November 28, 2011

Mr. Randy Nattis
On-Scene Coordinator
U.S. Environmental Protection Agency, Region 4
Atlanta Federal Center
61 Forsyth Street SW
Atlanta, GA 30303-3104

Subject: **Draft Supplemental Emergency Response Letter Report**
Railroad Street Drum
Haralson, Coweta County, Georgia
EPA Contract No. EP-W-05-054
TDD No. TTEMI-05-001-0092

Dear Mr. Nattis:

The Tetra Tech EM Inc. (Tetra Tech) Superfund Technical Assessment and Response Team (START) is submitting this supplemental letter report summarizing additional emergency response activities that were conducted at the Railroad Street Drum site in Haralson, Coweta County, Georgia (see Figure 1) from May 18, 2009 through March 3, 2010. Additional sampling activities were required to further investigate the analytical results obtained during initial emergency response activities, which indicated elevated concentrations of toxaphene in some areas of the site. Tetra Tech START was tasked to conduct additional multimedia sampling at the site, including the preparation of a sampling and analysis plan (SAP); laboratory procurement; prepare written and photographic documentation of response activities; and prepare draft and final letter reports summarizing response activities. Appendix A provides figures illustrating the site location and layout. Appendix B contains tables that summarize analytical results for samples collected during this period. Appendix C provides a photographic log of additional response activities. Appendix D is a table of witnesses for personnel involved in additional response activities. Attachment 1 provides a copy of the subcontracted laboratory analytical data packages for samples collected during this period, including data validation reports prepared by Tetra Tech START. Attachment 2 provides a copy of the Contract Laboratory Program (CLP) data packages for samples collected during this period. Attachment 3 provides a copy of the waste disposal documentation for materials shipped offsite.

MAY 2009 RESPONSE ACTIVITIES

On May 18, 2009, EPA and Tetra Tech START returned to the site to conduct additional sampling activities. From May 18 through 20, 2009, the following samples were collected:

- Seven soil samples were collected from the site as described below:
  - Three surface soil samples (0 to 6 inches below ground surface [bgs]) were collected from near the aboveground storage tanks (AST) located at 17 Railroad Street.
  - Three surface soil samples (0 to 6 inches bgs) and one subsurface soil sample (12 to 24 inches bgs) were collected from the area east of, and downgradient from, Building 1.
  - Soil samples were analyzed for target compound list (TCL) volatile organic compounds (VOC), TCL semivolatile organic compounds (SVOC), organochlorine pesticides, organophosphorous pesticides, and target analyte list (TAL) metals.

- One wipe sample was collected from an area of red staining on the floor inside the storage building located at 17 Railroad Street. The wipe sample was analyzed for TCL SVOCs, organochlorine pesticides, organophosphorous pesticides, and TAL metals.
- Two air samples were collected from inside the storage building located at 17 Railroad Street as described below:
    - One air sample (A-01) was collected on May 19 under ambient conditions.
    - One air sample (A-02) was collected on May 20 during simulated activity conditions using box fans and the existing ventilation system to circulate air inside the building.
    - Air samples were collected using a combination of air sampling equipment, including: summa canisters for VOC analyses; low-volume personal air sampling pumps affixed with polyurethane foam (PUF) and PUF XAD media for organochlorine pesticide and SVOC analyses, respectively; and a low-volume personal air sampling pump affixed with a polyvinyl chloride filter for TAL metals analysis.

Based on discussions between OSC Nattis and representatives from the EPA Region 4 Science and Ecosystem Support Division (SESD) regarding the requested analyses and quick turnaround times, some of the analyses were performed by SESD personnel while others were performed by subcontracted laboratories procured by Tetra Tech START. Laboratory assignments were identified in the SAP, which was submitted previously. Figure 2 of Appendix A illustrates the locations of samples collected during supplemental response activities. Table 1 of Appendix B provides a description of the sample locations.

Analytical Results

Tables 2 through 5 of Appendix B provide a summary of the analytes detected in samples collected during supplemental response activities. Attachments 1 and 2 provide copies of the analytical data packages for samples collected during supplemental response activities. Analytical results are briefly summarized below:

- Analytical results for soil samples indicated the presence of low concentrations of SVOCs, organochlorine pesticides, and total metals. However, no contaminants were identified at concentrations exceeding removal action levels (RAL).
- Analytical results for the wipe sample indicated the presence of toxaphene and metals.
- Analytical results for air samples indicated the presence of VOCs, SVOCs, and metals. However, no contaminants were identified at concentrations exceeding RALs.

EPA and Tetra Tech START demobilized from site on May 20, 2009.

DECEMBER 2009 RESPONSE ACTIVITIES

On December 21 and 22, 2009, EPA, Tetra Tech START, and Environmental Restoration LLC (ER), the Emergency and Rapid Response Services contractor, returned to the site to conduct additional response activities, which included the following:

- ER personnel cleaned empty drums by triple-rinsing each drum with a pressure washer. Rinse water was containerized in drums for future disposal.
- Upon completion of rinsing activities, the top and bottom of each drum was cut off and each drum was flattened using heavy equipment.
- Flattened drums and small containers were placed in a rolloff container for storage until transportation and disposal arrangements were finalized.

MARCH 2010 DISPOSAL ACTIVITIES

In March 2010, EPA and ER returned to the site to conduct transportation and disposal activities. The following provides a brief summary of waste disposal activities:

Container Quantity	Container Type	Waste Description	Disposal Facility
1	55-gallon drum	Waste paint (UN1263)	Allworth, Inc. (Birmingham, Alabama)
1	15-gallon drum	Waste oxidizing solid – ammonium nitrate (UN 1479)	Allworth, Inc. (Birmingham, Alabama)
7	55-gallon drum	Waste pesticides – toxaphene, xylene (UN 3021)	Allworth, Inc. (Birmingham, Alabama)
2	55-gallon drum	Waste toxic solids – endrin, lead (UN2811)	Allworth, Inc. (Birmingham, Alabama)
3	55-gallon drum	Waste toxic liquids – endrin, lead (UN2810)	Allworth, Inc. (Birmingham, Alabama)
1	10-gallon drum	Universal waste – fluorescent light tubes	Allworth, Inc. (Birmingham, Alabama)
4	85-gallon drum	Non-regulated material – solid	Greenleaf Treatment Services (Macon, GA)
1	5-gallon drum	Non-regulated material – solid	Greenleaf Treatment Services (Macon, GA)
1	85-gallon drum	Environmentally hazardous substance – captan (UN3077)	Greenleaf Treatment Services (Macon, GA)
1	85-gallon drum	Waste organochlorine pesticide – solid	Greenleaf Treatment Services (Macon, GA)
1	15-cubic yard rolloff	Empty drums	Greenleaf Treatment Services (Macon, GA)

EPA and ER demobilized from site on March 3, 2010.

If you have any questions or need additional copies of this report, please contact me at (206) 300-0301.

