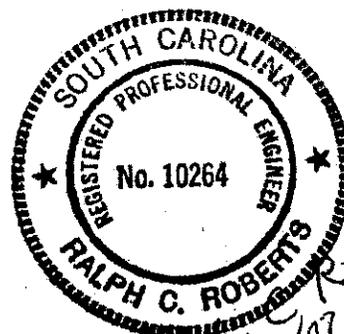


**CONE MILLS SITE  
PCB SOIL REMOVAL FINAL REPORT**

**September 13, 2007**

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PCB SOIL REMOVAL FINAL REPORT**

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# CONE MILLS SITE PCB SOIL REMOVAL FINAL REPORT

## 1.0 Introduction

Duke Energy Corporation (Duke) received a General Notice of Potential Liability letter from the South Carolina Department of Health and Environmental Control (DHEC) dated March 2, 2005 for the Cone Mills Site in Greenville, SC. At the end of August 2006, US Finishing, Piper Properties, DHEC and Duke agreed to a Consent Decree which assigned responsibility for the investigation and where needed, the remediation of polychlorinated biphenyl (PCB) to Duke. The Consent Decree was approved by the US District Court November 1, 2006.

After completing a site investigation, Duke developed a plan to remove the PCB impacted soil and submitted the *Cone Mills Site PCB Soil Removal Plan* dated January 31, 2007. The plan and the Action Memorandum were approved by the DHEC on May 7, 2007. Soil removal activities started May 7, 2007 and concluded June 22, 2007.

This report provides details of the activities and the results of the PCB soil removal at the Cone Mills Site.

## 1.1 Objective

The objective of the project detailed in this report was to remove the PCB impacted soil identified in the site investigation.

## 1.2 Scope

The project scope was limited to a removal action of PCB impacted soil and debris at the Cone Mills Site. Piper Properties or US Finishing, the other potentially responsible parties (PRPs) at the site, may perform other remediation activities.

## 1.3 Location

The Cone Mills site is located at 3335 Old Buncombe Road, Greenville, SC. This is approximately three miles north of downtown. The site includes a number of tracts of land currently or previously owned by Cone Mills with a total area of approximately 250 acres. Starting in the early 1950's Duke leased a fifty-foot square portion of the site to use as a substation to provide electricity to the mill. The Duke substation is located at 34°52'57" N and 82°25'34" W on the east side of the mill building. The site is bordered by the Reedy River to the south,

Langston Creek and Highway 253 and to the east, a residential neighborhood to the west and Old Buncombe Road to the north. The site location is shown in Figure 1, a portion of the USGS topographic map of the site is shown in Figure 2, and the site plan is shown in Figure 3.

The Northern Reservoir is a man-made process water storage basin previously utilized by the mill and is located north of Old Buncombe Road at coordinates 34.8883° N and 82.4297° W. At the time of the soil removal, US Finishing was draining the Reservoir. Prior to the start of draining, it covered an area of approximately 16 acres, with a maximum depth of 15 feet.

## 2.0 BACKGROUND

### 2.1 Site History

The mill at the site started operations in 1902 and continued until 2003 when a fire partially destroyed the facility. The mill owners include the Arrington Family (1902-1947), Aspinook (1947-1952), Cone Mills Corporation (1952-1984), and American Fast Print under the name of U.S. Finishing (1984-2006). The US Finishing Corporation was dissolved at the end of 2006. Until the mid-1960's plant operations discharged process waste into Langston Creek and the Reedy River. After that time an aeration lagoon was used to equalize the process waste, which was then discharged to the sewer system. Sludge and other wastes have been buried onsite.

In 1984, Cone Mills executed a Consent Order with DHEC for the remediation of chromium contamination at the Site. Cone Mills filed for bankruptcy in 2003 and ceased operations of the onsite treatment system.

### 2.2 Site Investigation

The Consent Decree includes a Scope of Work that defines the requirements for the site investigation. Areas of known or suspected PCB contamination to be investigated include the electrical substation, two areas where Duke Energy pole mounted transformers are or have been located, the area around the Oil Pump House, the Coal Storage Area and the Northern Reservoir.

Details of the anticipated investigation activities are provided in two work plans, the *Cone Mills Site Duke Energy Corporation Investigation Work Plan*, dated August 30, 2006 and the *Cone Mills Site Duke Energy Corporation Northern Reservoir Investigation Work Plan*, dated September 4, 2006.

Duke Energy started field activities for the investigation in September 2006. The soil investigation occurred in several phases, starting out in each area of known

or suspected PCB contamination and expanding until clean perimeter samples results were obtained or physical barriers prevented further contaminant delineation. The investigation activities and results are described in the *Cone Mills Site PCB Investigation* report, dated January 17, 2007. The soil sample results summary tables from the Investigation Report are provided as Tables 1, 2 and 3. The planned excavation areas and sample locations are provided in Figures 4, 5 and 6 from the *Cone Mills PCB Soil Removal Plan*.

### 2.3 Cleanup Goal

The proposed PCB cleanup goal for the Cone Mills Site was a concentration of 1 part per million (ppm) in the soil. This is the cleanup standard listed in 40CFR761 for an unrestricted high occupancy area. Due to the draining of the reservoir, the former sediment in the reservoir was treated as soil with a cleanup of 1 ppm.

Excavated soil with a concentration of less than 30 ppm was disposed at Waste Management's Palmetto Landfill (Palmetto Landfill) in Spartanburg, SC. Excavated soil with a concentration of greater than 30 ppm was disposed at Waste Management's Landfill in Emelle, Alabama (Emelle Landfill).

### 3.0 Substation Soil Removal

For purposes of the soil removal action, the substation excavation area was divided into five sections based on the depths of PCB contamination and the PCB concentrations in the investigation samples. Figure 4 shows the proposed substation excavation areas and investigation sample locations; Table 1 is the site investigation analytical summary table for the substation area. The actual excavation areas for the substation along with confirmation sample locations are shown in Figure 7; Table 4 summarizes the confirmation samples analytical results. Photographs of the excavation are provided in Appendix 2.

#### 3.1 Soil Removal Area

Section A was the western most portion of the excavation. It is adjacent to the mill building and includes a portion of the roadway. The planned area of excavation was approximately 2600 ft<sup>2</sup> and the planned depth of the excavation was one foot.

After the planned soil was removed from Section A, confirmation sampling indicated additional material required removal. This additional excavation extended south along the building and roadway to the building corner except where concrete structures prevented soil removal. The additional soil removal

was to a depth of two feet. The completed excavation area for section A was approximately 3650 ft<sup>2</sup>.

All soil removed from Section A had PCB concentrations below 30 ppm (the maximum PCB concentration detected in Area A was 8.5 ppm) and was transported to the Palmetto Landfill for disposal.

Section B was the capacitor area of the substation and includes a small area south of the fence line. Several surface samples in this section had PCB concentrations exceeding 30 ppm with a maximum detected concentration of 96.2 ppm. The planned area of excavation was approximately 760 ft<sup>2</sup> and the planned depth of the excavation was two feet.

After the initial planned area of soil was removed from Section B to a depth of one foot, confirmation sampling indicated that additional material did not need to be removed either laterally or vertically. The completed excavation area for Section B was approximately 650 ft<sup>2</sup>.

All of the soil removed from Section B was assumed to have PCB concentrations exceeding 30 ppm and was transported to the Emelle Landfill for disposal.

Section C was located east of the substation and along the impoundment. It had a planned area of excavation of approximately 1200 ft<sup>2</sup> and a planned depth of excavation of two feet. The maximum PCB concentration detected during the investigation was 267 ppm.

The initial excavation of the area C was to a depth of one foot. The excavated material was sent to the Emelle Landfill for disposal. Composite samples collected from the next layer of soil to be removed (COM-C001 and COM-C002) determined that the material had PCB concentrations below three ppm and the material could go to Palmetto Landfill for disposal. The excavation of material continued to a depth of two feet below the original grade. Based on confirmation sampling two areas required additional excavation to a total depth of four feet below the original soil surface grade. The horizontal extent of Section C did not increase. The completed excavation area for Section C was approximately 960 ft<sup>2</sup>. The actual excavation area was significantly less than the planned excavation because the US Finishing substation, which was originally included in this area, was excavated as part of Section D.

Section D was east of the Duke substation and north of the US Finishing substation. It had a planned area of excavation of approximately 400 ft<sup>2</sup> and a planned depth of excavation of six feet. The maximum PCB concentration detected during the investigation was 137 ppm at the ground surface.

The top one-foot of Section D was excavated and transported to the Emelle, Landfill for disposal. Composite sampling of the next layer to be removed (COM-

D001 and COM-D002) determined that the material had PCB concentrations of 10 ppm or less, and the material could go to the Palmetto Landfill. The excavation of material continued to a depth of six feet below the original soil surface grade. Based on confirmation sampling, one area required additional excavation to a total depth of eight feet. The horizontal extent of Section D was expanded to include the former US Finishing substation. That substation was excavated to a depth of two feet. The completed excavation area for Section D, including the US Finishing substation, was approximately 630 ft<sup>2</sup>.

Section E was the excavation area to the north of the substation. It had a planned area of excavation of approximately 3,000 ft<sup>2</sup> and a planned depth of excavation of one foot. The maximum PCB concentration detected during the site investigation was 22.9 ppm. Material removed from Section E was transported to the Palmetto Landfill.

The planned soil removal area and depth for Section E was completed and confirmation samples collected. Six areas required additional excavation to a total depth of two feet. The horizontal extent of Section E was expanded slightly in the northeast corner. The completed excavation area for Section E was approximately 3,000 ft<sup>2</sup>.

### 3.2 Confirmation Sampling

A total of 27 confirmation samples were collected from Section A during the excavation activities. The samples were analyzed for PCB following EPA Method 8082. Eleven of those samples were collected from the ground surface along the perimeter of the excavation. Analytical results for four of those surface samples were above the cleanup standard of 1 ppm. The excavation in those areas was expanded to remove the area exceeding the cleanup standard. Additional surface samples were then collected. This process was continued until clean perimeter samples were obtained. Sixteen samples were collected from the bottom of the excavation. Analytical results for all of the bottom samples were below the cleanup standard. Five of the samples collected as part of the investigation along the perimeter of Section A that had analytical results less than the cleanup standard were used as confirmation samples. A summary table of the confirmation sample analytical results is provided in Table 4. The analytical lab reports are provided in Appendix 1.

A total of five confirmation samples were collected from Section B during the excavation activities; four samples from the bottom of the excavation and one perimeter sample. Analytical results were below the cleanup standard of 1 ppm for all of the samples. Four of the samples collected as part of the investigation along the perimeter of Section B and had analytical results less than the cleanup standard, were used as confirmation samples.

A total of 12 confirmation samples were collected from Section C during the excavation activities; eight from the bottom of the excavation at a depth of two feet, two from the bottom of the excavation at a depth of four feet where additional excavation was required and two perimeter samples. Five of the samples collected as part of the investigation along the perimeter of Section C and had analytical results less than the cleanup standard, were used as confirmation samples.

A total of five confirmation samples were collected from Section D during the excavation activities. All of the samples were collected from the bottom of the excavation. Two from a depth of two feet, in the former US Finishing substation, two from a depth of six feet and one from a depth of eight feet.

A total of 24 confirmation samples were collected from Section E during the excavation activities. Fourteen of the samples were collected from the bottom of the excavation at a depth of one foot. The results for six of these samples exceeded the cleanup standard of 1 ppm. After additional soil removal, six samples were collected from the bottom of the excavation at a depth of two feet. Four of the samples were collected from the ground surface along the perimeter of the excavation. Nine samples collected as part of the site investigation along the perimeter of Section E and had analytical results less than the cleanup standard, were used as confirmation samples.

A summary table of the confirmation sample analytical results is provided in Table 4. The analytical lab reports are provided in Appendix 1.

#### 4.0 Pole Mounted Transformer Area Soil Removal Activities

A pole mounted transformer was previously located approximately 150 feet north of the Groundwater Treatment Building near Langston Creek. A fire at that transformer occurred in 1998 and it was subsequently removed.

A Duke Power pole mounted three-phase transformer is currently located near the Groundwater Treatment Building.

#### 4.1 Soil Removal Area

For purposes of the soil removal action, the Pole Mounted Transformer Area was divided into three sections based on the depths of PCB contamination and the PCB concentrations in the investigation samples. Figure 5 shows the planned pole mounted transformer excavation areas and the investigation sample locations; Table 2 is the site investigation analytical summary table for the pole mounted transformer area. The actual excavation areas along with the confirmation sample locations are shown in Figure 8; Table 4 summarizes the

confirmation samples analytical results. Photographs of the excavation are provided in Appendix 2.

Section F was a 400 ft<sup>2</sup> area around the former pole mounted transformer with an initial excavation depth of one foot. The maximum PCB concentration detected in this area during the site investigation was 5.8 ppm. Section G was a 10 ft<sup>2</sup> area also at the former pole mounted transformer and includes sample point PMT-10 and the soil three feet in each direction. Section F surrounded Section G. The planned initial excavation depth was two feet. The maximum PCB concentration detected during the investigation in this Section was 102 ppm.

The initial excavation for both Sections F and G was to a depth of two feet instead of the planned depth of only one foot in Section F. Additional excavation was not required in either the horizontal or vertical directions.

Section H was a 150 ft<sup>2</sup> area around the pole mounted three-phase transformer with an initial excavation depth of one foot. The excavation extended to the clean, perimeter samples collected in this area. The maximum PCB concentration detected in Section H was 1.7 ppm. After the initial excavation to a depth of one foot, additional soil removal was not required in either the horizontal or vertical directions.

## 4.2 Confirmation Sampling

Five confirmation samples were collected from the combined Sections F and G. Three samples were collected from the bottom of the excavation at a depth of two feet and two samples from the surface soil along the excavation perimeter. All of the confirmation sample results met the cleanup standard.

One confirmation sample was collected from the bottom of the excavation, at a depth of one foot in Section H. The analytical results for that sample met the cleanup standard. Four samples from the site investigation were used as confirmation samples for the perimeter samples for Section H.

A summary table of the confirmation sample analytical results is provided in Table 4. The analytical lab reports are provided in Appendix 1.

## 5.0 Oil Pump House Area Soil Removal Activities

The Oil Pump House Area is located on the west side of the plant building, south of the Former Coal Storage Area. An earlier investigation, performed in 2004, detected PCB at a concentration of 36 ppm in this area. The area was excavated in October 2004 by Cone Mills to the extent practical but was limited due to existing structures. The historic excavation was approximately 4 feet by 10

feet and 2 feet deep. Results of confirmation sampling found no indication that any PCB remained. Duke collected a total of 15 soil samples in the Oil Pump House Area during the third and fourth quarter of 2006. PCB at a concentration above 1 ppm was detected in eight of the samples. The maximum concentration detected was 119 ppm.

## 5.1 Soil Removal Area

For the purposes of the soil removal action the Oil Pump House Area was divided into three sections, based on the depths of PCB contamination and the PCB concentrations in the investigation samples. The excavation was limited to the east by the mill building. A portion of the excavation was limited to the west by the Oil Pump House Building and the Silo. Figure 6 shows the planned Oil Pump House excavation areas and the investigation sample locations; Table 4 summarizes the confirmation samples analytical results. The actual excavation areas along with the confirmation sample locations are shown in Figure 9. Photographs of the excavation are provided in Appendix 2.

Section I was the southern part of the Oil Pump House Excavation. It had a planned excavation area of approximately 500 ft<sup>2</sup> extending from approximately 15 feet south of the Oil Pump House to 37 feet south of the Oil Pump House. The initial planned excavation depth was one foot. The maximum PCB concentration detected in this section during the site investigation had been 1.2 ppm.

After completing the initial planned excavation for Section I, additional excavation was not required in either the vertical or horizontal directions. Approximately 60 tons of material was removed from Area I and transported to the Palmetto Landfill for disposal.

