



July 31, 2010

Mr. Steve Spurlin
On-Scene Coordinator
U.S. Environmental Protection Agency, Region 4
Ed Jones Federal Building
109 South Highland Avenue, B13
Jackson, Tennessee 38301

**Subject: Final Potentially Responsible Party Group Removal Oversight Letter Report
Biological Processors of Alabama
Decatur, Morgan County, Alabama
EPA Contract No. EP-W-05-054
TDD No. TTEMI-05-001-0119**

Dear Mr. Spurlin:

The Tetra Tech EM Inc. (Tetra Tech) Superfund Technical Assessment and Response Team (START) is submitting this letter report summarizing activities conducted at the Biological Processors of Alabama (BPA) site by the Potentially Responsible Party (PRP) Group in accordance with the consent order agreement that was signed with the U.S. Environmental Protection Agency (EPA) on December 31, 2009. PRP Group activities were conducted from March 9, 2010 through June 16, 2010. Tetra Tech START was tasked to conduct written and photographic documentation and ensure that activities were performed in accordance with the approved PRP work plan for waste removal and decontamination activities.

Appendix A provides a figure illustrating the site layout, including the current conditions of containers at the site. Appendix B provides a photographic log of activities. Appendix C contains a copy of the Tetra Tech START logbook notes. Appendix D is a table of witnesses for personnel involved in site activities.

PRP GROUP SAMPLING ACTIVITIES

On March 9 and 10, 2010, Trihydro Corporation (Trihydro), the PRP Group contractor, conducted waste disposal profile sampling of fractionation (frac) tanks remaining at the BPA site. The sampling event was initiated to obtain a thorough understanding of stratified layers of media present within the frac tanks. In addition, Clean Harbors Environmental Services, Inc. (Clean Harbors) and The Environmental Quality Company (EQ) were present to assist with sampling activities and provide laboratory analysis of the samples for disposal cost-estimation purposes.

On March 30, 2010, Trihydro conducted soil sampling at the BPA site to assess potential impacts of historical operations. A total of 12 soil borings were advanced throughout the property and soil samples were collected from various depths based on visual observations and air monitoring readings obtained using a photoionization detector. In addition, two sediment samples were collected from the drainage ditch at the eastern end of the property along Finley Island Road to assess conditions in drainage pathways leading off site. Figure 2 of Appendix A illustrates the sampling locations.

PRP GROUP REMOVAL ACTIVITIES

On April 6, 2010, Tetra Tech START met at the BPA site with representatives from Trihydro and their subcontractor, Evans Environmental Construction (EEC) to begin PRP Group removal activities.

Mr. S. Spurlin
July 31, 2010

Clean Harbors and EQ also assisted with removal, transportation, and disposal of wastes. From April 6 through June 6, 2010, the following activities were conducted:

- Remaining liquids and sludges from frac tanks were removed by Clean Harbors and EQ and transported to their respective facilities for disposal.
- Cleaned the interior of frac tanks remaining at the site; frac tanks were subsequently returned to the appropriate owner (Evergreen Tank Solutions or Baker Corporation).
- Cleaned exterior tanks, including those in the upper containment area (Special Waste Tanks 5 through 7, Heavy Oil Separator, Waste Oil Collection Tank), those in the lower containment area (Fine Oil Separators, Decant Tank, Waste Oil Tank) and other tanks at the site (Tanker T255, Treated Water Tank 3, Carbon Cell, and the Truck Wash Tank).
- Emptied and cleaned Process Area equipment, including the dissolved air floatation (DAF) unit, liquid caustic tank, filter press, sand filters, two sludge thickener tanks, and the surge tank. In addition, non-essential piping was disconnected from the equipment.
- One rolloff container of filter cake from the Process Area and three rolloff containers (non-hazardous solids) from exterior areas of the site were shipped offsite for disposal.
- Cut holes near the bottom of tanks and intentionally breached the walls of the secondary containment areas to prevent future accumulation of rainwater.
- Removed approximately 152 drums and 57 totes, which were shipped for disposal as hazardous waste.
- Labpacked and removed four pallets of chemicals, including miscellaneous paints, oils, and other products, which were disposed as hazardous waste.

During the PRP Group removal activities, Trihydro coordinated with representatives from Baker and Evergreen Tank Services for the removal of frac tanks from the site after they were emptied and cleaned. A total of approximately 36 frac tanks were removed from the site during PRP Group removal activities.

On June 6, 2010, the PRP Group removal activities were completed and personnel and equipment demobilized from the site.

If you have any questions or need additional copies of this report, please contact me at (678) 775-3113.

Sincerely,



Brian Croft
Tetra Tech START III Site Manager



Andrew F. Johnson
Tetra Tech START III Program Manager

Enclosures (4)

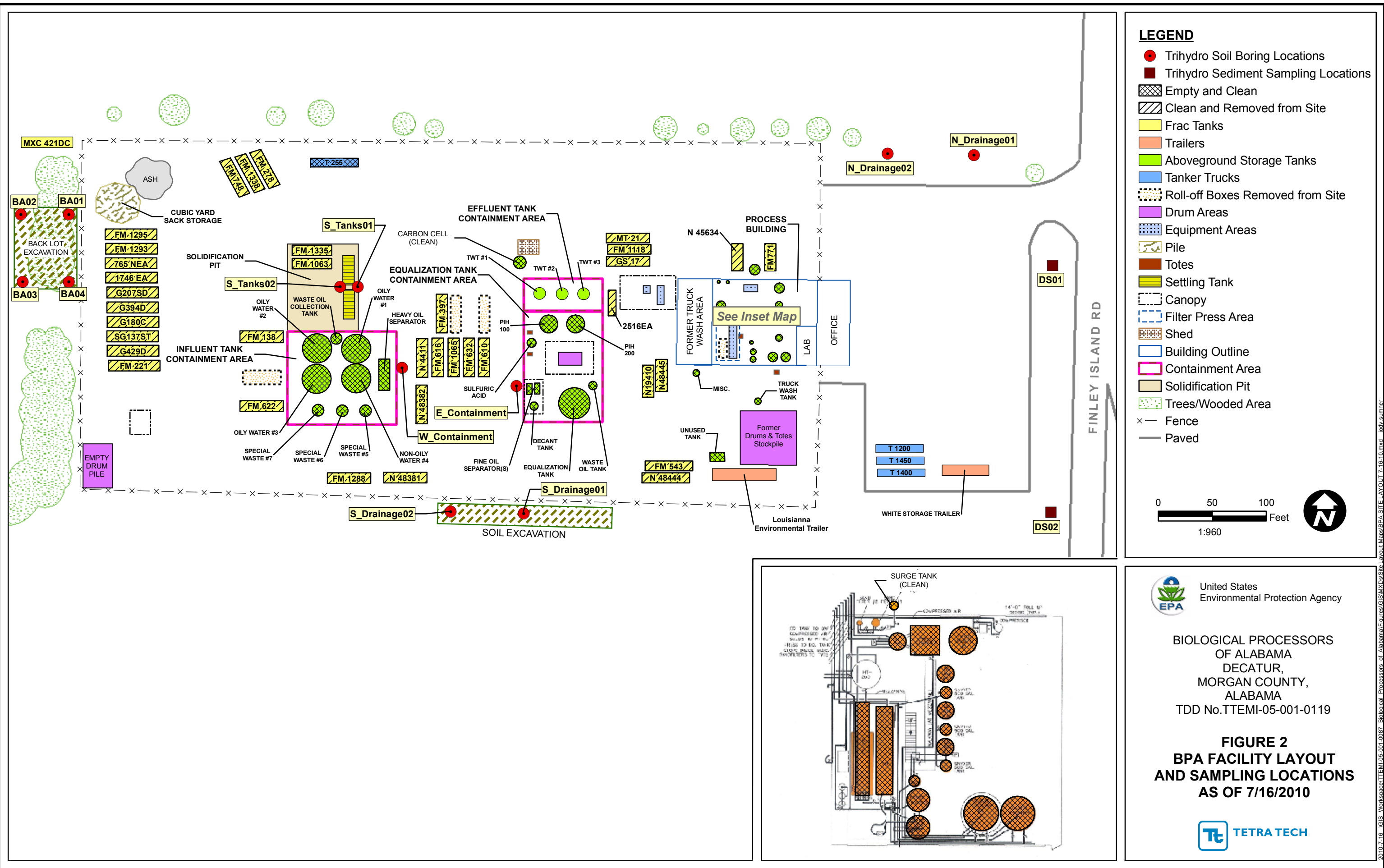
cc: Katrina Jones, EPA Project Officer
Darryl Walker, EPA Alternate Project Officer
Angel Reed, START III Document Control Coordinator



