

Section 2

**Regulatory History of the
Bannister Federal Complex**

2.0	REGULATORY HISTORY	2-1
2.1	Environmental Programs of Significant Impact.....	2-1
2.1.1	Clean Air Act (CAA)	2-1
2.1.2	Clean Water Act (CWA).....	2-2
2.1.3	Resource Conservations and Recovery Act (RCRA).....	2-3
2.1.4	Other Regulations	2-3
2.1.4.1	The Toxic Substances Control Act	2-3
2.1.4.2	Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA).....	2-3
2.1.4.3	Federal Facilities Compliance Act (FFCA)	2-3
2.1.4.4	Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) / Superfund Amendments and Reauthorization Act (SARA)	2-4
2.1.4.5	National Environmental Policy Act (NEPA)	2-4
2.1.4.6	Migratory Bird Treaty Act	2-4
2.1.4.7	Endangered Species Act (ESA)	2-5
2.2	FLOODPLAIN / WETLAND STATUS.....	2-5
2.2.1	Wetland Status	2-9
2.3	Monitoring Program.....	2-9
2.3.1	Sanitary Sewer	2-10
2.3.2	Industrial Wastewater	2-11
2.3.3	Groundwater Treatment Facility (GTF).....	2-11
2.4	NPDES Permit	2-11
2.5	Pesticides.....	2-12
2.5.1	Historical Review.....	2-12

2.0 REGULATORY HISTORY

2.1 Environmental Programs of Significant Impact

The manufacturing operations in DOE controlled portions of the BFC have necessitated greater regulatory control and oversight than the non-manufacturing (warehousing type) activities conducted in GSA controlled areas. As such, the narrative below is primarily applicable to DOE operations and not GSA. This narrative does not alter the ongoing requirements of both DOE and GSA to comply with any and all applicable regulations including the requirements of the Missouri Hazardous Waste Management Facility Permit (Permit). The BFC, comprised of DOE and GSA owned portions, is subject to the jurisdiction of the Permit Part I and the EPA Hazardous and Solid Waste Amendments Part II Permit as a result of a Class 3 Permit modification approved on August 24, 2012. The narrative below is provided only to show the reader the primary regulations covering BFC operations since the 1970's.

The three environmental laws and corresponding regulations that have the greatest impact to the BFC are the Clean Air Act (CAA) the Clean Water Act (CWA) and the Resource Conservation and Recovery Act (RCRA).

A brief description of these regulations and their impact to the BFC is provided below. It should be noted that it is the Resource Conservation and Recovery Act (RCRA) and the Missouri Hazardous Waste Management Law that together constitute the regulatory driver for all environmental cleanup at the BFC. The other environmental laws and regulations described below are provided to show the reader that the BFC is regulated under a number of different environmental requirements. These requirements are as follows:

2.1.1 Clean Air Act (CAA)

The Clean Air Act (CAA) regulates emissions to the air from the facility. It provides ambient air quality standards for criteria pollutants, emission limits and/or control technology standards for hazardous air pollutants and new sources. It also encompasses construction permitting rules, stratospheric ozone protection regulations, Section 112(r) emergency air source release rules and Title V operating permit requirements. Under the CAA, states or local governments may administer and enforce CAA provisions by obtaining EPA approval of a State Implementation Plan. MDNR administers the CAA program for the BFC.

Air pollution emissions from the KCP are predominantly the result of the West Boilerhouse operations, through the emission of nitrogen oxides (NO_x) and carbon monoxide (CO). Natural gas is the primary fuel for the West Boilerhouse; but historically, gas curtailments imposed by the local utility, boiler testing, training, and/or recalibration have required the occasional use of #2 diesel fuel as an alternate fuel. Number 6 diesel fuel was also used in the early years of operation.

Figures 2.1 and 2.2 depict nitrogen oxides (NO_x) and carbon monoxide (CO) reductions after the installation of new boilers in 2002/ 2003 at the West Boilerhouse. The new boilers were designed and built with low NO_x burners and flue gas recirculation, specifically to reduce emissions of NO_x and CO.

The boilers are subject to the New Source Performance Standard (NSPS) at 40 CFR, Subpart Dc. The filament winding operation at the site is subject to NSPS 40 CFR, Subpart VVV.