Section J was the central part of the Oil Pump House Excavation Area. It included most of the area in front of the Oil Pump House, extending from Section I to about three feet south of the northeast corner of the Oil Pump House. This section had an area of approximately 600 ft<sup>2</sup> with an initial excavation depth of one foot. The surface samples collected during the site investigation in this area exceeded a PCB concentration of 30 ppm, with a maximum concentration of 119 ppm.

After completing the initial planned excavation for Section J, additional excavation was not required in either the vertical or horizontal directions. The material removed from Section J was transported the Emelle Landfill. The completed excavation area for Section J was approximately 515 ft<sup>2</sup>; this area was less than expected due to underground obstructions related the mill buildings.

Section K was the northern part of the Oil Pump House Area excavation. It extended from Section J to the Silo. This section had an area of approximately 600 ft<sup>2</sup>, with an initial excavation depth of one foot. The maximum PCB concentration detected in this area during the site investigation was 1.3 ppm.

After completing the initial planned excavation for Section K, additional excavation was not required in either the vertical or horizontal directions. Material removed from Section K was transported to the Palmetto Landfill for disposal. The completed excavation area for Section K was approximately 350 ft<sup>2</sup>; this area was less than expected due to underground obstructions related to the mill buildings.

## 5.2 Confirmation Sampling

Two confirmation samples were collected from the bottom of the excavation for Section I. Analytical results for these samples met the cleanup standard. Three samples from the site investigation that met the cleanup standard were used as confirmation samples to define the extent of the excavation in the horizontal direction to the south and west. The mill building limited the excavation to the east.

Four confirmation samples were collected from Section J. Three samples were collected from the bottom of the excavation and one sample was collected from surface soil along the western perimeter of the excavation. Analytical results for these samples met the cleanup standard. The mill building limited the excavation to the east and the Oil Pump House partially limited the excavation to the west.

Three confirmation samples were collected from Section K. Two samples were collected from the bottom of the excavation and one sample was collected from surface soil along the western perimeter of the excavation. Analytical results for these samples met the cleanup standard. The mill building limited the excavation to the east and the Silo partially limited the excavation to the west.

A summary table of the confirmation sample analytical results is provided in Table 4. The analytical lab reports are provided in Appendix 1.

## 6.0 Former Coal Storage Area Soil Removal Activity

The former coal storage area is located on the west side of the plant building. The area was excavated in October 2004 by Cone Mills to the extent practical but was limited due to interferences. The excavation was approximately two to four feet in width and approximately seven feet in length and approximately 10 inches deep. Confirmation sampling indicated PCB remained at a concentration

of 2.7 ppm at the base of the excavation and up to 11 ppm in areas adjacent to the excavation.

Duke collected a total of 19 soil samples in the Former Coal Storage Area during the third and fourth quarter 2006. The plant building to the east, the railroad trestle to the west, extensive areas of debris, concrete pads and layers of gravel and coal limited sampling locations.

Analytical results indicated that twelve of the 19 samples collected from the Former Coal Storage Area contained PCB at a concentration above 1 ppm. The maximum PCB concentration detected in the Former Coal Storage Area was 96.2 ppm.

## 6.1 Soil Removal Area

For the purposes of the soil removal action, the Former Coal Storage Area was divided into two sections based on the depths of PCB contamination, and the PCB concentrations in the investigation samples.

Prior to starting soil removal activities an asbestos removal was completed on the piping in the area. Also, a railroad trestle and exposed piping were removed and set aside for disposal by US Finishing. Some of the piping contained oil, which was collected in drums and turned over to US Finishing for disposal. Exposed pipe ends were capped to prevent oil leaks.

Railroad tracks and ties were encountered at a depth of approximately 18 inches. These items were removed as needed during excavation activities. Concrete pipe chases and sumps located in this area were not removed.

Figure 6 shows the planned Coal Storage Area excavation areas and the investigation sample locations; Table 2 is the site investigation analytical summary table for this area. The actual excavation areas along with the confirmation sample locations are shown in Figure 9; Table 4 summarizes the confirmation samples analytical results. Photographs of the excavation are provided in Appendix 2.

Section L had a planned area of excavation of approximately 1200 ft<sup>2</sup> and was the part of the Former Coal Storage Area closest to the mill building. The initial depth of the planned excavation was one foot. The maximum PCB concentration detected in this area during the site investigation was 3.4 pm.

The depth of the excavation for Section L varied between 1.5 feet and 2 feet depending on the coal material encountered. The horizontal extent of the excavation did not change from the planned excavation. The mill building limited excavation to the east.

The majority of Section M was located under the railroad trestle. The removal of the trestle was completed before the PCB soil removal action. The planned area of excavation was approximately 1800 ft<sup>2</sup>. The excavation depth went to the bottom of a coal layer that varied between three and five feet below the original grade. A retaining wall limited the excavation to the west. The Silo, several pipe chases and equipment foundations also limited the excavation. Other concrete pads were removed to allow access to the soil underneath.

The excavation was expanded to include the area behind the Silo because two surface soil samples, OPHA-SU010 and OPHA-SU011 did not meet the cleanup goal. This additional area was excavated to a depth of one foot. This extent of the excavation for this area was also limited by the retaining wall, the Silo foundation and a pipe chase.

## 6.2 Confirmation Samples

A total of eight confirmation samples were collected for Section L. Seven of the samples were collected from the bottom of the excavation at depths between 1.5 and 2 feet. One sample was collected from surface soil along the north perimeter of the excavation. Results for all of the confirmation samples met the cleanup standard. One sample from the site investigation that also met the cleanup goal was used as a confirmation sample along the southern perimeter of the excavation.

A total of ten confirmation samples were collected for Section M. Nine of the samples were collected from the bottom of the excavation that varied in depth from one foot to five feet. One sample was collected from surface soil along the north perimeter of the excavation. Results for all of the confirmation samples met the cleanup standard.

A summary table of the confirmation sample analytical results is provided in Table 4. The analytical lab reports are provided in Appendix 1.

## 7.0 Northern Reservoir Soil Removal

The Northern Reservoir is a man-made process water retention pond. Water was pumped from Langston Creek to the Northern Reservoir. There is no natural water source to the pond other than the minor amount of water received through direct precipitation and overland flow from a very small drainage area. Previous investigations detected PCB in fish tissue but not in the sediment. With the closing of the mill, the pond was no longer needed and US Finishing drained the water from the pond.

A site investigation completed by Duke detected PCB at a concentration of three ppm at one soil boring at a depth between one and two feet. Analytical results for the samples collected at that boring from depths of three, four and five feet were below the cleanup standard. PCB was not detected above the cleanup standard in any other borings.

## 7.1 Soil Removal Area

Section N was located near the structure that discharged water from Langston Creek to the Northern Reservoir. The planned area of excavation was approximately 150 ft<sup>2</sup> with a depth of two feet. The planned area was excavated to a depth between 2.5 and 3 feet. Additional excavation was not required.

The Northern Reservoir excavation area and sample locations are shown in Figure 10. Photographs of the excavation are provided in Appendix 2.

## 7.2 Confirmation Samples

Four confirmation samples were collected for Section N. Samples were collected from the sidewall in each quadrant at a depth of one to two feet. Analytical results for the confirmation samples were below the standard of one ppm.

A summary table of the confirmation sample analytical results is provided in Table 4. The analytical lab reports are provided in Appendix 1.

## 8.0 Generic Site Activities

This section deals with issues applicable to all of the excavations at the site. Envirotech Environmental Services performed site excavation activities. The site manager's field notes are provided in Appendix 3.

### 8.1 Material Preparation

Screening of the soil to remove debris was not performed. Debris from removing the railroad trestle and piping was set aside for disposal by US Finishing.

Excavated material was placed directly into trucks. Soil stockpiles were not used.

## 8.2 Backfilling Excavations

Excavations were backfilled as soon as practical. Clean fill was utilized for backfill. The backfill was sampled to verify it was clean. Analytical results are provided in Appendix 4. Approximately 1850 tons of backfill was brought to the site. Excavations in roadways were topped with gravel. Grass seed was placed on other excavated areas.

## 8.3 Dust Control

The generation of excess dust was not a problem at this site. Controlling the dust with a water spray was not needed. A dust monitor was utilized, as needed, to determine dust concentrations in excavation areas.

## 8.4 Material Disposal

Material contaminated at a PCB concentration of less than 30 ppm was placed at Waste Management's Palmetto Landfill, Spartanburg, SC. Material contaminated at a PCB concentration greater than 30 ppm was placed at Waste Management's Hazardous Waste Landfill in Emelle, Alabama. Approximately 1915 tons of material was sent to the Palmetto Landfill and 330 tons of material was sent to the Emelle Landfill. Manifests are provided in Appendix 5.

## 8.5 Surveying

Excavation areas and sample points were surveyed to determine locations. Survey data sheets are provided in Appendix 6.

## 8.6 Monitoring Wells

No monitoring wells were removed or damaged during this soil removal project.

## 9.0 Additional Site Activities

There were several activities detailed in either the *Investigation Work Plan* or the *Northern Reservoir Investigation Work plan* that had not been completed by the time the site investigation field activities concluded. These activities included a sediment sample, approximately half the samples in the Northern Reservoir and a groundwater sample. Therefore these activities were included in the *PCB Soil Removal Plan*.

## 9.1 Sediment Sample

Sediment sample SED-1 was collected September 6, 2006 from Langston Creek at the Brooks Avenue Bridge. The PCB analytical results for that sample were below the detection limit of 0.363 ppm. This detection limit significantly exceeds the 0.03 ppm standard. Therefore, that location was re-sampled on August 21, 2007 and analyzed for PCB, in an attempt to achieve an improved detection limit. The new sample analytical result for PCB was below the detection limit of 0.043 ppm for each aroclor. The analytical lab report is provided in Appendix 7.

## 9.2 Northern Reservoir Samples

The *Cone Mills Site Duke Energy Corporation Northern Reservoir Investigation Work Plan* specified 14 sample locations. The reservoir is in the process of being drained of water. Soil samples were collected from seven (NR-1 through NR-6 and NR-11) locations November 11, 2006. The remaining samples were not collected at that time because the locations were still under water.

The additional Northern Reservoir samples were collected May 30, 2007. Samples were collected using a hand auger and following the procedures detailed in the *Cone Mills Site Duke Energy Corporation Northern Reservoir Investigation Work Plan*. The samples were analyzed for PCB following EPA procedure 8082. Analytical results were below the cleanup standard for all of the samples. No additional area requiring soil removal was identified. Table 5 is a summary table of the additional Northern Reservoir Investigation Samples. The analytical lab report is provided in Appendix 8.

## 9.3 Groundwater Monitoring Well

As specified in The *Cone Mills Site Duke Energy Corporation Investigation Work Plan* at the completion of the soil removal action, a permit was requested from DHEC to allow Duke to collect one groundwater sample. Duke collected the sample July 17, 2007. The sample was collected at the water table using a geoprobe sampling system from the vicinity of investigation sample SS-27, the location with the highest PCB concentration (276 ppm) in the soil. The sample was analyzed for PCB by a DHEC certified laboratory.

Analytical results were below the detection limit for PCB. The analytical lab report is provided in Appendix 9.

## 10.0 Conclusion

DHEC acceptance of this report will complete Duke Energy's obligations detailed in the Consent Decree.

## TABLES

TABLE 1  
 SITE INVESTIGATION ANALYTICAL RESULTS  
 SUMMARY TABLE  
 SUBSTATION AREA

Location	Results mg/kg Aroclor	
	1248	1254
SS-1	ND	0.8
SS-2	ND	0.4
SS-3	ND	<b>2.3</b>
SS-4	ND	<b>14.1</b>
SS-5	ND	<b>16.9</b>
SS-6	ND	<b>6.6</b>
SS-7	ND	<b>5.4</b>
SS-8	ND	0.7
SS-9	ND	<b>8.6</b>
SS-10	ND	0.4
SS-11	ND	ND
SS-12	ND	<b>12.0</b>
SS-13	ND	1.0
SS-14	ND	<b>4.0</b>
SS-15	ND	<b>10.1</b>
SS-16	ND	<b>11.4</b>
SS-17	ND	<b>267</b>
SS-18	ND	<b>22.9</b>
SS-19	ND	ND
SS-20	ND	<b>137</b>
SS-21	ND	<b>81.2</b>
SS-22	ND	ND
SS-23	ND	<b>77.4</b>
SS-24	ND	<b>16.6</b>
SS-25	ND	0.6
SS-26	ND	<b>18.7</b>
SS-27	ND	<b>108</b>
SS-28	ND	<b>4.1</b>
SS-29	ND	<b>4.0</b>
SS-30	ND	<b>2.2</b>
SS-31	<b>59.5</b>	ND
SS-32	ND	0.4
SS-33	ND	0.9
SS-34	ND	0.3
SS-35	<b>1.3</b>	0.9
SS-36	ND	0.5
SS-37	ND	ND
SS-38	ND	ND

Location	Results mg/kg Aroclor	
	1248	1254
SS-39	ND	0.1
SS-40	<b>85.3</b>	ND
SS-41	<b>15.0</b>	ND
SS-42	<b>96.2</b>	ND
SS-43	ND	<b>2.0</b>
SS-44	<b>37.9</b>	ND
SS-45	0.4	ND
SS-46	<b>1.8</b>	ND
SS-47	ND	0.6
SS-48	ND	0.6
SS-49	ND	ND
SS-50	ND	ND
SS-51	ND	0.0
SS-52	<b>2.9</b>	<b>1.4</b>
SS-53	ND	<b>8.5</b>
SS-54	ND	ND
SS-55	ND	0.6
SS-56	ND	<b>1.2</b>
SS-57	ND	<b>1.2</b>
SS-58	ND	<b>7.2</b>
SS-59	ND	0.2
SS-60	ND	0.2
SS-61	ND	0.6
SS-62	ND	<b>7.1</b>
SS-63	ND	0.2
SS-64	ND	0.1
SS-65	ND	<b>4.1</b>
SS-66	ND	<b>6.0</b>
SS-67	ND	0.2
SS-68	ND	<b>1.5</b>
SS-69	ND	0.6
SS-70	ND	<b>5.2</b>
SS-71	ND	0.6
SS-72	ND	<b>1.6</b>
SS-73	ND	ND
SS-74	ND	0.3
SS-75	ND	ND
SS-76	ND	0.2



TABLE 3  
 SITE INVESTIGATION ANALYTICAL RESULTS  
 SUMMARY TABLE  
 NORTHERN RESERVOIR, SEDIMENT SAMPLES

Sediment Samples

Location	Results mg/kg Aroclor	
	1248	1254
SED-1	<0.363	<0.363
SED-2	<0.041	<0.041
SED-3	<0.038	<0.038
SED-4	<0.035	<0.035
SED-5	<0.040	<0.040
SED-6	<0.039	<0.039
SED-7	<0.037	<0.037
SED-8	<0.038	<0.038
SED-9	<0.047	<0.047
SED-10	<0.058	<0.058
SED-11	<0.038	<0.038
SED-12	<0.227	<0.227
SED-13	<0.038	<0.038
SED-14	<0.242	<0.242

Northern Reservoir

Location	Results mg/kg Aroclor	
	1248	1254
NR-1-0-4	ND	0.34
NR-1-4-1	ND	0.07
NR-1-1-2	ND	<b>2.96</b>
NR-1-2-3	ND	ND
NR-1-3-4	ND	0.76
NR-1-4-5	ND	ND
NR-2-0-4	ND	0.16
NR-2-4-1	ND	0.34
NR-2-1-2	ND	0.29
NR-2-2-3	ND	0.18
NR-2-3-4	ND	0.09
NR-2-4-5	ND	ND
NR-3-0-4	ND	0.16
NR-3-4-1	ND	ND
NR-3-1-2	ND	ND
NR-3-2-3	0.10	0.09
NR-3-3-4	ND	0.24
NR-3-4-5	ND	ND
NR-3-5-6	ND	ND
NR-4-0-4	ND	0.25
NR-4-4-1	ND	ND
NR-4-1-2	ND	ND
NR-4-2-3	ND	ND
NR-4-3-4	ND	0.04
NR-4-4-5	ND	ND
NR-5-0-4	ND	0.27
NR-5-4-1	ND	0.16
NR-5-1-2	ND	ND
NR-5-2-3	ND	0.07
NR-5-3-4	ND	ND
NR-6-0-4	ND	ND
NR-6-4-1	ND	ND
NR-6-1-2	ND	ND
NR-6-2-3	ND	ND
NR-11-0-4	ND	ND
NR-11-4-1	ND	ND