APPENDIX A

FIGURES

(Two Pages)



APPENDIX B
PHOTOGRAPHIC LOG
(16 Pages)



OFFICIAL PHOTOGRAPH NO. 1
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number: TTEMI-05-001-0119

Location: Biological Processors of Alabama

Orientation: West

Date: April 6, 2010

Photographer: Kyle Russell, Tetra Tech

Witness: Heather Barbare, Trihydro

Subject: Evans Environmental Construction cleaning frac tanks.





OFFICIAL PHOTOGRAPH NO. 2
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number:	TTEMI-05-001-0119	Location:	Biological Processors of Alabama
Orientation:	Southwest	Date:	April 7, 2010
Photographer:	Kyle Russell, Tetra Tech	Witness:	Heather Barbare, Trihydro
Subject:	Clean Harbors pumping liquids and sludges from the fractionation (frac) tanks for transportation and disposal.		





OFFICIAL PHOTOGRAPH NO. 3
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number: TTEMI-05-001-0119

Location: Biological Processors of Alabama

Orientation: Northwest

Date: April 7, 2009

Photographer: Kyle Russell, Tetra Tech

Witness: Heather Barbare, Trihydro

Subject: Section of secondary containment wall at the upper secondary containment area that was intentionally breached to prevent accumulation of rain water.





OFFICIAL PHOTOGRAPH NO. 4
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number: TTEMI-05-001-0119

Location: Biological Processors of Alabama

Orientation: South

Date: April 7, 2010

Photographer: Kyle Russell, Tetra Tech

Witness: Heather Barbare, Trihydro

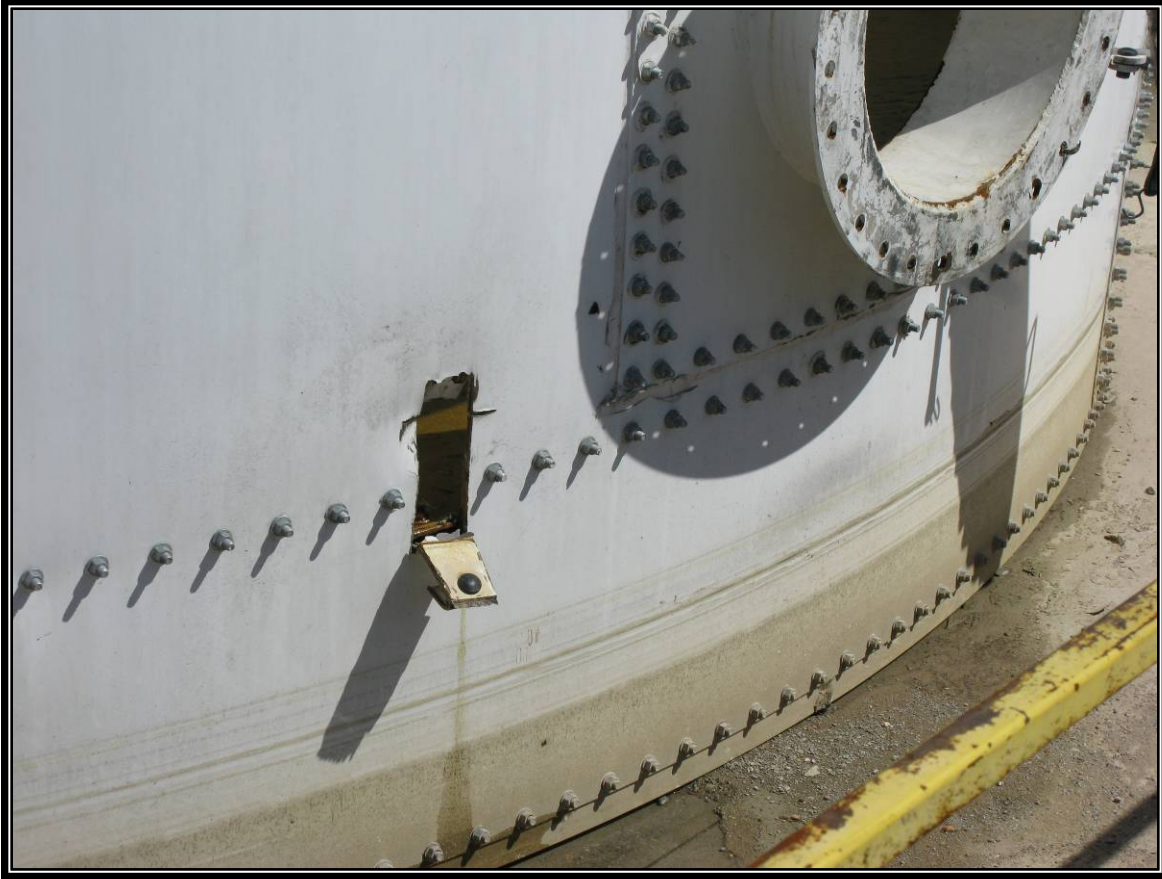
Subject: Trihydro representative collecting a sample from Treated Water Tank #3 before releasing water.



TETRA TECH EM INC

B-4

TDD No. TTEMI-05-001-0119
(Biological Processors of Alabama
Enforcement)



OFFICIAL PHOTOGRAPH NO. 5
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number: TTEMI-05-001-0119

Location: Biological Processors of Alabama

Orientation: None

Date: April 9, 2010

Photographer: Kyle Russell, Tetra Tech

Witness: Heather Barbare, Trihydro

Subject: Example of a hole that was cut into open-top exterior tanks to prevent accumulation of rainwater.





OFFICIAL PHOTOGRAPH NO. 6
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number:	TTEMI-05-001-0119	Location:	Biological Processors of Alabama
Orientation:	South	Date:	April 9, 2010
Photographer:	Kyle Russell, Tetra Tech	Witness:	Heather Barbare, Trihydro
Subject:	Evans Environmental Construction transferring materials that were removed from Tanker T255 into a 55-gallon drum.		





OFFICIAL PHOTOGRAPH NO. 7
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number: TTEMI-05-001-0119

Location: Biological Processors of Alabama

Orientation: South

Date: April 9, 2010

Photographer: Kyle Russell, Tetra Tech

Witness: None

Subject: Evans Environmental Construction cleaning the oily residue from inside the Waste Oil Collection Tank located in the upper secondary containment area.



