron (Fe)	Manganese (Mn)	Chromium (Cr)	Vanadium (V)	Titanium (Ti)	Scandium (Sc)	Calcium (Ca)	Potassium (K)
Statewide Standard	31.0	NL	39.0	390.0	47,000.0	NL	400.0	390.0	14	23.0	23,000.0	2,900.0	1,600.0	NL	NL	11,000.0	230.0	550.0	NL	NL	NL	NL
Detection Limit	75.0	75.0	50.0	50.0	25.0	15.0	20.0	15.0	15.0	20.0	75.0	125.0	100.0	200.0	250.0	250.0	20.0	100.0	520.0	NL	1,000.0	1,000.0
A.B.-01	ND	ND	25.0	ND	111.6	47.9	74.3	ND	ND	ND	161.1	ND	ND	ND	19,023.6	421.0	10.0	58.8	2,708.4	ND	38,830.3	14,293.1
	ND	ND	86.6	ND	105.5	57.7	81.3	ND	ND	ND	185.3	ND	ND	ND	20,271.7	561.8	10.0	52.7	2,516.9	ND	37,856.8	14,210.1
	ND	ND	25.0	ND	103.1	53.7	65.8	ND	ND	ND	217.3	ND	ND	ND	19,438.3	378.3	108.1	76.6	2,648.7	ND	37,970.2	14,291.0
	ND	ND	25.0	ND	126.2	56.5	62.6	ND	ND	ND	186.0	ND	ND	ND	20,402.1	326.8	57.8	54.9	2,704.1	ND	38,014.8	14,560.6
	ND	ND	25.0	ND	117.9	57.2	59.7	ND	ND	ND	181.3	ND	ND	ND	21,012.9	432.5	53.4	58.5	2,498.5	ND	37,900.4	14,151.6
Average	ND	ND	37.3	ND	112.9	54.6	68.7	ND	ND	ND	186.2	ND	ND	ND	20,029.7	424.1	47.9	60.3	2,615.3	ND	38,114.5	14,301.3
A.B.-02	4,108.6	3,537.3	1,573.1	ND	ND	ND	ND	ND	ND	149,791.3	2,102,521.8	62.5	ND	ND	304,608.8	86,779.2	ND	ND	ND	ND	4,251.4	7,115.0
	5,173.1	3,838.7	1,698.9	ND	ND	ND	ND	ND	ND	160,931.7	2,161,939.5	62.5	ND	ND	298,817.8	91,232.8	ND	ND	ND	ND	4,108.2	7,343.6
	8,654.6	5,989.0	2,704.1	ND	ND	ND	ND	ND	ND	225,794.6	2,965,195.8	62.5	ND	ND	441,717.9	110,607.2	ND	ND	ND	ND	4,104.8	6,370.2
	4,323.0	3,510.1	1,492.1	ND	ND	ND	ND	ND	ND	139,285.7	1,841,842.6	62.5	ND	ND	275,977.8	76,161.2	ND	ND	ND	ND	4,072.3	6,422.6
	8,554.3	6,688.4	3,069.9	ND	ND	ND	ND	ND	ND	237,256.0	3,271,673.5	62.5	ND	ND	476,457.0	145,243.0	ND	ND	ND	ND	4,129.3	7,023.9
Average	6,162.7	4,712.7	2,107.6	ND	ND	ND	ND	ND	ND	182,611.9	2,468,634.6	62.5	ND	ND	359,515.8	102,004.7	ND	ND	ND	ND	4,133.2	6,855.1
A.B.-03	ND	ND	ND	ND	120.6	39.0	74.0	ND	ND	ND	349.9	ND	ND	ND	14,822.8	587.5	10.0	37.4	1,789.1	ND	87,734.1	11,199.2
	ND	ND	ND	ND	118.6	41.9	94.8	ND	ND	ND	353.1	ND	ND	ND	15,978.8	328.5	49.5	46.5	1,821.2	ND	86,733.6	10,393.9
	ND	ND	ND	ND	119.1	35.3	103.4	ND	ND	ND	365.8	ND	ND	ND	15,750.8	571.3	10.0	37.0	1,844.4	ND	87,476.3	10,452.2
	ND	ND	ND	ND	111.5	40.3	92.2	ND	ND	ND	394.7	ND	ND	ND	15,044.4	310.7	39.6	43.1	1,886.5	ND	86,683.2	10,599.7
	ND	ND	ND	ND	118.4	40.1	144.0	ND	ND	ND	362.1	ND	ND	ND	15,490.2	653.1	81.8	37.2	1,847.0	ND	86,983.4	10,992.8
Average	ND	ND	ND	ND	117.6	39.3	101.7	ND	ND	ND	365.1	ND	ND	ND	15,417.4	490.2	38.2	40.2	1,837.6	ND	87,122.1	10,727.6

Statewide Standards - Soil standards from IAC-567-137, Iowa Land Recycling Program
Detection Limit - Detection limit for the NITON Model XLt 793WY X-ray Fluorescence Metal Analyzer.
NL - Metal not listed in IAC-567-337 soil standards or NITON detection limit list.
Numbers in red - Metal detected but below the reporting limit, half the detection limit was used.
ND - Metal not detected
* Zinc results unreliable due to interference.