TABLE 4

ANALYTICAL RESULTS SUMMARY TABLE  
CONFIRMATION SAMPLES

Location	Depth	Date	Results (mg/kg) Aroclor		
			1248	1254	1260
COM-B001	6"	5/22/2007	ND	ND	ND
COM-B-002	6"	5/22/2007	9.7	ND	ND
COM-C001	6"	5/22/2007	ND	2.4	ND
COM-C002	6"	5/22/2007	ND	1.3	ND
COM-D001	6"	5/22/2007	ND	10	ND
COM-D002	6"	5/22/2007	ND	3.1	ND
CSA-L-B013	2'	5/22/2007	ND	ND	ND
CSA-L-B014	1' 6"	5/22/2007	ND	0.71	ND
CSA-L-B015	2'	5/22/2007	ND	ND	ND
CSA-L-B016	1' 6"	5/22/2007	ND	0.37	ND
CSA-L-B017	1' 6"	5/22/2007	ND	0.24	ND
CSA-L-B018	1' 6"	5/22/2007	ND	0.31	ND
CSA-L-B019	1' 6"	5/22/2007	ND	0.21	ND
CSA-M-B020	5'	5/22/2007	ND	ND	ND
CSA-M-B021	5'	5/22/2007	ND	ND	ND
CSA-M-B022	5'	5/22/2007	ND	ND	ND
CSA-M-B023	4'	5/22/2007	ND	ND	ND
CSA-M-B024	4'	5/22/2007	ND	ND	ND
CSA-M-B025	3'	5/22/2007	ND	ND	ND
CSA-M-B026	3'	5/22/2007	ND	ND	ND
CSA-M-B027	3'	5/22/2007	ND	ND	ND
CSA-L-SU028	Surface	5/22/2007	ND	ND	ND
CSA-M-SU029	Surface	5/22/2007	ND	0.56	ND
CSA-M-B082	1'	5/30/2007	ND	0.29	ND
NR-SW-089	1'-2'	5/31/2007	ND	ND	ND
NR-SW-090	1'-2'	5/31/2007	ND	ND	ND
NR-SW-091	1'-2'	5/31/2007	ND	ND	ND
NR-SW-092	1'-2'	5/31/2007	ND	0.2	ND
OPHA-I-B001	1'	5/16/2007	ND	ND	ND
OPHA-I-B002	1'	5/16/2007	ND	ND	ND
OPHA-J-B004	1'	5/16/2007	ND	ND	ND
OPHA-J-B005	1'	5/16/2007	ND	ND	ND
OPHA-J-B006	1'	5/16/2007	ND	ND	ND
OPHA-J-SU003	Surface	5/16/2007	ND	0.093	ND
OPHA-K-B007	1'	5/16/2007	ND	ND	ND
OPHA-K-B008	1'	5/16/2007	ND	0.11	ND
OPHA-K-SU009	~4" (Surface)	5/16/2007	ND	0.17	ND
OPHA-SU010	~4" (Surface)	5/16/2007	ND	17	ND
OPHA-SU011	~4" (Surface)	5/16/2007	ND	4.3	ND
PMT-F-B076	2'	5/29/2007	ND	ND	ND
PMT-F-B077	2'	5/29/2007	ND	0.11	ND
PMT-G-B075	2'	5/29/2007	ND	ND	ND
PMT-H-B078	1'	5/29/2007	ND	ND	ND

Location	Depth	Date	Results (mg/kg) Aroclor		
			1248	1254	1260
PMT-F-SU080	Surface	5/29/2007	ND	0.3	ND
PMT-F-SU081	Surface	5/29/2007	ND	0.61	ND
SS-A-B070	1'	5/29/2007	ND	0.33	ND
SS-A-B071	1'	5/29/2007	ND	0.44	ND
SS-A-B062	1'	5/29/2007	ND	0.38	ND
SS-A-B063	1'	5/29/2007	ND	0.075	ND
SS-A-B064	1'	5/29/2007	ND	0.32	ND
SS-A-B065	1'	5/29/2007	ND	ND	ND
SS-A-B066	1'	5/29/2007	ND	0.4	ND
SS-A-B069	1'	5/29/2007	ND	0.043	ND
SS-A-B073	1'	5/29/2007	ND	ND	ND
SS-A-B074	1'	5/29/2007	ND	0.055	ND
SS-A-B097	2'	6/6/2007	ND	0.073	ND
SS-A-B112	2'	6/15/2007	ND	0.29	ND
SS-A-B113	2'	6/15/2007	ND	0.26	ND
SS-A-SU095	2'	6/1/2007	ND	6.1	ND
SS-A-SU072	Surface	5/29/2007	ND	3.5	ND
SS-A-SU098	Surface	6/6/2007	ND	2.2	ND
SS-A-SU099	Surface	6/6/2007	ND	3.6	ND
SS-A-SU102	Surface	6/6/2007	ND	0.15	ND
SS-A-SU103	Surface	6/6/2007	ND	0.063	ND
SS-A-SU104	Surface	6/11/2007	ND	0.44	ND
SS-A-SU105	Surface	6/11/2007	ND	0.16	ND
SS-A-B106	2'	6/11/2007	ND	ND	ND
SS-A-B107	2'	6/11/2007	ND	ND	ND
SS-A-SU108	Surface	6/11/2007	ND	3.2	ND
SS-A-SU109	Surface	6/15/2007	ND	ND	ND
SS-A-SU110	Surface	6/15/2007	ND	ND	ND
SS-A-SU111	Surface	6/15/2007	ND	0.51	ND
SS-B-B060	1'	5/29/2007	ND	0.18	ND
SS-B-B061	1'	5/29/2007	ND	ND	ND
SS-B-B067	1"	5/29/2007	ND	0.44	ND
SS-B-B079	1'	5/29/2007	ND	0.16	ND
SS-B-SU068	Surface	5/29/2007	ND	0.16	ND
SS-C-B048	2'	5/29/2007	ND	ND	ND
SS-C-B049	2'	5/29/2007	ND	1.3	ND
SS-C-B050	2'	5/29/2007	ND	ND	ND
SS-C-B051	2'	5/29/2007	ND	ND	ND
SS-C-B052	2'	5/29/2007	ND	0.24	ND
SS-C-B053	2'	5/29/2007	ND	53	ND
SS-C-B055	2'	5/29/2007	ND	ND	ND
SS-C-B056	2'	5/29/2007	ND	ND	ND
SS-C-B093	4'	6/1/2007	ND	0.53	ND
SS-C-B094	4'	6/1/2007	ND	ND	ND
SS-C-SU054	Surface	5/29/2007	ND	ND	ND
SS-C-SU057	Surface	5/29/2007	ND	ND	ND
SS-D-B058	6'	5/29/2007	ND	ND	ND
SS-D-B059	6'	5/29/2007	ND	1.6	ND
SS-D-B096	8'	6/1/2007	ND	ND	ND

Location	Depth	Date	Results (mg/kg) Aroclor		
			1248	1254	1260
SS-D-B100	2'	6/6/2007	ND	ND	ND
SS-D-B101	2'	6/6/2007	ND	ND	ND
SS-E-B030	1'	5/24/2007	ND	2	ND
SS-E-B031	1'	5/24/2007	ND	ND	ND
SS-E-B032	1'	5/24/2007	ND	17	ND
SS-E-B033	1'	5/24/2007	ND	17	ND
SS-E-B035	1'	5/24/2007	ND	0.33	ND
SS-E-B036	1'	5/24/2007	ND	ND	ND
SS-E-B037	1'	5/24/2007	ND	0.47	ND
SS-E-B038	1'	5/24/2007	ND	0.51	ND
SS-E-B039	1'	5/24/2007	ND	8.6	ND
SS-E-B040	1'	5/24/2007	ND	ND	ND
SS-E-B041	1'	5/24/2007	ND	0.25	ND
SS-E-B042	1'	5/24/2007	ND	34	ND
SS-E-B043	1'	5/24/2007	ND	4	ND
SS-E-B044	1'	5/24/2007	ND	0.32	ND
SS-E-B083	2'	5/30/2007	ND	ND	ND
SS-E-B084	2'	5/30/2007	ND	0.12	ND
SS-E-B085	2'	5/30/2007	ND	ND	ND
SS-E-B086	2'	5/30/2007	ND	ND	ND
SS-E-B087	2'	5/30/2007	ND	ND	ND
SS-E-B088	2'	5/30/2007	ND	0.068	ND
SS-E-SU034	Surface	5/24/2007	ND	ND	ND
SS-E-SU045	Surface	5/24/2007	ND	ND	ND
SS-E-SU046	Surface	5/24/2007	ND	ND	ND
SS-E-SU047	Surface	5/24/2007	ND	ND	ND

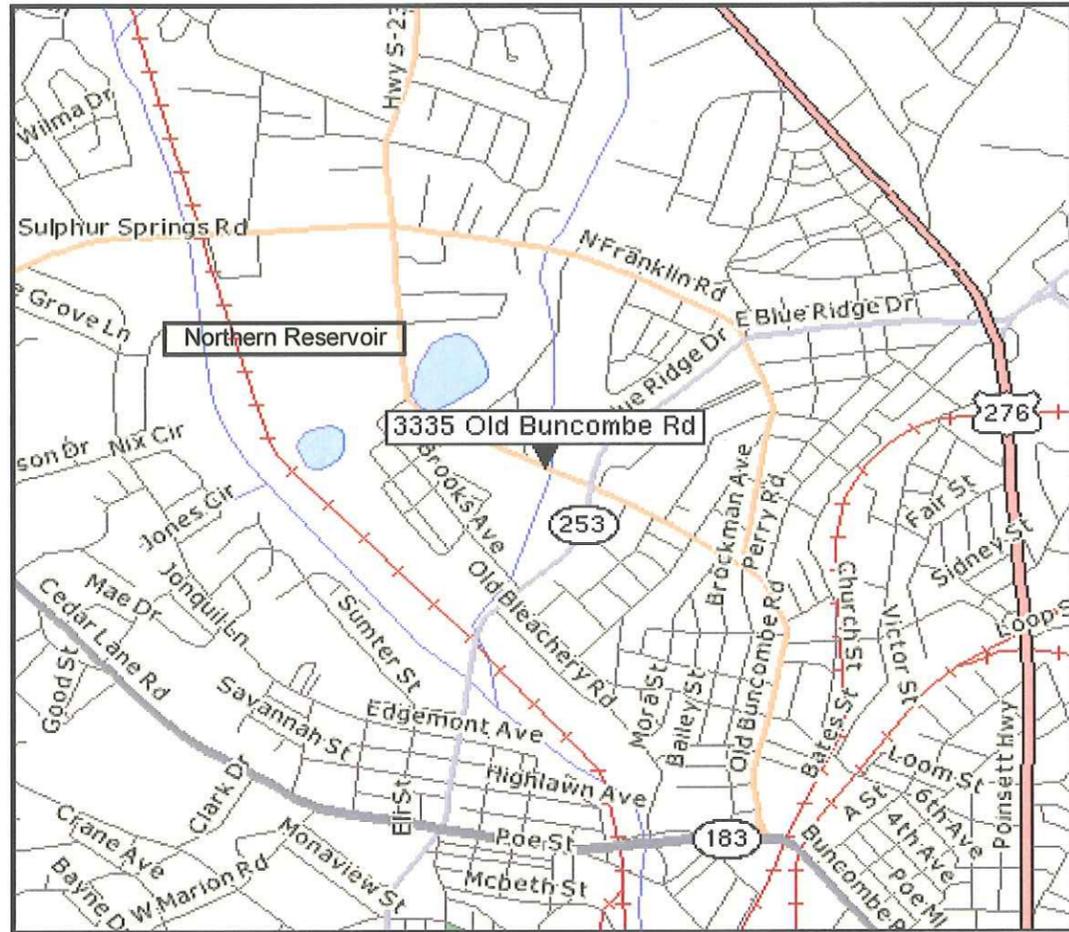
TABLE 5  
ANALYTICAL RESULTS  
SUMMARY TABLE  
NORTHERN RESERVOIR

Northern Reservoir

Location	Results mg/kg Aroclor	
	1248	1254
NR-14-0-4	ND	ND
NR-14-4-1	ND	ND
NR-14-1-2	ND	ND
NR-14-2-3	ND	ND
NR-13-0-4	ND	ND
NR-13-4-1	ND	ND
NR-13-1-2	ND	ND
NR-12-0-4	ND	ND
NR-12-4-1	ND	ND
NR-12-1-2	ND	ND
NR-10-0-4	ND	ND
NR-10-4-1	ND	ND
NR-9-0-4	ND	ND
NR-9-4-1	ND	ND
NR-7-0-4	ND	ND
NR-7-4-1	ND	ND

## FIGURES

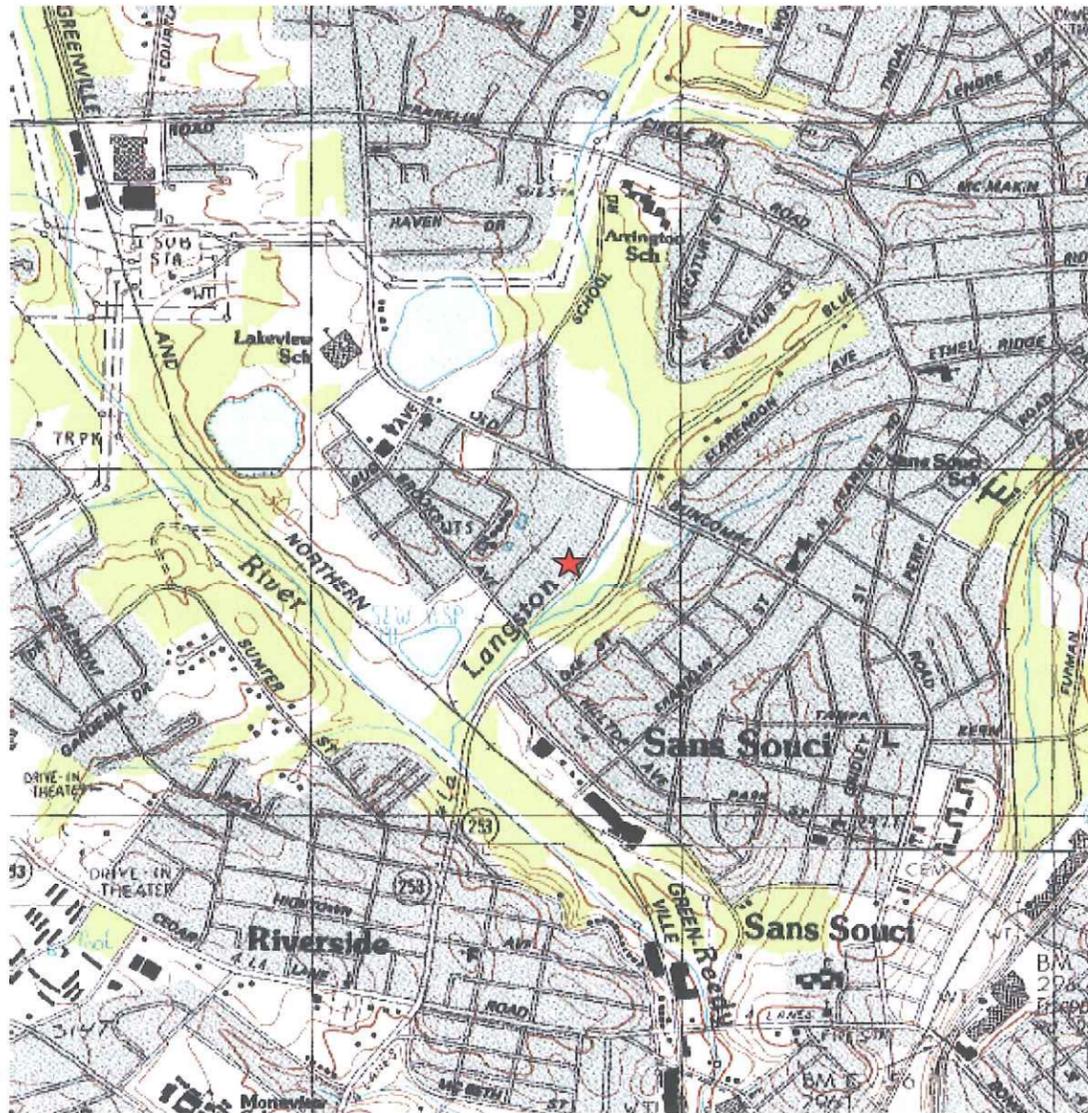
1  
2



0.4 MI 3335 OLD BUNCOMBE RD, GREENVILLE, SC

Map by [Maps On Us](#) (R)  
 ©1984-2005 TeleAtlas N.A.m., Switchboard. Use subject to [LICENSE](#).

