



August 15, 2023

Mr. Mark LeGreve  
Business Manager  
Saint Francis of Assisi Parish  
601 North 8<sup>th</sup> Street  
Manitowoc, Wisconsin 54220

**Re: Pre-Demolition Report – Universal Waste**  
Former School Building  
1416 Grand Avenue  
Manitowoc, Wisconsin 54220

Dear Mr. LeGreve,

In response to your request, Keystone Environmental LLC. (Keystone) has completed an inventory of universal waste. The assessment was performed on the three-story building located at 1416 Grand Avenue, in Manitowoc, Wisconsin. This report provides an executive summary, an outline of the scope-of-work and quantities for the materials observed.

We are pleased to be of service to you. If you have any questions, comments, or require additional services, feel free to contact us at (608) 480-8822, or by e-mail at [contact@keystone-env.com](mailto:contact@keystone-env.com).

Sincerely,

A handwritten signature in black ink that reads 'T. Ryckman'.

Tucker Ryckman  
Owner

### **1.0 Executive Summary**

Keystone was contracted to perform an inventory of universal hazardous waste prior to the demolition of the above reference structure. Keystone performed the inventory on July 12, 2023.

### **2.0 Scope of Work**

The inspection included interior and exterior observations of the subject property. Keystone also made note of the general site layout and looked for signs of existing and potential contamination sources. Site reconnaissance activities were limited to accessible areas only.

### **2.1 Mercury-Containing Equipment, Pesticides and Batteries**

Mercury-containing equipment and batteries fall under the Environmental Protection Agency's (EPA's) Universal Waste Rule (40 CFR part 273). The rule streamlines hazardous waste management standards for federally designated "universal wastes," which include batteries, pesticides, and mercury-containing equipment. The regulations govern the collection and management of these widely generated wastes, thus facilitating environmentally sound collection and proper recycling or treatment.

During the site inspection, Keystone observed mercury-containing thermostats at the subject property. The following table lists the quantity and location of mercury-containing thermostats observed by Keystone.

Location of Thermostats	Approximate Quantity
On Lower-Level Boilers	4

During the site inspection, Keystone noted the presence of several batteries throughout the facility. The batteries are associated with the emergency light systems. The following table lists the quantity and location of exit signs observed by Keystone.

Location of Exit Signs	Approximate Quantity
Lower Level	4
1 <sup>st</sup> Floor	4
2 <sup>nd</sup> Floor	6

Keystone did not observe any pesticides during its observations of the interior or exterior of the subject property

### 2.3 Hazardous Substances and Petroleum Products/Drums

Keystone did not observe any evidence of stained soil, dead vegetation, corrosion, or any other indications of improper use, storage, or disposal of hazardous substances or petroleum products at the property. During the site inspection, Keystone did not observe any totes, containers, hazardous substances, petroleum products, solid waste disposal, or unnatural fill areas on the subject property, except for several small containers of general maintenance fluids inside the boiler room/maintenance shop area.

### 2.4 Polychlorinated Biphenyls

The facility's lighting systems consist of fluorescent lights. In many cases, fluorescent light ballasts may contain labels indicating "No PCB Containing Oil." However, many light fixtures contain ballasts with no information on whether or not they contain PCB-containing oil.

Therefore, during demolition, unless the ballasts are labeled as "No PCB Containing Oil," the fluorescent light ballasts should be treated as PCB-containing equipment and disposed of off-site at a proper disposal facility. The following table lists the quantity and location of fluorescent lights and ballasts observed by Keystone.

Location of Fluorescent Bulbs	Approximate Quantity of Bulbs/Ballasts
Lower Level	276 bulbs/138 ballasts
1 <sup>st</sup> Floor	476 bulbs/238 ballasts
2 <sup>nd</sup> Floor	128 bulbs/64 ballasts

### 2.5 Additional Hazardous Material


During the site inspection, Keystone noted additional types of hazardous material that should be removed from the subject property prior to the demolition activities. The following table lists the type of material, approximate quantity, and location of the material.

Description of Material	Approximate Quantity
Fire Extinguishers	6
Refrigerators	4 (including large walk-in on lower-level)
Drinking Fountains	4
Emergency Lights	13

If you have any questions, comments, or require additional services, feel free to contact us at (608) 480-8822, or by e-mail at [contact@keystone-env.com](mailto:contact@keystone-env.com).

Sincerely,

Keystone Environmental LLC.



Tucker Ryckman  
Owner