TETRA TECH EM INC

B-7

TDD No. TTEMI-05-001-0119
(Biological Processors of Alabama
Enforcement)



OFFICIAL PHOTOGRAPH NO. 8
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number:	TTEMI-05-001-0119	Location:	Biological Processors of Alabama
Orientation:	None	Date:	April 10, 2010
Photographer:	Kyle Russell, Tetra Tech	Witness:	Heather Barbare, Trihydro
Subject:	Interior of the Liquid Caustic Tank inside the Process Area. Evans Environmental Construction cut an access hole into the tank to facilitate the removal of remaining caustic materials.		





OFFICIAL PHOTOGRAPH NO. 9
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number: TTEMI-05-001-0119

Location: Biological Processors of Alabama

Orientation: West

Date: April 10, 2010

Photographer: Kyle Russell, Tetra Tech

Witness: Heather Barbare, Trihydro

Subject: Evans Environmental Construction cleaning the Decant Tank adjacent to the Fine Oil Water Separators (1 and 2) in the lower secondary containment area.





OFFICIAL PHOTOGRAPH NO. 10
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number: TTEMI-05-001-0119

Location: Biological Processors of Alabama

Orientation: Northwest

Date: April 15, 2010

Photographer: Kyle Russell, Tetra Tech

Witness: None

Subject: Sludge box used to store some heavy sludges that had been removed from frac tanks.





OFFICIAL PHOTOGRAPH NO. 11
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number: TTEMI-05-001-0119

Location: Biological Processors of Alabama

Orientation: Southeast

Date: April 15, 2010

Photographer: Kyle Russell, Tetra Tech

Witness: None

Subject: Access hole cut into the Heavy Oil Separator located in the upper secondary containment area.





OFFICIAL PHOTOGRAPH NO. 12
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number: TTEMI-05-001-0119

Location: Biological Processors of Alabama

Orientation: None

Date: April 16, 2010

Photographer: Kyle Russell, Tetra Tech

Witness: Heather Barbare, Trihydro

Subject: Water being discharged from Treated Water Tank #3 based on laboratory analysis.





OFFICIAL PHOTOGRAPH NO. 13
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number: TTEMI-05-001-0119

Location: Biological Processors of Alabama

Orientation: South

Date: April 18, 2010

Photographer: Kyle Russell, Tetra Tech

Witness: Heather Barbare, Trihydro

Subject: Evans Environmental Construction continues cleaning frac tanks.





OFFICIAL PHOTOGRAPH NO. 14
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number: TTEMI-05-001-0119

Location: Biological Processors of Alabama

Orientation: None

Date: April 26, 2009

Photographer: James Caruthers, Tetra Tech

Witness: None

Subject: Inside of a cleaned frac tank before it was removed from the site.





OFFICIAL PHOTOGRAPH NO. 15
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number: TTEMI-05-001-0119

Location: Biological Processors of Alabama

Orientation: None

Date: April 27, 2010

Photographer: James Caruthers, Tetra Tech

Witness: None

Subject: Evans Environmental Construction cleaning the Carbon Cell.





OFFICIAL PHOTOGRAPH NO. 16
U.S. ENVIRONMENTAL PROTECTION AGENCY

TDD Number: TTEMI-05-001-0119

Location: Biological Processors of Alabama

Orientation: East

Date: April 27, 2010

Photographer: James Caruthers, Tetra Tech

Witness: None

Subject: Clean Harbors pumping totes for transportation and disposal.



APPENDIX C
LOGBOOK NOTES
(22 Sheets)



"Rite in the Rain"

ALL-WEATHER

JOURNAL

No. 390N

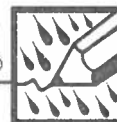
ITEM-05-001-0119

BPA Enforcement

LOGBOOK 01

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ALL-WEATHER WRITING PAPER



Name _____

Address _____

Phone _____

Project BPA REMOVAL OVERSITE
FOR PRP GROUP.

3078 COMB

This book is printed on "Rite in the Rain" All-Weather Writing Paper - A unique paper created to shed water and enhance the written image. It is widely used throughout the world for recording critical field data in all kinds of weather. For best results, use a pencil or an all-weather pen.

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3/9/10

0730 START AT OFFICE TO PICK UP EQUIPMENT.

0800 START ARRIVES AT BPA

TRI Hydro Gary Risse ONSITE

ALONG WITH RODNEY SWINNEY FROM

CLEAN HARBORS + TWO CH SAMPLERS

CLEAN HARBORS GOES OVER SAP

AND HAP

0910 CH COLLECTS SAMPLE FROM FM610

0930 CH COLLECTS SAMPLE FROM FM632

0935 CH COLLECTS SAMPLE FROM FM1065

0940 CH COLLECTS SAMPLE FROM FM616

0945 CH COLLECTS SAMPLE FROM N-4411

1000 CH COLLECTS SAMPLE FROM N4832

1000 CH COLLECTS SAMPLE FROM FM389

1005 CH COLLECTS SAMPLE FROM GS175D

1007 CH COLLECTS SAMPLE FROM FM-1118

1010 CH COLLECTS SAMPLE FROM MTR1

1030 CH COLLECTS SAMPLE FROM FM-278

1035 CH COLLECTS SAMPLE FROM FM-1338

1038 CH COLLECTS SAMPLE FROM FM 748

1040 CH COLLECTS SAMPLE FROM FM 1335

1043 CH COLLECTS SAMPLE FROM FM 1065

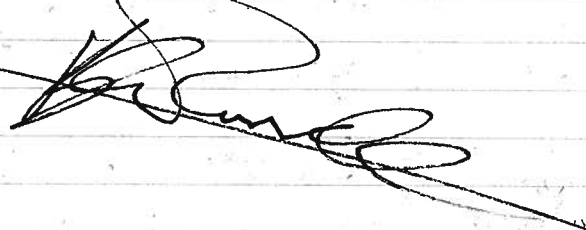
1105 CH COLLECTS SAMPLE FROM FM 1295

1113 CH COLLECTS SAMPLE FROM FM 1293

Kel Russell

3/9/10

1120 CH COLLECTS SAMPLE FROM G2075D
 1125 CH COLLECTS SAMPLE FROM SG1375T
 1130 CH COLLECTS SAMPLE FROM FM-138
 1135 CH COLLECTS SAMPLE FROM FM-622
 1150 CH COLLECTS SAMPLE FROM FM 1288
 1151 CH COLLECTS SAMPLE FROM N48881
 1201 CH COLLECTS SAMPLE FROM N48444.
 1203 CH COLLECTS SAMPLE FROM FM543
 1209 CH COLLECTS SAMPLE FROM N48445
 1212 CH COLLECTS SAMPLE FROM N19410
 1217 CH COLLECTS SAMPLE FROM BLUE
HORIZONTAL TANK, ~~FOR~~ TO LOW
TO SAMPLE.
 1232 CH COLLECTS SAMPLE FROM N45634
 1235 CH COLLECTS SAMPLE FROM FM 77
 1245 CH FINISHES COLLECTING SAMPLES
 FOR THEIR REQUIRED ANALYSIS.
 CH OFF-SITE
 1300 TRI-HYDRO HAS CONFERENCE CALL
 1350 TRI-HYDRO & START OFF-SITE
 1430 START BACK AT OFFICE




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 "People and Technology Creating a Better Environment"



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THE ENVIRONMENTAL QUALITY COMPANY

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email: steve.tinnemeier@eqonline.com

3/10/10

0700 START HEADS OUT FOR SITE
 0830 START ARRIVES ON SITE TO
 MEET TRI HYDRO + EQ. EQ WILL
 COLLECT SAMPLES TODAY FOR THEIR
 DISPOSAL PURPOSES.