<b>Duke Energy Company</b>
<b>Cone Mills Site</b>
Figure 1
Site Location



M=-5.848  
G=-0.816

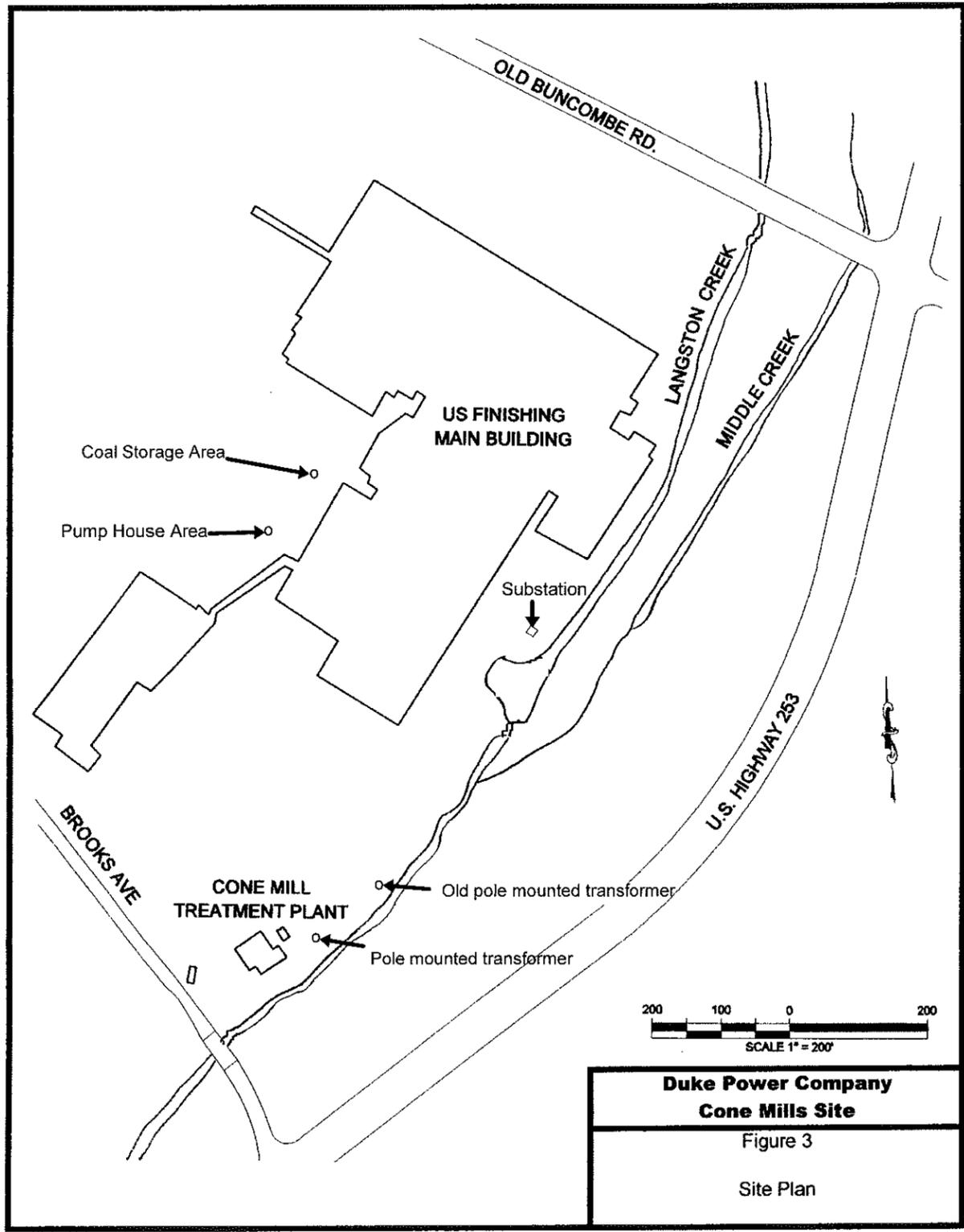
★ Substation Location

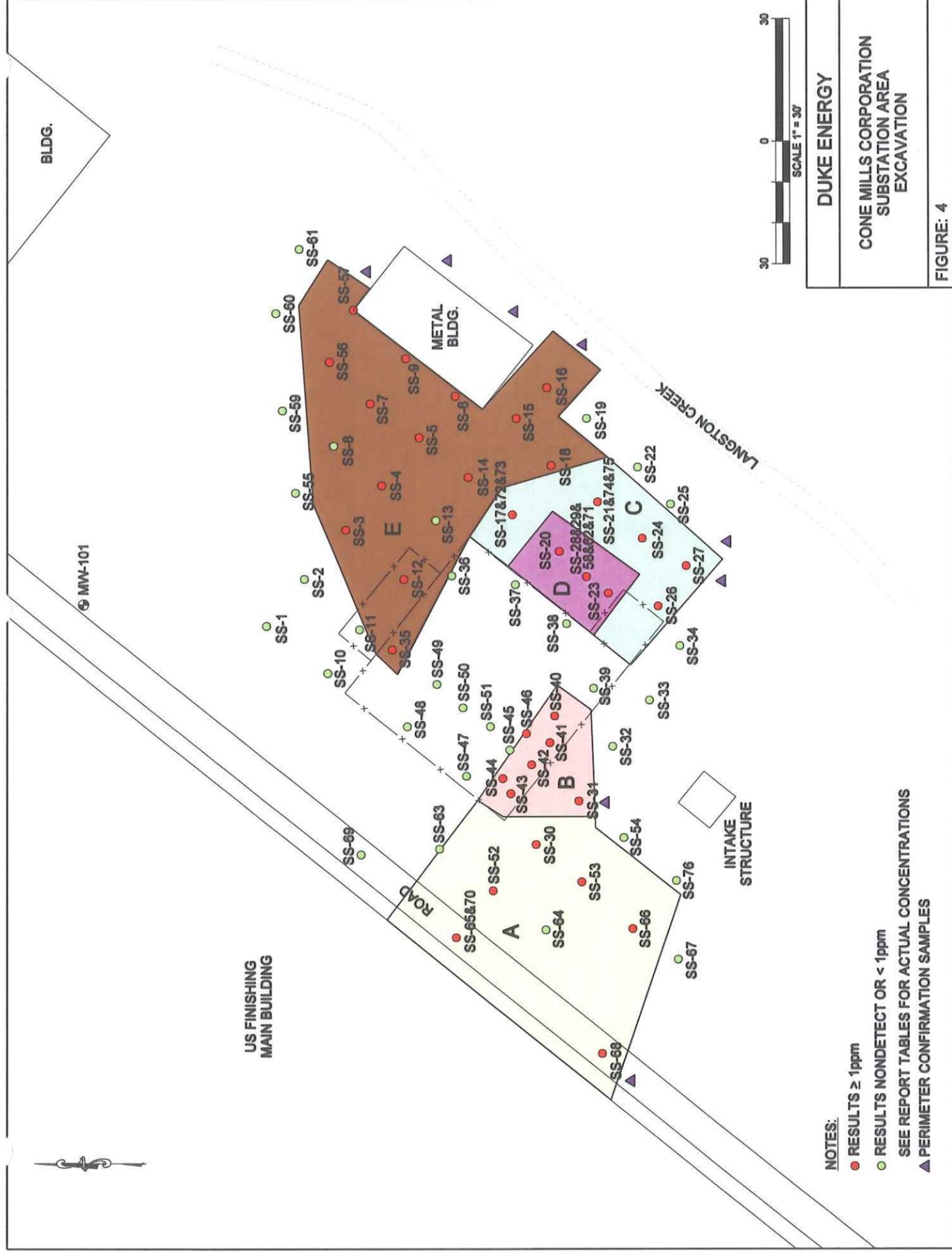
34° 52' 57"N, 82° 25' 34"W (WGS84/NAD83)  
Paris Mountain quadrangle  
Projection is UTM Zone 17 NAD83 Datum

**Duke Power Company  
Cone Mills Site**

Figure 2

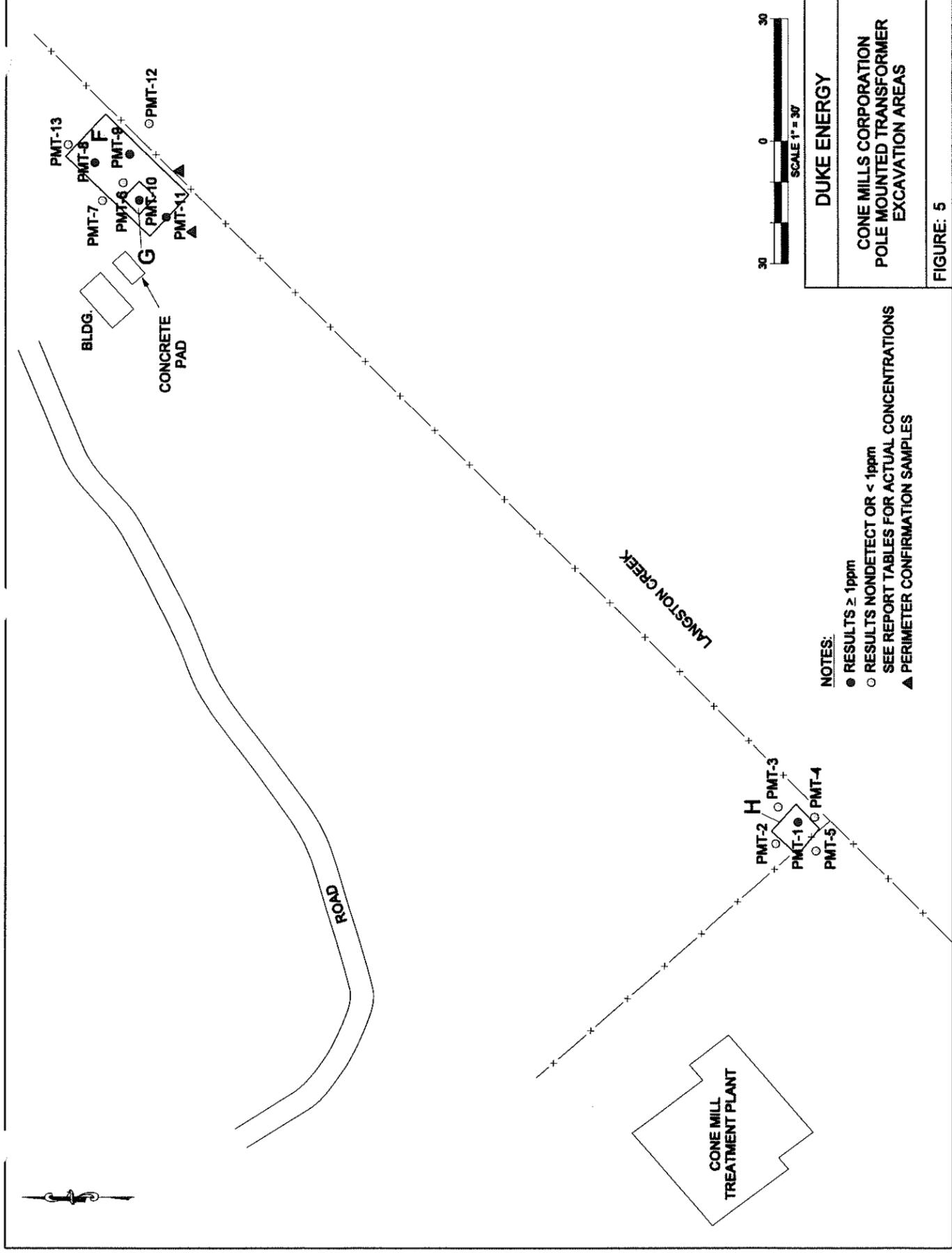
Topographic Map

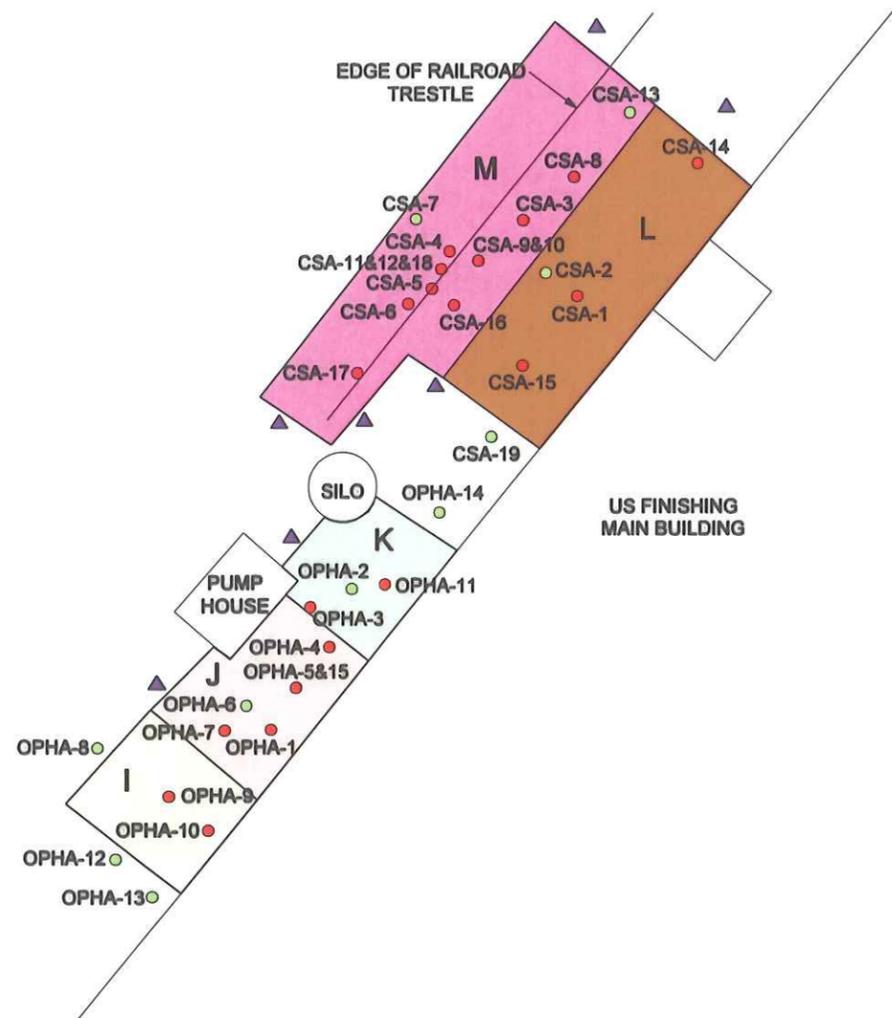




- NOTES:**
- RESULTS ≥ 1ppm
  - RESULTS NONDETECT OR < 1ppm
  - SEE REPORT TABLES FOR ACTUAL CONCENTRATIONS
  - ▲ PERIMETER CONFIRMATION SAMPLES