PHOTO LOG

Facility Name / City: Amazing Products Co., Mason City, IA 50401

Facility ID #: Non-notifier

Date: June 29, 2005

Photographer: Dedriel Newsome

Type of Camera: Canon Power Shot G5, Serial #: 6521000618

Digital Recording Media: Flashcard

All digital photos were copied by: Dedriel Newsome on 7/11/05 *RAW*

All digital photos were copied to: CD-R

Original copy is stored in: CD-R Digital photos were downloaded to CD-R by Dedriel Newsome.

No changes were made in the original image files prior to storage on the CD-R. *RAW*

Report Photo#	Photographer	Date	Approx. Time	File Name (IMG_XXX.jpg)	Description
1	Dedriel Newsome	6/28/05	1:51P	0037	Amazing Products just outside entrance door – spent bulbs being stored next to apparent storm drain.
2	Dedriel Newsome	6/28/05	2:30P	0042	North side of building (facing southwest) - Various equipment belonging to Dick Westcott being stored.
3	Dedriel Newsome	6/28/05	2:31P	0043	North side of building (facing south) - Various equipment belonging to Dick Westcott being stored.
4	Dedriel Newsome	6/28/05	2:31P	0044	North side of building (facing southeast) - Various equipment belonging to Dick Westcott being stored.
5	Dedriel Newsome	6/29/05	11:18A	0045	Inside building on lower level – Equipment belonging to Dick Westcott that had been pushed aside.
6	Dedriel Newsome	6/29/05	11:19A	0046	Inside building on lower level – Equipment belonging to Dick Westcott that had been pushed aside.
7	Dedriel Newsome	6/29/05	11:53A	0047	Northeast side of facility – Equipment belonging to Dick Westcott that was used in the production of mercury oxide batteries. It was partially covered with tarps.
8	Dedriel Newsome	6/29/05	11:53A	0048	Northeast side of facility – Equipment belonging to Dick Westcott that was used in the production of mercury oxide batteries. It was partially covered with tarps.
9	Dedriel Newsome	6/29/05	11:53A	0049	Northeast side of facility – Equipment belonging to Dick Westcott that was used in the production of mercury oxide batteries. It was partially covered with tarps.
10	Dedriel Newsome	6/29/05	11:54A	0050	Northeast side of facility – Equipment belonging to Dick Westcott that was used in the production of mercury oxide batteries. It was partially covered with tarps. Residue on this machine was part of composite sample analyzed by IDNR.

11	Dedriel Newsome	6/29/05	11:54A	0051	Northeast side of facility – Equipment belonging to Dick Westcott that was used in the production of mercury oxide batteries. It was partially covered with tarps.
12	Dedriel Newsome	6/29/05	11:57A	0052	Northeast side of facility – Equipment belonging to Dick Westcott that was used in the production of mercury oxide batteries. It was partially covered with tarps. Stormwater would drain toward bottom left corner of photo. Seams also observed in concrete with some weeds growing in between.
13	Dedriel Newsome	6/29/05	12:02p	0053	Northeast side of facility – Equipment belonging to Dick Westcott that was used in the production of mercury oxide batteries. It was partially covered with tarps. Close-up of exposed light grey powdery residue in photo 54. Residue on this machine was part of composite sample analyzed by IDNR.
14	Dedriel Newsome	6/29/05	12:02p	0054	Northeast side of facility – Equipment belonging to Dick Westcott that was used in the production of mercury oxide batteries. It was partially covered with tarps. Residue on this machine was part of composite sample analyzed by IDNR.
15	Dedriel Newsome	6/29/05	12:10p	0055	Northeast side of facility – Equipment belonging to Dick Westcott that was used in the production of mercury oxide batteries. It was partially covered with tarps. Exposed light grey powdery residue observed. Residue on this machine was part of composite sample analyzed by IDNR.
16	Dedriel Newsome	6/29/05	12:10p	0056	Northeast side of facility – Equipment belonging to Dick Westcott that was used in the production of mercury oxide batteries. It was partially covered with tarps. Exposed light grey powdery residue observed on same piece of equipment shown in photo 55. Residue on this machine was part of composite sample analyzed by IDNR.
17	Dedriel Newsome	6/29/05	12:42p	0057	Northeast side of facility – Equipment belonging to Dick Westcott that was used in the production of mercury oxide batteries. It was partially covered with tarps. Stormwater would drain toward area in middle of photo. Samples collected from soil accumulated on concrete and just east of concrete.