Activities subject to National Emission Standards for Hazardous Air Pollutants (NESHAP) include asbestos abatement activities, Halogenated Solvent Cleaning (40 CFR Part 63 Subpart T), Radionuclide Sources Other Than Radon From DOE Facilities (40 CFR Part 61 Subpart H), Flexible Polyurethane Foam Manufacturing (40 CFR Part 63 Subpart III), Miscellaneous Organic Chemical Manufacturing (40 CFR Part 61 Subpart FFFF), and Surface Coating of Miscellaneous Metal Parts and Products (40 CFR Part 61 Subpart MMMM). Asbestos abatement may occur in conjunction with plant maintenance and construction. A subcontractor performs these abatement activities in accordance with the applicable NESHAP, Toxic Substances Control Act (TSCA), and Occupational Safety and Health Administration (OSHA) regulations. A degreaser at the facility is subject to 40 CFR Part 63 Subpart T.

Upon completion of the move of KCP operations to the National Security Campus (NSC), on Botts Road in Kansas City, all regulated industrial air emission sources associated with KCP production operations will have been removed from the facility with the exception of the high pressure steam boilers at the West Boilerhouse.

2.1.2 Clean Water Act (CWA)

The Clean Water Act (CWA) established the National Pollutant Discharge Elimination System (NPDES), designed to control pollutants discharged to surface waters. Effluent limitations are set by regulatory agencies and permits are required for discharges from a point source into surface waters (direct discharge). The CWA also establishes effluent limitations for indirect discharges (discharge to a sanitary sewer system) from certain sources. The KCP must maintain permits for both direct and indirect discharges from the facility. The DOE controls CWA permits covering the entire BFC.

The KCP CWA permit monitoring program includes regular monitoring of plant stormwater discharges to surface water receiving streams (Blue River and Indian Creek) and sanitary / industrial wastewater discharges to the KCMO Publicly Owned Treatment Works (POTW). BFC monitoring locations are shown in Figure 2.3. Surface water effluent, receiving stream, and sanitary / industrial sewer effluent monitoring locations are discussed in more detail in Section 6.

2.1.3 Resource Conservations and Recovery Act (RCRA)

Since 1980 EPA has developed a comprehensive program to ensure that waste defined by regulation as hazardous waste is managed safely: from the moment it is generated; while it is transported, treated, or stored; until the moment it is finally disposed (from cradle to grave). The intent of the program is for states to establish their own hazardous waste program patterned off of the Federal RCRA program. Missouri received authorization to administer its own hazardous waste program in 1985. Additional authority was granted by EPA in 1999 for Missouri to administer their own clean-up program under their hazardous waste program formally known as the Missouri Hazardous Waste Management Law. Environmental clean-up activities under hazardous waste programs whether they be Federal or State administered are called Corrective Action Programs (Clean-up = Corrective Action).

The KCP submitted its first RCRA notification of regulated waste activity on August 18, 1980. A RCRA Part A permit application was first submitted on November 17, 1980 for the storage of hazardous waste in containers and tanks and to treat hazardous waste in surface impoundments. The KCP historically managed two surface impoundments called the North and South Lagoons the locations of which are shown in Figure 2.4.

The Resource Conservation and Recovery Act (RCRA) has been the regulatory driver for the environmental clean-up performed at the BFC. Environmental activities under state and federal hazardous waste laws are discussed further in Section 4.

2.1.4 Other Regulations

2.1.4.1 The Toxic Substances Control Act

The Toxic Substances Control Act of 1976 provides EPA with authority to require testing of chemical substances, both new and old, entering the environment and to regulate them where necessary. TSCA also regulates the use and storage of PCBs. Transformers and other identified electrical equipment have been drained and removed from the KCP. The KCP's primary involvement with TSCA relates to the implementation of clean up and management of areas of the facility contaminated with PCBs. This issue is discussed in greater detail in Sections 5 and 6.

2.1.4.2 Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)

The Federal Insecticide, Fungicide, and Rodenticide Act restricts the application of pesticides and herbicides through a state-administered certification program. Both GSA and the KCP comply with FIFRA. For example the KCP contracts out all applications of pesticides to certified pest control firms.

2.1.4.3 Federal Facilities Compliance Act (FFCA)

The KCP generates small volumes of waste acid. The acid is neutralized as part of the manufacturing process in order to maintain the KCP's zero inventory of mixed waste. The facility generates small quantities of absolute ethanol with an extremely small amount of depleted uranium. This mixed waste is shipped off-site for treatment.