C:\DGN\usfinishing\sampleloc.dgn 1/29/2007 9:05:51 AM





**NOTES:**  
 ● RESULTS ≥ 1ppm  
 ○ RESULTS NONDETECT OR < 1ppm  
 SEE REPORT TABLES FOR ACTUAL CONCENTRATIONS  
 ▲ PERIMETER CONFIRMATION SAMPLES



**DUKE ENERGY**  
**CONE MILLS CORPORATION**  
**COAL STORAGE AREA &**  
**OIL PUMP HOUSE AREA**  
**EXCAVATION AREAS**

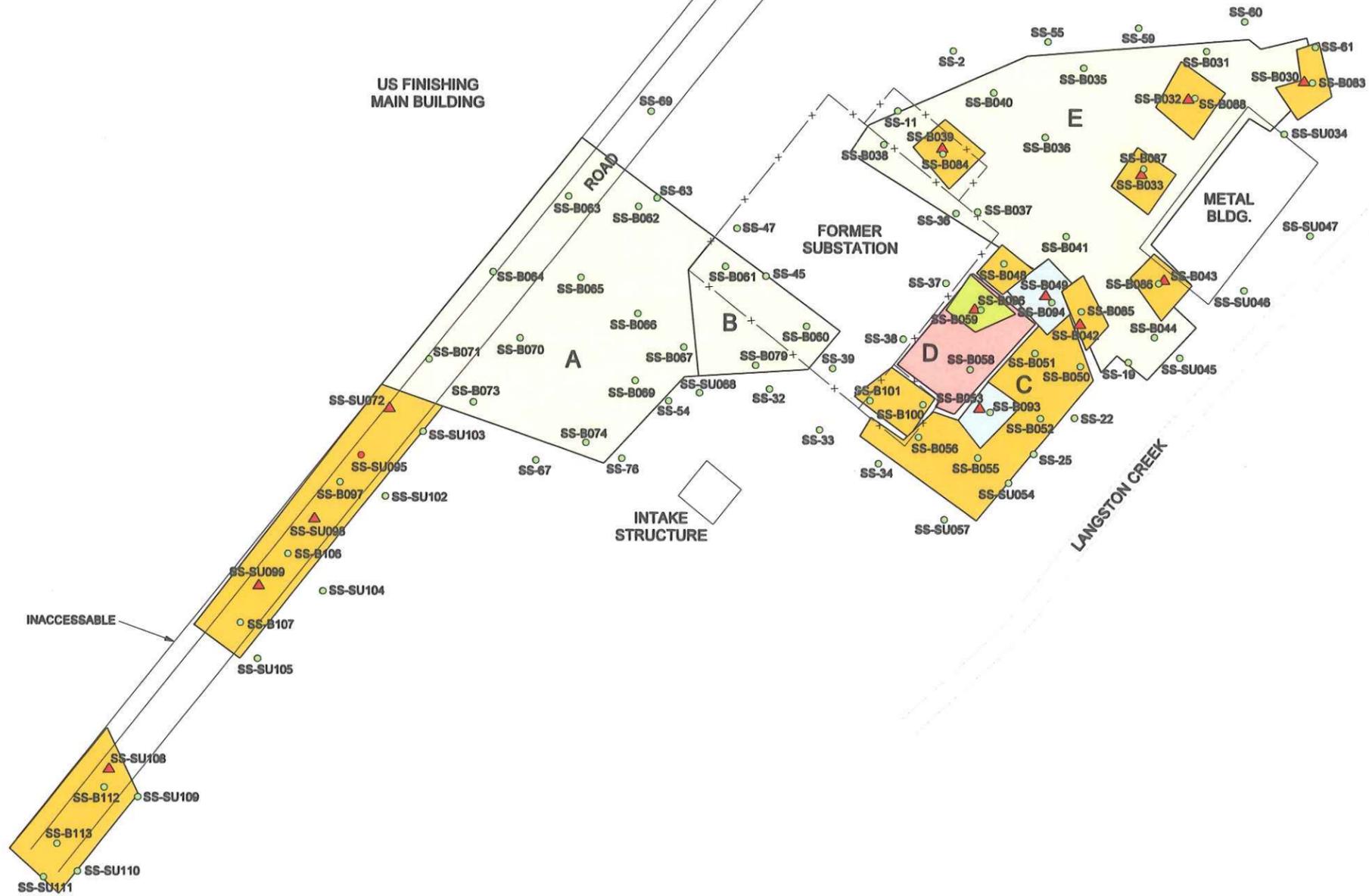
FIGURE: 6

**NOTES:**

- RESULTS NONDETECT OR < 1ppm
- RESULTS ≥ 1ppm
- ▲ RESULTS ≥ 1ppm LATER EXCAVATED  
SEE REPORT TABLES FOR ACTUAL CONCENTRATIONS

SS-47 INVESTIGATION SAMPLES

SS-B106 REMEDIATION SAMPLES  
SS-SU103



**APPROXIMATE EXCAVATION DEPTHS**

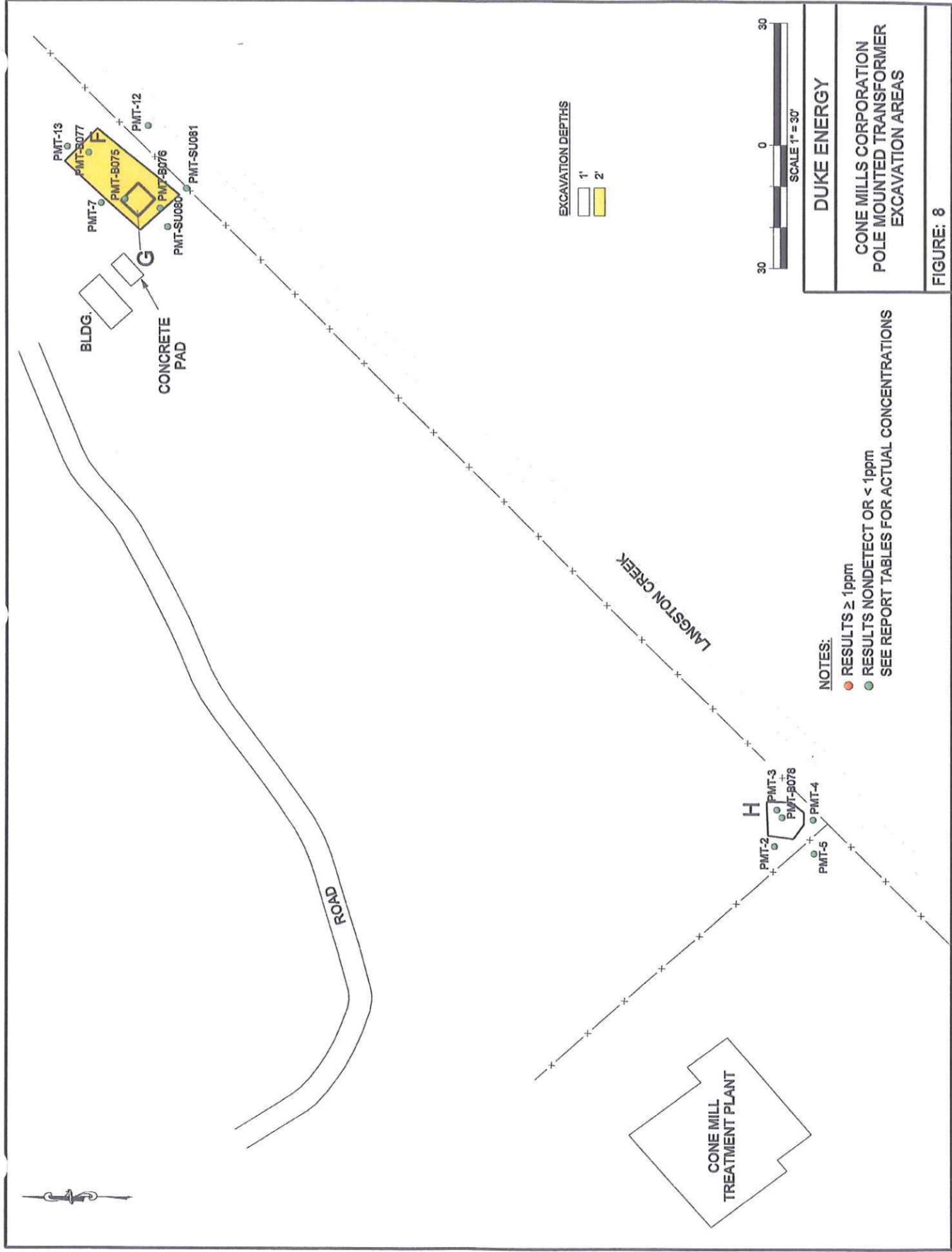
- 1'
- 2'
- 4'
- 6'
- 5'