Amazing Products Co. Photos
Mason City, IA
6/28-29/05

Photos Taken by Dedriel Newsome 



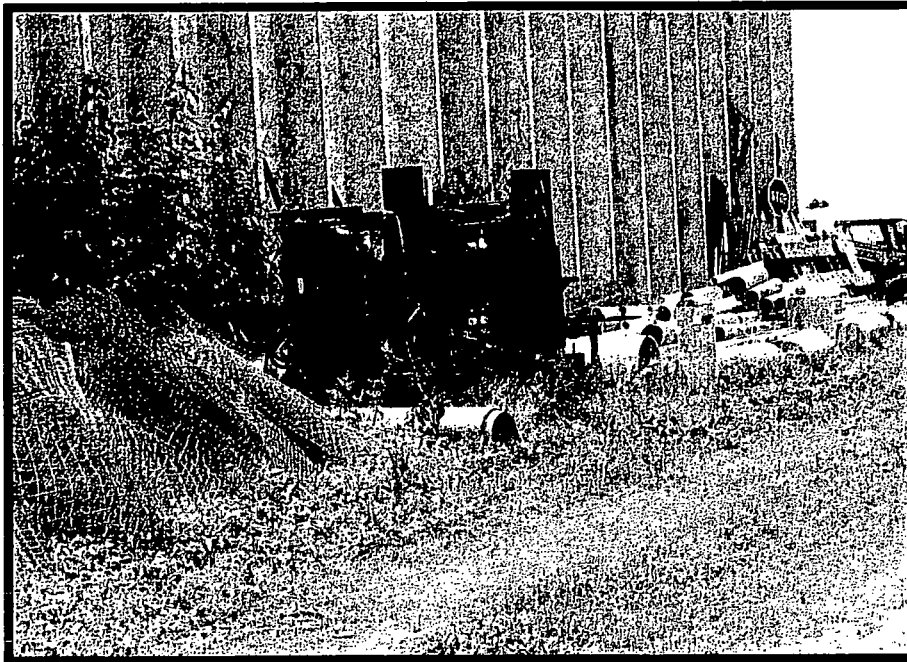
Amazing Products
Mason City, IA

6/28/05

Amazing Products just outside entrance door – spent bulbs
being stored next to apparent storm drain.

Photo 1

D. Newsome *DN*



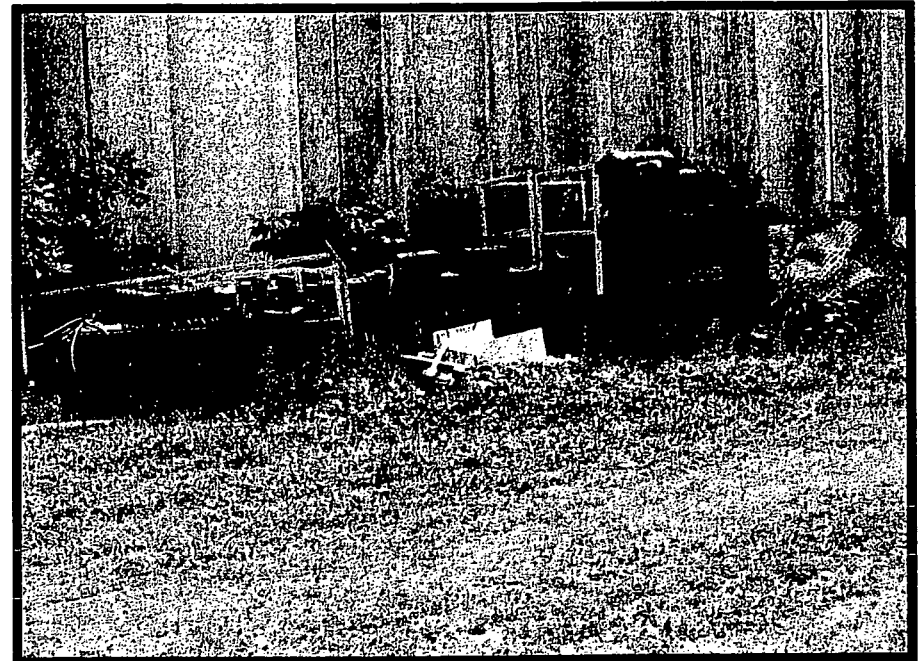
Mid Continent Contracting
Mason City, IA

6/28/05

Second Floor Room with three dust collectors – Looking at
information posted on the outside of the collectors.