The KCP and the state of Missouri have a contingency agreement in the event mixed waste is generated which cannot be managed within the regulatory storage limits. Implementation of this agreement has not occurred.

2.1.4.4 Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) / Superfund Amendments and Reauthorization Act (SARA)

The KCP complies with the provisions of SARA by completing the Emergency Planning and Community Right-to-Know, SARA Sections 311, 312 inventory reports, and the Toxic Release Inventory, SARA Section 313 report. Federal facilities became subject to the SARA program after the program was already in place being subject to §§ 311 and 312 in 1990 and added to Form R (Section 313) reporting requirements for the 1994 reporting year.

The only other historical activity related to CERCLA at the KCP was a September 30, 1985, Federal Facility Compliance Agreement (FFCA) between EPA Region VII and DOE pursuant to CERCLA to authorize DOE to remove contaminated sediment and soil from the North Lagoon. This is discussed in greater detail in Section 4.

2.1.4.5 National Environmental Policy Act (NEPA)

The National Environmental Policy Act (NEPA) of 1969 requires Federal Agencies to consider the environmental consequences of proposed projects and their alternatives before decisions are made. There are three levels of analysis depending on whether or not an undertaking could significantly affect the environment. These three levels include: categorical exclusion determination; preparation of an environmental assessment/finding of no significant impact (EA/FONSI); and preparation of an environmental impact statement (EIS). Major NEPA efforts at the BFC since promulgation include a KCP Sitewide Environmental Assessment performed in 1977 (DOE, 1977); a 1993 KCP Non-Nuclear Consolidation Environmental Assessment (DOE, 1993a); and a 1996 KCP Programmatic Environmental Impact Statement for Stockpile Stewardship and Management (DOE, 1996). Each of these addressed the environmental impact of facility operations. NEPA activities are currently being conducted to evaluate the disposition options for the BFC.

2.1.4.6 Migratory Bird Treaty Act

The original 1918 statute implemented the 1916 Convention between the United States and Great Britain (for Canada) for the protection of migratory birds. The statute established a federal prohibition, unless permitted by regulations, to pursue, hunt, take, capture, or kill any migratory bird. Included in the terms of the Convention for the protection of migratory birds is the protection of any part, nest or egg of any such bird.

Barn swallows, which are protected under the Migratory Bird Treaty Act, have been a concern for the BFC in recent years. These birds have nested at times inside buildings at the KCP creating health concerns for employees working in those areas. Plastic strip barriers have been

installed at doors into the building to discourage the birds from entering the building. These have been successful. The facility has had no other activity related to this Act.

2.1.4.7 Endangered Species Act (ESA)

As a part of the Hazardous Waste Permitting process, information on the KCP was provided to the U.S. Department of Interior for review of the facility's impact on the federally protected Bald Eagle. Upon review, it was concluded that the KCP was not likely to adversely affect the bald eagle.

To comply with Section 7 of the Endangered Species Act of 1973 (Pub. L. 93-205, as amended) and the Fish and Wildlife Coordination Act (Pub. L. 85-624 as amended), the United States Fish and Wildlife Service (FWS) and the Missouri Department of Conservation (MDC) were contacted as a part of historical NEPA actions at the KCP to provide information on threatened and endangered species that may be present at the site. As a part of these requests, the FWS identified the bald eagle as being present in the general area. However, bald eagles are not expected to be present at the BFC because the site is not close to a large water body where eagles may congregate and no critical habitat for bald eagles exists at the site. The MDC, when contacted, noted that three sensitive species or communities were historically known to occur in the area of the facility: the Western Massasagua, a Wormwood and the Great Plains Skink listed as endangered, extirpated and rare, respectively. However, the MDC stated that they were unaware that any of these continued to exist at the site. Also include is a list of flora and fauna at the site as listed in a 1977 NEPA Environmental Assessment.

A summary of the regulations discussed above as well as other regulations applicable to the BFC are provided in Table 2.1 below

2.2 FLOODPLAIN / WETLAND STATUS

The BFC was originally located within a 100-year floodplain at the confluence of Indian Creek and the Blue River. Flooding occurred on the site shortly after construction of the MMB (Building 1), and periodically thereafter. According to the September 1990 Flood Plan Environmental Assessment (EA) (DOE, 1990), a flood on April 23, 1944 was the first flood to occur after the plant was in operation. Floods of similar magnitude took place in 1951 and 1958. Floods of slightly lower levels occurred in 1945, 1947, 1950 and 1957. The highest recorded flood level at the KCP occurred in 1961 when water rose to 23.5 feet above flood stage, resulting in "extensive water damage to the existing improvements" (Figure 2.5). The 1990 report goes on to say that "with floods of varying magnitude occurring frequently after the 1961 record flood (1962, 1964, 1965, 1969, 1970, etc.), planning for a long-term flood control project began in the late 1960s."