**DUKE ENERGY**

**CONE MILLS CORPORATION  
SUBSTATION  
EXCAVATION AREAS**

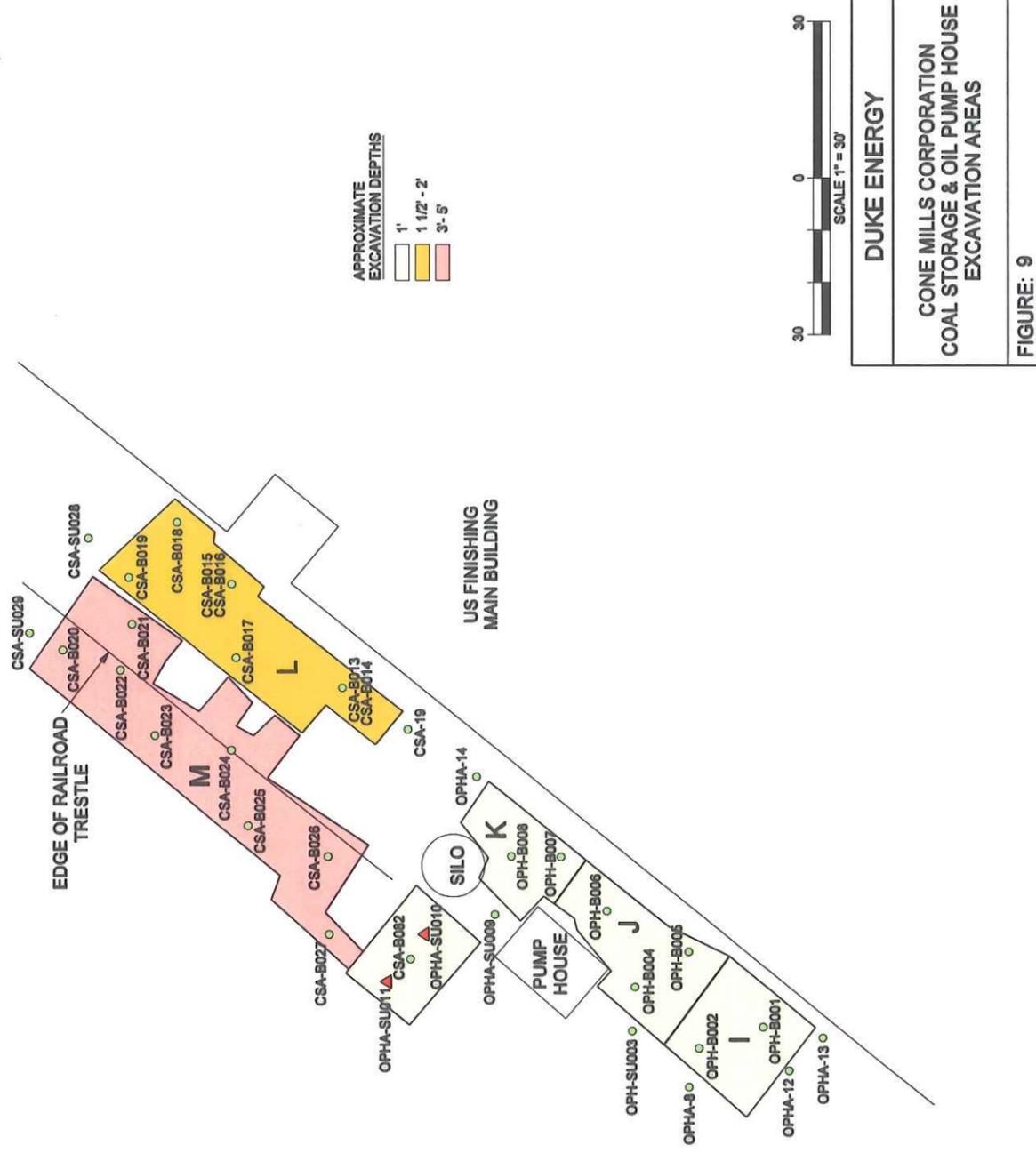
**FIGURE: 7**



C:\DGN\usfinishing\sampleloc.dgn 8/9/2007 3:08:55 PM

**NOTES:**

- RESULTS ≥ 1ppm
- RESULTS ND OR < 1ppm  
SEE REPORT TABLES FOR ACTUAL CONCENTRATIONS
- ▲ RESULTS ≥ 1ppm LATER EXCAVATED

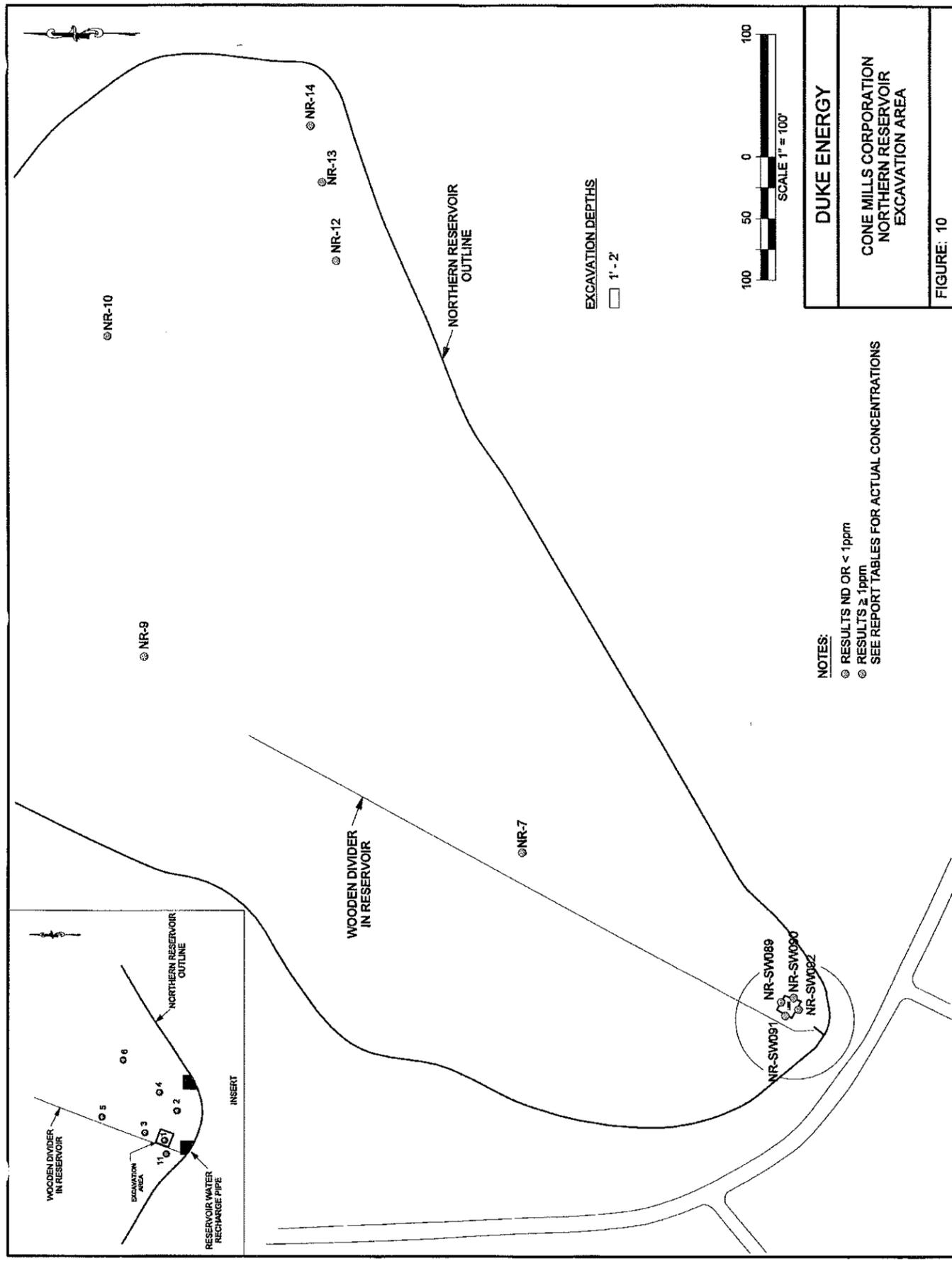


DUKE ENERGY

CONE MILLS CORPORATION  
COAL STORAGE & OIL PUMP HOUSE  
EXCAVATION AREAS

FIGURE: 9

c:\DGN\usfinishingsampleloc.dgn 8/14/2007 11:02:27 AM



C:\DGN\usfinshingsampleloc.dgn 8/10/2007 11:59:03 AM

**APPENDIX 2**  
**PHOTOGRAPHS**



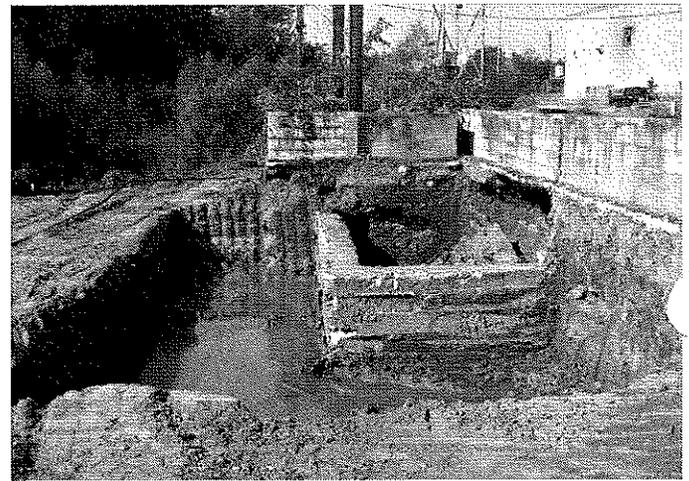
Substation Area Sect A



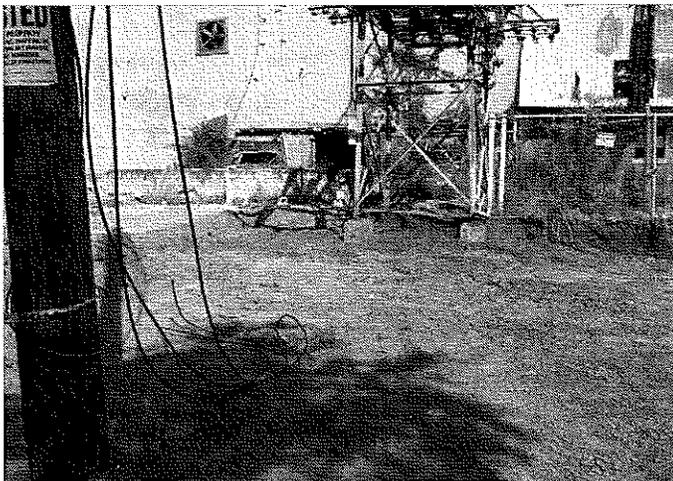
Substation Area Sect C



Substation Area Sect B



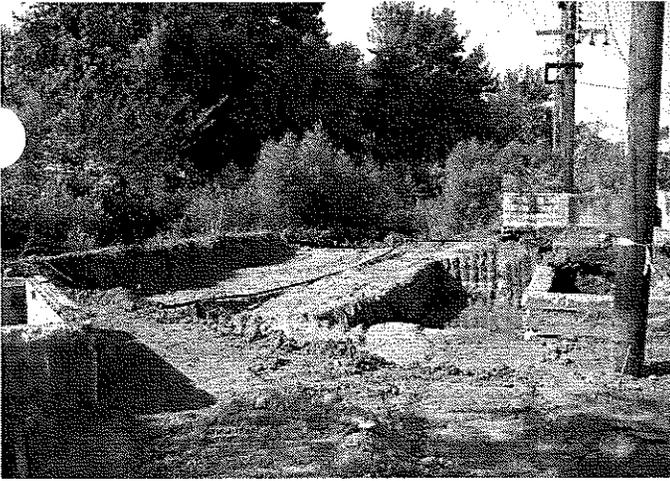
Substation Area Sect D



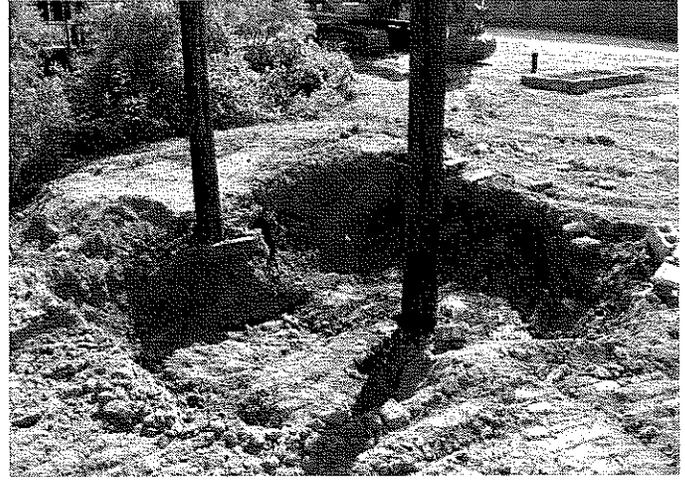
Substation Area Sect E



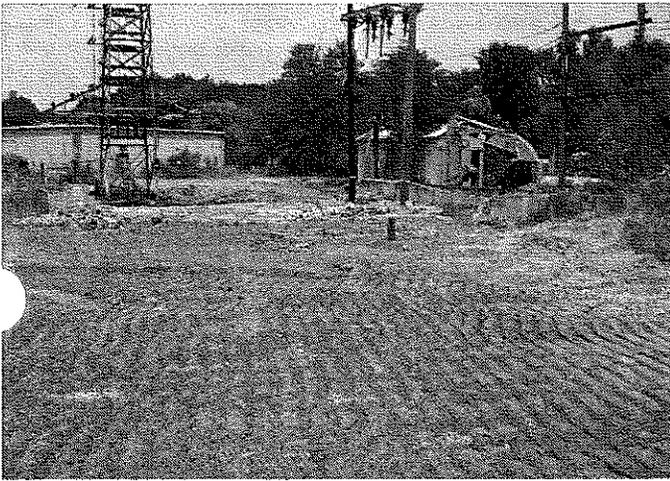
Substation Area Sect E



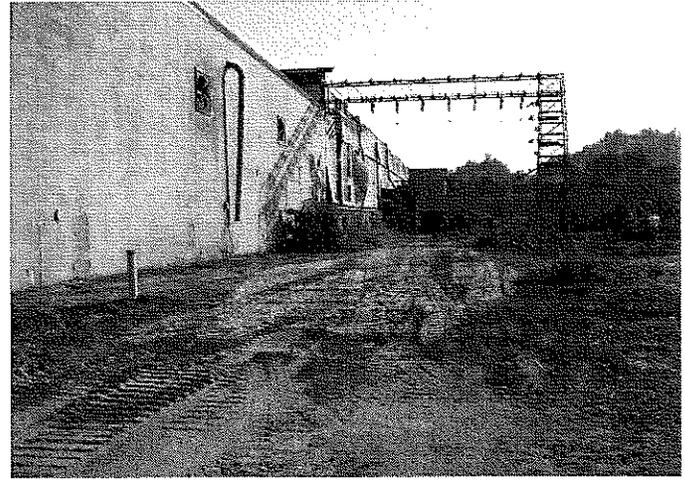
Substation Area Sect C/D



USF Substation Sect C



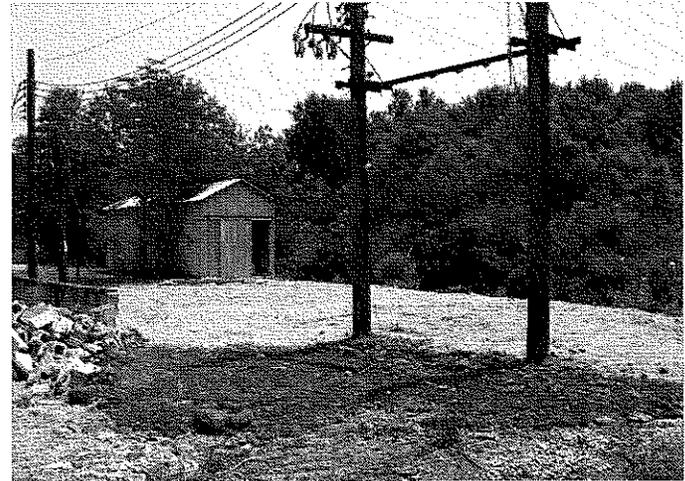
Substation Backfill Sect A/B



Substation Backfill Sect A



Substation Backfill Sect E



Substation Seed Sect D/C



PMT Area Sect F/G



PMT Area Sect H



Sect F/G Backfill



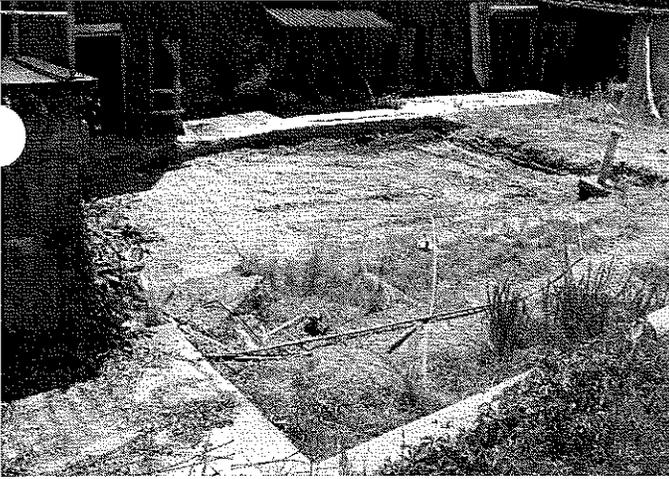
Sect H Backfill



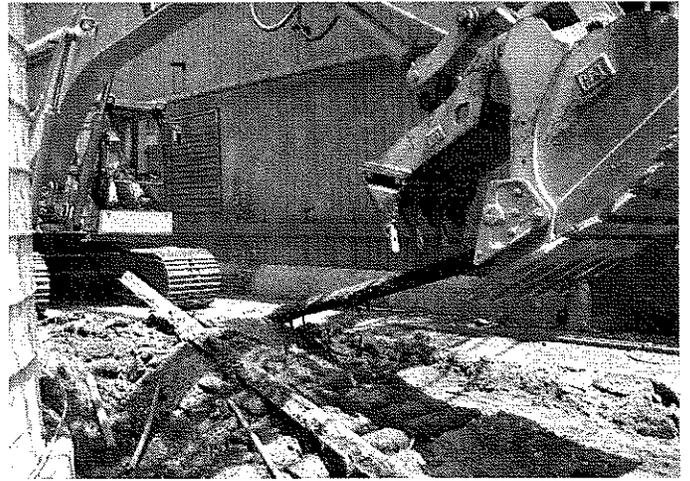
Sect F/G Seeded



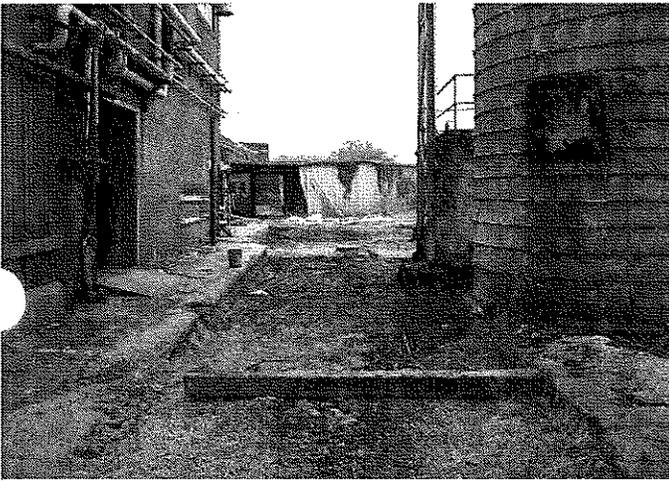
Sect H Seeded



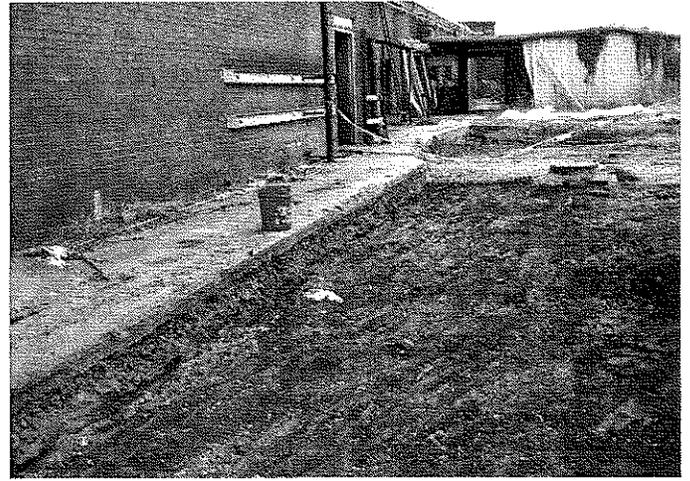
Oil Pump House Area Sect I/J



OPHA Sect K, Railroad ties



OPHA Sect K



OPHA Sect I/J/K



OPHA Sect K



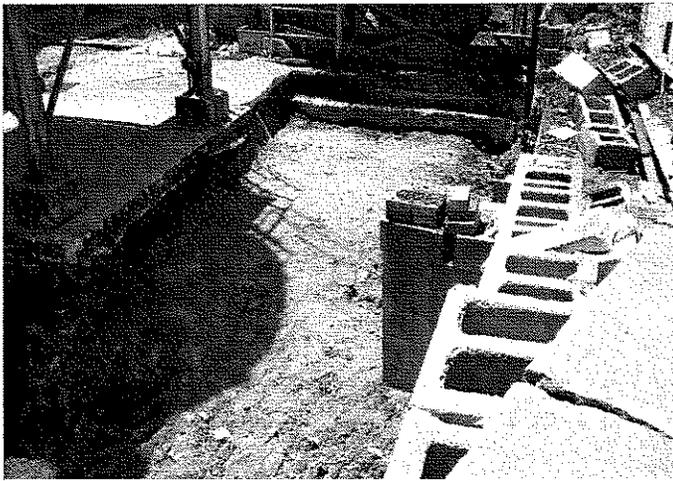
OPHA Sect I/J/K



Coal Storage Area Removed Debris



CSA Sect M Railroad Removal



CSA Sect M



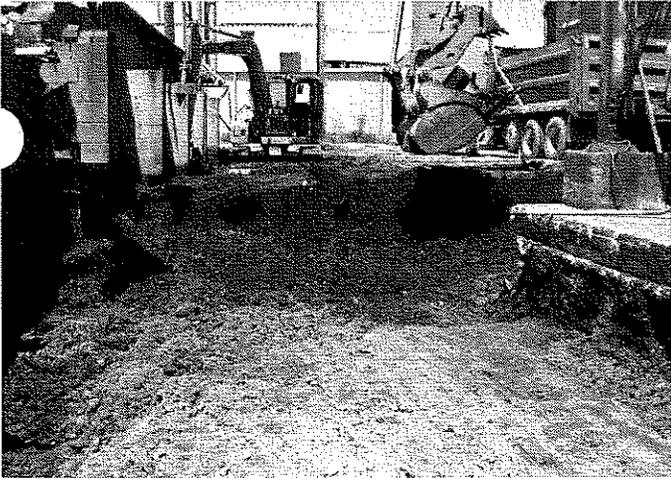
CSA Sect L



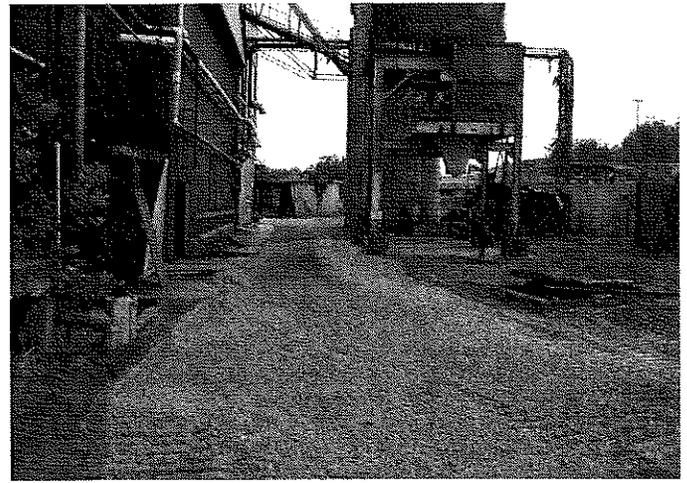
CSA Sect M



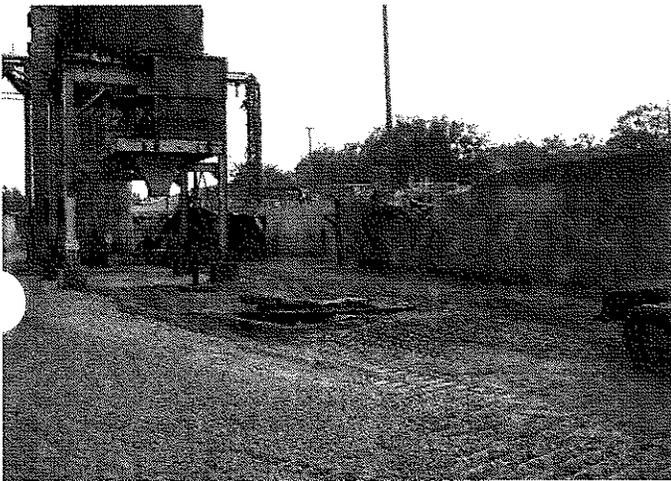
CSA Sect M



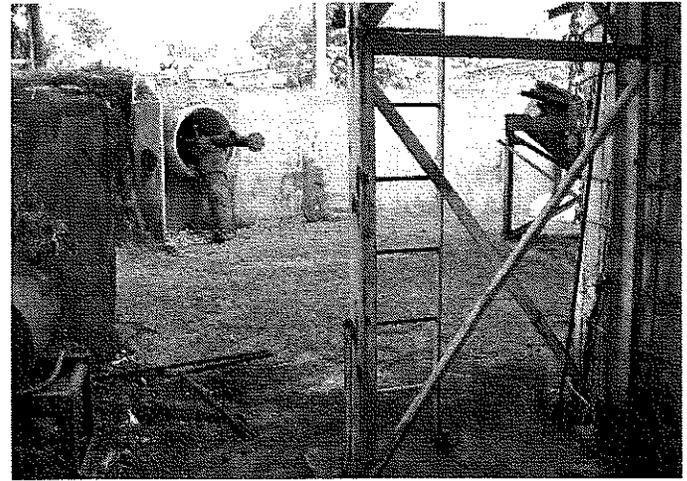
CSA Sect M



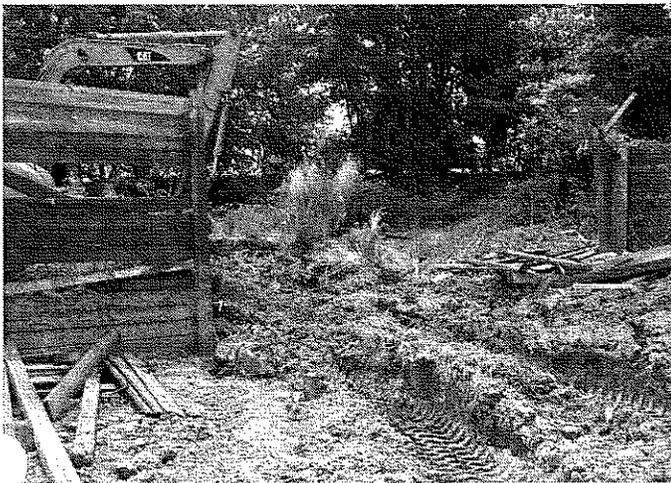
CSA Sect L/M Backfill



CSA Sect L/M Backfill



CSA Sect M Backfill



Northern Reservoir Sect N



Northern Reservoir Sect N

**APPENDIX 3**  
**FIELD NOTES**

5/7/07

US Finishings.  
Greenville, SC.

Load up all tools and equip  
to perform tasks.

Met site personnel on site.  
K. Ramsey, K. Cable, M. Stephens,  
D. Slaughter, J. Holcomb, P. Stepland.

Dusty and Patrick will be  
only performing non-intrusive  
tasks.

- Review and discuss the  
site specific health and  
safety plan.

- The front end loader has  
a flat rear tire. Contacted  
Blanchard for repair.

- We also have a 320 excavator  
with a hydraulic thumb.

- Laid out the site  
personnel prep/break area.

- Walked the entire site to  
develop a work plan  
and decide the sequence  
of events.

- Began cleaning out  
under the RIR truss.

- Began plotting out the  
area of excavation as  
per the sample points.

- Weather  
AM - ~50° breezy  
PM - ~70° breezy

- Porta-Jon & wash sink  
on site.

5/8/07

US Finishing  
Greenville, SC.

Site Personnel - K. Cable, M. Stephens,  
J. Holcomb, D. Slaughter, P. Shepherd.

Began the day with an  
work plan / safety mtg.

Continued cleaning out under  
the tressel.

0830 - R. Roberts on site  
for observations. Made  
sure Ralph donned the  
proper safety gear.

Discovered the overhead  
pipes, which also is  
under the tressel, contain  
oil. Spoke with Beth  
about this. He said, the  
lines should have been  
cleaned out, but there  
could be some residue

in them. If we remove  
them, we will cut in  
manageable pieces and  
plus both ends. We will  
also capture and dispose  
of all we can possibly  
capture.

- 10:30 K. Ramsey ~~begin~~ on  
site.

- Began removing the  
tressel.

- Cautioned off both  
ends of area.

11:00 - Jessica Budnark on  
site.

- Some wood debris is  
falling to the ground during  
demo of tressel. This material  
will be removed prior  
to excavation.

5/18/07

- Obtained end caps to cap the overhead piping.

- Some of the support timbers were buried below grade ~ 2'. This section will be cut off and shipped out to Alabama.

5/19/07

Site personnel - K. Cable, J. Holcomb, M. Stephens, D. Slaughter, P. Shepherd.

- Began the day with a safety tailgate mtg.

- Developed a work plan for the day.

- Continue removing the wood timbers from the RR truss.

- After removing the timbers, the concrete overhang was removed. The concrete will be carefully cleaned up and put in a pile by itself.

- Cleaned up all wood debris being very careful not to get much dirt in it. This material is also being placed in a separate stockpile.

5/10/07

Site personnel - K. Cable, J. Holcomb, M. Stephens, D. Slaughter, P. Shepherd.

- Began the day with a safety tailgate mtg.

- Continue cleaning up the concrete and wood debris which had fallen

5/11/07

during demolition.

- Developed a plan of attack to remove the overhead pipes.

- Began cutting out the pipes. Only one of the pipes do not contain oil. The other 2 pipes contain what appears to be #6 oil.

- Located some drums and began catching the oil as to minimize all spillage. Good things we were prepared for this.

- As sections of pipe is drained and removed both ends are being plugged so there will be very little leakage.

5/11/07

Site Personnel - K. Gable, J. Hancock, M. Stephens, D. Slaughter, R. Shepherd.

- Began the day with a safety tailgate mtg.

- Continue draining oil from the pipes and removing the pipes.

- Ralph Roberts on site.

- All pipes are now removed. The ends of the pipes extending out of the pump house and joining up to the pipe these are securely capped so there should be no issues.

- Located drum lids and rings to close up the drums.

5/11/07

- We have ~ 250 gallons of #6 oil. Spoke to Pete about where we could put the drums. He said we can put them inside the garage. The drums are labeled. There was very little spillage during the process. Had to clean up tools used to cut pipes.

- Dwight Little on site to locate the areas to be excavated in the coal storage and pump house areas.

- Began removing overgrowth from the substation area.

- Located a garbage can that contains suspected asbestos.

Diesel Fuel - 864-288-7926

Emels -

Miller - 864-235-7445

5/11/07

Site Personnel - K. Gibb, K. Ramsey, M. Stephens, S. Holcomb.

- Began the day with a safety mtg. work plan.

- A Plan of attack was developed to begin the excavation process.

