



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)

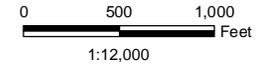
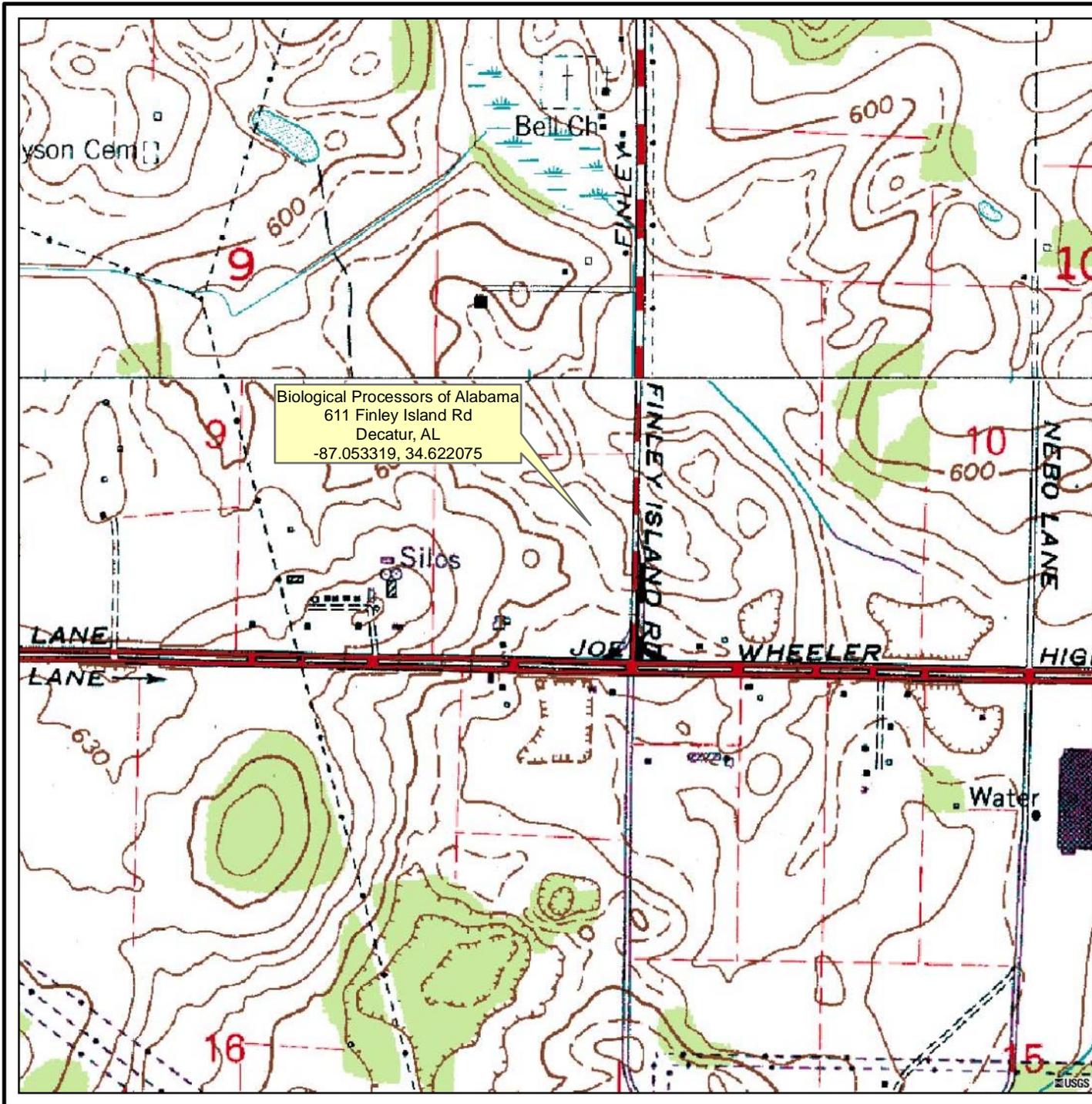
cc: Katrina Jones, EPA Project Officer  
Darryl Walker, EPA Alternate Project Officer  
Angel Reed, START III Document Control Coordinator



**APPENDIX A**

**FIGURES**

(Two Pages)