Sincerely,

Brian Croft
Tetra Tech START III Site Manager

Andrew F. Johnson
Tetra Tech START III Program Manager

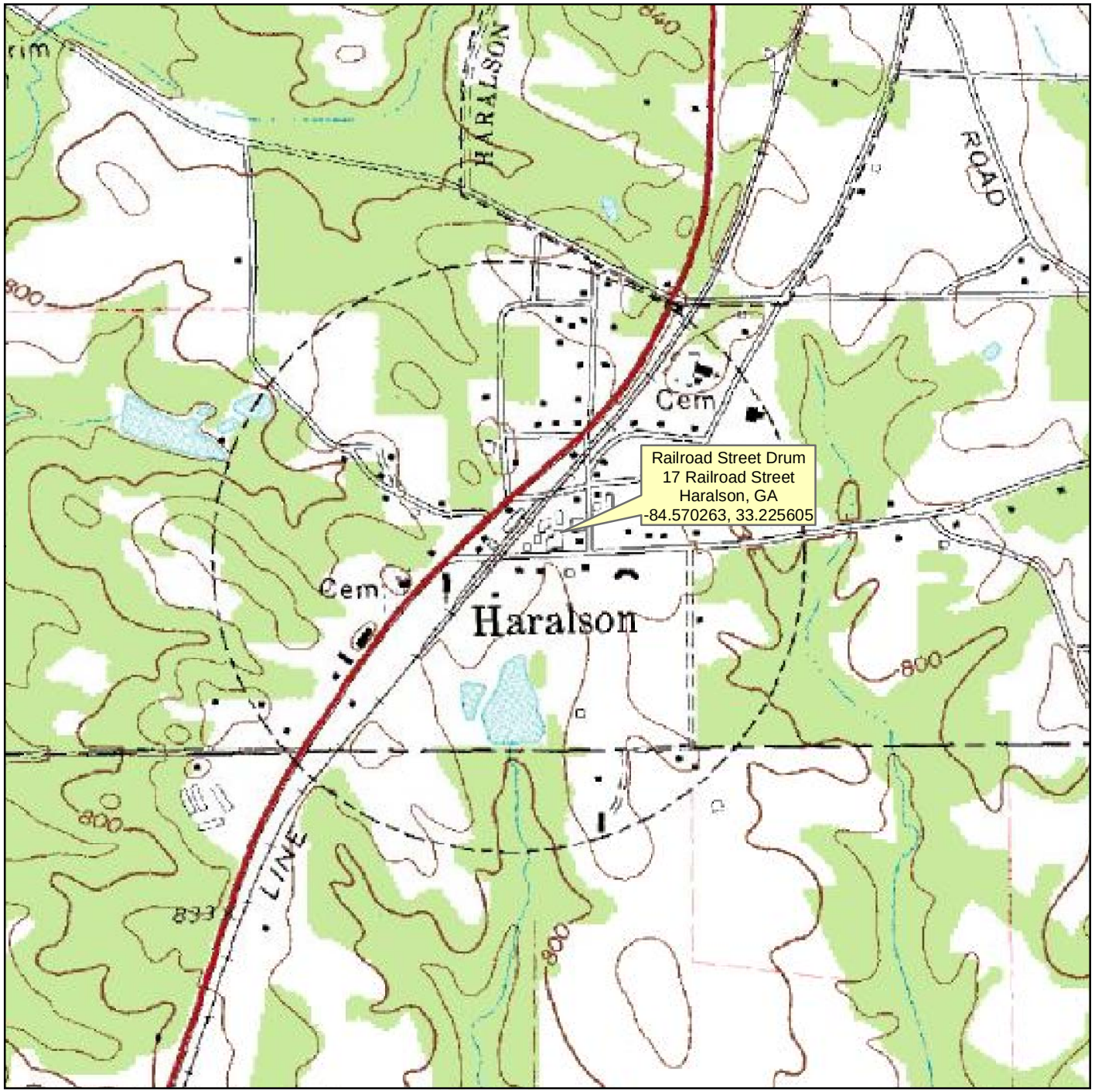
Enclosures (7)

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

APPENDIX A

FIGURES

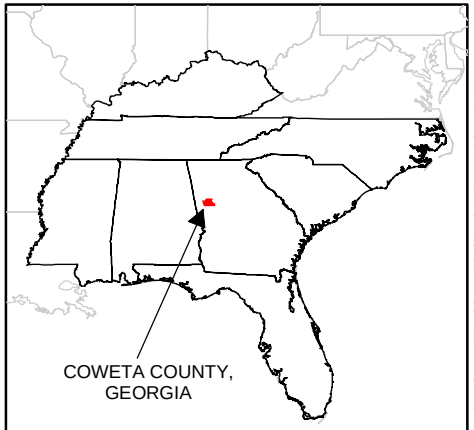
(Two Pages)



0 500 1,000 Feet

1:12,000

MAP SOURCE:
USGS, HARALSON, GA
TOPOGRAPHIC QUADRANGLE, 1981



United States Environmental Protection Agency

RAILROAD STREET DRUM
HARALSON,
COWETA COUNTY,
GEORGIA
TDD No.TTEMI-05-001-0092

FIGURE 1
SITE LOCATION

TETRA TECH

2009-3-25 \GIS_Workspace\TTEMI-05-001-0092_Railroad_Street_Drum\Figures\GIS\MXDs\Site Location Maps\R IV START SITE LOC MAP 3-24-09.mxd TTEMI-KY dale.vonbusch

LEGEND

- Previous Soil Sampling Location (approximate)
- AST
- Silo
- Building (existing)
- Building (demolished)
- Road Edge
- Railroad Tracks
- Supplemental Soil Sampling Location (approximate)
- Supplemental Air Sampling Location (approximate)
- Supplemental Wipe Sampling Location (approximate)

0 75 150 Feet

1:1,800

Map Source:
Aerial Photograph - GlobeXplorer 01/2007, 0.3m Resolution.

United States Environmental Protection Agency

RAILROAD STREET DRUM
HARALSON,
COWETA COUNTY,
GEORGIA
TDD No.TTEMI-05-001-0092

FIGURE 2
SITE LAYOUT WITH SAMPLING LOCATIONS

TETRA TECH

2009-4-10 \GIS_Workspace\TTEMI-05-001-0092_Railroad_Street_Drum\Figures\GIS\MXDs\Site Layout Maps\RR STREET DRUM SITE LAYOUT 4-10-09.mxd TTEMI-KY dale.vonbusch

APPENDIX B

TABLES

(Five Pages)

Table 1
Sample Descriptions

Sample Identification	Sample Description
Soil Samples	
S-05	Surface soil sample (0 to 6 inches bgs) collected from the 17 Railroad Street property from the area between the storage building and the westernmost AST
S-06	Surface soil sample (0 to 6 inches bgs) collected from the 17 Railroad Street property from the area between the storage building and the central AST
S-07	Surface soil sample (0 to 6 inches bgs) collected from the 17 Railroad Street property from the area between the storage building and the easternmost AST
S-08A	Surface soil sample (0 to 6 inches bgs) collected from the area east of and downgradient from Building 1.
S-08B	Suburface soil sample (12 to 24 inches bgs) collected from the area east of and downgradient from Building 1.
S-09	Surface soil sample (0 to 6 inches bgs) collected from the area east of and downgradient from Building 1.
S-10	Surface soil sample (0 to 6 inches bgs) collected from a roadside drainage ditch east of and downgradient from Building 1.
Wipe Sample	
W-01	Wipe sample collected from the floor near the southern corner of the storage building located at the 17 Railroad Street property.
Air Samples	
A-01	Air sample collected from inside the storage building located at the 17 Railroad Street property. Sample A-01 was collected under normal ambient conditions with no ventilation inside the building.
A-02	Air sample collected from inside the storage building located at the 17 Railroad Street property. Sample A-01 was collected under simulated activity conditions using box fans and the exisiting ventilation system to circulate air inside the building.