- Backfill sample checked OK

- The cat excavator 1304 on site to excavate in the tight areas.

- 2 - Woods trucks on site to haul to Emel's Ala.

- Rolled out plastic to load the trucks on.

- Set up Dust Monitor

5/14/07

- Began removing the concrete and loading the truck. This is a very slow process.
  - The third Woods truck is on site.
  - Decided to move to Section J to speed up the loading process. This area will be excavated to a depth of 1' and loaded out to Emelle.
  - Dust monitor - 0.01 mjk
  - R. Roberts on site. We discussed the work plan. The concrete will be broken up and sent to Palmetto. The material on the concrete will be sent to Emelle.
- 1500 - The Woods trucks are loaded, with manifests

and enroute to Emelle.

- Began cleaning off the concrete, busting out the concrete and preparing to load out Palmetto trucks.

5/15/07

Site personnel - K. Cable, M. Stephens, J. Holcomb.

- Begin the day with a tailgate safety & work plan meeting.
- Trucks to haul to Palmetto on site (2).
- Began loading material from Area I. This area will be excavated to a depth of 2' and hauled to Palmetto.
- Set out the Dust monitor

5/15/07

- Area I completed & removed 3 loads of material ~ 60 TONS.
- Began excavating area K. This material will be excavated to a depth of 1' and hauled to Palmetto landfill.
- There is a side walk along the building which appears to be in the limits of the excavation.
- Encountered an old set of RR tracks on the north end of area K. The ties extended under the sidewalk. Used the 320 to remove.
- Completed the excavation of area K. 2 loads ~ 40 TONS.
- Sent one Walker truck to get one load of clean backfill.

- Contacted Pace Labs to let them know they would receive samples for 24-48 hr. turnaround tomorrow. Also informed them of the suspected alcohols.
  - Dust Monitor - 0.01 mg/L
  - Moved to the backside of plant to continue removing the vegetation.
  - Put the material in a separate stack.
- 5/16/07
- Site Personnel - K. Cabk,  
M. Stephens, J. Holcomb.
- Began the day with a safety work plan mtg.
  - Weather - clear sunny ~ 70°

5/16/07

- There are 3 Robbier Woods trucks on site this am to haul to Emelle Ala. We will continue excavating the top 1' of material from Area M.

- Set out the Dust Monitor.

- Set up to begin obtaining confirmation samples.

Sample Info:

OPHA-I-8001	Area K	Bottom	0830
OPHA-I-8002	Area K	1' deep	0905
*OPHA-J-5/16/07	West of Area J (Per)	Surface	0915
OPHA-J-8004	Area J	1' bot.	0922
OPHA-J-8005	Area J	1' bot.	0930
OPHA-J-8006	Area J	1' bot	0937
OPHA-K-8007	Area K	1' bot.	0942
*OPHA-K-8008	Area K	1' bot	0950

171 SU

\*OPHA-K-1009 West of Area K (Per) Surface 1000  
#OPHA-SU010 West of Area K Surface 1009  
#OPHA-SU011 West of Area K Surface 1000

- OPHA-KSU009, SU010, SU011 was obtained from the material (4") on top of the concrete pad. This area is located SW from Area M and North of Area K

- K. Ramsey on site.

- P. Little on site to locate limits, sampling points and areas to be excavated behind the plant.

- Prepared the samples for delivery to Pacu labs. Notified the Lab and requested 24 hr. TAT.

- The 4th Woods Truck on site.

5/16/07

1530 - Complete the loading of the last Woods truck.

- The top 1' of the Mang has been removed.

- Set up to begin excavating down to ~3. We will go just below the layer of coal.

- K. Ramsay left to deliver samples to the lab.

- We are now receiving a small shower of rain. Not much accumulation.

- Dust monitor 0.000mg/m<sup>3</sup>

- Developed a work plan and ordered Walker trucks for the AM.

- Used the small hoe to remove the soil from the tight area. We will load trucks from on top as long as no problems occur.

5/17/07

Site personnel - K. Cable, M. Stephens, J. Holcomb.

Began the day with a tailgate / safety work plan mtg.

- We have 3 Walker trucks on site to haul material to the land fill.

- Things going smooth.

- We have encountered several RR timbers and some old pipes.

5/17/07

- We are loading out all material to the landfill.
- There is some dark staining in some places in the bottom. The staining is probably from the timbers.
- The bottom is not a true level bottom. The coal seam runs from less than 3' in some places and a 4' in others.

5/18/07

Site Personnel: K. Calkin, M. Stephens, J. Holcomb

- Start the day with a safety/work plan mtg.
- 1 Woods truck on site to haul to Emelle.
- We will load tracks out of the C&D areas.
- Set up a loading area to begin the loading process.
- We have 2 Walker trucks on site to haul clean backfill and stockpile.
- The other 3 Woods tracks are lost.
- 1100 - 3 Woods tracks on site.

5/21/07

- Jessica Bednarek and 2 CO-OP students on site for tour.
- Loaded out 4 Trucks to Emelle.
- Contacted Walker for trucks to haul to Palmetto.
- 2 Walker trucks on site. Loaded out 2 loads to Palmetto.
- 2 of the Woods trucks to have soil removed. One of the trucks needs 1,000 lbs removed and the other one needs ~3,000 lbs removed.
- Shut down the trucks hauling backfill in. Hauled in 10 bags of clean backfill.
- Closed down site.

5/21/07

- Site Personnel - K. Coble, M. Stephens, J. Holcomb.
- Began the day with a safety mtg. Developed a work plan.
- Today we will excavate in the east of Area M and Area L.
- Area M is running about 4.5' deep.
- We have 4 Walker trucks on site today to haul to Palmetto landfill.
- Jessica received the con samples results. OPHA-silic and OPHA-sulf has to be removed. The samples were taken on the surface of concrete between the concrete wall and silo.

5/22/67

- Set up loading area I  
Decon area and began  
loading trucks

- Completed Area M excavation  
The deepest area is ~4.5'

- Began excavating Area L. We  
are back into the RZ  
tracks and timbers. This  
removal is a very slow process.

The bottom of the timbers is ~  
18" deep. In some areas we  
are as deep as 2' and  
there is still coal material.

The material is ~6" deep.  
Spoke to Ralph and he  
suggested we get a sample  
from the black material  
and in a few places get  
a sample from the clay.  
He wants to just follow  
the work plan.

- Completed Area L

- Move to backside of plant  
and began excavating  
material from Area E

- Only need one load to  
finish out the day.

- Temp ~85° clear.

= Dust Monitor - 0.03 mg/k

5/22/67

Site Personnel - K. Cable, M. Stephens  
J. Holcomb

- Began the day with a safety  
tailgate mtg

- Developed a work plan for  
the day.