Levee construction and other flood control measures, including a floodwall, were in place by 1973. However, federal funding limitations prevented completion of a floodwall around the

entire federal complex as planned. Years later, when additional funding was available, the project proceeded with construction specifications to increase protection of the BFC against a 500-year flood. The U.S. Army Corps of Engineers (USACE) completed the project in 1996 (Figure 2.6). A 2008 Flood Plan (Honeywell, 2008) augments the flood control/construction measures by outlining the roles, responsibilities, and mobilization actions established to protect personnel and facilities during flood events. The plan identifies standard operating procedures based on climatological indicators and high water stages, as well as recovery and restoration operations.

Table 2.1
Kansas City Plant
Environmental Regulations and Requirements

Environmental Regulation	Requirements Summary
Clean Air Act (CAA)	The CAA, enacted in 1970, provides air quality standards for criteria pollutants, control technology standards for hazardous air pollutants and new sources, a construction permit program, regulations on ozone depleting substances, 112(r) emergency release regulations, and operating permit requirements. Under the CAA, states may administer and enforce CAA provisions by obtaining EPA approval of a State Implementation Plan.
Clean Water Act (CWA)	The principle law governing the nation's surface waters is the federal Water Pollution Control Act or Clean Water Act. Originally enacted in 1948, it was significantly amended in 1972. The CWA established the National Pollutant Discharge Elimination System (NPDES), designed to control pollutants discharged to U.S. surface waters. The EPA sets effluent limitations, and permits are required for discharges from point sources.
Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) /Superfund Amendments and Reauthorization Act (SARA)	Originally enacted in 1980, CERCLA established liability, compensation, and cleanup for past hazardous waste activities and emergency response for hazardous substances released to the environment. In 1986 Congress enacted significant revisions to CERCLA through SARA. In part, the 1986 amendments increased state involvement in the program and increased the focus on human health problems posed by hazardous waste sites. SARA Title III Emergency Planning and Community Right to Know (EPCRA) requires reports on Hazardous Chemical usage and release reporting.
Toxic Substances Control Act (TSCA)	The TSCA, enacted in 1976, established procedures for the reporting, use and manufacture of new and existing chemicals. TSCA also established prohibitions of, and requirements for the manufacture, processing, distribution in commerce, use, disposal, storage, and marking of PCBs and PCB items.
Federal Insecticide, Fungicide and Rodenticide Act (FIFRA)	The FIFRA, originally enacted in 1947, restricts the application of pesticides and herbicides through a state-administered certification program.
Resource Conservation and Recovery Act (RCRA)	The RCRA, enacted in 1976, governs the generation, storage, handling, treatment, and disposal of hazardous waste. Cleanup of environmental contamination from solid waste management units (SWMUs) is also covered along with groundwater monitoring requirements.
Federal Facilities Compliance Act (FFCA)	The FFCA mandates compliance with RCRA by Federally owned facilities.
Pollution Prevention Act (PPA)	The PPA of 1990 establishes the federal government's priority for source reduction followed by recycling rather than treatment or disposal of waste

Environmental Regulation	Requirements Summary
	or pollutants.
National Environmental Policy Act (NEPA)	The NEPA, enacted in 1969, is a Federal policy, which requires the consideration of environmental impacts prior to decision making.
Endangered Species Act (ESA)	The ESA, enacted in 1973, regulates human and industrial activities to protect the continued existence of listed species and ensure no destruction or adverse changes occur to critical habitat.
Migratory Bird Treaty Act	This statute establishes a Federal prohibition, unless permitted by regulations, to protect migratory birds or any part, nest or egg of any such bird.
Executive Order 11988-Floodplain Management	EO 11988 was established to avoid impacts caused by occupancy or modification of floodplains.
Executive Order 11990-Protection of Wetlands	EO 11990 was established to mitigate adverse impacts to wetlands caused by destruction and modification of wetlands, and to avoid construction in wetlands wherever possible.
Executive Order 13423 Strengthening Federal Environmental, Energy, and Transportation Management	This order sets goals in the areas of energy efficiency, acquisition, renewable energy, toxics reductions, recycling, renewable energy, sustainable buildings, electronics stewardship, fleets, and water conservation.
National Historic Preservation Act (NHPA)	The NHPA, enacted in 1966, requires protection of archeological or historical properties of significance.