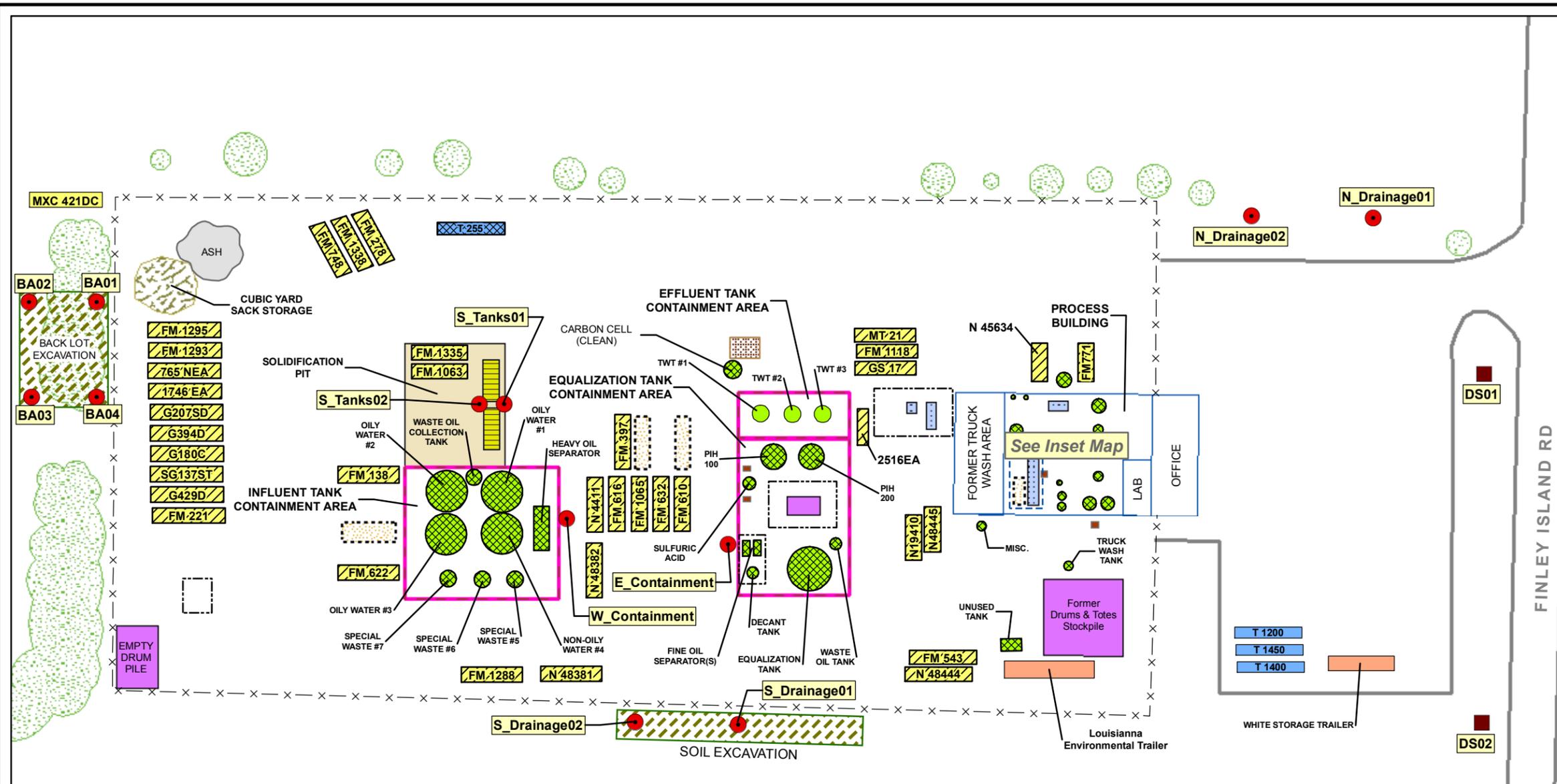
MAP SOURCES:  
 JONES CROSSROADS, AL 1976  
 & TRINITY, AL 1975  
 USGS TOPOGRAPHIC QUADRANGLES