Photo 2

D. Newsome *DN*



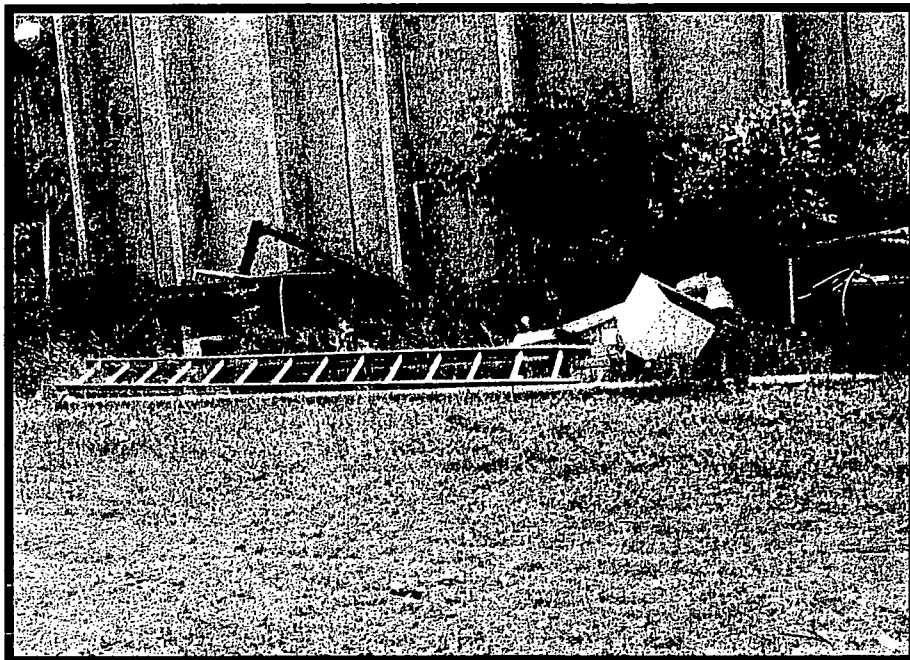
Mid Continent Contracting
Mason City, IA

6/28/05

Second Floor Room with three dust collectors – Looking at
information posted on the outside of the collectors.

Photo 3

D. Newsome *DN*



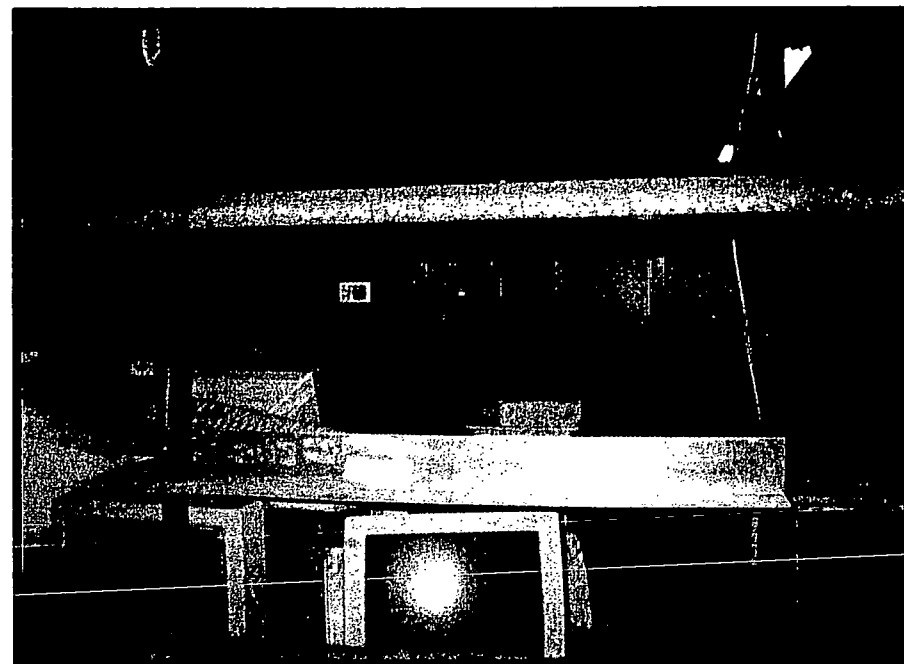
Mid Continent Contracting
Mason City, IA

6/28/05

Second Floor Room with three dust collectors – Looking at
information posted on the outside of the collectors.

Photo 4

D. Newsome *DN*



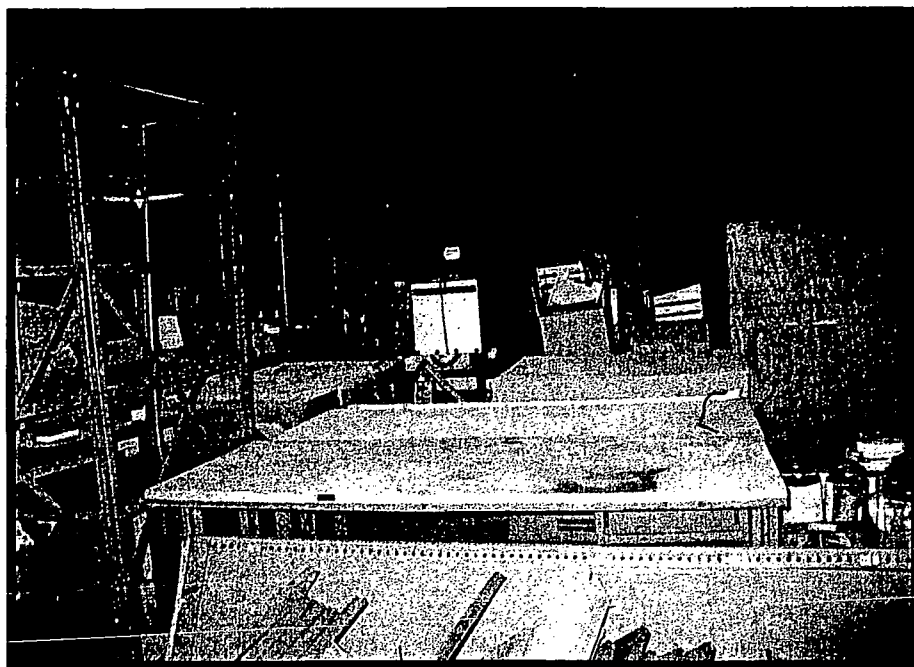
Mid Continent Contracting
Mason City, IA

6/28/05

North side of building (facing southwest) - Various
equipment belonging to Dick Westcott being stored.