Notes:

AST Aboveground storage tank
bgs Below ground surface

Table 2
Summary of Analytes Detected - Soil Samples

Analytical Parameter	Units	Removal Action Level (mg/kg) (residential soil)	S-05 (D58F2) (MD58F2) 5/18/2009		S-06 (D58F3) (MD58F3) 5/18/2009		S-06-DUP (D58F5) (MD58F5) 5/18/2009		S-07 (D58F4) (MD58F4) 5/18/2009		S-08A (D58F6) (MD58F6) 5/18/2009		S-08B (D58F8) (MD58F8) 5/18/2009		S-09 (D58F7) (MD58F7) 5/18/2009		S-10 (D58F9) (MD58F9) 5/18/2009	
			Result	Qualifier	Result	Qualifier	Result	Qualifier	Result	Qualifier	Result	Qualifier	Result	Qualifier	Result	Qualifier	Result	Qualifier
VOLATILE ORGANIC COMPOUNDS																		
Acetone	mg/kg	474,000	ND		ND		ND		ND		0.044	J	ND		ND		ND	
Methylene Chloride	mg/kg	1,090	ND		ND		ND		ND		ND		0.021		ND		ND	
Toluene	mg/kg	35,400	ND		ND		ND		ND		0.0012	J	ND		ND		ND	
SEMIVOLATILE ORGANIC COMPOUNDS																		
Acenaphthylene	mg/kg	NE	ND		0.032	J	ND		ND		ND		ND		ND		0.023	J
Anthracene	mg/kg	175,000	ND		0.057	J	ND		ND		ND		ND		ND		0.19	J
Benzo (a) anthracene	mg/kg	8.98	0.084	J	0.69		0.057	J	ND		ND		ND		0.07	J	0.65	
Benzo (a) pyrene	mg/kg	1.48	0.063	J	0.73		0.044	J	0.018	J	ND		ND		0.061	J	0.54	
Benzo (b) fluoranthene	mg/kg	8.98	0.16	J	0.97		0.069	J	0.035	J	ND		ND		0.069	J	0.7	
Benzo (g,h,i) perylene	mg/kg	NE	0.054	J	0.49		0.039	J	ND		ND		ND		0.043	J	0.43	
Benzo (k) flouranthene	mg/kg	8.98	0.096	J	0.95		0.068	J	0.029	J	ND		ND		0.056	J	0.34	
Bis (2-ethylhexyl) phthalate	mg/kg	3,470	ND		0.36		ND		1.2		ND		ND		ND		ND	
Butylbenzylphthalate	mg/kg	25,600	0.21		ND		ND		ND		ND		ND		ND		ND	
Carbazole	mg/kg	NE	ND		0.056	J	ND		ND		ND		ND		ND		0.13	J
Chrysene	mg/kg	89.8	0.2		1.3		0.078	J	0.042	J	ND		ND		0.064	J	0.59	
Dibenzo (a,h) anthracene	mg/kg	2.63	0.019	J	0.2		ND		ND		ND		ND		ND		0.13	J
Dibenzofuran	mg/kg	NE	0.021	J	0.021	J	0.045	J	ND		ND		ND		ND		0.046	J
Fluoranthene	mg/kg	23,300	0.22		1.1		0.09	J	0.038	J	0.027	J	0.025	J	0.13	J	1.3	
Flourene	mg/kg	23,300	ND		ND		ND		ND		ND		ND		ND		0.082	J
Indeno (1,2,3-cd) pyrene	mg/kg	8.98	0.052	J	0.39		0.028	J	ND		ND		ND		0.039	J	0.36	
2-Methylnaphthalene	mg/kg	3,290	0.083	J	0.064	J	0.19	J	ND		ND		ND		ND		0.026	J
Naphthalene	mg/kg	389	0.05	J	0.04	J	0.12	J	ND		ND		ND		ND		0.047	J
Phenanthrene	mg/kg	NE	0.11	J	0.3		0.11	J	ND		ND		ND		0.062	J	0.89	
Pyrene	mg/kg	17,500	0.15	J	0.98		0.083	J	0.031	J	0.022	J	0.021	J	0.11	J	1	J
2,3,4,6-Tetrachlorophenol	mg/kg	18,700	ND		0.041	J	ND		ND		ND		ND		ND		ND	
CHLORINATED PESTICIDES																		
Aldrin	mg/kg	2.86	0.022		ND		0.012		ND		ND		ND		ND		ND	
alpha-BHC	mg/kg	NE	0.0016	J	ND		0.0039		ND		ND		ND		ND		ND	
delta-BHC	mg/kg	NE	ND		ND		0.0042		ND		ND		ND		ND		ND	
gamma-Chlordane	mg/kg	162	0.057		0.06		0.029		ND		ND		ND		ND		ND	
4,4'-DDD	mg/kg	202	0.39		0.35		0.11		0.0029	J	ND		ND		ND		ND	
4,4'-DDE	mg/kg	143	ND		ND		ND		0.0026	J	ND		ND		0.018		0.008	
4,4'-DDT	mg/kg	172	ND		ND		ND		ND		0.0076		ND		ND		ND	
Dieldrin	mg/kg	3.03	ND		ND		ND		0.0022	J	ND		ND		ND		ND	
Endosulfan sulfate	mg/kg	NE	0.41		0.35		0.044		0.0039		ND		ND		ND		ND	
Endrin	mg/kg	187	0.19		0.16		ND		ND		ND		ND		ND		ND	
Heptachlor	mg/kg	10.8	ND		0.0064		ND		ND		ND		ND		ND		ND	
Heptachlor epoxide	mg/kg	5.33	0.051		ND		ND		0.00087	J	ND		ND		ND		ND	
Toxaphene	mg/kg	44.1	17		14		4.4		0.29		ND		ND		ND		ND	
METALS																		
Aluminum	mg/kg	791,000	5300		2800		8100		850		5600		5800		5200		3200	
Arsenic	mg/kg	38.9	1.6		1.4		2.2		0.57	J	2.0		1.8		4.9		1.7	
Barium	mg/kg	164,000	26		26		35		14	J	20		26		57		30	
Beryllium	mg/kg	1,610	0.41	J	0.094	J	0.29	J	ND		0.19	J	0.18	J	0.29	J	0.17	J
Cadmium	mg/kg	729	0.38	J	1.5		ND		ND		ND		ND		0.031	J	ND	
Calcium	mg/kg	NE	920		450	J	940		300	J	340	J	530		570		360	J
Chromium	mg/kg	27,600	25		48		16		24		6.9		6.7		7.4		6.8	
Copper	mg/kg	NE	13		10		15		4.7		4.6		3.4		4.4		3.8	
Iron	mg/kg	575,000	7700		4900		14000		2900		9000		7900		5000		4800	
Lead	mg/kg	400	26		37		18		9.1		16		15		29		20	
Magnesium	mg/kg	NE	500		660		360	J	420	J	370	J	230	J	190	J	350	J
Manganese	mg/kg	18,000	72		46		73		38		71		29		680		130	
Nickel	mg/kg	16,400	4.1	J	17	J	5.5	J	0.78	J	0.82	J	0.86	J	1.8	J	1.1	J
Potassium	mg/kg	NE	720		580		630		480	J	380	J	260	J	250	J	340	J
Selenium	mg/kg	4,110	ND		0.64	J	ND		ND		ND		ND				ND	
Sodium	mg/kg	NE	80	J	22	J	28	J	9.1	J	7.5	J	10	J	6.1	J	4.4	J
Thallium	mg/kg	53.2	0.29	J	ND		0.48	J	ND		0.38	J	0.16	J	0.12	J	ND	
Vanadium	mg/kg	4,140	19	J	8.7	J	36	J	ND		22	J	19	J	11	J	12	J
Zinc	mg/kg	246,000	48		80		57		32		19		12		270		34	