In a letter dated September 8, 1999, the Federal Emergency Management Agency (FEMA) documented their review of a request to revise the effective Flood Insurance Rate Map (FIRM) for the BFC. This letter, effectively revised the floodplain status of the complex noting the levee/floodwall system as being designed to provide protection from a flood having a 0.2 percent chance of being equaled or exceeded in any given year. The levee and floodwall system requires proper maintenance and operation to ensure the system functions as designed.

2.2.1 Wetland Status

In 2009 a Wetland Delineation Report was completed for the DOE owned portions of the BFC. The report concluded that only two non-jurisdictional ephemeral streams and no wetlands were present within the Survey area. The Delineation Report was submitted on December 17, 2009 to the Kansas City District of the USACE requesting a jurisdictional determination for the surveyed area. On January 22, 2010 the USACE provided a response to this request with an approved jurisdictional determination, in effect, agreeing with the initial determination that only non-jurisdictional streams existed at the facility. The consultants Jurisdictional Determination report and the USACE's Jurisdictional Determination are included as Appendices to this Section. A similar determination for GSA owned areas will be conducted as a part of NEPA activities to be conducted once GSA has confirmed that a move off-site to a new location will occur.

2.3 Monitoring Program

The MDNR, EPA and the City of Kansas City Missouri enforce applicable permit and regulatory requirements and provide guidance and direction to the BFC regarding monitoring standards and reportable actions. Environmental monitoring programs at the KCP are identified in Table 2.3.

Sanitary and industrial wastewater from the BFC is discharged to the KCMO POTW (i.e., the sanitary sewer). Effluents discharged from the plant to the POTW are regulated by a discharge permit enforced by the City of Kansas City, Missouri, Water and Pollution Control Department. This permit incorporates U.S. EPA Pretreatment Standards for the Metal-Finishing Category (40 CFR 433.17) and city ordinances. Industrial wastewater from manufacturing operations at the KCP is routed to an on-site Industrial Wastewater Pretreatment Facility (IWPF) (Figure 2.7) for pretreatment in compliance with Metal Finishing Standards prior to discharging to the KCMO POTW.

Water quality in Indian Creek and the Blue River, the two water bodies surrounding the facility, is monitored at six sites (Figure 2.3). Two monitoring sites, one on Indian Creek and one on the Blue River, are located upstream of plant outfalls. Additional monitoring points are located downstream of each plant outfall and at the confluence of Indian Creek and the Blue River. These sites are monitored for all parameters monitored in the outfalls.

**Table 2.3
Kansas City Plant Environmental Monitoring Programs**

Monitoring Program	Purpose
Stormwater Outfalls	Ensures that effluents discharging to surface waters via four plant outfalls meet NPDES permit requirements.
Stream Monitoring	Assesses impact of effluents and contaminated groundwater plumes on surface waters.
Industrial Wastewater	Provides data relating to compliance with metal finishing standards and discharge of industrial wastewater to the combined sanitary sewer system.
Combined Sanitary Sewer	To ensure that effluent, which includes discharge from the industrial wastewater system, meets KCMO ordinance for sanitary and pretreatment standards for industrial wastes and to comply with the sanitary discharge permit.
Groundwater Treatment System Discharge, Groundwater Monitoring/Pumping Wells	To ensure that treated effluent discharging to the facility sanitary sewer system meets permit requirements. Monitoring/Pumping Wells are sampled to comply with the Missouri Hazardous Waste Management Facility Permit.
Air Source	To ensure that air emissions from facility sources meet City, State, and Federal standards.
Soil	Subsurface soil is sampled as part of the RCRA corrective action program to assess impacts of historic releases and to pre-characterize wastes from construction projects.

Water quality in Indian Creek and the Blue River is highly variable because of contamination introduced upstream of the BFC by discharges from several POTWs and by general urban runoff.