BIOLOGICAL PROCESSORS  
 OF ALABAMA  
 DECATUR,  
 MORGAN COUNTY,  
 STATE  
 TDD No. TTEMI-05-001-OFFJ

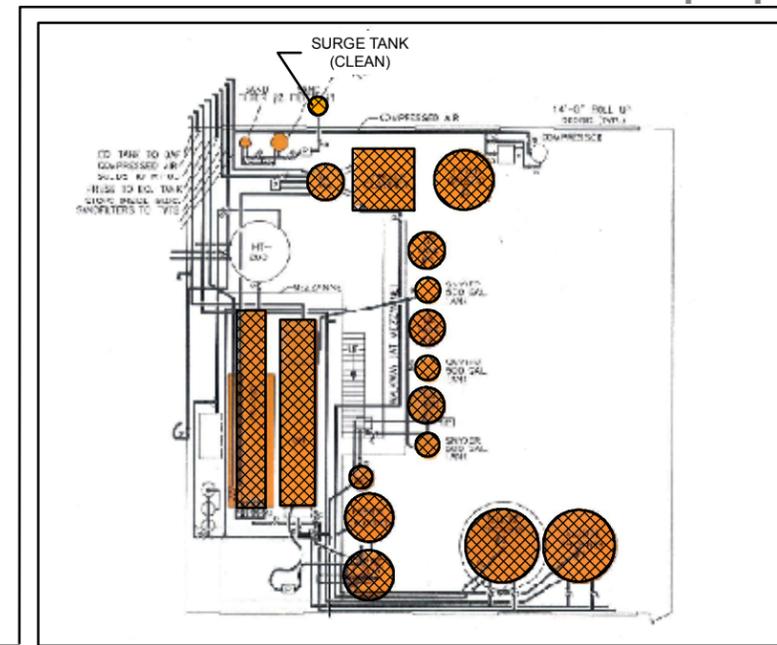
**FIGURE 1  
 SITE LOCATION**





**LEGEND**

- Trihydro Soil Boring Locations
- Trihydro Sediment Sampling Locations
- ▨ Empty and Clean
- ▩ Clean and Removed from Site
- Frac Tanks
- Trailers
- Aboveground Storage Tanks
- Tanker Trucks
- ▨ Roll-off Boxes Removed from Site
- Drum Areas
- Equipment Areas
- Pile
- Totes
- Settling Tank
- ▨ Canopy
- ▨ Filter Press Area
- Shed
- ▭ Building Outline
- ▭ Containment Area
- ▭ Solidification Pit
- Trees/Wooded Area
- × Fence
- Paved



United States Environmental Protection Agency

BIOLOGICAL PROCESSORS OF ALABAMA  
 DECATUR,  
 MORGAN COUNTY,  
 ALABAMA  
 TDD No. TTEMI-05-001-0119

**FIGURE 2**  
**BPA FACILITY LAYOUT**  
**AND SAMPLING LOCATIONS**  
**AS OF 7/16/2010**



2010-7-16 GIS Workspace\TTEMI-05-001-0087 Biological Processors of Alabama\Figures\GIS\Map\BPA Site Layout 7-16-10.mxd icdv summer