- We are supposed to get 3  
trucks to haul to

5/22/69

Emelle today but they are not on site.

Decided to begin obtaining confirmation samples from Area M and Area L.

CSA-L-B013	~2' clay material	0740	same
CSA-L-B014	~18" coal material	0750	Hole
CSA-L-B015	~2' clay material	0800	same
CSA-L-B016	~18" coal material	0805	partial
CSA-L-B017	~18" coal material	0812	
CSA-L-B018	~18" coal material	0820	
CSA-L-B019	~18" coal material	0829	
CSA-M-B020	~5' clay material	0840	Dark
CSA-M-B021	~5' clay material	0850	Dark
CSA-M-B022	~5' clay material	0900	Dark
CSA-M-B023	~4' clay material	0910	Dark
CSA-M-B024	~4' clay material	0918	Red
CSA-M-B025	~3' clay material	0925	Red
CSA-M-B026	~3' clay material	0934	Red
CSA-M-B027	~3' clay material	0942	Red
CSA-M-L-51028	Surface North of L		
CSA-M-51029	Surface North of M		

- Trucks arrived to haul material to Emelle.
- Set out dust monitor.
- Loaded out the 3 trucks we completed Area C and ~ 40% of Area B. We still have ~ 1 load of material to Emelle. Also loaded out Area G.
- The Walker trucks (4) have been hauling in clean backfill while we are loading this material. We have heated in ~ 600 ton of clean backfill.
- K. Ramsey on site.
- Set up loading area and ch-con area to begin loading trucks to Palmetto.
- Loaded out trucks to Palmetto from Area E.

5/22/07

- Obtain composite samples from Area C, Area D and Area B.

COM-C001 } Area C  
COM-S002 } Surface - ~6'  
COM-D001 } Area D  
COM-D002 } Surface - ~6'  
COM-B001 } Area B  
COM-B002 } Surface - ~6'

These results will be used to determine proper disposal for material. Rev Work Plan. Prep'd and shipped samples.  
- Dust Monitor - 0.02 mg/L

5/23/07

Site Personnel: K. Cible, M. Stephens, J. Holcomb.

- Began the day with a safety mtg.
- Set up the Personnel decon

and loading areas.

- We will continue the excavation of Area E to a depth of 1'

- Walker trucks (4) on site to haul to Palmetto.

- K. Ramsey called and wants to excavate the Reservoir area while we are here.

- Went to look at this area to develop a plan.

- CE Thurston on site to remove the bag of suspected asbestos from the con storage area.

- Contacted Pace Labs to verify that received the samples.

5/23/07

- Completed the excavation of Area F.
- D. Little on site to locate
- Excavate Area F and Area H.

" We loaded out 12 truckloads of material.

5/24/07

Site Personnel - K. Cobb, M. Stephens, J. Helcomb.

- Began the day with a tailgate safety mtg.
- Today we will remove the concrete and 1/4 material behind the silo. This material was sampled (OPHA-silo1) that it was to be taken out. This area will be very difficult to get to

- CE Thurston back on site. They had a manifest problem at Marshall.

- While excavating the area behind the silo, we encountered a line with residual water in it. Allowed the line to drain and seep into the ground. We removed 2 truck loads of material from this area.

- Began excavating in Area H behind the plant. Still no word on sample results. We will leave the road in for now.

- Obtained samples from Area F  
SS-E-B030 1' Bottom 1520  
SS-E-B031 1' Bottom 1526  
SS-E-B032 1' Bottom 1532  
SS-E-B033 1' Bottom 1538

5/24/07

SS-E-SU034	Surface	1544
SS-E-B035	Bottom	1550
SS-E-B036	Bottom	1554
SS-E-B037	Bottom	1558
SS-E-B038	Bottom	1604
SS-E-B039	Bottom	1609
SS-E-B040	Bottom	1613
SS-E-B041	Bottom	1619
SS-E-B042	Bottom	1624
SS-E-B043	Bottom	1630
SS-E-B044	Bottom	1634
SS-E-SU045	Surface	1640
SS-E-SU046	Surface	1648
SS-E-SU047	Surface	1652

- Received word that the samples were OK

- We will continue excavating the material in Area C & Area D to the recommended depth in the work plan.

- Dust Monitor - 0.04 mg/m<sup>3</sup>

5/25/07

Site Personnel - K. Caldwell, M. Stephens, J. Halcomb.

- Began the day with a tailgate safety mtg.
- Set out the Dust Monitor.
- Began loading out trucks to Palmetto Landfill from Area C and Area D.
- We have 3 trucks today.
- We are excavating around what appears to be a 2" gas line. We are moving slowly because we do not know if the line is hot.
- We have encountered a concrete vat in the south end of Area D.

5/25/07

- We are excavating  
c to a depth of 2' (1' to  
Emelle - 1 to Palmetto) Area D  
to a depth of 6' (1' to Emelle  
5 to Palmetto).

Dust Monitor - 0.04 mg/m<sup>3</sup>

Weather Hot sunny ~87°  
very little wind.

5/29/07

Site Personnel - K. Calkin, M. Stephens  
J. Holcomb

Began the day with a safety  
mtg.

One Woods truck to pick up  
the last load to Emelle.

Set out the Dust Monitor.

Weather - ~80°-90° today. Clear  
sunny. Slight breeze from

the SE.

Set up the loading area  
and de-con area.

- Begin loading out material  
to Emelle from Area B.

We have 3 Walker trucks.  
Sent them to haul one  
round of clean backfill.

- Set up the loading area  
next to area C and  
completed this area.

- Moved to Area A. Set  
up loading area and  
began loading trucks.

- Encountered 2 sewer  
mainways while excavating  
in this area.

Ralph Roberts on site.

5/22/07

Obtained con samples from Area C - Area D.

SS-C-B048	2' Bottom	1500
SS-C-B049	2' Bottom	1508
SS-C-B050	2' Bottom	1519
SS-C-B051	2' Bottom	1525
SS-C-B052	2' Bottom	1532
SS-C-B053	2' Bottom	1540
SS-C-S0054	surface	1545
SS-C-B055	2' Bottom	1552
SS-C-B056	2' Bottom	1600
SS-C-B057	Surface	1604
SS-D-B058	6' Bottom	1610
SS-D-B059	6' Bottom	1614
SS-B-B060	1' Bottom	1620
SS-B-B061	1' Bottom	1624
SS-B-B062	1' Bottom	1629
SS-B-B063	1' Bottom	1634
SS-B-B064	1' Bottom	1640
SS-B-B065	1' Bottom	1646
SS-B-B066	1' Bottom	1650
SS-B-B067	1' Bottom	1656
SS-B-S0066	surface	1700
SS-A-B069	bottom	1707

SS-A-B070	1' Bottom	1712
SS-A-B071	1' Bottom	1717
SS-A-B072	0' Surface	1721
SS-A-B073	1' Bottom	1725
SS-A-B074	1' Bottom	1726
PMT-G-B075	2' Bottom	1730
PMT-F-B076	2' Bottom	1735
PMT-F-B077	2' Bottom	1740
PMT-H-B078	1' Bottom	1745
SS-B-B079	1' Bottom	1800

Jessica called and said to samples when over the limit B030, B2, B3, B9, 42, 43. Prepared the samples for shipment to Pace Labs.

Leid out a 6 area from each sample point. We will excavate the areas 1 deeper than before.

JM called a ramp through Area A to get trucks in.

5/30/07

Site Personnel - K. Cable, M. Stephens, J. Holcomb.

Began the day with a tailgate safety mtg.

Developed a work plan for the day.

We will have 3 trucks hauling clean backfill to the site today.

We will backfill Area M, (except the corner behind the silo) Area L, Area J, Area K Area I.

T. Hunsucker & C. Campbell on site to sample the Northern Reservoir.

Dwight Little on site to locate sample points and limits on the backside

of the plant.

After completing the survey, we turned the trucks over to hauling to the landfill we began excavating the hot spots.

- Contacted Waste Management for more manifests, only Wash 2 left. They will FedEx us 12 to arrive tomorrow.

- Continued Sampling

PMT-F-5080	surface	1530
PMT-F-5081	surface	1540
CSA-M-8082	1'	1552
SS-E-8083	2' Resamp	1600
SS-E-8084	2' Resamp	1608
SS-E-8085	2' Resamp	1615
SS-E-8086	2' Resamp	1628
SS-E-8087	2' Resamp	1740
SS-E-8088	2' Resamp	1800

5/30/07

Obtained a backfill sample  
for 8260/8270 metals  
USF-BKFC-002 1630

Continue excavating the  
hot spots.

While excavating SS-E-B039  
next to the tower structure  
we detected a solvent/oily  
odor. This area is ~ 2 1/2  
deep and has a soggy  
bottom.

- Obtained samples from  
the bottom of all the  
hot spots.

- Prepped the samples  
for shipment to Pac  
labs.

- Dust monitor 0.05 mg/m<sup>3</sup>

5/31/07

Site Personnel - K. Cable, M.  
Stephens, J. Holcomb.

Began the day with a  
tailgate safety mtg.

Develop a work plan  
for today.

Today we will continue  
the backfill process  
in the coal storage  
and pump house areas.

When trucks arrive, we  
will haul out the remainder  
of the material from the  
hot spots and mob to  
the reservoir to excavate  
the material there.

- Weather - Partly cloudy ~ 75°

- Set out the dust monitor.

5/31/07

Complete the excavation of the hot spots in Area F.

Mobilized to the Northern Reservoir. Laid out an area around NR-16' in all directions. Excavated the area to a depth of ~30'-36" ↓

NR-SW089 sidewall @ -1' 1240  
NR-SW090 1250  
NR-SW091 1300  
NR-SW092 1310

The samples were taken from the sidewalls of the excavation (1 in each wall) from a depth of 1'-2'.

Sloped in the walls of the excavation after complete.

Mobilized back to the plant and continue backfill process of Areas in coal storage and pump house.

- Sent 2 trucks to get ABC stone to top off road way.

- Jessica called and reported 4 sample areas had failed. SS-C-B049-1.3, SS-C-B053-83, SS-D-B059-1.6, SS-A-BU-072-3.5.

Marked out a 6' area from each sample point in all directions. The areas will be excavated to a depth of 1 1/2' and re-sampled.

6/1/07

Site Personnel - K. Cobb, M. Stephens, J. Holcomb.

Began the day with a tailgate safety mtg.

Today we will have 3 Walker trucks. They will bring clean fill. We will also use them to haul to palmetto as needed.

Had to backfill some of Area E to get access to Area C and Area D.

Began excavating the 2 hot spots out of Area C.

D. little on site to locate sample points and limits.

Obtained soil samples

SS-C-B-093 ~4' Resamp bottom 1080

SS-C-B-094 ~4' Resamp bottom 1100

SS-A-B-095 ~8' Resamp ~~bottom~~ <sup>stream</sup> #1300

-Tamed a point to the Northern Reservoir to locate excavation and sample points.

SS-D-B-096 ~8' Resamp bottom 1440

Jessica called and reported all submitted samples are OK.

Send today's samples to the lab.

Moved both trucks to nearby to haul backfill stockpiled to the back of the plant.

Areas A + B backfilled.

6/4/07

Site Personnel: K. Cabel, M. Stephens, J. Holcomb.

Began the day with a safety mtg.

Weather partly cloudy / warm. Over the weekend, we had a small amount of rain but not enough to hurt. There is some water in the deep excavation of Area D but it is thought to be mostly groundwater.

Today we will haul 2 trucks hauling in clean backfill. We will be backfilling in Area E.

- We should hear about samples some time today.

- Backfilled the area on the south end of Area M next

to the silo.

Continue backfill process in Area E. Still no word on samples.

Backfilled all of Area E and began a stockpile.

6/5/07

Site Personnel: K. Cabel, M. Stephens, J. Holcomb.

Began the day with a tailgate safety mtg. 3 Walker trucks.

Obtained a Trash pump to remove rain water from the deep area of Area D.

Contacted Pace about samples. They are still being ran.

6/15/07

Backfilled the deep area of Area D to prevent water from entering.

Ordered ABC stone to cover the road way in Area A.

- K. Ramsey on site.

- D. Little on site to locate sample points, limits and the points at the Northern Res. When T. Hunsicker obtained sample.

Questions about whether the transformer area, inside the block wall, on the East side of the substation can safely remain. We probably need to get the poles removed to get access to this area. K. Ramsey will check on getting poles removed.

Revised word that all samples were clean except the surface sample in Area A.

Began pushing backfill into Area C and Area D.

6/16/07

Site Personnel: K. Cable, M. Stephens, J. Hokomb.

Began the day with a tailgate safety mtg.

Develop a work plan. Today we will continue the backfill process of Area C & Area D.

We will excavate Area A to the south along the building and re-sample.

We will remove the block wall and excavate

6/6/59

the transformer area located in Area C.

We have 3 Walker trucks hauling in clean backfill. We will convert them to haul to landfill when ready.

Began to tear down the block wall.

- Excavated Area A to the south.

- Obtained con. samples:

SS-A-B097	2' Bottom	1100
SS-A-SU098	surface	1112
SS-A-SU099	surface	1120

- Went ahead and backfilled this area. Samples and limits were marked. Elevation can be adjusted.

SS-A-SU099 was taken ~20' south of SS-A-SU098.

Carlton Fur Power Delivery on site. He verified the lines on the poles in dig area is dead.

Excavated the old transformer area. Hauled the material to Palmetto.

Con. Samples

SS-D-B100 ~2' Bottom 1430

SS-D-B101 ~2' Bottom 1450

- Ramsey called and said, Ralph suggested we get samples to the east of our extra excavation in Area A. The samples were taken ~2' from the edge of the excavation and under the asphalt.

6/6/07

Con. Samples

SS-A-SU102 surface 1600

SS-A-SU103 surface 1630

6/7/07

Site Personnel: K. Cable, M. Stephens  
J. Holcomb.

Began the day with a tailgate safety mtg.

Continue and complete all possible backfill. Area around the poles will not be backfilled until locating.

Checked all areas to make sure the areas are dressed up.

Blanchard came to pick up front end loader.

Put stone on the road in back of the plant.

Took samples to Lab.

6/11/07

Site Personnel: K. Cable, M. Stephens  
J. Holcomb.

Began the day with a tailgate safety mtg.

Still waiting on analytical.

Contacted Peter to hurry up results.

Jessica called and informed us that SS-A-SU098-1.2 and SS-A-SU099-3.2 had to be excavated.

ordered Walker trucks and began excavating to the south of area A.

6/11/07

We are excavating out from the bldg. ~ 16' add parallel with the bldg. to the south.

Excavated to the concrete pad on the south side of the monitoring well.

- D. Little on site to locate sample points and limits.

- Obtained samples:

- SS-A-SU104 surface / under pavement
- SS-A-SU105 surface / under pavement
- SS-A-B106 ~2' bottom
- SS-A-B107 ~2' bottom
- SS-A-SU108 surface / south of area.

Prepared the samples for delivery to Rex Labs.

Back-filled the excavation.

6/15/07

Site Personnel: K. Cable, J. Helcomb, J. Cabala.

Began the day with a tailgate safety mtg.

The received word yesterday that SS-A-SU108 was found to have 3.4 ppm PCB. The sample was taken from the surface on the south side of the pipe chase.

Today we will excavate from the pipe chase to the edge of the bldg. out ~ 15' from the bldg.

We have 3 Walker tracks hauling to Palmetto landfill.

Excavated and manifested 6 truck loads of material from this area.

6/15/07

Sent trucks to get  
clean backfill.

Obtained samples:

SS-A-SU109 Surface / Block

SS-A-SU110 Surface / Top

SS-A-SU111 Surface - South end

SS-A-B112 Bottom ~ 2'

SS-A-B113 Bottom ~ 2'

Sent samples to Rose  
Labo for 24 hr. TAT.

Began backfill process. We  
have a storm drain in the  
south end of excavation.  
This area will be backfilled  
and washed stone will be  
placed around the drain.

6/22/07

Sand and mulch areas  
close to stream.