Notes:
J = The analyte was positively identified; the associated value is the approximate concentration of the analyte in the sample.
mg/kg = Milligrams per kilogram
ND = Not detected
NE = Not established

Table 3
Summary of Analytes Detected - Wipe Sample

Analytical Parameter	Units	W-01 (MD58P1) 5/18/2009		W-01 DUP (MD58P0) 5/18/2009		WTB-01 (MD58N9) 5/18/2009	
		Result	Qualifier	Result	Qualifier	Result	Qualifier
CHLORINATED PESTICIDES							
Toxaphene	ug	4800	J	9200	J	ND	
SEMIVOLATILE ORGANIC COMPOUNDS							
Butyl benzyl phthalate	ug	11		13		ND	
METALS							
Aluminum	ug	560		370		ND	
Antimony	ug	0.89	J	0.54	J	ND	
Arsenic	ug	3.4		ND		ND	
Barium	ug	19		10		ND	
Calcium	ug	2100		1400		ND	
Chromium	ug	3.1		2.2		ND	
Copper	ug	140		64		2.7	
Iron	ug	2500		2000		ND	
Lead	ug	9.8		3.7		ND	
Manganese	ug	22		14		ND	
Nickel	ug	11		8.5		ND	
Potassium	ug	490	J	ND		ND	
Silver	ug	0.16	J	0.26	J	ND	
Zinc	ug	440		510		ND	

Notes:
J = The analyte was positively identified; the associated value is the approximate concentration of the analyte in the sample.
ND = Not detected
µg = Micrograms

Table 4
Summary of Analytes Detected - Air Samples

Analytical Parameter	Units	Removal Action Level (ug/m^3) (residential air)	A-01 (MD58E9)		A-01 DUP		A-02 (MD58F0)		ATB-01 (MD58F1)		AMB-01 (MD58E5)	
			5/19/2009		5/19/2009		5/20/2009		5/19/2009		5/19/2009	
			Result	Qualifier	Result	Qualifier	Result	Qualifier	Result	Qualifier	Result	Qualifier
VOLATILE ORGANIC COMPOUNDS												
Acetone	ppbv	96,600	2.5		2.6		6.9		ND		ND	
Benzene	ppbv	31.2	0.16		0.16		0.14		0.050		ND	
2-Butanone (Methyl Ethyl Ketone)	ppbv	15,600	0.26		0.27		0.90		ND		ND	
Chloromethane	ppbv	282	0.33		0.32		0.29		ND		ND	
1,2-Dichloroethane	ppbv	9.36	0.012	J	0.012	J	0.012	J	0.0059	J	ND	
Ethanol	ppbv	NE	0.79	J	0.75	J	1.4		ND		ND	
Ethyl Benzene	ppbv	97.3	0.032	J	0.030	J	0.040		0.0034	J	ND	
4-Ethyltoluene	ppbv	NE	0.031	J	0.028	J	0.049	J	ND		ND	
Freon 11	ppbv	NE	0.52		0.52		0.35		ND		ND	
Freon 12	ppbv	NE	1.2		1.2		0.76		ND		ND	
Freon 113	ppbv	NE	ND		0.084	J	ND		ND		ND	
Heptane	ppbv	NE	ND		ND		0.046	J	ND		ND	
Hexane	ppbv	2,190	0.12	J	0.12	J	0.061	J	ND		ND	
Methylene Chloride	ppbv	518	36		36		23		0.20		ND	
2-Propanol	ppbv	NE	0.25	J	0.23	J	0.50	J	ND		ND	
1,1,2,2-Tetrachloroethane	ppbv	4.2	0.0035	J	0.0036	J	ND		ND		ND	
Tetrachloroethene	ppbv	41.2	0.026	J	0.027	J	0.024	J	0.014	J	ND	
Toluene	ppbv	15,600	0.28		0.28		0.26		0.046		ND	
1,1,1 Trichloroethane	ppbv	15,600	0.0090	J	0.0084	J	0.0085	J	0.0029	J	ND	
Trichloroethene	ppbv	122	ND		0.0056	J	ND		0.10		ND	
1,2,4-Trimethylbenzene	ppbv	21.9	0.054	J	0.051	J	0.077	J	ND		ND	
1,3,5-Trimethylbenzene	ppbv	18.8	ND		ND		0.032	J	ND		ND	
m,p-Xylene	ppbv	13,800	0.074	J	0.075	J	0.11		0.0046	J	ND	
o-Xylene	ppbv	16,300	0.047		0.040		0.082		0.0034	J	ND	
SEMIVOLATILE ORGANIC COMPOUNDS			ND									
Diethylphthalate	ug/m^3	NE	ND		1.6	J	0.36	J	1.4	J	1.2	J
2-Methylnaphthalene	ug/m^3	NE	0.095	J	0.098	J	0.16	J	ND		ND	
4-Methylphenol/3-Methylphenol	ug/m^3	NE	ND		ND		1.7	J	ND		ND	
Naphthalene	ug/m^3	7.16	ND		ND		0.14	J	ND		ND	
Pyrene	ug/m^3	NE	ND		ND		ND		0.029	J	0.037	J
METALS												
Iron	ug/m^3	NE	2.3		ND		2.7		6.6		ND	
Nickel	ug/m^3	NE	ND		ND		ND		0.13	J	ND	

Notes:
J = The analyte was positively identified; the associated value is the approximate concentration of the analyte in the sample.
ND = Not detected
ppbv = parts per billion volume
µg/m^3 = Micrograms per cubic meter

Table 5
Summary of Analytes Detected - QC Samples

Analytical Parameter	Units	SFB-01 (D58E6) (MD58E6)		SRB-01 (D58E7) (MD58E7)		MB-01 (MD58E4)	
		5/18/2009		5/18/2009		5/18/2009	
		Result	Qualifier	Result	Qualifier	Result	Qualifier
METALS		ND		ND		ND	
Calcium	ug/L	28	J	ND		ND	
Nickel	ug/L	ND		ND		0.6	J
Sodium	ug/L	46	J	ND		ND	

Notes:

J = The analyte was positively identified; the associated value is the approximate concentration of the analyte in the sample.