Photo 5

D. Newsome *DN*



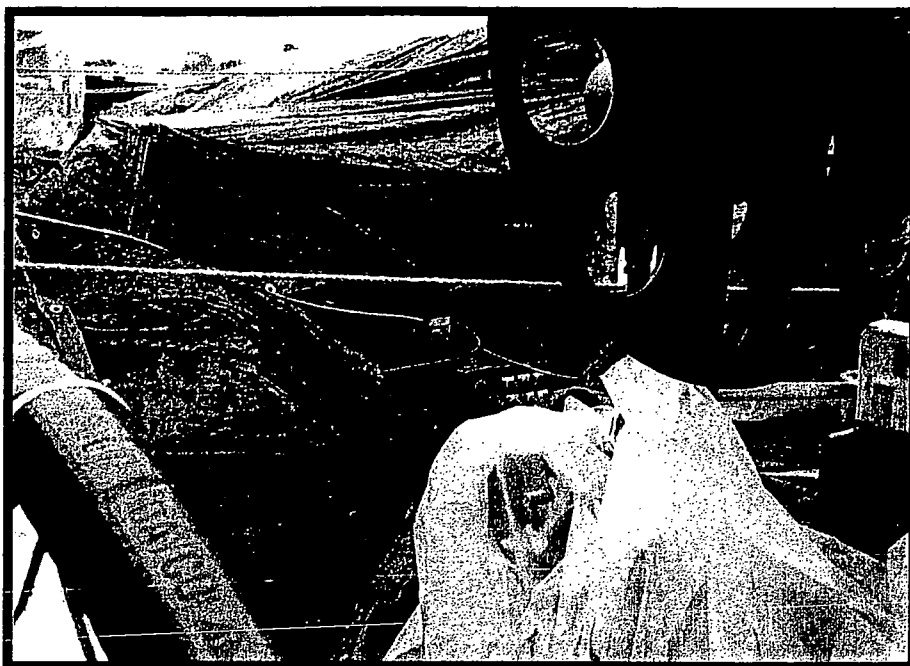
Mid Continent Contracting
Mason City, IA

6/28/05

North side of building (facing south) - Various equipment
belonging to Dick Westcott being stored.

Photo 6

D. Newsome *DN*



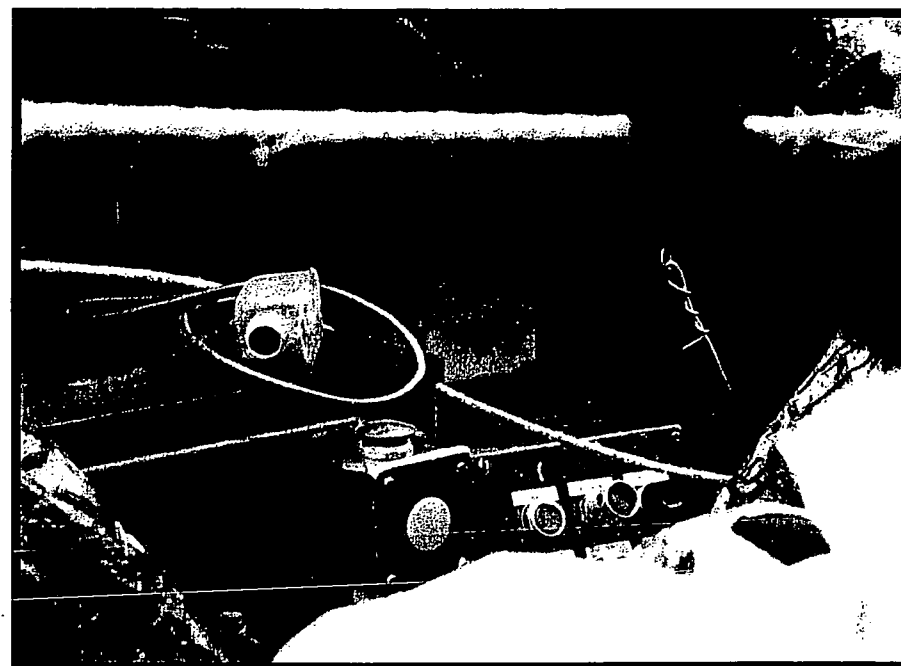
Amazing Products
Mason City, IA

6/29/05

Northeast side of facility – Equipment belonging to Dick Westcott that was used in the production of mercury oxide batteries. It was partially covered with tarps.