**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

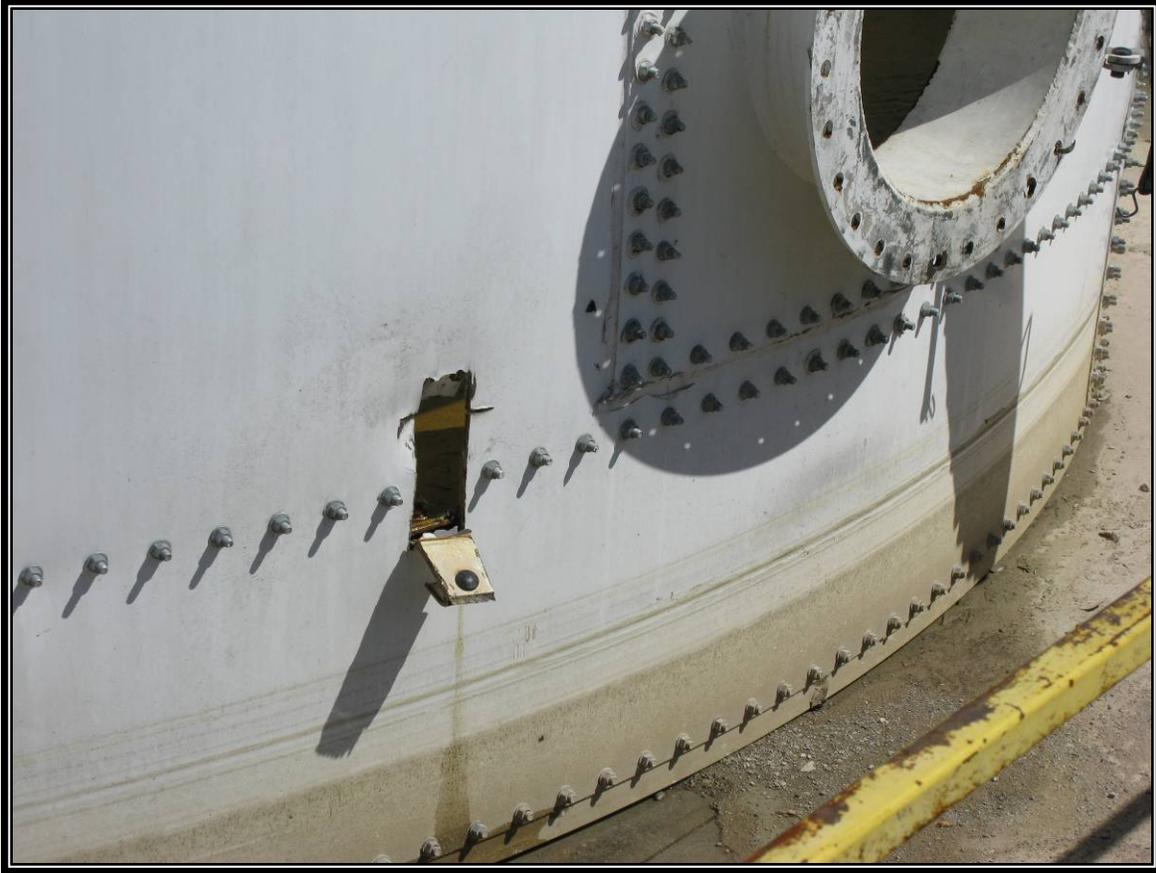
**Date:** April 7, 2010

**Photographer:** Kyle Russell, Tetra Tech

**Witness:** Heather Barbare, Trihydro

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





**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.





**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

STEAL-05-001-0119

BPA Enforcement

LOGBOOK 01





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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 HABP

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 M21

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

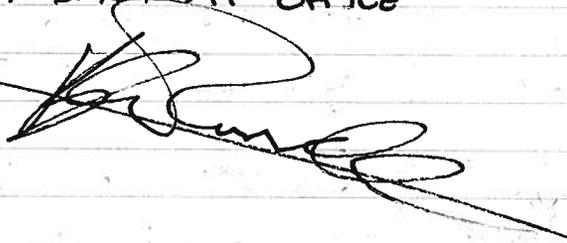
1105 CH COLLECTS SAMPLE FROM FM 1295

1115 CH COLLECTS SAMPLE FROM FM 1295

*Kel Risse*

3/9/10

- 1120 CH COLLECTS SAMPLE FROM G 2075D  
 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, ~~From~~ <sup>OR</sup> 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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3/10/10

0700 START HEADS OUT FOR SITE  
 0830 START ARRIVES ON SITE TO  
 MEET TRIHYDRO + 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	SG 1375T	FM 357
--------	----------	--------