ND = Not detected

µg/L = Micrograms per liter

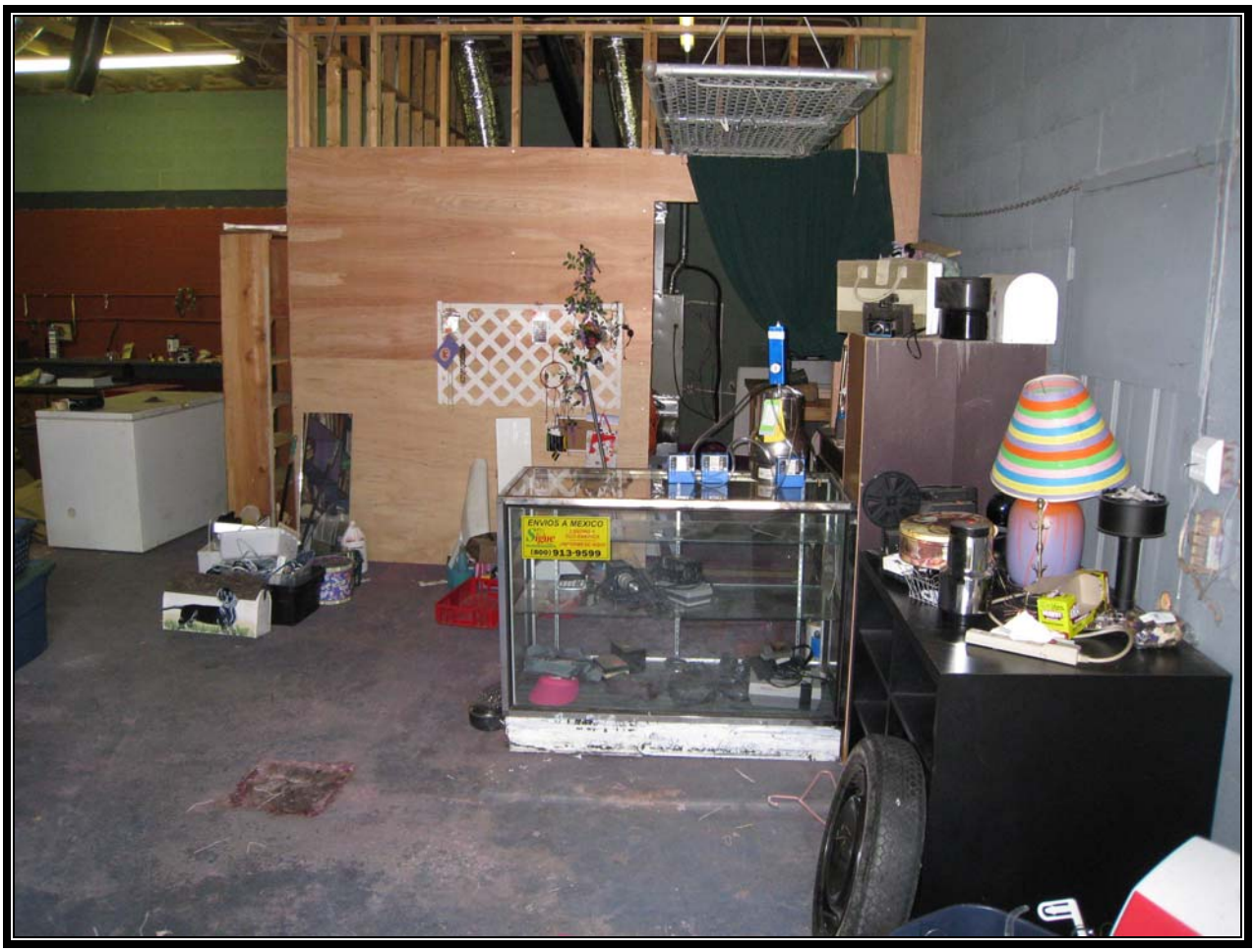
APPENDIX C

PHOTOGRAPHIC LOG

(Six Pages)

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

TDD Number:	TTEMI-05-001-0092	**Location:**	Railroad Street Drum
Orientation:	North	**Date:**	March 13, 2009
Photographer:	Brian Croft, Tetra Tech	**Witness:**	Brandon Foskey, Tetra Tech
Subject:	Building and three above ground storage tanks (AST) located at the 17 Railroad Street property.		



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

TDD Number:	TTEMI-05-001-0092	**Location:**	Railroad Street Drum
Orientation:	Southeast	**Date:**	May 19, 2009
Photographer:	Brian Croft, Tetra Tech	**Witness:**	Stephen Ball, EPA

Subject: Air sampling equipment in operation inside the storage building located at the 17 Railroad Street property.

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

TDD Number:	TTEMI-05-001-0092	**Location:**	Railroad Street Drum
Orientation:	Northwest	**Date:**	May 19, 2009
Photographer:	Brian Croft, Tetra Tech	**Witness:**	Stephen Ball, EPA

Subject: Air sampling equipment in operation inside the storage building located at the 17 Railroad Street property.

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

TDD Number:	TTEMI-05-001-0092	**Location:**	Railroad Street Drum
Orientation:	Southwest	**Date:**	May 18, 2009
Photographer:	Brian Croft, Tetra Tech	**Witness:**	Randy Mayer, Tetra Tech

Subject: Area located to the east of, and downgradient from, Building 1, where soil samples S-08A, S-08B, and S-09 were collected. Building 1 is located behind the trees in the right portion of the photograph.

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

TDD Number:	TTEMI-05-001-0092	**Location:**	Railroad Street Drum
Orientation:	Northeast	**Date:**	May 18, 2009
Photographer:	Brian Croft, Tetra Tech	**Witness:**	Randy Mayer, Tetra Tech

Subject: Drainage ditch located along the road immediately north of Building 1.

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

TDD Number:	TTEMI-05-001-0092	**Location:**	Railroad Street Drum
Orientation:	Northeast	**Date:**	December 22, 2009
Photographer:	Brian Croft, Tetra Tech	**Witness:**	Randy Nattis, EPA

Subject: Environmental Restoration LLC personnel rinsing and cutting empty drums.

APPENDIX D

TABLE OF WITNESSES

(One Page)

TABLE OF WITNESSES

RAILROAD STREET DRUM
HARALSON, COWETA COUNTY, GEORGIA

Randy Nattis
On-Scene Coordinator (OSC), Region 4
U.S. Environmental Protection Agency
Sam Nunn Atlanta Federal Center
61 Forsyth Street SW
Atlanta, GA 30303
Telephone No.: (404) 562-8757

Brian Croft, Site Manager
Randy Mayer, Team Member
Tetra Tech Region 4 Superfund Technical
Assessment and Response Team (START)
1955 Evergreen Boulevard, Suite 300
Duluth, Georgia 30096
Telephone No.: (678) 775-3080

Jake Jones
Environmental Restoration LLC
6940 Commercial Drive
Morrow, Georgia 35673
Telephone No.: (770) 961-9272

Frank Wilkerson (Property Owner)
1 Main Street
P.O. Box 116
Haralson, Georgia 30229
Telephone No.: (770) 599-3108

ATTACHMENT 1

SUBCONTRACTED LABORATORY ANALYTICAL DATA PACKAGES

(2,297 Pages)

(Electronic copy on compact disc)

ATTACHMENT 2

CLP ANALYTICAL DATA PACKAGES

(101 Pages)

(Electronic copy on compact disc)

ATTACHMENT 3

WASTE DISPOSAL DOCUMENTATION

(Eight Pages)

(Electronic copy on compact disc)

1103389

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
GAN000410374	1	(877) 577-2689	006586728 JJK

GENERATOR

5. Generator's Name and Mailing Address
US EPA R4 ERRB
61 FORSYTH ST. SW
ATLANTA GA 30303 (770)961-9272
Generator's Phone:

Generator's Site Address (if different than mailing address)
US EPA R4 ERRB
RAILROAD STREET
HARALSON GA 30229 (770)961-9272

6. Transporter 1 Company Name
PSC RECOVERY SYSTEMS, LLC.
U.S. EPA ID Number
GAR000026088

7. Transporter 2 Company Name
U.S. EPA ID Number

8. Designated Facility Name and Site Address
ALLNORTH, LLC
500 NEDCO ROAD
BIRMINGHAM, AL 35217 (205) 841-1707
Facility's Phone:
U.S. EPA ID Number
ALD094475793

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. UNZ810 WASTE TOXIC SOLIDS, ORGANIC, N.O.S. (ENDRIN, LEAD) 6.1 PGII	3	DM	$160	G	D008 D009 D012
X	2. UNZ811 WASTE TOXIC SOLIDS, ORGANIC, N.O.S. (ENDRIN, LEAD) 6.1 PGII	2	DM	110	G	D008 D009 D012
X	3. UN3021 WASTE, PESTICIDES, LIQUID, FLAMMABLE, TOXIC, (TOXAPHENE, XYLENE) 3 (6.1) PGII	7	DM	385	G	D007 D008 D009
X	4. UN1479 WASTE OXIDIZING SOLID, N.O.S. (AMMONIUM NITRATE) 5.1 PGII	1	DF	15	G	D001