Photo 7

D. Newsome *DNW*



Amazing Products
Mason City, IA

6/29/05

Northeast side of facility – Equipment belonging to Dick Westcott that was used in the production of mercury oxide batteries. It was partially covered with tarps.

Photo 8

D. Newsome *DNW*



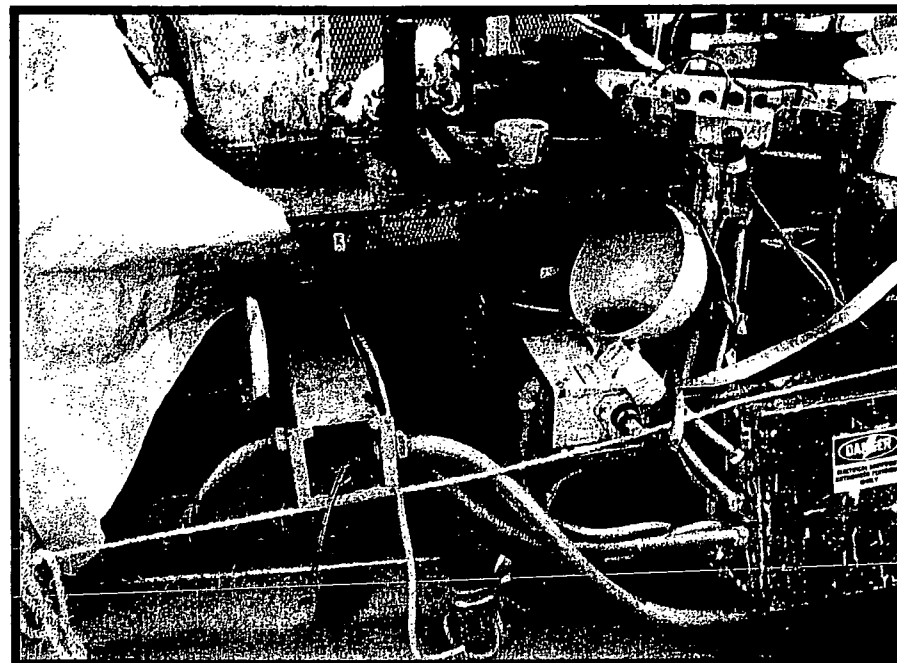
Amazing Products
Mason City, IA

6/29/05

Northeast side of facility – Equipment belonging to Dick Westcott that was used in the production of mercury oxide batteries. It was partially covered with tarps.

Photo 9

D. Newsome *DN*



Amazing Products
Mason City, IA

6/29/05

Northeast side of facility – Equipment belonging to Dick Westcott that was used in the production of mercury oxide batteries. It was partially covered with tarps. Residue on this machine was part of composite sample analyzed by IDNR.

Photo 10

D. Newsome *DN*



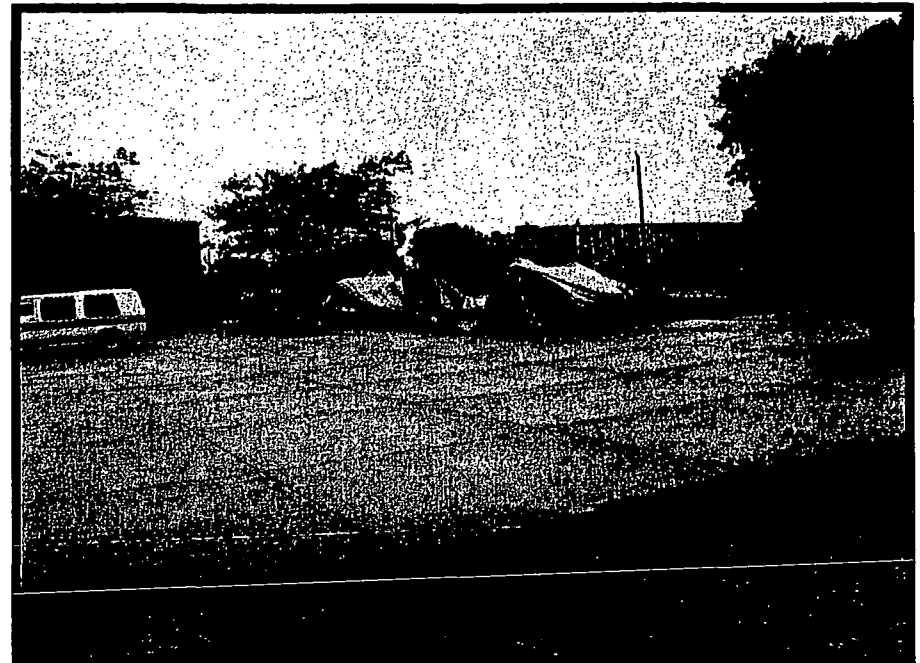
Amazing Products
Mason City, IA

6/29/05

Northeast side of facility – Equipment belonging to Dick Westcott that was used in the production of mercury oxide batteries. It was partially covered with tarps.