2.3.1 Sanitary Sewer

A Wastewater Discharge Permit enforced by the city of KCMO regulates sanitary and industrial wastewater discharges. This permit was reissued on July 19, 2004, to the Department of Energy. Permit limits are enforced for the Groundwater Treatment Facility (GTF), the Industrial Wastewater Pretreatment Facility (IWPF), the Industrial Wastewater Reverse Osmosis (IWRO) treatment system, Cyanide Treatment System (CTS), and the total facility discharge. Regulated discharges to the sanitary sewer are in routine compliance with all permit limits. GSA discharges are not regulated as they are limited to office and warehousing activities. GSA sanitary flows are combined with that of the KCP.

The BFC discharges to the KCMO POTW include untreated sanitary sewage, treated industrial wastewater effluent from the IWPF, IWRO, CTS, and wastewater from the GTF. Regulatory

compliance for each of the above systems is monitored at the effluent discharge point for each treatment unit. The point where all these flows join is identified as the Combined Sanitary Sewer (CSS) sampling location (Figure 2.3). The IWPF, IWRO, and CTS treat metal finishing byproduct wastewater prior to discharging to the sanitary sewer system.

2.3.2 Industrial Wastewater

The IWPF treats all process related wastewater generated by production operations at the KCP. In addition, a portion of the dilute industrial wastewater is routed for treatment at the IWRO and recycled as cooling tower make-up water. Recycling treated industrial wastewater as cooling tower make-up avoids the use of potable water and the discharge of wastewater to the POTW. Water treated at the IWPF and the IWRO is regulated by the city sanitary sewer discharge permit under the Metal Finishing Pretreatment category (40 CFR 433).

Regulations, as implemented by KCMO, require monitoring of the IWPF and IWRO for three-day periods twice each year to determine compliance with regulatory limits. The results of this monitoring are reported to KCMO in Semi Annual Reports due on January 1st and July 1st of each year in "Semiannual Reports for Significant Industrial Users." In addition to this required monitoring and reporting, the KCP monitors the CSS and the IWPF on a more frequent basis

2.3.3 Groundwater Treatment Facility (GTF)

Operation of the GTF is required under the Permit to cleanup and contain contaminated groundwater. Groundwater clean-up activities are further discussed in Sections 4 and 5.

2.4 Current NPDES Permit

Stormwater from the Bannister Federal Complex is discharged through four permitted outfalls and six unpermitted outfalls. The permitted outfalls are designated Outfalls 001, 002, 003, and 004 (Figure 2.3). The unpermitted outfalls are designated as Outfalls A – F. The permitted outfalls drain areas of the facility that are associated with industrial activity. The unpermitted outfalls are associated with parking lots and outlying areas.

The current permit is discussed in Section 5.

2.5 Pesticides

The Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) restricts the application of pesticides and herbicides through a state-administered certification program. The BFC complies with FIFRA in that it contracts out all applications of pesticides to certified pest control firms.

2.5.1 Historical Review

Historical records for the KCP were reviewed in detail back to 1972. Specifically, "Reports of Pesticide Application" forms were reviewed. These forms were filled out each time any pesticide, herbicide or other FIFRA regulated material was applied at the facility. These receipts recorded the date, location, reason for material (e.g., pesticide) application along with the type and concentration of pesticide applied. The form also included the name of the company and employee who applied the material along with a signature of the responsible KCP individual overseeing the application. Review of these forms indicates the following materials were applied.

1990's Application Contractors: All Star Pest Control, All- Pro Pest Control	1980's Application Contractors: All-Star Pest Control, Sun Pest Control, Ragan & Andrews	1970's Application Contractors: Ragan & Andrews, Ragan Exterminators, Blue Hills Nursery
Maxforce 2.15%,	Orthene 1%	Dursban 1/2 - 1%
Demon EC 0.1%	Dursban 0.5%, 1%	Diazinon, 47.5%
Dursban PT270 .1%	BP100 7%	Corn and Strychnine (Avitrol) 0.6%
Dursban LO .5%	Extraban 1%	Orthene /280 1%/1%
Commodor WP 1%	PT565 pyrethrum 1%	PT-250 1%
Termidor 0.06%	Avitrol 1%	Extra
Cyroc Whitmire 0.1%	Diazinon 1/2%	21-D
	Baygon 1%	V-1 pyrethrens
	V1-280 0.5%	Zep Trim
		Baygon 8%
		Pincep 80w
		Simazine 80%