14. Special Handling Instructions and Additional Information
(1) 442330-00 - ERG(153) PESTICIDE/HERBICIDE (2) 442329-00 - ERG(154) PESTICIDE/HERBICIDE (3) 442328-00 - ERG(131) LOOSEPACK PESTICIDES (4) 442333-00 - ERG(140) FERTILIZER LOOSEPACK

2x55 7x55 1x15

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Leslie Sims 8ac EPA
Signature: for EPA
Month: 02 Day: 26 Year: 10

INTL

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Tim Kistler
Signature:
Month: 3 Day: 3 Year: 10
Transporter 2 Printed/Typed Name:
Signature:
Month: Day: Year:

DESIGNATED FACILITY

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator) U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) Month: Day: Year:

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.
H040	H040	H040	H141

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Amber McNair
Signature:
Month: 03 Day: 12 Year: 10

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

221291

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)	21. Generator ID Number	22. Page	23. Manifest Tracking Number
	GAR000410274	of 2	006586729JJK

24. Generator's Name
US EPA R4 ERRB
61 FORSYTH ST. SW . ATLANTA GA 30303 (770)961-9272

25. Transporter _____ Company Name — U.S. EPA ID Number

26. Transporter _____ Company Name — U.S. EPA ID Number

27a. HM	27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	28. Containers No.	28. Containers Type	29. Total Quantity	30. Unit Wt./Vol.	31. Waste Codes
X	5 UN1263 WASTE PAINT 3 PGII	1	DM	55	G	D001
	6 UNIVERSAL WASTE/FLUORESCENT LIGHT TUBES	1	CF	10	P	
	7					
	8					
	9					
	10					
	11					
	12					
	13					
	14					

32. Special Handling Instructions and Additional Information (5) 442334-00 - ER61128) PAINT LOOSEPACK (6) 442331-00 - FLOURESCENT LIGHT TU
1X55 1X6X

GENERATOR

TRANSPORTER

33. Transporter _____ Acknowledgment of Receipt of Materials
Printed/Typed Name _____ Signature _____ Month Day Year

34. Transporter _____ Acknowledgment of Receipt of Materials
Printed/Typed Name _____ Signature _____ Month Day Year

DESIGNATED FACILITY

35. Discrepancy

36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
(5) H141 (6) H141

EPA Form 8700-22A (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

Manifest No: 006586728 JJK Page 2 of 2

Underlying Hazardous Constituents and/or constituents of concern

Waste common name: Generator: USEPA R4 ERRB Lab code: 44330, 44329

For D001-D043, F001-F005, F039 waste streams

Please identify those underlying hazardous constituents, or constituents of concern, which are resonably expected to be present in the waste referenced above.

____ **Check here if none of the underlying hazardous constituents, or constituents of concern, are present in this waste above the UTS levels in 40 CFR 268.48.**