EQ COLLECTED REPRESENTATIVE SAMPLES
 FROM THE FOLLOWING FRAC TANKS

FM 271	FM 133 S	FM 1288
N45634	FM 1063	N48381
MT 21	FM 129 S	N48382
FM 1118	FM 129 3	N4411
GS 17	G 207SD	FM 616
FM 278	S G 137ST	FM 357
FM 1338	FM 138	FM 1065
FM 748	FM 622	FM 632
FM 610	N48444	FM 543
N19410	N48445	

EQ REP DID SITE WALK THROUGH
 WITH TRI-HYDRO + START.

1200 EQ FINISHES COLLECTING
 SAMPLES

230 START CLOSES UP SITE START,
 TRI HYDRO + EQ LEAVE SITE

330 START BACK AT OFFICE

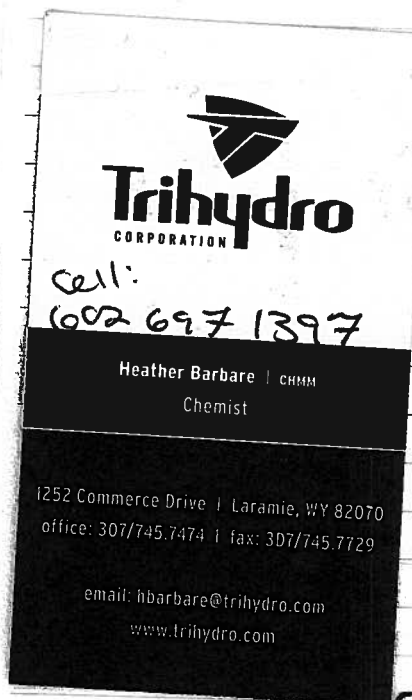
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BPA - PRP OVERSIGHT

4-6-10

015 START ARRIVES AT SITE TO MEET
 WITH GARY RISS & HEATHER BARBARE
 WHO WILL BE PROJECT MANAGER
 FOR REMAINDER OF SITE ACTIVITIES.
 CLEAN HARBORS WILL BE WASTE
 REMOVAL CONTRACTOR. EVANS ENVIRONMEN
 TAL WILL BE SUB TO TRI HYDRO.

1130 START OFF-SITE



Alabama Department of Environmental Management
 1400 Coliseum Boulevard
 Montgomery, AL 36104-2059
 (334) 271-7938 Fax: 279-3050
 mcruise@adem.state.al.us
 adem.alabama.gov

Mike Cruise
 Assessment Section, Land Division

ADEM

[Signature]

WEDS BPA-PRP OVERSIGHT 4-7-10

0800 START ON-SITE

TRI-HYDRO + EVANS EXCAVATING + ENVIRONMENTAL
CONSTRUCTION ARE ON-SITE

TODAYS FORECAST IS OVERCAST + BREEZY

TONIGHT WITH A CHANCE OF STORMS

0930 EVANS HAS BEEN WORKING ON
BACK ROW OF TANKS. CLEANING FM-2A
+ VACUUMING IT OUT. EVANS EEC IS USING
A DSR-50 SODIUM HYDROXIDE CLEANING
SOLUTION FOR THE FRAC TANKS

1030 MIKE CRUICK FROM ADEM IS ON-SITE
TO DO SITE WALK THROUGH

RODNEY GWINNEY ON-SITE WITH CLEAN
HARBORS. WILL HAVE TWO TRUCKS TODAY.

1200 LUNCH ON-SITE

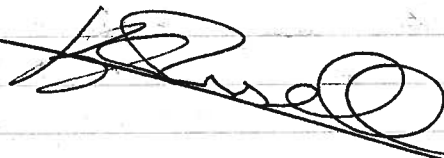
1230 BACK FROM LUNCH

1330 CH TANKERS ON-SITE.

1430 EEC KNOCKED OUT CORNERS IN BOTH
UPPER + LOWER CONTAINMENTS.

1530 EEC OFF-SITE FILLED BOTH VAC TRUCKS
UP. START OFF-SITE

1615 START ARRIVE AT OFFICE



THURS BPA-PRP OVERSIGHT 4-8-10

0600 START LEAVES FOR SITE

0730 START ARRIVES ON-SITE

TWO CLEAN HARBORS TRUCKS ARE ON-SITE
PUMPING DOWN.

TEMP 60° HIGHS IN THE 60°S CHANCE
OF THUNDERSTORMS.

OTHS RECEIVED EMAIL FROM OSC SPURLIN
WITH BAKER + ETS FRAC TANK CONTACTS

BAKER: JIMMY REGISTER-256.355.1178

ETS: CHAD KRUGER 256.318.0062

0900 EVANS IS WORKING ON CLEANING FRAC 429D
15G137ST, and G180C

0930 START NOTICED TWO EVANS EMPLOYEES
WORKING WITHOUT PROPER PPE FACEMASKS
+ HARDHATS. COLLECTED PHOTO + REPORTED
TO PM.

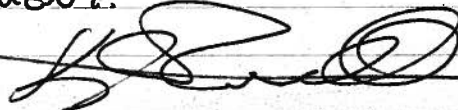
1130 CH TRUCK LOAD UP

EARLIER POST 1050 TRI-HYDRO COLLECTS
WATER SAMPLE FROM TWT#3.

1145 TRI-HYDRO COLLECTS SAMPLE FROM
CARBON VESSEL CF-100.

1200 EVANS CLEANING 394D + G2075D

1400 START OFF-SITE FOR DOCTORS
APPOINTMENT.



FRI BPA-PRP-OVERSIGHT

4/9/10

0800 START LEAVES FOR SITE

0840 START ARRIVES ON-SITE

WEATHER FORECAST: HIGHS IN 70'S WITH CLEAR SKIES.

* YESTERDAY AFTERNOON A CLEAN HARBORS TRUCK WAS PUMPING OUT OF PRAC

TANKS FM1335 & FM1063. THE TRUCK OVERFILLED AND RELEASED APPROX 20 GALS OUT TO THE GROUND.

EVANS EEC BURNED AROUND SPILL AND REMOVED IMPACTED SOIL FROM GROUND & PUT IT INTO ROLL OFF.

EVANS HAS FM221, B429D, SG1375T, G180C, & G394D CLEAN.

0930 EVANS IS WORKING ON CLEANING FM 1063 & 17466A

1115 CH TRUCK #4 OFF SITE EEC CLEANING ON FM1295 & 765NEA. EEC IS FINISHED WITH FM 1063.


1200 LUNCH ON-SITE

1230 BACK FROM LUNCH

EEC HAS CLIPPED HOLES IN OWT 1-4 THE LARGE POLY TANK IN UPPER CONTAINMENT, & THE EQ TANK IN LOWER CONTAINMENT

1550 TRUCKS 5 & 6 FROM CH ON-SITE

1630 START OFF-SITE



SAT BPA-PRP-OVERSIGHT

4/10/10

0930 START ON-SITE

RONNIE BEECHER & ROB BOYD WITH A.C.E. CAME TO SITE TO LOOK AROUND. MR BEECHER IS CONCERNED ABOUT TWO PRESSURE WASHERS ONE WHICH IS MISSING & ANOTHER IS MISSING A MOTOR. ROB BOYD IS APPARENTLY INTERESTED IN PURCHASING THE PROPERTY.