FM 1338	FM 138	FM 1065
---------	--------	---------

FM 748	FM 622	FM 632
--------	--------	--------

FM 610	N48444	FMS43
--------	--------	-------

N19410	N48445	
--------	--------	--

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

1200 EQ FINISHES COLLECTING  
 SAMPLES

230 START CLOSES UP SITE START,

TRIHYDRO + EQ LEAVE SITE

330 START BACK AT OFFICE

*[Signature]*

ISRA - PRP OVERSIGHT

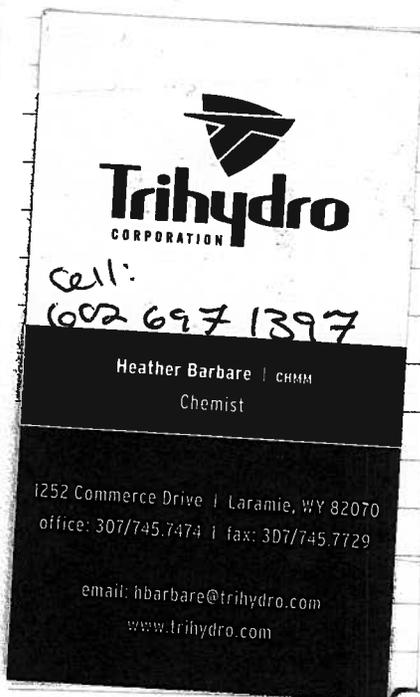
4-6-10

1015 START ARRIVES AT SITE TO MEET  
 WITH GARY RYAN & 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 TRIHYDRO.

1130 START OFF-SITE



*[Signature]*

WEDS BPA-PRP OVERSIGHT 4-7-10

0800 START ON-SITE

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

TODAY'S FORECAST IS OVERCAST + BREEZY

TONIGHT WITH A CHANCE OF STORMS

0930 EVANS HAS BEEN WORKING ON  
BACK ROW OF TANKS. CLEANING FM-201  
+ VACUUMING IT OUT. EVANS EEC IS USING  
A DSR-50 SODIUM HYDROXIDE CLEANING  
SOLUTION FOR THE FRAC TANKS

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

RODNEY SWINEY 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.

OTIS 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  
15G1375T, and G180C

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

1130 CH TRUCK LOAD UP.

<sup>R\*</sup> ~~B\*~~ 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 FRAC

TANKS FM1335 & FM1063. THE TRUCK OVERFILLED AND RELEASED APPROX 80 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 FM 1295 & 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

1530 TRUCKS 5 & 6 FROM CH ON-SITE

1630 START OFF-SITE

*H. J. [Signature]*

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

1530 EEC FINISHING UP & SHUTTING DOWN START OFF-SITE

1630 START HOME

*[Signature]*

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  
 & TETS & 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 N48445.

FM1336, FM746 ARE CLEAN.

1100 N48445 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 ~~TRUCKS ARRIVE~~ EVANS OFF  
 SITE. TWO MORE TRUCKS ARRIVE  
 TO LOAD OUT WASTE

1800 START HOME.

1 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.

11 0835 CALLED BAKER. MR HAYES WILL

12 BE ON-SITE NEXT MONDAY.

13 ETS WILL BE ON-SITE LATER TODAY.

14 0930 ETS OFF-SITE. THERE ARE STILL  
15 AREAS ON TANKS THAT NEED TO BE  
16 ADDRESSED. OILY RESIDUE, FLANGE & PIPE

17 AREAS NEED TO BE CLEANED OUT.

18 1100 LUNCH

19 1130 CH & EQ ON SITE LOADING OUT

20 EVANS CREW IS ADDRESSING AREAS THAT

21 WERE NOT CLEANED ON THE FRACS

22 INITIALLY.

23 22 LOADS TOTAL WENT OUT TODAY.

24 01500 START OFF SITE

25 01545 HOME

*[Handwritten signature]*

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 CLEANED  
YESTERDAY.

EVANS EEL IS WORKING ON CLEANING  
FRAC FM 1288 & N4E381

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

*[Handwritten signature]*

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 1 FOOT OF SLUDGE  
EVANS EEC CLEANING FM1065

1100 ACCESS HOLES ARE CUT 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

WAS 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. GS 17

WILL GO OFF MAY TAKE 2516EA.

1500 ETS ON-SITE MOST OF THE

FRACS ARE CLEAN & READY TO  
GO OFF.



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Branch Manager

**TANK DIVISION**

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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  
CON'T PUMPING FROM FM 1118.

0750 OSC SPORLIN ON-SITE

0800 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

095 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

*[Handwritten 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 2070 TO  
FRAC N 48044 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.

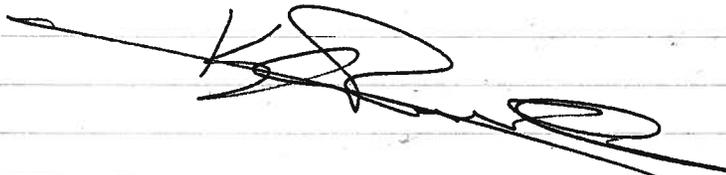
1130 LUNCH

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 WIPE

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.