____ A2213
____ ACENAPHTHALENE
____ ACENAPHTHENE
____ ACETONE
____ ACETOPHENONE
____ ACETRONTRILE
____ 2-ACETYLAMINOFLURENE
____ ACROLEIN
____ ACRYLAMIDE
____ ACRYLONITRILE
____ ALDICARB SULFONATE
____ ALDRIN
____ ALPHA-BHC
____ 4-AMINOBIPHENYL
____ ANILINE
____ ANTHRACENE
____ BARBAN
____ BENDIOCARB
____ BENDIOCARB PHENOL
____ BENOMYL
____ BENZAL CHLORIDE
____ BENZENE
____ BENZO(A)ANTHRACENE
____ BENZO(A)PYRENE
____ BENZO(B)FLUORANTHENE
____ BENZO(G,H,I)PERYLENE
____ BENZO(K)FLUORANTHENE
____ BETA-BHC
____ GAMMA-BHC
____ DELTA-BHC
____ BROMODICHLOROMETHANE
____ BROMOFORM
____ BROMOFORM(TRIBROMOMETHAN
____ BROMOMETHANE(METHYL BROM
____ 4-BROMOPHENYL PHENYL ETHER
____ 2-SEC-BUTYL-4,6-DINITROPHENOL
____ BUTYL BENZYL PHTHALATE
____ BUTYLATE
____ CARBARYL
____ CARBENZADIM
____ CARBOFURAN
____ CARBOFURAN PHENOL
____ CARBON DISULFIDE
____ CARBON TETRACHLORIDE
____ CARBOSULFAN
____ CHLORDANE
____ P-CHLORO-M-CRESOL
____ 2-CHLORO1,3-BUTADIENE
____ P-CHLOROANILINE
____ CHLOROBENZENE
____ CHLOROBENZILATE
____ CHLORODIBROMOMETHANE
____ CHLOROETHANE
____ BIS (2-CHLOROETHOXY) METHANE
____ 2-CHLOROETHYL VINYL ETHER
____ BIS (2-CHLOROETHYL)ETHER
____ CHLOROFORM
____ BIS (2-CHLOROISOPROPYL)ETHER
____ CHLOROMETHANE
____ CHLOROMETHANE METHYL CHL
____ 2-CHLORONAPHTHALENE
____ 2-CHLOROPHENOL
____ 3-CHLOROPROPENE
____ CHRYSENE
____ O-CRESOL
____ CRESOL(M&P ISOMERS)
____ M-CUMENYLMETHYLCARBAMATE
____ CYCLOATE
____ CYCLOHEXANONE
____ O,P-DDD
____ P,P-DDD
____ O,P-DDE
____ P,P-DDE
____ O,P-DDT
____ P,P-DDT
____ DI-N-BUTYL PHTHALATE
____ DI-N-OCTYL PHTHLATE
____ DI-N-PROPYLNITROSAMINE
____ DI-N-PROPYLNITROSOAMINE
____ DIBENZO(A,E)PYRENE
____ DIBENZO(A,H)ANTHRACENE
____ 1,2-DIBROMETHANE
____ 1,2-DIBROMO-3-CHLOROPROP
____ DIBROMOMETHANE
____ TRIS (2,3-DIBROMOPROPYL)P
____ M-DICHLOROBENZENE
____ O-DICHLOROBENZENE
____ P-DICHLOROBENZENE
____ DICHLORODIFLUOROMETHANE
____ 1,1-DICHLOROETHANE
____ TRANS-1,2-DICHLOROETHANE
____ 1,2-DICHLOROETHANE
____ 1,1-DICHLOROETHYLENE
____ 2,4-DICHLOROPHENOL
____ 2,6-DICHLOROPHENOL
____ 2,4-DICHLOROPHENOXYACETIC
____ CIS-1,3-DICHLOROPROPENE
____ 1,2-DICHLOROPROPENE
____ TRANS-1,2-DICHLOROPROPENE
____ DIELDRIN
____ DIETHYL PHTHALATE
____ DIETHYLENE GLYCOL, DICARB
____ 2,3-DIMETHYL PHENOL
____ DIMETHYL PHTHALATE
____ P-DIMETHYLAMINOAZOBENZEN
____ DIMETILAN
____ 4,6-DINITRO-O-CRESOL
____ 1,4-DINITROBENZENE
____ 2,3-DINITROPHENOL
____ 2,4-DINITROTOLUENE
____ 2,6-DINOTROTOLUENE
____ 1,4-DIOXANE
____ DIPHENYL
____ 1,2-DIPHENYL HYDRAZINE
____ DIPHENYLAMINE
____ 1,2DIPHENYLHYDRAZINE
____ DIPHENYLNITROSAMINE
____ DISULFOTON
____ DITHIOCARBAMATES (TOTAL)
____ ENDOSULFAN I
____ ENDOSULFAN II
____ ENDOSULFAN SULFATE
X ENDRIN
____ ENDRIN ALDEHYDE
____ EPTC
____ 2-ETHOXYETHANOL
____ ETHYL ACETATE
____ ETHYL BENZENE
____ ETHYL CYANIDE
____ ETHYL ETHER
____ ETHYLENE OXIDE
____ BIS (2-ETHYLHEXYL)PHTHALATE
____ FAMPHUR
____ FLUORANTHENE
____ FLUORENE
____ FLUOROTRICHLOROMETHANE
____ FORMETANATE HYDROCHLORIDE
____ FORMPARANATE
____ HEPTACHLOR
____ HEPTACHLOR EPOXIDE
____ HEXACHLOROBENZENE
____ HEXACHLOROBUTADIENE
____ HEXACHLOROCYCLOPENTADIEN
____ HEXACHLOROETHANE
____ HEXACHLOROPROPYLENE
____ HxCDDs
____ HxCDFs
____ INDENO(1,2,3-C,D)PYRENE
____ 3-IODO-2-PROPYNYL N-BUTY
____ IODOMETHANE
____ ISOBUTYL ALCOHOL
____ ISODRIN
____ ISOLAN
____ ISOSAFROLE
____ KEPONE
____ METHACRYLATE
____ METHACRYLONITRILE
____ METHANOL
____ METHAPYRILENE
____ METHIOCARB
____ METHOMYL
____ METHOXYCHLOR
____ METHYL ETHYL KETONE
____ METHYL ISOBUTYL KETONE
____ METHYL METHACRYLATE
____ METHYL METHANSULFONATE
____ METHYL PARATHION
____ 3-METHYLCHOLANTHRENE
____ 4,4-METHYLENE BIS2-CHLOR
____ METHYLENE CHLORIDE
____ METOLCARB
____ MOLINATE
____ N-BUTYL
____ N-NITROSO-DI-N-BUTYLAMIN
____ N-NITROSODIETHYLAMINE
____ N-NITROSODIMETHYLAMINE
____ N-NITROSOMETHYLETHYLAMINE
____ N-NITROSOMORPHOLINE
____ N-NITROSOPIPERIDINE
____ N-NITROSOPYRROLIDINE
____ NAPHTHALENE
____ 2-NAPHTHYLAMINE
____ 5-NITRO-O-TOLUIDINE
____ O-NITROANILINE
____ P-NITROANILINE
____ NITROBENZENE
____ O-NITROPHENOL
____ P-NITROPHENOL
____ 2-NITROPROPANE
____ NITROSAMINE
____ OXAMYL
____ PARATHION
____ PEBULATE
____ PECDDs
____ PECDFs
____ PENTACHLOROBENZENE
____ PENTACHLOROETHANE
____ PENTACHLORONITROBENZENE
____ PENTACHLOROPHENOL
____ PHENACETIN
____ PHENANTHRENE
____ PHENOL
____ O-PHENYLENEDIAMINE
____ PHORATE
____ PHTHALIC ACID
____ PHTHALIC ANHYDRIDE
____ PHYSOSTIGMINE
____ PHYSOSTIGMINE SALICYLATE
____ PROMECARB
____ PRONAMIDE
____ PROPHAM
____ PROPOXUR
____ PROSULFOCARB
____ PYRENE
____ PYRIDINE
____ SAFROLE
____ SILVEX(2,4,5-TP)
____ 2,4,5-T
____ TCDDs
____ TCDFs
____ 1,2,4,5-TETRACHLOROBENZE
____ 1,1,1,2-TETRACHLOROETHAN
____ 1,1,2,2,-TETRACHLOROETHAN
____ TETRACHLOROETHYLENE
____ 2,3,4,6-TETRACHLOROPHENO
____ THIODICARB
____ THIOPHANATE-METHYL
____ TIRPATE
____ TOLUENE
____ TOTAL PCBs
____ TOXAPHENE
____ 1,1,2-TRICHLORO-1,2,2TRI
____ 1,2,4-TRICHLOROBENZENE
____ 1,1,1-TRICHLOROETHANE
____ 1,1,2-TRICHLOROETHANE
____ TRICHLOROETHYLENE
____ TRICHLOROMONOFLUOROMETHANE
____ 2,4,5-TRICHLOROPHENOL
____ 2,4,6-TRICHLOROPHENOL
____ 1,2,3-TRICHLOROPROPANE
____ TRICHLOROTRIFLUOROETHANE
____ TRIETHYLAMINE
____ TRILLATE
____ VERNOLATE
____ VINYL CHLORIDE
____ XYLENES-MIXED

Inorganic Constituents

____ ANTIMONY
____ ARSENIC
____ BARIUM
____ BERYLLIUM
____ CADMIUM
____ CHROMIUM
____ COPPER
____ CYANIDE (TOTAL)
____ FLUORIDE *1
X LEAD
____ MERCURY-ALL OTHERS
X MERCURY-NONWASTEWATER
____ NICKEL
____ SELENIUM *2
____ SILVER
____ SULFIDE *1
____ THALLIUM
____ VANADIUM *1
____ ZINC *1

*1 Not Underlying hazardous constituents in characteristic waste, acording to the definition at 268.2(I) 40 CFR.

*2 This constituent is not an UHC as defined at 40 CFR 268.2(I) because it's UTS level is greater that it's TC level, thus a treated selenium waste would always be characteristically hazardous, unless treated to below it's characteristic level.

Leslie Sims for EPA — for EPA

Name — Signature

FOSC — 2/26/10

Title — Date

8/24/98

NON-HAZARDOUS WASTE MANIFEST

1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Waste Tracking Number
GAN000410374	1	404-562-8700	09486

5. Generator's Name and Mailing Address: US Environmental Protection Agency-R4
61 Forsyth St SW
Atlanta, GA 30303
Generator's Phone: 404-562-8700

Generator's Site Address (if different than mailing address): Railroad Street
Haralson, GA 30229

6. Transporter 1 Company Name: Greenleaf Treatment Services — U.S. EPA ID Number: GAR000007484

7. Transporter 2 Company Name — U.S. EPA ID Number:

8. Designated Facility Name and Site Address: Greenleaf Treatment Services
100 Waste Research Drive
Macon, GA 31206
Facility's Phone: 478-788-8899 — U.S. EPA ID Number: GAR000007484

	9. Waste Shipping Name and Description	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.
1.	Non-Regulated Material, Solid (STA-Green) Approval #14378	064 ~~006~~	PM ~~DF~~	330	G
2.	Non-Regulated Material, Solid (Demosan 65W) Approval #14380	001	PM ~~DF~~	005	G
3.					
4.					