1000 EEC FINISHED CLEANING T-255 DRUM UP WASTE INTO 4 55-GALLON DRUMS

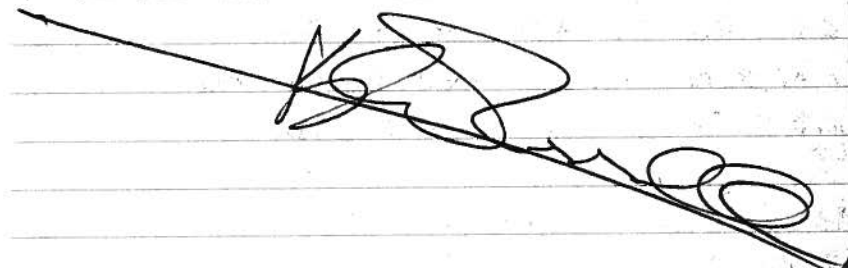
EEC MOVES ON TO CLEAN VERTICAL POLY TANK IN UPPER CONTAINMENT

1130 EEC FINISHED WITH THE VERTICAL WASTE OIL POLY, HAS MOVED ON TO THE DECANT POLY AND TWO OWS 100 & 200

1300 EEC FINISHED UP OWS 1 & 2

NOW WORKING ON CLEANING WASTE OIL TANK IN LOWER CONTAINMENT
1550 EEC FINISHING UP & SHUTTING DOWN START OFF-SITE

1630 START HOME



MON EPA-PRP OVERSIGHT 4/12/10

0730 START AT OFFICE TO PRINT OUT MAPS FOR SITE & WRITE UP WEEKLY WORK ORDERS. START ALSO WAITING FOR PACKAGE FROM DULUTH OFFICE.

180 START LEAVES OFFICE FOR SITE

1050 START ARRIVES ON-SITE. CLEAN HARBORS & EQ HAVE TAKEN 9 LOADS OFF-SITE SO FAR

EVANS EEC IS WORKING ON CLEANING 2S16EA & FM1336.

1200 LUNCH ON-SITE

1230 BACK FROM LUNCH

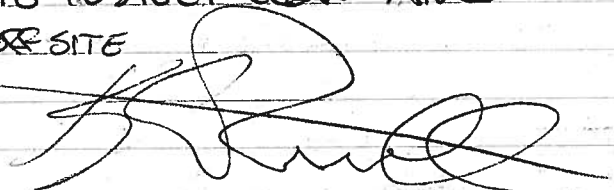
EVANS EEC JUST FINISHED CLEANING 2S16EA IS STILL WORKING ON FM1336.

1400 EEC JUST FINISHED FM1336. NOW WORKING ON FM746.

CLEAN HARBORS HAS REMOVED 8 LOADS & EQ HAS TAKEN 9 LOADS OFF-SITE.

1530 START TRIED CALLING BAKER & ETS & LEFT MESSAGES ABOUT SETTING UP A TIME FOR THEM TO COME ON SITE TO INSPECT CLEAN TANKS

1600 START OFF SITE



TUES EPA-PRP OVERSIGHT 4/13/10

0630 START HEADS TO SITE

0700 START ON-SITE EQ ON-SITE

PUMPING DOWN LOADS.

HIGH 83° TODAY CLEAR.

SO FAR 6 LOADS HAVE GONE OFF SITE TODAY

EVANS IS CLEANING G207SD & PUMPING DOWN N448445.

FM1336, FM746 ARE CLEAN.

1100 N448445 IS NOW CLEAN.

1130 LUNCH

1200 SO FAR 10 LOADS HAVE BEEN REMOVED OFF-SITE.

1300 FM1336, 278, MT21 ARE BEING PUMPED DOWN BY CH & EQ.

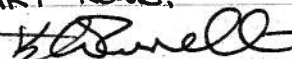
EVANS CONTINUES TO WORK ON G207SD 1400 G207SD CLEAN

TRI-HYDRO IS LOOKING FOR ADDITIONAL DATA ON DRUMMED WASTE.

1530 A TOTAL OF 14 LOADS HAVE GONE OFF SITE TODAY

1700 ~~TRIMED OFF SITE~~ EVANS OFF SITE. TWO MORE TRUCKS ARRIVE TO LOAD OUT WASTE

1800 START HOME.



WEDS BPA-PRP OVERSIGHT 4/14/10

LOGS START LEAVES FOR SITE

0700 START ON-SITE TWO TANKERS PUMPING
OUT LOADS FROM FM 1293 & FM 278

THIS MORNING

0835 CALLED BAKER. MR HAYES WILL

BE ON-SITE NEXT MONDAY.

ETS WILL BE ON-SITE LATER TODAY.

0930 ETS OFF-SITE. THERE ARE STILL
AREAS ON TANKS THAT NEED TO BE
ADDRESSED. ONLY RESIDUE, FLANGE & PIPE

AREAS NEED TO BE CLEAVED OUT.

1100 LUNCH

1130 CH & EQ ON SITE LOADING OUT
EVANS CREW IS ADDRESSING AREAS THAT

WERE NOT CLEAVED ON THE FRACS

INITIALLY.

22 LOADS TOTAL WENT OUT TODAY.

01500 START OFF SITE

01545 HOME

THURS BPA-PRP OVERSIGHT 4/15/10

0630 START OFF TO SITE

0715 START ON SITE. ONE LOAD GOING OUT
TODAY. SO FAR THIS MORNING.

0830 TWO MORE LOADS GOING OUT

FM 278 & FM 1338 WERE CLEAVED
YESTERDAY.

EVANS EEL IS WORKING ON CLEANING
FRAC FM 1288 & N4E351

EQ & CH CONT TO LOAD OUT FROM
SITE.

11-1130 LUNCH

EQ FACILITY IS NOT ACCEPTING SEVERAL
LOADS THAT ARE HIGH IN HALOGENS.

TRI-HYDRO MAY BEGIN COLLECTING
SAMPLES FROM OIL THAT GOES OFF-SITE.
15 LOADS WENT OUT TODAY.

11 FROM EQ

4 FROM CH

1720 START OFF SITE

FRI BPA-PRP OVERSIGHT 4/16/10

0730 START LEAVES FOR DECATUR

0835 START ON-SITE

EVANS CONTINUES TO PUMP OUT FRACS &
CLEAN GS17, FM1258, & N48381 WERE
CLEANED YESTERDAY.

EIGHT LOADS HAVE GONE OUT SO FAR.
FROM CH & EQ.

0845 SHIPMENT OF 55-gal DRUMS
ARRIVE ON SITE.

1030 FM-1118 HAS ABOUT 3FT OF SLUDGE
LEFT IN IT.

N45654 HAS ABOUT 4 FOOT OF SLUDGE
EVANS EEC CLEANING FM1065

1100 ACCESS HOLES RECUT INTO THE BLUE
HORIZONTAL WASTE OIL TANK

1300 A LOAD THAT CAME FROM FRAC
N48444 WAS HIGH IN PH (2).

1330 EVANS EEC RELEASED WATER FROM TWT#1

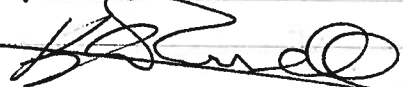
AFTER ANALYTICAL CAME IN CLEAN

HAS ADEM ON-SITE TO CHECK ON WATER
RELEASE.

1435 EVANS CLEANING ON N-4411.

1500 10 LOADS OUT TODAY.

1530 START OF SITE



MON BPA-PRP OVERSIGHT 4/19/10

0800 START ON-SITE

EVANS WAS ABLE TO CLEAN FM 1293

ON SATURDAY.

WORKING ON CLEANING N 19410 TODAY.

NO TRUCK LOADS ARE ANTICIPATED

TODAY EVANS WILL BE LOADING

UP VAC BOXES

0850 GARY RISSE FROM TRI-HYDRO

ON-SITE.

1030 STEVE SPURLIN EPA.

GROUP DOES SITE WALK THROUGH.

SPURLIN SUGGESTS MORE CLEANING

ON OWS 1 & 2.

STILL ISSUES ON WASTE STREAM
DATA.