Photo 11

D. Newsome *DW*



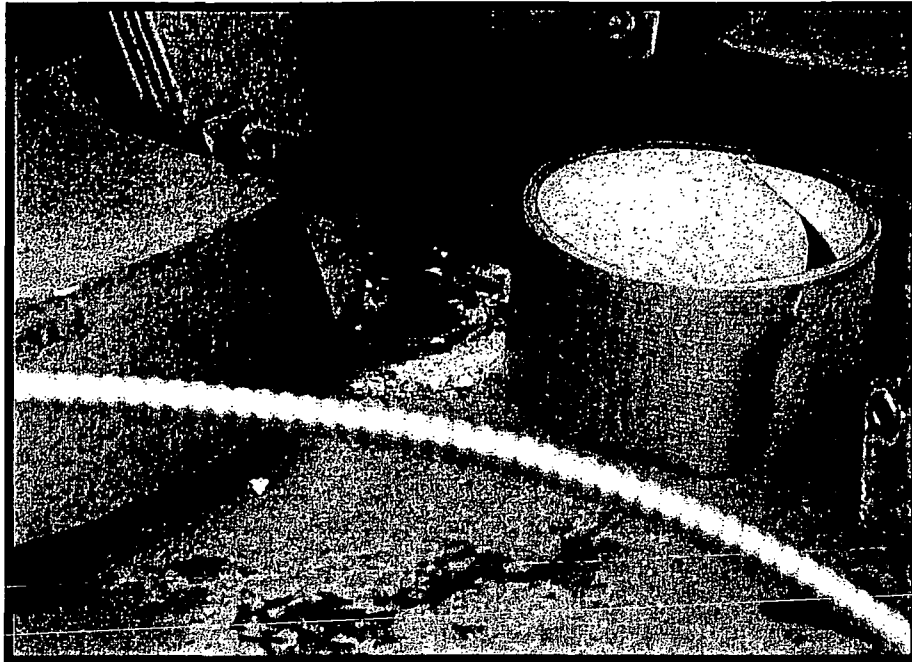
Amazing Products
Mason City, IA

6/29/05

Northeast side of facility – Equipment belonging to Dick Westcott that was used in the production of mercury oxide batteries. It was partially covered with tarps. Stormwater would drain toward bottom left corner of photo. Seams also observed in concrete with some weeds growing in between.

Photo 12

D. Newsome *DW*



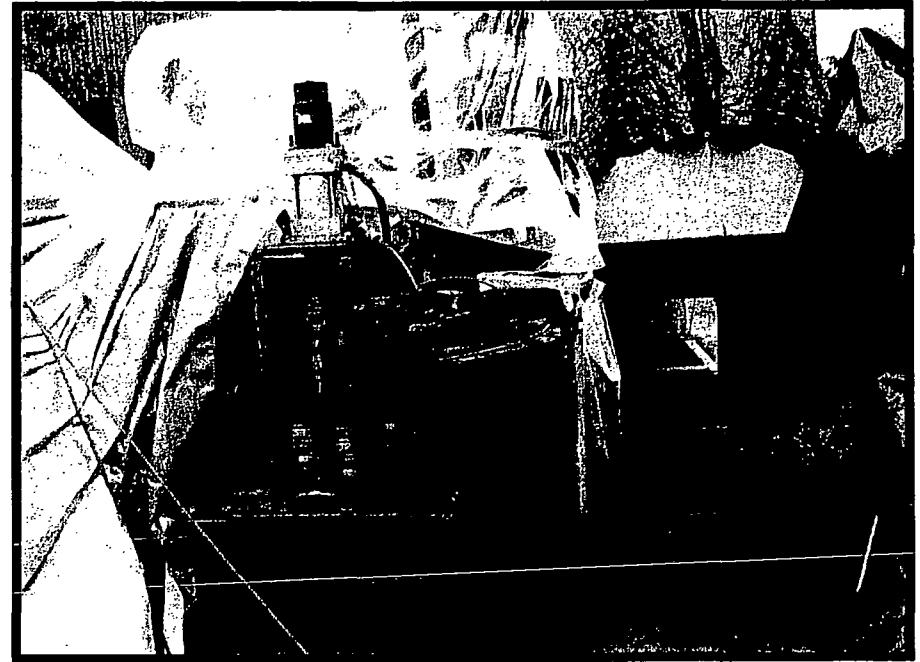
Amazing Products
Mason City, IA

6/29/05

Northeast side of facility – Equipment belonging to Dick Westcott that was used in the production of mercury oxide batteries. It was partially covered with tarps. Close-up of exposed light grey powdery residue in photo 54. Residue on this machine was part of composite sample analyzed by IDNR.

Photo 13

D. Newsome *DNU*



Amazing Products
Mason City, IA

6/29/05

Northeast side of facility – Equipment belonging to Dick Westcott that was used in the production of mercury oxide batteries. It was partially covered with tarps. Residue on this machine was part of composite sample analyzed by IDNR.