13. Special Handling Instructions and Additional Information
9b.1. STA-Green Fertilizer: 6x55
9b.2. Dupont Demosan 65W Fungicide: 1x5

75542

14. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.
Generator's/Offeror's Printed/Typed Name: Kenny Hester — Signature — Month 3 Day 1 Year 10

15. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter Signature (for exports only): Date leaving U.S.:

16. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name — Signature — Month Day Year
Transporter 2 Printed/Typed Name: Kent Wilmore — Signature: Kent Wilmore — Month 3 Day 1 Year 10

17. Discrepancy
17a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

17b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:

17c. Signature of Alternate Facility (or Generator) — Month Day Year

18. Designated Facility Owner or Operator: Certification of receipt of materials covered by the manifest except as noted in Item 17a
Printed/Typed Name: Leighann Sares — Signature: Leighann Sares — Month 3 Day 12 Year 10

GENERATOR — INT'L — TRANSPORTER — DESIGNATED FACILITY

169-BLC-O 6 10498 (Rev. 8/06) DESIGNATED FACILITY TO GENERATOR

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
	GAN000410374	1	404-562-8700	003565785 JJK

GENERATOR

5. Generator's Name and Mailing Address: US Environmental Protection Agency-R4, 61 Forsyth St SW, Atlanta, GA 30303, 404-562-8700

Generator's Site Address (if different than mailing address): Railroad Street, Haralson, GA 30229

6. Transporter 1 Company Name: Greenleaf Treatment Services — U.S. EPA ID Number: GAR000007484

7. Transporter 2 Company Name — U.S. EPA ID Number:

8. Designated Facility Name and Site Address: Pollution Control Industries, 5485 Victory Lane, Millington, TN 38053, 888-724-8366 — U.S. EPA ID Number: TND000772186

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. RQ, Environmentally Hazardous Substance, Solid, n.o.s. (Captan) 9, UN3077, PG III, ERG #171	001	DM DF	085 ~~080~~	P G	
X	2. RQ, Waste Organochlorine Pesticide, solid, toxic, 6.1, UN2761, PG II, ERG #151	001	DM DF	085 ~~010~~	P G	U061
	~~3. Hazardous Waste Liquid, n.o.s. (Mercury, Toxaphene) 9, NA3082, PG III, ERG #171~~	~~003~~	~~DM~~	~~165~~	~~G~~	~~D009 D015~~
	~~4. Hazardous Waste Solid, n.o.s. (Mercury, Toxaphene) 9, UN3077, PG III, ERG #171~~	~~002~~	~~DM~~	~~110~~	~~G~~	~~D009 D015~~

14. Special Handling Instructions and Additional Information

9b.1. Captan: ~~1x30~~: Approval #6243 1x55gal DM
9b.2. DDT 50%: ~~1x10~~: Approval #6244 1x55gal DM
9b.3. Rinsate Drums: 3x55: Approval #
9b.4. Poly sheeting drums: 2x55: Approval # 75621

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Ramon Natale — Signature — Month: 03 Day: 01 Year: 10

INT'L

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit: Date leaving U.S.:
Transporter signature (for exports only):

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: Kent Wilmore — Signature — Month: 3 Day: 01 Year: 10

Transporter 2 Printed/Typed Name — Signature — Month: Day: Year:

DESIGNATED FACILITY

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator) — Month: Day: Year:

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name — Signature — Month: Day: Year:

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

Greenleaf Treatment Services LLC

Land Disposal Restriction (LDR) Notification Form

Generator US EPA-R4 US EPA ID # GAN000410374 Manifest Doc.# 003965785 JJK

1 Manifest page # and line item	2 EPA Hazardous Waste Code	3a WW	3b NWW	4 Subcategory (if applicable)	5 F001-F005 Constituents (if applicable)	6 UHC; Underlying Hazardous Constituents (if applicable)	7 LDR Certification (one per line)
9b.1.	N/A		X				6
9b.2	U061		X				2
9b.3.	D009		X				2
9b.3.	D015		X				2
9b.4.	D009		X				2
9b.4.	D015		X				2

The list of waste codes continues Yes ____ No X

Waste on following line item(s) is subject to "California List" restrictions of 40 CFR 268.32 for the following characteristic(s):	
California List Characteristics	**Manifest Line Item(s)**
Liquid hazardous wastes >= 50 ppm PCBs	
Hazardous wastes with HOCs >= 1000 ppm (40 CFR 268, Appendix III)	
Liquid hazardous wastes with nickel concentrations > 134 mg/L	
Liquid hazardous wastes with thallium concentrations > 130 mg/L	

LDR Certifications (Please list only one for each of the above line entries)	
1.	This waste complies with the treatment standards specified in 40 CFR 268, Subpart D, and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(d).
2.	This waste does not meet the treatment standards specified in 40 CFR 268, Subpart D, or exceeds the applicable treatment standards set forth in CFR 268.32 or RCRA Section 3004(d). Waste must be treated to the appropriate standards.
3.	This waste has been treated in accordance with 40 CFR 268.40 to remove the hazardous characteristic. The above listed underlying hazardous constituents are likely present in the waste, and must be treated to the applicable standards set forth in 40 CFR 268.40 prior to land disposal.
4.	This waste is lab pack waste for incineration, and qualifies for alternative treatment as described in 40 CFR 268.42(c). Codes not eligible for alternate treatment are as follows: D009, F019, K003, K004, K005, K006, K062, K071, K100, K106, P010, P011, P012, P076, P078, U134, AND U151.
5.	This waste qualifies for exemption from land disposal restriction. (Please attach explanation which includes the date exemption was granted.)
6.	This waste is not restricted under 40 CFR 268.

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(d). I believe that the information I submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

Printed Name Randy Nettles Date 3-1-10

Signature [signature] Title OSC

NON-HAZARDOUS WASTE MANIFEST	1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Waste Tracking Number
	GAN000410374	1	404-562-8700	09485

GENERATOR

5. Generator's Name and Mailing Address: US Environmental Protection Agency-R4
61 Forsyth St SW
Atlanta, GA 30303
Generator's Phone: 404-562-8700

Generator's Site Address (if different than mailing address): Railroad Street
Haralson, GA 30229

6. Transporter 1 Company Name: Greenleaf Treatment Services — U.S. EPA ID Number: GAR000007484

7. Transporter 2 Company Name — U.S. EPA ID Number:

8. Designated Facility Name and Site Address: Greenleaf Treatment Services
100 Waste Research Drive
Macon, GA 31206
Facility's Phone: 478-788-8899 — U.S. EPA ID Number: GAR000007484

	9. Waste Shipping Name and Description	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	
1.	Non-Regulated Material, Solid (RCRA Empty Drums) Approval #14379	001	CM	15	T	
2.						
3.						
4.						

13. Special Handling Instructions and Additional Information

9b.1. Cut up RCRA Empty drums

75691

14. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Generator's/Officer's Printed/Typed Name: Randy Watts — Signature — Month Day Year

INT'L

15. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit: Date leaving U.S.:

Transporter Signature (for exports only):

TRANSPORTER

16. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: Swiney Bond — Signature — Month 2 Day 10 Year 10

Transporter 2 Printed/Typed Name — Signature — Month Day Year

DESIGNATED FACILITY

17. Discrepancy

17a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

17b. Alternate Facility (or Generator) — U.S. EPA ID Number

Facility's Phone:

17c. Signature of Alternate Facility (or Generator) — Month Day Year

18. Designated Facility Owner or Operator: Certification of receipt of materials covered by the manifest except as noted in Item 17a

Printed/Typed Name: Leighana Spires — Signature: Leighana Spires — Month Day Year

A.C. White Transfer & Storage Co., Inc
670 Guy Paine Rd.
Macon, GA 31206
(478) 788-1436

2323

Customer's Name Green Leaf
Address _____
Commodity _____
Carrier _____
Date 8 Mar 2010
Tractor No. 537222 Trailer No. _____

39600 lb Gross
00 lb Tare
39600 lb Net

6.5

Remarks _____

Cash _____ Charge ✓

Shipper _____
Weigher C Smeed