CALLED FRAC TANKS COMPANIES

BAKER WILL BE HERE AT TWO

& ETS AT 3.

12-1215 LUNCH.

1230 CONFERENCE CALL WITH TDEC

1415 BAKER ON-SITE

BACK ROW OF BAKER TANK STILL DIRTY

TO BAKER STANDARDS. GS17

WILL GO OFF MAY TAKE 2516EA.

1500 ETS ON-SITE MOST OF THE

FRACS ARE CLEAN & READY TO
GO OFF.



Jimmy Register
Branch Manager

TANK DIVISION

684 McEntire Lane, Decatur, AL 35601
Phone (256) 355-1178 Fax (256) 355-1116
Cell (256) 214-2359
jregister@bakercorp.com www.bakercorp.com

TKI HYDRO WILL DRAFT A LETTER
TO TDEC EXPLAINING THE WASTE
WATER ISSUE
1705 START OFF-SITE

TUES BPA PRP OVERSIGHT 4/20/10

0700 START ON-SITE.

TKI HYDRO IS RUNNING SOME BENCH
TESTS ON SOME 20% CAUSTIC SOL. ON SITE
TO SEE IF THEY CAN RAISE THE PH OF
FRAC N 48444.

EVANS WILL DO A FINAL RINSE ON
N 19410 THIS MORNING. HOOKING UP TO
CAN'T PUMPING FROM FM 1118.

0800 OSC SPORLIN ON-SITE

0900 ETS ON-SITE TO RECHECK POSSIBLY
BEGIN TAKING TANKS OFF SITE.

TANKS CLEAN FM 1335, FM 748, FM 1335
FM 221, FM 1258, N 48381, N 4411
FM 1065, FM 616

0955 ETS BACK ON SITE TO START HAULING
OFF FRACS

FM-278, N 48381, FM 1258 OFF-SITE

1000 ETS ON SITE TO REMOVE MORE FRACS
FM 1335, FM 616, FM 1065

1120 ETS BACK ON SITE TO REMOVE MORE
FRACS FM 1253, FM 221, FM 748

1130-12 LUNCH

EVANS FINISHED TOUCHING UP N 19410

1430 EQ ON SITE PUMPING FROM FM 543

1610 START OFF SITE

[Signature]

WEDS BPA-PRP OVERSIGHT

4/21/10

0820 START ON-SITE

EVANS FINISHED CLEANING FM 1118

NOW WORKING ON N 45834 & FM 622

ADDED A 35 GAL CAUSTIC SOL 20% TO
FRAC N 48444 YESTERDAY TO RAISE
PH. WILL ADD ANOTHER TODAY

1200 CH ON-SITE TO DROP OFF SLUDGE BOX

TRI-HYDRO COLLECTED SAMPLE OF FILTER
CAKE FROM ROLL OFF FOR ANALYSIS

1230 LUNCH

EVANS FINISHED N 45834 WORKING
ON FM 771 & FM 622.1400 EQ ONSITE PUMPED LOADS OUT OF
SLUDGE BOXES & OUT OF DAP UNIT.TRI-HYDRO ADDS ANOTHER CAUSTIC
DRUM TO HIGH PH FRAC.1500 EVANS FINISHES WITH FM 622
CONT ON WITH FM 771.BAKER WILL BE ON-SITE TOMORROW
TO REMOVE T-TANK GS-17.1545 OFF-SITE TO TAKE JEFF EVANS TO
RENTAL LOT.


THURS BPA-PRP OVERSIGHT

4/22/10

0700 START ON-SITE

EVANS CLEANING ON FM 771 THIS MORNING

TRI-HYDRO CONDUCTS MORE BENCH

TESTING ON HIGH PH FRAC TANK

1000 STEVE TAWEMIER ONSITE WITH

EQ, WILL POSSIBLY PROVIDE 4 MORE

SLUDGE BOXES

PH ON FRAC WENT UP TO 3.2. EVANS

WILL APPLY 2 MORE CAUSTIC DRUMS.

1100 EVANS IS PREPARING FOR CAUSTIC
REMOVAL ON SAT. DISMANTLING
PVC PIPES IN PROCESS AREA ABOVE
SAND FILTERS.

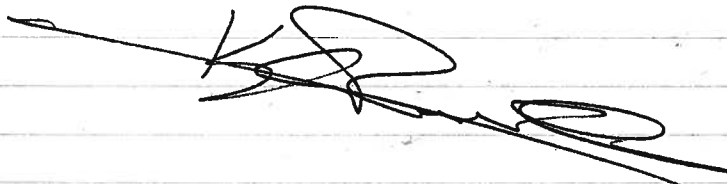
1130 LUNCH

1300 EVANS FINISHES CLEANING FM 771

& MOVES TO SPECIAL WASTE TANKS.

1410 ETS ON-SITE WITH TWO SLUDGE BOXES
FROM EQ.1530 EVANS FINISHES WITH SPECIAL WASTE
TANKS RETOUCHES THE OWS 1 & 2.

1430 START OFF-SITE



PRC BRA PRP OVERSIGHT

4/23/10

0800 START ON-SITE,

EVANS WORKING ON CLEANING LARGE

HEAVY OIL SEPARATOR IN UPPER CONTAINMENT

EVANS GOING AROUND SPOT CHECKING

ETS TANKS THAT HAD SOME SPOTS TO
BE CLEANED.

1100 RECHECK OWS 1&2 TOLD TO WIRE
DOWN ENDS THAT NEED CLEANING.

SPWASTE 5,6,7 LOOK GOOD.

SAT EVAS WILL WORK IN PROCESS ROOM
ON CAUSTIC TANK + DAF,

1330 Jimmy REGISTER (BAKER) + FOSTER
BAILEY FROM TVR, LLC COME ONSITE.

EVANS WILL CHECK LEL IN BAKER
TANK. SPURLIN WILL DRAFT UP LETTER
AND RELEASE TANKS TO TVR FOR
RECYCLE.

EVANS CLOSED ALL T-TANKS EARLIER
WILL LOWER LEL MONITOR DOWN
INTO EACH FOR % READING. WILL
CONVEY READING TO EPA FOR APPROVAL.
WILL START OFF-SITE




Tennessee Valley Recycling, LLC

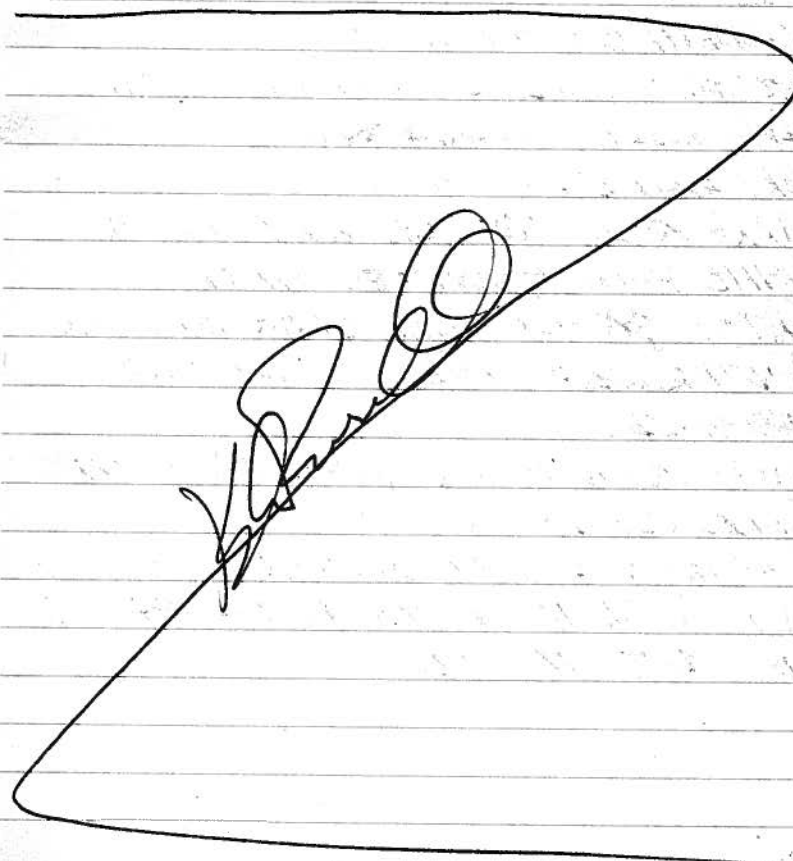
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Highway 20 West
Decatur, AL 35601