WDD START OFF SITE



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4-21-10

0640 - JAMES CARUTHERS ON SITE.  
MEET W/ HEATHER BARBARE - TRINHYDRO  
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  
DRAINED.

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

SAT - 4-24-10 - DAF CLEANED

FILTER 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

*James Caruthers*

MON - 4-26-10 - PUMPING WASTE  
FROM FM 397, FM 610 & N48382  
BAKER MOVED 2 FRACS - 6429D,  
ST 1375T 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.

*James 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 RUP-  
 TURE,  
 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

01050 - 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 - TRIHYDRO &  
 J. CARUTHERS - START CALLED  
 S. SPURLIN - EPA TO REPORT  
 HYDRAULIC SPILL, LEFT MESS  
 AGE,  
 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 Q10 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 CANOPIES 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. Cauffman

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. Cauffman

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 HARBOUR & ROBBIE D. WOOD  
ON SITE REMOVING SLUDGE BOXES,

EEC CONTINUES PUMPING FM 543

0800 CLEAN HARBOUR'S 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.

1000 FINISH PUMPING FM 543

1210 BAKER ON SITE TO PICK UP A  
BAKER FRAC.

1300 EEC PRESSURE WASHING FM 543

1300 ETS PICKING UP FRACS.

1500 EEC FINISH CLEANING FM 543

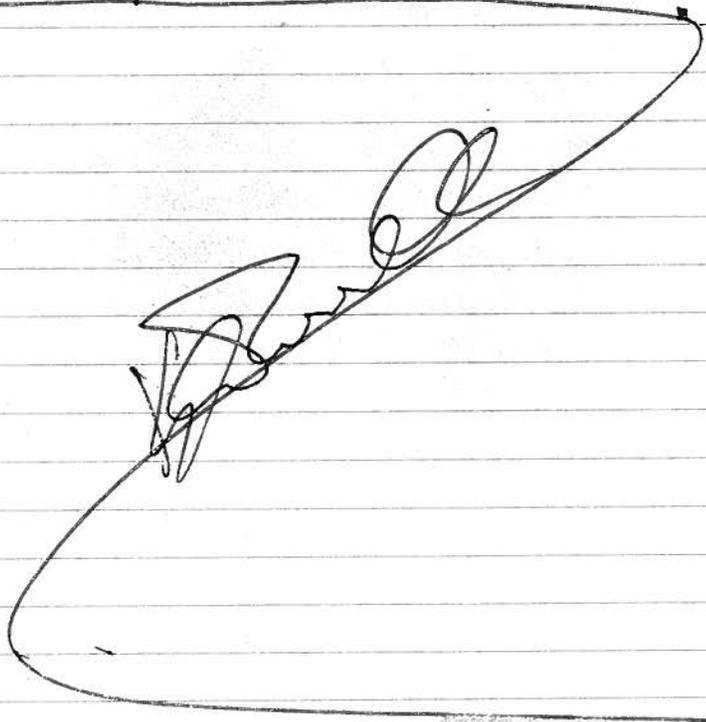
1515 ETS CONTINUES MOVING FRACS  
OFF SITE.

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 441
0907	E	N 48444
0909	N	N 48445
0910	S	N 19410
1501	W/E	FM 543, 2 PHOTOS



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TEMI-05-001-0119

Biological Processors of Alabama - Enforcement

LOGBOOK 02



3-30-10 BPA Enforcement B. Croft

0750 onsite @ BPA (mashed from Duluth Ct)

meet w/ TriHydro reps

Gary Riase

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 Riase, & STARR

tour process bldg

- return samples from refrigerator in NE corner

bldg to be labpacked/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 / sub lenses

TD = 15 ft bgs

1150 begin Geoprobe location BA-02

- burial area outside west fence line (NW point)

- refusal @ ~ 7 ft.

- ~~offset~~ 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 = <sup>12</sup>/<sub>sc</sub> 15 ft bgs (same litho as BA-01)

PID map rdy =

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 Atlas Geoprobe crew returns from lunch

1410

1510 begin Geoprobe location <sup>W</sup> E-CONTAINMENT

1430 begin Geo<sub>W</sub> - 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 FM138 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  
- red clay w/ 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 - Demobe 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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