Photo 14

D. Newsome *DNU*



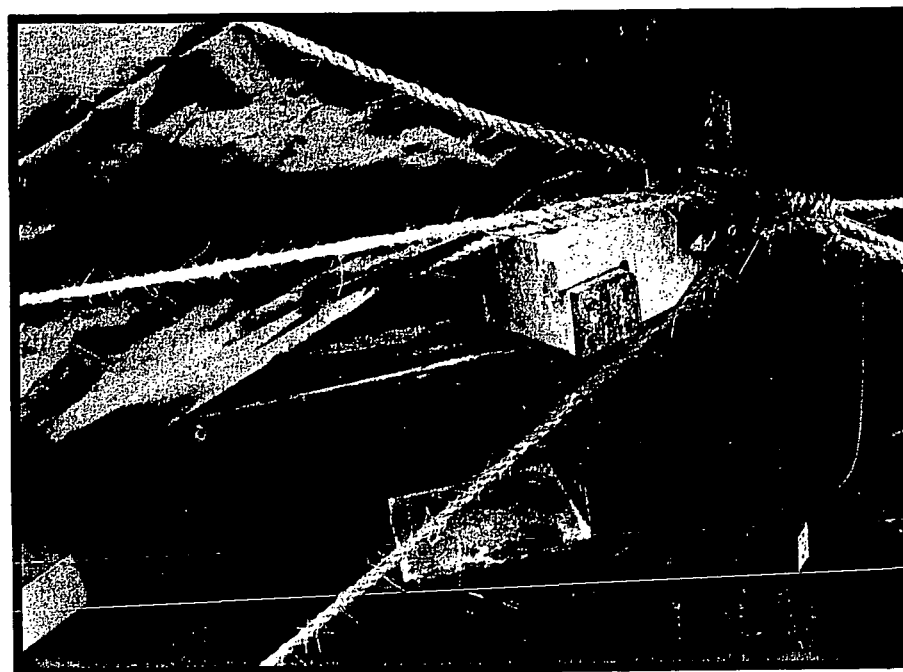
Amazing Products
Mason City, IA

6/29/05

Northeast side of facility – Equipment belonging to Dick Westcott that was used in the production of mercury oxide batteries. It was partially covered with tarps. Exposed light grey powdery residue observed. Residue on this machine was part of composite sample analyzed by IDNR.

Photo 15

D. Newsome *DN*



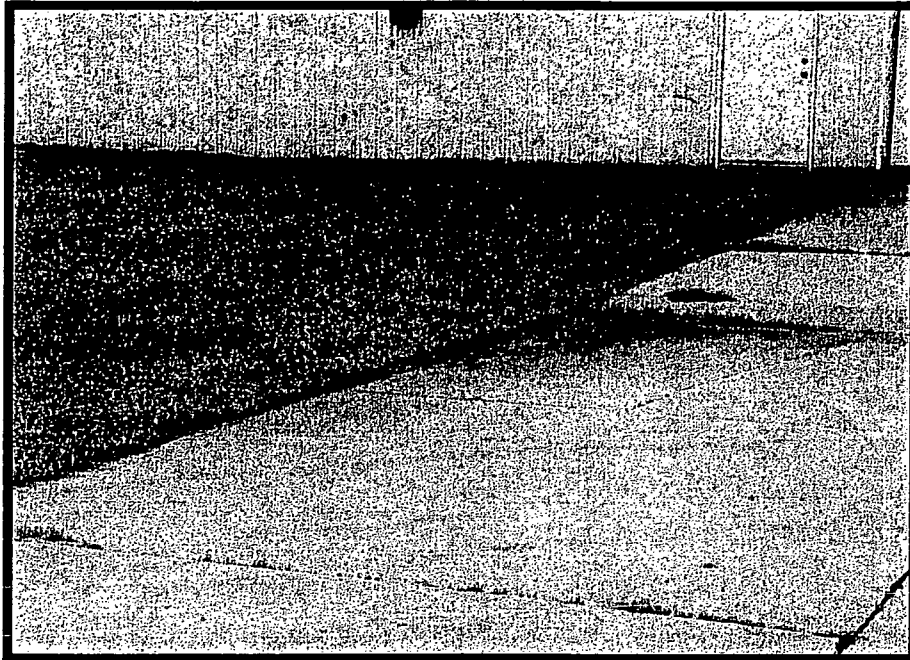
Amazing Products
Mason City, IA

6/29/05

Northeast side of facility – Equipment belonging to Dick Westcott that was used in the production of mercury oxide batteries. It was partially covered with tarps. Exposed light grey powdery residue observed on same piece of equipment shown in photo 55. Residue on this machine was part of composite sample analyzed by IDNR.

Photo 16

D. Newsome *DN*



Amazing Products

6/29/05

Mason City, IA

Northeast side of facility – Equipment belonging to Dick Westcott that was used in the production of mercury oxide batteries. It was partially covered with tarps. Stormwater would drain toward area in middle of photo. Samples collected from soil accumulated on concrete and just east of concrete.

Photo 17

D. Newsome *DN*