P. O. Drawer H
Decatur, AL 35602

phone 256-353-6351
fax 256-351-9246

fbailey@tvrllc.com



4-27-10

0640 - JAMES CARITHERS ON SITE.
MEET W/ HEATHER BARBARE-TRIHYDRO
REVIEW H#S

WILL BE CLEANING & REMOVING
FRAC TANKS THIS, ALSO REMOVING
CARBON FROM CARBON CELL.

0730 - PUMPING FM 397 - WATER &
FM 632 - WATER

DECONING - FM 610

REMOVE SLUDGE - N48382

SAT - 4-24-10 CAUSTIC TANK CONTENTS
DRAINING.

MON - 4-26-10 DECONKED, CLEAN
SOME PIPING WAS DRAINING

SAT - 4-24-10 - DAF CLEANED

ENTER CAKE PRESS - PRESSURE
WASHED.

MON - 4-26-10 SULFURIC ACID TANK
CLEANED.

OWS - 1 & 2 SPOT CLEANED - GOOD

MON - 4-26-10 - DECON N48444

FRI - 4-23-10 - DECON HEAVY O/W

SEP. GOOD

Full Caruthers

MON - 4-26-10 - PUMPING WASTE
FROM FM 397, FM 610 & N48382
BAKER MOVED 2 FRACS - 6429D,
ST 137 ST OFF SITE MON. 4-26-10
1245 - CLEAN FM 397, VAC FM 632
VAC N48382

1415 CONTINUE VAC N48382

1420 CLEANING CARBON FROM VESSEL #2

1545 CONTINUE VAC N48382 & WORK
ON CARBON VESSEL #2

1050 OFF SITE.

Full Caruthers

4-27-10 PHOTO LOG BY JWC

TIME DIR.	DESCRIP.
0945 N	CAUSTIC TANK
0946 N&W	DAF - 2 PHOTOS
0949 W	FILTER PRESS
0951 W	SULFURIC ACID TANK
0953 N	HEAVY O/W SEP. - 2 PHOTOS
0956 E	N48444
1001 E	OWS-1
1002 W	OWS-2
1022 W	CARBON VESSEL NO. 2 (CF-100)

4-28-10

0830 E PUMP NON-HAZ TOTES
 0833 W RUPTURED HYDRAULIC LINE ON
 MEI TRUCK.
 0840 W MEI HYDRAULIC FITTING RUPTURE.
 0935 W CARBON VESSEL NO. 2 (CF-100)
 CLEANED OUT.
 1120 N CLEANED N48382
 1225 SW PUTTING DOWN OIL DRY ON HY-
 DRAULIC SPILL.
 1240 N FM 610 CLEAN
 1253 N CUT UP EMPTY NON-HAZ TOTES

JWC

4-28-10

0650 - START - J. CARUTHER ON SITE
 EEC CONTINUES TO EMPTY N48382
 PLAN TO FINISH PUMPING FM 632
 & CLEAN CARBON CELL VESSEL 2
 (CF-100)

0800 - PUMP NON-HAZ TOTES INTO
 TANKER FOR TRANSPORT.

0815 - HYDRAULIC LINE RUPTURE ON
 MEI TRUCK, APPROX. 20 GAL.
 SPILLED, MEI ON WAY TO CLEAN
 UP & REPAIR.

DRAINAGE WAS BERNED TO
 CONTAIN SPILL. HYDRAULIC
 FITTING RUPTURED.

0905 - HEATHER BARBARE - TRI HYDRO &
 J. CARUTHERS - START CALLED
 S. SPURLIN - EPA TO REPORT
 HYDRAULIC SPILL, LEFT MESSAGE.

0930 CLEANING N48382

1115 PUMPING MORE NON-HAZ TOTES.
 N48382 IS CLEAN.

CUTTING UP EMPTY NON-HAZ TOTES
 1140 MEI ON SITE TO FIX HYDRAULIC

JWC

4-28-10

1225 - PUTTING DOWN OIL DRY ON
HYDRAULIC SPILL.1240 FM QID IS CLEAN, FM 632
IS EMPTY.

1257 CLEANING FM 632

1330 PUMPING FROM FM 543

MEI MINI-EXCAVATOR ON SITE.

1345 BEGIN SCRAPING & CLEANING UP
HYDRAULIC SPILL.1400 REMOVING DRUMS & PAILS FROM
UNDER CANOPY'S AT SE CORNER OF
SITE - NON-HAZ.1430 DUMP NEW GRAVEL AT HYDRAULIC
SPILL, LOAD WASTE MATERIAL &
THEN SPREAD NEW GRAVEL.

1545 FINISH HYDRAULIC SPILL CLEANUP.

1645 SURGE TANK HAS BEEN CLEANED.
(NT-100)

1700 OFF SITE.

J. W. Cantham

4-28-10 PHOTO LOG BY JWC

TIME DIR. DESCRIP.

1347 SW SCRAPING UP HYDRAULIC SPILL.

1355 W EXCAVATING HYDRAULIC SPILL.

1400 W " " "

1424 NW " " "

1430 E DUMPING NEW GRAVEL AT
HYDRAULIC SPILL.

1530 N CLEANED FM 632

1541 W FINISHED HYDRAULIC CLEANUP

1542 SW " " "

1620 - W CUT UP NON-HAZ TOTES

1655 W CLEANED SURGE TANK

(NT-100)

4-29-10

0940 E WASTE - FM 543 - 2 PHOTOS

1045 E LOADING HAZ-WASTE - AM. &
SODIUM HYDROXIDE; ROBBIE D. WOOD
TRUCKING.

4-30-10

0844 NE SAND FILTER #1

0846 S FM 771

0848 S N45034

0849 W FM 1118

0851 NW FM 1338

J. W. Cantham

4-29-10

0650 - START - CAROTHERS ON SITE,
 EEC CONTINUES PUMPING FROM FM
 543
 STAGING DRUMS FROM CANOPY AREA,
 SE CORNER, TO NE CORNER, NEAR
 ENTRANCE GATE, FOR PICK UP.
 0930 CONTINUE PUMPING FM 543
 0815 EQ IND. SER. ON SITE TO
 TAKE WASTE.
 1030 ROBBIE D. WOOD ON SITE LOADING
 HAZ-WASTE TOTES - AM. HYDROXIDE &
 SODIUM HYDROXIDE.
 1230 - 2ND ROBBIE D. WOOD TRUCK
 LOADED
 1400 - CONTINUE PUMPING FM 543
 1630 - ALL DRUMS FROM CANOPY AREA
 AT THE SE HAVE SHIPPED OUT
 OR ARE STAGED NEAR THE GATE
 AT THE NE IN PREP. FOR SHIP-
 MENT ON MON. 5-3-10.
 1710 OFF SITE

J. W. Caruthers

4-30-10

0650 - START - J. CAROTHERS ON SITE
 CLEAN HARBORS & ROBBIE D. WOOD
 ON SITE REMOVING SLUDGE BOXES,
 EEC CONTINUES PUMPING FM 543
 0800 CLEAN HARBORS MOVING SLUDGE
 BOXES SO ETS CAN REMOVE FRAC
 TANKS.
 0800 INSPECT FRACS FOR CLEANLINESS
 BEFORE THEY ARE REMOVED FROM
 THE SITE BY ETC.
 1030 EEC CONTINUE PUMPING FM 543
 NEARING COMPLETION.
 1200 FINISH PUMPING FM 543
 1210 BAKER ON SITE TO PICK UP A
 BAKER FRAC.
 1300 EEC PRESSURE WASHING FM 543
 1330 ETS PICKING UP FRACS.
 1500 EEC FINISH CLEANING FM 543
 1515 ETS CONTINUES MOVING FRACS
 OFF SITE.
 1600 OFF SITE

J. W. Caruthers

4-30-10 PHOTO LOG

TIME	DIR.	DESCRIP.
------	------	----------

0853	S	FM 397
------	---	--------

0859	W	FM 1295
------	---	---------

0900	E	FM 1043
------	---	---------

0902	E	FM 422
------	---	--------

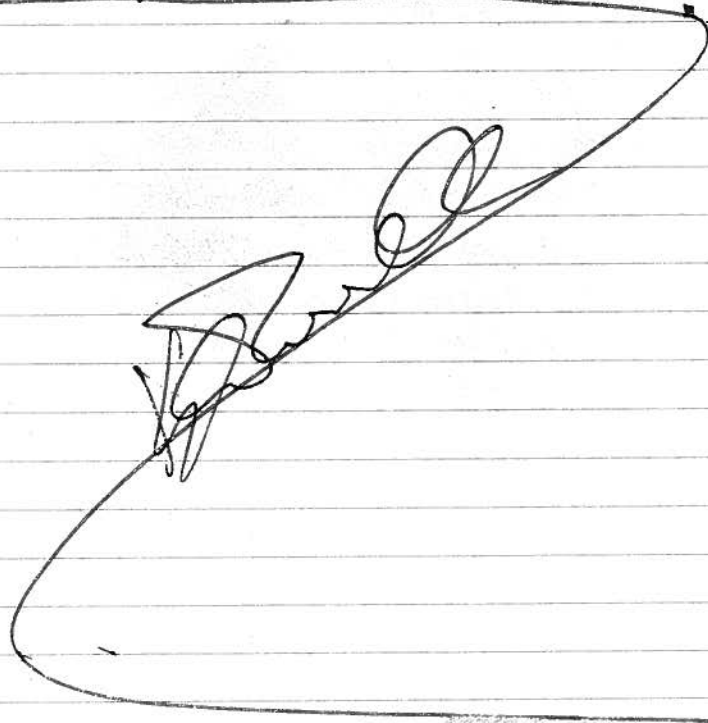
0904	S	N 4411
------	---	--------

0907	E	N 48444
------	---	---------

0909	N	N 48445
------	---	---------

0910	S	N 19410
------	---	---------

1501	W/E	FM 543, 2 PHOTOS
------	-----	------------------



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JOURNAL

No. 391

ITEMI-05-001-0119

Biological Processors of Alabama - Enforcement

LOGBOOK 02



Project _____

602.697.1397 (cell)

3-30-10

BPA Enforcement

B. Croft

0750 onsite @ BPA (mailed from Duluth GA)

meet w/ TriHydro reps

Gary Riese

Heather Barbary

0815 tour area to look at proposed boring locations

0920 TriHydro's subcontractor (Geoprobe) onsite

0955 begin Geoprobe location S-DRAINAGE-02

- in drainage ditch between south fence line and

asphalt driveway

- refusal encountered @ approx 5 ft. bgs

- red clay

OFFSET (1) ~ 5 ft. west

TD = 8 ft - red clay

OFFSET (2) ~ 5 ft. west

TD = 11 ft - red clay

1045 OSC Spectra, TriHydro Riese, & STARR

tour process bldg

- return samples from refrigerator in NE corner

bldg to be labpacks/contaminated

- tank SST-#3 - apparently a "false" bottom

in tank - TriHydro will inspect & empty as

necessary

1115 completed Geoprobe location S-DRAINAGE-01 (down gradient from -02)

TD = 12 feet bgs - red clay (refusal)

note highest PID rdy = 16 ppm

BSC 3-30-10

3-30-10

BPA Enforcement

B. Croft

1125 begin Geoprobe location BA-01

- down burial area outside west fence line (NE point)

~ 1-2 ft. brown fill

~ 2-15 ft. red clay w/ white gravel / silt lenses

TD = 15 ft bgs

1150 begin Geoprobe location BA-02

- burial area outside west fence line (NW point)

- refusal @ ~ 7 ft.

- offset x offset

↳ TD = 15 ft bgs

same litho as BA-01

PID = map ready =

1220 begin Geoprobe location BA-03 (SW point)

- burial area (SW corner)

TD = 15 ft bgs (same litho as BA-01)

PID = map rdy =

1240 begin Geoprobe location BA-04

- burial area (SE corner)

TD = 12 ft bgs (same litho as BA-01)

PID map rdy =

(ass)

note: TriHydro is sending samples to Analytical Services, Inc

in Atlanta, GA

- collecting 2 samples per boring (total = 24) plus

2 surface soil samples in ditch @ front of

property along Finley Island Rd.

BSC 3-30-10

3-30-10

BPA Enforcement

B. Croft

note: soil samples being collected initially in plastic ziplock bags - PID readings are from bag headspace after sitting (0.2; 2.4; 4.6; etc to TD)

1320 LUNCH

~~1355~~~~1455~~~~1410~~~~1510~~

Atlas Geoprobe crew returns from lunch

begin Geoprobe location ~~E~~^W - CONTAINMENT~~1430~~ begin Geo_W - TD = 15 ft. bgs

↳ red clay w/ white gravel

1430 begin Geoprobe location E - CONTAINMENT

TD = 16 ft bgs

↳ red clay w/ white gravel

note: TriHydro Gary Risse stated that they would be re-sampling free tank FM 138 to re-check previously elevated levels of MEK

1530 begin Geoprobe location S-TANKS-02

- west side of solidification pits

- TD = 7 ft. bgs (hitting concrete) - low recovery

↳

offset once w/ same result

gray (concrete?)

⊙ bottom = 7 ft

1605 begin Geoprobe location S-TANKS-01

- east side of solidification pits

- TD = 9 ft bgs (hitting concrete) - offset once w/

↳ red clay

- 02

same result

note: S-TANKS-01 + 02 - approx 2 ft concrete present, then ~ 5 ft soil, then concrete (apparently)

BSC 3-30-10

3-30-10

BPA Enforcement

B. Croft

1710 begin Geoprobe location N-DRAINAGE-02

- in north drainage ditch immediately outside access gate

TD = 16 ft bgs

↳ 0-4 ft - tan sand

4-16 ft - red clay

1735 begin Geoprobe location N-DRAINAGE-02

- in north drainage ditch approx. 50 ft. from Finley Island Rd.

TD = 16 ft bgs

↳ 0-4 ft - sand

4-16 ft - red clay

1815 offsite - demo to Duluth, GA

note: TriHydro will collect remaining 2 surface soil samples (0-12") w/ hand augers tomorrow

BSC 3-30-10

APPENDIX D
TABLE OF WITNESSES
(One Page)

TABLE OF WITNESSES
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